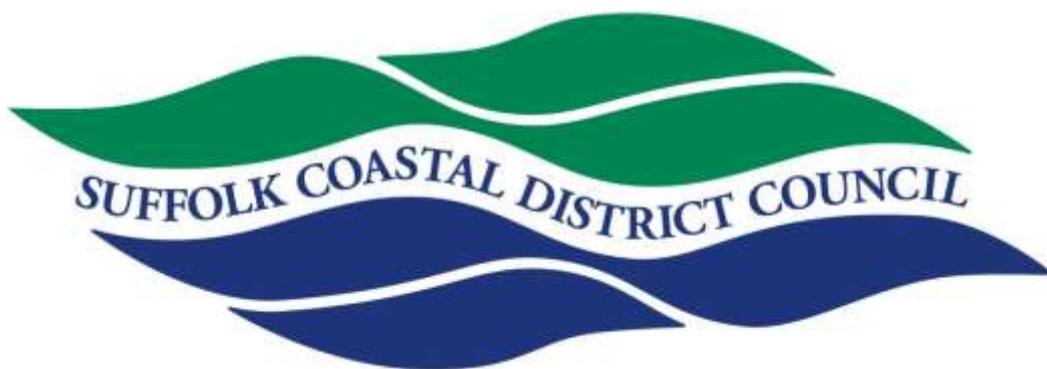


# Consultation Statement for the Suffolk Coastal Local Plan

How we took into account comments from previous consultations in writing the Final Draft Local Plan

To accompany the Suffolk Coastal Final Draft Local Plan document



December 2018



# Contents

1. Introduction .....	1
2. Who we Consulted.....	3
3. How they were consulted .....	5
4. How we took comments into account from the Issues and Options for the new Suffolk Coastal Local Plan (2017) Consultation.....	12
5. How we took comments into account from the First Draft for the new Suffolk Coastal Local Plan (2018) Consultation .....	557
1 Introduction.....	557
2 Wider Strategic Planning Area .....	573
3 Suffolk Coastal Spatial Strategy.....	584
4. Economy .....	630
5 Housing.....	659
6 Tourism.....	704
7 Transport .....	720
8 Community Facilities and Assets .....	730
9 Climate Change.....	739
10 Natural Environment.....	759
11 Built Environment .....	775
12 Area Specific Strategies.....	792
13 Delivery and Monitoring Framework .....	1010
14 Infrastructure Delivery Framework .....	1012
Appendix B.....	1019
Appendix C.....	1020

Appendix D .....	1021
Appendix E .....	1022
Appendix F .....	1023
Appendix G .....	1024
Appendix H .....	1025
Appendix I: Alternative Sites .....	1026
Appendix I – Schedule of new and amended sites submitted through First Draft Local Plan consultation .....	1154
Analysis of Responses to Questions on Preferred Options Sustainability Assessment and Habitats Regulations Screening Assessment.....	1158
Habitats Regulations Assessment .....	1158
Sustainability Assessment .....	1162

# 1. Introduction

This document provides an analysis of the consultations which took place during Summer/Autumn 2017 known as the 'Issues and Options for the Suffolk Coastal Local Plan Review' and the 'First Draft Local Plan' consultation during Summer/Autumn 2018. These documents were published in line with Regulation 18 of the Town and County Planning (Local Planning) Regulations 2012. This document explains how the Council has taken the responses to these consultations into account when preparing the Final Draft Local Plan.

This document outlines the consultation periods undertaken in accordance with the Suffolk Coastal Statement of Community Involvement (2014) and also fulfils the requirements under Regulations 17 and 19 of the Town and County Planning (Local Planning) Regulations 2012 for the publication of a statement to this effect.

As part of the review of the Suffolk Coastal District Council Local Plan, the Council undertook work to identify sites that have the potential for new development between Monday 19th September – Friday 28th October 2016. This included new housing (5+ dwellings), employment and industrial, retail, community facilities, open space and more.

To help publicise the call for sites all town and parish councils, as well as adjoining parish councils, and landowners of previously submitted sites were notified. The call for sites was also promoted on the Council's website, and in local libraries. Sites received were included in the first consultation on the new Local Plan in early 2017.

The consultation on the '**Issues and Options for the Suffolk Coastal Local Plan**' marked the first formal stage of consultation on the new Local Plan and invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public.

A ten week consultation took place between 18 August and 30 October 2017. In total 678 individuals and organisations responded to the consultation. Between them they made 6,930 comments. 6,024 of these comments were made on the questions in consultation document. The other 906 comments were made on the potential sites for development which were also part of the consultation.

Full copies of the responses can be viewed by question/site or by respondent at <http://consult.suffolkcoastal.gov.uk/consult.ti/Issuesandoptions2017/viewCompoundDoc?docid=9052404>

The '**First Draft Local Plan**' consultation invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public.

An eight week consultation took place between 20 July and 14 September 2018. In total 1,522 individuals and organisations responded to the consultation. Between them they made 3,731 comments. 3,386 of

these comments were made on First Draft Local Plan consultation document. A further 175 comments were made on the alternative sites considered, 100 comments were made on the Interim Sustainability Appraisal and 70 comments were made on the Habitats Regulations Screening Assessment which were also part of the consultation.

Full copies of the responses can be viewed by question/site/policy or by respondent at <http://consult.suffolkcoastal.gov.uk/consult.tj/LPRPO2018/consultationHome>

This document sets out who was consulted and how they were consulted at each stage. It summarises the responses and details how the Council took those comments into account when formulating the strategy, policies and proposals in the Local Plan. The document also summarises the comments made on potential site options together with summaries of the site assessments undertaken by the Council which have helped inform which sites to include in the Local Plan.

# 2. Who we Consulted

## Who was consulted

- **Issues and Options for the Suffolk Coastal Local Plan; and**
- **First Draft Local Plan consultations**

### Specific consultation bodies

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

### 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

Examples include:

Aldeburgh Society  
 Alde and Ore Estuary Partnership  
 Associated British Ports  
 Community Action Suffolk

Deben Estuary Partnership  
Fields In Trust  
Felixstowe Chamber of Commerce  
Greater Anglia Ltd  
Home Builders Federation  
New Anglia Local Enterprise Partnership  
Norfolk & Suffolk Gypsy Roma and Traveller Service  
Sport England  
Suffolk Coast & Heaths AONB  
Suffolk Constabulary  
Suffolk Fire and Rescue Service  
Suffolk Preservation Society  
Suffolk Wildlife Trust  
Theatres Trust  
The Woodland Trust  
Woodbridge Chamber of Trade & Commerce

**Other individuals and organisations**

Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, land owners and others on the Local Plan mailing list.

# 3. How they were consulted

## Public exhibitions

### Issues and Options for the new Suffolk Coastal Local Plan (2017)

Location	Date/time
Yoxford Village Hall (main hall)	Monday 11th September 16.00-19.30
Tower Hall, Rushmere St Andrew	Thursday 14th September 16.00-19.30
Felixstowe Town Hall (Council Chamber)	Monday 18th September 16.00-19.30
Suffolk Coastal District Council (Deben Room)	Tuesday 26th September 16.00-19.30
Wenhaston Village Hall	Wednesday 27th September 16.00-19.30
Kirton Recreation Ground (The Pavilion)	Monday 2nd October 16.00-19.30
Riverside Centre	Wednesday 11th October 16.00-19.30

### First Draft Local Plan (2018)

Location	Date/time
Kirton Recreation Ground (The Pavilion)	Tuesday 24th July 16.00-19.30
Saxmundham Market Hall	Tuesday 31st July 16.00-19.30
Felixstowe Town Hall (Council Chamber)	Thursday 2nd August 16.00-19.30
Suffolk Coastal District Council (Deben Room)	Monday 6th August 16.00-19.30
Wenhaston Village Hall	Wednesday 8th August 16.00-19.30
Rushmere St Andrew Village Hall	Thursday 16th August 16.00-19.30
Yoxford Village Hall (Main Hall)	Thursday 23rd August 16.00-19.30

## Presentations, meetings and workshops

### Issues and Options for the new Suffolk Coastal Local Plan (2017)

Audience	Date/time
Town and Parish Councils (early engagement)	Workshop 1 - Friday 19th May 2017 Deben Conference Room, East Suffolk House – 10:00 - 12:00 Workshop 2 - Monday 22nd May 2017 Kirton Recreation Ground – 15:00 - 17:00 Workshop 3 - Thursday 25th May 2017

<p>Town and Parish Councils*</p>	<p>Saxmundham Market Hall – 15:00 - 17:00                  Workshop 4 - Tuesday 30th May 2017                  Dennington Village Hall – 10:00 – 12:00                  Workshop 5 - Friday 2nd June 2017                  Kesgrave Community Centre – 10:00 – 12:00</p> <p>Tuesday 19th September 10.00 – 17.00                  Wednesday 20th September 10.00 – 17.00                  Monday 25th September 12.00 – 17.00                  Thursday 28th September 12.00 – 17.00                  Friday 29th September 12.00 – 17.00                  Tuesday 3rd October 12.00 – 17.00                  Thursday 5th October 10.00 – 13.00                  Monday 9th October 17.00 – 18.00                  Tuesday 10th October 10.00 – 17.00                  Friday 13th October 10.00 – 11.00                  Monday 16th October 10.00 – 17.00                  Wednesday 18th October 10.00 – 17.00                  Thursday 19th October 11.00 – 13.00                  Friday 20th October 11.00 – 12.00                  Wednesday 25th October 11.00 – 12.00 &amp; 15.00 – 16.00                  Friday 27th October 11.00 – 12.00</p>
<p>Members Briefing (SCDC Offices)</p>	<p>Thursday 17th August 2017</p>
<p>Local Plan Working Group</p>	<p>Thursday 6th July 2017                  Thursday 10th August 2017                  Friday 15th September 2017                  Thursday 12th October 2017</p>
<p>East Suffolk Developers Forum</p>	<p>Friday 14th July - 8-30 - 10-30</p>

## First Draft Local Plan (2018)

Audience	Date/time
<p>Town and Parish Councils*</p>	<p>Wednesday 25th July 12.00 – 17.00                  Wednesday 1st August 12.00 – 17.00                  Tuesday 7th August 12.00 – 17.00                  Friday 10th August 09.00 – 14.00                  Monday 13th August 12.00 – 17.00                  Tuesday 14th August 12.00 – 17.00</p>

	Friday 17th August 09.00 – 14.00 Monday 20th August 12.00 – 17.00 Tuesday 21st August 12.00 – 17.00 Friday 24th August 09.00 – 14.00 Tuesday 28th August 12.00 – 17.00 Thursday 30th August 09.00 – 14.00
Members Briefing (& Parish Council Briefing) (SCDC Offices)	Wednesday 18th July 2018
Local Plan Working Group	Thursday 9th November 2017 Thursday 7th December 2017 Friday 27th July 2018 Thursday 6th September 2018

\* all town and parish councils were offered the opportunity to attend a 1-2-1 session with planning officers to discuss the Local Plan.

## Media and publicity

### Issues and Options for the new Suffolk Coastal Local Plan (2017)

Posts and updates on Twitter, Facebook and LinkedIn.

Council press release “Views sought on future plans for district” issued Friday 18 August

Media	Details
<b>20 June 2017</b>	
Facebook & Twitter	July edition included a section on the Local Plan review, including how to register for updates
<b>18 August 2017</b>	
Facebook & Twitter	“Help plan the future of the District” Suffolk Coastal Local Plan Issues and Options consultation document published for 10 weeks
<b>23 August 2017</b>	
Facebook & Twitter	What are the key planning issues facing Suffolk Coastal – we want to know your views as part of the Local Plan consultation.
<b>25 August 2017</b>	
Facebook & Twitter	Tell us about your vision for your area as part of the Local Plan Issues and Options consultation.
<b>03 September 2017</b>	
Facebook & Twitter	How many homes and jobs should the Council plan

	for in its Local Plan?
<b>09 September 2017</b>	
Facebook & Twitter	Local Plan Drop in session being held at Yoxford Village Hall on Monday 11th September( 4-7.30pm)
<b>12 September 2017</b>	
Facebook & Twitter	Local Plan Drop in session being held at Tower Hall, Rushmere on Thursday 14th September (4-7.30pm)
<b>15 September 2017</b>	
Facebook & Twitter	Local Plan Drop in session being held at Felixstowe Town Hall on Monday 18th September (4-7.30pm)
<b>19 September 2017</b>	
Facebook & Twitter	How should the Council distribute housing and jobs across the district up to 2036?
<b>25 September 2017</b>	
Facebook & Twitter	Local Plan Drop in session being held at East Suffolk House, Melton on Tuesday 26th September (4-7.30pm)
<b>26 September 2017</b>	
Facebook & Twitter	Local Plan Drop in session being held at Wenhaston Village Hall on Wednesday 27th September (4-7.30pm)
<b>30 September 2017</b>	
Facebook & Twitter	Local Plan drop in session being held at Kirton Recreation Ground on Monday 2nd October 2017 (4-7.30pm)
<b>03 October 2017</b>	
Facebook & Twitter	Tell us what infrastructure is required to support the future growth of the area?
<b>09 October 2017</b>	
Facebook & Twitter	Local Plan drop in session being held at the Riverside Centre, Stratford St Andrew on Wednesday 11th October (4-7.30pm)
<b>12 October 2017</b>	
Facebook & Twitter	Suffolk Coastal is well placed to take advantage of ambitious economic opportunities. How can the Local Plan maximise these opportunities?
<b>17 October 2017</b>	
Facebook & Twitter	Tourism is important for the Suffolk Coastal economy, including beaches, family attractions, landscapes and heritage. How can the Local Plan further support local tourism?
<b>20 October 2017</b>	

Facebook & Twitter	Improving access to leisure facilities can help maintain a high level of health and well being across the district and the Local Plan can deliver healthy communities.
<b>24 October 2017</b>	
Facebook & Twitter	Suffolk Coastal has a dynamic coastline, estuaries and low lying areas at risk from flooding, see how the Local Plan can manage these areas.
<b>30 October 2017</b>	
Facebook & Twitter	Local Plan consultation ends at 23.45, submit your comments to the Issues and Options document today if you haven't already.

During the consultation period, a number of town and parish councils included information about the new Local Plan/Options consultation on their websites

## First Draft Local Plan (2018)

Posts and updates on Twitter, Facebook and LinkedIn.

Council press release "Suffolk Coastal – First Draft Local Plan Published" issued Friday 20 July.

Media	Details
<b>20 July</b>	
East Suffolk Website	'Suffolk Coastal – First Draft Local Plan Published'
<b>27 July</b>	
Facebook, Twitter & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & Local Plan Drop in session being held at Saxmundham Market Hall on Tuesday 31st July (4-7.30pm)
<b>31 July</b>	
Facebook, Twitter & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & Local Plan Drop in session being held at Saxmundham Market Hall on Tuesday 31st July (4-7.30pm)
<b>02 August</b>	
Facebook & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & updates on current and forthcoming public drop in sessions
<b>06 August</b>	
Facebook, Twitter & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & Local Plan Drop in session being held at East Suffolk House on Monday 6th August (4-7.30pm)
<b>09 August</b>	

Facebook, Twitter & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & updates on current and forthcoming public drop in sessions
<b>10 August</b>	
Facebook, Twitter & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & Local Plan Drop in session being held at Rushmere St Andrew Village Hall on Thursday 16th August (4-7.30pm)
<b>17 August</b>	
Facebook & LinkedIn	'Have your say on Suffolk Coastal's First Draft Local Plan' & updates on current and forthcoming public drop in sessions

## Consultation and publicity materials

### Issues and Options for the new Suffolk Coastal Local Plan (2017)

Materials	Details
Issues & Options document "Help Plan the future of the District - Issues and Options"	PDF version on website Consultation portal version on website Hardcopies provided to Town and Parish Councils Copies available at Council offices, libraries, exhibitions
Information leaflet "Help Plan the future of the District - Issues and Options"	Distributed to the public at public drop in's, Council offices, local libraries, doctors surgeries & dental surgeries
Comments Form	Available as part of the exhibitions
Consultation poster included exhibition details	Hardcopies provided to Council offices, libraries Town and Parish Councils
Sites consultation poster "Help plan the future of the District"	Hardcopies provided to Town and Parish Councils with consultation web address and dates and venues for public drop in sessions
Consultation letters/emails	Sent to those on the Local Plan mailing list comprising specific consultation bodies, general consultation bodies, other organisations and individuals
SCDC social media feeds	Various news feeds throughout the consultation, including boosted posts on Facebook which

	targeted those under 40 within the district.
--	--

## First Draft Local Plan (2018)

Materials	Details
Suffolk Coastal Local Plan, First Draft Plan and Appendices	PDF version on website Consultation portal version on website Copy provided to Town and Parish Councils Inspection copies available at Council Offices, Woodbridge Customer Service Centre, libraries, exhibitions
A3 leaflet "First Draft Local Plan"	Distributed to the public at public drop in's, Council offices, local libraries, doctors surgeries & dental surgeries
Comments Form	Available at the exhibitions and online
Site notices	Site notices placed on boundary/vicinity of each proposed site allocation
Story map summary	Interactive summary of the Local Plan on website
Consultation poster detailing public drop in sessions	Copies provided to Town/Parish Councils, libraries
Consultation letters /emails letter sent at consultation start and reminder (email only) sent mid-consultation reminder	Sent to those on the Local Plan mailing list comprising specific consultation bodies, general consultation bodies, other organisations and individuals and landowners/agents of proposed site allocations and those sites not being taken forward
SCDC social media feeds	Various news feeds throughout the consultation, including boosted posts on Facebook which targeted those under 40 within the district.

# 4. How we took comments into account from the Issues and Options for the new Suffolk Coastal Local Plan (2017) Consultation

This section of the document explains how the Council took into account comments raised during the Issues and Options for the new Suffolk Coastal Local Plan (2017) Consultation when writing the First Draft Local Plan consultation (2018)

## Analysis of Responses to Questions on Issues and Options

### Key Issues

#### Q01 – Are there any other issues that the Local Plan should consider? (104 responses)

This question resulted in a mixture of responses that identify a number of issues relevant to individual communities and stakeholders across the District. However some common issues resulted including the need to provide and protect the natural environment and character of the District. Respondents identified the exceptional quality of the natural and historic environment and the importance of agriculture to the area both in terms of food production and employment opportunities in the rural areas. Respondents also identified that the separation of settlements is an important characteristic of the area and one which needs to be retained to ensure individual identities and preservation of the rural communities. Some comments highlighted that the level of development coming forward will destroy the character of the rural areas.

Increasing the provision of cycle paths across the District was supported by a number of respondents, as this will help integrate communities and provide opportunities for people to use alternative forms of transport. The contribution these cycle paths make to tourism opportunities was also acknowledged. Other types of infrastructure requirements raised included increasing provision of health facilities across the District, broadband provision to all communities, mobile signal, protection of groundwater sources, increased provision of woodlands and enhancement of biodiversity and habitats across the District.

Some respondents suggested that the Local Plan needs to consider employment and housing together to ensure that opportunities are in place for young people to remain in the area. As well as these opportunities, the Local Plan needs to recognise the changing nature of high streets and promote more boutique style shopping as well as places for leisure time such as eating and drinking. Increasing the places for eating, drinking and socialising will also reduce the level of isolation that in some instances is brought about by the lack of connectivity between areas and amenity uses.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan outlines a variety of key issues based on social, environmental and economic factors which have been identified through the Sustainability Appraisal Scoping Report. Consultation responses have influenced the Scoping Report and the issues identified in the First Draft Plan. The First Draft Plan also includes a number of strategic objectives and priorities which have a clear relationship with the issues identified through the consultation.

## What is the vision for the Ipswich HMA and Ipswich FEA?

**Q02 – What are the advantages of your area that should be protected through local plans? (85 responses)**

- Communities to retain their individual character and not merge with neighbouring communities.
- District is an attractive place to live and work and the environment needs to be protected.
- Essential to retain the rural aspect of villages.
- Important for local communities to retain services and facilities.
- Villages (such as Trimley St Martin) should not become suburbs of neighbouring Towns.
- Retention and protection of the rural character between Ipswich and Felixstowe.
- Carefully considered and appropriate scale development in rural areas to be encouraged.
- Distinctive nature of villages within the setting of protected landscapes should be retained.
- Future development to be in keeping with the existing settlements.
- Protection of flora and fauna.
- Communities to be given time to settle following “new” developments
- Proximity of communities such as Leiston to the AONB.
- Rural tranquillity that promotes and attracts tourism.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a vision for Suffolk Coastal. This vision is based on the East Suffolk Business Plan but also informed by consultation responses which acknowledged the high quality built and natural environment as well as the need to retain local services and facilities. Consultation responses encouraged appropriate development in rural areas whilst maintaining their identity. The vision in the First Draft Plan seeks to ensure that communities have fulfilled their potential by the end of the plan period which supports the responses received.

**Q03 – What are the disadvantages of your area that the local plans could try to address through the way land is used or developed? (66 responses)**

- Poor digital infrastructure
- High levels of heavy and speeding traffic

- Poor public transport
- Lack of access to health and leisure facilities
- Houses that do not benefit local people – need more low cost housing and bungalows.
- High house prices driven by the second home market and level of tourism in the area.
- New executive unaffordable housing without adequate infrastructure and depopulation of rural villages.
- More space for business development.
- Parking at schools
- Traffic congestion in town centres
- Impact of Port of Felixstowe on quality of life for residents.
- Opportunities for bringing communities together will help build stronger communities.

*How these comments have been taken into account in the First Draft Local Plan:*

Some of the issues identified in response to this question echo the issues raised in the East Suffolk Business Plan and the Critical Success Factors outlined within that. The First Draft Plan contains a range of policies which seeks to address some of these issues. Consultation responses have highlighted the need for greater provision of digital infrastructure and the First Draft Plan includes a policy which takes a proactive approach to the delivery of this much needed infrastructure to support communities across the District. Housing policies seek to boost the supply of housing and target the needs of local people. Other issues identified are included within specific policies or included within Site Allocations as relevant.

**Q04 – What are the key priorities you would like to be addressed by 2036 - in the places across Ipswich and Suffolk Coastal where you live, work or study? (78 responses)**

- Improve traffic and transport infrastructure to reduce congestion.
- Quality homes which meets the needs of the local population. Concern about the amount of second homes across the District.
- Retention of existing services and facilities and ensure these remain viable.
- Protection of the natural environment and resist building in areas of high landscape quality and ecological value with good environmental practices and carbon neutral development.
- Recognition of the vital need to enhance and protect special areas from development.
- Improvements to the broadband services across the District.
- Enabling communities to have more control over what comes forward in their area, with a greater focus on building smaller and more affordable homes.
- Sensitive development in and on the edge of existing settlements that help to deliver additional services while supporting existing facilities.
- Provision of affordable and specialist housing in the rural areas.
- Keep the rural nature and character of the area by developing on brownfield sites and maintain woods, fields and open spaces.

*How these comments have been taken into account in the First Draft Local Plan:*

Policies in the First Draft Plan seek to address the key priorities identified through the consultation responses on issues such as landscape, digital infrastructure, design, character and provision of appropriate residential development. The First Draft Plan also provides a vision for specific areas which takes into account the constraints and opportunities for settlements which are based on consultation responses.

Additional evidence has been prepared in respect of Landscape Character and the Port of Felixstowe Study which were also informed by consultation responses.

Consultation responses have also informed discussions and engagement with service providers such as Suffolk County Council and NHS England throughout the plan preparation stages.

#### Q05 – What is your vision for the Ipswich HMA and Ipswich FEA by 2036? (38 responses)

- Focus on high quality developments which maintain and sustainably improve the area through appropriate development that takes into account the unique characteristics of the District.
- Provide opportunities for people to work and live and where businesses want to invest and innovate.
- Enable communities to thrive in a sustainable way by promoting homes and opportunities targeted at young, working age people.
- Support the county town
- Growth of the area to be considered across the full Housing Market Area.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a vision for Suffolk Coastal. This vision is based on the East Suffolk Business Plan but also informed by consultation responses which acknowledged the high quality built and natural environment as well as the need to retain local services and facilities. Consultation responses encouraged appropriate development in rural areas whilst maintaining their identity. The vision in the First Draft Plan seeks to ensure that communities have fulfilled their potential by the end of the plan period which supports the responses received.

A policy which outlines the growth requirements for Suffolk Coastal, based on evidence prepared across the Ipswich Housing Market Area and the Ipswich Functional Economic Area in conjunction with neighbouring authorities is included in the First Draft Plan. This policy and supporting text acknowledge the strong relationships between Suffolk Coastal and neighbouring authorities.

## A – How much growth? The number of homes and jobs that should be planned for

#### Q06 – Which growth scenario should we plan for across the Ipswich Housing Market Area? (163 responses)

A mixed response to this question with a variety of views expressed by a range of organisations acting on behalf of landowners and the development industry, as well as many comments received from members of the public and Town and Parish Councils. Those who indicated that the baseline figures should be planned for outlined that higher levels of growth would be excessive, detrimental to the environment and the existing communities as well as “risky” in respect of the uncertainties surrounding national issues such as Brexit.

The development industry and those with land interests tended to favour the highest scenarios for growth as this would present greater opportunities for development across the District as well as significantly boosting the supply of housing that is delivered over the plan period. Many respondents make clear links between the higher levels of growth and the benefit this will bring to

the local economy as well as seeking to rebalance the increasing ageing population with more opportunities for homes targeted at younger people to ensure they remain in the area.

Comments received from Town/Parish Councils and members of the public generally supported the introduction of the baseline scenario. Comments highlighted that this would meet the needs of the existing population and would be based on robust evidence. High house prices and increased numbers of people moving into the District were identified as reasons to only restrict planned growth to that seen as the baseline. Many respondents also suggested that growth which is above the baseline figure is likely to be detrimental to the natural environment which is important to preserve for the overall benefit this brings.

Comments were also received which supported Scenario B, as this option was considered to be more realistic and offered a level of flexibility. Responses highlighted that Scenario B could help deliver an increased number of units that are required but also protect the natural environment by not introducing too many units too quickly, but enables the balance between economic ambition, housing delivery and protection of the environment to be achieved.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes policies outlining an ambitious growth strategy focussed on economic and infrastructure led approach with a housing requirement above that outlined in the SHMA as well as the Government's standard methodology. The Issues and Options consultation document detailed scenarios based on the evidence available at the time. During the consultation the Government introduced standard methodology figures which have influenced the First Draft Plan.

Consultation responses supported an increase in growth aspirations where these provided the necessary infrastructure and associated opportunities such as economic growth whilst maintaining the protection of the natural, built and historic environment.

The First Draft Plan outlines a growth strategy which provides a balance between the delivery of necessary infrastructure, economic growth and an ambitious housing target. The ambitious housing target is intended to support the delivery of infrastructure but also ensure that the Council guides the future development of communities across the District, by bringing forward developments in a plan led manner through the Local Plan.

**Q07 – Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outlined above - either higher or lower? (59 responses)**

Many of the responses to this question highlighted that the SHMA figures are different from those included within the Government's recent consultation on standardising housing methodology across the country. The Council acknowledge this consultation document and will look to reflect the government figures following the consultation in future documents. Comments from the development industry highlighted the ambitious economic plans that are published by New Anglia LEP and how the housing targets need to reflect these aspirations.

Comments from the local community highlighted the uncertainty surrounding Brexit and how this might have an impact on forecasts and evidence projections in the short to medium term.

Various Town and Parish Councils highlighted local evidence relevant to their community, such as the declining population that was seen from 2001-2011 as well as specific Housing Needs Assessments undertaken on a Parish level.

*How these comments have been taken into account in the First Draft Local Plan:*

The Council acknowledges the difference between the SHMA figures and the Government's Standard Methodology figures in the First Draft Plan, but seeks to set an ambitious housing requirement which is in excess of each of these figures. The ambitious housing target is based on a vision which seeks to promote economic growth and infrastructure delivery alongside residential development across the District.

Any housing requirement is to be viewed as a minimum and therefore it is not appropriate to take a conservative approach as this will not deliver the Council objectives in respect of the economy and infrastructure provision. Issues in respect of Brexit will be kept under review through monitoring and demographic forecasting which will inform future Local Plan Reviews.

**Q08 – Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided? (59 responses)**

A variety of comments to this question which range from respondents supporting the proposal of welcoming growth if infrastructure is provided, to respondents who are clearly against the suggestion. Many of the negative responses outlined that the existing infrastructure is already at capacity or over stretched and therefore not fit for purpose. Introducing more growth into these areas is seen to be worsening the current situation which is not acceptable to the communities that provided responses.

A limited number of responses outlined that their community would be likely to accept further growth but only where particular provision is made in respect of traffic, roads and highways as well as utility and communications services.

Many of the responses were provided by members of the public and Town/Parish Councils. Some responses were received from the development industry or those with land interests but the overwhelming majority of the comments received can from the local community and residents of the area.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan outlines an ambitious housing requirement with the clear intention of significantly boosting the supply of new homes across the District linked to the increased provision of infrastructure to serve the needs of existing and new communities. Site allocations and policies include infrastructure requirements and these are collated in the Infrastructure Delivery Plan which is included within the First Draft Plan.

The provision of Infrastructure across the District is crucial to the success of the First Draft Plan. The Council in partnership with service providers will seek to deliver services and facilities over the plan period through the Community Infrastructure Levy and site specific proposals.

**Q09 – What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or sustainable transport infrastructure (public transport, park and ride, cycling), or both? (62 responses)**

The majority of responses to this question supported the proposal for a route to the north of Ipswich to ease the reliance on the Orwell Bridge and the A14. Other common issues identified included the

need to improve the public transport opportunities and linkages across the District so that communities have realistic alternatives to the motor car. Improving the public transport services along with cycle routes can also help improve opportunities across the area.

Some respondents also highlighted the need to direct investment into the rail network to improve the capacity for freight and customer services along the Felixstowe branch and the East Suffolk branch. Improving stations and access to these is seen as a potential way to ease the reliance on the road network.

Key junctions such as the Melton cross roads, Seven Hills and A12/A14 were identified as areas that need improved capacity and respondents highlighted that these are essential to improve the quality of life within the District.

*How these comments have been taken into account in the First Draft Local Plan:*

Support for an Ipswich Northern Route has been identified in Chapter 2 of the plan in policy SCLP2.2 and the supporting text. Policy SCLP2.2 also identifies support for improvements to junctions on the A14 and A12 and sustainable transport. Policy SCLP7.1 Sustainable Transport seeks to ensure that infrastructure for cycling and walking is integral to new development.

**Q10 – Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure? (36 responses)**

The majority of responses to this question were received from members of the public and Town/Parish Councils. Very limited response from the development industry. A mixed response to this question, with some community responses supporting the idea of planning a scale of development to help address the issues of the Orwell Bridge being closed due to bad weather and or accidents. Responses from communities to the east of the Orwell Bridge highlighted that these areas are already suffering from the over reliance and traffic on the A14 and the Orwell Bridge. Some consultation responses highlighted that authorities should look at opportunities to upgrade and improve the Orwell Bridge as this is seen as a cheaper alternative. Examples of the Queensferry Bridge in Scotland were highlighted.

The majority of consultation responses considered that issues surrounding the bridge were not a reason for a large scale of development to be planned for across the Housing Market Area. Responses highlighted that any closures are generally for a short period and that issues surrounding the bridge and resilience need to be overcome before any further development is planned.

*How these comments have been taken into account in the First Draft Local Plan:*

Support for an Ipswich Northern Route has been identified in Chapter 2 of the plan in policy SCLP2.2 and the supporting text. The Council anticipates that the next review of the Local Plan will examine route options in more detail.

**Q11 – Do you agree that providing a high growth scenario would help to deliver the affordable housing required? (62 responses)**

Many of the responses received from the development industry highlighted that a high growth scenario should be implemented to help deliver the affordable housing required. Developers indicated that a higher housing target will ensure that more affordable housing is delivered across

the District. Suggestion that the Council adopts a two tier approach to affordable housing with a lower delivery targeted on smaller sites, balanced against a higher target on larger/strategic sites.

The majority of responses were received from the local community, a mixture of individual residents and Town/Parish Councils. Many of these responses highlighted that it would be inappropriate to target a higher scenario to help deliver affordable housing. A common response was that the Council should enforce policies and requirements more strictly to ensure that affordable housing is delivered on a site and that developers are not given the opportunity to wriggle out of their requirements and leave delivery unfulfilled.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan aims to deliver an ambitious housing requirement which is broadly equivalent to 20% above OAN, the mid-range number proposed in the Issues and Options consultation. Viability testing of Policy SCLP5.10 Affordable Housing on Residential Developments will be undertaken before the Local Plan is finalised, in order that the requirement contained in the final plan is considered viable. However, site specific circumstances may lead to a lower level of provision in individual circumstances.

#### **Q12 – Are there alternative scenarios which should be considered?** (34 responses)

A limited number of responses were received to this question with a wide variety of alternative scenarios suggested. Some support for the creation of a new town but this needs to be balanced with the need to conserve and retain the natural environment.

Many of the suggestions focussed on improving infrastructure such as broadband, schools and public transport as well as increasing the number of new build homes and properties that offer smaller types of accommodation which are targeted at younger people or those wishing to downsize later in their life.

*How these comments have been taken into account in the First Draft Local Plan:*

Whilst the draft Local Plan does not propose a new town/settlement, it does propose two new Garden Neighbourhoods (at South Saxmundham and North Felixstowe) which provide opportunities for delivery of key infrastructure. The Housing Mix policy (SCLP5.8) sets out requirements to deliver a mix of housing types and sizes and the site allocation policies specify certain types of housing (for example self build or housing for older people) where appropriate to the site and location.

## **B - Where should the growth go?**

#### **Q13 – Which distribution options do you think would be most appropriate to take forward?** (172 responses)

A wide variety of responses to this question with many respondents being able to clearly identify a preference (from those given), whilst many others highlighted that there needs to be a blend of the options presented. Option 4 (continuation of existing strategy) and Option 5 (Focus on Ipswich and A14) were the most popular distribution in terms of number of responses received. However the majority of responses suggested a more refined and varied strategy which takes into account the needs of communities.

There was support for directing more appropriate levels of growth to the rural areas of the District based on the size of the existing settlement. Introducing a distribution which supports growth in the rural areas is seen by many respondents as a way to maintain these communities and support the existing services and facilities. It is also clear from respondents that any distribution needs to ensure settlement coalescence does not occur and that individual communities maintain their identity and distinctiveness.

Many respondents provided suggestions on the distribution based on either the sites they are promoting (such as agents and developers) or the distribution which has the least impact on their community (Parish Council in the north of the District supporting an Ipswich focus distribution). It is also noted that comments received from statutory bodies or service providers such as Anglian Water do not indicate any preference to the distribution at this stage.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan proposes a spatial distribution which is different from those outlined in the Issues and Options document. The options consulted upon were intended to provide distinct alternatives and generate debate to inform future considerations. The consultation responses did not provide a clear preference as the feedback was mixed and in some instances proposed different distributions.

The First Draft Plan proposes a distribution which seeks to direct growth to the rural areas as well as Saxmundham and Felixstowe that seeks to protect the identity of individual communities.

**Q14 – Are there any other distribution options that the Councils should consider, including across the whole of the Ipswich Housing Market Area? (37 responses)**

A limited number of responses were received to this question but many of the respondents promoted the idea of more growth in the rural areas so that the distribution is more evenly spread across the District. Focusing growth around transport corridors and rail links such as the A12 and A14 was also proposed by some respondents as well as the proposal to build a new community with new infrastructure was also highlighted as an alternative to consider.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a spatial distribution which promotes growth in rural areas as well as Saxmundham and Felixstowe with a focus on the A12 communities. The distribution is considered to spread the development to a larger number of settlements than the current Local Plan.

**Q15 – Should the spatial distribution of jobs growth align with housing growth or should we take a different approach which focuses on improving accessibility between homes and work places? (48 responses)**

Respondents to this question were mainly from the local community in the form of members of the public and Town/Parish Council. The responses generally highlighted that there needs to be alignment between jobs and housing, but with a focus on main transport corridors and other locations which reduce the need to travel or provide alternatives to the private motor car. Respondents outlined that it is not always achievable to provide jobs and housing in the same location but recognised that this is not always achievable and decision makers need to be realistic but seek to minimise car journeys and safeguard the environment. It is acknowledged in some

responses that people tend to commute longer distances based on choice of job and choice of homes which can make it difficult to align job and housing distribution and growth.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan identifies employment allocations well related to the A14 and A12 which reflects consultation responses and market demand evidence published in the Ipswich Economic Area Sector Needs Assessment. The Garden Neighbourhoods at Saxmundham and Felixstowe also require employment provision as part of a comprehensive master plan for these settlements. The provision of employment sites as part of a comprehensive master plan will provide greater economic opportunities across the District in locations well related to communities.

Economic policies in the First Draft Plan also encourage greater flexibility in respect of expansion of existing employment sites to provide more opportunity for economic activity well related to existing communities.

**Q16 – Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially? (23 responses)**

The majority of responses to this question highlighted that they did not have any evidence to relate to this issue and therefore provided no comments. Of those that provided comments, it was highlighted that some areas may be able to accommodate higher density development, whilst other areas are unable to do so. Historic England outlined that they have commissioned research to better understand how high density development can be achieved in areas which are rich in heritage and historic assets. The emerging document can form part of the evidence base supporting the Local Plan Review.

*How these comments have been taken into account in the First Draft Local Plan:*

In allocating sites for housing, consideration has been given to the site specific circumstances in determining whether higher densities (than typical densities achieved in the past) may be appropriate. For example, the new Garden Neighbourhoods and larger developments should be able to accommodate high density dwellings such as apartments alongside lower level densities across the development, whereas the character of more rural locations would not suit such high densities.

**Q17 – Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land? (74 responses)**

The overwhelming majority of responses to this question highlighted that the existing policy should be maintained as this is fundamental to ensuring that communities retain individual character, identity and separation. Comments were received from members of the public, Town and Parish Councils who all considered that the separation between communities is essential and land in locations such as these should not be considered as a source of housing land.

Comments received from the development industry echoed the thoughts of the local community, but outlined that the Local Plan needs to be cautious and not just place an arbitrary and overly simplistic approach as this would be harmful and would not protect the most appropriate areas. It is therefore suggested that locations should be considered on a site by site basis with appropriate design influences to ensure that if required suitable locations are brought forward which also recognise the separation between settlements.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan seeks to retain the open and recreational spaces established through previous Local Plans on land between Ipswich and the village of Rushmere. Maintaining this area for a variety of open space and recreational uses ensures separation between Ipswich and Rushmere. The First Draft Plan also includes policies which respect landscape character and separation between settlements throughout the District.

Landscape evidence prepared following the Issues and Options consultation has also informed the First Draft Plan.

**Q18 – If development cannot be accommodated within Ipswich, should it be focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location? (57 responses)**

A mixed response to this question with many respondents outlining that if development cannot be accommodated within Ipswich, the growth should be distributed across the rest of the Housing Market Area to sustainable location which have employment opportunities and proximity to public transport.

A equally popular but contrary view was that the growth that cannot be accommodated in Ipswich should then be targeted to locations which are in close proximity to Ipswich to take advantage of existing services and facilities which can support the new and existing communities.

Respondents highlighted that the choice in respect of development needs to be guided by the principles of sustainable development primarily to ensure that appropriate sites come forward in a planned manner. Some respondents outlined that there is no evidence to suggest that Ipswich cannot accommodate its housing requirement and supported the greater provision of high density and high rise developments alongside bringing brownfield/vacant/redundant buildings back into use.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan provides an ambitious housing target which not only seeks to achieve Council objectives and deliver the infrastructure required but it also provides opportunity to provide residential units should Ipswich Borough not be able to meet its own needs. The Council has been working closely with Ipswich during the preparation of the First Draft Plan and have taken the view that any need not met within Ipswich is best distributed across the Housing Market Area. Further details of the partnership working between authorities is outlined in the First Draft Plan and the draft Statement of Common Ground that is being prepared for the Housing Market Area.

The First Draft Plan limits the amount of development proposed for the communities neighbouring Ipswich and instead locates it to areas which are easily accessible through road and rail connections.

The Council will continue to work with Ipswich Borough as their Local Plan progresses.

**Q19 – Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target? Where should the Council prioritise protecting employment land? (28 responses)**

A mixed response to this question but the majority of respondents highlighted that a cautious approach is needed when considering the switch from employment land to residential use. Many

respondents highlighted that Ipswich is a key driver of the local economy and therefore it is essential that enough employment land is retained to support the existing economic activity. Retaining employment land provides opportunities for businesses to be ambitious and realise aspirations without moving away from the area. A particular focus needs to be on those employment sites which are in sustainable locations such as close proximity to public transport and provide opportunities for walking and cycling.

A limited number of responses outlined that the housing need is the most important aspect and through redevelopment and intensification of sites proposed for allocation for employment use, Ipswich may be able to fulfil their housing requirement without taking up any land in Suffolk Coastal (or neighbouring authorities).

*How these comments have been taken into account in the First Draft Local Plan:*

These comments have been provided to Ipswich Borough who are now undertaking a plan for their administrative area. Original proposals for a joint/aligned Local Plan have now been modified although individual authorities are working towards similar timetables.

Issues in respect of Ipswich Borough will be considered in the Local Plan produced by the Borough Council.

**Q20 – Is there other land within Ipswich Borough which should be considered for residential development? Is the approach to protecting open space the right one? (32 responses)**

A limited number of responses to this question but the majority outlined that open spaces should be retained and given the relevant protection to maintain a high quality of life and support well-being of residents. The respondents generally agreed that it is vital for parks to be maintained but suggested that other forms of open space which are redundant or not being used could be suitable for further development if required.

*How these comments have been taken into account in the First Draft Local Plan:*

These comments have been provided to Ipswich Borough who are now undertaking a plan for their administrative area. Original proposals for a joint/aligned Local Plan have now been modified although individual authorities are working towards similar timetables.

Issues in respect of Ipswich Borough will be considered in the Local Plan produced by the Borough Council.

**Q21 – Where do you think the most appropriate locations are to meet this need? (31 responses)**

A variety of responses to this question with the majority coming from members of the public or Town/Parish Councils. Very limited response from the development industry or those promoting sites as part of the Local Plan process.

In respect of sites for gypsy, travellers and travelling show people – the respondents highlighted that any site needs to be well located and related to existing services and facilities such as schools, public transport and medical provisions. Being in close proximity and in reasonable distance to transport networks is also seen as a key requirement with regards to any future provision. The responses also outlined that provision should be distributed across the District to provide choice and opportunity.

Locations highlighted for boat dwellers were identified as Woodbridge and Felixstowe Ferry to reflect the moorings currently seen as well as other locations on the River Deben and the River Alde. One respondent highlighted that the Orwell is not likely to be a suitable location for houseboats due to the commercial uses which still operate on the Orwell.

*How these comments have been taken into account in the First Draft Local Plan:*

A criteria based policy (SCLP5.17) is proposed which includes a requirement that new sites for Gypsies and Travellers to be well related to a Major Centre, Town, Large Village or Small Village.

Policy SCLP 5.15 relates to houseboats and is accompanied by mapped areas of existing houseboats. These areas were identified in discussion with the Deben Estuary Partnership, through site visits and through analysis of maps. Existing areas of houseboats identified include both Woodbridge and Felixstowe Ferry. Under Policy SCLP 5.15 additional and replacement houseboats will be permitted in these areas.

## C - The provision of retail and leisure development

*Please also see Town Centres, Retail and Commercial Leisure section*

### Q22 – Which town centres should we plan to expand? (48 responses)

Improve rather than expand especially Ipswich and Saxmundham Town centres. Don't emulate larger population areas by creating large traditional retail outlets. Support low environmental impact internet based businesses to revitalise Ipswich centre's appeal that is key to addressing retail growth pressure at Martlesham. Address parking, cleanliness, park & ride, seating, toilets and crime in relation to retail facilities. There is a contrast between supermarket provision and broader town centre appeal in Felixstowe and Saxmundham. Leiston can re-organise itself and grow – its present layout and infrastructure does not help it. Perhaps expand Lowestoft or Felixstowe. Change, especially internet shopping and rolling out faster broadband around rural areas is 'dampening down' the need to plan for town centre shopping growth. Instead grow local retail close to new housing and employment development to reduce travel. Infrastructure investment choices can influence and be linked to growth. There are enabling development opportunities to support historic town centre buildings to adapt to changing shopping and leisure habits affecting them. Link large housing developments on town fringes to town centre leisure developments, building refurbishment and environmental improvements.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes minor updates to town centre boundaries, primary and secondary frontages except in Woodbridge because of the older nature of the existing policy. The approach in the First Draft Plan is not to seek to allocate sites for retail growth but to sustain and consolidate concentrations of shops and other main town centre uses in compact existing centres. Policies for new housing sites on the edge of settlements support green infrastructure connections to town and District centres.

### Q23 – Are there town centres that should be reduced in size? (21 responses)

Ipswich Town centre was the only one suggested for contraction with one comment saying "it is too straggly with too many empty shops". Once assets and infrastructure are in place and redundant, convert them for other uses such as housing, offices and recreational functions. Suffolk should not

be trying to emulate the larger population areas by creating large traditional retail outlets. Look to move the town centres into the 21st century and supporting more internet based businesses.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan does not allocate specific sites for new retail development. A variety of policies informed by consultation responses have been provided for town centres and employment areas which are informed by the evidence base which seeks to focus on the existing boundaries for town centres.

Comments in relation to Ipswich have been shared with Ipswich Borough Council for consideration within their emerging Local Plan.

**Q24 – Which sites should be identified through the Local Plan reviews for future retail growth? (23 responses)**

Reconcile demand in the Ipswich – Felixstowe – Woodbridge area with opportunities / constraints to retail / leisure development and town centre growth in this part of the District. Polarised responses on whether retail parks at Ransomes and Martlesham should grow. Consider sites that can enhance linkages, attractiveness and movement between supermarkets and other town centre areas in Saxmundham to serve its hinterland. Consider potential opportunities in Kesgrave (eg: for boutique retail). Reflect market demand and the ‘drive’ (dynamism) of centres in choosing allocation locations.

- Haven Exchange in Felixstowe should be retained for retail and / or leisure use where feasible.
- Derelict sites in Ipswich (eg: old law courts, police station, abandoned shops).
- New unoccupied commercial / employment units in Suffolk Coastal villages and towns. Boutique retail perhaps in Kesgrave, near existing retail areas (by library).
- ALDI have submitted a planning application at Gloster Road, Martlesham Heath, which could provide a discount supermarket in a location currently allocated as employment land.
- 

*How these comments have been taken into account in the First Draft Local Plan:*

Policy approaches support retail uses in Town, District and local centres. They reflect up to date evidence concerning the nature of functional economic relationships (eg: shopping patterns) with Ipswich Town centre (eg: shopping patterns). This First Draft Plan does not introduce any specific site allocations are made for new retail development. This First Draft Local Plan includes a dedicated policy in the retail and town centres section for Martlesham and Kesgrave addresses commercial uses in these areas.

**Q25 – How do we increase the range of uses or activities in Ipswich town centre, given its role as a regional centre, and what should they be? (26 responses)**

More could be made of the history and heritage of Ipswich. The historic lanes between the waterfront and town centre feel ‘too big’ (*so shared space / imaginative public realm ideas?*). Give it a more upmarket feel and profile by making use of and connections with existing heritage, leisure and cultural assets in the town and surrounding area. For example, complimentary Modern Art Gallery, film hub and sport facilities. Promote green travel, green public spaces, and activities that bring people together and help with the overall health of the population. Particular suggestions include some sort of pedestrian way down to the waterfront. Make the park and rides and cycling

more efficient. Make access to the town centre easier for the residents of rural Suffolk. Ease the congestion by building more bridges over the Orwell a northern bypass, more and cheaper car parks. Facilities in Ipswich are too spread out. Discourage out of town retail developments. Ipswich is hard to get into from anywhere other than the surrounding town itself or 'suburbs' connecting to the centre. It is a big town, with potential but until real measures are taken to allow easily reliable access, parking etc, the uses and activities provided may not be taken up.

*How these comments have been taken into account in the First Draft Local Plan:*

Comments in respect of this question have been shared with Ipswich Borough Council and will inform the emerging Local Plan for Ipswich.

**Q26 – What range of uses or activities would you like to see in the smaller town centres? (34 responses)**

Appeal to residents and visitors in terms of experience and essentials like a bank and pharmacy. Direct professional service (A2) uses to town centre, local / District centre and edge of centre locations because this diverse service and employment sector is growing whilst traditional banking services provided on the high street are contracting. Saxmundham's situation presents opportunity for a more accessible leisure centre than the one in Leiston. A choice of commercial leisure venues is required in order to suit different age ranges and cater for diverse preferences. People should not have to routinely leave town to get their entertainment. More public seating and gathering places for entertainments of various kinds are needed. Town centres in Suffolk Coastal are suited to fashion, beauty, art, boutiques, cookery, independent retailers with specialist expertise and products. Town centres should be developed in accordance with their own local character with a strong sense of place and as destinations in their own right. Flexible approaches could help local Town centres be opportunistic in responding to meet the demands of the people living in them, to social and economic trends, signals and encouraging evolving interactions between land uses. Car parking as a key land use is significant and a lack of land for car parking around Framlingham Town centre affects its ability to grow and evolve. There are components of retail provision that are absent from Woodbridge and some other market towns. In particular, provision needs to be made for discount food stores. Towns need to not just provide the daily basics, but encourage visiting, such as having ample parking, and be pleasant to walk around.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses highlighted the variety of uses that are to be encouraged within town centres across the District. The First Draft Plan includes policies for town centres that support a concentration of a broader range of leisure, cultural and social uses in town centres. Town Centre policies specifically address town centre environments including encouraging people to spending time in them and supporting inclusive accessibility to, from and around them.

**Q27 – What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres? (45 responses)**

Out of town shopping can undermine local smaller scale enterprises but there are significant distances between Martlesham and some Suffolk Coastal market towns. The choice context for leisure like swimming or a sporting activity may affect people without a car more in locations with a lack of daytime and evening public transport. It may be unrealistic to accommodate bulky goods retail in town centres due to distance between shops and car parking.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a retail hierarchy which will help guide future considerations in respect of uses to be encouraged within existing town centres and how these are balanced with out of centre shopping / retail parks. The First Draft Plan provides a policy approach which reflects the role of out of centre retail at Martlesham and supports commercial leisure uses in the town centres across the District.

**Q28 – Should the existing retail parks be considered in their own right, or should town centres continue to be the first choice location for new shops and leisure uses? (44 responses)**

Town centres should be the first choice for new shops and leisure uses. Embrace the established function of Martlesham and plan positively in accordance with the NPPF by making site allocations for new retail provision. Differences between out of town retail parks and town centres means policy need to be very careful not to be detrimental to either of them. Need policy approaches for distinct established retail destinations, both town centre and out of town. Vacant units at retail parks may be unsuitable for change of use to leisure. Use vacant larger stores in town and out of town for indoor markets. Separation of retail showroom, storage and collection premises presents opportunity for bulky goods customer collection in accessible community hub locations in town and out of town.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan provides policy approaches for distinct town centres and established retail destinations reflect the established function of out of centre retail at Martlesham and its differences with town centres. No specific allocations are made for new retail development reflecting particularly modest requirements for additional retail floorspace in the District and retail relationships with Ipswich Borough.

## D – Infrastructure

**Q29 – What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined? (124 responses)**

Many of the respondents to this question identified issues which relate to their individual communities. The general consensus is that the existing provision of infrastructure across the District is inadequate and unable to cope with any further development/growth. Common issues that have been identified include schools, medical facilities, broadband and mobile coverage, public transport, water supply and water sewerage.

Alongside the responses which called for improved public transport, respondents highlighted the inadequate provision of cycle lanes and facilities in the District which makes it difficult to link new and existing developments and provide sustainable alternatives to the private motor car.

Comments from service providers focussed on particular areas such as ensuring that all sites will require connections to the existing water supply and that development in certain parts of the District, such as Saxmundham will require a new primary school to be provided alongside any future

development. Issues were also raised in respect of access requirements at the Household Waste Recycling Facilities, libraries and fire sprinkler systems which may be provided alongside future developments.

A large number of responses highlighted the need for significant improvements to the road network in the form of the Ipswich Northern Route, Wet Dock Crossing and the four villages bypass on the A12. These large scale projects are considered by many to be essential to “opening” up the areas and improving the flow of traffic across the District. Responses which supported these type of developments were received from members of public, Town/Parish Councils as well as the development industry.

In a few instances, respondents highlighted that the infrastructure in their community (such as schools) were adequate but needed further growth to come forward to ensure the viability of these facilities.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan places great emphasis on the need for infrastructure as fundamental to the delivery of healthy communities across the District. The provision of infrastructure is acknowledged throughout and where a need has been identified site specific policies require the delivery of this infrastructure.

To highlight the importance of infrastructure as part of the First Draft Plan policies have been included which demonstrate the need for cross boundary infrastructure as well as a policy for the provision of infrastructure in Suffolk Coastal. An Infrastructure Delivery Framework has also been provided in the First Draft Plan to capture the infrastructure need across the District which has been informed by consultation responses and further engagement with service providers.

Throughout the plan period, the Council will continue to work with local communities, landowners, developers and infrastructure providers to ensure infrastructure is delivered in a timely manner across the District.

**Q30 – How can the strategic transport connections be enhanced and improved?** (44 responses)

In response to this question, some respondents identified various road junctions and “pinch points” in the existing network such as the Severn Hills roundabout, single carriageway sections of the A12 north of Ipswich and locations such as the Melton crossroads or traffic speeds on the B1116 in Hacheston.

A large number of respondents made specific reference to the provision of public transport services across the District which will provide viable alternatives to the private motor car. Improving the rail services through either dualling the lines or more regular services is seen as a positive step which will improve the sustainability of the area. Specific improvements to the passenger service at Saxmundham could include extending the branch line to also serve the communities of Leiston and Aldeburgh. Improvements to the rail lines would also help increase the capacity for freight movements associated with the Port of Felixstowe, however Network Rail has referenced that they are undertaking work to look at closing level crossings across the District which is likely to have an impact on associated communities.

The Local Plan should also consider ways of working with public transport service providers to ensure greater consistency and relationship between bus and rail services so that individuals can

make use of both services where appropriate, as opposed to the timetables being out of time with one another. Alongside this, the suggestion of subsidising fares to make public transport more cost effective was mooted.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses have highlighted the need to make further improvements to transport infrastructure over the plan period. The First Draft Plan identifies large scale development on key transport corridors and promotes links between road and rail provision.

Over the plan period, the Council will continue to engage with service providers to encourage greater capacity in strategic transport infrastructure which will bring positive opportunities to the District.

Where specific issues have been identified these have informed considerations and if relevant included within the First Draft Plan as policy requirements or within the Infrastructure Delivery Framework.

**Q31 – In which areas should "super surgeries" be considered? (37 responses)**

A limited number of responses to this question and all received from members of the public and Town/Parish Councils. These responses suggested that urban locations such as Ipswich, Kesgrave and Felixstowe were suitable as well as market towns and Key Service Centres. A fairly broad spread of suggestions across the District but generally these highlighted locations which are sustainable and accessible.

Some of the consultation responses highlighted that the location of medical facilities ought to be spread across the District in accessible locations. If facilities are not provided in accessible locations this may lead to rural and social isolation. Medical facilities can also provide further uses such as pharmacy, physiotherapy and other support and community provision which is of benefit to the wider community.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan does not identify any "super surgeries". Where consultation responses have highlighted a need for further medical provision, the First Draft Plan includes a policy requirement to this. Over the plan period, the Council will continue to work with service providers to ensure that appropriate medical facilities are brought forward (either through the Community Infrastructure Levy or provision by medical providers) in a timely manner.

**Q32 – Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where? (37 responses)**

The majority of responses to this question were provided by members of the public and Town/Parish Councils who have provided local information in respect of schools within their area.

Respondents identified capacity issues at Kesgrave and Farlingaye High Schools which needs to be addressed. Capacity at Felixstowe capacity will need to be considered alongside any further development that may come forward as part of the Local Plan Review.

A number of primary schools were identified as having capacity issues such as Trimley St Martin, Easton, Kesgrave, Kelsale and Saxmundham. It is also acknowledged by Saxmundham Town Council and the limited response from the development industry that any future growth in Saxmundham will need to provide a new primary school to address the capacity needs in this part of the District. Kelsale Parish Council also echoed this concern.

Most responses were focussed on primary and secondary school provision but some respondents highlighted that Leiston would benefit from sixth form provision and that each town should be able to provide education from nursery age to sixth form age. It was also acknowledged that nursery provision provides opportunity for parents to remain economically active and that the Local Plan should ensure appropriate early years provision is made.

Suffolk County Council included within their consultation response the pupil forecasts for all schools across the District so the capacity at each can be taken into account when considering future options and strategies.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes allocations which require the provision of a primary school as Felixstowe, Saxmundham and Trimley St Mary. Additional allocations at Eyke and Dennington also provide potential for increased car parking associated with schools as identified through the consultation responses.

Suffolk County Council have been involved with site allocations and identified the need for additional provision which can be delivered through the Local Plan.

**Q33 – What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments? (56 responses)**

Respondents to this question were in general agreement that there is a need for a variety of outdoor recreational spaces across the District. These recreational spaces provide opportunity for people in areas close to where they live as well as reducing the visitor pressure on the sensitive locations and sites across the District.

A range of spaces such as footpaths, informal spaces, sport and leisure facilities were highlighted as potential types of infrastructure that could be introduced alongside future development to serve the needs of the new communities as well as complementing the existing provision.

Comments from statutory consultees such as Suffolk Wildlife Trust and RSPB highlighted support for the introduction of the “Green Rim” around Ipswich, as this is seen to complement the mitigation being introduced through the RAMS (Recreational Avoidance and Mitigation Strategy) project as well as providing high quality spaces for the local communities to enjoy and contribute towards improved health and well being.

Throughout the responses it is noted that most highlight the need for outdoor recreational spaces to be provided alongside new development and most significantly this needs to be planned as an integral part of the design to ensure it is useable and effective. Respondents outlined that recreational spaces should be part of the development with ample green paths and cycle ways to access neighbouring areas/settlements and facilities as these provide local opportunities but also help preserve the more sensitive landscapes in the area.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan has been informed by consultation responses. A strategic policy on the provision of open space is included alongside site specific allocations which require provision of open space, recreational facilities and enhancements to open space. Where necessary the provision of green infrastructure has been included within site allocations as well as the Garden Neighbourhoods at Felixstowe and Saxmundham.

The provision of open space and recreational facilities will be monitored throughout the plan period and where relevant included within the Infrastructure Delivery Framework.

Issues in respect of Ipswich Borough such as the Ipswich Green Rim will be considered in the Local Plan produced by the Borough Council.

## Vision

### Q34 – What makes a successful community in Suffolk Coastal (51 responses)

A sustainable and balanced community is one that attracts and provides for all ages and a variety of backgrounds, with schools, shops, medical facilities, accessible meeting places, employment, open spaces and recreational facilities. Successful communities evolve over time through diversity and development which is successfully managed. A mix of generations and diverse facilities, supported by green infrastructure and attractive environments helps to make a community successful.

Across the District there is a need to maintain a variety of communities to provide choice of environment and location for residents. It is also important that residents have a stake in their community and environment. This can be achieved through good community spirit and engagement in community decisions and social opportunities.

Successful communities are a balance of social, economic and environmental factors and the historic environment often contributes to attractive and safe places to live and work. Suffolk Coastal has an abundance of heritage assets and historic places which helps to promote successful communities. Consultation responses also highlighted that the residents and businesses which operate and live within a community make the area successful. However it is acknowledged that all communities across the District are unique and “success” is measured in different ways in different settlements.

#### *How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a vision for the District up to 2036. This vision has been influenced by the consultation responses and recognises that communities across the District are unique and have a diverse attraction which is to be retained over the plan period.

Each community is successful in its own right and each can be measured in a variety of ways. At the heart of each community is the local population and the community facilities and services available to them. The First Draft Plan recognises the variety of communities across the District and includes a range of policies which can be applied to any area of the District. Policies to retain community facilities and services, as well as employment opportunities are included within the First Draft Plan to help maintain successful communities across the District.

### Q35 – What services/facilities/developments are needed to make a community successful? (47 responses)

Consultation responses identified that facilities such as cafes, shops, markets, play areas, public houses, village halls, footpaths and cycleways, places for social interaction and residential accommodation which meets the needs of all generations. Improving the capacity of services and facilities, alongside opportunities for informal (natural open space and areas for dog walking) and formal leisure activities is of great benefit to communities.

Numerous respondents highlighted that a good range of residential and employment opportunities are necessary for a successful community. It is also noted that some respondents acknowledged the neighbouring settlements provide infrastructure to maintain basic needs which in turn supports the facility in the nearby and (often larger settlement).

A need for reliable high speed broadband and enhanced digital infrastructure is required to support a successful community and enable residents to access facilities which are being provided on-line.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses identified a variety of services and facilities which are needed to make a community successful. The First Draft Plan includes policies which seek to protect these services and facilities to encourage the continued success of communities across the District.

The First Draft Plan also includes a policy in respect of digital infrastructure to support the continued upgrade of these facilities over the plan period. In some locations, the provision for digital infrastructure is poor and impacts on the quality of life of residents and visitors to the area. Consultation responses have highlighted the need to be proactive in addressing these issues.

### **Q36 – What is your vision for your local community? (60 responses)**

A positive vision for the local community is important and will help to develop a sense of community and provide additional services and facilities to support the existing residents. Supported by improvements to schooling, medical facilities and public transport including maintenance of the roads. Being able to access the existing range of services and facilities was a common response. Consultation responses highlighted the need for more affordable housing, as well as bungalows and properties targeted at elderly residents who wish to downsize and stay in their village. Improvements to digital and mobile services are also included within the responses to this question. These improvements will enable more residents to access facilities on line and improve their quality of life.

Some consultation responses received from Town/Parish Councils provided detailed visions for their communities which take into account the specific geographical and natural features of the community, relationship to neighbouring settlements. Each of these should share an ongoing sense of place, heritage and environment based on individual identity and character – which may include maintaining the physical separation between neighbouring communities.

Consultation responses highlighted the need to protect the countryside and natural environment of the District. The need to protect the environment is to be balanced against the needs of residents and businesses and the demands placed on facilities. The amount of second homes that are coming forward in the District needs to be carefully controlled and discouraged so that houses in the District are “lived in” rather than “occupied”. Future housing should be confined to that needed by permanent residents.

Communities undertaking Neighbourhood Plans outlined that visions for settlements are being evolved or have already been established through “made” Neighbourhood Plans.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes specific visions for settlements which are at the top of the settlement hierarchy. These visions are supported by area specific policies and site allocations which have been influenced by consultation responses.

Issues raised by consultation responses have been incorporated into site allocations and District wide planning policies. Residential allocations include policy requirements to target accommodation at the needs of the ageing population or younger people as opposed to properties which are

attractive to second home owners. Policies in respect of protection for community facilities and local shopping opportunities are included within the First Draft Plan along with the intention to resist settlement coalescence. Resisting settlement coalescence will also ensure that the identities of individual communities is maintained over the plan period as outlined by consultation responses.

The First Draft Plan also includes guidance on the relationship between the Local Plan and Neighbourhood Plans to inform future evolution and production of plans by local communities.

### **Q37 – How should the Council define housing requirement figures for Neighbourhood Plan groups? (42 responses)**

Defining the housing requirements for communities undertaking Neighbourhood Plans will be crucial and should take into account the sustainable location of the village. The number of units to be provided in Neighbourhood Plans should relate to the current size of the community and the opportunities afforded to it by the current distribution and strategy.

Where housing requirements are identified in the Local Plan, these should be informed by engagement with the local community and Neighbourhood Plan groups. These discussions can be informed by Housing Needs Assessments that are undertaken during the plan preparation periods.

Consultation responses highlighted that Neighbourhood Plans are regarded as expensive and time consuming and offer no real value. Placing a housing requirement would be seen as a burden for some small communities and the top down approach is inappropriate.

#### *How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes an indicative housing requirement for those communities who are already committed to undertaking a Neighbourhood Plan. These indicative figures are informed by the emerging spatial strategy and distribution of housing as well as potential opportunities for site allocations within these communities. The indicative numbers will be subject to public consultation and engagement as the plan evolves to the Final Draft Plan stage.

The Council is required to include indicative housing requirements for Neighbourhood Plans within its Local Plan.

## **Housing**

### **Q38 – Are the existing policy approaches and planning policies operating appropriately in relation to affordable housing? (74 responses)**

General consensus is that the existing policy approaches are not working and that the Local Plan should do more to ensure that more affordable units are provided and that developers do not “wriggle” out of the delivery of affordable housing on grounds of viability. Need to ensure that units proposed as affordable are actually delivered to meet the needs of the local population. Suggestion for the need to deliver Council houses to ensure that low cost units are provided which provide residential opportunities for those most at need in the District. Consultation responses suggested that developers should be encouraged to provide affordable units early in the development of a site.

Concern from some Parish Councils that the national changes to the threshold for affordable provision have changed and suggestion that the SCDC Local Plan Review needs to introduce a lower

locally set threshold. On the contrary some developers and the Home Builders Federation highlight the need to ensure that the affordable housing policy and threshold are revised to be in conformity with the national planning practice guidance.

Important to recognise that the local area is popular with tourists and second homes which takes residential units out of the housing stock. Need to balance the needs of the local population with the economic benefits of tourism. It would be inappropriate to direct affordable housing units to some areas of high house prices which are dominated by second homes such as coastal settlements.

Accessibility to services and facilities was highlighted as a factor in respect of affordable housing. Some consultation responses suggested that affordable housing delivery should be targeted to towns or areas with services and facilities to support those on lower incomes.

*How these comments have been taken into account in the First Draft Local Plan:*

Setting an ambitious housing target above the number arising through the new standard method approach will help to deliver more affordable homes.

Viability testing of Policy SCLP5.10 Affordable Housing on Residential Developments will be undertaken before the Local Plan is finalised, in order that the requirement contained in the final plan is considered viable. However, site specific circumstances may lead to a lower level of provision in individual circumstances.

The NPPF enables local authorities to set a lower threshold for affordable housing requirements and to obtain contributions from these developments in the form of commuted sums. Policy SCLP5.10 includes support for Neighbourhood Plans setting their own local policies for affordable housing provision where this is justified by evidence.

As they make up a significant proportion of the planned housing growth, the developments of Garden Neighbourhoods in the towns of Saxmundham and Felixstowe should provide significant amounts of new affordable housing, subject to viability testing.

**Q39 – Is the existing affordable housing policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a comprehensive approach to affordable housing? (64 responses)**

The majority of respondents indicated that the existing policies are not working appropriately and that the level of affordable housing being provided is not meeting the local needs. Future local plan policies need to be more proactive in encouraging developments to come forward which provide small residential units targeted at the young and the elderly. Policies should be flexible and recognise that different models can provide affordable housing which will increase opportunities. Modern construction techniques such as factory/modular build and the identification of self build can help to ensure that land is allocated for units which are truly affordable.

Numerous suggestions for the council to take the lead in the provision of affordable housing through developing Council houses or community land trusts which can ensure new units are affordable to the local community. The use of covenants to keep units small and restricting sale prices will help to maintain the number of affordable units in the District.

Concern raised that the affordable units built are not being taken up by people locally and often being made available to people outside of the District.

*How these comments have been taken into account in the First Draft Local Plan:*

Setting an ambitious housing target above the number arising through the new standard method approach will help to deliver more affordable homes.

Policy SCLP5.8 Housing Mix requires a mix of housing on sites reflecting the SHMA and also requires a proportion to be accessible and adaptable dwellings under Part M4(2) of the Building Regulations. Where there are specific opportunities for specific types of housing associated with proposed site allocations, such as housing to meet the needs of older people or self build plots this is specified within these policies.

The East Suffolk housing Strategy shows how the Council intends to support the delivery of more affordable houses through its other functions as well as planning. Policy SCLP5.11 Affordable Housing on Exception Sites requires an identified local need to be demonstrated.

**Q40 – Where provision for affordable housing on an 'exception site' is supported by, and can be shown to meet the needs of, that local community should planning policy be sufficiently flexible to allow for this? (55 responses)**

The majority of responses (from Town/Parish Councils) said yes to this question. Each highlighted that the needs of the local community need to be clearly identified and that future Planning Policies need to be flexible enough to accommodate this. A number of responses did not favour this approach as they consider that the development of an exception site may set an unwelcome precedent and therefore be detrimental to the future of the community.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.11 supports the provision of affordable housing in the countryside on Exception Sites where these meet an identified local need is included. The policy reflects the National planning Policy Framework.

**Q41 – Should we continue to allow market housing to enable the delivery of affordable housing where the financial viability of a development is challenging? (63 responses)**

Mixed response to this question. The majority of Parish Councils who commented on this question supported the need to allow market housing to ensure the delivery of affordable housing where viability is challenging. There is clear acknowledgement that market housing should be allowed to cross subsidise the provision of affordable housing but only where this is targeted at meeting the needs of the local community. Agents, developers and consultants highlighted the government's position which supports this cross subsidy.

Strong concern from members of the public that the Council should challenge the developers more on viability. General theme suggests that the council is not strong enough in respect of viability considerations and that planning policies need to be made more rigorous to ensure that it is much harder for viability arguments to be made by developers.

*How these comments have been taken into account in the First Draft Local Plan:*

Recognising the comments received, Policy SCLP5.11 would only support a proportion of market housing where it is demonstrated through a viability assessment that the market housing is needed for the affordable housing to be deliverable. The policy requires the market housing to be no more than one third of the dwellings.

**Q42 – Do you consider it appropriate for the Council to consider directing growth to a cluster of villages? (71 responses)**

A mixture of response to this question with many respondents saying that it would only be considered appropriate for the Council to direct growth to a cluster of villages if each village can maintain its identity and avoid coalescence of settlements.

It is noted that some of the “urban” communities have suggested that the Council should encourage this approach as it will help to spread the requirements across more areas, this view however is counter balanced by the “rural” communities who do not welcome the cluster approach.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP10.4 seeks to avoid the coalescence of settlements. The approach to site allocations has considered each settlement on its own merits rather than taking a clusters approach, however the methodology for the settlement hierarchy has considered whether a settlement is within 1km or within 1km-5km of a Major Centre or Market Town.

**Q43 – What criteria should be used to identify a cluster of villages? (36 responses)**

Strong objection to the principal of clusters as many respondents consider it necessary to ensure individual identity of each community is maintained and that settlement coalescence is not encouraged. Concern that clustering may lead to inappropriate levels of development being forced upon settlements that do not wish to grow and become larger.

There was acknowledgement from some respondents that clustering should be based on services which are accessible for the community and serve a variety of settlements and provide services such as medical facilities, schools, shops and other services that provide alternatives to the market towns or larger areas. Concern from some respondents that villages may be clustered around market towns which provide all the services and therefore of no benefit to the rural communities which need support for their facilities.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP10.4 seeks to avoid the coalescence of settlements. The approach to site allocations has considered each settlement on its own merits rather than taking a clusters approach, however the methodology for the settlement hierarchy has considered whether a settlement is within 1km or within 1km-5km of a Major Centre or Market Town.

**Q44 – How can the Council encourage the provision of fully serviced building plots for self build / custom build properties? (30 responses)**

The majority of responses from members of the public and the local community supported the provision of self/custom build plots across the District as part of development sites. Many of the responses outlined that parts of sites should be set aside for the provision of serviced plots to provide opportunity for self/custom build units to come forward. It was acknowledged that the landowner needs to see an appropriate return/income for the provision of such sites. However caution was raised in respect of self build properties being exempt from CIL charges and the concern that a large number of units delivered in this way will have a detrimental impact on the existing infrastructure.

Comments from the development industry have highlighted that the lack of identified plots is the biggest reason why self/custom build properties are not being delivered. It was also highlighted that it would be inappropriate to have a target for the number of self/custom builds as part of the wider housing target.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.9 requires developments of 100 or more dwellings to provide a minimum of 5% of plots for self build. However, the policy also provides for these to be developed by the developer if the plots are not taken up within 12 months. No overall target for self build plots is set.

**Q45 – Should these serviced plots be provided as part of a larger housing development? (37 responses)**

The proposal to include serviced plots as part of a larger housing development is welcomed by many of the respondents, with comments suggesting that this is becoming common practice on larger sites and a way of providing more affordable type units which provide alternative accommodation to the normal units delivered. Concern was raised from land promoters/developers that the provision of self build plots on larger development sites may only serve part of the demand across the District, as many self builders do not wish to take up sites within these type of developments.

It is interesting that rural Parishes have answered this question negatively and outline that it would not be appropriate, this may be down to the size of potential developments expected within the rural communities. The Local Plan Review needs to acknowledge that self build plots are only one part of the overall delivery across the District and although they can provide reasonable alternatives, these sites must be identified in appropriate locations which reflect the circumstances of any particular site.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.9 requires developments of 100 or more dwellings to provide a minimum of 5% of plots for self build. However, the policy also provides for these to be developed by the developer if the plots are not taken up within 12 months, which would respond to any issues around lack of demand.

**Q46 – Should we continue with the current policy approach to housing size or take a more flexible approach that reflects the site location and characteristics? (60 responses)**

General support for a more flexible policy approach to housing mix but with clear indication that any development needs to take account of the surrounding character, location and distinctiveness. Consultation responses from the local community have highlighted the need to provide different housing options for different sectors of the community such as young people, older people and those wishing to downsize. But these units still need to take account of the location and character of the site.

Responses from the development industry have highlighted that any policy needs to provide clarity for applicants. It has however also been suggested that the policy should introduce a threshold above which the council can be more prescriptive about the mix required. On smaller sites (under 10), the council should not implement the policy in respect of mix. Consultation responses also highlighted that there is often a mismatch between the needs identified in the SHMA and the actual demands of the housing market.

Suggestion that the current policy is working appropriately but responses encouraged the Council to ensure that the needs of the local community are listened to in accordance with guidance from the local Parish and Town Councils. Important to ensure that housing size is reflected by the level of amenities available in the area and developments provide inclusive communities for all.

*How these comments have been taken into account in the First Draft Local Plan:*

The Housing Mix policy (SCLP5.8) seeks to provide a greater mix of housing types, including more choice for older people. Policy SCLP5.8 does also provide an opportunity for mix to reflect locally identified needs where this is supported by evidence, such as where a Parish needs survey has been undertaken although it must be recognised that developments are contributing to the District wide need. Through the process of selecting preferred sites for allocation, consideration has been given to whether a site would offer particular opportunities to provide for a certain type of housing such as that which meets the needs of older people, and this is reflected in the site allocations policies.

**Q47 – How can the Local Plan promote an increase in smaller units to meet specific needs? (37 responses)**

General support from members of the public and Town/Parish Councils to identify sites for smaller units or propose sites for higher density developments. The delivery of smaller units is dependent on the specific needs of the local community and the need to provide accommodation for older people and younger people. Council encouraged to follow the result of the SHMA in respect of housing need and not be driven by the housing market. Local Plan policies should also encourage the delivery of flats and/or Almhouse type developments which will provide alternative choices of accommodation across the District.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.8 Housing Mix requires the provision of a range of types of housing, and the supporting text refers to a range of different types of housing including Almshouses. The policies for the housing site allocations include reference to specific types of housing that should be provided, such as that for older people, where appropriate to the characteristics and location of the site.

**Q48 – What more could be done to help ensure that more housing is provided specifically to meet the needs of older people, or those with specialist care needs? (42 responses)**

Clear indication from the consultation responses that the Local Plan needs to ensure that housing provision is appropriate for the ageing population which is growing rapidly. The increased provision of units targeted at certain parts of society (young, elderly, singles) will help ensure vibrant and inclusive communities. Encouraging more smaller units will enable downsizing opportunities which in turn will make more family style housing available.

A specific policy is required for the provision of specialist accommodation for older people which takes into account the variety of requirements from independent living to care provision. By properly planning for the housing needs of the ageing population it will ensure that land is used efficiently and that demands on the NHS and Social Services are reduced as residents will benefit from accommodation which meets their needs.

Acknowledgement from some consultation responses that the ageing population will make different choices and that not everybody wants to live in specialist accommodation but do want to remain in

their own homes. Important to provide a range and choice of accommodation across the District which may include retirement communities as seen in America as well as developments to cater for the needs of those with dementia or other conditions.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.8 includes support for sheltered and extra care housing where this will meet identified needs. The policy also requires a mix of housing to be provided and requires proposals to demonstrate how they contribute towards increasing the choice and mix of housing available for older people.

#### **Q49 – Should starter homes be part of the type and mix of units required? (49 responses)**

The majority of the responses clearly indicated that the Council should include starter homes as part of the overall mix expected on sites that come forward. Many Town and Parish Councils as well as members of the public highlighted their support for this proposal. Concern was raised by some agents though that the government’s definition of starter homes is still being clarified and the emerging Local Plan needs to be aware of this and incorporate any conclusions within future policies.

A small minority of the responses highlighted that starter homes were not needed are part of the overall mix because there are already sufficient units in the District. Some respondents also highlighted the need for “final” homes to balance the provision for “starter”.

*How these comments have been taken into account in the First Draft Local Plan:*

The proposed changes to the National Planning Policy Framework would bring Starter Homes within the definition of affordable housing and therefore they would be delivered through the affordable housing policies either on Exception Sites or as part of market housing development.

#### **Q50 – Should the Council encourage greater use of modular construction to provide a range of residential accommodation? (41 responses)**

The majority of the consultation responses supported the encouragement of modular construction techniques across the District, on the understanding that these are sympathetic to the setting of the existing buildings and community. Concern was raised from the development industry that the Local Plan is not the place to dictate the building methods, that is for the Building Regulation stage, but the Local Plan can introduce policies which encourage the delivery of modular properties, especially when these can provide suitable homes at a cheaper price.

*How these comments have been taken into account in the First Draft Local Plan:*

Modular construction is referred to in the supporting text to the self-build policy SCLP5.9 as one possible means of self building. It is not considered appropriate to specify modular construction, but it is recognised that this could contribute to housing mix.

#### **Q51 – Should specialist housing be delivered on specific sites or alongside other forms of residential development? (35 responses)**

The majority of the consultation responses acknowledged that providing specialist housing is an important part of the overall residential provision across the District. Many of the respondents

suggested that this type of accommodation should be delivered alongside and integrated with other forms of accommodation. The wider community benefits from the integration of residential units where these are well related to the neighbouring community and take account of the surrounding environment. A small number of responses indicated that it would be preferable to locate specialist housing on specific sites which are separate from the rest of the community.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.8 seeks to ensure a mix of housing on sites, and requires that proposals of 10 or more units will need to demonstrate how the proposal contributes to increasing choice and mix of housing available for the older population.

**Q52 – Are there any other specific types of residential use that need to be planned for? (26 responses)**

Consultation responses highlighted a need for Planning Policies to provide for a wide range of accommodation across the District. Examples include mobile homes, bungalows, accommodation for an ageing population and retirement communities.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP5.8 Housing Mix requires a mix of housing types to be provided and requires that proposals of 10 or more units will need to demonstrate how the proposal contributes to increasing choice and mix of housing available for the older population. The approach to site allocations has included identifying specific opportunities for housing that would help to meet the needs of older people as part of site allocation policies.

**Q53 – The District contains a small number of houseboats. Existing planning policies limit the areas within which houseboats are permitted and the number of houseboats within those areas. Do you think this type of approach remains appropriate? (31 responses)**

General support for the provision of houseboats as these provide alternative forms of residential accommodation as well as being attractive part of the rivers and surrounding landscape. Consultation responses supported the existing policies but suggested that these need to be amended with positive enforcement from the Planning Department. Policy on houseboats should be expanded to include a local definition in respect of a functioning house boat which can move from site to site and floating homes which are not capable of moving.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 5.15 relates to houseboats and is accompanied by mapped areas of existing houseboats. These areas were identified in discussion with the Deben Estuary Partnership, through site visits and through analysis of maps. Under this policy additional and replacement houseboats will be permitted in these areas.

The First Draft Local Plan also provides a local definition of a houseboat which describes a floating decked structure without a permanent foundation which is designed or adapted for use as a residence and not primarily used for navigation. This does allow for houseboats that are navigable, to an extent.

**Q54 – Should the physical limits boundaries be tightly defined around existing built development or more loosely defined to allow for small scale development in communities? (113 responses)**

The majority of responses highlighted the need to retain the settlement boundary as these provide a clearly defined boundary which provides some certainty for the local community. Many respondents from local residents and or Town/Parish Councils supported the intention to retain these boundaries and that they should be tightly drawn, defined and defended. Consultation responses acknowledged the role that settlement boundaries play in defending the countryside and other such locations which may be subject to speculative applications – they also serve as a way of ensuring settlement coalescence is resisted.

Very limited support for the introduction of a criteria based policy because this will lead to less certainty for the local community and make things looser which will lead to infringements in some cases.

Some comments from the development industry sought the requirements that boundaries should be drawn loosely as this will provide greater opportunity to encourage small scale development within the defined boundary. Suggestions also that the Council should consider introducing a criteria based approach which sets out the conditions that allow for extensions to the boundaries.

The consultation responses highlighted a strong difference of opinion between the development industry and the local communities in respect of physical limit boundaries across the District.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP3.4 retains settlement boundaries, and the boundaries themselves have been updated to reflect planning permissions for residential use granted up to 31.3.18. This approach to retaining settlement boundaries should be considered alongside the policies for the countryside including Policy SCLP5.4 Housing in Clusters under which proposals for up to three dwellings would be supported in clusters of five or more dwellings, and proposals for up to five dwellings in clusters of up to ten dwellings, providing opportunities for small scale growth outside of settlement boundaries.

**Q55 – Can criteria based policies more appropriately deal with growth in the rural areas than physical limits boundaries? (81 responses)**

The majority of the respondents to the question were from members of the public who indicated that the introduction of a criteria based policy is not appropriate when dealing with levels of growth. Concern from many members of the public that implementing a criteria based policy would lead to “open season” in respect of developments which would not be acceptable.

It is acknowledged in the consultation responses that a criteria based policy would be difficult to interpret and enforce when compared to a physical limits boundary which should be enforced consistently and regularly.

Opposite views were generally received from the development industry or agents acting on behalf of potential sites. Comments supported the loosening of the boundaries to allow for more flexibility and growth inside the boundary. In some locations it has been suggested that increasing the amount of land within the boundary would be a more proportionate way of ensuring growth can come forward in appropriate locations.

*How these comments have been taken into account in the First Draft Local Plan:*

As with the response to Q54 above, policy SCLP3.4 retains settlement boundaries, and the boundaries themselves have been updated to reflect planning permissions for residential use granted up to 31.3.18. This approach to retaining settlement boundaries should be considered alongside the policies for the countryside including Policy SCLP5.4 Housing in Clusters under which proposals for up to three dwellings would be supported in clusters of five or more dwellings, and proposals for up to five dwellings in clusters of up to ten dwellings, providing opportunities for small scale growth outside of settlement boundaries.

**Q56 – Do all settlements require physical limits boundaries? (75 responses)**

The majority of consultation responses highlighted the need for settlements to have a physical limits boundary, although in many instances this was justified by commentary relating to the clarity that a boundary provides and that a boundary would stop communities blending into one another. Within the support for the boundaries, it is noted that some respondents said that boundaries are only needed for sustainable locations where growth is expected and it would be inappropriate for all settlements to have a boundary reinstated.

Comments were mainly from the Town/Parish Councils or members of the public, but on occasions the development industry provided comments which suggested that not all settlements are sustainable and therefore question the need to introduce physical limit boundaries in the most sustainable settlements.

A limited number of responses gave a simple answer of no to this question but in the main there was generally a positive response to this question and the need to provide physical limit boundaries in sustainable locations.

*How these comments have been taken into account in the First Draft Local Plan:*

Settlement boundaries are applied or retained to all Major Centres, Market Towns, Large Villages and Small Villages. Settlements in the countryside do not have settlement boundaries as the countryside policies would apply. It is not considered to appropriate to not apply settlement boundaries as the boundaries provide a degree of certainty for communities.

**Q57 – Do you think the current policy approach to development in housing clusters is working successfully or does it need to be amended? (33 responses)**

The general nature of the responses was one of support from many Town and Parish Councils who consider that the cluster policy is generally working appropriately across the District. Some communities highlight that a cluster should be no more than 5 units, where as others indicated that it should be over 5 units so there was a mixture of opinions as to what constitutes a cluster.

Comments from members of the public highlighted the need to ensure that a cluster is more clearly defined but that the current approach is appropriate to deliver additional housing whilst avoiding coalescence and environmental impact.

Limited comments from the development industry/agents but these tended to highlight the need for the cluster policy to be more flexible or expanded to reflect the local conditions and the dependency within the rural areas on the private motor car.

*How these comments have been taken into account in the First Draft Local Plan:*

Reflecting the strategy for the Local Plan to facilitate growth in the rural areas, Policy SCLP5.4 Housing in Clusters in the Countryside provides greater scope for development than is contained in the current policy DM4 in the Core Strategy and Development Management Policies (2013). The definition of a cluster is set out in the policy and is described in the supporting text.

**Q58 – How should the Council consider applications for the re-use of redundant buildings in the countryside?** (49 responses)

A mixed response to this question but comments generally favoured the re-use of existing buildings but with flexible policies to ensure that these can be renovated for a mixture of residential and employment uses. Responses acknowledged that the re-use of redundant buildings can provide a blend of sustainable development in rural locations but recognised that this re-use needs to be done in a manner which is sympathetic to the surrounding area. A common theme throughout the responses was that the any re-use needs to reflect the original use of the building and recognise the historical merit to preserve the heritage of the District.

Comments from most Town and Parish Councils suggested that the current policies are working well and should be retained and implemented on a case by case basis. In circumstances where a group of buildings can be reused, these should be considered collectively and not in a piecemeal manner to ensure that the most positive outcome is achieved.

Organisations such as the Suffolk Preservation Society and the Suffolk Coast and Heaths AONB unit have highlighted that the location of the site and the surrounding area needs to be carefully considered to ensure that developments in sensitive locations are not detrimental to the landscape and townscape.

The responses from the development industry highlighted that the current policies are not flexible enough and do not take account of recent changes in the permitted development orders. The Local Plan Review provides the opportunity to align policies with the government guidance on permitted development.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy on the conversion and reuse of rural buildings for employment uses (including tourism). The economic and tourism related policies provide guidance on how the Council will consider change of use applications. These policies seek to respect the historic interest of the buildings and setting within the countryside as an important requirement of the policy.

The First Draft Plan takes a positive and proactive approach to the conversion and re-use of redundant buildings in the countryside in accordance with national policy and the Permitted Development Rights. Residential uses are also supported but only in exceptional circumstances and where appropriate to their setting.

**Q59 – Should the Council introduce a sequential approach to the re-use of redundant buildings with priority given to, for example employment or tourism use?** (32 responses)

A mixed response to this question, but in general there was support for the sequential approach to alternative uses. The majority of responses which supported this approach came from the local community as well as Town/Parish Councils. The responses generally favoured employment uses as

the preference, followed by tourism and then residential use but encouragement for this to be undertaken on a case by case basis which is sensitive to the surrounding landscape.

Alternative comments were received from the development industry who agreed that the current approach is outdated and not appropriate. It should reflect changes to the government's permitted development rights and ensure that residential uses can be brought forward without having to undertake a sequential approach.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan promotes the re-use of redundant buildings primarily for economic, tourism, cultural uses. Policies see to ensure that non residential uses are considered and explored first and brought forward before residential uses are considered. The First Draft Plan includes reference to the Marketing Guidance which the Council commissioned in 2016 to support proposals for re-use of buildings.

The First Draft Plan takes into account the consultation responses and where appropriate includes requirements generated through the consultation. Impact on landscape and local highway networks were common issues raised through the consultation and these have been identified within the emerging policies which provide greater flexibility than the current Local Plan policies.

## Business and Industry

### **Q60 – Should we continue to identify both strategic and general employment areas? (37 responses)**

Majority response : Yes.

Sensible in order to recognise the differing nature and scale of employment floorspace. Reflect the distinctive infrastructure and land use context of particular sites. Uncertainty as to the nature, attributes and key considerations that could be involved in making a planning decision for development or change.

A broad diversity of local businesses and employment cited as a reason for and against such a differentiated approach. Polarised responses regarding land allocation provision for growth in the transport sector - eg: *“simply not accessible to a large enough market”* versus *“well placed to benefit from the expansion of the transport and logistics sector, owing to the location close to key ports and the associated trunk road network”*. *“Retail should not displace employment”* versus *“A Local Service Centre with a business centre but no retail facilities, may benefit from allowing a shop on the site which employees and residents can use rather than driving to the nearest shops”*.

Bespoke policies that recognise and support particular main drivers of jobs and economic growth. Make provision including a choice of sites to create the right environment in which the Port of Felixstowe and a locally strong and growing digital technology sector can meet their aspirations. Identify Sizewell 'A' as a General Employment Area to help secure its retention as an employment site in the future.

Provide flexibility and choice for commercial and employment development markets. New sites are needed under both categories. General employment areas which are not suitable for heavy industries should be identified. The east of Ipswich is well placed to support delivery of mixed use urban extensions that build on the existing cluster of employment sites in the area.

General employment areas provide focus points for businesses in dispersed rural areas. General employment areas for Debach and Bentwaters airfields should allow uses beyond B use classes.

Consider alternative employment sites to avoid environmental and social impacts on Kirton and the Trimleys.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses were in favour of retaining the distinction between Strategic and General Employment Areas. Despite this the First Draft Plan seeks to combine these allocations into one policy. In practice the policy in respect of Strategic and General was implemented in the same way and proposals judged on site specific criteria and operations as opposed to whether the operation was strategic or general in nature.

The First Draft Plan proposes a policy which supports employment generating uses over the plan period and details appropriate uses unless neighbouring uses restrict operations.

Having one policy will provide greater flexibility of uses and operations that come forward over the plan period, as opposed to introducing a restriction which relates to Strategic and General areas.

**Q61 – Should we continue to stipulate the uses on sites allocated for employment or should policies be more flexible to allow a wider variety of uses? (44 responses)**

Some comments in favour of stipulating but more in favour of flexibility. Eg: “Avoid piecemeal development” versus “don’t stifle innovation”. A pilot site might help understanding to develop the working principles of a more flexible approach to use of sites.

Some flexibility of use classes to support the growth of new and existing business and enterprise, especially as the nature of work evolves and new industries emerge. Flexibility to support those sui generis or hybrid uses that may not necessarily fall neatly within a B use class. Reflect economic development as B Use Classes, public and community uses and main town centre uses (but excluding housing development). If employment uses don't emerge other uses should be considered. Focus flexibility on brownfield sites to encourage their reuse.

Stipulate close to housing for community awareness of potential uses. Specify certain types of uses or building heights and massing to incorporate employment development within historic environments. If multiple uses are proposed, these should be considered for their historic environment impacts before they are included within policy. Aldeburgh needs to retain its employment sites as the town has lost sites over recent years.

Mixed use sites - Housing directly associated with business and retail should be considered as was often the tradition with shops and rural services. Should the Sizewell 'A' Site be proposed for allocation for employment use (and other uses) within the reviewed Local Plan, it would be considered beneficial to acknowledge the sorts of uses that would be supported at the site.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan provides site specific details in respect of employment sites that have been identified. Many of the sites are already existing employment areas and therefore have established uses on them. Policies within the First Draft Plan seek to maintain these existing uses and provide direction as to the type of uses which may be appropriate should the site be subject to redevelopment. As encouraged by consultation responses, the policy for Employment Areas identifies that ancillary uses (including cultural and tourism uses) will be supported on sites bringing forward employment uses.

New employment sites are identified with policy requirements to restrict future uses to those required by various sectors of the economy.

**Q62 - Should planning policies take a flexible approach to new employment development where there is an identified need by allowing development outside of allocated sites and physical limits boundaries? (49 responses)**

Consider the nature and suitability of existing sites and premises.

Flexible approaches to new employment development outside of allocated sites and physical limits boundaries could lead to undesirable development over and above that supported by the operational requirements of a site.

Policy support for smaller scale employment development outside of allocated sites and physical limits boundaries should be established.

Ensure suitable policy support for local, small scale enterprise and innovation that can provide a valuable source of employment for the local population. It is suggested that a local need rather than size threshold would be an appropriate control mechanism to ensure schemes that come forward warrant additional support and flexibility as to location.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses identified a need for a flexible approach to employment uses which need to grow beyond their existing sites. The First Draft Plan includes policies which guide the expansion and intensification of sites which provide economic activity. The First Draft Plan also includes a policy on economic development in rural areas as this will help support small scale enterprises which are a valuable source of local employment.

**Q63 – Should the Local Plan allocate more land than is required for employment uses or should we only allocate what is needed? (51 responses)**

The Local Planning Authority should make every effort to accurately forecast likely demands and allocate sites accordingly, but where there is any uncertainty suitable additional sites should be proposed for allocation. 'Over provision' for this purpose is a far more sound basis from which to move forward in a Plan than the alternative. The 'science' of calculating need is not 100% precise in any event and there are any number of variables over which planning has no control.

The release of too much land might result in pressure being put on the Council to release it for other purposes but policies that are effectively prepared and justified by appropriate research will prevent that risk.

To allocate more land than is required may create planning blight, amount to land banking and provide an incentive not to progress development on brownfield sites and other sites where planning permission.

This would not be matched by the enthusiasm of investors to supply the capital to deliver these desires. So relate policy for serviced employment sites to investment in the delivery of serviced employment land.

Existing approaches are over providing for B8 uses when considering economic evidence growth forecasts.

Broadband development will create employment opportunities away from Ipswich.

An Ipswich Northern Bypass, with its related improvements to the existing (A12) road infrastructure, will provide considerable opportunity to release an area of land that provides for a quality business and/or non-port related distribution park near the A12/A14 junction east of Ipswich.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses highlighted caution in respect of over allocating land for employment uses. The Council acknowledges this caution and therefore only seeks to identify new employment areas which meet the needs of specific sectors in locations where demand is clearly demonstrated through the evidence base.

The First Draft Plan identifies land for Port related uses at Innocence Farm and land for Business and Professional Services Sector at Felixstowe Road. Both of these sites provide over and above the baseline land requirement in the evidence base but are targeted at specific sectors and will only come forward should the demand be maintained and deliverability demonstrated at the time of application

#### **Q64 – What land is required to support main economic sectors across the District? (32 responses)**

Allocate land with good infrastructure links for business purposes and to reduce the use of land away from main infrastructure for uses that require inappropriate traffic movements.

Whilst other strategic sites may have clearly defined boundaries this is not necessarily the case with port-related activity. Demand for logistics sector sites and premises is much stronger in Felixstowe and along the A14 corridor in Suffolk Coastal than it is in Stowmarket. This is an important consideration for the development of Local Plans across the relevant areas and an aspect that requires further investigation.

Control Port and ICT industrial clusters spreading to new areas of the countryside.

Port land available at London Gateway could threaten current levels of business as well as future growth potential of Felixstowe Port.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses have highlighted the need to identify land to support the main economic drivers across the District. Supported by evidence undertaken specifically in the Port of Felixstowe Growth and Development Needs Study, the First Draft Plan seeks to allocate land at Innocence Farm

for port related, haulage, logistics operations. The evidence base aligns with consultation responses in that demand is strongest in close proximity to the Port of Felixstowe.

Land allocations at Innocence Farm and Felixstowe Road (for Business and Professional Services Sectors) will help to support the main economic drivers across the District.

**Q65 – In which locations or specific economic sectors would a co-locating policy be appropriate?** (14 responses)

Suggestions include firm and tourism sectors.

The need for such a policy approach is less that it was since working from home via high speed broadband can fit well with a business model.

Polarised responses on the need for co-location policy for the transport and distribution sector, eg: *“any container park should be close to the operations”* versus *“Inappropriate for warehousing on the basis that it will be largely automated, run by remote working and its siting should avoid environmentally sensitive areas”*.

Substantial potential land at Ransomes and Martlesham presents co-location opportunities.

This is already occurring naturally enough so council policy is not needed.

*How these comments have been taken into account in the First Draft Local Plan:*

Limited consultation responses to this question highlight that there is a need for such a policy, but also that this is already occurring across the District. The employment policies in the First Draft Plan enable the flexibility to promote the co-location of businesses and sectors should opportunities arise over the plan period. New land allocations will also be positive in enabling sectors to co-locate and support one another.

**Q66 – Should the Council continue to identify rural employment sites?** (31 responses)

Majority response : Yes.

These are just as important as any other employment site, helping employers to identify and have a clear understanding where the Council will support employment initiatives.

Many redundant agricultural sites should be considered for employment conversion. Promote a planning policy which is sensitively reactive to previously unforeseen windfall situations.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses identify the importance of rural employment sites. The First Draft Plan acknowledges the contribution these make to economic development across the District and carries forward sites allocated for employment purposes in the rural areas.

The First Draft Plan also includes a policy to encourage economic development in rural locations and takes into account the permitted development rights associated with buildings and activities in these areas.

**Q67 – What criteria should be used to define a rural employment site? (28 responses)**

Rural and commercially viable. Access onto a major road network with no pinch points. Rural employment sites tend to add significantly to the traffic and small country roads are unsuitable.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan carries forward sites allocated for employment purposes in the rural areas, as well as providing policies which support and encourage economic development on sites in rural areas.

## Town Centres, Retail and Commercial Leisure

**Q68 – Are the existing boundaries of town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages still appropriate? (24 responses)**

Consultation response feedback generally considered the existing boundaries appropriate. Have measured/modest growth through time to allow town centres to grow unless physical limits prescribe. Town centres and primary shopping areas must have boundaries in order that they don't spread to take up parkland and countryside. The boundaries should remain since they closely map out the existing reality and need not be expanded because of internet shopping. Tight residential areas adjacent to town centre restrict opportunity to alter town centre and shopping area boundaries.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses and updated retail and town centre evidence is that the existing boundaries of town centres, primary shopping areas and primary and secondary shopping frontages are generally appropriate subject to minor adjustments. The exception is Woodbridge town centre that inherited older saved Local Plan policies and required the delineation of boundaries for primary shopping areas and frontage policies subsequently introduced prior to this First Draft Local Plan.

**Q69 – What areas or locations should be considered for inclusion or exclusion from these boundaries? (13 responses)**

Included should be shops, cafes, post offices, libraries, car parks and those facilities which support social interaction and cohesions. Areas that are a long way from the centre like car parks, toilets and public transport could be excluded. Office accommodation or other facilities which would reduce and deny footfall should be excluded.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes town centre boundaries that support social interaction and cohesions that are contiguous with the uses associated with the policy. Excluded are areas that are predominantly residential or are not characterised by concentrated footfall, main town centre uses

or are detached or further away from such concentrations.

**Q70 – Should the Council introduce a local impact assessment threshold to help demonstrate no impact on existing town centres in an objective way? (29 responses)**

(National policy requires proposals for retail and commercial leisure development of more than 2,500sqm to undertake an impact assessment on town centres.)

Consultation response feedback generally favoured locally set thresholds reflecting distinct town centres. There is a need to set a lower impact threshold across the District. As large supermarkets and retail stores with sizeable market shares are so established it may be unnecessary to set a local impact threshold lower than 2,500sqm, as this may make no difference to local trading patterns. Include the impacts on District centres such as The Square, Martlesham Heath.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses highlighted a need to set local thresholds to consider retail impact of proposals that come forward. The First Draft Plan includes a set of thresholds specific to individual town centres and is consistent with up to date retail evidence that has been prepared to support the Local Plan. The lower thresholds reflect the distinct town centres across Suffolk Coastal.

**Q71 – Should the Local Plan continue to protect retail provision within District and local centres? (38 responses)**

Generally responses considered it appropriate for policy to continue to protect retail provision within District and local centres. This is important to the vibrancy and the social environment of communities. There are components of retail provision like discount food stores that are absent from Woodbridge and some other market towns. Businesses need to innovate in order to keep up with change. Diversification and flexibility to respond to consumer demands will be needed to ensure shops remain occupied. A more balanced mix of housing and retail provision may be more appropriate to help restore the community balance. For example, accommodation over or associated with a retail outlet.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy that supports retail including small supermarkets but also commercial leisure and community facilities where they contribute to the retail and service function of the centre in relation to communities they serve.

**Q72 – What uses are appropriate within District and local centres? (20 responses)**

Direct professional service (A2) uses to local / District centre and edge of centre locations because this diverse service and employment sector is growing whilst traditional banking services provided on the high street are contracting. Provision needs to be made for discount food stores. Towns need to not just provide the daily basics, but encourage visiting, such as having ample parking, and be pleasant to walk around.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan defines District and Local centre boundaries to include shops, local facilities and servicing areas that function together in a complementary and cohesive way. Shops,

professional services, cafes, post offices and libraries are included.

**Q73 – What areas or locations should be considered for inclusion or exclusion from a District or local centre? (18 responses)**

Sufficient facilities should be provided to serve the local community. Included should be shops, cafes, post offices, libraries and car parks to support them. Office accommodation or other facilities which would reduce and deny footfall should be excluded. Rushmere and the area near Tesco at Felixstowe Road, Martlesham, which includes the Community Hall and Parish rooms should be excluded from becoming a District centre.

*How these comments have been taken into account in the First Draft Local Plan:*

Servicing areas including car parks, public transport facilities, toilets and public spaces contiguous with the cohesive nature of a District or local centre are included. Where they are detached or more distant they are excluded from boundaries on the Policies maps.

**Q74 – Are there particular opportunities in relation to commercial leisure across the District? (21 responses)**

Vacant units at retail parks may be unsuitable for change of use to leisure. The choice context for leisure like swimming or a sporting activity may affect people without a car more in locations with a lack of daytime and evening public transport. Planning policy should have a light touch when applied to commercial leisure activities. Town centres should be developed in accordance with their own local character with a strong sense of place and as destinations in their own right. Flexible approaches could help local town centres be opportunistic in responding to meet the demands of the people living in them, to social and economic trends, signals and encouraging evolving interactions between land uses.

*How these comments have been taken into account in the First Draft Local Plan:*

Rather than evidence of specific commercial leisure opportunities in the District, the first draft local plan incorporates flexibility reflecting evidence of the small scale, tourism aspect and changing context to retail, cultural and leisure opportunities across the District.

**Q75 – Do the existing Local Plan and Neighbourhood Plan policy boundaries assist opportunities for accessible new leisure provision? (22 responses)**

Local Plan and Neighbourhood Plan policy boundaries assist opportunities for new leisure provision. Thorpeness and other coastal / tourist centres have the potential to support commercial leisure even though they are not town centres. Encourage the visiting of town, District and local centres, such as through ample parking, and environments which are pleasant to walk around.

*How these comments have been taken into account in the First Draft Local Plan:*

Feedback and evidence was that the existing Local Plan and Neighbourhood Plan policy boundaries assist opportunities for accessible new leisure provision. So only minor changes are made to existing policy boundaries to include facilities which support social interaction and cohesion. The exception is Woodbridge town centre that inherited older saved Local Plan policies and required the delineation of boundaries for policies subsequently introduced prior to this First Draft Local Plan.

**Q76 – What is a successful mix of retail and commercial leisure uses across the District? (16 responses)**

The Local Plan should have flexibility to respond to consumer demands in District and local centres to support sustainable retail as this will support and create stronger communities. Town centres should be the first choice for new shops and leisure uses. A choice of commercial leisure venues is required in order to suit different age ranges and cater for diverse preferences. People should not have to routinely leave town to get their entertainment. More public seating and gathering places for entertainments of various kinds are needed. Town centres in Suffolk Coastal are suited to fashion, beauty, art, boutiques, cookery, independent retailers with specialist expertise and products. Encouraging the retail offer of market towns is important to tourism and sustainability.

*How these comments have been taken into account in the First Draft Local Plan:*

Rather than set a categorical framework for a particular perception of a successful mix of retail and leisure across the District, the First Draft Plan incorporates flexibility reflecting evidence of the small scale, tourism aspect and changing context to retail, cultural and leisure opportunities across the District.

**Q77 – Where is the best place for new retail development to meet the needs of areas east of Ipswich? (26 responses)**

Felixstowe as it has a large population and excellent transport links. Martlesham should not be expanded further, it is at peak capacity for retail and is affecting the retail offer of Woodbridge. Rather than develop east of Ipswich, Ipswich itself should be regenerated as a shopping centre. It may be unrealistic to accommodate bulky goods retail in town centres due to distance between shops and car parking. Separation of retail showroom, storage and collection premises presents opportunity for bulky goods customer collection in accessible community hub locations in town and out of town.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy approaches in the First Draft Plan recognise differences and geographical relationships between Suffolk Coastal Town centres, Martlesham retail park and Town centre and out of centre retail in Ipswich Borough. Differences and shopping relationships include emphasis on different types of retail such as bulky goods or niche shops. No specific allocations are made for new retail development reflecting joint retail evidence for Suffolk Coastal and Ipswich Borough and support for regeneration of the County Town's centre.

**Q78 – Does out of town retail at Martlesham affect your town centre or local area? If so how? (33 responses)**

Town centres already have, and will continue to develop a diverse offer which does not directly compete with retail parks such as Martlesham. Out of town shopping can undermine local smaller scale enterprises but there are significant distances between Martlesham and some Suffolk Coastal market towns. Embrace the established function of Martlesham and plan positively in accordance with the NPPF by making site allocations for new retail provision. Differences between out of town retail parks and town centres require policy to be very careful not to be detrimental to either of them. Need policy approaches for distinct established retail destinations, both town centre and out of town.

*How these comments have been taken into account in the First Draft Local Plan:*

Retail and town centre policies reflect distinct town centres and include a dedicated policy for Martlesham and Kesgrave that embraces the established out of centre retail function of Martlesham and differences between out of town retail parks and town centres.

**Q79 – Are the existing policy approaches and planning policies operating appropriately in relation to retail? (22 responses)**

As new developments come along, it may be beneficial to provide new District centres which link well with the new housing provision. Promote small scale provision to meet retail growth close to large housing and employment sites. Continue to protect retail provision within District and local centres. Conversion of retail (or other business use) to residential should be resisted in town centres. It is important that qualitative factors are addressed across Suffolk Coastal in terms of improving choice and accessibility to new forms of retail provision. Smaller market towns and their communities would benefit from qualitative improvements.

*How these comments have been taken into account in the First Draft Local Plan:*

Policies for strategic housing and employment growth in North Felixstowe and Saxmundham promote small scale provision to meet retail growth close to large housing and employment sites. Policy approaches for town centres have a particular focus on accessibility to, from and around town centres.

**Q80 – Is the existing town centre and leisure policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a more comprehensive approach? (18 responses)**

Some comments that existing policies are sufficient in spite of and because shopping behaviour has significantly changed. Proactive environmental, traffic flow and accessibility improvements could help market towns, especially Saxmundham and Leiston. There is a lack of local employment opportunities in market towns, and what there is should be preserved where at all possible. In the north of Suffolk Coastal, local town centres need convenient and cheap / free parking so they can prosper in the context of retail development pressure being sucked south to the 'East of Ipswich' area. Neighbourhood Plans can support individual projects to promote the regeneration of Town Centre and Railway station areas. There is potential for nearby Parishes to work together to reflect clustering opportunities for car parks and park and ride solutions serving multiple centres.

*How these comments have been taken into account in the First Draft Local Plan:*

Accessibility and appealing town centre environments are a focus of Draft Local Plan policies. In respect of employment opportunities in market towns, this is recognised as a broader than town centre matter for market towns in the Business and Industry policies and site allocations in Saxmundham. In respect of car parking, transport policies include parking proposals and standards. The coverage and style of the First Draft Local Plan is intended to support Neighbourhood Plans for particular town and Parish communities to address and shape individual projects that promote the regeneration of Town Centre areas.

## Tourism

### Q81 - What specific types of tourism accommodation are required across the District and in which locations? (37 responses)

#### Summary of Key Issues:

Need to appreciate a move to internet based tourist accommodation sites such as Airbnb.

The types of tourist accommodation suggested can be seen below, there has been a particular focus on camping and caravan sites, and B&Bs. Key tourist locations have been presented as the best locations for further tourist accommodation, popular places being Aldeburgh, Thorpeness, and other coastal locations in general. Overall there has been a clear response for a dynamic policy towards encouraging varied tourist accommodation to appeal to a range of tourists, while also being aware of the impact this has on the existing housing stock, and on the natural environment.

Perhaps tourist accommodation that is differentiated from the housing stock would be a move in the right direction, including for example camping and caravan sites, B&Bs, and pubs. With regard to camping and caravan sites, it is acknowledged that they are not acceptable in FZ3 and must pass the exception test to be acceptable in FZ2, due to their lack of adequate flood mitigation measures.

Types of Tourist accommodation: self catering studio units (4), low cost individual and group accommodation, all types (2), B&B (5), holiday lodges (2), wide ranging and fairly priced tourist accommodation (1), camping and caravan sites (8), pubs (2), guest houses (2), high standard hostels (1), encourage unique and quirky offerings (1), AirBnB (1).

Tourist locations: (Aldeburgh (3), Wickham Market (1), Thorpeness (2), Felixstowe (1), coastal locations (5), near to key tourist locations.

#### *How these comments have been taken into account in the First Draft Local Plan:*

As detailed through consultation responses the type of tourism accommodation can be varied. The First Draft Plan includes a policy which relates to all tourism accommodation as this will give greater flexibility to the ever changing demands of the market and tourism sector over the plan period. Suffolk Coastal has a distinct and successful tourism sector and the Local Plan has a key role to play in supporting this. The First Draft Plan also includes a tourism policy which places greater requirements on sites within the Area of Outstanding Natural Beauty.

### Q82 – Should tourist accommodation be encouraged across the whole District or just in specific areas? (28 responses)

#### Summary of Key Issues:

Whole District (14)      Specific Areas (7)      Both (1)

Overall, there is more support for the distribution of tourist accommodation to be District wide, than across specific areas. However, there are also comments suggesting tourist accommodation should be focused on specific tourism hotspots in order to benefit from existing facilities. Also important is

the ability to identify the ways specific areas offer different tourist attractions and this should be reflected in the types of tourist accommodation available.

Importantly, it is emphasised that tourist accommodation should be encouraged but not at the expense of residential accommodation (in creating empty settlements in off peak tourist seasons). Creative ways of utilising tourist accommodation should be explored so as to reduce the depletion of the housing stock (in transferring to tourist accommodation). In addition, 'exceptional circumstances' should be placed on any types of development taking place within the AONB.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses have highlighted that tourism accommodation can take many forms in a variety of locations across the District. The First Draft Plan seeks to encourage tourism accommodation across the District to support the tourism sector.

Policy requirements are introduced to resist the conversion of tourism accommodation to residential uses through limitations on occupancy.

### **Q83 – Do we need to protect existing tourist accommodation from conversion and redevelopment to other uses? (24 responses)**

#### **Summary of Key Issues:**

Mixed response on the whole. There is a belief made by some comments that there is too much tourist accommodation in the District, and that it is underutilised. Hence, an increase in tourist accommodation may lead to further under occupation of properties and villages, leading to the unviability of local shops. As well as the impact that under occupation of the housing stock has on affordability.

However, there are other comments that express a need for further tourist accommodation in order to benefit from the attractive Suffolk Coast, in terms of supporting local businesses, and enhance the area as a tourist destination. Comments relate this issue to that of second homes and the negative consequences of under occupation of the housing stock for large times of the year. Where a justification for a sustainable change in use can be made this should not be prevented.

Policy could state that tourist accommodation should be protected in areas that lack available tourist accommodation. However, in areas where tourist occupation is under occupied and there is plentiful tourist accommodation perhaps it should not be protected from redevelopment into other uses.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan promotes tourism accommodation across the District. Where proposals to redevelop or convert this accommodation to alternative use such as permanent residential use the applicant will be required to demonstrate the lack of need and demand for the accommodation. Marketing guidance is included within the policy which seeks to protect existing tourist accommodation.

Consultation responses highlighted that accommodation should be protected to enable the tourism sector to flourish and remain vibrant and the First Draft Plan includes positive policies to ensure this occurs over the plan period, in accordance with landowner aspirations, market demands and the

East Suffolk Tourism Strategy.
--------------------------------

**Q84 – What is the most effective way of ensuring that tourism accommodation is not occupied for full time residential use? (27 responses)**

**Summary of Key Issues:**

Comments suggest a zoned policy that prevents change of use in certain areas and that is effectively monitored and enforced by the council would go some way to prevent tourism accommodation being occupied on a full time basis.

Other suggestions include applying conditions to planning permission that prevent occupation over a period of time to be decided upon, 10 months has been suggested.

The policy and conditions that apply to the tourist accommodation should be displayed at the property so as to make it as clear as possible to the occupier.

A further suggestion of ways to prevent full time occupancy of tourist accommodation is to introduce a 'tourist tax' as seen in some European countries.

A couple of comments have questioned the need to stop people occupying properties on a full time basis, with the supporting argument that it aids the vitality and viability of the local economy and community. However, our argument would be that with specific regard to tourist accommodation (for which there is significant demand) there should be adequate supply for the visitors to the District, full time occupancy of these properties prevents this.

In addition, there has been concern that the housing stock in certain areas should be protected from a change of use to tourism accommodation. This is particularly the case in Dunwich, as the permanent community of the village has been dwindling as a result of second home owners.

<i>How these comments have been taken into account in the First Draft Local Plan:</i>
---

The First Draft Plan includes policy requirements which restrict the use of tourism accommodation in terms of occupancy. Planning conditions will restrict use and landowners will be required to maintain a register of all lettings to enable planning enforcement to take place successfully.
--

**Q85 – How can planning policy better facilitate the development of tourism attractions to support the resort of Felixstowe? (16 responses)**

**Summary of Key Issues:**

Acknowledgement of the varying tourist uses in different areas of Felixstowe is needed in order to plan for the success of the tourist scene in Felixstowe, suggestion has been made that policy should define the different tourist uses in the different areas. Whether this would be too prescriptive for businesses needs to be considered?

By advertising the unique tourist facilities investment opportunities may arise that incentivise prospective business and leisure providers to implement attractions. Comments have also made regard to the beach huts as an important characteristic of the beach front. In supporting the tourist offer in the town more information should be widely spread across the areas that are likely to enjoy

the tourism offers in Felixstowe and across the different tourism attractions (bars, hotels, restaurants, shops, libraries), in the form of for example leaflets, posters, pamphlets.

The proposed leisure sites to the North of Felixstowe are supported by Trinity College, as it would provide considerable leisure opportunities for the residents of Felixstowe and the Trimleys.

Support has been given to the provision of adequate car parking, and improvements to the punctuality and reliability of the train line between Felixstowe and Ipswich.

Creating a townscape that includes the natural environment is suggested would add to the appeal of the town in attracting tourists, in the form of planting trees and flowers along the sea front and possibly the creation of a sea front park with children play areas and cafes (possibly linking the seafront to the high street through the use of green pathways).

The pier is a significant attraction to Felixstowe and should be provided for as such. Suggestion has been made to the importance of the pier as a focal point of the whole seafront.

There has been concern raised over the effect that increased port related functions and commercial traffic will have on the tourist industry in Felixstowe. Policy should be aware of this issue.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan maintains the tourism related policies established in the Felixstowe Peninsula Area Action Plan. Where appropriate these have been revised to reflect consultation responses and opportunities that have arisen in response to the consultation. Collectively, they encourage a proactive and positive approach to tourism in the resort of Felixstowe and reflect the consultation responses in respect of attractions on the seafront such as the Pier and the Spa Pavilion.

Additional policies relating to tourism across the District and tourism attractions is also included within the First Draft Plan and these will further support the Felixstowe resort.

**Q86 – What type of resort activities will help extend the tourism season and increase visitor spend?** (24 responses)

**Summary of Key Issues:**

As seen below there is a large and diverse range of activities suggested, which will differ in suitability across the different tourist hotspots. The activities that have been popular amongst the responses are festivals (books, food, music, theatre), walking, and sporting events. More important perhaps, is the decision to promote a diverse array of tourist activities that will be appropriate in different areas of the District. Felixstowe has been suggested should focus more towards the 16-25 age group. Across other parts of the District perhaps a more family focussed approach maybe more suitable.

Particular mention has been made to the potential of the seafront gardens in Felixstowe to become a destination for small festivals, concerts, and exhibitions. Making the most of the seafront gardens is a good way of utilising our existing assets for the benefit of the whole community. Furthermore, different types of events in this location, and other locations like it such as existing town halls and leisure centre halls, will help to extend the tourism season.

There is support for the seafront and in particular the pier as a focal point in attracting tourists from across the many different activities along the seafront.

Tourist provision away from the coast and sensitive AONB may help alleviate pressure on the existing tourist hotspots.

Martlesham and Kesgrave seem to be under way in collaborating to provide, or incentive the provision of, a museum that aims to emulate and promote the areas historic connections to the flying with RAF Martlesham Heath being key in this regard. This idea of promoting historic connections in the form of a museum is an option for other areas of the District also.

There is potential for greater use of the estuaries and rivers throughout the District; fishing and water sports could be further advertised to attract greater interest in the use of the waterways throughout the District.

Fundamental to the improvements in the tourist industry is the advertisement of the different offers across the District. People must know about what's on offer in order to benefit from it. This needs to be both an online and offline resource that is widely accessible.

Activities suggested: commercial leisure, walking (4), cycling (2), wildlife, winter events, skating rink, market stalls, Christmas fare, large and small festivals (5)(books, music, theatre, food), indoor activities in the winter months (2), more use of the rivers, sporting events (2), outdoor sports, cultural activities (2), animal watching, museum (2) (to promote areas connections with history), science, jazz festivals, poetry, literature, use of existing leisure hall for (exhibitions, lectures, and courses), concerts in seafront gardens, nature/outdoor activities, arts, heritage offer, golf, fishing.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses have highlighted a wide variety of tourism attractions and opportunities across the District. Previous Local Plans included specific policies relating to various locations, but the First Draft Plan proposes an alternative view based on consultation responses. The First Draft Plan includes a policy on tourism attractions which will apply across the District and provide policy direction to all attractions.

Specific policies which carry forward the resort policies from the Felixstowe Peninsula Area Action Plan have been included within the First Draft Plan and provide specific area based policies that complement the policy on tourism attractions.

New attractions are also supported in the First Draft Plan as over the plan period they are expected to come forward as opportunities arise and market demand dictates.

**Q87 – Do we need a different approach to tourism development in the AONB as opposed to areas outside the AONB? (50 responses)**

**Summary of Key Issues:**

There have been no respondents that support the same approach to tourism across the whole District. There is strong support for a different approach in the AONB to the areas outside the AONB. There has also been unanimous support for applying great weight to conserving and enhancing the AONB. However, there have been differing responses as to how to deal specifically with tourism within the AONB. Comments have ranged from complete forbiddance for any development within the AONB, to acknowledgement that sites within the AONB are key tourist areas and so rather than

handicap tourism in these locations a more managed and progressive approach that makes reference to the sensitivities of the important natural environment.

In addition, responses suggest a criteria-based approach to sites should be introduced rather than a blanket wide approach across the entire AONB, as within the AONB there are areas that are more or less sensitive to development. The internationally and nationally significant sites within the AONB should be given greater protection than lesser sites.

Furthermore, perhaps there should be a focus on tourist attractions, within the AONB, that have less of a direct impact on the landscape. Walking, cycling, and bird watching for example would act as natural activities on the landscape. Perhaps more adventurous activities should be kept to certain defined locations.

Consideration must be given to the negative aspects that an increase in tourism activity in an area will have on the sensitive AONB.

It has been noted that where tourism development would enhance the long term sustainability of the area, it should be encouraged, subject to careful consideration.

Furthermore, it is suggested that there is capacity for tourism development to be carried out outside the AONB. Whether this is desirable is uncertain. It would certainly reduce the pressure on the AONB. However, some of the key tourist locations in the District are in the AONB. Hence reducing tourism in these locations would be detrimental to local businesses and local people. The areas adjacent to the AONB should be protected from development to ensure that the context and setting of the AONB is not negatively impacted by tourism and development.

It is suggested that exceptional circumstances should be required to justify major development within the AONB.

Tourism in the AONB should aim to encourage the appreciation of the importance of the AONB and ways to protect it.

While tourism development in the AONB is a major consideration, it has been suggested that where development is considered appropriate the design of the proposed schemes must be considered as of considerable importance.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan reflects the consultation responses in that it details a different approach to tourism development inside and outside of the AONB. These approaches can be seen in Policy SCLP6.3: Tourism in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Heritage Coast and Policy SCLP6.4: Tourism outside the AONB.

## Vehicle Parking

**Q88 – Are the current SCC parking standards appropriate in the context of Suffolk Coastal? If not, what changes would you wish to see and why? (37 responses)**

**Summary of Key Issues:** A lot of respondents appeared to be unaware or uncertain of what the SCC parking standards contained, therefore, they could not specifically address the question. Notwithstanding this, a number of respondents recommended the imposition of more favourable parking rates to attract tourists and rural residents into the towns. Free car parking was mooted by some as a possible solution. Respondents also emphasised the need to recognise that it is a rural District and the car is the dominant form of transport. Respondents also suggested better provision of off-road parking including undergrounding and parking spaces for electric cars.

Ensuring that car parking is provided in new builds and not lost in conversions of existing properties was also highlighted as an issue. Another problem that was highlighted was the fact that the parking standards are not flexible regarding change of use.

Some respondents agreed that the current SCC parking standards are appropriate in the context of Suffolk Coastal. However, it was highlighted that greater enforcement of the standards is required. One respondent rejected the need for allocated parking in town centres due to the likelihood of a reduction in car ownership and the development of smart technologies such as 'ride-hailing'. Another respondent emphasised that the standards are flexible regarding parking provision and are therefore relevant to both rural and urban areas. However, this is re-buffed by a number of other respondents. The promotion of bicycle use as an alternative to car parking was also mentioned by various respondents.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a policy for vehicle parking (Policy SCLP 7.2). This policy details the need for off-street parking, vehicle charging points and ancillary infrastructure for proposals involving vehicle parking. Proposals are also expected to meet the SCC parking standards where they do not relate to design. The supporting text of Policy SCLP 7.2 clearly recognises the car as the dominant form of transport across the District. This is also supported by relevant stats and figures.

Policy SLP 7.2 includes provision for secure storage and parking of bicycles. Cycle links are also included as part of policies for site allocations, where possible.

Car parking prices cannot be addressed by planning policy, but will be included in relevant parking management strategies. Parking enforcement will be addressed through Civil Parking Enforcement (CPE).

**Q89 – Is the need for and the importance of, vehicle parking sufficiently reflected in existing planning policies? (40 responses)**

**Summary of Key Issues:** The majority of respondents did not feel that the need and importance of vehicle parking is sufficiently reflected in existing planning policies. Numerous respondents highlighted the fact that current car ownership rates are not accurately reflected in the parking standards or policy. A large amount of respondents indicated a need to consider EV charging infrastructure and visitor parking in planning policies. Park & ride facilities were also highlighted as potential considerations for planning policy. Many respondents also felt that parking allocations need to be flexible in line with new development coming forward which increases parking requirements. One respondent refers to the fact that planning policy fails to address the impact of parking emanating from new housing developments on market towns. Also, some respondents felt that car parking should be considered as part of the infrastructural needs.

On the contrary, one respondent highlighted the fact that technological advancements could lead to less of a need for the car and more of a need for better public transport provision. Therefore, the Council should be focussing on prioritising public transport, cycling and walking as modes of transport. Notwithstanding this, some respondents stated that it would be naïve to think that residents will cycle to and from town/work.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a policy for vehicle parking (Policy SCLP 7.2). The current Local Plan does not include a dedicated policy for vehicle parking. Policy SCLP 7.2 details the need for vehicle charging points and ancillary infrastructure for proposals involving vehicle parking. The provision of park & ride facilities is also encouraged by this policy. Parking provision relevant to the location, type and use of a proposal is generally encouraged by this policy.

Stats and figures from the latest census demonstrate that the car is the dominant form of transport across the District. This, coupled with the limited public transport network and wide dispersal of settlements across the District does not facilitate the prioritisation of public transport, cycling and walking as modes of transport.

Policy SCLP 10.2 deals specifically with visitor parking at European Sites.

## Community Facilities

**Q90 – Should we continue to protect all existing community services and facilities?** (45 responses)

### Summary of Key Issues:

- The vast majority of comments agree with the question, all existing community services and facilities should be protected.
- Suggestion has been made that some community facilities that are more popular/ have greater support from local people/ of greater use/ if they weren't protected there would be severe undersupply of the facility/ economically viable should be protected to a greater extent than lesser facilities.
- Others have suggested some facilities should be protected while others shouldn't have any protection.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy in respect of community facilities and assets across the District. The policy reflects the consultation responses which identified the importance of these facilities and services. Community services and facilities vary across the District and therefore the emerging policy includes a wide definition of assets to ensure flexibility across the District.

The First Draft Plan also makes reference to the marketing of these facilities should they be subject to change of use applications. This requirement will also ensure that further opportunity to retain the community facility or community asset is taken over the plan period.

### Q91 – Should some types of services and facilities be given more protection than others? (26 responses)

#### Summary of Key Issues:

- The majority of comments agree that some types of services and facilities should be given more protection than others. However, there are many differing suggestions of the facilities that deserve greater protection.
- Some of the more popular suggestions include schools, medical/health facilities, local shops, green spaces, historic sites (including churches).
- There have also been a few comments suggesting all facilities should be of equal value.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses highlighted the variety of services and facilities across the District. Some have statutory protection such as schools and playing fields but others do not. The First Draft Plan therefore takes comprehensive approach to community services and facilities to ensure that all are protected.

It is acknowledged that some services and facilities are private enterprises outside of the remit of the local authority or the local community. However, the First Draft Plan removes this differential and provides policy requirement to retain and protect all services and facilities regardless of origin or operation.

In instances where services or facilities are to be replaced, the First Draft Plan includes a policy requirement for these to be of an equivalent or better facility than the existing provision.

### Q92 – Where it is not possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment? (37 responses)

#### Summary of Key Issues:

##### Yes:

- Understanding the value of each community facility/service when deciding what would be an appropriate re-use of an existing facility is very important.
- Suggestions have made it clear that there is strong support for investigating all potential options before redevelopment can occur, and involving the local community when deciding on potential facilities.
- Financial viability should not be the only measure as to whether a facility is successful or not.
- Where community facilities are lacking in rural areas, it should be acknowledged that this puts greater importance on community facilities within the market towns and large villages (gives them a greater catchment area).
- Suggestion has been made that adequate time must be allocated before the site can be redeveloped, in order to allow time for a different community facility to gain funding.

##### No:

- One comment suggests it should always be possible to retain the existing community facility.
- One comment suggests SCDC should not be required to preserve community facilities if they are not wanted or needed by the community. In which case redevelopment should not be prevented.

*How these comments have been taken into account in the First Draft Local Plan:*

Within the policy seeking to retain community facilities and assets, the First Draft Plan includes a policy requirement for alternative uses and extensive marketing to be undertaken before redevelopment comes forward.

Consultation responses which highlighted that it is not always possible are acknowledged. The First Draft Plan recognises that it may not always be possible but in order to promote healthy and vibrant communities the First Draft Plan seeks to retain these in the first instance with an alternative.

**Q93 – Which areas lack appropriate provision of community facilities? (33 responses)****Summary of Key Issues:**

- Rural areas lack adequate facilities, emphasises the need for facilities in the market towns and larger villages.
- Comments suggest new housing developments should also provide community facilities.
- Type of facilities recommended (churches, doctor, dentist, schools (2), village hall (3), local shops, leisure facilities, public transport (3), play space, allotments, care homes,
- Areas in need of facilities (Trimley St Martin, Kirton and Falkenham, Wickham Market, Saxmundham,
- Ufford, Chillesford, and Aldringham state they do not warrant the local service centre label applied to them.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan acknowledges the variety of provision across the District, but seeks to take a District wide view to provision. Where of a scale large enough, site allocations identify the need for further provision of services and facilities to be determined through further engagement with service providers and the local community.

Where communities have identified a shortfall, these have been discussed with service providers and where appropriate have been included within the Infrastructure Delivery Framework.

**Q94 – Should the council continue to use CIL or Section 106 agreements or a mixture of both? (32 responses)****Summary of Key Issues:**

- A number of comments suggest there will be different scenarios in which to use CIL, section 106 or a combination of both and so they should all be utilised in order to gain the most value from development.
- Suggestion has been made of the importance in making sure the funding that is acquired in a Parish is spent in a Parish.
- Important that where there is significant need for facility there should be strong pressure on the developer to supply the facility rather than funding for the facility.
- There have been a small number of comments that have suggested CIL or Section 106 should be used exclusively.

However, these comments lack a justification for these decisions

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan outlines a variety of policy requirements to ensure the delivery of services and facilities as part of future developments. These requirements will help to influence the further considerations and evidence to be commissioned in respect of a revised CIL Charging Schedule.

The Council will continue with the current CIL charges until further evidence is prepared and examined alongside the emerging Local Plan.

**Q95 – Should specific sites be allocated for community facilities? (27 responses)****Summary of Key Issues:**

- The vast majority of comments welcome the prospect of allocated sites for community facilities.
- 2 comments state there is no need for allocated sites for community facilities, and also suggest they should not be used unless there is reasonable prospect of them coming forward for such use.
- Comments suggest community facilities should be utilised on mixed use sites where possible.
- Parish Council agreement should be gained when allocating sites. Further to this Neighbourhood Plans have been suggested as a good way of allocating sites for community facilities. These will hopefully be more specific to local people and local needs.
- Allocation of sites should be conducted only where there is evidenced need for a particular community facility.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes specific site allocations which require the provision of community facilities and services. These are all to be delivered alongside future residential and mixed use developments and contribute to wide variety of existing services and facilities.

**Q96 – Should future Local Plan policies provide greater protection for facilities identified as Assets of Community Value? (38 responses)****Summary of Key Issues:**

- This question has received almost unanimous support. Many of the comments suggest where an ACV has been established this designation should be given greater protection than community facilities that are not ACVs, specifically by Local Plan policies.
- Comments have suggested SCDC should provide more advice to local people and Parish Councils regarding how best to deal with ACVs and finance their protection.
- Emphasis has been placed on the protection of ACVs through Neighbourhood Plans.
- Suggestion has been made that a moratorium of 5 years should be added to ACVs, preventing the asset from being sold or disposed of without first being offered to the local Parish Council. Suggesting the current 6 month period is insufficient.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses highlight support for those services and facilities identified as Assets of Community Value and the First Draft Plan acknowledges this support as part of the text justifying the

policy. The Local Plan is flexible enough to accommodate any further changes and requirements that evolve throughout the plan period.

## Healthy Communities

### **Q97 – How can the Local Plan assist the enhancing and re-development of modern leisure centres and sports hubs facilities across the District? (26 responses)**

There is a clear steer from the consultation responses that the local plan needs to assist in enhancing leisure provision across the District. Existing evidence base documents such as the Sports Facilities Strategy and the SCDC Leisure Strategy should be used to identify areas of deficit across the District. Consultation responses highlight that enhancing the provision of facilities at existing locations would be a positive way of ensuring re-development and modernisation of facilities take places.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses outlined that future development can assist in enhancing leisure provision across the District. Areas of deficiency identified in the evidence base have been included within the Infrastructure Delivery Framework and where appropriate in relation to area specific policies and visions in the First Draft Plan.

### **Q98 – What policies are needed to ensure that appropriate leisure provision is provided across the District? (25 responses)**

A limited number of comments on this question, but it is clear that any policy approach needs to be supported by appropriate evidence which can also include Health and Wellbeing strategy for Suffolk. By ensuring that policies are supported by evidence, it ensures that the most appropriate provision is brought forward in suitable locations. Consultation comments highlight a need for a variety of facilities across the District – some indoor facilities such as swimming pools, but supported by other improvements to footpaths, areas of open space and informal recreation as these collectively contribute to good health and wellbeing.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses to this question have informed the vision for the District and the desire to increase leisure provision and promote healthy vibrant communities. The First Draft Plan includes site specific policies which where appropriate detail specific requirements in relation to leisure provision and connections to existing Public Rights of Way Networks, areas of green space and the countryside.

Opportunities for substantial leisure provision will be supported in principal under the spatial strategy and vision for areas which seeks to promote the facilities required to meet the needs of the local community. The provision of a Garden Neighbourhood in North Felixstowe includes specific reference to leisure provision and open space as part of a comprehensive master plan development.

### **Q99 – Is the provision of a new modern leisure facility for Felixstowe, enabled through the redevelopment of the existing facilities for other uses, better than seeking to refurbish the existing ageing leisure facilities? (22 responses)**

In general, the intention to provide a new modern leisure facility for Felixstowe is supported provided any new facility is in an accessible location and is state of the art, thus providing significant improvements on that currently found at existing centres. Consultation responses questioned the need for relocation and highlighted that the existing site(s) should be retained and refurbished in their current location as they currently provide successful facilities.

Concern from members of the public in respect of the costs associated with this type of redevelopment – many respondents considered that they would need further detail before being able to provide appropriate comments on this issue.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes provision for a leisure centre as part of the policy related to the Garden Neighbourhood in North Felixstowe. The provision of the purpose built modern leisure centre is expected to be provided alongside future development in this area. Consultation responses highlighted concerns about the costs associated with a new leisure centre and were concerned about it being delivered without a proactive approach to the existing leisure centres. The First Draft Plan includes policies which ensure that the existing centres are not closed and redeveloped prior to the opening of any new leisure centre.

**Q100 – Should we continue with the existing standards, or should the provision of new open space and play space be guided by the deficiencies identified in the Leisure Strategy. (36 responses)**

Comments from statutory organisations such as National Trust, Suffolk Wildlife Trust and Sport England highlighted the need for policy standards to be based on robust evidence and guided by any deficiencies identified in evidence base documents. A number of communities considered that the level of open space within their area is adequate at present, but that these areas need to be protected as they support the overall health and wellbeing of the local community.

A number of respondents have highlighted the need for new country parks and areas of open space to be identified in the Local Plan Review. Areas such as these ensure that residents have the opportunity to use wild areas for walking and cycling which is in keeping with the Suffolk landscape, but it is important to appreciate the difference between natural areas of countryside and those areas which are used as playing fields or more formal provision.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy on open space which supports the increased provision across the District. The policy is supported by the Suffolk Coastal Leisure Strategy and assessments which underpin this strategy as well. The national standard of 2.4ha per 1,000 people is also included within the supporting text and will be used by the Council over the plan period.

Site specific policies and visions for areas identify opportunities to provide open space and recreational facilities, linkages into the existing Public Rights of Way Networks and opportunities for walking and cycling where appropriate as outlined in the consultation responses.

**Q101 – What type of facilities/provision should be considered as Open Space? (37 responses)**

Consultation responses outlined a wide variety of facilities which may be included within the definition of open space. The definition should include both formal and informal provision such as

sports pitches and woodlands but should also include land which can be viewed but not readily accessible to the local population. It is noticeable that respondents have highlighted the need to be flexible in approach and definition but should include any existing sites and those facilities easily accessible to the local community.

Sites can accommodate the needs of different elements of society but collectively meet the overall needs of the community. However where sites and provision has become redundant these should no longer be considered as useable open space. Caution was raised to indicate that if the definition is too wide then it might give the impression that there is sufficient provision which clearly is not the case.

Organisations such as Sport England identify a variety of facilities which could be classified as open space, with Historic England highlighting the importance of green infrastructure in enhancing and conserving the historic environment.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy which supports the provision of open space and recreational facilities. The policy seeks to promote active and healthy lifestyles and encourage participation by all sectors of the community.

The First Draft Plan does not distinguish between formal and informal open spaces but includes a presumption in favour of retaining all varieties of open space.

#### **Q102 – Under what circumstances may it be acceptable to allow the loss of open space to development? (50 responses)**

The majority of responses to this question identified that there should be none or very exceptional circumstances where it is acceptable to allow the loss of open space. Comments from members of the public were very clear that there are no circumstances where the loss of open space should be allowed. Many Town/Parish Councils shared this view but some did indicate that it may be acceptable, but only where a new/improved replacement facility can be provided in a suitable location.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy which guards against the loss of open space or community sport and recreation facilities. Policy requirements are provided to detail the exceptional circumstances where the loss of open space would be allowed.

In exceptional circumstances where the loss is allowed, the First Draft Plan seeks to ensure that an equivalent or better provision in terms of quantity, quality and location is more accessible to the community is to be brought forward.

#### **Q103 – What type or size of development should provide new on-site Open Space? (34 responses)**

It is clear that all respondents to this question consider it necessary to provide open space on-site, however there has been a variety of opinions in respect of the size of development that should provide this. Many respondents were unsure how to answer this question or submitted no comments. However, some indicated that the threshold should be as low as four units, some suggested six. The majority of respondents (both members of the public and Town/Parish Councils)

highlighted a number of over 10 units would be appropriate. Some also suggested developments of over 20 units should be required to provide on site open space.

Some respondents have not provided a figure for the size of development, but outlined that developments need to be considered within the context of existing provision in the settlements and any other developments proposed. The size of the open space should be proportional to the size and scale of the development proposed and in accordance with best practice guidance, published by Natural England.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a variety of site allocations and where appropriate requirements for open space have been included guided by the SCDC Leisure Strategy and the assessments which underpin that evidence base.

Consultation responses highlighted the need for developments to provide open space and the First Draft Plan acknowledges these comments on both small and large sites across the District.

**Q104 – Which areas of the District experience deficiencies in health facilities?** (43 responses)

Many of the respondents provided anecdotal evidence in respect of their local areas. Clear concern from members of the public about access to medical facilities including doctors and dentist as well as the distances and time taken for ambulance services to reach patients.

Respondents noted that communities in the north of the District rely heavily on the medical facilities located in market towns, but many of these are already over stretched due to the level of housing growth that has taken place in recent years.

There is a clear acknowledgement from the majority of respondents that there are not enough doctors and medical professionals to serve the existing facilities which places greater pressure on the services. Many respondents have also acknowledged that when living in rural areas, residents accept that access to medical facilities is limited and more challenging than compared to communities in the rural areas.

It is noted however, that no comments have been received from medical providers. Each of the responses have only been received from members of the public and town/Parish Councils.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes medical provision within the definition of a community facility and seeks to promote appropriate facilities across the District. Policies for Garden Neighbourhoods at Felixstowe and Saxmundham include requirements for provision of medical facilities. This definition is broad and could include services such as doctors, dentists, physiotherapists or other provision to meet the needs of the community and the service providers over the plan period.

**Q105 – How can the Local Plan Review further promote the provision of high speed broadband and communication networks across the District?** (32 responses)

All respondents acknowledged that good quality broadband (and other communications technologies) are needed across the District. Clear concerns about the poor services currently seen in the rural parts of the District. Many respondents outline that developers should be challenged/expected to provide fibre broadband connections to all new developments, but there is a

clear understanding that the existing network may not allow this – due to the limitations of copper wires.

Respondents noted that the provision of good quality broadband provides many benefits to the communities and can encourage economic activity in the rural areas through increased working at home and business opportunities.

It is noted that many responses have highlighted the poor signal received in respect of mobile phones, radio and tv services in parts of the District. Consultation responses have indicated that the Local Plan Review should take steps to ensure improvements to all communications networks. It is however acknowledged that improvements to communication networks may only be driven by market forces and demand, which may be difficult to achieve in parts of the District.

*How these comments have been taken into account in the First Draft Local Plan:*

The consultation responses highlighted a clear need for the Local Plan to take a proactive and positive approach to the provision of digital infrastructure across the District. The First Draft Plan acknowledges the variety of services across the District and includes a policy on Digital Infrastructure which has been informed by service providers. The policy places requirements on new developments to provide appropriate digital infrastructure.

The policy within the First Draft Plan is considered to be flexible to adapt over the plan period to the ever changing requirements of the service providers and demands of customers.

**Q106 – How can the Local Plan Review create safe and accessible communities which do not undermine the quality of life across the District? (33 responses)**

Respondents to this question have highlighted the importance of ensuring safety for communities. It is suggested that a police presence is a key factor in the creation of safe and accessible communities. Numerous comments highlight the importance of involving the police and other authorities in the design stages of future developments to ensure issues such as access, lighting and parking courts are planned safely from the start.

A number of responses suggested that housing and employment growth should be concentrated in the urban areas and where there is an adequate police presence in the District. Preservation of the existing character and facilities is important as well as ensuring that communities grow slowly and that the Local Plan avoids rapid increases in population as a result of new developments.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses were clear that a fundamental part of the delivery of a successful community is the reduction in crime and the removal of the fear of crime. By creating safe and accessible places, the Local Plan can help maintain the quality of life for residents across the District.

The First Draft Plan includes reference to the creation of safe and accessible communities through ensuring that the design and layout of developments adheres to good planning principles and that the fear of crime is reduced for all. The Council will continue to work with the Suffolk Constabulary and other service providers to create successful communities across the District.

## Climate Change

### Q107 – Should we continue with the CCMA existing policy approach? (24 responses)

**Summary of Key Issues:** The majority of respondents supported sustaining the existing CCMA policy approach. However, it was repeatedly stated that new evidence and information, particularly in relation to flooding and climate change, must also be taken into account as part of an adaptable policy approach. The Shoreline Management Plan was highlighted as an important document in this respect.

One respondent pointed out that the CCMA should not be applied where a hold the line policy is in place which is supported by national planning policy.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a policy for Coastal Change Management Areas (SCLP 9.3). This policy generally sustains the same policy approach implemented in the Site Allocations and Area Specific Policies document. A level of flexibility is included in the policy to allow for consideration of emerging evidence that comes about during the lifespan of the Local Plan.

### Q108 – What types of development should be considered appropriate within a CCMA? (24 responses)

**Summary of Key Issues:** There was a general consistency in the responses to this question, in that, no development or temporary development at the developer's own risk would be supported. Suggestions included – caravan parks, leisure facilities, agricultural facilities, housing extensions, modular buildings and flood protected development to promote wildlife tourism. Permanent structures were generally not supported unless they were fully defended from erosion at the developer's risk.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 9.3 states that only temporary development directly related to the coast will be permitted in the Coastal Change Management Area where there is an identified risk of coastal change occurring within a 20 year time horizon. In parts of the Coastal Change Management Area where there is an identified risk of coastal change occurring beyond a 20 year time horizon, commercial and community uses will be permitted provided they require a coastal location and provide economic and social benefits to the local community. This is consistent with both national policy and the consultation comments.

### Q109 – Should the CCMA boundaries also be redrawn to reflect the topography and infrastructure? (19 responses)

**Summary of Key Issues:** Most respondents, bar two, supported the redrawing of CCMA boundaries to reflect topography and infrastructure. One respondent claimed that the SMP takes into account topography and infrastructure. Another respondent suggested that topography and infrastructure

should not take precedence over evidence of anticipated coastal change when drawing the CCMA boundary.

Separately, one respondent identified a particular area in Bawdsey where the CCMA boundary needs to be redrawn.

*How these comments have been taken into account in the First Draft Local Plan:*

There is a commitment in the Coastal Change Management section of the First Draft Local Plan to delineate the Coastal Change Management Areas based on existing infrastructure and topography. This will be undertaken when a review of the Shoreline Management Plan occurs, which will also involve expanding Coastal Change Management Area boundaries to the estuaries.

**Q110 – If required, should the Council proactively allocate land for the relocation of property at risk from erosion?** (27 responses)

**Summary of Key Issues:** There was quite a mixed reaction from respondents to this question. Those who did not support proactively allocating land for relocation inferred that if you decide to live on an eroding coast, you should bare the cost. Those who supported this approach were both unanimous and hesitant in their support. For example, it was stated that a condition of this approach should be that the owner of the property was not aware of the coastal erosion risk before they purchased the property. Some respondents suggested that relocation could be addressed on a case-by-case basis or that the local community should be consulted on other options before any allocations are made. Another respondent suggested that there should be agreed parameters before any site is proposed for allocation for relocation. One respondent referred to government climate change and adaptation documents that should be supported by policy.

*How these comments have been taken into account in the First Draft Local Plan:*

The National Planning Policy Framework is supportive of proactively facilitating rollback or relocation for development at risk from coastal change. The First Draft Local Plan includes a policy relating to coastal change rollback or relocation (SCLP 9.4). This policy does not allocate land for rollback or relocation but allows for the consideration of such on a case-by-case basis where proposals meet certain criteria. Public consultation would be facilitated through the planning application process, in this instance.

**Q111 – Could houseboats, floating homes or caravans be used as an alternative or temporary means of re-housing those affected by coastal erosion?** (25 responses)

**Summary of Key Issues:** This question aroused a diverse response; some respondents felt it was a good idea but mainly on a temporary/short term basis. Other respondents felt that it would not be suitable for coastal areas and could potentially lead to an unwanted permanent solution. Other respondents expressed uncertainty.

Government agencies did not consider this an appropriate response to coastal erosion due to the inevitable increased risk of flooding. One respondent felt that this is not an appropriate response to coastal erosion based on the level of risk to properties in SCDC. Another respondent felt that there should be a like for like replacement of property at risk from coastal erosion.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan does not allow for houseboats, floating homes or caravans to be used as an alternative or temporary means of re-housing those affected by coastal erosion. Policy SCLP 9.4 only facilitates the replacement of permanent buildings within the Coastal Change Management Area forecasted to be affected by coastal change within 20 years of the date of the proposal.

Policies SCLP 5.15 and SCLP 5.16 address the use of houseboats and residential caravans as permanent dwellings, not permanent buildings.

**Q112 – How can the council attract buy-in from coastal business owners to contribute to the costs of coastal protection?** (23 responses)

**Summary of Key Issues:** The majority of respondents to this question were questioning the need for business owners to contribute to the cost of coastal protection. Instead, it was suggested that the focus should be on how the whole community can contribute to the costs of coastal protection. It was also implied that business owners should be incentivised to contribute to the costs by, for example, simplifying the planning regime or reducing contributions. Other respondents suggested that a local levy or voluntary contribution should be introduced.

Some respondents suggested that evidence should be attained and used to demonstrate the cost benefit to businesses. One respondent referred to the concept of enabling development and how this has not been addressed in the document, as it provides a potential avenue for creating coastal protection funding.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan does not include a levy or any financial incentive for business owners to contribute to the costs of coastal protection. This will be addressed outside of the Local Plan.

The Council is aware of the potential for enabling development proposals to contribute to the costs of coastal protection and will consider supporting such proposals where they are justified, transparent and deliverable as a comprehensive package with clear community benefits.

**Q113 – Should the CCMA be defined in an area where the SMP policy is to ‘hold the line’, subject to evidence of how coastal protection can be funded in this area?** (18 responses)

**Summary of Key Issues:** The majority of respondents agreed with this approach, one of those respondents agreed subject to the availability of funding. Some respondents disagreed with this approach as they either considered ‘managed retreat’ as a better approach, the necessary funding isn’t available or that it doesn’t relate to the role of the CCMA .

Government agencies expressed scepticism in response to this question as it suggests a review of the SMP, which is outside the remit of the Local Plan, and suggested that if it is to be taken forward it should not encourage further development. One respondent felt the question was unclear.

*How these comments have been taken into account in the First Draft Local Plan:*

The existing policy approach in the Felixstowe Peninsula Area Action Plan will be carried forward in

the First Draft Local Plan. The Coastal Change Management Area will therefore not be defined where there is a 'hold the line' approach at Felixstowe. However, there will still be a requirement for a Coastal Erosion Vulnerability Assessment to be completed for proposals 30 metres landward of the 'hold the line' line. For the rest of the District a Coastal Change Management Area will be defined.

A level of flexibility has been included in the wording of Policy SCLP 9.3 to allow for consideration of evidence emerging from a review of the Shoreline Management Plan, which is expected to occur within the lifespan of the Local Plan.

#### Q114 – What wider sustainability benefits to the community could justify development taking place in an area of flood risk? (29 responses)

**Summary of Key Issues:** The majority of respondents were of the opinion that no wider sustainability benefits could be derived from development within areas at risk from flooding. Notwithstanding this, wind farm developments, open space, tourism, development related to the sea/estuary and/or development designed to withstand flooding were recommended by some of the respondents. Some respondents were also in favour of development in areas at risk from flooding once they are demonstrated to be safe and implement flood resilience measures. One respondent was in favour of development in areas at risk of flooding if there is no other viable option.

A number of respondents recommended the concept of enabling development where development not normally permitted would be allowed in order to help fund flood protection elsewhere. However, one respondent highlighted that they were not in favour of enforcing enabling development in their area.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 9.5 of the First Draft Local Plan does not permit new development or the intensification of existing development in areas at high risk of flooding unless safety requirements detailed in the Flood Risk National Planning Policy Guidance are satisfied. Namely, the sequential test and, if needed, the exception test. Therefore, any new development permitted in areas at high risk of flooding would need to demonstrate a need to be located in that area and would be required to implement various flood resilience measures.

The Council is aware of the potential for enabling development proposals to contribute to the costs of flood protection and will consider supporting such proposals where they are justified, transparent and deliverable as a comprehensive package with clear community benefits.

#### Q115 – Are there any particular uses that land at risk of flooding could be used for? (34 responses)

**Summary of Key Issues:** One respondent raised concerns regarding flood defences on the Blyth Estuary, citing a lack of support from the Local Authority in remedying the situation. Another respondent cited the use of SuDS to mitigate flood risk and that the Local Plan should refer to this. Some respondents also questioned whether any development should be occurring on land at risk of flooding. The rest of the respondents suggested the following potential uses for land at risk of flooding:

- Renewable energy solutions.

- Wildlife sites i.e. wildfowl park, wetland habitat, saltmarshes.
- Recreational areas for water-based activities.
- Agriculture.
- Leisure or car parking under flats.
- Playing fields.
- Allotments.
- Green infrastructure.
- Tourist accommodation.
- Commercial and recreational uses subject to proper flood response plans.
- Residential accommodation in communities protected from flooding.
- Ancillary uses to residences and businesses.
- Seasonal parking.

Studio/workshops at ground floor level, seasonal/limited accommodation above.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a dedicated policy for sustainable drainage systems (Policy SCLP 9.6). This policy details SuDS requirements for developments of 10 dwellings or more, non-residential development upwards of 1,000 sq. m or development that equates to 1 hectare or more. The current Local Plan does not have a dedicated policy for sustainable drainage systems.

Uses proposed on land at risk of flooding will be considered against Policy SCLP 9.5, the latest Strategic Flood Risk Assessment and the flood risk national planning policy guidance. No particular uses for land at risk of flooding have been identified that will not be evaluated through the implementation of Policy SCLP 9.5.

**Q116 – Should the Local Plan Review identify sites for renewable energy development across the District? Which areas across the District would be appropriate and for which types of technology? (37 responses)**

**Summary of Key Issues:** This two-pronged question evoked a generally positive reaction from respondents, although a number of respondents expressed their wishes for wind farms to remain off shore. Reference was made by one respondent to an East of England study that details renewable energy capacity on a regional basis and may be useful in the identification of suitable sites for renewable energy.

A lot of respondents also emphasised the need to locate renewable energy development close to or within existing development and/or to include it within new developments going forward. One respondent highlighted a community friendly renewable energy approach used in Germany which could increase community's receptiveness to renewable energy development in their area. Other respondents also favoured such a community based approach.

Another respondent suggested the inclusion of proximity to power infrastructure and other infrastructure (including existing buildings, hardstandings and roadways) should be considered when identifying sites. Various other respondents, including government agencies, highlighted the need to take note of heritage and environmental constraints during this process. Airfields, car parks and sites not suitable for housing development were suggested by some as potential areas for renewable energy development. However, there was a difference of opinion whether agricultural land should be identified for renewable energy development or not, particularly relating to solar panels/farms.

The screening of solar farms was also a contentious issue with respondents. The majority favoured solar farms, once well screened. Respondents who reacted negatively cited the cost of renewable energy and that there is already sufficient renewable energy development off shore.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a policy relating to low carbon and renewable energy (Policy SCLP 9.1). This policy outlines criteria for proposed low carbon and renewable energy developments. The criterion includes a requirement to provide evidence of a local source of fuel, facilitation of the necessary infrastructure and consideration of a number of constraints relating to the environment.

In general, Policy SCLP 9.1 supports low carbon and renewable energy developments where they provide benefits to the local community and are supported by the local community. This is particularly demonstrated by the fact that the policy allows for Neighbourhood Plans to identify suitable areas for low carbon energy development.

No particular areas were identified as appropriate for low carbon energy development as this will be undertaken where a Neighbourhood Plan is commenced.

**Q117 – How can the Local Plan Review encourage new residential developments to reduce carbon emissions? (39 responses)**

**Summary of Key Issues:** Quite a few respondents suggested the imposition of tougher standards and regulations on developers, particularly at the planning permission stage. Others identified a means of incentivising practices that help to reduce carbon emissions by reducing CIL payments, for example. It was also suggested that a meaningful proportion of the energy consumed by new buildings should be provided from an on-site renewable source.

Respondents also suggested placing large scale housing within walking distance of the workplace, transport, retail and leisure facilities. Indeed, a number of respondents referred to the use of sustainable forms of transport such as cycling, walking and public transport as a means of reducing carbon emissions. Provision of on site car charging points, fast broadband, grey water systems and the integration of solar roof panels were also mentioned as possible ways of reducing carbon emissions.

Some respondents felt it should be standard practice for developers to build houses that minimise carbon emissions. One respondent felt that the Council's policy on the design of listed buildings prevented opportunities to reduce carbon emissions; Guidance on this matter is provided by a government agency in their response. Another respondent felt that the Council should mitigate against the Urban Heat Island effect by, for example, preventing infill where compensatory planting cannot be achieved.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 9.2 of the First Draft Local Plan requires new developments of more than 10 dwellings to achieve higher energy efficiency standards than those set out in the building regulations. The viability of this policy approach will be informed by a Viability Study which will be undertaken in time for the Final Draft Plan consultation. The CIL Charging Schedule will also be reviewed and consulted upon during the Final Draft Plan consultation. It will be clearer at this stage, which policy approach

for sustainable construction will be most viable and whether incentives can be provided through the reduction of CIL payments. In the meantime, the Council is taking an environmentally proactive approach to energy efficiency standards in new developments. This approach is being taken in light of consultation responses, the Suffolk Climate Action Plan and the government's recently published 25 year Environment Plan. Notwithstanding this, in exceptional cases where it can be demonstrated that viability will become an issue due to the implementation of Policy SCLP 9.2, reduced energy efficiency standards will be permitted.

Policy SCLP 9.2 also encourages the use of locally sourced, reused and recycled materials and on-site renewable energy generation. This will help to reduce the carbon footprint of new developments.

Policy SCLP 7.1 relates to sustainable transport and supports development where it is designed from the outset to facilitate and encourage travel using non-car modes to access the workplace, schools, services and facilities. This will lead to reduced levels of traffic, increased use of sustainable transport modes and shorter journey times.

Policy SCLP 7.2 requires the provision of vehicle charging points for proposals involving vehicle parking. This will help to encourage greater take up of low-emission vehicles and ultimately reduce carbon emissions in new developments.

Policy SCLP 8.4 supports the improvement of digital infrastructure across the District. This will lead to faster levels of broadband which could increase the ability of people to work from home and subsequently reduce carbon emissions created by travelling to work.

Policy SCLP 9.7 requires developments of 10 dwellings or more or non-residential developments upwards of 1,000sqm or that equates to 1 hectare or more to include grey water recycling systems. This will lead to a greater efficiency of water usage in new developments which will reduce demands on the water supply network and ultimately increase the sustainability of new developments.

In summary, the comments of respondents regarding sustainable construction and carbon emissions have informed a number of policies within the First Draft Local Plan.

#### **Q118 – Should the Local Plan Review require other kinds of development like employment, retail, leisure and tourism to meet higher standards of energy efficiency? (39 responses)**

**Summary of Key Issues:** Respondents overwhelmingly agreed that the Local Plan should require other kinds of development to meet higher standards of energy efficiency. Some respondents suggested that this should be done through the planning permission stage. Other respondents felt that the Local Plan should provide guidance and encouragement instead of mandating higher standards of energy efficiency. One respondent refers to the Suffolk Climate Change Action Plan which it is felt planning policies could contribute to. Guidance and policy suggestions are provided by government agencies in their responses.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 9.2 of The First Draft Local Plan requires new non-residential developments of equal or greater than 1,000sqm gross floorspace to achieve the BREEAM 'Very Good' standard or equivalent. The BREEAM standards are commonly used by Local Authorities nationwide and are generally accepted by central government as national standards for energy efficiency in non-residential

developments.

## Design

### Q119 – How can we improve the design and quality of estate scale development? (48 responses)

#### Summary of Key Issues:

- There has been strong support for the implementation of design guides/codes. It has been suggested that 'Building for Life 12' and 'Garden City Principles' should be adopted, with particular reference to estate scale developments. However, these can also be used for smaller developments.
- Another key talking point throughout the comments has been the approach the council should take to developers. All of these comments suggest a firmer stance is needed when negotiating on design principles, and less weight should be given to the developer's viability claims in comparison to the quality of their design proposals. As part of this it has been suggested to use a number of smaller developers to build out estate scale developments. This would reduce the power individual developers have to negotiate with the council over design standards and provide difference in design across the development.
- There seems to be a general belief that new and exciting designs should be restricted in District, especially in the villages. This is coupled with beliefs that design should not deviate from the existing character.
- There have been comments strongly opposed to the one size fits all approach to housing that some estate scale developments take. Hence, there is a contradiction in comments between restricting new, exciting designs and preventing the same designs popping up across the District.
- Monitoring the track record of developers and architects in delivering on good quality design, and prioritise these developers/architects over others if possible? This can be applied not only to design but to other factors such as affordable housing provision, build out of developments on time etc. Perhaps, developers/architects that have a track record of high quality design should be promoted by the council.
- Another key feature of comments has been an appreciation of good quality green space in estate scale developments. The permeability of large developments can be improved through green corridors. These can also be improved by linking green spaces of adjoining developments through communication and positively promoted throughout development enterprises.

#### *How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.1: Design Quality identifies the consultation feedback referencing the support for 'Building for Life 12' and specifically implements BFL12 within the policy.

The policy also emphasises a strong approach to innovative and outstanding design, which had been highlighted as an important objective throughout consultation responses in increasing the diversity of residential design throughout the District and reducing the prevalence of one-size-fits-all residential development.

In response to comments suggesting the monitoring of good quality design, the Suffolk Coastal Quality of Place awards, reviewed by judges which are comprised of local design experts and chaired by District Councillors, are a celebration of the effort being made by people across Suffolk Coastal to add to the quality of our environment, by creating high quality designs in both the built and natural environment and helping to conserve our historic buildings. The best designed developments across the District are recorded on the Council's website.

#### Q120 – How can we improve design quality through planning policy? (36 responses)

##### Summary of key issues:

- The majority of comments reflect a desire for planning policy to implement clear standards/guidelines so as to make sure developments meet adequate standards. However, this may have the unintended consequence of producing similar designs across different developments as there may be certain ways developers can meet the design standards while keeping costs low. This may make deviation from these practices uncommon as profits are key to business success. These business practices may spread to become industry practices and hence lead to similarities in designs across different developments.
- There are comments that emphasise the importance 'locally distinctive' design. However, there seems to be confusion about the term, with many comments having detailed their desire for locally distinctive design and go on to denounce ideas of new, exciting and creative design.
- On the other hand, there are comments that promote locally distinctive design and emphasise an openness to creativity.
- There are other comments that seek more creative design, and emphasise the importance of creating new and exciting contributions to the character of places. Comments mention the use of ecological materials, energy efficient heating systems, reuse of natural resources, and many more techniques.
- I have noted that where respondents comment positively about creativity they are usually talking about innovative ways of being energy efficient in terms of new systems, and less about new and exciting design of buildings.
- Suggestion has been made, as it has been in the previous question, of creating a system whereby the track record of developers is noted for (design standards of) each development and then promoting the developers that have a better track record. This idea can be utilised for more than just design, e.g. affordable housing, build out of site on time, etc.
- Comments also mention the importance of policies being enforceable. Sounds simple but is an important objective in creating adequate policies.

##### *How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.1: Design Quality sets out clear requirements that development must meet in order to gain planning permission and deliver a good design standards.

The policy responds to the support for innovative and outstanding designs by encouraging creative design whilst also emphasising the importance of local character. Hence, good design must balance the requirement to understand and be sympathetic towards local character whilst also adding to local character in exciting and innovative ways.

#### Q121 – How do we promote locally distinctive design? (26 responses)

##### Summary of key issues:

- The most prominent suggestion for promoting locally distinctive design has been the provision of up to date design guidelines/codes/standards/policies. Within which the use of high quality materials and diversity of designs has been promoted. Also mentioned has been the ability for the design standards to be enforceable and where developments are deemed inadequate, in terms of design, they should be refused, or collaboration should take place to address the design issues until they are acceptable to the requirements set out in the design guides/policies. Historic England has made reference to the importance of design policies in protecting the historic environment but also state this should not prevent contemporary/creative design so long as the historic environment is appreciated.
- Design competitions have been a popular suggestion. A related suggestion has been made for a design competition but not for individual developments but that would encompass locally distinctive design across Suffolk Coastal and be a focal point for future planning applications. This suggestion may lead to repetitive designs as applications might mirror the exact details of the example design with the knowledge that it would be an acceptable design.
- There have been suggestions emphasising the importance of recognising developers, architects etc. that consistently produce high quality, locally distinctive designs. A developer track record could be set up fairly easily. However, the act of promoting one private developer over another on the council's behalf could be considered as promoting private interests.
- Another suggestion has been to collaborate with different stakeholders throughout the planning system. Working with developers at pre-app stage already takes place to increase the likelihood that an application is acceptable and is approved. This process is important and useful, especially for larger developments that may have more issues to overcome.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.1: Design Quality sets out clear requirements that development must meet in order to gain planning permission and deliver a good design standards. If development proposals do not meet all of the criteria they will be refused.

The policy emphasises the importance of the historic environment to local character, while also encouraging creative and contemporary design that appreciates the historic environment.

In response to comments suggesting the monitoring of good quality design, the Suffolk Coastal Quality of Place awards, reviewed by judges which are comprised of local design experts and chaired by District Councillors, are a celebration of the effort being made by people across Suffolk Coastal to add to the quality of our environment, by creating high quality designs in both the built and natural environment and helping to conserve our historic buildings. The best designed developments across the District are recorded on the SCDC website.

In response to encouraging greater collaboration between stakeholders, the policy encourages the use of 'Building for Life 12' for all major residential developments (10 dwellings or more) in order to constructively aid the design of potential developments. This is best utilised in the form of pre-application communication between applicant and planning officer.

**Q122 – Is it possible to secure high quality design which is locally distinctive through factory build development? (27 responses)**

**Summary of key issues:**

- The general consensus is that it is possible for factory built houses to be locally distinctive while also being of high quality design. One respondent comments 'As it is possible to specify a car built on a production line many thousands of miles away with a large array of options, it must also be possible to build a modular building to include variety and good design'.
- It has been suggested that factory built housing should be possible in large scale developments in bringing variety throughout the development. However, comments suggest the use of factory built houses should not be utilised or encouraged for small developments (defined as 3-10 units).
- Comments that disagree believe factory built units would not be able to offer interesting designs, and instead would lead to a homogenous and repetitive landscape of row on row of textbook houses. They also believe factory built units would lack the quality that should be required in Suffolk Coastal.
- In order to ensure factory built units are high quality some comments have suggested the use of design guidelines/codes/policies, which set the overall standards, thereby preventing the low cost low quality case that is feared may arise from factory built units. In addition, the design guides should possibly suggest/require developments of factory built units to have a degree of variety of designs. This could prevent the same designs, which may well meet the design standards, from occurring too often.

*How these comments have been taken into account in the First Draft Local Plan:*

The design policies emphasise high quality design throughout and encourage innovation and creativity in design proposals. Policy SCLP11.1: Design Quality states advances in construction technology have enabled the viable delivery of modular and pre-fabricated development options that contribute positively to local character and locally distinctiveness. The Council also seeks to consistently deliver a significant quantum of affordable housing due to the prevalence of high house prices across the District. In this regard, prefabricated and modular built housing has potential to deliver well designed affordable housing at lower costs than standard residential developments.

**Q123 – Should large scale developments be required to follow the "Garden City" principles? (40 responses)**

**Summary of key issues:**

- Overwhelming support for the garden city principles for large scale developments. The majority of comments like the 'green England' idea behind the garden city principles. However, contradictorily they also mention their dislike of urban sprawl and a protection of the edges of settlements. Important to note the majority of comments that support the garden city principles do not explain or go into any detail as to why they have made that decision, merely commenting 'yes'.
- Others have agreed with the ideas of garden city principles to an extent. Some have suggested the principles should be upheld where they restrict innovative and creative designs. Others have suggested garden city principles may not be appropriate across the whole District or for every development and instead each development should be understood on its own merits. Hence, the garden city principles should not be strictly applied to all developments.
- 2 comments disagree with the use of garden city principles. They suggest the high land value before development will result in the low density garden city proposals being extremely unaffordable for local people, even more so than is currently the case. Hence, garden city

principles should perhaps not be utilised as they have been historically. They also suggest developments should supply the required services and facilities in an environmentally friendly way with good overall design but that the garden city ideology is not the best mechanism to provide this.

*How these comments have been taken into account in the First Draft Local Plan:*

Garden city principles will be utilised throughout our large site allocations, North of Felixstowe and South of Saxmundham. These sites have potential to deliver significant affordable residential growth alongside infrastructure benefits including education and community facilities amongst others whilst providing significant areas of open space, in line with garden city principles.

Policy SCLP11.1: Design Quality emphasises the importance of identifying landscape and topographical features and retaining and enhancing these where possible, as well as integrating hard and soft landscaping features into developments.

#### **Q124 – Should the principles of "Building for Life 12" be used as a tool to improve the design quality of new development? (27 responses)**

##### **Summary of key issues:**

- The majority of respondents agree with the use of Building for Life 12 (BFL 12) to ensure high quality design standards. One comment has suggested acceptable developments should have to meet at least 9 of the 12 questions of BFL 12.
- Others have suggested BFL 12 is a good programme that should be used but also stress that it should not be the only programme used to assess the design quality of developments. Further research on other ways of assessing design quality should be undertaken.
- Another comment suggests BFL 12 is a good programme but acknowledged that it will only be as good as the implementation of it. It must be enforced where developments do not meet the minimum standard. In addition, exemplary organisations that go beyond the acceptable design quality should be encouraged and held as an example what is possible.
- Another comment states BFL 12 is predominantly designed for urban developments and that we should adjust the programme to suit our more rural setting.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.1: Design Quality encourages the use of 'Building for Life 12' for all major residential developments (10 dwellings or more) in order to constructively aid the design of potential developments. This is best utilised in the form of pre-application communication between applicant and planning officer.

In regard to making an example of developments of outstanding design, the Suffolk Coastal Quality of Place Awards, reviewed by judges which are comprised of local design experts and chaired by District Councillors, are a celebration of the effort being made by people across Suffolk Coastal to add to the quality of our environment, by creating high quality designs in both the built and natural environment and helping to conserve our historic buildings. The best designed developments across the District are recorded on the Council's website.

#### **Q125 – Should local housing densities be set for new developments? (54 responses)**

##### **Summary of Key Issues:**

- The majority of comments agree with establishing density standards for new developments to help guide developers and provide reassurance to all parties as to what is deemed appropriate. Suggestion has been made for the density standards to be flexible and aware of the many different factors that may effect the sustainability of delivering set densities.
- Comments mention densities should be related to the size of settlements, towns gaining higher density developments than villages.
- The majority of these comments also mention the need for density calculations to reflect the site context.
- The comments that disagree suggest an overarching density standard would be too much of a blunt instrument and instead the density of new developments should be set on a site by site basis. Others suggest there should be lower density housing mixed into areas of higher densities to create a diverse arrangement and type of housing that attracts a wide variety of people. On street car parking and types of dwellings desired must be taken into account along with a host of other considerations. Hence, comments suggest density standards, no matter how wide ranging, do not reflect the subtleties of different sites.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan has not set density standards across the District. Although it is important to encourage the efficient use of land, it is the Council's view that setting density standards would result in a too rigid instrument lacking the subtlety needed to evaluate site specific constraints and opportunities, which is also a common perspective of consultation responses. Site allocations detail appropriate densities which have been evaluated in response to the specific setting of each site in relation to its surroundings and also the opportunities identified on each site.

**Q126 – Should different design principles be applied to housing developments at high/low densities? For example, avoid using detached housing at higher densities in order to maintain sufficient space between buildings? (30 responses)**

**Summary of Key Issues:**

- The majority of comments agree with the need for different design approaches for different density developments, and suggest design principles should not only vary as a result of densities but for a number of other reasons. Decreasing the uniformity of new developments in different settlements is a key concern for respondents.
- Comments also suggest design principles and densities should reflect the character and context of the surrounding area. Although it is important that new developments do not undermine existing buildings, it is also important that new developments express unique, interesting and exciting designs, which has been expressed in previous design representations. A contradiction that may arise is that the rural settlements may be seen to have a relatively similar character and context. Therefore, developments that seek to reflect the character of the area may in effect be reflecting the character of the rural part of the District and hence lead to similar designs across the rural areas. Further, this may contradict the desire of respondents for unique and exciting designs.
- Comments that disagree suggest design principles should not be applied based on different densities as each development should be assessed on a case by case basis. The main justification for these responses is to protect the character of the surrounding area.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.1: Design Quality strongly encourages local distinctiveness as a key contribution to local character and high quality design. This will help alleviate concerns of respondents regarding the uniformity of developments across the District. In this regard, development proposals are encouraged to identify site specific and settlement specific character with which to enhance.

#### Q127 – When would development of residential back gardens be inappropriate? (38 responses)

##### Summary of Key Issues:

- The nature of this question and the way it is asked make it difficult to get a sense for the majority view as there are many different opinions. Having said this, there is a general sense that development of gardens should be avoided if possible as they are seen as an important part of family, community, and environmental life. The degree to which respondents feel development of gardens is appropriate is demonstrated in the variety of comments received.
- The most common comment relates to the adverse impacts the development will have on neighbours and the community. Overlooking, intrusion, and space between houses are mentioned a number of times.
- Another common response has been that of the spaces between houses and the size and shape of gardens. Here comments suggest this is part of the character of settlements and hence development of gardens not be in keeping with the character of the area.
- One comment, from Greenways Countryside Project, mentions the importance of gardens as wildlife corridors. Removal or interruption of these natural corridors will negatively impact on the quality of habitats for wildlife.
- Comments have suggested the remaining size of gardens, after development, should be an adequate area (not too small). Gardens are seen as important for quality of life for residents and wildlife as discussed above. These comments also mention the lack of garden size that accompany new housing and state existing gardens should be protected to maintain a balance of properties with different sized gardens.
- Respondents discuss the importance of car parking availability when deciding on the appropriateness of the development of gardens.
- Some comments have made reference to the existing physical limits boundary, and that any development of gardens within the physical limits boundaries is acceptable.
- A number of respondents have also suggested development of gardens is never appropriate, citing gardens are an important part of the character of Suffolk settlements as the main reason for this decision.

##### *How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP11.2: Residential amenity details the factors which must be considered by developers and planning officers in producing and assessing applications. Hence, concerns raised by respondents regarding the impacts of back garden development on residential amenity will be alleviated by detailed considerations of these impacts both individually and cumulatively, and for existing and future residents.

Regarding concerns that the size and shape of back gardens are a key part of the character of settlements, policy SCLP11.1 Design Quality supports approaches that identify, retain and enhance local character through local distinctiveness.

#### Q128 – Should the Council adopt additional optional standards in respect of accessibility, internal space and water efficiency? (29 responses)

**Summary of Key Issues:**

- Majority of comments believe optional standards in water efficiency, accessibility, and internal space would be a good idea.
- Anglian Water has commented with a link to an evidence based document. Here Suffolk Coastal is designated as an 'Area of serious water stress'. They go on to suggest the additional cost of the standards is likely to be £6-9 per dwellings. They go on to recommend the implementation of additional water efficiency standards (110 litres per occupier per day) for residential developments.
- The aging population of the District has been mentioned as an important consideration in the promotion of accessibility standards.
- Less certain were comments regarding internal space. It has been suggested that internal space standards would lead to the same size plots but increase in dwellings heights, which could negatively affect accessibility.
- Some comments agree with the objective of increasing water efficiency for example. However, they also raise knock on effects that this could create, the most prominent of which has been an increase in house prices. A comment has suggested instead of new housing being fitted with additional extras initially they should be able to be fitted with the optional additions once they have been purchased and the resident can decide whether or not to implement any additional standards. This would give residents greater flexibility. However, may not meet the ideal standards.
- Another comment has suggested if SCDC wants to introduce new requirements on developers then perhaps other requirements should be toned down. The example used was CIL. However, CIL is a requirement whereas the question refers to optional standards, and so should not be considered a like for like comparison.
- Comments that disagree argue the additional standards will result in the extra costs being past onto the residents in terms of increasing house prices.
- Another comment suggests the additional standards should not be implemented and the market should determine these needs.

*How these comments have been taken into account in the First Draft Local Plan:*

Regarding water efficiency, Policy SCLP9.2: Sustainable Construction states all new residential developments in the District should achieve higher the water efficiency optional technical standard of 110litres per person per day.

Policy SCLP9.2: Housing Mix has implemented greater accessibility standards in the form of a requirement for 50% of dwellings on developments of 10 units or more meeting the accessibility standards of M4(2) 'accessible and adaptable dwellings' of the buildings regulations.

## Heritage

**Q129/130 – What should be included in a positive strategy for the protection of heritage assets across the District? (75 responses)**

**Summary of Key Issues:** Respondents expressly stated that the setting as well as the heritage asset itself should be afforded protection, including the landscape character, underground archaeology

and any related monuments. Suitable protection for non-designated heritage assets was also emphasised as an issue. A number of respondents stated that the obligation must be on the owner to protect the heritage asset and if not, there should be a means to force compliance from the owner in that respect. On the contrary, one respondent emphasised the need for flexibility in understanding the cost of maintaining heritage assets. Added to this, one respondent suggested utilising CIL and S106 funding to finance heritage asset maintenance. Some respondents suggested other means of protecting heritage assets, for example, through Neighbourhood Plans, Article 4 directions, EIAs, Site Allocations, Conservation Management Plans, the planning permission stage i.e. planning committee and employing Conservation Officers in the Council.

One respondent suggested incorporating eco-principles into the design and maintenance of heritage assets. Another respondent suggested mapping all of the heritage sites, erecting plaques at each site and providing schools with funding to maintain and promote them. Indeed, raising awareness of heritage assets was a common theme amongst respondents. One respondent recommended the use of a draft policy relating to heritage in the Colchester Local Plan.

One respondent suggested that a clear definition of the heritage asset should be provided before any policies are devised to protect them. Some respondents were in favour of stricter protections for heritage assets. A government agency suggested that a holistic approach should be taken in the protection of heritage assets and that the historic environment should be considered throughout a planning document.

A number of respondents referred to national policy and guidance on the matter of heritage assets. Various respondents stated that the views of the local community should be included when deciding to protect a heritage asset. Recording and mapping heritage assets in consultation with the general public and relevant bodies was a recurring theme throughout the responses. One respondent suggested that a negative approach should be taken in the form of emphasising the potential adverse impact development could have on heritage assets. Some respondents felt that the current policy in this area is suffice.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan includes a number of policies relating to heritage. The thrust of these policies emanates from the National Planning Policy Framework which outlines a clear policy approach for the protection of heritage assets.

There does not exist a means through the planning system by which the Council can force the owner of a heritage asset to protect it. However, the Council can refuse planning permission for development of a heritage asset where it is evident that it has been deliberately or intentionally neglected. This is addressed in the supporting text of the Historic Environment section. The supporting text also provides for a heritage impact assessment and/or archaeological assessment where a proposal impacts on the setting of a heritage asset and/or known or possible archaeological site. Added to this, Policy SCLP 11.6 specifically requires a full archaeological assessment where a proposal is going to effect an area of known or suspected archaeological importance.

The Regulation 123 list does not currently identify the maintenance of heritage assets as infrastructure that may be funded by CIL. This may be reviewed in the near future outside of the Local Plan process.

Policy SCLP 11.4 allows for Neighbourhood Plans to identify and protect non-designated heritage assets as long as they meet the criteria for identifying non-designated heritage assets developed by

the Council. Policy SCLP 11.5 supports the implementation of Conservation Area Appraisals and Management Plans to protect heritage assets. It also provides protection from demolition for non-listed buildings in Conservation Areas under certain criteria.

Reference is made, in the supporting text for Sustainable Construction, to Historic England's advice regarding the implementation of energy efficiency regulations in historic buildings. This could be used to incorporate eco-principles into the design and maintenance of heritage assets.

The Council does not currently have the resources and funding to map all of the heritage sites and to erect plaques at each site. This could be re-considered if funding and resources improve in the future.

However, Policy SCLP 11.3 provides for the interpretation of the key features of a heritage asset which encourages developers and the local community to raise awareness of heritage assets. This will be undertaken in partnership with developers and local communities on a case-by-case basis.

A definition of a heritage asset is detailed by national planning policy and is included in the supporting text for the Historic Environment. The level of protection afforded to heritage assets in the policies of the First Draft Local Plan are based on the level of protection outlined in the national planning policy framework.

The local community are provided the opportunity to engage with the process of identifying and protecting non-designated heritage assets through the Neighbourhood Plan process. The planning application process provides further opportunity for the local community to express their views about the protection of heritage assets, where a proposal relates to a heritage asset.

#### **Q131 –What level of protection should be given to non-designated heritage assets and locally listed buildings? (38 responses)**

**Summary of Key Issues:** Many respondents suggested that full protection should be afforded to non-designated heritage assets, similar to that of designated heritage assets. It was suggested by one respondent that a forum could be hosted by the University of Suffolk to decide which non-designated heritage assets should be afforded a higher level of protection. Another respondent suggested that protection should be according to the merits of the asset itself. Including non-designated heritage assets as a material planning consideration was also muted. Indeed, one respondent suggests that inspectors consider it an important material planning consideration based on past planning appeals.

A number of respondents referred to national policy on non-designated heritage assets and how a balanced judgement against other planning considerations is required when judging planning applications that affect them. One respondent suggested that the views of the general public on protecting non-designated heritage assets should be considered through the planning committee process. Another respondent suggested that it should be the responsibility of the SCDC conservation officer to draw up a list of non-designated heritage assets with the community. Some respondents felt that the existing policy approach afforded enough protection for non-designated heritage assets.

One respondent did highlight that non-designated heritage assets should not be allowed to fall into a state of disrepair as a means of gaining planning permission or increasing the likelihood of such.

*How these comments have been taken into account in the First Draft Local Plan:*

National planning policy does not allow for non-designated heritage assets to be given the same level of protection as designated heritage assets.

Policy SCLP 11.4 of the First Draft Local Plan allows for Neighbourhood Plans to identify and protect non-designated heritage assets as long as they meet the criteria for identifying non-designated heritage assets developed by the Council. This is considered an appropriate approach as the Council currently does not possess sufficient resources and funding to identify non-designated heritage assets across the District.

Where a non-designated heritage asset is identified, the level of weight attributed to the conservation of that asset will be relative to the number of criteria met in the Council's criteria for the identification of non-designated heritage assets.

The local community are provided the opportunity to engage with the process of identifying and protecting non-designated heritage assets through the Neighbourhood Plan process. The planning application process provides further opportunity for the local community to express their views about the protection of non-designated heritage assets, where a proposal relates to a non-designated heritage asset.

National planning policy allows the Council to refuse planning permission for development of a heritage asset where it is evident that it has been deliberately or intentionally neglected. This is addressed in the supporting text of the Historic Environment section.

## Landscape

### **Q132 – Is a Landscape Character approach to considering the impact of development on the landscape preferable to retaining Special Landscape Areas for this purpose? (51 responses)**

There was a mixed response to this question. There was support for a move to a Landscape Character approach, with respondents highlighting the benefits of having an approach that could be applied across the whole District. However, much of this support was caveated by concerns that any new approach did not result in the 'watering down' of protection for high value landscapes. Similarly, many supporting the retention of SLAs highlighted the need to ensure strong policy protection for sensitive landscapes.

Whichever approach is taken forward, many respondents highlighted the need to ensure that the policy is underpinned by robust and defensible evidence.

Important that any Landscape Character approach includes heritage considerations. Some respondents suggested a combined approach, retaining the SLAs and applying a Landscape Character approach outside these areas. A number of responses raised concerns that they did not sufficiently understand the implications of moving to a Landscape Character approach and therefore did not feel they could fully answer the question.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a policy on Landscape Character which is informed by the Landscape Character Assessment and Settlement Sensitivity Assessment that has been commissioned and published since the Issues and Options consultation. The up to date landscape evidence follows the government guidance and examples of best practice and is in conformity with the NPPF. The evidence provides a robust and credible base from which to evolve from Special Landscape Areas to character areas.

Consultation responses have informed the landscape evidence and fully detail the rationale for the removal of Special Landscape Areas with a more comprehensive approach to landscape character across the District.

**Q133 – Other than those protected as part of the AONB and Heritage Coast, which other sensitive landscapes require special protection? (46 responses)**

There were a number of specific areas highlighted by respondents (including individual sites), and a number of areas which would already be afforded protection under other designations (SSSIs, conservation areas etc). Of those areas outside existing designations, the majority strongly related to wildlife/ nature sites, including river valleys, woodlands, ancient pasture, heathland, commons etc.

Some respondents also highlighted the need to protect historic elements of the landscape including evidence of historic human change to the landscape, ancient quarries/ sand and gravel pits etc.

In order to protect the setting of important landscapes, a number of responses suggested there is a need to give some level of protection to the areas adjacent to designated landscapes (AONB, Heritage Coast etc). A few respondents suggested all landscapes or at least those out Physical Limits Boundaries should be protected.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes many references and policy requirements in relation to the parts of the District within the designated AONB. The consultation responses have highlighted that locations within the AONB are important and the Council consider it appropriate to include a different policy approach to these areas.

Elsewhere across the District, where important landscapes or designations are identified, site specific allocations outline these as policy requirements. Site allocations (where possible) have been directed away from sensitive areas which acknowledges the consultation responses received.

**Q134 – Should areas of tranquillity be identified and protected and if so, which areas should be considered? (50 responses)**

There was a positive response to identifying and protecting tranquil areas and a suggestion that we undertake tranquillity mapping in order to support any designations. Work already carried out for the Deben Estuary was cited as a template to follow. A number of respondents highlighted the need to define clear criteria against which tranquillity should be measured and this included taking into account factors such as road noise and lighting. It was also suggested that a sound and sight buffer should be identified around designated tranquil areas.

Some respondents suggested that local communities working with Parish Councils would be well-placed to identify these areas. As for Q133 a number of specific sites and areas were suggested for

designation, many of which overlap with existing designations (AONB, local nature reserves, estuaries etc.)

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses to this question have influenced the Landscape Character policy and supporting text in the First Draft Plan. The policy includes reference to areas of tranquillity and dark skies which are identified in documents such as the Deben Estuary Plan and the AONB Management Plan

Areas of tranquillity may be identified through Neighbourhood Plans or other evidence base documents over the plan period.

**Q135 – In which areas should development be resisted to avoid settlement coalescence? (61 responses)**

A significant number of respondents felt that all areas between settlements should be safeguarded from development, with only a couple of reps suggesting a more relaxed approach to protecting these areas.

A number of specific areas were specifically flagged up for protection, in particular the areas between Ipswich and Felixstowe, Ipswich and Woodbridge, Martlesham and Woodridge, and between Saxmundham the surrounding settlements. Also highlighted (albeit by fewer respondents) were the areas between Aldringham, Thorpeness, Knodishall, Leiston and Aldeburgh and the coastal area more generally, and the areas between Melton, Bredfield and Ufford.

*How these comments have been taken into account in the First Draft Local Plan:*

Consultation responses highlighted a variety of locations across the District where settlement coalescence should be avoided. The First Draft Plan has taken the approach to avoid settlement coalescence in all parts of the District through the introduction of a policy on Settlement Coalescence. The policy seeks to restrict development on undeveloped land which maintains the separation between settlements in all parts of the District.

**Q136 – Which areas require special protection from development? (44 responses)**

As for previous questions, respondents suggested specific areas, a number of which would already be protected under other policy designations (Conservation areas, SSSIs, the AONB). Outside of these areas a number of respondents reiterated their desire to see all areas outside of existing settlements protected from development.

Again, it was also suggested that areas adjacent to the AONB and the Heritage Coast need to be given some level of protection in order to protect the setting of the designated landscape. Natural England specifically mentioned the need to reference maintaining the undeveloped coast. Historic England suggested undertaking some additional work to look at views, vistas and the setting of heritage assets.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan carries forward a policy on areas to be protected from development as well as includes reference to protecting the natural and built environment. Consultation responses highlighted the need to protect certain areas such as Conservation Areas and SSSI's, many of these designations are covered by other legislation and therefore it would be inappropriate to repeat the policy within the Local Plan.

Comments in respect of the undeveloped coast have been included within policies considering Coastal Change Management Areas, Flood Risk and Holistic Water Management.

#### **Q137 – Do breaks and gaps in-between buildings need to be given specific protection against development? (39 responses)**

A significant number of respondents simply answered 'Yes' to this question, with others highlighting the value of these gaps in terms of wildlife, views, health and quality of life.

A smaller number of respondents suggested a more flexible approach such as: assessing each case on its merits; only protecting those gaps in designated areas; and, potentially needing to take a different approach in settlements at the top of hierarchy. One respondent also suggested the need to ensure that areas afforded protection were supported by robust evidence and a criteria based policy so that development is not unduly restricted.

#### *How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan takes these consultation comments into account by providing a variety of policies dealing with residential amenity, character of the built environment and protection of the natural environment. Emerging policies have been informed by the consultation responses and seek to protect appropriate gaps and breaks in the built environment through specific criteria.

## Biodiversity and Geodiversity

#### **Q138 – Should development be promoted in areas which are deficient in Green Infrastructure provision with respect to biodiversity and geodiversity? (37 responses)**

**Summary of Key Issues:** The majority of respondents disagreed with this question. A number of respondents emphasised the importance of ecological corridors and protected habitats, in that they should be promoted and any impact from development on them should be mitigated. One respondent questioned why the Council would look to promote development in areas deficient in green infrastructure, thereby making it worse. Indeed, various respondents favoured a more positive approach in this regard.

Respondents also suggested imposing restrictions on development where green infrastructure exists instead of promoting areas deficient in green infrastructure. It was also suggested by various respondents that green infrastructure should be introduced where it doesn't yet exist; indeed one respondent suggested that all new development should include green infrastructure, thus helping to create a green infrastructure network.

From respondents that agreed with this question, an evidence informed decision that will not result in any ecological impact was supported. Various respondents also expressed support for this question if it leads to development on brownfield sites and is enforced outside the AONB.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 10.1 of the First Draft Local Plan provides for the protection of existing green infrastructure where a development is proposed that may impact existing green infrastructure. The policy essentially requires mitigation measures in the event that a proposed development is expected to impact existing green infrastructure. This is reflected by the fact that development proposals are required to include various forms of evidence, depending on the area impacted, to demonstrate any potential environmental impact and how it should be mitigated.

The Council has endeavoured to take a positive approach to policy making in this First Draft Local Plan. This is reflected by Policy SCLP 10.1 which allows for development in areas of existing green infrastructure provided satisfactory mitigation measures are considered acceptable and implementable. This policy also facilitates the enhancement of existing green infrastructure through the implementation of mitigation measures.

For existing compensatory habitats and Suitable Alternative Natural Greenspaces (SANGS), the First Draft Local Plan affords considerable weight to the conservation of such areas where they are included as part of large scale development proposals.

Brownfield sites registered on the Brownfield Sites Register will be considered favourably for development, in order to lessen the likelihood of environmental effects from development and to increase the likelihood of environmental net gain.

**Q139 – Should the Council explore further options to work collaboratively with neighbouring authorities and Natural England to determine a consistent policy approach to biodiversity and geodiversity?** (39 responses)

**Summary of Key Issues:** The overwhelming majority of respondents reacted positively to this question, some respondents did highlight that the local distinctiveness should not be compromised as a result of working collaboratively with neighbouring authorities. One respondent rejected this question on the basis that it would compromise the local character. Another respondent suggested that a green infrastructure strategy should be developed. A number of respondents suggested including Parish Councils and other relevant conservation and wildlife groups. One respondent suggested applying this approach to landscape matters as well.

*How these comments have been taken into account in the First Draft Local Plan:*

The Council is working in partnership with Waveney District Council, Ipswich Borough Council, Babergh District Council, Suffolk County Council and Natural England to develop a Recreational Avoidance and Mitigation Strategy (RAMS). This is an example of partnership working to achieve a unified approach to mitigate the impact of new development on the protected sites.

**Q140a –What level of protection should be given to locally designated sites of biodiversity value?** (43 responses)

**Summary of Key Issues:** Nearly all respondents stated that high or significant protection should be afforded to locally designated sites of biodiversity value. Some respondents suggested that the same level of protection as nationally designated sites of biodiversity value should be afforded to locally designated sites of biodiversity value. One respondent suggested a level of protection similar to that afforded to listed buildings. Another respondent stated that protection should be given according to the circumstances of each site. Respondents were generally concerned with the impact of development on locally designated sites.

A number of respondents emphasised the importance of biodiversity in general, including the contribution it pays to our way of life through pollination, food etc. One respondent urged the Council to protect County Wildlife Sites and sites with Biodiversity Action Plan habitats and species.

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Local Plan applies considerable weight to the protection of locally designated sites of biodiversity value commensurate with the level to which the site is designated. This is consistent with the national policy approach in this area.

**Q140b – Should the Council consider a policy which requires the creation of new habitats and enhancement of wildlife corridors on new development sites? (44 responses)**

**Summary of Key Issues:** Almost all respondents agreed, to varying degrees, with this approach. Some respondents suggested that such a policy be implemented at a level as low as 1 or 2 house developments whereas others suggested that the policy could be utilised for developments of 50 or more units. It was also suggested that such an approach should be taken at the planning stage of a development. Various respondents highlighted the need to protect habitats and wildlife corridors both large and small. One respondent offered a potential policy wording detailing requirements of new development proposals.

One respondent was of the opinion that this should be used as a last resort and that it would be better to retain such sites instead of recreating them after they are destroyed.

*How these comments have been taken into account in the First Draft Local Plan:*

Policy SCLP 10.1 of the First Draft Local Plan facilitates the creation of new habitats and enhancement of wildlife corridors on all new development sites.

**Q141 – Do you have any suggestions for Local Plan policies to support biodiversity retention and enhancement? (31 responses)**

**Summary of Key Issues:** Respondents inferred the following suggestions for Local Plan policies to support biodiversity retention and enhancement:

- Consult farmers, developers and landowners to negotiate an appropriate policy.
- Refer to SCC's 'Suffolk's Nature Strategy' document or provide clear guidance to applicants at an early stage of development to ensure biodiversity is considered.
- Cease building large scale developments.
- Require a biodiversity enhancement scheme as a condition of planning permission for all new major development.

- Acknowledge and protect areas of high biodiversity value.
- Require new builds to retain the native flora and to keep hard surfaces to a minimum.
- Conserve and enhance habitats next to footpaths in tandem with encouraging the use of footpaths.
- Consideration of the water cycle before the conclusion of the Local Plan.
- Undertake the same approach as IBC for potential development sites and ecological networks on the East Ipswich fringe.
- Do not build on greenfield sites and create more protected areas.
- Carry out a preliminary Biodiversity Assessment before any potential land for development is considered.
- Developments should be designed so that they are complimentary to wildlife and provide connections to surrounding green infrastructure.
- Introduce strategic scale 'mixed use' allocations that follow the principles of garden settlements.
- Include data on stone curlews in the Sustainability Appraisal of a potential site for development.
- Encourage the 'greening' of residential gardens along with the retention of hedges, streams and ponds.
- Recognition of marine designations from the East Marine Plan.
- Recognition of areas whose circumstances have created biodiversity.
- Include landscape requirements in all developments of any size.
- Better provision of trees using planning consent and enforcement measures.
- Provision of stronger enforcement measures to prevent dumping and the misuse of land.
- Include a requirement to avoid damage to biodiversity and aim to achieve no net loss of biodiversity.
- Conduct intensive studies to see how species interact with each other in any one specific area.
- Maintain exclusion zones for the most sensitive biodiversity sites.

*How these comments have been taken into account in the First Draft Local Plan:*

Farmers, developers and landowners, along with the general public, will be afforded the opportunity to influence policy relating to the retention and enhancement of biodiversity through the Local Plan consultation process.

The Suffolk Nature Strategy has influenced the First Draft Local Plan, in that; it takes account of the ecosystem services in coastal, riverine and estuarine areas.

To cease building large scale developments would contravene the growth strategy of the Local Plan and would significantly reduce the ability of the Council to meet housing targets.

Mitigation measures such as biodiversity enhancement schemes will be implemented where the evidence demonstrates a need for such mitigation measures. Retention of native flora, in this respect, may also be a mitigation measure undertaken as part of new build development.

Policy SCLP 10.1 of the First Draft Local Plan sufficiently acknowledges and protects areas of high biodiversity value. The policy also provides for the enhancement of existing habitats as part of development proposals.

The Council aims to undertake a Water Cycle Study in time for the Final Draft Plan consultation.

Under Policy SCLP 10.1 development proposals are required to include various forms of evidence, depending on the area impacted, to demonstrate any potential environmental impact and how it should be mitigated. However, a preference is expressed in the supporting text of this policy for the development of brownfield sites.

Connections to surrounding green infrastructure and ecological networks as part of new developments are supported by Policy SCLP 10.1.

Both Policy SCLP 12.3 and 12.26 detail garden neighbourhood developments that follow the principles of garden settlements.

The Sustainability Appraisal has been undertaken in accordance with legislative requirements.

Marine based designations are appropriately recognised in the supporting text of the Biodiversity & Geodiversity section.

Policy SCLP 10.3 details landscape requirements for development proposals.

Enforcement action will be taken, when possible, against any planning related activities that are not in accordance with Local Plan policies.

Under Policy SCLP 10.1 brownfield sites registered on the Brownfield Sites Register will be considered favourably for development, in order to lessen the likelihood of environmental net loss from development and to increase the likelihood of environmental net gain.

At the planning application stage it is expected that more detailed evidence base assessments will be carried out to inform development proposals.

## Other

### **Q142: Do you have any other comments on how current Local Plan policies are working and whether they need to be amended? (33 responses)**

Due to the nature of this question, the responses cover a range of issues but it is clear that any policy creation must have been well thought through with the comments from the public being influential.

There is concern regarding how policies affect new developments. The responses suggest that: policy does not ensure that developments are built in a timely manner after receiving planning permission; Policies and communities were said to not be considered enough during the early stages of planning permission and Local Plan policies need to be in conjunction with Neighbourhood Plans.

There were some mixed opinions on the current Local Plan policies, with some individual Parishes reacting positively and others negatively. Some suggestions for the current policies included: building on brownfield sites to conserve the countryside, adopting policies to prevent out of town shopping developments being located too close to town centres and changing the policies as they appear to form a framework against which to tick boxes of compliance without true in-depth knowledge of the consequences of development.

Another key point that is referenced in multiple responses is the importance of reviewing the plan after its adoption. It is felt that facilities will change in areas and this must be updated in the plan when trying to structure development against facility coverage. The 5 year land supply must also be adhered to on an ongoing basis to prevent the Local Plan from becoming out of date. This is especially important as it was mentioned a government inspector had labelled the current Local Plan to be out of date.

Furthermore, there is considerable concern towards the impacts of poorly planned development and how these developments can affect the surrounding area. Comments regarded the lack of input from the younger generation, lack of time and resources planning officers have to consider applications effectively and local objectors not having enough influence being the main issues. Comments also referred to sites being submitted that didn't reflect the current policies that are successful. In consequence, poorly planned development could have impacts on the surrounding area which will need managing. Examples of these impacts include: dangerous roadside parking which will only increase with the influx of vehicles; settlements being allocated more houses than their fair share and homes being built in the wrong places, creating unbalanced communities in terms of age demographic. However, there is concern that a lack of development could result in an ageing population, placing different demands on leisure, community and health facilities that need to be catered for.

There are also a number of comments that referred to points relating to wildlife and quality of life and its importance over economic gains. There is a view that increased emphasis on biodiversity would be welcomed in the new Local Plan. It was also recommended that site allocations should be clearer as to the requirement for Habitats Regulations Assessment.

Comments also came forward in response to how we can improve the Local Plan document. Suggestions for the document included providing information in more manageable chunks over a longer period of time, including a glossary at the back and to improve the online consultation system so that it felt less cumbersome. There was also a suggestion to add more details to the maps with AONB, SLA, Greenbelt and other areas indicated on the maps as well as providing an updated performance summary to measure what has been developed against the targets set out in the document. Suggestions also came forward for the rewording of some policies regarding Sizewell A decommissioning, Policies SP18, DM23 and DM24.

Finally, there were some general comments regarding issues that respondents felt needed addressing. These included:

- Direct notification regarding Local Plan to all houses
- The councils approach needs to be more supportive to create more good jobs and houses
- Need to recognise inward migration from London and elsewhere to allow for local needs

*How these comments have been taken into account in the First Draft Local Plan:*

The First Draft Plan includes a comprehensive set of policies, based on evidence and consultation responses to a variety of issues. Many of the issues raised are outside of the Council's remit (such as government approach to land supply or the delivery rate of developments) but those which have been highlighted for inclusion with in the Local Plan have.

Consultation responses have highlighted the need to create balanced communities, with provision of residential opportunities for local people and to support the ageing population. The First Draft Plan

seeks to create healthy, viable and successful communities across the District with appropriate residential provision for all sectors of the population.

The First Draft Plan is based on a robust and credible evidence base which provides guidance in respect of landscape character, employment land and traffic modelling. All policies within the First Draft Plan are informed by public consultation responses where relevant.

The First Draft Plan will include a glossary of key terms and phrases to aid understanding of the document and will be supported by detailed policies maps for settlements. These Policies Maps will provide the geographical representation of the written document and will include a variety of designations which will impact upon land use.

## Summaries of comments received in relation to sites (in Parish order)

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
223	Land at Crag Pitt Nurseries, Leiston Road	Housing	Aldeburgh	RSPB	Raise concerns about development on this site and proximity to sites with European designations. Any proposals will require an HRA to demonstrate these sites can be brought forward without adverse effect on designated sites.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as a result of the cumulative impacts of the constraints. These include; the SSSI on the site and bordering the site to the East, within the AONB and Heritage Coast, and subject to Surface Water Flooding and within FZ2.
223	Land at Crag Pitt Nurseries, Leiston Road	Housing	Aldeburgh	Suffolk Wildlife Trust	Further assessment required to determine whether development is likely to have an adverse impact on designated sites.	
223	Land at Crag Pitt Nurseries, Leiston Road	Housing	Aldeburgh	SCC Highways	Improved pedestrian/cycle links into town centre required.	
377	land to the north	Housing	Aldeburgh	SCC	Significant length of	Comment noted

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	of Pinehurst, Leiston Road			Highways	footway required on Leiston Road.	however the site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
378	land west of Marsh House, Saxmundham Road	Housing	Aldeburgh	Suffolk Wildlife Trust	Further assessment required to determine whether development is likely to have an adverse impact on designated sites.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
402	Land to the west of Hall Farm Lane	Housing and Open space	Aldeburgh	RSPB	Raise concerns about development on this site and proximity to sites with	Consistent with the comments made, the site has not been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					European designations. Any proposals will require an HRA to demonstrate these sites can be brought forward without adverse effect on designated sites.	identified as a preferred site due to its proximity to a SSSI to the north west, as well as flooding resulting from the site being situated in FZ3a and FZ2.
414	Former Reades Brickworks, Saxmundham Road	Housing	Aldeburgh	Suffolk Wildlife Trust	Site has features of ecological value as identified in a previously submitted planning application	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment for a number of reasons, the principal of which is due to a SSSI in the Northern corner of the site.
414	Former Reades Brickworks, Saxmundham Road	Housing	Aldeburgh	SCC Highways	Access to Saxmundham Road would require footways.	Comment noted however site has not been identified as suitable for a number of reasons.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
414	Former Reades Brickworks, Saxmundham Road	Housing	Aldeburgh	Aldeburgh Town Council	Unsuitable for housing. Should be restored to nature.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment for a number of reasons, the principal of which is due to a SSSI in the Northern corner of the site.
530	The Old Police Station site and land to the East off Leiston Road	Housing	Aldeburgh	Aldeburgh Town Council	Planning application currently being finalised	Site has not been assessed as it has planning permission.
640	Land between Roos and Saxmundham Road	Housing	Aldeburgh	Aldeburgh Town Council	Conditional support for development of a maximum of 3 houses	Comment noted. Site not proposed for allocation due to various issues and there is no need to allocate land in Aldeburgh above the existing allocation, to meet the strategy of this

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Local Plan. Sites may come forward during the plan period within the Settlement Boundary.
641	Land to the rear 70 Saxmundham Road	Housing	Aldeburgh	Aldeburgh Town Council	Conditional support for a maximum of 2 houses	Comments noted however site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
642	Land adjacent to 1 Crescent Road	Housing	Aldeburgh	Aldeburgh Town Council	Conditional support for development in the long term, densities would need to reflect historic environment.	Conditional support for development in the long term, densities would need to reflect historic environment.
904	Land at Aldeburgh Golf Course, off Golf Lane	Housing	Aldeburgh	Suffolk Wildlife Trust	Development would result in the loss of a County Wildlife Site.	The site has been identified as not available in the Draft Strategic Housing and Economic Land Availability Assessment.
966	Land at	Housing	Aldeburgh	Aldeburgh	Support	Noted, however site is

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Fenlands, Leiston Road			Town Council		identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment as not within, adjoining or well related to the form of the settlement.
997	Land adjacent to 187 Saxmundham Road, Aldeburgh	Housing	Aldeburgh	Suffolk Wildlife Trust	Development would result in the loss of a County Wildlife Site.	Consistent with the comments made, the site has not been identified as a preferred site including due to potential impacts on biodiversity.
997	Land adjacent to 187 Saxmundham Road	Housing	Aldeburgh	Aldeburgh Town Council	Conditionally support, for a maximum of 3 houses.	Comments noted however the site is not a preferred site. The site is a small site and there are other opportunities within the settlement boundary for small sites to come forward.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1066	Land adjacent to Leiston Road and The Drift	Housing	Aldeburgh	Aldeburgh Town Council	The site has good access and is well located. Would also be useful for a park and ride location in addition to housing.	Comments noted however site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
855	Land North of Ramsholt Road, IP12 3AQ	Housing	Alderton	The Bawdsey Estate	Site promoted by landowner for residential use.	The comments are noted however the strategy for the Local Plan is not reliant upon growth in Alderton, in particular given the access constraints on the site, it is considered that there are more suitable sites elsewhere in the District. The site is therefore not selected as a preferred site for allocation.
855	Land North of Ramsholt Road, IP12 3AQ	Housing	Alderton	Alderton Parish Council	No objection to this site being considered for development.	
412	land south of Aldringham Lane	Housing	Aldringham	Private individual	Particular development is inappropriate and misplaced, village has	The site has been identified as not suitable through the Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					already done its bit for housing numbers across the District.	Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
412	land south of Aldringham Lane	Housing	Aldringham	SCC Highways	Footway upgrade required on Aldringham Lane.	Highways comment noted, however site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
412	Land south of Aldringham Lane	Housing	Aldringham	Private Individual	Not appropriate due to lack of community facilities and loss of village identity	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land
412	Land south of Aldringham Lane	Housing	Aldringham	Aldringham cum Thorpe	Site previously discounted due to being disconnected	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Parish Council	from village, half a mile from physical limits, intrudes into SLA and impact on Listed Building.	Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
412	Land south of Aldringham Lane	Housing	Aldringham	Private Individual	The proposal is too many for a small village, there are few employment opportunities locally.	
412	Land south of Aldringham Lane	Housing	Aldringham	Private Individual	Not appropriate due to lack of community facilities	
981	Land off Aldringham Road	Housing	Aldringham	Aldringham cum Thorpe Parish Council	Previously discounted due to being remote from services, intrusion into SSSI and SPA, in AONB, in Heritage Coast, outside physical limits, impacts on Conservation Area and Listed Building.	Draft Strategic Housing and Economic Land Availability Assessment identifies that western part of site within the SPA is not suitable for development. The Local Plan notes the Neighbourhood Plan as being the mechanism for identifying allocations.
981	Land off Aldringham	Housing	Aldringham	Thorpeness and	Land promoted for development.	Part of site potentially suitable, however the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road			Aldeburgh Hotels Ltd / Private Individual		Local Plan notes the Neighbourhood Plan as being the mechanism for identifying allocations.
94	Land at The White Horse and Badingham House, Low Road	Not specified	Badingham	Private individual	The area proposed would not be acceptable due to a) the land forms part of the flood plain, b) the area is within a Designated Special Landscape Area, c) there is a need for tree and wildlife preservation, d) road safety issues.	The site has been identified as not available in the Draft Strategic Housing and Economic Land Availability Assessment.
94	Land at The White Horse and Badingham House, Low Road	Not specified	Badingham	Badingham Parish Council	Site is an iconic and beautiful gateway to Badingham with historic woodland that needs to be retained. Development on this site would have a detrimental effect on character of the area.	
94	Land at The White Horse and	Not specified	Badingham	Suffolk Wildlife	Site would need further assessment to consider if	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Badingham House, Low Road			Trust	development would have a significant adverse impact on habitats.	
94	Land at The White Horse and Badingham House, Low Road	Not specified	Badingham	Evolution Town Planning	Site is currently woodland and impact on listed buildings is an issue.	
94	Land at The White Horse and Badingham House, Low Road	Not specified	Badingham	Private individual	Must not destroy character of the village but need to provide lower cost housing and shared ownership within the village.	
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Private individual	Land is a natural meadow County Wildlife Site and should be treasured and retained in its present form.	The site has been identified as not available in the Draft Strategic Housing and Economic Land Availability Assessment.
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Suffolk Wildlife Trust	Development would result in the loss of a County Wildlife Site.	
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Evolution Town Planning	Development would be to the rear of existing properties and access may	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					be difficult.	
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Private individual	Development would result in the loss of a County Wildlife Site.	
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Private individual	Plot is important for wildlife and the environment and should be retained.	
164	Land to the rear of 1 - 2 Old Rectory Road	Housing	Badingham	Private individual	Development would result in the loss of a County Wildlife Site.	
230	Land at and north of New Lea	Housing	Badingham	Evolution Town Planning	Site is a pocket park and would not propose redevelopment of this site.	The site has been identified as not suitable through the Draft
230	Land at and north of New Lea	Housing	Badingham	Badingham Parish Council	Site is a pocket park and provides open green space, it should remain as such.	Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
238	Land south of Lapwing Barn, Low Street	Housing	Badingham	Landowner	Site withdrawn	The site has been identified as not available in the Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
238	Land south of Lapwing Barn, Low Street	Housing	Badingham	Evolution Town Planning	Future deliverability should be in doubt.	Strategic Housing and Economic Land Availability Assessment.
238	Land south of Lapwing Barn, Low Street	Housing	Badingham	Badingham Parish Council	Site is within flood meadow and flood zone and is unsuitable for development.	
503	Land off Mill Road, Badingham	Housing	Badingham	Private individual	Provide valuable wildlife habitats which is part of the Special Landscape Area.	The site has not been identified as a preferred site as the Local Plan strategy is not reliant upon allocating in Badingham and due to potential access issues it is considered that there are more suitable sites elsewhere in the District.
503	Land off Mill Road, Badingham	Housing	Badingham	Evolution Town Planning	Site promoted by landowner for residential use.	
503	Land off Mill Road, Badingham	Housing	Badingham	Badingham Parish Council	Site is unsuitable as it would create unacceptable density of housing in conjunction with those that already exist.	
503	Land off Mill Road, Badingham	Housing	Badingham	Private individual	Must not destroy character of the village but need to provide lower cost housing and shared ownership within the village.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
678	Bowling Green Farmyard, Pound Green Road, Badingham	Housing	Badingham	Private individual	Any development of this site to be concentrated only to the unused farm buildings. Important that the countryside remains green and not urbanised otherwise village will lose its individuality, character and beauty.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
678	Bowling Green Farmyard, Pound Green Road, Badingham	Housing	Badingham	Badnham Parish Council	Previously developed land with close proximity to A1120. Suitable for sympathetic low impact business/office units alongside residential use.	
678	Bowling Green Farmyard, Pound Green Road, Badingham	Housing	Badingham	Private individual	Must not destroy character of the village but need to provide lower cost housing and shared ownership within the village.	
678	Bowling Green Farmyard, Pound Green	Housing	Badingham	Private individual	Site is well outside physical limits of Badingham and would represent a totally	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Badingham				inappropriate development in the countryside.	
872	Land to the rear of 4 Low Street	Housing	Badingham	Private individual	Greenfield site not acceptable due to impact on Special Landscape Area, natural environment, drainage in the village and road safety issues.	Comments are noted however the site is identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment.
872	Land to the rear of 4 Low Street	Housing	Badingham	Badingham Parish Council	Unsuitable site due to poor road access and within setting of the Grade 1 listed church.	
872	Land to the rear of 4 Low Street	Housing	Badingham	Private individual	Must not destroy character of the village but need to provide lower cost housing and shared ownership within the village.	
872	Land to the rear of 4 Low Street	Housing	Badingham	Evolution Town Planning	Development on this site would dominate existing dwellings and issues raised in respect of highway safety and access.	
872	Land to the rear	Housing	Badingham	Private	Inadequate road	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	of 4 Low Street			individual	infrastructure for development on this site.	
1057	Land North of the Old Rectory, Badingham	Housing	Badingham	Private individual	Provide valuable wildlife habitats which is part of the Special Landscape Area	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
1057	Land North of the Old Rectory, Badingham	Housing	Badingham	Badingham Parish Council	Site unsuitable as no access is available.	
1057	Land North of the Old Rectory, Badingham	Housing	Badingham	Evolution Town Planning	Site rear of the pocket park and not clear how access would be achieved.	
455	Land fronting The Street, Bawdsey	Housing	Bawdsey	Bawdsey Parish Council	May be potential in this site providing development is kept in scale with existing housing stock and layout.	The comments are noted however the site has not been identified as a preferred site as strategy for the Local Plan is for limited growth in the Bawdsey peninsula area and it is considered that there are more suitable sites elsewhere when

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						considering the issues to be addressed including access and landscape impact.
536	Land to East of Holly Lodge	Housing	Bawdsey	Bawdsey Parish Council	A large site not connected in any way to the village community and cannot conceive that development is acceptable on this site.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
1035	Land adj. Saxon Lodge, The Street, Bawdsey	Housing	Bawdsey	Bawdsey Parish Council	Site not suitable for development, its position in relation to other buildings make it totally unsuitable.	The comments are noted. The site has not been identified as a preferred site as
1035	Land adj. Saxon Lodge, The Street, Bawdsey	Housing	Bawdsey	Private individual	Site forms part of the garden to 12 East Lane.	strategy for the Local Plan is for limited growth in the Bawdsey peninsula area and it is considered that there

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						are more suitable sites elsewhere when considering the issues to be addressed including access and landscape impact.
247	Land rear of The Limes, Main Road	Housing	Benhall	Benhall & Sternfield Parish Council	Support is subject to appropriate highway measures on School Lane.	Support for the site noted. However, the site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.
247	Land rear of The Limes, Main Road	Housing	Benhall	Private Individual	Support	Noted however site is below size threshold for consideration for allocation.
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Benhall & Sternfield Parish Council	Support in part – development should not extend eastwards past Forge Close. Support is conditional upon remaining part of the plat becoming a	The comments have been considered in assessing potential site allocations. Benhall is identified as a small village in the settlement

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					protected landscape to minimise impact on existing village.	hierarchy and has some potential for growth due to proximity to the A12.
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Some extension of the development already approved seems inevitable but don't extend too far. Prime farming land and the roads cannot tolerate too much more traffic.	Part development of the site is proposed. The policy includes criteria related to landscaping and open space. Requirements in relation to provision of
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Site would represent very poor or inappropriate future development. The site is challenged and would not deliver a properly sustainable plan and would have a detrimental impact on ecology, wildlife, noise and light pollution in the rural areas.	additional spaces are included. Issues related to noise and light pollution would be addressed at the planning application stage through policy SCLP11.2 Residential Amenity. The Infrastructure Delivery
493	Land South of Forge Close between Main	Housing and Open space	Benhall	<b>Petition signed by 32</b>	Register strongest objection because of loss of agricultural land, flooding	Framework outlines the delivery of necessary infrastructure to support

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road and Ayden			individuals	issues, lack of infrastructure near the school to cope with increase in traffic, school capacity at saturation point, any further development would destroy the identity of Benhall Green.	the development. Comments from SCC highways have been addressed through the policy.
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Strongly oppose such development as it would irredeemably change nature of the village and overstretch existing amenities. Benhall needs a proportion of affordable homes suitable for young couple and older residents which would retain the present character of the village.	
493	Land South of Forge Close between Main	Housing and Open space	Benhall	Private individual	Totally disagree with proposed development, would destroy the beautiful	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road and Ayden				village.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Wholeheartedly disagree with proposed development, it would be detrimental to peace and tranquillity of the village.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Site should be discounted as it would spoil the village, impacts on a large number of people and need to retain our lovely village in the present state	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Any development outside of the village envelope will be detrimental to the environment.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Opposed to further development as it will have a large impact on residents. Benhall should retain its own identity	
493	Land South of Forge Close	Housing and Open space	Benhall	Private individual	Benhall Green does not have the necessary	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	between Main Road and Ayden				infrastructure to sustain more houses and an increased population.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	Site outside of the physical limit. Imposition of houses would totally destroy rural nature of Benhall as there is already a huge problem with infrastructure in the area.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	Private individual	This plot is the only one that would allow natural spread of the village to maintain its identity and not create sprawl.	
493	Land South of Forge Close between Main Road and Ayden	Housing and Open space	Benhall	SCC Highways	Footway along frontage and crossing point to continuous footway on opposite side required.	
493	Land South of Forge Close between Main Road and Ayden	Housing	Benhall	Private Individual	Support provided development does not extend eastwards further than site south of Forge	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Close.	
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Historic England	Development to the south of Saxmundham would alter the character of the town and the distinction between town and countryside, and impact on views out of the Conservation Area.	Comments noted. Site 494 not proposed for allocation.
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Benhall and Sternfield Parish Council	OPPOSE. Any development of these sites would intrude into the open country side between Benhall and Saxmundham, and contribute to the loss of village identity.	Comments regarding coalescence between Saxmundham and Benhall have been noted and have been important considerations throughout the site selection process and when looking at alternative options for the development of a Garden Neighbourhood. The site is therefore not
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					determine whether development in this location is likely to result in any adverse ecological impacts.	identified as a preferred site for allocation.
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Private individual	We are most concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Consider that open farmland must be preserved between Benhall and Saxmundham.	
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Private individual	We oppose development which would result in the loss of Benhall' s essential character as a village community, making it effectively a suburb of Saxmundham	
494	Land fronting	Housing	Benhall	Private	Some building here may be	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Main Road between Grays Lane and Kiln Lane			individual	inevitable but please leave some countryside between Sax' and Benhall Green	
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Private individual	If these were to be developed in total, or even in part, the identity of Benhall as a village would be totally destroyed. It would be completely enveloped in a sprawling, unsustainable housing estate that would stretch from Saxmundham out to the A12	
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	Private individual	Site 494 is within the boundary of Benhall, has excellent road access and does not impact many people directly and should therefore be considered for small scale expansion.	
494	Land fronting	Housing	Benhall	Private	Development on this site	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Main Road between Grays Lane and Kiln Lane			individual	would mean ribbon development out of the town to swallow up Benhall Green and Sternfield too. This would be at the expense of the landscape and the villages identity	
494	Land fronting Main Road between Grays Lane and Kiln Lane	Housing	Benhall	SCC Highways	Potential impact upon Church Street signalised junction. Detailed analysis and potential mitigation required. Footway widening required on Main Rd. Assess in conjunction with adjacent sites.	
507	Land opposite Sunnyside, School Lane	Housing	Benhall	Private Individual	Support	Noted however site has been discounted as it is not within, adjoining or well related to the form of the settlement.
507	Land opposite Sunnyside, School Lane,	Housing	Benhall	Benhall and Sternfield Parish	Support is subject to appropriate highway measures along School	The site has been discounted as it is not within, adjoining or well

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	IP17 1HE			Council	Lane.	related to the form of the settlement.
507	Land opposite Sunnyside, School Lane, IP17 1HE	Housing	Benhall	SCC Highways	School Lane is totally unsuitable for access to any new housing. Site is outside of the physical limits boundary and does not conform with any Local Plan requirements.	
687	Land at Friday Street Farm, Adjoining the A12. IP17 1JU	Housing	Benhall	Benhall and Sternfield Parish Council	These sites are remote from the village, and would constitute intrusion into open countryside.	The site has been discounted as it is not within, adjoining or well related to the form of the settlement.
687	Land at Friday Street Farm, Adjoining the A12. IP17 1JU	Housing	Benhall	Private individual	We are most concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Consider that open farmland must be preserved between Benhall and Saxmundham.	
687	Land at Friday	Housing	Benhall	SCC	Remote from local	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Street Farm, Adjoining the A12. IP17 1JU			Highways	amenities. Adjacent to junction with history of injury accidents.	
688	Land at Friday Street Farm, Rose Hill, Friday Street, IP17 1JU	Housing	Benhall	Benhall and Sternfield Parish Council	These sites are remote from the village, and would constitute intrusion into open countryside.	The site has been discounted as it is not within, adjoining or well related to the form of the settlement.
688	Land at Friday Street Farm, Rose Hill, Friday Street, IP17 1JU	Housing	Benhall	Private individual	We are most concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Consider that open farmland must be preserved between Benhall and Saxmundham.	
715	Land South of Saxmundham	Housing	Benhall	Historic England	Development to the south of Saxmundham would alter the character of the town and the distinction between town and countryside, and impact on	Comments noted. Site 715 not proposed for allocation.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					views out of the Conservation Area.	
715	Land South of Saxmundham	Housing, open space	Benhall	Benhall and Sternfield Parish Council	OPPOSE. Any development of these sites would intrude into the open country side between Benhall and Saxmundham, and contribute to the loss of village identity.	Comments regarding coalescence between Saxmundham and Benhall have been noted and have been important considerations throughout the site selection process and when looking at alternative options for the development of a Garden Neighbourhood. The site is therefore not identified as a preferred site for allocation.
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	We are most concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Consider that open farmland must be preserved between Benhall and Saxmundham.	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	I believe parts of plots 715 and 494 might be a better alternative and affect fewer residents	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
715	Land South of Saxmundham	Housing, open space	Benhall	Pigeon Investment Management Ltd	Site promoted by landowner for residential use.	
715	Land South of Saxmundham	Housing, open space	Benhall	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	We oppose development which would result in the loss of Benhall' s essential character as a village community, making it effectively a suburb of Saxmundham.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	Some building here may be inevitable but please leave some countryside between Sax' and Benhall Green	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	Inappropriate as unsuitable ribbon developments and link up Saxmundham with existing settlement of Benhall.	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	If these were to be developed in total, or even in part, the identity of Benhall as a village would be totally destroyed. It would be completely enveloped in a sprawling, unsustainable housing estate that would stretch from Saxmundham out to the A12	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	Suggested plots would mean ribbon development out of the town to swallow	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					up Benhall Green and Sternfield too.	
715	Land South of Saxmundham	Housing, open space	Benhall	Private individual	We believe the potential for development of these areas to be ill considered and represent very poor or in appropriate future development for the reasons given above.	
715	Land South of Saxmundham	Housing, open space	Benhall	SCC Highways	Links to east and north of site required - with adjacent site 714. Potential impact upon Church Street signalised junction. Detailed analysis and potential mitigation required. Assess in conjunction with adjacent sites	
716	Land South of Saxmundham	Employment, open space	Benhall	Benhall and Sternfield Parish Council	OPPOSE. Any development west of the A12 is opposed as being remote from existing development, and	The site has not been identified as a preferred sites for employment as incorporating

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sets an undesirable precedence.	employment land within the South Saxmundham
716	Land South of Saxmundham	Employment, open space	Benhall	Private individual	We are most concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Consider that open farmland must be preserved between Benhall and Saxmundham.	Garden Neighbourhood is considered to provide more benefits in terms of linking with new housing and the town centre.
716	Land South of Saxmundham	Employment, open space	Benhall	Pigeon Investment Management Ltd	Site promoted by landowner for a master plan development.	
716	Land South of Saxmundham	Employment, open space	Benhall	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					determine whether development in this location is likely to result in any adverse ecological impacts.	
716	Land South of Saxmundham	Employment, open space	Benhall	Saxmundham Town Council	Strong concerns about accepting development to the west of the A12.	
716	Land South of Saxmundham	Employment, open space	Benhall	Private individual	We believe the potential for development of these areas to be ill considered and represent very poor or in appropriate future development for the reasons given above	
716	Land South of Saxmundham	Employment, open space	Benhall	Private individual	716 inappropriate as unconnected to existing development and will require new access road to major highway.	
716	Land South of Saxmundham	Employment, open space	Benhall	SCC Highways	Access via A12. Potentially significant investment to provide suitable junction	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					layout. Assess in conjunction with adjacent sites.	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private Individual	Support provided development does not extend eastwards further than site south of Forge Close.	Considering the allocation of site 493 and the scale of development South of Saxmundham, the site has been discounted as it would be inappropriate to allocate further development in the settlement within this Local Plan.
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Benhall and Sternfield Parish Council	OPPOSE. Development of this plot would be 'out of scale' and inconsistent with preserving the character of the village.	Considering the allocation of site 493 and the scale of development South of Saxmundham, the site
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Some extension of the small development already approved seems inevitable, but please don't extend too	has been discounted as it would be inappropriate to allocate further development in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					far.	the settlement within this Local Plan.
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual and petition signed by 32 individuals	Register strongest possible objection because site is earmarked as greenfield and essential for agriculture. Risk of flooding, traffic and highway safety, school capacity and destroying the identity of Benhall	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	We would oppose such intense development on these two sites as being well beyond the needs of the existing population in the foreseeable future and therefore likely to attract a considerable proportion of second-home owners and holiday lets. This would irredeemably change the nature of the village and would overstretch existing	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					amenities	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	I totally disagree with this planning not only will it destroy a beautiful village and my house backs into site 751 and this would make live unbearable we have view of fields and enjoy the wildlife and quiet and this would be affected if buildings were built at the back not only this it would affect my quality of life as well as affect the wild life.	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Site is behind my house and have enjoyed peace and tranquillity for a long period with lovely views across the fields. I sincerely hope this does not go ahead.	
751	Land behind Herons Way and Meadow Walk,	Housing	Benhall	Private individual	Should be discounted because it is a small piece of land that has already	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Festival Close				been overturned for development, impacts a large number of people	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Site is outside the village envelope. In preparation of a new Local Plan I would hope the District council remembers that Benhall is classified as a village and the overall additional housing requirements under the current Local Plan were deemed to be "minimal".	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Opposed to further development as this will have a large impact on a great number of residents.	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Development would adversely affect the aesthetics and character of the village.	
751	Land behind	Housing	Benhall	Private	These sites are both outside	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Herons Way and Meadow Walk, Festival Close			individual	the physical limit and therefore in countryside. In addition to conflicting with many of the criteria for development in the Local Plan, the principal concern, if both these plots were to be built on, would be one of scale. The imposition of hundreds of houses here would totally destroy the rural nature of Benhall and its status as a village.	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	Private individual	Development on this site would have the biggest impact on the largest number of people of all of the development sites proposed in Benhall. Consideration should be given to other sites that do not cause such an impact on peoples lives. People	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					choose to live in Benhall due to it's rural nature and 'village appeal' - building to any extent will change that forever	
751	Land behind Herons Way and Meadow Walk, Festival Close	Housing	Benhall	SCC Highways	Connection to B1121 via site 493 required.	
817	Land adj to Alder Close, Aldecar lane	Housing	Benhall	Private Individual	Support	Noted however site is below size threshold for consideration for allocation
817	Land adj to Alder Close, Aldecar lane	Housing	Benhall	Benhall & Sternfield Parish Council	SUPPORT. 818 is within the current village envelope, and 817 is well related to it.	The site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.
817	Land adj to Alder Close, Aldecar lane	Housing	Benhall	Private individual	As the landowners, would like to propose the site for self build units and offered to local people on the self build register in the first instance.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
817	Land adj to Alder Close, Aldecar lane	Housing	Benhall	Private individual	Site is an established house and I do not understand why it is listed as land proposed for development.	
818	Land at Lime Barn, Aldecar Lane	Housing	Benhall	Private Individual	Support	Noted however site is below size threshold for consideration for allocation.
818	Land at Lime Barn, Aldecar Lane	Housing	Benhall	Benhall & Sternfield Parish Council	SUPPORT. 818 is within the current village envelope, and 817 is well related to it.	The site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.
818	Land at Lime Barn, Aldecar Lane	Housing	Benhall	Private individual	As the owners of the land we wish to remove this site from the Local Plan process.	
818	Land at Lime Barn, Aldecar Lane	Housing	Benhall	Private individual	Site is outside of the physical limit and therefore countryside. Development on this site would further contribute to the urbanisation of this part of the village.	
819	Land adj to Ella	Housing	Benhall	Benhall &	OPPOSE. Development of	The site has been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	House, Aldecar Lane			Sternfield Parish Council	these sites would constitute unacceptable intrusion into Special Landscape Areas.	discounted, the primary issue being impact on the sensitive landscape.
819	Land adj to Ella House, Aldecar Lane	Housing	Benhall	Private individual	As the landowners, would like to propose the site for self build units and offered to local people on the self build register in the first instance.	
819	Land adj to Ella House, Aldecar Lane	Housing	Benhall	Private individual	Permission for housing development has been denied multiple times for this site in the last few years and none of the criteria that led to these decisions has changed.	
819	Land adj to Ella House, Aldecar Lane	Housing	Benhall	Private individual	This plot has had applications to develop submitted five times in as many years. All have been refused, including by the Secretary of State	
820	Land at	Housing	Benhall	Benhall &	OPPOSE. Development of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Woodlands, Aldecar Lane			Sternfield Parish Council	these sites would constitute unacceptable intrusion into Special Landscape Areas.	discounted as it is not within, adjoining or well related to a settlement.
820	Land at Woodlands, Aldecar Lane	Housing	Benhall	Private individual	As the landowners, would like to propose the site for self build units and offered to local people on the self build register in the first instance.	
820	Land at Woodlands, Aldecar Lane	Housing	Benhall	Private individual	Virtually all the concerns that lead to the refusal of Planning Permission on 819 would also apply to this plot and on this basis; it too should be removed from the list of proposed sites.	
820	Land at Woodlands, Aldecar Lane	Housing	Benhall	Private individual	Narrow single track dead-end road access. Unsuitable for development and lies outside of the village boundary. Expect significant objections and a real fight should a proposal	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					to develop be entertained on these plots.	
137	Land surrounding area of the Old Post Office, Old Post Office Lane	physical limits retention (area to be protected from development)	Blaxhall	Evolution Town Planning	Site should remain undeveloped small holdings.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.  The site has been submitted as an area to be protected from development and therefore, has not been considered as a potential site allocation.
163	Land north of Ship Corner, opposite Rose Cottage	Not specified	Blaxhall	Blaxhall Parish Council	Parish Council in favour of development on this site, after 650 and 729.	Comments noted. Blaxhall is identified as being in the countryside in the settlement

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						hierarchy and therefore no sites are proposed for allocation.
163	Land north of Ship Corner, opposite Rose Cottage	Not specified	Blaxhall	Blaxhall Parish Council	Parish Council cautiously in favour of 1-2 properties being developed on this site but need to ensure style is in keeping with neighbouring properties.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.  The site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.
163	Land north of Ship Corner, opposite Rose Cottage	Not specified	Blaxhall	Blaxhall Commons and Open Spaces Charitable Trust	Site is currently used as a paddock and access would require approval of Secretary of State and would be opposed by Trust as encroachment of common land. Site is also subject to localised flash flooding.	
163	Land north of Ship Corner, opposite Rose Cottage	Not specified	Blaxhall	Private individual	Access to the site is across common land which is not possible to overcome. Most of the common in Blaxhall has been registered	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					as an Asset of Community Value, has poor road access and is subject to localised flooding.	
163	Land north of Ship Corner, opposite Rose Cottage	Not specified	Blaxhall	Private individual	Opposed development on this site, land can only be reached by crossing common land and access would in my view be dangerous.	
427	Land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Most appropriate land for development – it is in the heart of the village and surrounded by other houses.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.
427	land south of Old Post Office Lane	Housing	Blaxhall	Blaxhall Parish Council	Parish Council strongly opposed to any development on the existing allotment sites.	Comments related to the allotments are noted and the site is identified as potentially suitable

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
427	land south of Old Post Office Lane	Housing	Blaxhall	Blaxhall Commons and Open Spaces Charitable Trust	The Trust is strongly opposed to any development on the existing allotment sites. Development here would cause substantial harm to local distinctiveness.	following the SHELAA methodology only if alternative allotment space was available. Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Removal of the allotments would be a great loss to the village. Allotments represent a green space at the heart of the village and they should be retained.	
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	If site is developed where would the replacement allotments be?	
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Opposed to building on this site, would irrevocably change the nature of village.	
427	land south of Old Post Office Lane	Housing	Blaxhall	Evolution Town Planning	Site is an area to be protected from development and therefore	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					not available.	
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Crossroads prone to flooding, little infrastructure in the village. Number of second homes in the village is detrimental and this should be tackled before more development takes place.	
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Occupants of any new houses would have no employment opportunities in the village, no bus services, no shops, heavily dependent on motor car.	
427	land south of Old Post Office Lane	Housing	Blaxhall	Private individual	Proposal would greatly harm the character and setting of the village.	
649	Station Road Blaxhall	Housing	Blaxhall	Blaxhall Parish Council	Strongly opposed to any development on this site.	The comments are noted and the site identified as unsuitable in Draft SHELAA – site is not within, adjoining,
649	Station Road Blaxhall	Housing	Blaxhall	Blaxhall Commons	The Trust is strongly opposed to any	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				and Open Spaces Charitable Trust	development on the existing allotment sites. Development here would cause substantial harm to local distinctiveness	adjacent or well related to the form of the settlement
649	Station Road Blaxhall	Housing	Blaxhall	Private individual	Open farmland which causes flooding on the roads due to elevation	
649	Station Road Blaxhall	Housing	Blaxhall	Private individual	Building on this site would devastate the views of Mill Common and exacerbate the risk of flooding.	
649	Station Road Blaxhall	Housing	Blaxhall	Evolution Town Planning	Site promoted by landowner for residential use.	
649	Station Road Blaxhall	Housing	Blaxhall	Private individual	Greenfield site outside of development boundary. Any development in this location would result in substantial harm to local character and distinctiveness.	
649	Station Road	Housing	Blaxhall	Private	Any development along this	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Blaxhall			individual	road would be extremely intrusive.	
649	Station Road Blaxhall	Housing	Blaxhall	Private individual	Crossroads prone to flooding, little infrastructure in the village. Number of second homes in the village is detrimental and this should be tackled before more development takes place.	
649	Station Road Blaxhall	Housing	Blaxhall	Private individual	Development here would conflict with existing character of the village and landscape.	
650	Mill Common Blaxhall	Housing	Blaxhall	Blaxhall Parish Council	Parish Council in favour of development on this site.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
650	Mill Common Blaxhall	Housing	Blaxhall	Blaxhall Parish Council	In favour of the site providing the number of homes is scaled back to 2-3 properties.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites.
650	Mill Common Blaxhall	Housing	Blaxhall	Blaxhall Commons and Open Spaces Charitable Trust	Concern that development would set a precedent for ribbon development, with poor access and detrimental impact on setting of Mill Common. Site assessments fail to recognise proximity of the site to the SPA and other environmental designations.	
650	Mill Common Blaxhall	Housing	Blaxhall	Private individual	Roads are inadequate and would become dangerous for increased traffic that would result from extra housing.	
650	Mill Common Blaxhall	Housing	Blaxhall	Private individual	Support very limited development on the Snape Road	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
650	Mill Common Blaxhall	Housing	Blaxhall	Evolution Town Planning	Site promoted by landowner for residential use.	
650	Mill Common Blaxhall	Housing	Blaxhall	Private individual	Least destructive of proposed sites is this one. Careful thought would need to be given to how and where vehicles would access the site.	
650	Mill Common Blaxhall	Housing	Blaxhall	Private individual	Prominent site which would take housing closer to Blaxhall Common. Any future incremental development would have a greater detrimental impact on the setting of the Common.	
729	Blaxhall Hall, Little Glenham	Housing	Blaxhall	Blaxhall Parish Council	Parish Council in favour of development on this site.	Comments noted however Blaxhall is identified as being in the countryside in the settlement hierarchy and therefore no sites

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						are proposed for allocation.
1090	Longfield Nursery, Rectory Road, Stone Common, Blaxhall	Housing	Blaxhall	Blaxhall Parish Council	Parish Council strongly opposes any development on this site.	Blaxhall has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate sites. Further, the site is identified as unavailable in the Draft SHELAA.
1090	Longfield Nursery, Rectory Road, Stone Common, Blaxhall	Housing	Blaxhall	Blaxhall Commons and Open Spaces Charitable Trust	Development of nine houses would represent a 50% increase in the size of the cluster. A public right of way runs along the north-western boundary and development would have an impact on the quality of the landscape.	
1090	Longfield Nursery, Rectory Road, Stone Common, Blaxhall	Housing	Blaxhall	Private individual	Site would need to be cleared to provide visibility for access onto a narrow road.	
1090	Longfield Nursery, Rectory	Housing	Blaxhall	Private individual	Support one or two self build cottages on the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Stone Common, Blaxhall				brownfield site in Longfield Nursery.	
475	Land adjacent to Lion House	Housing	Blythburgh	Evolution Town Planning	No clear point of access which means it is difficult to achieve the site as an allocation.	Comments noted, access is identified as an issue and the site is not identified as a preferred site for allocation.
475	Land adjacent to Lion House	Housing	Blythburgh	Blythburgh Parish Council	In Conservation Area and has access issues	These issues are considered in the Draft Strategic Housing and Economic Land Availability Assessment.
504	Hawthorn Farm, Dunwich Road, Blythburgh, IP19 9LT	Housing	Blythburgh	Evolution Town Planning	Site promoted by landowner for residential use.	The site has not been taken forward as a preferred site as a number of constraints have been identified including; access, landscape impacts, and heritage assets.
797	Part garden of Farthings,	Housing	Blythburgh	Evolution Town	Site promoted by landowner for residential	The site has not been taken forward as a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	London Road and land adjacent			Planning	use.	preferred site as a number of constraints have been identified including; access, landscape impacts, heritage assets, and highways impacts.
797	Part garden of Farthings, London Road and land adjacent	Housing	Blythburgh	Blythburgh Parish Council	In Conservation Area but given safe access could have potential.	These issues are considered in the Draft Strategic Housing and Economic Land Availability Assessment.
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Scale of development is the biggest concern, in an area with single track roads, within the Area of Outstanding Natural Beauty, close proximity to designated landscapes and a village with large number of second homes already.	Boyton has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to allocate site.
762	Land South of Boyton Chapel,	Housing	Boyton	Private individual	Serious objections relating to flooding, lack of sewage,	A number of issues have

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	The Street				narrow roads, traffic at Wilford Bridge, little employment, no facilities or recreation space and no street lighting	been identified relating to the site including; access, landscape impacts, biodiversity value, and highways impacts.
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Objection based on no infrastructure, poor drainage, flooding, no employment, access to the Peninsula is already busy and the ability for the village to absorb a further 20 dwellings.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Boyton Parish Council	Wishes to register objection on the following grounds: Density of Housing, Heritage, Sustainability, Physical limits boundary, Access.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Boyton has barely any facilities, new housing would require infrastructure to bring	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					water, electricity and broadband up to scratch, narrow lanes in an Area of Outstanding Natural Beauty and Heritage Coast.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Site is not suitable for development, due to flooding, lack of infrastructure, poor roads to access the peninsular and need for protection of natural environment.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Do not consider site suitable for housing as the number of houses would drastically alter character of village, not facilities in the village and a need to use the private motor car, access is via a single track road.	
762	Land South of Boyton Chapel,	Housing	Boyton	Private individual	Objections relate to scale of development out of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	The Street				proportion to existing village, would spoil character of the village, no services or facilities in the village.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Do not consider the site suitable because the land drains very poorly, small village with no facilities, no public transport and is within the AONB.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Concerns relate to heritage and design, amenities, topography and parking.	
762	Land South of Boyton Chapel, The Street	Housing	Boyton	Private individual	Object to the proposed site because there are no facilities in the village, everybody needs a car, drainage is an issue and the village is surrounded by open farmland.	
51	Opposite Primary School,	land designation (area to be protected from development)	Bramfield	Clarke and Simpson	Site promoted by landowner for residential	The site is situated entirely within an Area

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bridge Street				use.	to be Protected from Development and is therefore not considered to be suitable for development.
60	Land opposite Little Orchard, Woodbridge Road, Bredfield	Housing	Bredfield	David Houchell Ltd	Site promoted for residential uses.	It is expected that land for housing would be identified through the Neighbourhood Plan.
60	Land opposite Little Orchard, Woodbridge Road, Bredfield	Housing	Bredfield	Bredfield Parish Council	Not suitable or achievable due to the visual impact and threat to change the character of the settlement	Comments noted. Under the SHELAA methodology the site is identified as a potentially suitable site. It is expected that land for housing would be identified through the Neighbourhood Plan process, and consideration of impact upon character can form

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						part of that process.
251	Land north of Ufford Road, Bredfield	Tourism	Bredfield	Bredfield Parish Council	Site not suitable, available or achievable	Comment noted - Site identified as unavailable in the Draft SHELAA
367	Land south of Chapel Farm, Woodbridge Road	Housing	Bredfield	Bredfield Parish Council	Site is available, but not suitable for inclusion due to its back-land situation, poor access and potential disturbance of a wildlife site	Site has been identified as unavailable in the Draft SHELAA, however could be considered further through work on the Neighbourhood Plan.
449	Land between Woodbridge Road & Ufford Road, Bredfield	Housing	Bredfield	Bredfield Parish Council	Site is available, but building in flooding risk area is contrary to the Local Plan and prospect of placing more concrete and brick would potentially increase risk to nearby properties and the presence of industrial and leisure units nearby would overload a small country	Comments noted. Under the SHELAA methodology the site is identified as a potentially suitable site. It is expected that land for housing would be identified through the Neighbourhood Plan process, and consideration of the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					lane with traffic	issues identified can form part of that process.
449	Land between Woodbridge Road & Ufford Road, Bredfield	Housing	Bredfield	Evolution Town Planning	Site promoted for residential use.	
459	Land Alongside Woodbridge Road	Housing	Bredfield	Bredfield Parish Council	Available, and suitable and achievable if problems of visibility and hedgerow loss could be resolved	It is expected that land for housing would be identified through the Neighbourhood Plan.
534	Land South of Tudor cottage, East of The Street, Bredfield	Housing	Bredfield	Bredfield Parish Council	Potentially suitable, if suitable access point could be determined – with compensatory planting for lost hedgerow - Listed building setting protected - Removal/relocation of overhead transformers and cables	It is expected that land for housing would be identified through the Neighbourhood Plan.
694	Land West of Woodbridge Road, IP13 6AE	Housing	Bredfield	Bredfield Parish Council	Not suitable, as it would involve the loss of local business, the access point is	Comments noted. Under the SHELAA methodology the site is

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					dangerous and there is possible ground contamination hazard	identified as a potentially suitable site. It is expected that land for housing would be identified through the Neighbourhood Plan process, and consideration of the issues identified can form part of that process.
694	Land West of Woodbridge Road, IP13 6AE	Housing	Bredfield	Evolution Town Planning	Site promoted for residential use	It is expected that land for housing would be identified through the Neighbourhood Plan.
695	Land East of Woodbridge Road, Bredfield	Housing	Bredfield	Bredfield Parish Council	Not suitable due to the threat to the character of the village settlement and intrusion onto the street and landscape	Comments noted. Under the SHELAA methodology the site is identified as a potentially suitable site. It is expected that land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						for housing would be identified through the Neighbourhood Plan process, and consideration of the issues identified can form part of that process.
695	Land East of Woodbridge Road, Bredfield	Housing	Bredfield	Evolution Town Planning	Site promoted for residential use	It is expected that land for housing would be identified through the Neighbourhood Plan.
696	Land East of Ufford Road, IP13 6AS	Housing	Bredfield	Bredfield Parish Council	Not suitable with poor access road, at the edge of a flood risk area would increase the flood risk locally and the significant impact on the landscape	Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
696	Land East of Ufford Road,	Housing	Bredfield	Evolution Town	Site promoted for residential use	Site identified as unsuitable in Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	IP13 6AS			Planning		SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement. It is expected that land for housing would be identified through the Neighbourhood Plan.
696	Land East of Ufford Road, IP13 6AS	Housing	Bredfield	Bredfield Parish Council	Not suitable due to the impact on the landscape and difficulties with traffic which outweigh any advantages	Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
696	Land East of Ufford Road, IP13 6AS	Housing	Bredfield	Evolution Town Planning	Site promoted for residential use	It is expected that land for housing would be identified through the Neighbourhood Plan.
697	Land South of	Housing	Bredfield	Private	Site is outside of the village	It is expected that land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Woodbridge Road, IP13 6AE			individual	envelope, if development is permitted the visual approach to Bredfield will be severely compromised.	for housing would be identified through the Neighbourhood Plan.
736	The Green Farm, Caters Road, Bredfield	Housing	Bredfield	Bredfield Parish Council	Not suitable due to poor access, single track road, proximity of listed buildings and damage to biodiversity	It is expected that land for housing would be identified through the Neighbourhood Plan.
737	The Green farm, Caters Road, Bredfield	Housing	Bredfield	Bredfield Parish Council	Not suitable as it is detached from the main settlement and would relate poorly to the existing built area and would be an intrusion onto the landscape. The presence of a listed building nearby also detracts from its suitability	Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
782	Land opposite Bredfield Place, Dallinghoo Road, IP13 6BD	Housing	Bredfield	Bredfield Parish Council	Not suitable as it is detached from the main settlement and would relate poorly to the existing settlement and would be an	It is expected that land for housing would be identified through the Neighbourhood Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					intrusion onto the landscape	
783	Land north of Ivy Lodge, The Street	Housing	Bredfield	Bredfield Parish Council	Not suitable too small	It is expected that land for housing would be identified through the Neighbourhood Plan.
784	Land between A12 & Woodbridge Road	Housing	Bredfield	Bredfield Parish Council	Not suitable due to poor access and significant impact on the landscape	It is expected that land for housing would be identified through the Neighbourhood Plan.
784	Land between A12 & Woodbridge Road	Housing	Bredfield	Private individual	Site is outside of the village envelope, if development is permitted the visual approach to Bredfield will be severely compromised.	It is expected that land for housing would be identified through the Neighbourhood Plan.
891	Land in between Sirocco and Ivy Lodge, The Street	Housing	Bredfield	Bredfield Parish Council	Not suitable too small	It is expected that land for housing would be identified through the Neighbourhood Plan.
894	Land west of May Tree Cottage, Caters Lane	Housing	Bredfield	Bredfield Parish Council	Not suitable for inclusion as being too small and with difficult access via a single-track lane	It is expected that land for housing would be identified through the Neighbourhood Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
944	Land south of Templars	Housing	Bredfield	Bredfield Parish Council	Not suitable due to major impact on street scene and landscape	It is expected that land for housing would be identified through the Neighbourhood Plan.
469	Hunters Heath, Brightwell	Housing	Brightwell	Private individual	Site promoted by landowner for residential use.	Comments noted. Site identified as potentially suitable through Draft SHELAA but not preferred having regard to Local Plan strategy and development coming forward in the area Brightwell Lakes.
469	Hunters Heath, Brightwell	Housing	Brightwell	Private individual	Site contiguous with Adastral Park will exacerbate the issues further.	
515	Sheepdrift Farm, Brightwell, IP10 OBJ	Housing	Brightwell	Private individual	Site promoted by landowner for residential use.	Comments noted. Site identified as potentially suitable through Draft SHELAA but not preferred having regard to Local Plan strategy and development coming forward in the area Brightwell Lakes.
515	Sheepdrift Farm, Brightwell, IP10 OBJ	Housing	Brightwell	Private individual	Site contiguous with Adastral Park will exacerbate the issues further.	
515	Sheepdrift Farm, Brightwell, IP10	Housing	Brightwell	SCC Highways	Sustainable links to north essential to link to local	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	OBJ				amenities.	
713	Land South of Adastral Park, Newbourne Road	Housing	Brightwell	Private individual	Site promoted by landowner for residential use.	Comments noted. Site identified as potentially suitable through Draft SHELAA but not preferred having regard to Local Plan strategy and development coming forward in the area Brightwell Lakes.
713	Land South of Adastral Park, Newbourne Road	Housing	Brightwell	Private individual	Site contiguous with Adastral Park will exacerbate the issues further.	
713	Land South of Adastral Park, Newbourne Road	Housing	Brightwell	SCC Highways	Links to north essential to create sustainable links to amenities.	
731	Bucklesham Road West	Housing	Brightwell	Private Individual	Not acceptable, any development should be close to the school and should incorporate trees as a boundary.	Comment noted. Site in Bucklesham (432) identified as preferred site is closer to the existing built up area, and the policy requires retention of trees and hedgerows.
731	Bucklesham Road West	Housing	Brightwell	Suffolk Wildlife	Further assessment is therefore required to	Comments noted. Site identified as potentially

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Trust	determine whether development in this location is likely to result in any adverse ecological impacts.	suitable through Draft SHELAA but not preferred having regard to Local Plan strategy and development coming forward in the area
731	Bucklesham Road West	Housing	Brightwell	SCC Highways	Footway link to existing footways on Main Rd required. Long distance so may not be feasible.	Brightwell Lakes.
732	Bucklesham Road East	Housing	Brightwell	Private Individual	Not acceptable, any development should be close to the school and should incorporate trees as a boundary.	Comment noted. Site in Bucklesham (432) identified as preferred site is closer to the existing built up area, and the policy requires retention of trees and hedgerows.
733	Bucklesham Road North	Housing Office Storage	Brightwell	Suffolk Wildlife Trust	Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological	Comments noted. Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					impacts.	settlement.
733	Bucklesham Road North	Housing Office Storage	Brightwell	SCC Highways	Footway link to existing footways on Main Rd required. Link through adjacent site 732. Long distance so may not be feasible.	
733	Bucklesham Road North	Housing Office Storage	Brightwell	Private Individual	Not acceptable, any development should be close to the school and should incorporate trees as a boundary.	Comment noted. Site in Bucklesham (432) identified as preferred site is closer to the existing built up area, and the policy requires retention of trees and hedgerows.
733	Bucklesham Road North	Housing Office Storage	Brightwell	Greenways Project	Undeveloped countryside not linked to other development or services.	Noted - site has been discounted as it is not within, adjoining or well related to the form of the settlement.
132	Land adj to Westward, Summer Lane	Housing	Bromeswell	Evolution Town Planning	Site promoted by landowner for residential use.	Noted, however the site is identified as unsuitable in Draft SHELAA due to access

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						constraints.
132	Land adj to Westward, Summer Lane	Housing	Bromeswell	Landowner / agent	Amendment to site area submitted. Land promoted for development.	Site amendment made. Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment due to significant constraints regarding access.
1069	Land adj. Hill Farm, Common Lane, Bromeswell	Housing	Bromeswell	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in an adverse impact on Bromeswell Green County Wildlife Site.	Comment noted however site identified as unavailable in the Draft SHELAA.
531	Land to rear of 6 Levington Lane, Bucklesham, IP10 0DZ	Housing	Bucklesham	Artisan PPS Ltd	An obviously acceptable extension to the adjacent area of land to the north where PP has already been granted.	Comment noted. The site is identified as potentially suitable in the SHELAA, however access may be difficult

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						to achieve.
732	Bucklesham Street East	Housing	Bucklesham	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted, however site identified as unsuitable in Draft SHELAA due to access constraints.
732	Bucklesham Street East	Housing	Bucklesham	SCC Highways	Footway link to existing footways on Main Rd required. Long distance so may not be feasible.	
766	Land south of White House Farm	Housing and Open Space	Bucklesham	Landbridge	Site promoted by landowner for residential use.	Site identified as suitable in Draft SHELAA however site 432 proposed for allocation was identified as providing a logical extension to the village with few constraints.
1028	Land north of White House, The Street	Housing	Bucklesham	Private individual	Not acceptable, any development should be close to the school and	Comment noted. Site in Bucklesham (432) identified as preferred

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					should incorporate trees as a boundary.	site is closer to the existing built up area, and the policy requires retention of trees and hedgerows.
274	Land adjacent to The Cottage, Woodbridge Road	Housing	Burgh	Private individual	The site is adjacent to the River Lark and regularly floods during the winter.	The Draft SHELAA identifies the site as being at risk from flooding, and identifies it as not being a potential site.
453	Former Middle School site, 9 Short Walk, IP12 3NU	Housing	Butley	Butley, Capel St Andrew & Wantisden Parish Council	Parish Could support this site in order to fulfil the outcome of a Housing Needs Survey carried out in June 2008.	Site identified as suitable in the Draft SHELAA however Butley is within the countryside in the settlement hierarchy and the Local Plan is not looking to allocate sites in the countryside.
453	Former Middle School site, 9 Short Walk, IP12	Housing	Butley	Evolution Town Planning	Site promoted by landowner for residential use.	Site identified as suitable in the Draft SHELAA however Butley

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	3NU					is within the countryside in the settlement hierarchy and the Local Plan is not looking to allocate sites in the countryside.
549	Land Between Church Road and B1084	Housing/Open Space	Butley	Capel St Andrew Farms	Site promoted by landowner for residential use.	Site identified as suitable in the Draft SHELAA however Butley is within the countryside in the settlement hierarchy and the Local Plan is not looking to allocate sites in the countryside.
549	Land Between Church Road and B1084	Housing/Open Space	Butley	SCC Highways	Footway improvements on Church Road. Site is some distance from amenities	Highways issues are identified in the Draft SHELAA.
84	Land adjacent to 35 Mill Lane	Housing	Campsea Ashe	Campsea Ashe Parish Council	Parish Council highlight that the land is not registered.	Site identified as unavailable in the Draft SHELAA
84	Land adjacent to 35 Mill Lane	Housing	Campsea Ashe	Private Individual	Site 84 is more suitable than 422 from	Comments noted however site identified

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					environmental point of view and it is closer to the A12.	as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment.
129	Land at 239 Ashe Row, B1078	Housing	Campsea Ashe	Campsea Ashe Parish Council	Parish Council outline that the owner was unaware that his land had been put forward.	Site identified as unavailable in the Draft SHELAA
422	Land to the south of Station Road	Housing	Campsea Ashe	Private Individual	Development of this site would impact on Listed Buildings.	Comments noted. Part of site is identified as a preferred site however policy requires design and layout to reflect location close to Grade II Listed Building. Site 84 identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment.
422	Land to the south of Station Road	Housing	Campsea Ashe	Private Individuals	Development of this site would impact on Listed Buildings, and also is within a Special Landscape Area. Is located further away from the village than site 84.	
422	land to the south of Station Road	Housing	Campsea Ashe	Clarke & Simpson	Site promoted by landowner for residential use.	Noted, site is proposed as preferred allocation.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
422	land to the south of Station Road	Housing	Campsea Ashe	Landbridge	This land is wrong for development in terms of landscape, impact on neighbouring properties, drainage, access and local services. It would also create an unfortunate precedent in planning terms.	The comments have been considered through the site identification process. Campsea Ashe is identified as a small village in the settlement hierarchy, with potential for some growth, and the site is well related to the station. The policy requires development to reflect the location close to the Grade II Listed Building. A small area of surface water flooding is identified in the northern part of the site and therefore specific reference is included in relation to management of surface water flooding

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
102	Land adjacent to Charsfield Primary School	Housing/Open Space/Parking	Charsfield	Charsfield Parish Council	Development not acceptable Road safety issues. Adjacent to school	Comment noted. The site is not a preferred site as sites elsewhere in the Parish are more suitable for allocation.
102	Land adjacent to Charsfield Primary School	Housing/Open Space/Parking	Charsfield	Private individual	Exclude this site.	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment however in particular issues related to impact on the setting of Grade I St Peter's Church may be difficult to overcome and therefore site 812 is identified as a preferred site for allocation.
286	Land south of Hill Farm	Housing	Charsfield	Private individual	Objects to the site on issues such as road safety, access, services, environment, biodiversity and elevations.	Comments noted. Suffolk County Council comments suggest that an acceptable access could be achieved,
286	Land south of	Housing	Charsfield	Private	Outline concerns in respect	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hill Farm			individual	of poor visibility, narrow roads, no pavement and insufficient capacity for services.	however the site is not proposed for allocation and it may be difficult to overcome impacts on the setting of the church.
286	Land south of Hill Farm	Housing	Charsfield	Charsfield Parish Council	Development not acceptable Road safety issues.	
318	Land at and surrounding Highfields, Davey Lane	Housing	Charsfield	Charsfield Parish Council	Plots 318,813 and 814 Total indicative use of 27. Over development. 8 between these three areas: mixed development preferable.	Comment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the form of the settlement.
416	land east of St Peter's Church, The Street	Housing	Charsfield	Charsfield Parish Council	Development not appropriate bearing in mind the adjacent planning permission for 20. Access not appropriate.	Comment noted. Site identified as unavailable in the Draft SHELAA
417	land north of The Limes, Church Road	Housing	Charsfield	Charsfield Parish Council	Development not appropriate bearing in mind the adjacent planning permission for 20. Access	Comment noted. Site identified as unavailable in the Draft SHELAA

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					not appropriate.	
418	land to the rear of Rose Cottage, Chapel Lane	Housing	Charsfield	Charsfield Parish Council	Not suitable for development	Comment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the form of the settlement.
812	Land behind 15 St Peters Close	Housing	Charsfield	Charsfield Parish Council	Development not appropriate bearing in mind the adjacent planning permission for 20. Access not appropriate.	The comments have been considered in identifying preferred sites. Charsfield is identified as a small village in the settlement hierarchy with potential for some development. Suffolk County Council have not raised any issues in relation to an access via St Peter's Close.
813	Land adj to Highfields, Davey Lane	Housing	Charsfield	Charsfield Parish Council	Plots 318,813 and 814 Total indicative use of 27. Over development. 8 between	Comment noted. Site identified as unsuitable in Draft SHELAA – site is

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					these three areas: mixed development preferable.	not within, adjoining, adjacent or well related to the form of the settlement.
814	Land between Davey Lane and Church Lane	Housing	Charsfield	Charsfield Parish Council	Plots 318,813 and 814 Total indicative use of 27. Over development. 8 between these three areas: mixed development preferable.	Comment noted. Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
889	Land North of South Cottage, Chapel Lane	Housing	Charsfield	Charsfield Parish Council	Would lead to excessive traffic on Chapel Lane and would detrimentally affect the natural landscape	Comment noted. Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
890	Land South of Springfield House, Chapel	Housing	Charsfield	Charsfield Parish Council	Not suitable for development for reasons previously cited and	Comment noted. The site is not a preferred site as sites elsewhere in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane				planning permission refused.	the Parish are more suitable for allocation. Furthermore, significant access and highways constraints have been identified.
101	Land opposite The Hawthorns, Chediston Green	Affordable housing	Chediston	SCC Highways	No footways from village. Significant pedestrian infrastructure required. Very narrow road along site frontage.	Comment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the form of the settlement.
541	Land Connected to The Farm Stead, Chediston	Housing	Chediston	Private individual	The site summary states that 1 dwelling has been registered but I had supplied a correction to this showing 3 enhanced sheltered housing units with 3 carer accommodation units. I can supply outline drawings for this if needed.	Comment noted. The scale of the site is not suitable for allocation in the Draft Local Plan (i.e below 0.2ha).

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
700	Site A, North of Orford Road, IP12 3PS	Housing	Chillesford	Suffolk Wildlife Trust	Site is adjacent to the Sandlings SPA, Sandlings Forest SSSI and Aldewood Forest CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	Comments noted. Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement. Landscape and environment impacts have been identified through the SHELAA.
700	Site A, North of Orford Road, IP12 3PS	Housing	Chillesford	Evolution Town Planning	Site promoted by landowner for residential use.	Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
701	Site B, South of Orford Road,	Housing	Chillesford	Evolution Town Planning	Site promoted by landowner	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						– site is not within, adjoining, adjacent or well related to the form of the settlement.
702	Site C, North of Orford Road	Housing	Chillesford	Evolution Town Planning	Site promoted by landowner	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is not within, adjoining, adjacent or well related to the form of the settlement.
703	Site D, Land West of Pedlars Lane, Chillesford, IP12 3PS	Housing	Chillesford	Evolution Town Planning	Site promoted by landowner for residential use.	Whilst the site is identified as potentially suitable in the SHELAA, Chillesford has been identified as a settlement in the countryside in the updated settlement hierarchy, and therefore, the Council has looked elsewhere to

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						allocate sites.
290	Land south Village Hall, Manor Road	Housing	Clopton	SCC Highways	Manor road and Snipe Farm Rd both too narrow to support expected traffic movements	Coment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
298	Land opposite Potash Cottages, Market Hill	Housing	Clopton	Private individual	Alarmed by proposals because of impact on listed buildings, no amenities or services in the village, localised flooding, road safety and impact on wildlife.	Coment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
300	Land opposite Peartree Farm, Grundisburgh Road	Housing	Clopton	Private individual	Alarmed by proposals because of impact on listed buildings, no amenities or services in the village, localised flooding, road safety and impact on wildlife.	Coment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
301	Land opposite Peartree Farm,	Housing	Clopton	Private individual	Alarmed by proposals because of impact on listed	Coment noted. The site is not a potential site as

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Grundisburgh Road				buildings, no amenities or services in the village, localised flooding, road safety and impact on wildlife.	it is not within, adjoining, adjacent or well related to the built form of the settlement.
302	Land south Peartree Farm, Grundisburgh Road	Housing	Clopton	Private individual	Alarmed by proposals because of impact on listed buildings, no amenities or services in the village, localised flooding, road safety and impact on wildlife.	Coment noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
241	Land south of 13 Granary Cottages	Housing	Darsham	Darsham Parish Council	Only site the Parish Council consider suitable.	Site identified as unavailable in the Draft SHELAA.
357	Land east of Boundry House, Westleton Road	Housing	Darsham	Private individual	Site not suitable as it would result in huge increase of current population, impact on environment, concern about local infrastructure make this proposal totally inappropriate.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						to the form of the settlement.
660	Land East of The Street, Darsham	Housing	Darsham	Darsham Parish Council	A logical infill between Heritage Housing and one of our new small estates. In ten years time, this may become acceptable to the residents of Darsham, but for the reasons given above, not in the near future.	The comments have been taken into account in identifying preferred sites. It is considered that the site would represent a logical development alongside the Millfields development.
690	Land South of Darsham Station, East of A12, North of Yoxford	Housing	Darsham	Clarke & Simpson	Site promoted by landowner for residential use.	The comments have been considered in identifying preferred sites for allocation. The allocation of the site accords with the strategy of the local plan of focusing growth along the A12 corridor and provides opportunities for use of rail travel. The
690	Land South of Darsham Station, East of A12, North of Yoxford	Housing	Darsham	Darsham Parish Council	All these sites are unacceptable, as they would transform the village into a town some 5 times larger than its size in 2012.	
690	Land South of	Housing	Darsham	Private	Site not suitable as it would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Darsham Station, East of A12, North of Yoxford			individual	result in huge increase of current population, impact on environment, concern about local infrastructure make this proposal totally inappropriate.	policy requires provision of improvements to pedestrian and cycle connectivity with the station. In terms of environmental impact, the policy SCLP12.44
690	Land South of Darsham Station, East of A12, North of Yoxford	Housing	Darsham	SCC Highways	Footway plus widening of Westleton Road required plus ped crossing to continuous footway on A12	requires the design and layout of the development to be sympathetic to the setting of Cockfield Hall Park.
691	LAND AT THE STREET DARSHAM, IP17 3QF	Housing	Darsham	Darsham Parish Council	All these sites are unacceptable, as they would transform the village into a town some 5 times larger than its size in 2012.	Comments noted. The site has been identified as potential. However, sites elsewhere in the Parish have been identified as more suitable for allocation.
691	LAND AT THE STREET DARSHAM, IP17	Housing	Darsham	SCC Highways	Link into existing footway on The Street	Highways comments are taken into account in the Draft SHELAA.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	3QF					
692	LAND TO THE EAST OF FOX LANE DARSHAM IP17 3QF	Housing	Darsham	Darsham Parish Council	All these sites are unacceptable, as they would transform the village into a town some 5 times larger than its size in 2012.	Comments noted. Site identified as potential. However, sites elsewhere in the Parish have been identified as more suitable for allocation.
692	LAND TO THE EAST OF FOX LANE DARSHAM IP17 3QF	Housing	Darsham	SCC Highways	Fox lane would require widening plus footway. Low Road unsuitable for access without significant improvement.	Highways comments are taken into account in the Draft SHELAA.
875	Land adjacent 8 Woodbridge Road	Housing	Debach	SCC Highways	No footways present and remote from amenities. Significant improvements required to accommodate this level of development.	The site has been identified as not suitable through the Draft SHELAA as it is not within, adjoining or well related to the form of the settlement.
62	Land off Laxfield Road	Housing	Dennington	Clarke & Simpson	Site promoted by landowner for residential use.	Site has been included as proposed allocation due to representing a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
62	Land off Laxfield Road	Housing	Dennington	Artisan PPS Ltd	Additional land promoted by neighbouring landowner for residential use.	logical extension which reflects the village form. The site is also well related to the school (and provides an opportunity for land to be reserved for future school uses) and the policy contains criteria related to minimising any impacts on the nearby Listed Buildings and Conservation Area.
860	Land adjacent to Bardolph Cottages, Saxstead Road	Housing	Dennington	Clarke & Simpson	Site promoted by landowner for residential use.	Comment noted. Site 62 is consider to provide greater benefits and is therefore proposed for allocation.
861	Land to the rear of Dennington Lodge, Laxfield Road	Employment	Dennington	Clarke & Simpson	Site promoted by landowner for residential use.	Comment noted. Based upon evidence of need the Lcoal Plan allocates strategic scale employment sites

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						elsewhere in the District.
184	Land opposite the Town House Cottages, Westleton Road	Housing	Dunwich	Dunwich Parish Meeting	Inappropriate for development. Remote from community and is a natural area used by local people.	Comments noted. Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is not within, adjoining, adjacent or well related to the form of the settlement.
184	Land opposite the Town House Cottages, Westleton Road	Housing	Dunwich	Suffolk Wildlife Trust	Site is adjacent to Dunwich Valley Woods and Grassland CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
184	Land opposite the Town House Cottages,	Housing	Dunwich	Private individual	Site not suitable as it is a long way from the village envelope, site is also of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Westleton Road				interest for wildlife.	
184	Land opposite the Town House Cottages, Westleton Road	Housing	Dunwich	SCC Highways	No footways from village. Significant pedestrian infrastructure required.	
383	Land at Street Farm, Brandeston Road, Earl Soham	Housing	Earl Soham	Landbridge	Site promoted by landowner for residential use.	Comments noted. The site is not a potential site as it has been deemed not within, adjoining or well related to the settlement.
383	Land at Street Farm, Brandeston Road, Earl Soham	Housing	Earl Soham	East Coast Planning Services Ltd	Highly sustainable settlement and support redevelopment of this largely brownfield site for residential use.	
523	Earl Soham Business Centre, to the north of Earl Soham	Housing	Earl Soham	Landbridge	Site promoted by landowner as an extension to existing employment use.	Comments noted. The site has been proposed to the Council as an allocation for residential development. The site is not a potential site as it has been deemed not within, adjoining or well

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						related to the settlement.
321	Land south of Lyndon Cottages, Bakers Hill	Housing	Eastbridge	Suffolk Wildlife Trust	Site adjacent to Minsmere-Walberswick Heaths & Marshes SSSI. Further assessment is required to determine whether development in these locations is likely to result in an adverse impact on this site.	Comments noted. Landscape constraints have been identified on the site. The site is not a preferred site as sites elsewhere in the District are more suitable for allocation.
321	Land south of Lyndon Cottages, Bakers Hill	Housing	Eastbridge	J Hancock and Associates	If developed would create an incursion into open countryside.	
9	Land adj to The Round Cottage, Framlingham Road	Not specified	Easton	Easton Parish Council	Unspecified	Comments noted. The site is below 0.2 hecatres with capacity for 3 homes so is too small for a Draft Local Plan allocation.
9	Land adj to The Round Cottage, Framlingham Road	Not specified	Easton	Private individual	Insufficient space for another dwellings in conservation area.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
63	Land at rear Four Pheasants, The Street	Housing	Easton	Easton Parish Council	Unsuitable, within setting of listed buildings and adjacent to conservation area.	The site is not proposed for allocation reflecting comments and the site situation in a locally designated historic park and garden.
63	Land at rear Four Pheasants, The Street	Housing	Easton	Private individual	Access issues, backfill development	
63	Land at rear Four Pheasants, The Street	Housing	Easton	Private individual	Access is through privately owned land.	
97	Land adj to The Round House, Pound Corner	Housing	Easton	Easton Parish Council	Unsuitable, outside physical limits boundary and adjacent to area to be protected from development and conservation area.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
97	Land adj to The Round House, Pound Corner	Housing	Easton	Private individual	Access road is already well used on a dangerous blind bend which is not suitable for increase traffic.	
97	Land adj to The Round House, Pound Corner	Housing	Easton	Private individual	Access issues, backfill development	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
97	Land adj to The Round House, Pound Corner	Housing	Easton	Private individual	Development is possible but would spoil the outlook of the properties in Framlingham Road.	
404	land west of School Lane	Housing	Easton	Easton Parish Council	Unsuitable, outside of physical limits, conservation area and no suitable access.	Site identified as not available in Draft SHELAA
404	land west of School Lane	Housing	Easton	Private individual	Access is only via a single track lane	
404	land west of School Lane	Housing	Easton	Private individual	No appropriate access	
404	land west of School Lane	Housing	Easton	Private individual	Land considerably lower than surrounding fields means site is rather soft and retains moisture	
404	land west of School Lane	Housing	Easton	Private individual	Suitability is limited by very narrow single track road which could not sustain any increase in vehicle movements.	
404	land west of School Lane	Housing	Easton	Private individual	Site is restricted by size of School Land.	
404	land west of School Lane	Housing	Easton	Private individual		

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
411	land east of Harriers Walk	Housing	Easton	Easton Parish Council	Unsuitable, outside physical limits, within historic parkland, no access.	Site identified as not available in Draft SHELAA
411	land east of Harriers Walk	Housing	Easton	Private individual	Backfill development with poor access,	
411	land east of Harriers Walk	Housing	Easton	Private individual	Access through privately owned land	
411	land east of Harriers Walk	Housing	Easton	Private individual	Unsuitable for development as within historic park, no suitable access.	
411	land east of Harriers Walk	Housing	Easton	SCC Highways	Unclear how site would link to The Street. Roads such as Harriers Walk may not be suitable for linkage	
463	Cemetery Field, School Lane, Easton	Housing	Easton	Easton Parish Council	Unsuitable, outside physical limits, within historic parkland, no access.	Identified as not suitable in Draft SHELAA due to access constraints.
463	Cemetery Field, School Lane, Easton	Housing	Easton	Private individual	Access is only via single track land on higher ground	
463	Cemetery Field, School Lane, Easton	Housing	Easton	Private individual	No proper access to the site	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
463	Cemetery Field, School Lane, Easton	Housing	Easton	Private individual	Suitability is limited by very narrow single track road which could not sustain any increase in vehicle movements.	
463	Cemetery Field, School Lane, Easton	Housing	Easton	Private individual	Site previously considered unsuitable by Planning Committee and Local Plan, higher ground would impact residential amenity. Access is not suitable.	
463	Cemetery Field, School Lane, Easton	Housing	Easton	Private individual	Access is only via a single track road.	
516	Land adjacent to The Old Osiers, The Street, IP13 0ED	Housing	Easton	Easton Parish Council	Unsuitable, outside physical limits, river valley, would create negative impact on conservation area.	The site has been identified as not suitable through the Draft Strategic Housing and
516	Land adjacent to The Old Osiers, The Street, IP13 0ED	Housing	Easton	Private individual	Hopkins Homes development set precedent, any development should be set back sufficiently from main	Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					road.	settlement.
730	Next to Car Park, Easton Street	Housing	Easton	Easton Parish Council	Unsuitable as site is protected from development within conservation area.	Comments noted. Site is too small for a Draft Local Plan allocation for new housing.
730	Next to Car Park, Easton Street	Housing	Easton	Private individual	Many previous planning applications have been refused on this site.	
730	Next to Car Park, Easton Street	Housing	Easton	Private individual	Site should be considered for providing tourist accommodation.	
730	Next to Car Park, Easton Street	Housing	Easton	Private individual	Currently a valuable village car park, site to be protected from development in Local Plan.	
730	Next to Car Park, Easton Street	Housing	Easton	Private individual	Brewery meadow has been refused permission several times, because it is subject to flooding	
738	Easton Farm Park, Pond Corner	Housing/Retail/Leisure/Holiday/off ice	Easton	Easton Parish Council	Suitable, site is Farm Park, suitable for restrained growth with minimal impact on business related	The site is assessed in supporting employment land evidence as unsuitable due to a lack

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					tourism and lesirue.	of access to
738	Easton Farm Park, Pond Corner	Housing/Retail/Leisure/Holiday/off ice	Easton	Private individual	Suitable for small scale industrial and residential development.	transport/strategic transport networks and as such is considered to have limited market attractiveness to meet evidenced employment needs.
739	Sanctuary Field, Pound Corner	Housing/ Holiday Accomidation	Easton	Easton Parish Council	Unsuitable, outside of physical limits, adjacent to area to be protected from development, within conservation area and poorly related to village.	Site identified as potentially suitable in Draft SHELAA, however it is expected that the Neighbourhood Plan will consider housing allcoations.
739	Sanctuary Field, Pound Corner	Housing/ Holiday Accomidation	Easton	Private individual	Adjacent to conservation area and historic “round-house”	
739	Sanctuary Field, Pound Corner	Housing/ Holiday Accomidation	Easton	Private individual	Access road is already well used on a dangerous blind bend which is not suitable for increase traffic.	
739	Sanctuary Field, Pound Corner	Housing/ Holiday Accomidation	Easton	Private individual	Lower part of the site is subject to flooding.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
740	Kettleburgh Road, Easton	Housing	Easton	Easton Parish Council	Unsuitable, outside pf physical limits, listed buildings nearby, no access.	Site identified as potentially suitable in Draft SHELAA, however it is expected that the Neighbourhood Plan will consider housing allcoations.
740	Kettleburgh Road, Easton	Housing	Easton	Private individual	Backfill development adjacent to conservation area.	
740	Kettleburgh Road, Easton	Housing	Easton	Private individual	Access road is already well used on a dangerous blind bend which is not suitable for increase traffic.	
740	Kettleburgh Road, Easton	Housing	Easton	Private individual	Development is possible but would spoil the outlook of the properties in Framlingham Road.	
796	Land adj to The Kennels, The Street	Housing	Easton	Easton Parish Council	Unsuitable, outside physical limits, adjacent to area to be protected from development, within conservation area.	Comments noted. Site identified as not suitable in Draft SHELAA due to location in flood zone 3b.
796	Land adj to The Kennels, The Street	Housing	Easton	Private individual	Flood plain	
796	Land adj to The	Housing	Easton	Private	Totally unsuitable as within	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Kennels, The Street			individual	floodplain.	
796	Land adj to The Kennels, The Street	Housing	Easton	Private individual	Site is often flooded.	
796	Land adj to The Kennels, The Street	Housing	Easton	SCC Highways	Footway along frontage and link to existing footway required. Potential requirement for 30mph speed limit extension.	
279	Land South of Manor Cottages, Castle Hill	Housing	Eyke	Smith Jenkins	Access issues and site would represent notable extrusion of village to the north.	Comments noted however site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
280	Land rear of The Old Mill House, The Street	Housing	Eyke	Smith Jenkins	Site is remote from village and there are likely to be highways issues.	Comments noted however site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
423	Church Farm,	Housing / Open space	Eyke	Smith	Access issues and impact on	Comments noted. Site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Eyke			Jenkins	the AONB.	423 is not identified as a proposed allocation.
776	Land to the south of Eyke CoE Primary School and East of The Street	Housing / car park / open space	Eyke	Smith Jenkins	Sustainability Appraisal should not identify negative effects against objective to improve quality of life where people live and work.	Sustainability Appraisal of First Draft Local Plan does not identify negative effects against this objective.
776	Land to the south of Eyke CoE Primary School and East of The Street	Housing/Car Park/Open Space	Eyke	Smith Jenkins	Site promoted by landowner for residential use.	Site is identified as a preferred site. Eyke is identified as a small village however the site provides opportunities
776	Land to the south of Eyke CoE Primary School and East of The Street	Housing/Car Park/Open Space	Eyke	Landbridge	Site promoted by landowner for residential use with extension to school car park and village open space.	to secure benefits for the school and the community.
777	Land to the west of The Street, Eyke	Housing/Open Space	Eyke	Smith Jenkins	Site promoted by landowner for residential use.	Comment noted. Site identified as a potential site. However, site 776 has been identified as more suitable for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						allocation due to scope for greater benefits.
777	Land to the west of The Street, Eyke	Housing / open space	Eyke	Smith Jenkins	Sustainability Appraisal should not identify negative effects against objective to improve quality of life where people live and work.	Sustainability Appraisal of First Draft Local Plan does not identify negative effects against this objective.
67	Land adj The Old Dog, Lower Falkenham Road	Housing	Falkenham	Private individual	One property would not have a major effect but it may on the people around and this should be taken into serious consideration.	Comment noted. Site has not been made available for allocation.
976	Land at Kirton Road	Housing	Falkenham	Kirton and Falkenham Parish Council	Sustainability Appraisal should identify negative effects for transport and landscape.	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal has not been undertaken.
976	Land at Kirton	Housing	Falkenham	Kirton &	STRONGLY NEGATIVE.	Comments noted. Site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Falkenham			Falkenham Parish Council	Ribbon development which would significantly link Kirton & Falkenham, adversely affecting their different characters. Loss of high quality agricultural land.	identified as not potential as it is not within, adjoining, adjacent or well related to a settlement and is therefore not suitable for allocation.
976	Land at Kirton Road, Falkenham	Housing	Falkenham	Private individual	Objection on grounds of access/traffic/parking/road safety.	
144	Haven Exchange, Walton Avenue	Housing	Felixstowe	Private individual	Brownfield site more central to the town should be considered for development.	Site identified as suitable, but would lead to loss of allocated employment land.
144	Haven Exchange Site, Walton Avenue	Housing	Felixstowe	SCC Highways	Sustainable links to north required	This site is allocated in the Felixstowe Peninsula Area Action Plan (policy FPP12).
623	land at The Forum Centre, Sea Road	Mixed use	Felixstowe	Private individual	Development at Sea Road is ridiculous as it will tower over its neighbours and breaches policy on affordable housing.	Comment noted. Draft SHELAA identifies site as not available.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
624	land at Mannings Amusement Park, Sea Road	Mixed use	Felixstowe	Private individual	Development at Sea Road is ridiculous as it will tower over its neighbours and breaches policy on affordable housing.	Comment noted. Draft SHELAA identifies site as not available.
625	land at Felixstowe Sundry Market site, Sea Road	Mixed use	Felixstowe	Private individual	Development at Sea Road is ridiculous as it will tower over its neighbours and breaches policy on affordable housing.	Comment noted. Draft SHELAA identifies site as not available.
625	Land at Felixstowe Sunday Market site, Sea Road	Mixed use	Felixstowe	Private individual	Planning application in for mixed use development.	Site is allocated in Felixstowe Area Action Plan and is proposed to be carried forward in to the new Local Plan under policy SCLP12.9.
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	Private individual	Site adjacent to AONB and there should be no further development in this area.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	Comment noted. Draft Strategic Housing and Economic Land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Availability Assessment identifies site as not available.
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	Private individual	Should not be built on, as this land is Felixstowe's last remaining green fields	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	Private individual	Overlooks AONB and inappropriate for development, lack of infrastructure and loss of agricultural land.	Comment noted. Draft Strategic Housing and Economic Land Availability Assessment identifies site as not available.
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	Private individual	Our very last areas of accessible countryside and close to the ANOB. They are too far from facilities.	Comment noted. Draft SHELAA identifies site as not available.
631	Land adjacent to Laurel Farm, Marsh Lane	Housing	Felixstowe	SCC Highways	Widening of Ferry Road (and potentially Marsh Lane) plus footways required	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
633	Land at and surrounding Fleet House, Marsh Lane	Housing	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	Comment noted. Draft Strategic Housing and Economic Land Availability Assessment identifies site as not available.
633	Land at and surrounding Fleet House, Marsh Lane	Housing	Felixstowe	Private individual	Site adjacent to AONB and there should be no further development in this area.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
633	Land at and surrounding Fleet House, Marsh Lane	Housing	Felixstowe	Private individual	Overlooks AONB and inappropriate for development, lack of infrastructure and loss of agricultural land.	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment
633	Land at and surrounding Fleet House, Marsh Lane	Housing	Felixstowe	Private individual	Should not be built on, as this land is Felixstowe's last remaining green fields	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment
633	Land at and	Housing	Felixstowe	Private	Our very last areas of	Comment noted.Site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	surrounding Fleet House, Marsh Lane			individual	accessible countryside and close to the AONB. They are too far from facilities.	identified as unavailable in Draft SHELAA
633	Land at and surrounding Fleet House, Marsh Lane	Housing	Felixstowe	SCC Highways	Widening of Ferry Road (and potentially Marsh Lane) plus footways required	
644	Land at Candlet Road	Housing Care Home Open Space Office	Felixstowe	Felixstowe Town Council	Outline planning permission granted	Comments noted. Site has outline planning permission. Additionally, the site is part of the preferred site, site allocation SCLP12.3.
644	Land at Candlet Road	Housing, care home, open space, office	Felixstowe	Private individual	No consideration appears to be given to the aesthetic appearance and the beauty of this area. This type of urban sprawl development takes no account of the impact on the area for generations to come and creates an environment no one actually wants to live	Comments noted. Site has outline planning permission. Additionally, the site is part of the preferred site, site allocation SCLP12.3.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					in. Crossing the boundary of the A14 will lead to further infill development, once this landscape is lost it is gone forever	
644	Land at Candlet Road	Housing, care home, open space, office	Felixstowe	Richard Brown Planning Limited	Site promoted by landowner for a residential mixed use development.	
644	Land at Candlet Road	Housing, care home, open space, office	Felixstowe	Private individual	Areas should be sacrosanct and clearly marked as not for development of any kind.	
644	Land at Candlet Road	Housing, care home, open space, office	Felixstowe	SCC Highways	No further comments - site subject to recent planning process.	
750	Land north of Candlet Road	Housing and Open Space	Felixstowe	Trinity College, Cambridge	Land promoted for development	Site proposed for allocation as part of North Felixstowe Garden Neighbourhood
750	Land north of Candlet Road	Housing and Open Space	Felixstowe	Private individual	Should not be built on, as this land is Felixstowe's last remaining green fields	Site proposed for allocation as part of North Felixstowe

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Garden Neighbourhood
750	Land north of Candlet Road	Housing and Open Space	Felixstowe	Private individual	Development of this site seems a sensible longer term approach.	The site forms part of the proposed North Felixstowe Garden Neighbourhood.
750	Land North of Candlet Road	Housing and Open Space	Felixstowe	Private individual	No consideration appears to be given to the aesthetic appearance and the beauty of this area. This type of urban sprawl development takes no account of the impact on the area for generations to come and creates an environment no one actually wants to live in. Crossing the boundary of the A14 will lead to further infill development, once this landscape is lost it is gone forever	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden
750	Land North of Candlet Road	Housing and Open Space	Felixstowe	Private individual	Represents a serious encroachment beyond a defined boundary onto	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					prime farmland which borders the AONB. A rural area would become urbanised and unique habitat, landscape and productive farmland will be lost. The local infrastructure including roads, schools and sewerage will be overloaded by such a large development.	Neighbourhood would include services and facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan.
750	Land North of Candlet Road	Housing and Open Space	Felixstowe	Private individual	Our very last areas of accessible countryside and close to the AONB. They are too far from facilities.	Access considered as part of wider North Felixstowe Garden Neighbourhood.
750	Land North of Candlet Road	Housing and Open Space	Felixstowe	SCC Highways	Adjacent to Candlet Road site (allowed by SoS). No vehicular access from Gulpher Road as this is a quiet lane. Likely to require a link off the HE A14(T) road at Dock Spur roundabout or	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					a link off the proposed roundabout on Candlet Road, would require multiple access points due to size. Candlet Track is a bridleway and forms the northern boundary of the site. Access for sustainable modes via link road to Walton High Street provided by the Walton North site. Also via Gulpher Road for walking and cycling links.	
759	Land west of Port of Felixstowe Road	Housing and Open Space	Felixstowe	Private individual	Development of this site seems a sensible longer term approach.	Site identified as unsuitable as it is entirely within a designated Area to be Protected from Development.
759	Land west of Port of Felixstowe Road	Housing and Open Space	Felixstowe	Private individual	Site much more suited for development.	Site identified as unsuitable as it is entirely within a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						designated Area to be Protected from Development.
800	Land adj playing field, Quintons Lane	Housing	Felixstowe	Private individual	Site adjacent to AONB and there should be no further development in this area.	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and
800	Land adj playing field, Quintons Lane	Housing	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	
800	Land adj playing field, Quintons Lane	Housing	Felixstowe	Private individual	Overlooks AONB and inappropriate for development, lack of infrastructure and loss of agricultural land.	
800	Land adj playing field, Quintons Lane	Housing	Felixstowe	Private individual	Land should not be built on as it is Felixstowe's last remaining green fields	
800	Land adj playing field, Quintons Lane	Housing	Felixstowe	Felixstowe Town Council	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 644 which has Outline permission for 570	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					homes	facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan.
800	Land adj to playing field, Quinton's Lane	Housing	Felixstowe	Private individual	Our very last areas of accessible countryside and close to the ANOB. They are too far from facilities.	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the
800	Land adj to playing field, Quinton's Lane	Housing	Felixstowe	SCC Highways	Approach roads very narrow without footways. Significant improvements required.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						<p>delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan. Access considered as</p>

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						part of wider North Felixstowe Garden Neighbourhood.
801	Land adj to park Farm, Hyem's Lane	Physical limits extension	Felixstowe	Felixstowe Town Council	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 644 which has Outline permission for 570 homes	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and
801	Land adj to park Farm, Hyem's Lane	Housing	Felixstowe	Private individual	Site adjacent to AONB and there should be no further development in this area.	
801	Land adj to park Farm, Hyem's Lane	Housing	Felixstowe	Private individual	Land should not be built on as it is Felixstowe's last remaining green fields	
801	Land adj to park Farm, Hyem's Lane	Housing	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	
801	Land adj to park Farm, Hyem's Lane	Housing	Felixstowe	Private individual	Overlooks AONB and inappropriate for development, lack of infrastructure and loss of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					agricultural land.	facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan.
801	Land adj to park Farm, Hyem's Lane	Physical limits extension	Felixstowe	Private individual	Our very last areas of accessible countryside and close to the ANOB. They are too far from facilities.	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan.
802	Land beind Upperfield Drive	Housing	Felixstowe	Private individual	Site adjacent to AONB and there should be no further	Consideration has been given to comments

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development in this area.	received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and facilities within the site. The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a
802	Land beind Upperfield Drive	Housing	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	
802	Land beind Upperfield Drive	Housing	Felixstowe	Private individual	Land should not be built on as it is Felixstowe's last remaining green fields	
802	Land beind Upperfield Drive	Housing	Felixstowe	Private individual	Overlooks AONB and inappropriate for development, lack of infrastructure and loss of agricultural land.	
802	Land beind Upperfield Drive	Housing	Felixstowe	Felixstowe Town Council	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 644 which has Outline permission for 570 homes	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						fundamental element of the indicative draft masterplan.
802	Land behind Upperfield Drive	Housing	Felixstowe	Private individual	Our very last areas of accessible countryside and close to the ANOB. They are too far from facilities.	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. The Garden Neighbourhood would include services and facilities within the site.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						The provision of significant green areas in the northern part of the site, which would provide a buffer with the AONB, are a fundamental element of the indicative draft masterplan.
802	Land behind Upperfield Drive	Housing	Felixstowe	SCC Highways	Assessment of whether residential approach road (upperfield Drive) could accommodate additional traffic flows required	Access considered as part of wider North Felixstowe Garden Neighbourhood.
935	Peewit & Felixstowe Beach Caravan Park	Housing	Felixstowe	Private individual	Brownfield site more central to the town should be considered for development.	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment
935	Peewit & Felixstowe Beach Caravan	Housing	Felixstowe	SCC Highways	Improved access onto A154 required plus links to north of site. Potentially ped	Comment noted.Site identified as unavailable in Draft SHELAA

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Park, Walton Avenue				crossing facilities	
936	Land at Suffolk Sand Holiday Park	Housing	Felixstowe	Private individual	Brownfield site more central to the town should be considered for development.	Comment noted. Draft Strategic Housing and Economic Land Availability Assessment identifies the site as not being available.
936	land at Suffolk Sands Holiday Park, Carr Road	Housing	Felixstowe	SCC Highways	Sustainable links to north of site. Potentially ped crossing facilities	Comment noted. Draft SHELAA identifies the site as not being available.
941	Land at Deben High School	Housing	Felixstowe	Private individual	Brownfield site more central to the town should be considered for development.	Comment noted. Site identified as potential but subject to consideration of loss of community uses, and therefore not proposed for allocation.
941	Land at Deben High School	Housing	Felixstowe	Felixstowe Town Council	Former High School, well related to the town	Identified as a potentially suitable site however is currently in use for education

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						purposes.
941	Land at Deben High School	Housing	Felixstowe	Private individual	Site much more suited for development.	Identified as a potentially suitable site however is currently in use for education purposes.
941	Land at Deben High School	Housing	Felixstowe	Felixstowe Town Council	Land at the old Deben school to provide new education facilities.	Land at Deben High School included as site 941, promoted for Housing, and is currently in use for education purposes.
941	Land at Deben High School, Garrison Lane	Housing	Felixstowe	SCC Highways	Main access onto Garrison Lane - A154	Comment noted. Site identified as potential but subject to consideration of loss of community uses, and therefore not proposed for allocation.
1023	Land at Anzani House, Anzani Avenue, Felixstowe	Housing	Felixstowe	SCC Highways	Within port area. Would require sustainable links to local amenities	Site has prior notification approval for housing under Permitted Development rights.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1091	Brackenbury Sports Centre	Not Specified	Felixstowe	Felixstowe Town Council	Could provide housing if local re-provision of leisure facilities guaranteed	Proposed for housing allocation alongside provision of new leisure centre as part of North Felixstowe Garden Neighbourhood.
1092	Eastward Ho, Grove Road	Leisure/housing/commercial	Felixstowe	Private individual	Good grade agricultural land adjacent to AONB.	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						facilities for Felixstowe. Access to be considered in relation to development of whole Garden Neighbourhood.
1092	Eastward Ho, Grove Road	Leisure/housing/commercial	Felixstowe	Private individual	No consideration appears to be given to the aesthetic appearance and the beauty of this area. This type of urban sprawl development takes no account of the impact on the area for generations to come and creates an environment no one actually wants to live in. Crossing the boundary of the A14 will lead to further infill development, once this landscape is lost it is gone forever	Consideration has been given to comments received in identifying preferred sites. The area to the north of Felixstowe is identified as a key part of the Local Plan strategy for the delivery of a Garden Neighbourhood. The area would be developed around the principles of green infrastructure and would enable provision of improved leisure facilities for Felixstowe. Access to be considered
1092	Eastward Ho, Grove Road	Leisure/housing/commercial	Felixstowe	Private individual	Areas should be sacrosanct and clearly marked as not for development of any	improved leisure facilities for Felixstowe. Access to be considered

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					kind.	in relation to development of whole Garden Neighbourhood.
1092	Eastward Ho, Grove Road	Leisure/housing/commercial	Felixstowe	SCC Highways	Access from roundabout at south western corner of site. Capacity improvements may be required to roundabout.	
335	Land at and to rear of High Trees, Oakhurst and Molen, Bucklesham Road	Housing	Foxhall	SCC Highways	No footways on Bucklesham Road	Comment noted. Whilst the site is identified as potentially suitable in the Draft SHELAA, Foxhall is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.
485	Land North & South of Bucklesham Road, IP10 0AG	Mixed	Foxhall	Private Individual	Development of this site would cause traffic issues and merge Foxhall and Bucklesham.	Comment noted. Whilst the site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability Assessment, Foxhall is
485	Land North & South of	Mixed	Foxhall	Greenways Project	Not linked to services and in prominent position.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bucklesham Road, IP10 0AG					identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside. Development of this scale in this location would not reflect the strategy of the Local Plan.
485	Land North & South of Bucklesham Road, IP10 0AG	Mixed	Foxhall	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological	Comment noted. Whilst the site is identified as potentially suitable in the Draft SHELAA, Foxhall is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					impacts.	Development of this scale in this location would not reflect the strategy of the Local Plan.
485	Land North & South of Bucklesham Road, IP10 0AG	Mixed	Foxhall	SCC Highways	It is not clear how this site would be accessed as the Bucklesham Road currently has no junction with the A12. It is unlikely that a new junction would be supported on the A14(T) or A12, due to the proximity to Seven Hills roundabout.	
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	Private individual	Exclude this site from development.	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – significant landscape and biodiversity issues.
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	Greenways Project	County Wildlife Site and TPOs. Recreation value.	
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	Private individual	This site is even more distant from local facilities	Comments noted. Site identified as not potential due to significant landscape and biodiversity
522	Foxhall Stadium, land on Foxhall	Housing, open space	Foxhall	Turnberry Planning Ltd	Site promoted by landowner for residential	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Heath				use.	constraints.
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	Suffolk Wildlife Trust	Site is within Foxhall Stadium Wood CWS and development would therefore result in a loss of CWS.	
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	Rushmere St Andrew Parish Council	Not to be developed owing to massive loss of Woodlands and open areas and loss of sporting facility. The road is not sustainable for development.	
522	Foxhall Stadium, land on Foxhall Heath	Housing, open space	Foxhall	SCC Highways	Site is currently only accessed from an Unadopted Road with poor visibility due to road alignment and would not be suitable for an intensification of use.	
765	Land North of Bucklesham Road	Retail/Office/General industry/Storage	Foxhall	Private Individual	Development of this site would cause traffic issues and merge Foxhall and Bucklesham.	Comments noted. Whilst the site is identified as potentially suitable in the Draft Strategic

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Housing and Economic Land Availability Assessment, Foxhall is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.
765	Land North of Bucklesham Road	Retail/Office/General industry/Storage	Foxhall	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted. Whilst the site is identified as potentially suitable in the Draft SHELAA, Foxhall is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.
765	Land North of	Retail/Office/General	Foxhall	Landbridge	Site promoted for mixed	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bucklesham Road	industry/Storage			use commercial development by landowner.	
977	Foxhall landfill site, Foxhall Road	Employment	Foxhall	Greenways Project	After use is supposed to be for nature conservation.	Noted, however site has been assessed as potentially suitable for employment uses albeit not proposed for allocation.
977	Foxhall landfill site, Foxhall Road, Foxhall	Foxhall landfill site, Foxhall Road, Foxhall	Foxhall	SCC Highways	Improvements to access junction onto Foxhall Road. Potentially right turn lane.	Comment noted. Site identified as potential. However, sites elsewhere in the District have been deemed more suitable for allocation to meet evidenced employment needs.
261	Land north of Kings Avenue	Housing / expansion of school grounds	Framlingham	Scott Properties	Site promoted for development.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft Strategic Housing and Economic

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Land Availability Assessment, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
393	Charnwood Field, Rose Farm, Framlingham	Housing,Retail,Business & office,Storage	Framlingham	Private individual	Site promoted by the landowner for residential use.	Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
428	land at Hill Farm, Kettleburgh Road	mixed use	Framlingham	Private individual	Object to site because it is outside of the physical limits boundary identified in the Framlingham Neighbourhood Plan, green field site, impact on settlement fringe, site is not	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					served by good road access and would impact on existing roads and junctions.	cover the period to 2036.  Highways comments addressed through the Draft SHELAA.
428	land at Hill Farm, Kettleburgh Road	Mixed use	Framlingham	SCC Highways	Footway upgrades on adjacent roads required and improved ped links to town	
526	Land fronting New Street, south of Saxtead road, Framlingham	Housing, education/primary school, public recreation, surgery & community use	Framlingham	Landbridge	Site promoted by the landowner for residential use.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
528	Land fronting New Street, south of Saxtead road, Framlingham	Housing	Framlingham	Landbridge	Site promoted by the landowner for residential use.	Now included as part of site 526.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
528	Land fronting New Street, south of Saxtead road, Framlingham	Housing	Framlingham	SCC Highways	Improvements to sustainable routes from site to town centre required	
529	Land fronting New Street, south of Saxtead road, Framlingham	Housing	Framlingham	Landbridge	Site promoted by the landowner for residential use.	Now included as part of site 526.
529	Land fronting New Street, south of Saxtead road, Framlingham	Housing	Framlingham	SCC Highways	Improvements to sustainable routes from site to town centre required	
547	Land at Dennington Road, North of Thomas Mills High School	Housing/Care Home/Education/Open Space	Framlingham	Scott Properties	Site promoted for residential use.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to
547	Land at Dennington Road, North of	Housing/Care Home/Education/Open Space	Framlingham	SCC Highways	Access from Dennington Road	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Thomas Mills High School					2036.
676	Countess Wells Pig Unit, New Road	Housing	Framlingham	SCC Highways	Site is remote from Framlingham. New Road would require significant improvement.	Comment noted. The Draft SHELAA identifies that the site is not a potential site as it is not within, adjoining, adjacent or well related to the settlement.
677	Field off B1120 on Northern Road out of Framlingham	Housing	Framlingham	Historic England	Any development on this side of the town is likely to have an adverse and harmful impact on the Great Park. Site 677 would be significantly harmful to the significance of Framlingham Castle and Framlingham Conservation Area and should not be taken forward.	Site is identified as not suitable in Draft Strategic Housing and Economic Land Availability Assessment due to potential impacts on historic environment.
677	Field off B1120 on Northern Road out of	Housing	Framlingham	Suffolk Wildlife Trust	Site is adjacent to Framlingham Mere CWS and Framlingham Mere	Comments noted. The site is not a potential site in the Draft SHELAA

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Framlingham				SWT Reserve. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	as a result of significant landscape constraints.  Highways comments are addressed through the Draft SHELAA.
677	Field off B1120 on Northern Road out of Framlingham	Housing	Framlingham	SCC Highways	Footway widening on B1120 towards town centre. Improvements to sustainable links into town centre.	
741	Coldhall Lane, Saxmundham Road	Housing	Framlingham	SCC Highways	Consideration should be given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative route to the town centre. This may mitigate the impact of the sites on the town centre.	Comment noted. The site is not a potential site in the Draft SHELAA as it is not within, adjoining, adjacent or well related to the settlement.
742	Coldhall Lane,	Housing	Framlingham	SCC	Consideration should be	Comments noted. Whilst

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Saxmundham Road			Highways	given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative route to the town centre. This may mitigate the impact of the sites on the town centre.	the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
743	Infirmery Lane, Framlingham	Housing	Framlingham	SCC Highways	Consideration should be given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative route to the town centre. This may mitigate the impact of the sites on the town centre.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
745	East of Woodbridge Road	Housing/Retail/leisure/Office/Storage	Framlingham	Private individual	Would have adverse impact on the landscape and settlement setting as this would result in	Comments noted.The site is not a potential site as it is an employment allocation

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development up and along the river valley sides to the high ground. It would also impact adversely on the gateway and rural arrival to the town from Woodbridge road, impacting on the character and identity of Fairfield road.	in the made Framlingham Neighbourhood Plan.
745	East of Woodbridge Road	Housing/Retail/leisure/Office/Storage	Framlingham	Private individual	Allocation for mixed use would allow larger employers to look at Framlingham as a possible site for investment that could provide higher value jobs as a result of increase spending in the town.	
745	East of Woodbridge Road	Housing/Retail/leisure/Office/Storage	Framlingham	SCC Highways	Consideration should be given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					route to the town centre. This may mitigate the impact of the sites on the town centre.	
746	Fairfield Road South	Housing/Retail/Leisure/Office	Framlingham	Private individual	Would have adverse impact on the landscape and settlement setting as this would result in development up and along the river valley sides to the high ground. It would also impact adversely on the gateway and rural arrival to the town from Woodbridge road, impacting on the character and identity of Fairfield road.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
746	Fairfield Road South	Housing/Retail/Leisure/Office	Framlingham	Private individual	Allocation for mixed use would allow larger employers to look at Framlingham as a possible site for investment that could provide higher value	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					jobs as a result of increase spending in the town.	
746	Fairfield Road South	Housing/Retail/Leisure/Office	Framlingham	SCC Highways	Consideration should be given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative route to the town centre. This may mitigate the impact of the sites on the town centre.	
747	Brick Lane, Framlingham	Housing/Holiday Accommodation/Office	Framlingham	Private individual	Local Plan should look to reuse the site and create some new residential units and holiday accommodation to support tourism in the District.	Comment noted. The site Draft SHELAA identifies the site as not a potential site as it is not within, adjoining, adjacent or well related to a settlement.
748	Cole's Green, Brick Lane	Housing/Holiday Accommodation/Office	Framlingham	Private individual	Local Plan should look to reuse the site and create some new residential units and holiday	Comment noted. The Draft SHELAA identifies the site is not a potential site as it is not within,

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					accommodation to support tourism in the District.	adjoining, adjacent or well related to a settlement.
749	Brick Lane, Framlingham	Housing/Primary School	Framlingham	Private individual	Would have adverse impact on the landscape and settlement setting as this would result in development up and along the river valley sides to the high ground. It would also impact adversely on the gateway and rural arrival to the town from Woodbridge road, impacting on the character and identity of Fairfield road.	Comments noted. Whilst the site is identified as a potentially suitable site in the Draft SHELAA, the Council would expect a future review of the Neighbourhood Plan to cover the period to 2036.
749	Brick Lane, Framlingham	Housing/Primary School	Framlingham	Private individual	Allocation for mixed use would allow larger employers to look at Framlingham as a possible site for investment that could provide higher value jobs as a result of increase	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					spending in the town.	
749	Brick Lane, Framlingham	Housing/Primary School	Framlingham	SCC Highways	Consideration should be given to whether these sites (741-9) could link between Fairfield Road and Saxmundham Road, thus providing an alternative route to the town centre. This may mitigate the impact of the sites on the town centre.	
942	Lucarne, Fore St	Housing	Framlingham	Private individual	Intention that land continues to be used as allotments, only other option potential option would be an extension to the cemetery. Do not agree with the designation of the site for residential uses.	Comment noted. Site identified as not available through the Draft SHELAA.
1033	Land opposite 25-33 New Road, Framlingham	Housing	Framlingham	Suffolk Wildlife Trust	Site is adjacent to Framlingham Mere CWS and Framlingham Mere SWT Reserve. Further	Comment noted. The site has been identified as not potential due to site size below the 0.2ha

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	threshold.
1050	Land at and behind 115 College Road, Framlingham	Housing	Framlingham	SCC Highways	Improvements to local sustainable routes to town centre	Comment noted. The Draft SHELAA identifies the site as not available.
496	Land at Grove Road Friston	Housing	Friston	Brown & Co	Site promoted by landowner for residential use with plots gifted to Alde & Ore Estuary Partnership to facilitate continued upgrading and maintenance of flood defences.	Comments noted. The site is identified as a potential site. However, Friston is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.
496	Land at Grove Road Friston	Housing	Friston	Savills	Site submitted from the centre of the village and its facilities. Development on this site would encroach on the countryside.	
548	land South of	Housing	Friston	Blackheath	Land promoted for	Site has been discounted

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Snape Road			Estate	development	as it is not within, adjoining or well related to the form of the settlement.
548	land South of Snape Road	Housing	Friston	SCC Highways	Footway and ped crossing om B1069 required	Comments addressed through draft SHELAA.
550	Land West of Saxmundham Road, Friston	Housing/Open Space	Friston	Savills	Site promoted by landowner for residential use	Comments noted. The site is identified as a potential site. However,
550	Land West of Saxmundham Road, Friston	Housing/Open Space	Friston	SCC Highways	Improvements to footway on B1121 required	Friston is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside.
876	Land to the rear of Orchard Bank, Church Road	Housing	Friston	Savills	Site in close proximity to Listed Buildings and therefore any development on this site would need to mitigate any negative impact on these buildings.	Comment noted. Site identified as not available in Draft SHELAA.
6	Land adj to Ivy	Housing	Great	Artisan PPS	Site promoted by	Comment noted. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Cottage, Boot Street		Bealings	td	landowner for residential use	site has been identified as not potential in the Draft SHELAA as it is below the size threshold for allocation within the First Draft Local Plan. Furthermore, the Council supports the Neighbourhood Plan as the mechanism for delivering further development in alignment with the countryside policies in the Draft Local Plan.
635	Land at Kiln Farm, Kiln Lane	Housing	Great Bealings	Artisan PPS td	Site promoted by landowner for residential use	Comment noted. The site has been identified as not potential in the
635	Land at Kiln Farm, Kiln Lane	Housing	Great Bealings	Suffolk Wildlife Trust	Site is adjacent to Kiln Farm Meadow CWS. Further assessment is required to determine whether development in this	Draft SHELAA. Furthermore, the Council supports the Neighbourhood Plan as the mechanism for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					location is likely to result in an adverse impact on this site.	delivering further development in alignment with the countryside policies in the Draft Local Plan.
1064	Land at and around Sandpit Cottages, Low Road	Housing	Great Glemham	SCC Highways	Lack of footways on adjacent roads. Narrow roads unlikely to be able to accommodate traffic from this level of development.	Comment noted. Comments addressed through Draft SHELAA.
24	Land at recreation ground South of Post Mill Orchard and Post Mill Close	Recreation	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
24	Land at recreation ground South of Post Mill Orchard and Post Mill Close	Recreation	Grundisburgh	Grundisburgh Parish Council	Not suitable	
56	Land at and	Housing	Grundisburgh	Private	Not suitable	Comments noted. Site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	surrounding 22-24 Stoney Road			individual		1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
56	Land at and surrounding 22-24 Stoney Road	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
56	Land at and surrounding 22-24 Stoney Road	Housing	Grundisburgh	Private individual	I would support development in plot 56	Comment noted. Site identified as not available in Draft SHELAA.
57	Land at and surrounding 26 Stoney Road	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
57	Land at and surrounding 26 Stoney Road	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
57	Land at and surrounding 26 Stoney Road	Housing	Grundisburgh	Private individual	I would support development in plot 57	Comment noted. Site identified as not available in Draft SHELAA.
127	land between the Street and Meeting Lane	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						identified as potentially suitable however not preferred for allocation.
127	land between the Street and Meeting Lane	Housing	Grundisburgh	Private individual	Grundisburgh allotments are a valuable asset to the villagers of Grundisburgh, particularly those with no opportunity to grow vegetables and fruit at home.	Comment noted. Site identified as not available in Draft SHELAA.
268	Land south of Half Moon Lane	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
268	Land south of Half Moon Lane	Housing	Grundisburgh	Private individual	Not suitable	
268	Land south of Half Moon Lane	Housing	Grundisburgh	Private individual	I would support development in plots 268	Comment noted. Site identified as not available in Draft SHELAA.
268	Land south of Half Moon Lane	Housing	Grundisburgh	Private individual	Register objections in terms of character, outside of village envelope, recent	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					upheld appeal decision, single track road, lack of pavements and any development would result in creep into rural areas and should not be permitted.	
268	Land south of Half Moon Lane	Housing	Grundisburgh	Artisan PPS Ltd	Site promoted by landowner for residential use	
268	Land south of Half Moon Lane	Housing	Grundisburgh	SCC Highways	Widening of Half Moon Lane required plus footway links to village amenities	
283	Land rear of The Gables, The Green, Grundisburgh, IP13 6TA	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
283	Land rear of The Gables, The Green, Grundisburgh, IP13 6TA	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
283	Land rear of The	Housing	Grundisburgh	Private	Area of woodland close to	Comment noted. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Gables, The Green, Grundisburgh, IP13 6TA			individual	centre of village in an important wildlife corridor and within the Conservation Area.	site is not potential due to significant access constraints.
351	Land west of Chapel Road	Housing	Grundisburgh	Private individual	Land promoted for development	Comments noted. Site has been identified as potential. However, site 1119 has been deemed a more suitable site for allocation due to better connectivity with services and facilities in the village.
351	Land west of Chapel Road	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
351	Land west of Chapel Road	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
351	Land west of Chapel Road	Housing	Grundisburgh	Strutt & Parker	Site promoted by landowner for residential use	Comments noted. Site has been identified as potential. However, site 1119 has been deemed
351	Land west of	Housing	Grundisburgh	Private	Register objections in terms	1119 has been deemed

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Chapel Road			individual	of character, outside of village envelope, recent upheld appeal decision, single track road, lack of pavements and any development would result in creep into rural areas and should not be permitted.	a more suitable site for allocation due to better connectivity with services and facilities in the village.
351	Land west of Chapel Road	Housing	Grundisburgh	SCC Highways	No footways on Park Road or Chapel Road - required	
560	Land to the East of Woodbridge Road	Housing, Open Space	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
560	Land to the East of Woodbridge Road	Housing, Open Space	Grundisburgh	Grundisburgh Parish Council	Not suitable	
643	The Bungalow, Meeting Lane	Housing	Grundisburgh	Private individual	I would support development in plots 643.	Comment noted. Site identified as not available in Draft SHELAA.
643	The Bungalow, Meeting Lane	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Grundisburgh have been identified as potentially suitable however not preferred for allocation.
786	Land between the Old Police House and Park View, Park Road	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in Grundisburgh have been identified as potentially suitable however not preferred for allocation.
786	Land between the Old Police House and Park View, Park Road	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
1119	Land to the west of Ipswich Road, Grundisburgh	Housing	Grundisburgh	Private individual	Not suitable	Site 1119 is identified as a preferred site. The policy SCLP12.48 requires a mix of housing and for development to be sympathetic to the setting of Grundisburgh Hall Park.
1119	Land to the west of Ipswich Road, Grundisburgh	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
1133	Land to the east of Woodbridge Road,	Housing	Grundisburgh	Private individual	Not suitable	Comments noted. Site 1119 is identified as a preferred site. Others in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Grundisburgh					Grundisburgh have been identified as potentially suitable however not preferred for allocation.
1133	Land to the east of Woodbridge Road, Grundisburgh	Housing	Grundisburgh	Grundisburgh Parish Council	Not suitable	
207	Land opposite Hacheston Lodge, The Street	Housing	Hacheston	Hacheston Parish Council	Highways issues, close to Special Landscape Area, possibly of archaeological significance, barn owls are present.	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
266	Land in between 12 and 14 Main Road	Housing	Hacheston	Hacheston Parish Council	No objections from residents. Is the site required? Development consistent with current housing format may be appropriate.	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
467	Land fronting east side of The Street, Hacheston	Housing	Hacheston	Hacheston Parish Council	High pressure gas pipeline runs through the site. Could be highways issues. Out of character with the village. 5 houses may be acceptable, if developed alongside SSP9.	Comments noted. Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment however due to its

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						location in the sensitive river valley landscape other sites in the District were considered preferable for allocation.
467	Land fronting east side of The Street, Hacheston	Housing	Hacheston	Private individual	Essential for the well being of the community and local wildlife that a balance is maintained between open spaces, residential and business development. Object to development on this site due to amount of development in the village, impact on views across river valley and ecological impact on wildlife.	Comments noted. Site identified as potentially suitable in Draft SHELAA however due to its location in the sensitive river valley landscape other sites in the District were considered preferable for allocation.
467	Land fronting east side of The Street, Hacheston	Housing	Hacheston	Private individual	Object to development due to impact on landscape and views, noise and pollution and important to retain green spaces to offer rural feeling.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
467	Land fronting east side of The Street, Hacheston	Housing	Hacheston	East Coast Planning Services Ltd	Site promoted by landowner for residential use	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Object to site being developed due to issues related flooding, traffic, services,	Site identified as potentially suitable in Draft Strategic Housing and Economic Land
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Hacheston Parish Council	Issues identified include related to highways, loss of agricultural land, visibility of site from footpaths and Special Landscape Area, overlooking, development wouldn't be in keeping with ribbon development. Other sites in Hacheston don't have such issues.	Availability Assessment however due to access issues other sites in the District are considered to be preferable for allocation.
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Site previously rejected due to highways, minimal verge width, overlooking properties and volume of traffic on B1116. Site is	Site identified as potentially suitable in Draft SHELAA however due to access issues other sites in the District

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					currently a productive arable field and development will cause loss of high quality agricultural land.	are considered to be preferable for allocation.
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Site previously rejected due to highways, minimal verge width, overlooking properties and volume of traffic on B1116 and no footpaths. Appreciated that growth is needed and suggest scoring system introduced by Babergh/Mid Suffolk to assess facilities in each village.	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Site is higher than B1116, currently used for farming, land already floods due to heavy rain. Building houses on this site will only increase flooding and previous rejection by	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Council shows that the site is unsustainable.	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Site is elevated above B1116, increased traffic levels on B1116, no convenience store or bus service in Hacheston and limited employment opportunities in the village.	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Strongly object to the site, land is elevated, adjacent properties already subject to flooding, no facilities in the village.	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	East Coast Planning Services Ltd	Site promoted by landowner for residential use	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Strongly object to this site because of traffic issues in the village, loss of productive farmland, outside of the physical limits boundary within the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Special Landscape Area.	
652	Land opposite 2 Low Meadows, The Street	Housing	Hacheston	Private individual	Object to any development in this location, loss of green space and views across the river valley, as well as ecological impact of such development.	
646	Land South of Grundisburgh Road, Hasketon	Housing	Hasketon	Private individual	Any further development on outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists visiting the area.	Comments noted. The site is identified as not a potential site in the Draft SHELAA as it is not within, adjoining, adjacent or well related to the built form of a settlement.
646	Land South of Grundisburgh Road, Hasketon	Housing	Hasketon	Woodbridge Town Council	Proposal is inappropriate development.	
646	Land South of Grundisburgh Road, Hasketon	Housing	Hasketon	Woodbridge Society	Should not be developing west of the A12.	
646	Land South of Grundisburgh Road, Hasketon	Housing	Hasketon	SCC Highways	Site is remote from Hasketon and Woodbridge. Significant investment required to provide	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sustainable links to amenities.	
35	Land adj. to Beechview, Rectory Road	Housing	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, within the AONB where livestock farming is undertaken, flooding, encroachment of biodiversity and geodiversity, narrow access.	Comments, particularly in relation to access, reflected in the site not being proposed for allocation in the Draft Local Plan. Comments noted.
35	Land adj. to Beechview, Rectory Road	Housing	Hollesley	Private individual	Loss of green space, crowding.	
35	Land adj. to Beechview, Rectory Road	Housing	Hollesley	Private individual	Rejected previously because of access.	
35	Land adj. to Beechview, Rectory Road	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
35	Land adj. to Beechview, Rectory Road	Housing	Hollesley	Private individual	Any development of more than 10 dwellings in the AONB would need to be	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					justified as being of “national interest”.	
69	Land adjacent to 8 Carlton Road	Housing	Hollesley	Hollesley Parish Council	This land already has planning permission for one house, which is in the process of being built, therefore this plot should be removed from the plan	Comments noted. Site removed from assessment as now has permission.
69	Land adjacent to 8 Carlton Road	Housing	Hollesley	Private individual	Site is not suitable for development due to access and sightline.	
69	Land adjacent to 8 Carlton Road	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
69	Land adjacent to 8 Carlton Road	Housing	Hollesley	Private individual	Not fit for any purpose, no bus service, sewage system is not coping, water pressure is inadequate, flooding is disruptive and dangerous to existing community.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
69	Land adjacent to 8 Carlton Road	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
96	Land adjacent to 8 Carlton Road	Housing	Hollesley	Private individual	Access, inappropriate location for business.	
264	Land at Lyndhurst, Rectory Road	Housing	Hollesley	Hollesley Parish Council	Enhancement of biodiversity and geodiversity, area of historic importance.	Site identified as unsuitable in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
264	Land at Lyndhurst, Rectory Road	Housing	Hollesley	Private individual	Loss of green space, crowding.	
264	Land at Lyndhurst, Rectory Road	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
264	Land at Lyndhurst, Rectory Road	Housing	Hollesley	Private individual	Rejected previously because of access.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
272	Land surrounding Meadow Park Livery, Alderton Road	Affordable Housing, Employment, Tourism	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, within the AONB where livestock farming is undertaken, flooding, encroachment of biodiversity and geodiversity, narrow access.	Comments noted. Site removed from assessment as now has permission.
272	Land surrounding Meadow Park Livery, Alderton Road	Affordable Housing, Employment, Tourism	Hollesley	Private individual	Site is not suitable for development due to access and sightline.	
272	Land surrounding Meadow Park Livery, Alderton Road	Affordable Housing, Employment, Tourism	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
272	Land surrounding Meadow Park Livery, Alderton Road	Affordable Housing, Employment, Tourism	Hollesley	Private individual	Not fit for any purpose, no bus service, sewage system is not coping, water pressure is inadequate, flooding is disruptive and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					dangerous to existing community.	
272	Land surrounding Meadow Park Livery, Alderton Road	Affordable Housing, Employment, Tourism	Hollesley	Private individual	Proposal should be dismissed.	
323	Land west of Manor Farm	Camp site	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, access is via a single unmade track, prime agricultural land and one of a few areas where people can experience wilderness.	
323	Land west of Manor Farm	Camp site	Hollesley	RSPB	We raise particular concerns about the proposed allocation of a camp site at site 323, given that this is directly bordered on three sides by the Sandlings SPA.	
323	Land west of Manor Farm	Camp site	Hollesley	Private individual	Do not support this site for development and support	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the Parish Council submission.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, regularly floods and site is only accessed via a track which is unsuitable for emergency vehicles.	Whilst the site is identified as potentially suitable through the SHELAA methodology, these issues have been considered through the SHELAAA. Site not proposed for allocation due to access issues in particular.
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Site is not suitable for development due to access and sightline.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Site not suitable as the land is liable to subsidence and becoming blocked, single	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					track unsuitable for traffic, adjacent to Local Nature Reserve, part of the heritage of the village.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Village suffers from both tidal and surface rainwater flooding. Sites which are impacted or cause more severe flooding should be avoided.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Site rejected because of flood zone.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Would encroach on area which has always been a haven for wildlife. Traffic from these sites would require development of the track to Meadow Farm.	
398	land at Meadow Farm, Meadow Farm Lane	Housing	Hollesley	Private individual	Access, inappropriate location for business.	
443	Land east of	Housing	Hollesley	Landowner	Land promoted for	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Fourways, Alderton Road			/ agent	development	however in the Draft Strategic Housing and Economic Land Availability Assessment the site has been discounted as it is not within, adjoining or well related to the form of the settlement.
443	land east of Fourways, Alderton Road	Housing	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, not accessible via road and access is dangerous, area of wildlife habitats and poorly integrated with the main village.	Comments noted. The site been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
443	land east of Fourways, Alderton Road	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
443	land east of Fourways, Alderton Road	Housing	Hollesley	Private individual	No access, an untrodden nature reserve and already recently rejected.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
443	land east of Fourways, Alderton Road	Housing	Hollesley	Private individual	believe this site would be totally unsuitable for development as the access to it is via a narrow single lane dirt track which is not suitable for large vehicles and could not cope with the addition of more vehicles as it already gets	
443	land east of Fourways, Alderton Road	Housing	Hollesley	Private individual	Plot was purchased as an investment. It has not been used in any significant way by the owner who does not live in the village. The access to the highway is a narrow unmade track and the exit is obscured by land belonging to others and is hazardous as a consequence. It is unsuitable for development.	
466	The Orchard,	Housing	Hollesley	Hollesley	Site is outside of the	Comments noted. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	School lane Hollesey. (off Hollesey school drive)			Parish Council	physical limits boundary, trees and hedges on the site may be of biodiversity value, site is accessible via a single track which may not be suitable to accommodate development.	site is not a potential site due to significant access constraints.
466	The Orchard, School lane Hollesey. (off Hollesey school drive)	Housing	Hollesey	Private individual	Do not support this site for development and support the Parish Council submission.	
466	The Orchard, School lane Hollesey. (off Hollesey school drive)	Housing	Hollesey	Private individual	Access, sightline, oversized development, and already recently refused.	
466	The Orchard, School lane Hollesey. (off Hollesey school drive)	Housing	Hollesey	Private individual	Site could be considered for a small hub for high-tech businesses.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, partially within flood zone, accessible via a single track road and borders an area where a rare moth nesting has been recorded.	Comments reflected in the site not being proposed for allocation for development in the local plan.
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Access, sightline, oversized development	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Unacceptable, would be a large development on greenfield site.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Plan for proposed development is not in any way fit for purpose.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Development of this site would destroy a large area of beauty outside of village boundary. Rejected previously because it is poorly related to existing settlement. Access crosses a flood zone and can be cut off in tidal flooding.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Register strong objections to this site, area not suitable for large volumes of traffic, village is prone to power cuts.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Development of this site would destroy a large area of beauty outside of village boundary. Rejected previously because it is poorly related to existing settlement. Access crosses a flood zone and can be cut off in tidal flooding.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Development would completely destroy a large area of natural beauty and wildlife habitat outside of the village boundary.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	All sites would encroach on an area that is a haven for wildlife.	
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Highly restricted access and cause mass environmental destruction	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
477	Meadow Park Livery Stables, Alderton Road, IP12 3RQ	Housing	Hollesley	Private individual	Access, Inappropriate location for business.	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Hollesley Parish Council	Site outside of physical limits boundary, small portion of the site is at risk from flooding, trees and hedges have great biodiversity value, site would bring unwanted street lights and noise to a quiet area of the village.	Comments noted. Whilst the site is identified as a potential site in the SHELAA it is not proposed for allocation in particular due to landscape impact.
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Private individual	Oversized development.	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Private individual	Particularly unacceptable, in our view, would be large developments on greenfield	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sites in the surrounding agricultural land	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	Private individual	Could be considered is the number of houses was 20, but with sound ecological sustainable design.	
532	Land fronting Rectory road, Hollesley	Housing, open spaces	Hollesley	SCC Highways	Footway extension on Rectory road required	
542	Tower House, Tower Hill Road	Housing	Hollesley	Hollesley Parish Council	Site outside of the physical limits boundary, large portion of the site at risk of flooding, wildlife corridor, and access of a tight and awkward junction.	Comments noted. Whilst the site is identified as a potential site in the SHELAA it is not proposed for allocation in particular due to landscape impact.
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					submission.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Access, overcrowding.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Site is unsuitable because of a high risk of surface water flooding.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Rejected previously because of access.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Register strong objections to this site, area not suitable for large volumes of traffic, village is prone to power cuts	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Site not compatible with AONB, provides valuable wildlife corridor, high risk of surface water flooding and access is already congested,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					narrow and problematic.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Site is a risk of surface water flooding, high wildlife value and access is not wide enough for two cars to pass.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Access to this site would probably be onto Tower Hill which would require a junction having very limited visibility.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Site prone to flooding, full of beautiful trees, teeming with wildlife and prone to flooding.	
542	Tower House, Tower Hill Road	Housing	Hollesley	Private individual	Area prone to flooding, full of fantastic trees and teeming with wildlife. Site access is restricted and would require mass destruction of superb environment.	
563	Land opposite	Housing	Hollesley	Hollesley	Outside of the physical	Comments noted. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Moorlands, Hollesley			Parish Council	limits boundary, vulnerable to flooding, close to special protection area, haven for wildlife.	site's proximity to a Special Protection Area for Wild Birds is particularly significant to the site not being proposed for allocation for development.
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	If the day comes that the village needs more homes, these sites could be looked at in detail, but only for starter / downsizer housing to retrieve the village balance.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Large developments on greenfield sites in the surrounding agricultural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					land would be unacceptable.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Would be possible if the (fewer) housing was affordable, ecologically designed and carefully sited back from the road;	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	AONB views any development of more than 10 housing in this area would need to be justified as being of national interest.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Access to the site would either be at a dangerous corner with very limited visibility.	
563	Land opposite Moorlands, Hollesley	Housing	Hollesley	Private individual	Site could be considered for a small hub for high-tech businesses.	
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Hollesley Parish Council	Outside of the physical limits boundary, site is currently used for farmland,	Comments noted. Whilst the site is identified as a potential site in the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					parts of the site at risk from flooding, trees and hedges in the area are of biodiversity value.	SHELAA it is not proposed for allocation in particular due to landscape impact.
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Private individual	If the day comes that the village needs more homes, these sites could be looked at in detail, but only for starter / downsizer housing to retrieve the village balance.	
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Private individual	Large developments on greenfield sites in the surrounding agricultural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					land would be unacceptable.	
567	Land East of Rectory Road, Hollesley	Housing	Hollesley	Private individual	In the much longer term, sites that could be considered are 567 if designated as an exception site with fewer houses;	
761	Land to the West of Duck Corner	Housing	Hollesley	Hollesley Parish Council	Outside of the physical limits boundary, in agricultural use, part of the site at risk from flooding and would change the character of the village.	Comments noted. Whilst the site is identified as a potential site in the SHELAA it is not proposed for allocation in particular due to landscape impact.
761	Land to the West of Duck Corner	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
761	Land to the West of Duck Corner	Housing	Hollesley	Private individual	Ribbon development destroying the village's character	
761	Land to the West of Duck Corner	Housing	Hollesley	Private individual	Ribbon development such as site 761 is also unacceptable , creating a	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					precedent for future sprawl.	
761	Land to the West of Duck Corner	Housing	Hollesley	Private individual	AONB views any development of more than 10 housing in this area would need to be justified as being of national interest.	
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	Housing	Hollesley	Hollesley Parish Council	Site is located close to known habitats of protected species, close to a Grade II Listed building.	The site is identified in the Draft SHELAA as not being made available for consideration in the Draft Local Plan.
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	Housing	Hollesley	Private individual	Overcrowding, Access, Inappropriate location for business	
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	Housing	Hollesley	Private individual	Access is very small and difficult to enter is another car is waiting to exit. More	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hill				housing means there will be more children crossing the road.	
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	Housing	Hollesley	Private individual	Roads on the peninsula are not adequate, no bus service, sewerage system is not coping, water pressure is poor, important routes get flooded and any more development will destroy the community.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Hollesley Parish Council	Site is outside of the physical limits boundary, site located close to known habitats of protected species, access is via a single track and close to private nature reserve.	Draft SHELAA identifies the site as not being available.
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
939	Orchard	Housing	Hollesley	Private	Overcrowding, Access.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Cottage, Stebbing Lane			individual		
939	Orchard Cottage, Stebbing Lane	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
939	Orchard Cottage, Stebbing Lane	Housing	Hollesley	Private individual	Site would be reached by a poorly surfaced track, not wide enough for two cars. A high density development would be out of keeping with the character of the village and the AONB.	
939	Orchard Cottage, Stebbing Lane	Housing	Hollesley	Private individual	Register strong objections to this site, area not suitable for large volumes of traffic, village is prone to power cuts	
939	Orchard Cottage, Stebbing Lane	Housing	Hollesley	Private individual	Site would be reached by a poorly surfaced track, not wide enough for two cars. A high density development	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					would be out of keeping with the character of the village and the AONB.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	High-density development of this site would have a detrimental effect on this AONB in terms of scenic beauty and wildlife habitat and to the enjoyment of the view by passing users of the adjacent bridleway.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	High-density development of this site would have a detrimental effect on this AONB in terms of scenic beauty and wildlife habitat and to the enjoyment of the view by passing users of the adjacent bridleway.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	Access to this site could only be via Stebbings Lane which at this point is no more than a single lane	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					track, often used by pedestrians and quite unsuited to additional traffic.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	Site 939 at Orchard Cottage, Stebbings Lane would cause massive access issues as it is situated off a narrow privately owned track and would involve also destruction of wildlife and trees on a huge scale.	
939	Orchard Cottage, Stebbings Lane	Housing	Hollesley	Private individual	Site 939 at Orchard Cottage, Stebbings Lane would cause massive access issues as it is situated off a narrow privately owned track and would involve also destruction of wildlife and trees on a huge scale.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Hollesley Parish Council	Site outside of the physical limits boundary, part at risk from flooding, site is useful	Draft SHELAA identifies the site as not being available.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					as an area of open space, not easily accessible, site adjacent to woodland which is a habitat for varied wildlife.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Do not support this site for development and support the Parish Council submission.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Far too large for the village to cope with under any foreseeable circumstance.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about developing it.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	A site of this magnitude could not be considered to be compatible with the Suffolk Coast and Heaths AONB and the National Planning Policy Framework.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Site is not easily accessed and roads would need significant development.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Register strong objections to this site, area not suitable for large volumes of traffic, village is prone to power cuts	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Site is unsuitable for development now or in the near future.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Site is in continual agricultural use, clearly visible within the AONB and would need significant road widening.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Site is in continual agricultural use, clearly visible within the AONB and would need significant road widening.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Site is prime farmland and adjacent to woodland.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hollesley				Development would be overwhelming for the village.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Any further development to be restricted to small, sensitive infill sites close to the village centre.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Access is narrow and a dangerous pinch point on the main road. Additional units would stretch some local resources.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	As the UK exits Europe, it should be striving to increase its own production of food not seeking to concrete over fecund arable land.	
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	Private individual	Prime agricultural land and access is a narrow country footpath.	
1025	Land north of Stebbing's Lane,	Housing	Hollesley	Private individual	Prime agricultural land and access is a narrow country	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hollesley				footpath.	Draft SHELAA identifies the site as not being available.
1025	Land north of Stebbing's Lane, Hollesley	Housing	Hollesley	SCC Highways	Bushey Lane unlikely to be able to accommodate traffic flows of development without significant improvement	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Hollesley Parish Council	Site outside of the physical limits boundary, partially in flood zone 2, potential for archaeological finds, site is accessed via a narrow road, prime agricultural land which should remain.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Already partially built on and many problems caused. The lane has no passing places or possibility of them, hence access cannot be achieved.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Site is agricultural land and green field site. Would be environmental vandalism to even think about	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					developing it.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Village suffers from both tidal and surface water flooding and more development would cause more severe flooding.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Suffolk Coast and Heaths AONB views any development of more than 10 dwellings in this area to be detrimental to our AONB and would need to be justified as being of 'national interest'	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	To allow further building in or around the village, unless this is restricted to small, sensitive infill sites close to the village centre, would, we believe, have a detrimental effect on the village - increasing traffic on the main street	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Access is along an narrow lane which has no possibility of being widened.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Suffolk Wildlife Trust	Site is adjacent to Black Ditch Meadows CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Portion of this plot is farmland, hazardous road junctions.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Roads on the peninsula are not adequate, no bus service, sewerage system is not coping, water pressure is poor, important routes get flooded and any more development will destroy the community.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Formally register objections to the site because of highway access, geography and wildlife,.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	Private individual	Register strong objection because lane is narrow with infrequent passing places, regularly floods and infrastructure is not capable of supporting further development.	
1026	Land north of Bushey Lane, Hollesley	Housing	Hollesley	SCC Highways	Tower Hill and Stebbings Lane unlikely to be able to accommodate traffic flows of development without significant improvement	
65	Land north of White Gables, Main Road	Housing	Kelsale cum Carlton	Private individual	It should be noted that the land is low lying and attention would have to be given to the possibility of flooding, especially as the existing fields currently absorb excess rainfall.	Comments noted. The site is only considered to be well related to the form of the settlement only if considered with site 239, however 239 not available.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
120	Main Road	Housing	Kelsale cum Carlton	Private individual	Although somewhat isolated, the land does have the advantage of being directly on the A12, making access easier. We would prefer there to be no further holiday homes in the area as there are already several large caravan/lodge parks.	The site been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
239	Land north of Belvedere Close	Housing	Kelsale cum Carlton	Private individual	It should be noted that the land is low lying and attention would have to be given to the possibility of flooding, especially as the existing fields currently absorb excess rainfall.	Comments noted. The Draft SHELAA identifies the site as not being available.
287	Land east of Benstead, Main Road	Housing or Holiday lets	Kelsale cum Carlton	Private individual	Although somewhat isolated, the land does have the advantage of being directly on the A12, making access easier. We would prefer there to be no	Comments noted however the site been identified as not suitable through the Draft Strategic Housing and Economic Land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					further holiday homes in the area as there are already several large caravan/lodge parks.	Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
326	Land south of Bankside, Dorleys Corner	Housing	Kelsale cum Carlton	Private individual	Access would be on to an exceedingly narrow lane	Comments noted however the site been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
363	Land north of Park Farm House	Housing	Kelsale cum Carlton	Private individual	It seems that these plots would access onto Rosemary Lane, which is another narrow, winding lane and to support the numbers of extra inhabitants huge amounts	Comments noted. The Draft SHELAA identifies the site as not being available.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					of further facilities would be required	
450	Land Adj. Mill Farm, Rosemary Lane IP17 2QS	Housing	Kelsale cum Carlton	Private individual	It seems that these plots would access onto Rosemary Lane, which is another narrow, winding lane and to support the numbers of extra inhabitants huge amounts of further facilities would be required	Comments noted. The site is identified as a potential site. However, the Council supports the Neighbourhood Plan as the mechanism for delivering further development to the existing Local Plan allocation SCLP12.49.
450	Land Adj. Mill Farm, Rosemary Lane IP17 2QS	Housing	Kelsale cum Carlton	SCC Highways	Provision of footway along Carlton road. Potential A12 junction safety improvement required in conjunction with other sites	
458	Land South & East Cherry Tree Cottage, Curlew Green	Housing	Kelsale cum Carlton	Private individual	Concerned about development on this site due to proximity of listed building, ecological value of site, stretched facilities in Saxmundham, volume of traffic.	Comments noted. The site is identified as not potential as it is not within, adjacent, adjoining or well related to a settlement and therefore, has not been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
458	Land South & East Cherry Tree Cottage, Curlew Green	Housing	Kelsale cum Carlton	Private individual	If this site were developed, it would seem likely that many more than the proposed eight dwellings would be imposed.	considered for allocation.
458	Land South & East Cherry Tree Cottage, Curlew Green	Housing	Kelsale cum Carlton	Private individual	Development on this site would be devastating for the area, destroying wildlife and ancient woodlands.	
487	Land adjacent to FirTrees, Rosemary Lane	Housing	Kelsale cum Carlton	Private individual	It seems that these plots would access onto Rosemary Lane, which is another narrow, winding lane and to support the numbers of extra inhabitants huge amounts of further facilities would be required	Comment noted. The site has been identified as a potential site albeit that access issues would need to be resolved. The Council supports the Neighbourhood Plan as the mechanism for delivering further development to the existing Local Plan allocation SCLP12.49.
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Development would destroy wildlife habitats,	Comments noted. The site has been identified

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					road access would be dangerous and drainage of rainwater.	as not potential as it is not within, adjoining, adjacent or well related to a settlement.
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Any building on this plot would suffer from access problems as the site is on a hill. Any commercial/recreational/public building would need to have more than adequate parking facilities.	
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Development on this site would be devastating for the area, destroying wildlife and ancient woodlands.	
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Site not suitable for development, raised piece of land, no mains drainage.	
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Site not suitable due to raised land, narrow lanes to access the site, ambiguity over mixed use is a concern. Any buildings	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					could leave to overlooking of existing properties.	
570	Land at Main Road, Kelsale	Housing/community use	Kelsale cum Carlton	Private individual	Mixed use is too vague – more detail is needed. Concern about access to the site and noise from increased vehicle activity.	
1020	Land adjacent to Pear Tree Close, Kelsale cum Carlton	Housing	Kelsale cum Carlton	SCC Highways	Link to footway along Carlton road. Potential A12 junction safety improvement required in conjunction with other sites	Comment noted. Site identified as a potential site. However, coalescence of Kelsale and Carlton has been identified as an issue. The Council supports the Neighbourhood Plan as the mechanism for delivering further development to the existing Local Plan allocation SCLP12.49.
64	Bracken Hall, Main Road	Housing	Kesgrave	Private individual	Exclude this site from development	Site identified as unavailable in SHELAA
64	Bracken Hall,	Housing	Kesgrave	Private	Greenfield Land – Not	Comment noted. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Main Road			individual	Sustainable Locations	site is not a potential site due to significant landscape constraints and availability.
174	land off Main Road, opposite Bracken Avenue	Housing	Kesgrave	Private individual	Exclude this site from development	Site not identified as potential site in SHELAA due to issues relating to TPOs covering much of the site plus issues related to impact on protected species and SSSI.
174	land off Main Road, opposite Bracken Avenue	Housing	Kesgrave	Private individual	Greenfield Land – Not Sustainable Locations	Comment noted. The site is not a potential site due to significant biodiversity constraints as noted in the comments.
174	land off Main Road, opposite Bracken Avenue	Housing	Kesgrave	Suffolk Wildlife Trust	Site is within Kesgrave Wood and Sinks Valley CWS and development would therefore result in a loss of CWS	
174	land off Main Road, opposite Bracken Avenue	Housing	Kesgrave	SCC Highways	Footway widening required	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
339	Land at and surrounding 306 Main Road	Housing	Kesgrave	Private individual	Exclude this site from development	Site identified as not potential in the Draft Strategic Housing and Economic Land Availability Assessment due to resulting in the loss of County Wildlife Site.
339	Land at and surrounding 306 Main Road	Housing	Kesgrave	Land owner / agent	Land promoted for development	
339	Land at and surrounding 306 Main Road	Housing	Kesgrave	Private individual	Greenfield Land – Not Sustainable Locations	The site is identified as not potential in the Draft SHELAA due to resulting in loss of a County Wildlife Site.
339	Land at and surrounding 306 Main Road	Housing	Kesgrave	Suffolk Wildlife Trust	Site is within Kesgrave Wood and Sinks Valley CWS and development would therefore result in a loss of CWS	
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Historic England	Scheduled monuments to the east of the site, consideration needs to be given to their setting.	Comments noted however the site is not proposed for allocation through the Local Plan as the strategy does not focus growth on the east edge of Ipswich.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Historic England	Exclude this site from development	Comments noted however the site is not proposed for allocation through the Local Plan as the strategy does not focus growth on the east edge of Ipswich.
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Historic England	Land promoted for development.	The site is identified as potentially suitable in the SHELAA. However development of this scale would be contrary to the strategy for the Local Plan which seeks to focus strategic scale development in Felixstowe and Saxmundham alongside provision of infrastructure. Alternative strategies are considered in Appendix A Alternative

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Policies of the First Draft Local Plan.
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Historic England	In strategically important Foxhall Rd corridor. Essential to create wide and effective public and wildlife corridor and maintain open character. Old radio masts should be retained.	Comments noted however the site is not proposed for allocation through the Local Plan as the strategy does not focus growth on the east edge of Ipswich.
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Private individual	Greenfield Land – Not Sustainable Location. Recent appeal on this land was defeated mainly on the grounds that the location was not sustainable. Identified issues in the Sustainability Appraisal.	The site is identified as potentially suitable in the SHELAA. However development of this scale would be contrary to the strategy for the Local Plan which seeks to focus strategic scale development in Felixstowe and Saxmundham alongside provision of infrastructure. Alternative strategies
520	Land East of Bell Lane & South of Kesgrave	Mixed use	Kesgrave	Rushmere St Andrew Parish Council	Recently been rejected on appeal. Sustainability of traffic along Foxhall Road, feeder into Ipswich	
520	Land East of Bell Lane & South of	Mixed use	Kesgrave	SCC Highways	Larger scheme would require alternative highway	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Kesgrave				mitigation at Foxhall Road. Need for sustainable links to Longstrops and Kesgrave as well as footway/cycle links.	are considered in Appendix A Alternative Policies of the First Draft Local Plan. Highways comments are considered through the draft SHELAA.
618	Area FF and Fentons Wood, Wilkinson Drive	Housing	Kesgrave	Private individual	Exclude this site from development	Comments noted. Site below the 0.2ha site size threshold
618	Area FF and Fentons Wood, Wilkinson Drive	Housing	Kesgrave	Greenways Project	Valuable woodland with high community value.	
618	Area FF and Fentons Wood, Wilkinson Drive	Housing	Kesgrave	Private individual	This site is one of the last remaining woodlands in Kesgrave itself. It is a valued community asset and rich in wildlife. It is therefore entirely unsuitable for development	Comments noted. The site is not a potential site due to loss of open space.
618	Area FF and Fentons Wood, Wilkinson Drive	Housing	Kesgrave	SCC Highways	No Comments - extension to existing development area.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
725	Land to the north of the Tesco Store, Ropes Drive, Kesgrave, IP5 2FU	Housing	Kesgrave	Private individual	Do not believe this land was ever intended for residential use but for business/retail use.	Comment noted. The site has been identified as not potential as it is below the size threshold for allocation within the First Draft Local Plan.
726	Land to the south of the Tesco Store, Ropes Drive, Kesgrave, IP5 2FU	Housing	Kesgrave	Private individual	Do not believe this land was ever intended for residential use but for business/retail use.	Comment noted. The site has been identified as not potential as it is below the size threshold for allocation within the First Draft Local Plan.
870	Land at Kiln Farm, Main Road	Housing	Kesgrave	Historic England	Site contains three scheduled monuments – their setting should form part of considerations for this site.	Comments noted however site is not available for consideration in the Local Plan.
870	Land at Kiln Farm, Main Road	Housing	Kesgrave	Greenways Project	Significant areas of semi natural habitats. Part of area should form strategic green space to mitigate development of the scale proposed in the Local Plan.	The Local Plan does not seek to allocate significant growth in the area to the east of Ipswich and therefore it is not necessary to

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						consider mitigation of this scale in this area.
74	Land adj to Moyses Cottage and north of Lings Field	Housing	Kettleburgh	Kettleburgh Parish Council	Not appropriate for development	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment – However, it is deemed that Site 544 (draft site allocation: SCLP12.50) is a more suitable site due to being more centrally located in the village, and the scale of development if both sites were to be allocated would be inappropriate relative to the size of the settlement.
198	Land adj. Churchside, Church Road	Affordable Housing	Kettleburgh	Kettleburgh Parish Council	Not appropriate for development	Site identified as potentially suitable in Draft Strategic Housing

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and Economic Land Availability Assessment – However, it was deemed Site 544 is a more suitable site due to being more centrally located within the village.
198	Land adj. Churchside, Church Road	Affordable Housing	Kettleburgh	Private individual	Site in inappropriate because of impact on village character and amenity, traffic considerations, environmental impact and lack of housing need in the village.	Comment noted. Issues related to access and impact on heritage are considered through the Draft SHELAA. The site is not a preferred site as site 544 elsewhere in the Parish is more suitable for allocation due to being more centrally located.
245	Land west of Rectory Road	Affordable Housing	Kettleburgh	Kettleburgh Parish Council	Not appropriate for development	Site identified as potentially suitable in Draft Strategic Housing and Economic Land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Availability Assessment – However, it was deemed Site 544 is a more suitable site due to being more centrally located within the village.
538	Rectory Farm, Kettleburgh	Housing	Kettleburgh	Kettleburgh Parish Council	Not appropriate for development	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is not within, adjoining, adjacent or well related to the form of the settlement.
544	Land and Buildings Northside of the Street	Housing	Kettleburgh	Kettleburgh Parish Council	Not appropriate for development	Site identified as a preferred site in the First Draft Local Plan (site allocation: SCLP12.50). Development of the site accords with the Local Plan Strategy of

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						delivering moderate growth in the rural areas of the district.
225	Little Acre, Church Lane	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Access to the site via Church Lane is so narrow that a car cannot pass a pedestrian and if two cars meet, one must back up all the way to the exit of the road.	Site identified as unavailable in the Draft SHELAA
225	Little Acre, Church Lane	Housing	Kirton	Private individual	Understand it has been turned down in the past due to narrow access.	
225	Little Acre, Church Lane	Housing	Kirton	Private individual	Object on grounds of poor access.	
225	Little Acre, Church Lane	Housing	Kirton	Private individual	Object on grounds of poor access.	
225	Little Acre, Church Lane	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport, schools and health.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and therefore Sustainability Appraisal not undertaken.
327	Land north of A14, East of Walk Farm	Housing with Employment	Kirton	Private individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment, however part is now covered by site 706 which is proposed for allocation for employment under Policy SCLP12.30 which requires significant landscaping and buffers. The Habitats Regulations Assessment screening identifies the need for appropriate assessment.
327	Land north of A14, East of Walk Farm	Housing with Employment	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport, schools and health.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and therefore Sustainability Appraisal not undertaken.
327	Land north of A14, East of Walk Farm	Housing with Employment	Kirton	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment, however part is now covered by site 706 which is proposed for allocation for employment under Policy SCLP12.30 which requires significant landscaping and buffers.
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Private individual	Would be irresponsible and controversial for the Council to allow such development because of loss of good fertile land, development would have a devastating affect on local	Whole site identified as unavailable in the Draft SHELAA, however part is now covered by site 706 which is proposed for allocation for employment under

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					community, would not provide employment, increased air pollution due to prevailing winds, remove the break between the villages.	Policy SCLP12.30 which requires significant landscaping and buffers. The Habitats Regulations Assessment screening identifies the need for appropriate assessment.
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Private individual	Development on this site will result on continuous development between Felixstowe and Ipswich – totally out of keeping with	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the Suffolk Coastal area. Extra traffic generated would put strain on overloaded road system. Loss of agricultural land and effects on the environment.	
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Private individual	Development of this site for port related activities would have a significant negative impact on local residents through light pollution and 24 hour operation.	
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Kirton & Falkenham Parish Council	Negative, site isolated from the village, lack of viable access for employment.	
327	Land north of A14, east of Walk Farm	Housing with Employment	Kirton	Private individual	Why do we need to destroy farmland for employment? I am sure that not all industrial sites in Felixstowe, Ipswich and surrounding area are full?	
327	Land north of	Housing with Employment	Kirton	SCC	Inappropriate for mixed use	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	A14, east of Walk Farm			Highways	due to unsustainable location.	
347	Land north west of Walk Farm	Off-port distribution facilities	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should identify negative effects for quality of life, health and housing.	Sustainability Appraisal identifies negative effects on health, air, climate change, biodiversity and landscape. Note that site not preferred for allocation.
362	Land at Innocence Cottage, Innocence Lane	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport, schools and health.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal not undertaken.
552	Land fronting Falkenham Road	Housing	Kirton	Hopkins Homes	Land promoted for development.	The site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Assessment however has not been proposed for allocation with potential impact on the river valley landscape being an issue.
552	Land fronting Falkenham Road	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for landscape, transport and schools.	Sustainability Appraisal addresses these issues.
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Proposal to create large industrial zones close to quiet village is unbelievable, every effort should be made to utilise brown field sites first. Roads were not designed to accommodate large vehicles and port is likely to be fully automated by 2036. Urban sprawl into the countryside is nibbling away at precious farm land	Site proposed for housing, not employment uses, however access and highways are identified as issues. Site identified as potentially suitable in Draft SHELAA – However, it is deemed Site 1077 (site allocation: SCLP12.51) is a more suitable site being more centrally

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					and sewage systems are extremely poor.	located in the village.
552	Land fronting Falkenham Road	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Ribbon development which would significantly link Kirton & Falkenham, adversely affecting their different characters.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Roads would not be able to support additional properties and volume of extra cars. Concern about school places. Maybe a small development of no more than 10 houses would make more sense.	
552	Land fronting Falkenham Road	Housing	Kirton	Landbridge	Site promoted by landowner for residential use	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Strongly object to this development as it will ruin the character of the village, adverse effect on	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					residential community, increase of noise and light pollution, visual impact of development on wildlife and landscape	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Strongly object as development would encourage urbanisation in the countryside.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Objection on grounds of access, overlooking of the site, loss of wildlife habitat, highways and drainage infrastructure.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Strongly object, adverse effect on neighbouring houses, extra noise, traffic and light pollution.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Objection on grounds of access, overlooking of the site, loss of wildlife habitat, highways and drainage infrastructure.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Site does not give easy access to main road system and would impact impact in a small village.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Objection on grounds of access, overlooking of the site, loss of wildlife habitat, highways and drainage infrastructure.	
552	Land fronting Falkenham Road	Housing	Kirton	Private individual	Proposal is unbelievable, brownfield sites should be brought forward first. Existence of safe urban living is being severely jeopardised by HGV on roads never designed to accommodate these vehicles in the first place. Do not buy into the fact that housing is required to meet future employment demand, as the Port if looking to automation, so	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					where will the work come from? Roads associated dangers, with poor junctions and visibility restrictions.	
552	Land fronting Falkenham Road	Housing	Kirton	SCC Highways	Footway extension on Falkenham Road required.	
553	Land fronting Church Lane, Kirton	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport, schools and health.	Sustainability Appraisal addresses these issues.
553	Land fronting Church Lane, Kirton	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Access to the site via Church Lane is so narrow that a car cannot pass a pedestrian and if two cars meet, one must back up all the way to the exit of the road.	Small village in the strategy for limited housing growth. River valley landscape constraints reflected in the emerging approach to not prefer this site.
553	Land fronting Church Lane, Kirton	Housing	Kirton	Private individual	Site been turned down in the past due to narrow access.	
553	Land fronting	Housing	Kirton	Private	Object on grounds of poor	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Church Lane, Kirton			individual	access, highways, drainage and impact on character of the rural area.	
553	Land fronting Church Lane, Kirton	Housing	Kirton	Private individual	Object on grounds of poor access, no street lights or pavements.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Hopkins Homes	Development would have a detrimental effect on the character of the village and landscape. Possible drainage issues on the site.	Comments noted however site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for landscape, transport and schools.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal not undertaken.
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Site lies within an SLA and is a key visual amenity.	Comments noted however site identified as unavailable in the Draft SHELAA

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site has major significance either as flood plain, AONB, meadow lands.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Object on grounds of access, over development, loss of wildlife, inadequate highways and drainage.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Access is dangerous, large vehicles using narrow lanes, greenfield site, impact on listed building and wildlife.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site is outside of the physical limits boundary of Kirton. Infrastructure concerns, dangerous roads and bends and site lies within Special Landscape Area.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Development would have a significant environmental impact on the village with detrimental impact on light,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					traffic and noise pollution and impact on local roads due to increased population.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site previously rejected due to bends in the roads.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Development would totally swamp the village and should be considered off limits.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Object on grounds of access, traffic, overdevelopment and loss of wildlife.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site rejected on previous occasions, Kirton is a village with narrow roads and could not cope with influx of vehicles. Green field site which would lead to decimation of a beautiful	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					village.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Majority of vehicles travel faster than speed restrictions despite severe bends. Kirton has no school and minimal employment; site is within special landscape area, eradication of habitat.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site rejected previously, on a dangerous bend with no safe access point and drainage issues.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site is on a dangerous bend with no pavements or street lights. Drainage issues in the area.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Private individual	Site unsuitable for housing, on a dangerous bend with no pavements and drainage issues.	
654	Land to the rear of 101-137	Housing	Kirton	Private individual	Site rejected previously, impact on listed building	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bucklesham Road				and poor road and access arrangements. Kirton is a beautiful village	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	Levington & Stratton Hall Parish Council	Parish Council oppose use of land which would contribute to the urbanisation of green space between Ipswich and Felixstowe.	
654	Land to the rear of 101-137 Bucklesham Road	Housing	Kirton	SCC Highways	Footway along site frontage on Bucklesham road required.	
754	Land West of Bucklesham Road	Housing and open space	Kirton	Trinity College, Cambridge	Land promoted for development	Site identified as a potentially suitable site in the SHELAA although it is considered that site 1077 is more suitable for allocation as it would enable gaps in the built area to be retained.
754	Land West of Bucklesham	Housing and open space	Kirton	Kirton and Falkenham	Sustainability Appraisal should not identify positive	Addressed in Sustainability Appraisal.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road			Parish Council	effects for landscape, transport and schools.	However site not selected as preferred for allocation.
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Key visual amenity for an SLA. Subject to flooding and Ordnance Survey documents a spring.	Comments noted. Whilst the site is identified as potentially suitable in the sHELAA, the site is not a preferred site due to loss of open gap in built up part of settlement.
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Private individual	Site has major significance as flood plan, AONB, Scientific interest, meadow lands.	
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Private individual	Objection on following grounds of Access/traffic (parking and road safety issues) and loss of wildlife habitat	
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Private individual	Developments would have significant, environmental impact of what is a small community of Kirton. In the village setting, there is little in the way of light, traffic	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					and noise pollution. Significant modern development would certainly change this community's sympathetic understanding of its surroundings.	
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Private individual	I am aware that the farmer struggles to grow crops here due to the ground being water logged by an underground stream	
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Levington & Stratton Hall Parish Council	Parish Council oppose use of land as this would lead to urbanisation of the green spaces between Ipswich and Felixstowe.	
754	Land West of Bucklesham Road	Housing and Open Space	Kirton	Private individual	Should allow gradual development in proportion to what is already here. Some of the smaller sites should be looked at first.	
755	Land West of	Housing and Open Space	Kirton	Hopkins	Development of this site	Site is not proposed for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Trimley Road			Homes	would alter the character of the village by breaching the western side of Trimley Road.	allocation – its development would result in loss of open gap.
755	Land West of Trimley Road	Housing and Open Space	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for landscape, transport and schools. Query if site in agricultural use.	Addressed in Sustainability Appraisal. However site not selected as preferred for allocation.
755	Land West of Trimley Road	Housing and Open Space	Kirton	Trinity College, Cambridge	Land promoted for development	Site identified as a potentially suitable site in the SHELAA although it is considered that site 1077 is more suitable for allocation as it would enable gaps in the built area to be retained.
755	Land West of Trimley Road	Housing and Open Space	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. SCDC reports it would increase pollution and the site is subject to flooding, it would impact major landscape	Comments noted. The site is not a preferred site as site 1077 is more suitable for allocation. It is considered that site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sites. The size would impact the village greatly. Ribbon development would fragment village further.	1077 provides a more appropriate opportunity by retaining the open spaces in the built form of the settlement.
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	Site is too big an increase in the housing stock for the village and again Farm Land.	
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	Objection on following grounds - Access/traffic (parking and road safety issues) Cumulative impact Outlook Loss of high quality arable farm land - Britain is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to research undertaken by The University of Cambridge.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Loss of wildlife habitat Totally inappropriate overdevelopment of a site Highways and drainage infrastructure inadequate	
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	Impact on local road network, safety of school children and public. Environmental issues would be obvious with such a large development and modern housing would not be in keeping with local housing.	
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	The road infrastructure is already at breaking point with dangerous bends and close to primary schools.	
755	Land West of Trimley Road	Housing and Open Space	Kirton	Levington & Stratton Hall Parish Council	Parish Council oppose use of land as this would lead to urbanisation of the green spaces between Ipswich and Felixstowe.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	Small part of site would make a good place to build but need to consider impact on village green which is public land and uses by local people. There is no traffic problem in Kirton, cars are few and far between and the main problem is cars travelling too fast.	
755	Land West of Trimley Road	Housing and Open Space	Kirton	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
755	Land West of Trimley Road	Housing and Open Space	Kirton	Private individual	Development on this size would totally swamp the village. Site also has a major water main running under it.	
755	Land West of Trimley Road	Housing and Open Space	Kirton	SCC Highways	Footway along frontage with ped crossing and links to village centre	
856	Land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport and schools.	Addressed in Sustainability Appraisal. However site not selected as preferred for allocation.
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. Access would appear to be extremely difficult. It is believed to be near a sewage pump. Part of it is landfill.	Comments noted. Site identified as potentially suitable in Draft SHELAA however is not identified for allocation and it is noted that access in particular may be difficult to achieve.
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site has major significance as flood plan, AONB, Scientific interest, meadow lands.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Objection on following grounds - Access/traffic (parking and road safety issues) and loss of wildlife habitat	
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site is outside of physical limits boundary, limited facilities in the village and increased pressure on noise, light and emissions with increased recreational pressure on roads, footpaths and sensitive areas.	
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site previously rejected due to bends in the road.	
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site rejected previously and these reasons are still valid. I am totally against any further development in the village.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Poor access via a single track on a dangerous bend.	
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site would add excessive traffic and impact on the already sustained drainage and access issues.	
856	land to the rear of 76 - 86 Bucklesham Road	Housing	Kirton	Private individual	Site offered and rejected before. Site is set aside for wildlife.	
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Site has major significance as flood plain, AONB, Scientific interest, meadow lands.	Comments noted. The site has been identified as not potential as it is below the size threshold for allocation within the First Draft Local Plan.
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Objection on following grounds - Access/traffic (parking and road safety issues) and loss of wildlife habitat.	Site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Farmer struggles to grow crops due to water becoming water logged.	
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Should allow gradual development in proportion to what is already here. Some of the smaller sites in the centre of the village would be ones to look at first.	
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Levington & Stratton Hall Parish Council	Parish Council oppose use of land as this would lead to urbanisation of the green spaces between Ipswich and Felixstowe.	
857	Land at 65 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Do not wish to see 4 houses to the rear of my property which will lead to loss of view, reduced privacy and devaluing the property.	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Hopkins Homes	Site has issues around access and flooding, and impact on setting of Grade	Site identified as unavailable in the Draft Strategic Housing and

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					II Listed Manor House.	Economic Land Availability Assessment
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for landscape, transport and schools.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment therefore Sustainability Appraisal not undertaken.
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Site has major significance as flood plan, AONB, Scientific interest, meadow lands.	Site identified as unavailable in the Draft SHELAA
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Objection on following grounds - Access/traffic (parking and road safety issues) Cumulative impact Loss of wildlife habitat Inappropriate overdevelopment of a site Highways and drainage	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					infrastructure inadequate	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Site has been previously rejected due to bends in the road.	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Kirton & Falkenham Parish Council	STRONGLY NEGATIVE. SCDC point out it is close to an important listed building and it would impact major landscape sites. Has surface water flooding. The size would impact the village greatly	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Site is outside of physical limits boundary, limited facilities in the village and increased pressure on noise, light and emissions with increased recreational pressure on roads, footpaths and sensitive areas.	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Development of any size would totally swamp the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					village and should be considered “off limits”	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Poor access to the site, Bucklesham Road is a single track with dangerous bends and poor visibility.	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	Private individual	Would lead to excessive traffic, noise and further strained drainage.	
1037	Land adj. 14-32 Park Lane, Kirton	Housing	Kirton	SCC Highways	Footway improvements and potentially widening required on Park Lane	
1077	Land to the rear of 31-37 Bucklesham Road	Housing	Kirton	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport and schools.	Addressed in Sustainability Appraisal.
1077	Land to the rear of 31-37 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Site has major significance as flood plain, AONB, Scientific interest, meadow lands.	The comments have been considered in identifying preferred sites. Whilst the site is not in the AONB, comments regarding landscape have been
1077	Land to the rear of 31-37 Bucklesham	Housing	Kirton	Private individual	Objection on following grounds, access/traffic (parking and road safety	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Kirton				issues) ad loss of wildlife habitat.	taken on board and Policy SCLP12.51
1077	Land to the rear of 31-37 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Farmer struggles to grow crops due to water becoming water logged.	requires existing trees and hedgerows on the boundaries of the site to be retained. It is
1077	Land to the rear of 31-37 Bucklesham Road, Kirton	Housing	Kirton	Kirton & Falkenham Parish Council	NEGATIVE. SCDC point out it will increase emissions and it would impact major landscape sites. Has surface water flooding	acknowledged that there is an area of surface water flooding in the south east of the site and development of the
1077	Land to the rear of 31-37 Bucklesham Road, Kirton	Housing	Kirton	Private individual	Should allow gradual development, in proportion to what is already here. Some of the smaller sites in the centre of the village would be ones to look at first.	site will be expected to address this and it is expected that Sustainable Drainage Systems would be provided. This site has been selected as
1077	Land to the rear of 31-37 Bucklesham Road, Kirton	Housing	Kirton	Levington & Stratton Hall Parish Council	Parish Council oppose use of land as this would lead to urbanisation of the green spaces between Ipswich and Felixstowe.	preferable to other sites in the village which would result in the loss of open views.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
52	Land opposite Knodishall Primary School, Judith Avenue	Housing	Knodishall	Savills	Site promoted by landowner for residential use	Comments noted. The site is identified as a potential site in the Draft SHELAA however is not proposed for allocation due to access issues.
52	Land opposite Knodishall Primary School, Judith Avenue	Housing	Knodishall	SCC Highways	Significant improvements to Sloe Lane required plus footway and/or ped crossing on B1069	
405	Land off Snape Road	Housing + open space	Knodishall	Fielden Limited	Site promoted by landowner for residential use	Comments noted. Site identified as not potential as it is not within, adjoining, adjacent or well related to a settlement.
405	Land off Snape Road	Housing + open space	Knodishall	Suffolk Wildlife Trust	Site is adjacent to Knodishall Common CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	
960	Land to the south east of St Andrews Rd, Knodishall	Housing	Knodishall	Savills	Site neighbours listed buildings and any development will need to mitigate this impact.	Comment noted. The site is identified as not potential for allocation due to significant access

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						issues. The assessment also identified heritage assets that would need consideration by any applications if the site had been deemed suitable for allocation.
3	Land adjacent to Sizewell Sports and Social Club, King Georges Avenue	Housing	Leiston	Hopkins Homes Ltd	The access is not wide enough.	Comment noted. Access is identified as an issue in the SHELAA however the site is identified as potentially suitable.
3	Land adjacent to Sizewell Sports and Social Club, King Georges Avenue	Housing	Leiston	Leiston Town Council	Site was rejected during the production of the Neighbourhood Plan.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
3	Land adjacent to Sizewell Sports and Social Club, King Georges Avenue	Housing	Leiston	SCC Highways	Direct access from King George's Avenue recommended. Contribution towards Station Road junction improvements may be	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					required.	
254	Land rear 43-67 Abbey Road	Housing	Leiston	Hopkins Homes Ltd	The access is not wide enough.	Comment noted. Access is identified as an issue in the SHELAA however the site is identified as potentially suitable.
254	Land rear 43-67 Abbey Road	Housing	Leiston	SCC Highways	Improvement to access road required.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
255	132-136 Haylings Road	Housing / holiday homes	Leiston	Hopkins Homes Ltd	Site is heavily wooded and has ecological constraints.	Whilst the site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability Assessment, the Council supports a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
255	132-136 Haylings Road	Housing/Holiday Homes	Leiston	SCC Highways	Potential 30 mph speed limit extension required	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
498	Land at Red House Lane	Housing	Leiston	Hopkins Homes Ltd	Land promoted for development	Whilst the site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability Assessment, the Council supports a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
498	Land at Red House Lane, Leiston	Housing	Leiston	Leiston Town Council	Site is under construction for 70 units, earmarked as a reserve site in the next revision of the Neighbourhood Plan.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a future review of the Neighbourhood Plan as the mechanism for planning for residential development for the period to 2036.
498	Land at Red House Lane, Leiston	Housing	Leiston	SCC Highways	Improvements to Red House Lane required. Contribution towards Station Rd signalised junction improvements as with other sites in Leiston	
545	Sizewell A Site, Nr Leiston	Office / Storage / Industry	Leiston	NDA and Magnox Ltd	Land promoted for development.	Site identified as potentially suitable however it was deemed that sites elsewhere in the District would be more suitable for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						allocation to meet evidenced need.
634	Rear of 9 and 11 South Close and 49 Garrett Crescent	Housing	Leiston	Leiston Town Council	Desperate for Flagship to actually develop this site - waited 3 years so far	Comment noted. However site identified as unavailable in the Draft SHELAA. The site is within the Physical Limits Boundary identified in the Leiston Neighbourhood Plan where the principle of development is accepted.
720	Caravan Park, King Georges Avenue	Housing	Leiston	Leiston Town Council	Remains designated for a touring caravan park and not for development - this should be removed	Comments noted however site identified as unavailable in the Draft SHELAA.
720	Caravan Park, King Georges Avenue	Housing	Leiston	Leiston Town Council	Statutory allotments and would have to be an exception site.	
722	Land adjacent to 112-128 Haylings Road	Housing	Leiston	Hopkins Homes Ltd	Sustainably located but appears to contain allotments. These would	Site identified as unavailable in Draft Strategic Housing and

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					need to be surplus before development could be allocated.	Economic Land Availability Assessment.
1056	Land opposite 52-74 St Margarets Crescent, Leiston	Housing	Leiston	Leiston Town Council	Should the Secretary of State give permission, the site could potentially be suitable for modest development on half the land as long as the other half was gifted modern play equipment and given to the community for community use. The development would have to be approved in the next review of the Neighbourhood Plan however.	Comments noted. Site removed from assessment as it is designated as part of an allocation in the Leiston Neighbourhood Plan.
1056	Land opposite 52-74 St Margarets Crescent, Leiston	Housing	Leiston	SCC Highways	Appears access would be from Neale Close. Assessment of suitability of access point required.	
767	Abbey Farm	Housing/Office/Industry	Letheringham	Letheringham Parish	Proposed site is adjacent to listed church, Letheringham	Comment noted. Site identified as unsuitable

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Council	Priory and forms part of the Deben Valley area. Concerns related to scale of proposed development, pressure on existing resources and infrastructure and environmental factors.	in Draft SHELAA – site is not within, adjoining, adjacent or well related to the form of the settlement.
1052	Land at The Street/Park Road	Housing	Letheringham	Letheringham Parish Council	Proposed site is high quality agricultural land, situated at the centre of Letheringham. Site includes a quarry, important for local wildlife and faces listed cottages. Concerns related to scale or proposed development, pressure on existing resources and infrastructure and environmental factors.	Comment noted. The site is identified as not available within the draft SHELAA.
1052	Land at The Street/Park Road	Housing	Letheringham	Private individual	Concern about the scale of the proposed development, impact on existing	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					infrastructure and services and the environmental impact of the site coming forward.	
1052	Land at The Street/Park Road	Housing	Letheringham	Private individual	Oppose the development due to countryside location. Village is not a sustainable village and development of this scale would have a devastating impact in an area with no public house of shop, narrow roads and liable to flooding from the river Deben.	
1052	Land at The Street/Park Road	Housing	Letheringham	SCC Highways	Remote from local amenities and footways. Significant improvements to sustainable links required.	
15	Land adjacent Levington Park, Bridge Road	Housing	Levington	Private Individual	Private Individual	Comments have been considered however the site is proposed for allocation due to representing a logical development within the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						general pattern of the current settlement which will contribute towards meeting the District's housing requirement. Levington is identified as a small village in the settlement hierarchy and therefore in principle development is considered appropriate. The issues addressed have been reflected in the policy, including requiring the design and layout to reflect the site's location in the AONB.
15	Land adjacent Levington Park, Bridge Road	Housing	Levington	Private individual	Oppose on the grounds of the site directly abutting the AONB, proposed development is too big an increase for the village.	These comments have been considered however the site is proposed for allocation due to representing a logical development within the general
15	Land adjacent Levington Park,	Housing	Levington	Private individual	Village could not support this potential development,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bridge Road				sewerage system could not handle extra demands, detrimental effect on the AONB and current amenities do not support any further development.	<p>pattern of the current settlement which will contribute towards meeting the District's housing requirement. Levington is identified as a small village in the settlement hierarchy and therefore in principle development is considered appropriate. The issues addressed have been reflected in the policy, including requiring the design and layout to reflect the site's location in the AONB.</p>
15	Land adjacent Levington Park, Bridge Road	Housing	Levington	Private individual	We feel that this site is not suitable for such development, primarily due to the lack of suitable local services in the village (no school, no shop, no Post Office, very limited village bus service on three days a week to Ipswich only).	
15	Land adjacent Levington Park, Bridge Road	Housing	Levington	Private individual	Consider that the construction of 22 new homes right on the boundary of the Suffolk Coast and Heaths AONB to be inappropriate due to its proximity to the AONB.	
15	Land adjacent	Housing	Levington	Levington &	The proposed 22 houses	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Levington Park, Bridge Road			Stratton Hall Parish Council	would be an increase of about 26% which would not be sufficient to add any further facilities to the village which would remain as minimal, hence the position of Levington in the Hierarchy of Settlements, and the initial site assessment by SCDC rightly mentions the site being near a bus stop, What it doesn't mention is that the bus service only operates three mornings a week, only to Ipswich, and the bus has a turnaround time of about two hours.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	Feedback acknowledged in relation to environmental impacts of such an extensive greenfield site. The site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private Individual	Object to development due to loss of open space and agricultural land, urban sprawl, impacts on tourism, traffic and pollution and infrastructure.	is not identified as a preferred allocation as it is considered that site 706 presents more benefits including retaining the gap between Ipswich and Felixstowe.
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Stratton Hall Farms	Land promoted for development.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private Individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private individual	Alarmed by the potential linking of Ipswich and Felixstowe into one urban sprawl.	Feedback acknowledged in relation to environmental impacts of such an extensive greenfield site. The site is not identified as a preferred allocation as it is considered that site 706 presents more benefits including
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private individual	Village could not support this potential development, sewerage system could not handle extra demands, detrimental effect on the AONB and current	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					amenities do not support any further development.	retaining the gap between Ipswich and Felixstowe.
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Kirton & Falkenham Parish Council	NEGATIVE. Will create pollution and traffic. Loss of agricultural land	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private individual	Any development on this site would have a huge impact on the properties surrounding including health and wellbeing, noise and light pollution. Goes against the community well being policy and part of the land is designated SSSI. Strongly oppose any development of the land as it will have negative impact on the village and local communities.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Levington & Stratton Hall Parish	The land does not meet the criteria for the village in the Hierarchy of Settlements of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Council	development only being permitted on in-fill sites; and the land directly abuts the boundary of the AONB and does not provide any separation or hinterland to this specially protected area.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private individual	The proposed industrial development would have a detrimental effect on our	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					lifestyles, value of our properties and with consultation of local estate agents, this would likely deem our properties unsalable causing financial misfortune of the greatest kind.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	Private individual	Currently the A14 corridor between Ipswich and Felixstowe remains predominantly agricultural land, with discrete villages, Nacton, Brightwell, Bucklesham, Levington, Kirton, Trimley St Martin and St Mary existing as part of this rural infrastructure. There does not appear to be any rationale for industrial, employment and warehouse development. There should be no	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					creeping development along the Ipswich to Felixstowe corridor as this would impact on the AONB and threaten independent identify of villages.	
347	Land north west of Walk Farm	Off-port distribution facilities	Levington	SCC Highways	Left in left out currently, linked to 288 above. Would provide land for grade separated junction upgrade.	
50	Manor Farm, Little Bealings	Housing	Little Bealings	Little Bealings Parish Council	Considers Site Number 50 to be unsustainable for development, given that access is along an unmade track and there is no footway access within the village	Comments noted. Site not preferred for allocation. The strategy does not identify the small village of Little Bealings as a focus for growth.
50	Manor Farm, Little Bealings	Housing	Little Bealings	Private individual	Listed in potential land for development is number 50 Manor Farm Little Bealings. This is not a suitable site for housing development. The	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					area is incorrectly illustrated on the map. It lies outside the village boundary. Access is poor onto a blind spot on the road. SCDC have previously reviewed this area and deemed it not suitable for development.	
235	Land adjacent to 1 Holly Cottages, Holly Lane	Housing	Little Bealings	Little Bealings Parish Council	Understands that Site Number 235 is not proposed by the owner of at least 50% of the land, and, in any event, is too small for development.	Comments noted. Site not preferred for allocation. The strategy does not identify the small village of Little Bealings as a focus for growth.
235	Land adjacent to 1 Holly Cottages, Holly Lane	Housing	Little Bealings	Private individual	Part of the site is not available as access is only via a private driveway which is unviable, would deny access to an existing property and should be removed from the list.	
128	Land opposite 1-	Housing	Little	Little	Development on this site	Site identified as

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	12 Streetfield		Glemham	Glemham Parish Council	would completely change the character of the village.	unavailable in Draft Strategic Housing and Economic Land Availability Assessment
128	Land opposite 1-12 Streetfield	Housing	Little Glemham	SCC Highways	Necessary widening and footway provision on Church Road appears unfeasible	Site identified as unavailable in Draft SHELAA.
729	Blaxhall Hall, Little Glenham	Housing/ Holiday Accomidation	Little Glemham	Blaxhall Parish Council	Parish Council in favour of development on this site provided the number of proposed homes is scaled back to around 10 properties.	The site been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
729	Blaxhall Hall, Little Glenham	Housing/ Holiday Accomidation	Little Glemham	Private individual	Support one or two self build cottages.	
729	Blaxhall Hall, Little Glenham	Housing/ Holiday Accomidation	Little Glemham	Blaxhall Commons and Open Spaces Charitable Trust	Development here would relate to the conversion of existing farm buildings. In this sense it would not directly impact on Blaxhall's commons and open spaces, although there are	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					concerns about traffic generation and the suitability of this site in terms of sustainability	
361	Land at Parham Airfield	Light Industrial	Marlesford	Parham Parish Council	Council supported the development of Plot 361 for light industrial purposes in principle.	Comment noted. Identified for employment use in the Local Plan.
400	land at Ivy House Farm, Ashe Road	Residential and employment	Marlesford	Marlesford Parish Council	Parish Council would be supportive of non residential development	Marlesford is identified as being in the countryside and therefore non-residential uses would only be supported where in accordance with relevant policies relating to the countryside.
5	land opposite The Red Lion, Main Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, in flood zone 2 and 3, pressure on estuaries and	Comments noted. Site not preferred for allocation and the strategy for Martlesham recognises

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					SPAs, impact on setting of grade II Listed Building, adjacent Special Landscape Area.	environmental constraints to growth towards the estuary and Woodbridge.
5	land opposite The Red Lion, Main Road	Housing	Martlesham	Woodbridge Town Council	Development should be resisted within what we would argue is a cordon sanitaire. The conurbations must remain areas distinct and urban sprawl resisted	Comments noted. Site not preferred for allocation recognising environmental constraints to growth towards the estuary and Woodbridge.
5	land opposite The Red Lion, Main Road	Housing	Martlesham	District Councillor Kelso	Site outside of the physical limits boundary, located within flood zone, will lead to increased recreational pressure on the Deben Estuary, adjacent to Special Landscape Area and impact on listed buildings.	
5	land opposite The Red Lion, Main Road	Housing	Martlesham	Private individual	Much of the area has been refused at appeal by a government officer. Issues resolved around flood plain, area of outstanding natural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					beauty, congestion, coalescence and impact on environment.	
5	land opposite The Red Lion, Main Road	Housing	Martlesham	Private individual	Increased flood risk.	
117	Land adjacent Brook House, Bealings Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, in flood zone 2 and 3, pressure on estuaries and SPAs, TPOs, Grade II Listed Buildings	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
117	Land adjacent Brook House, Bealings Road	Housing	Martlesham	Woodbridge Town Council	Development should be resisted within what we would argue is a cordon sanitaire. The conurbations must remain areas distinct and urban sprawl resisted	Site identified as unavailable in Draft SHELAA.
117	Land adjacent Brook House, Bealings Road	Housing	Martlesham	District Councillor Kelso	Site outside of the physical limits boundary, located within flood zone, will lead to increased recreational	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					pressure on the Deben Estuary, adjacent to Special Landscape Area and impact on listed buildings and tree preservation orders	
117	Land adjacent Brook House, Bealings Road	Housing	Martlesham	Private individual	Would lead to loss of amenity land and impact on wildlife.	
126	Land off Hall Road, Rear of The Chestnuts	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, County Wildlife Site, in flood zone 2 and 3, pressure on estuaries and SPAs, TPOs, Grade II Listed Buildings, in Special Landscape Area,	Comment noted. Site identified as unavailable in Draft SHELAA.
126	Land off Hall Road, Rear of The Chestnuts	Housing	Martlesham	Private individual	Exclude this site from development.	Comment noted. Site identified as unavailable in Draft SHELAA.
126	Land off Hall Road, Rear of The Chestnuts	Housing	Martlesham	Greenways Project	Unsuitable due to wildlife and landscape value and part of strategic separation	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					between Martlesham and Kesgrave.	
126	Land off Hall Road, Rear of The Chestnuts	Housing	Martlesham	Woodbridge Town Council	Development should be resisted within what we would argue is a cordon sanitairre. The conurbations must remain areas distinct and urban sprawl resisted	Comment noted.Site identified as unavailable in Draft SHELAA
126	Land off Hall Road, Rear of The Chestnuts	Housing	Martlesham	SCC Highways	Footway required on Hall Road is site accessed from there.	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, access issues, pressure on estuaries and SPAs, BAP species on site, coalescence between Martlesham and Waldringfield.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Greenways Project	Unsuitable due to biodiversity, landscape and informal recreation value.	
142	Land North of 1-	Mixed use	Martlesham	Private	I strongly believe there	The site been identified

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	30 Woodside			individual	should be a complete moratorium on all further building in or near Martlesham until the BT development is complete and an assessment made on all aspects of the impact to the infrastructure, including where these people will work and how they will get there	as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Suffolk Wildlife Trust	Site is woodland and any development here would appear to require the loss of this habitat, further assessment is required to determine the likely impacts of development at this site.	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Private individual	Much increased traffic on the immediate local roads that already struggle to cope (these would feed into	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Martlesham Heath to the east of the A12 where recent increases in retail/commercial development has already led to much increased traffic congestion),	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	District Councillor Kelso	Densely wooded area containing footpaths and TPO. Problems may be faced accessing site from Felixstowe Road or Waldringfield Road. Site within 1km of the Deben Estuary and would lead to coalescence between Martlesham and Waldringfield.	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Private individual	Development in this area would introduce unmanageable quantity of traffic into surrounding lanes, would damage the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					open and rural nature of Martlesham village and community.	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Private individual	My main objection is about rainwater run-off into Viking Heights if the fields are built on. I also feel there will be a loss of the rural feel of the village and impact on walking and social activities for which most people live in the area, therefore ruining the quality of life for all those existing residence.	
142	Land North of 1-30 Woodside	Mixed use	Martlesham	Private individual	Building on this site will destroy the remaining rural feel of Martlesham village and substantially reduce quality of life of living here.	
175	Land at and surrounding Woodbridge	Housing	Martlesham	Armstrong Rigg Planning	Site promoted by landowner for residential use.	Comments noted. Site not proposed for allocation in Draft Local

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Football club					Plan. Relocation of the football club to an alternative location not demonstrated.
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	District Councillor Kelso	Impact on Deben Estuary, site outside of physical limits boundary, road access problems and the site is at high ground when viewed from the Fynn Valley.	
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	Woodbridge Town Council	We do not agree to this site.	
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	Woodbridge Society	We understand that it is already agreed site is suitable for housing.	
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	Private individual	Much of the area has been refused at appeal by a government officer. Issues resolved around flood plain, area of outstanding natural beauty, congestion, coalescence and impact on	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					environment.	
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	SCC Highways	Envisage an extension of Flynn Road.	
175	Land at and surrounding Woodbridge Football club	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, pressure on estuaries and SPAs	Comments noted. Site not allocated in Draft Local Plan. Relocation of the football club to an alternative location not demonstrated.
181	Land to the north of the Park & Ride site	Holiday accommodation	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, pressure on estuaries and SPAs, TPOs, Special Landscape Area.	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
181	Land to the north of the Park & Ride site	Holiday accommodation	Martlesham	Private individual	Exclude this site from development.	
181	land to the north of the Park & Ride site	Holiday accomodation	Martlesham	Woodbridge Town Council	Development should be resisted within what we would argue is a cordon	Comment noted. Site identified as unavailable in Draft SHELAA.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sanitaire. The conurbations must remain areas distinct and urban sprawl resisted	
181	land to the north of the Park & Ride site	Holiday accomodation	Martlesham	District Councillor Kelso	Site located outside of the physical limits boundary, within a minerals consultation area, potential impact on Deben Estuary, within the SLA.	
181	land to the north of the Park & Ride site	Holiday accomodation	Martlesham	District Councillor Kelso	Site is outside of the physical limits boundary, northern part of the site is covered by fluvial and tidal flood risk, increase from recreational pressure on the Deben Estuary, tree preservation orders and listed buildings.	
181	land to the north of the Park & Ride site	Holiday accomodation	Martlesham	Private individual	Would lead to loss of amenity land and impact on wildlife	
189	Land adjacent to Bealings House,	Housing	Martlesham	Martlesham Parish	Outside of Martlesham Neighbourhood Plan	Comment noted. Site identified as unavailable

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bealings Road			Council	physical limits boundary, in a Minerals Consultation Area, flood risk, pressure on estuaries and SPAs, TPOs, BAP species, Grade II Listed Building to north of site, within SLA.	in Draft Strategic Housing and Economic Land Availability Assessment.
220	Land at Walk Farm Cottage	Housing	Martlesham	Martlesham Parish Council	Unacceptable impact on Martlesham creek, Deben estuary, AONB, Ramsar, SPA, in SLA, outside of Martlesham Neighbourhood Plan physical limits boundary.	Comment noted. Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
220	Land at Walk Farm Cottage	Housing	Martlesham	District Councillor Kelso	Site is located within flood zone 1 and site is within 1km of the Deben Estuary and surrounded by Martlesham woods.	Comment noted. Site identified as unavailable in Draft SHELAA.
221	Gibraltar Farm, Private Road	Housing	Martlesham	Martlesham Parish Council	In Minerals Consultation Area, pressure on estuaries and SPAs, In SLA, outside of Martlesham	Comments noted. The site is not a preferred site as sites elsewhere in the district are more

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Neighbourhood Plan physical limits boundary.	suitable for allocation. The Council supports the Neighbourhood Plan as the mechanism for delivering allocations for development centred on the needs of the community.
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	Private individual	Site outside of the building line of Martlesham, designated countryside and in green belt. Site would be accessed through a totally inadequate access.	The site is not identified as a potential site in the Draft SHELAA.
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	District Councillor Kelso	Site in a mineral consultation area, impact on Deben Estuary, within the SLA and outside of physical limits boundary.	
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	Private individual	Would lead to loss of amenity land and impact on wildlife. Access is poor.	
221	Gibraltar Farm,	Housing	Martlesham	Private	Access is an unadopted and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Private Road, Martlesham			individual	unmade road which is not very wide and unsuitable for any extra traffic, parking or turning of larger vehicles. Site was previously concluded unsuitable and it requires adequate mitigation. Building on a flood plan and land designated countryside ought to be avoided.	
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	Residents of Private Road and Shaw Valley Road	Access is via a single track unmade road, no scope to extend the width. Over 60% of the site is vulnerable to standing water and is outside of the building line of Martlesham village and is designated as countryside. Development in this area would unnecessarily affect the character of this part of the village.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	Private individual	Access is via a single track unadopted road, part of the site is flood plain and site is designated countryside.	
221	Gibraltar Farm, Private Road, Martlesham	Housing	Martlesham	SCC Highways	Private road does not appear suitable to accommodate traffic and ped movements	
329	Land at Collies, 3 Stiles Lane	Physical limits extension	Martlesham	Martlesham Parish Council	Potential for pressure on SPA, outside of Martlesham Neighbourhood Plan physical limits boundary, no reference in Sustainability Appraisal.	The site is not available for consideration for development in the Draft Local Plan.
329	Land at Collies, 3 Stiles Lane	Not specified	Martlesham	District Councillor Kelso	Site is within 1km of Deben Estuary, outside of the physical limits boundary.	
330	Land at Little Thrift, Felixstowe Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, part of site in Minerals Consultation Area, potential for pressure on SPA, close	Comments noted. The site is not a preferred site as sites elsewhere in the district are more suitable for allocation. The Council supports the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					to Doctor Brittain's wood.	Neighbourhood Plan as the mechanism for delivering allocations for development
330	Land at Little Thrift, Felixstowe Road	Housing	Martlesham	District Councillor Kelso	Site is located outside of the physical limits boundary, increased pressure on Deben Estuary and very close to Doctor Brittan's wood.	
331	Land south Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	Martlesham Parish Council	Site has planning permission	Comment noted. The site is not a potential site as it has planning permission.
331	Land south Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	District Councillor Kelso	Site already has planning permission for 47 homes.	
333	Land at and surrounding Woodbridge Town FC, A12	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, pressure on estuaries and SPAs	Comments noted. Site not allocated in Draft Local Plan. Relocation of the football club to an alternative location not demonstrated.
333	Land at and surrounding	Recreation facility	Martlesham	Private individual	Issues resolved around flood plan, areas of	See comments under 175.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Woodbridge Town FC, A12				outstanding natural beauty, congestion, coalescence and impact on the environment.	
333	Land at and surrounding Woodbridge Town FC, A12	Recreation facility	Martlesham	Woodbridge Town Council	The conurbations must remain areas distinct and urban sprawl resisted.	
333	Land at and surrounding Woodbridge Town FC, A12	Recreation facility	Martlesham	Woodbridge Society	We understand that it is already agreed site is suitable for housing	
344	Land immediately south of railway line, Top Street	Housing	Martlesham	Martlesham Parish Council	Planning permission refused on appeal for this site.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
344	Land immediately south of railway line, Top Street	Housing (assumed)	Martlesham	Woodbridge Town Council	We do not agree to this site.	Comments noted. Site identified as unavailable in Draft SHELAA.
344	Land immediately	Housing (assumed)	Martlesham	District Councillor	Outside of the physical limits boundary, located	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	south of railway line, Top Street			Kelso	within tidal flood zone, increased pressure on the Deben Estuary, within the SLA and close to listed buildings and TPO.	
344	Land immediately south of railway line, Top Street	Housing (assumed)	Martlesham	Private individual	Site dismissed for housing development at Public Hearing, adverse effect on granting planning permission would significantly and demonstrably outweigh the benefits.	
344	Land immediately south of railway line, Top Street	Housing (assumed)	Martlesham	Private individual	Much of the area has been refused at appeal by a government officer. Issues resolved around flood plain, area of outstanding natural beauty, congestion, coalescence and impact on environment.	
355	Land south of The Chestnuts,	Housing	Martlesham	Martlesham Parish	Outside of Martlesham Neighbourhood Plan	Comments noted. Site identified as unavailable

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hall Road			Council	physical limits boundary, site in Minerals Consultation Area, potential for pressure on SPA, TPOs, BAP species, in SLA.	in Draft SHELAA.
355	Land south of The Chestnuts, Hall Road	Housing	Martlesham	Private individual	Exclude this site from development.	
355	Land south of The Chestnuts, Hall Road	Housing	Martlesham	Greenways Project	Unsuitable due to wildlife and landscape value and separation between Kesgrave and Martlesham.	
355	Land south of The Chestnuts, Hall Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, site in Minerals Consultation Area, potential for pressure on SPA, TPOs, BAP species, in SLA.	Comments noted. Site identified as unavailable in Draft SHELAA.
355	Land south of The Chestnuts, Hall Road	Housing	Martlesham	Martlesham Parish Council	Exclude this site from development.	
355	Land south of	Housing	Martlesham	Martlesham	Unsuitable due to wildlife	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	The Chestnuts, Hall Road			Parish Council	and landscape value and separation between Kesgrave and Martlesham.	
355	Land south of The Chestnuts, Hall Road	Housing	Martlesham	District Councillor Kelso	Long history of planning refusals for sites at and near this location, outside of the physical limits boundary, impact on Deben Estuary, within the SLA.	Comment noted.Site identified as unavailable in Draft SHELAA
452	Land off Duke's Park	Housing / Retail	Martlesham	Martlesham Parish Council	Should be shown as in Martlesham, not Woodbridge. Site refused on appeal. In Minerals Consultation Area, surface water flooding, potential for pressure on SPA, adjoins AONB, 2 BAP species on site, Grade II Listed Building to west of site, TPO on eastern boundary.	Site identified as not suitable in Draft Strategic Housing and Economic Land Availability Assessment, constraints regarding protection of settlement gap.
452	Land off Duke's Park	Housing / Retail	Martlesham	Private individual	Should be rejected due to coalescence between Martlesham and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Woodbridge.	
470	The Chestnuts, Hall Road	Housing	Martlesham	Private individual	Exclude from development.	Comments noted. The site is not a preferred site as sites elsewhere in the district are more suitable for allocation. The Council supports the Neighbourhood Plan as the mechanism for delivering allocations for development centred on the needs of the community.
470	The Chestnuts, Hall Road	Housing	Martlesham	Martlesham Parish Council	Potential for pressure on SPA, outside of Martlesham Neighbourhood Plan physical limits boundary, in Minerals Consultation Area, TPO on north and west boundaries, protected flora and fauna, Grade II Listed Building, in SLA.	
470	The Chestnuts, Hall Road	Housing	Martlesham	Greenways Project	Unsuitable due to wildlife and landscape value and separation between Kesgrave and Martlesham.	
470	The Chestnuts, Hall Road	Housing	Martlesham	District Councillor Kelso	Long history of planning refusals for sites at and near this location, outside of the physical limits boundary, impact on Deben Estuary, within the SLA.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Neighbourhood Plan as the mechanism for delivering allocations for development.
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Martlesham Parish Council	Loss of agricultural land, surface water flooding, potential for pressure on SPA, coalescence between Martlesham and Waldringfield.	Comments noted. The site is not a preferred site as sites elsewhere in the district are more suitable for allocation. The Council supports the
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Martlesham Parish Council	Land promoted for development	Neighbourhood Plan as the mechanism for delivering allocations for development centred on the needs of the community.
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	District Councillor Kelso	Loss of high quality agricultural land, within flood zone 1, abuts protected woodland, outside of the physical limits boundary and may	Comments noted. The site is not a preferred site as sites elsewhere in the District are more suitable for allocation. The Council supports a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					lead to coalescence between Martlesham and Waldringfield.	review of the Neighbourhood Plan as the mechanism for delivering allocations for development.
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Private individual	I strongly believe there should be a complete moratorium on all further building in or near Martlesham until the BT development is complete and an assessment made on all aspects of the impact to the infrastructure, including where these people will work and how they will get there	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	RSPB	Development in this area could result in increased recreational disturbance to the adjacent Deben Estuary SPA and Ramsar site. Any proposed allocation must undergo HRA to consider the potential impacts of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					new development close to these sites and ensure that they are not adversely affected.	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Private individual	The site is currently arable farmland and provides a rural escape used by many people: walkers, dog walkers, horse riders etc. A development of the size suggested would destroy this very pleasant environment	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Landform Estates Limited	Site promoted by landowner for residential use.	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Private individual	Object to site on grounds of water runoff, area already struggling to cope with increase in vehicles, access and parking, loss of green spaces, improvements needed to services and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					facilities, joining of Martlesham and Woodbridge	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Private individual	Serious concern about unmanageable quantity of traffic, damage to open space and rural nature of Martlesham, impact of run off and drainage.	
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	Private individual	My main objection is about rainwater run-off into Viking Heights if the fields are built on. I also feel there will be a loss of the rural feel of the village and impact on walking and social activities for which most people live in the area, therefore ruining the quality of life for all those existing residence	
533	Land East of Felixstowe road,	Housing	Martlesham	Private individual	A major issue is drainage to Viking Heights	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Martlesham					
533	Land East of Felixstowe road, Martlesham	Housing	Martlesham	SCC Highways	Footways and potentially widening of Felixstowe road required	
683	Land at Bealings Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, loss of agricultural land, within Minerals Consultation Area, flood risk, potential for pressure on SPA, in SLA.	Comments noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
683	Land at Bealings Road	Housing	Martlesham	District Councillor Kelso	Outside of physical limits, loss of agricultural land, flood risk, impact on Deben Estuary and within the SLA.	Comments noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement.
683	Land at Bealings Road	Housing	Martlesham	SCC Highways	Footway link towards The Street required. Long distance and narrow so may not be feasible.	
734	Bloomfield's Farm, Black Tiles Lane,	Housing	Martlesham	District Councillor Kelso	Site outside of the physical limits boundary, half of the site is within an old landfill,	Comment noted. The site is not a potential site due to significant

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Martlesham				impact on Deben Estuary and within SLA.	access constraints.
734	Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, partly former landfill, potential for pressure on SPA, in SLA.	Comment noted. The site is not a potential site due to significant access constraints.
735	Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	Martlesham Parish Council	Planning permission granted	Comments noted. The site is not a potential site due to existing planning permission on the site.
735	Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	Woodbridge Town Council	We do not agree to this site	Comments noted. The site is not a potential site due to existing
735	Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	District Councillor Kelso	Planning permission already granted for 47 homes.	planning permission on the site.
735	Bloomfield's Farm, Black Tiles Lane	Housing	Martlesham	SCC Highways	Investigation required into suitability of Black Tiles Lane to serve additional development.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
781	Land Fronting Top Street and Sandy Lane	Residential/Care home/Office/Industry	Martlesham	Martlesham Parish Council	Adj site dismissed on appeal. Loss of agricultural land, potential for pressure on SPA, in AONB, coalescence between Martlesham and Woodbridge.	Comments noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement. Additionally, coalescence is also considered a significant issue.
781	Land Fronting Top Street and Sandy Lane	Residential/Care home/Office/Industry	Martlesham	Martlesham Parish Council	Should be rejected due to coalescence between Martlesham and Woodbridge.	
781	Land Fronting Top Street and Sandy Lane	Housing/Care home/Office/Industry	Martlesham	Woodbridge Town Council	We do not agree to this site	Comments noted. The site is not a potential site as it is not within, adjoining, adjacent or well related to the built form of the settlement. Additionally, coalescence is also considered a significant issue.
781	Land Fronting Top Street and Sandy Lane	Housing/Care home/Office/Industry	Martlesham	District Councillor Kelso	New site October 2016	
781	Land Fronting Top Street and Sandy Lane	Housing/Care home/Office/Industry	Martlesham	Private individual	Applications in the past have been refused as it would lead to a conurbation from Ipswich to Woodbridge.	
781	Land Fronting	Housing/Care	Martlesham	Private	South of the railway line	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Top Street and Sandy Lane	home/Office/Industry		individual	would lead to coalescence between Martlesham and Woodbridge, besides being unsuitable for other reasons that were cited in objections to the development of Land Fronting Top Street raised previously by local residents and at the Hearing.	
781	Land Fronting Top Street and Sandy Lane	Housing/Care home/Office/Industry	Martlesham	Private individual	Much of this area has already been refused at appeal – any development will impact negatively on the wheelchair and pushchair friendly walking route from Old Martlesham to Woodbridge. Would break a natural feeding corridor for birds of prey and small mammals, coalescence will also impact	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the uniqueness of Woodbridge and its importance as a tourist destination.	
920	Land south of Ipswich Road	Mixed use	Martlesham	Martlesham Parish Council	Prominent site, surface water flooding, windfarm electrical feed crosses site, potential for pressure on SPA, outside of Martlesham Neighbourhood Plan physical limits boundary.	The site is not made available for consideration for development in the Draft Local Plan.
920	Land south of Ipswich Road	Mixed Use	Martlesham	Woodbridge Town Council	We do not agree to this site	
920	Land south of Ipswich Road	Mixed Use	Martlesham	District Councillor Kelso	Very prominent site overlooking Fynn Valley, within flood zone 1, site being crossed with windfarm electrical feed and outside of the physical limits boundary.	
920	Land south of Ipswich Road	Mixed Use	Martlesham	Private individual	Site not suitable for development.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
920	Land south of Ipswich Road	Mixed Use	Martlesham	Private individual	Much of this area has been refused at appeal, issues revolved around flood plain, area of outstanding natural beauty, congestion, coalescence and impact on the environment.	
940	Shawfields and Little Shaws, Shaw Valley Road	Housing	Martlesham	Martlesham Parish Council	Potential for pressure on SPA	The site is not made available for consideration for development in this Draft Local Plan.
940	Shawfields and Little Shaws, Shaw Valley Road	Housing	Martlesham	Private individual	Access is an unadopted and unmade road which is not very wide and unsuitable for any extra traffic, parking or turning of larger vehicles. Site was previously concluded unsuitable and it requires adequate mitigation. Building on a flood plan and land designated countryside	The site is not made available for consideration for development in this Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					ought to be avoided.	
940	Shawfields and Little Shaws, Shaw Valley Road	Housing	Martlesham	Woodbridge Town Council	Outside of the physical limits boundary, accessed via private unsurfaced road, potential for increased pressure on Deben Estuary.	
940	Shawfields and Little Shaws, Shaw Valley Road	Housing	Martlesham	Residents of Private Road and Shaw Valley Road	Access is via a single track unmade road, no scope to extend the width. Over 60% of the site is vulnerable to standing water and is outside of the building line of Martlesham village and is designated as countryside. Development in this area would unnecessarily affect the character of this part of the village.	
940	Shawfields and Little Shaws, Shaw Valley Road	Housing	Martlesham	Private individual	Development on this site would have an unnecessary negative impact on the character of this attractive part of Martlesham and we	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					do urge you to REFUSE permission to proceed with either scheme.	
952	Land at Bealings Road	Housing	Martlesham	Martlesham Parish Council	Outside physical limits boundary, within minerals consultation area, TPO, Listed Buildings, in SLA.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
952	land at Bealings Road	Housing	Martlesham	District Councillor Kelso	Permission granted already for barn conversions, outside of physical limits boundary, within the SLA and TPOs on site.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
999	Suffolk Police HQ, Portal Avenue	Housing	Martlesham	Martlesham Parish Council	Brownfield site within physical limits boundary. Careful consideration needed for new development to be well separated from housing. Consider juxtaposition with PIC. Portal Woodlands is a TPO and contains protected species. Development to be in line with Neighbourhood Plan.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment
999	Suffolk Police HQ, Portal Avenue	Housing	Martlesham	Private individual	Exclude site from development	
999	Suffolk Police HQ, Portal Avenue, Martlesham	Housing	Martlesham	Woodbridge Town Council	We do not agree to this site	
999	Suffolk Police HQ, Portal	Housing	Martlesham	District Councillor	Brownfield site, which physical boundary, careful	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Avenue, Martlesham			Kelso	consideration would need to be given for any new development to be well separated from existing housing, any development to fall in line with the proposed Neighbourhood Plan.	
999	Suffolk Police HQ, Portal Avenue, Martlesham	Housing	Martlesham	SCC Highways	Sustainable links to Kesgrave and Martlesham required.	
1018	Land at Anson Road	Housing	Martlesham	Martlesham Parish Council	Large area of surface water flooding, County Wildlife Site, rare wildlife in adjacent wood.	Site identified as potentially suitable however the Local Plan provides an opportunity for a review of the Neighbourhood Plan to identify additional sites.
1018	Land at Anson Road, Martlesham Heath	Housing	Martlesham	Suffolk Wildlife Trust	Site includes part of Martlesham Common CWS, any development here should protect the CWS.	Site identified as potentially suitable however the Local Plan provides an opportunity

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1018	Land at Anson Road, Martlesham Heath	Housing	Martlesham	Woodbridge Town Council	Large portion of the site at risk from surface water flooding, site is also a County Wildlife Site.	for a review of the Neighbourhood Plan to identify additional sites.
1072	Land inc. superstore, Parish rooms & Beardmore Retail Park, Martlesham	District Centre	Martlesham	SCC Highways	Likely to be affected by proposed Adastral park development. Additional development in this area may be subject to cumulative impact study.	Comment noted.Site identified as unavailable in Draft SHELAA
1076	Land to the rear of Willow Brook House, Bealings Road	Housing	Martlesham	Martlesham Parish Council	Outside of Martlesham Neighbourhood Plan physical limits boundary, within Minerals Consultation Area, flooding on site, potential for pressure on SPA, TPO, BAP species, Grade II Listed Building, in SLA.	Comment noted. Site identified as unavailable in Draft SHELAA.
1076	land to the rear of Willow Brook House, Bealings Road	Housing	Martlesham	Private individual	Would lead to loss of amenity land and impact on wildlife, access is poor.	Comment noted.Site identified as unavailable in Draft SHELAA

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1076	land to the rear of Willow Brook House, Bealings Road	Housing	Martlesham	District Councillor Kelso	Outside of the physical limits boundary, tidal flood zone, increased pressure on the Deben Estuary, within the SLA, close to Listed Buildings and TPO.	
1076	land to the rear of Willow Brook House, Bealings Road	Housing	Martlesham	SCC Highways	Private road does not appear suitable to accommodate traffic and ped movements	
42	The Coalyard, Wilford Bridge Road	Housing	Melton	Woodbridge Society	Small site and suitable for development.	Comment noted. Site identified as unavailable in Draft SHELAA.
136	Land adjacent to 6 Deben Way	Employment	Melton	Woodbridge Society	Small site and suitable for development.	Comment noted. Site not preferred for allocation.
210	land at Long Springs, Woods Lane	Housing	Melton	Private individual	Development would have a high impact on Woods Lane, Air quality is an issue for residents.	Comment noted. Site not preferred for allocation.
210	land at Long Springs, Woods Lane	Housing	Melton	Private individual	Site is not appropriate for development as majority of land is under a TPO.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
210	land at Long Springs, Woods Lane	Housing	Melton	SCC Highways	May impact upon Melton crossroads without mitigation or improvement to junction	
276	Land West of Brick Kiln Lane	Mixed Use	Melton	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in an adverse impact on Deben Estuary SPA, Ramsar and SSSI adjacent.	Comment noted. Site not preferred for allocation.
276	Land West of Brick Kiln Lane	Mixed Use	Melton	Woodbridge Society	No objection to the site	
276	Land West of Brick Kiln Lane	Mixed Use	Melton	RSPB	If residential development is included, careful consideration of potential recreational impacts will be required due to their proximity to the designated sites.	
276	Land West of Brick Kiln Lane	Mixed Use	Melton	SCC Highways	Access proximity to level crossing, road alignment change may be required.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Potential impact upon nearby signalised junction may be unacceptable without mitigation.	
292	Land South of Saddlemaker's Lane, Melton	Housing and Open Space	Melton	Private individual	Development would have a high impact on Woods Lane, Air quality is an issue for residents.	Comments noted. Infrastructure constraints including Melton Crossroads.
292	Land South of Saddlemaker's Lane, Melton	Housing and Open Space	Melton	Woodbridge Society	Site is a rural part of Melton and should not be developed.	Made neighbourhood earmarks a site for new homes.
292	Land South of Saddlemaker's Lane, Melton	Housing and Open Space	Melton	Private individual	Development on this site would contribute to the overloading of already fragile road infrastructure. Poor air quality and traffic pollution is already an issue at Melton crossroads.	
346	Land east of former Girdlestons factory site, Station Road	Mixed Use	Melton	RSPB	If residential development is included, careful consideration of potential recreational impacts will be required due to their	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					proximity to the designated sites.	earmarks a site for new homes.
346	Land east of former Girdlestons factory site, Station Road	Mixed Use	Melton	Woodbridge Society	No objection to the site	
346	Land east of former Girdlestons factory site, Station Road	Mixed Use	Melton	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in an adverse impact on Deben Estuary SPA, Ramsar and SSSI adjacent.	
346	Land east of former Girdlestons factory site, Station Road	Mixed Use	Melton	SCC Highways	Access proximity to level crossing, road alignment change may be required. Potential impact upon nearby signalised junction may be unacceptable without mitigation.	
408	Land to the North of Woods	Housing	Melton	Richborough Estates	Land promoted for development.	Site is identified as potentially suitable in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane					the Draft Strategic
408	Land to the North of Woods Lane	Housing	Melton	Hopkins Homes	Land promoted for development.	Housing and Economic Land Availability Assessment. The Local Plan would support a review of the Neighbourhood Plan in bringing forward additional allocations.
408	Land to the North of Woods Lane	Housing	Melton	Private individual	Site is not appropriate for development as they would add to the already overloaded traffic infrastructure of Woods Lane a vital artery for Melton, Woodbridge and the coastal communities	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
408	Land to the North of Woods Lane	Housing	Melton	Woodbridge Society	Site suitable for development.	
408	Land to the North of Woods	Housing	Melton	Private individual	Development would have a high impact on Woods	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane				Lane, Air quality is an issue for residents.	
490	Valley Farm Melton Woodbridge	Housing/ retirement village	Melton	Private individual	Site is not appropriate for development as they would add to the already overloaded traffic infrastructure of Woods Lane a vital artery for Melton, Woodbridge and the coastal communities	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
490	Valley Farm Melton Woodbridge	Housing/ retirement village	Melton	Woodbridge Society	Site should not be developed as this will lead to ribbon development north of A12.	
490	Valley Farm Melton Woodbridge	Housing/ retirement village	Melton	Private individual	Development would have a high impact on Woods Lane, Air quality is an issue for residents.	
490	Valley Farm Melton Woodbridge	Housing/ retirement village	Melton	SCC Highways	Valley Farm Rd unsuitable for access. Direct access onto Woods Lane (or A12 if linked to adjacent sites). May impact upon Melton	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					crossroads without mitigation or improvement to junction	
539	Land North of Woods Lane Melton Woodbridge	Housing/ Care Home/ Open Space/ Office	Melton	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in additional adverse impacts on the neighbouring nature reserve.	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
539	Land North of Woods Lane Melton Woodbridge	Housing/ Care Home/ Open Space/ Office	Melton	SCC Highways	Access via A12. Potentially significant investment to provide suitable junction layout.	
645	Land at Yarmouth Road, Melton	Housing/ Care Home/ Open Space	Melton	Woodbridge Society	Site should not be developed	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
645	Land at Yarmouth Road, Melton	Housing/ Care Home/ Open Space	Melton	SCC Highways	No further comments - site subject to recent planning process.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
826	Land between St Andrews Place and El Paso, Brick Kiln Lane	Mixed use	Melton	Woodbridge Society	No objection to the site	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
826	Land between St Andrews Place and El Paso, Brick Kiln Lane	Mixed use	Melton	RSPB	If residential development is included, careful consideration of potential recreational impacts will be required due to their proximity to the designated sites.	
826	Land between St Andrews Place and El Paso, Brick Kiln Lane	Mixed use	Melton	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in an adverse impact on Deben Estuary SPA, Ramsar and SSSI adjacent.	
826	Land between St Andrews Place and El Paso, Brick Kiln Lane	Mixed use	Melton	SCC Highways	Access through minor residential roads. Potential impact upon nearby signalised junction may be unacceptable without	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					mitigation.	
993	Council Offices, Melton Hill, Melton/Woodbridge	Housing	Melton	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists wishing to visit the town. To maintain the vibrancy of the town and the economic viability of retailers, and to encourage tourism, it is essential that parking needs are catered for: parking in Woodbridge Town Centre is at capacity now and any further imposition upon it would discourage participation by local residents in the life of the town and discourage tourists from visiting it.	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
993	Council Offices,	Housing	Melton	Woodbridge	Agreed as it is in the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Melton Hill, Melton/Woodbridge			Town Council	boundary of the town and sustainable within the true sense of the word	
993	Council Offices, Melton Hill, Melton/Woodbridge	Housing	Melton	Woodbridge Society	Already been agreed suitable for housing.	
993	Council Offices, Melton Hill, Melton/Woodbridge	Housing	Melton	RSPB	Any development at this site requires full HRA, and in our opinion, is likely to require mitigation to ensure no adverse effect on the designated sites	
993	Council Offices, Melton Hill, Melton/Woodbridge	Housing	Melton	SCC Highways	Refer to recent planning application comments.	
1059	Land adj. The Woodlands, Valley Farm Lane, Melton	Housing	Melton	Woodbridge Society	Site in rural part of Melton and should not be developed.	Comments noted. Infrastructure constraints including Melton Crossroads.
1059	Land adj. The Woodlands,	Housing	Melton	Private individual	Development would have a high impact on Woods	Made neighbourhood earmarks a site for new

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Valley Farm Lane, Melton				Lane, Air quality is an issue for residents.	homes.
1059	Land adj. The Woodlands, Valley Farm Lane, Melton	Housing	Melton	Private individual	Would contribute to overloading of an already fragile road, poor air quality and traffic pollution is already an issues as identified in Melton Neighbourhood Plan.	
1059	Land adj. The Woodlands, Valley Farm Lane, Melton	Housing	Melton	SCC Highways	Valley Farm Rd unsuitable for access.	
1073	land to the rear of Fernhill Lodge, Woods Lane, Melton	Housing	Melton	Woodbridge Town Council	This looks reasonable but we don't want the A12 corridor being used for ribbon development.	Comments noted. Infrastructure constraints including Melton Crossroads. Made neighbourhood earmarks a site for new homes.
1073	land to the rear of Fernhill Lodge, Woods Lane, Melton	Housing	Melton	Private individual	Development would have a high impact on Woods Lane, Air quality is an issue for residents.	
1073	land to the rear of Fernhill	Housing	Melton	Private individual	Would contribute to overloading of an already	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lodge, Woods Lane, Melton				fragile road, poor air quality and traffic pollution is already an issues as identified in Melton Neighbourhood Plan.	
1073	land to the rear of Fernhill Lodge, Woods Lane, Melton	Housing	Melton	Woodbridge Society	Small site and suitable for development.	
47	Land adjacent to Contrive Cottage, Mill Street	Housing	Middleton	Middleton cum Fordley Parish Council	Site is not suitable, poor narrow access and doubt whether a workable solution could be achieved.	The site is not made available for consideration in the Draft Local Plan.
155	Land to the rear of Bank House, Mill Street	Housing	Middleton	Middleton cum Fordley Parish Council	Small piece of backland, totally unsuitable for development.	Comment noted. Site is not made available for consideration in the Draft Local Plan. Furthermore, the site is not considered a suitable scale for allocation.
243	Land adjacent to Vine Cottage	Housing	Middleton	Middleton cum Fordley	Site already has consent for a single dwelling.	Comment noted. Site is not made available for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Parish Council		consideration in the Draft Local Plan.
243	Land adjacent to Vine Cottage	Housing	Middleton	Suffolk Wildlife Trust	Site is adjacent to Minsmere Valley Reckford Bridge to Beveriche Manor CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	Furthermore, the site is not considered a suitable scale for allocation.
348	Land east of The Old Rectory, Back Road	Housing	Middleton	Middleton cum Fordley Parish Council	Site has considerable ecological and landscape value and is liable to flood. It is simply a non-starter.	Comment noted. Site is not made available for consideration in the Draft Local Plan.
348	Land east of The Old Rectory, Back Road	Housing	Middleton	Suffolk Wildlife Trust	Site is within Minsmere Valley Reckford Bridge to Beveriche Manor CWS and development would therefore result in a loss of CWS.	
406	land south of Back Road	Housing	Middleton	Middleton cum Fordley	Site not suitable for general housing development, but	Comment noted. Site is not made available for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Parish Council	can see scope for limited development of mainly affordable housing as an exception site.	consideration in the Draft Local Plan. Furthermore, access is considered a significant constraint.
484	Beveriche Manor Farm, Moor Road	Housing	Middleton	Middleton cum Fordley Parish Council	Site is in open countryside, well out of the village and is unsustainable by any reckoning.	Comment noted. The site is identified as not potential as it is not within, adjoining, adjacent or well related to a settlement.
961	Land at Mill Street, Middleton	Housing	Middleton	Middleton cum Fordley Parish Council	Site lies at the periphery of the built up area, but fronts a single-track road, which already suffers from congestion.	Comment noted. The site has been identified as not potential as it has only been made available for one dwelling and so is of a scale unsuitable for allocation.
1043	Land South of Back Road, fronting Fletchers Lane,	Housing	Middleton	Middleton cum Fordley Parish Council	Two applications refused in the past five years. Believe that access as proposed by the developer is acceptable.	Comments noted. The site has been identified as not potential due to significant constraints

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Middleton					regarding access.
1043	Land South of Back Road, fronting Fletchers Lane, Middleton	Housing	Middleton	Landbridge	Site is well located and forms a natural extension to the built environment. Site is suitable, achievable and capable of delivery.	
309	Land at New Dawn and Shenandoah, Chediston Green	Housing	Monewden	Cretingham, Monewden & Hoo Parish Council	It is requested that this land be taken out of the local plan please as being totally unsuitable and unsustainable.	Comment noted. he site is not a preferred site as sites elsewhere in the District are more suitable for allocation.
807	Land east of the Moat House, Rookery Road	Affordable housing	Monewden	Cretingham, Monewden & Hoo Parish Council	It is requested that this land be taken out of the local plan please as being totally unsuitable and unsustainable.	Comments noted.Site identified as unavailable in Draft SHELAA
807	Land east of the Moat House, Rookery Road	Affordable housing	Monewden	SCC Highways	Adjacent roads narrow without footways. Widening and footways required to accommodate developments of this scale.	
769	Land Adjacent to The Meadows	Housing	Monewden	Cretingham, Monewden	It is requested that this land be taken out of the local	Comment noted. The site is not a preferred

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				& Hoo Parish Council	plan please as being totally unsuitable and unsustainable.	site as sites elsewhere in the District are more suitable for allocation.
808	land to the South of The Meadows	Affordable housing	Monewden	Cretingham, Monewden & Hoo Parish Council	It is requested that this land be taken out of the local plan please as being totally unsuitable and unsustainable	The site is not made available for development in the Draft Local Plan.
808	land to the South of The Meadows	Affordable housing	Monewden	SCC Highways	Adjacent roads narrow without footways. Widening and footways required to accommodate developments of this scale	
809	Land adjacent to St Mary's Church, Church Road	Housing	Monewden	Cretingham, Monewden & Hoo Parish Council	It is requested that this land be taken out of the local plan please as being totally unsuitable and unsustainable	The site is not made available for consideration in the Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
809	Land adjacent to St Mary's Church, Church Road	Housing	Monewden	SCC Highways	Adjacent roads narrow without footways. Widening and footways required to accommodate developments of this scale	
186	Land adjacent to the Sheperd and Dog Piggeries, Felixstowe Road	Employment	Nacton	Levington and Stratton Hall Parish Council	Consider site appropriate	Site part of existing allocation SSP20
566	Land at Orwell Park Gardens, off Church Road, IP10 OEW	Housing	Nacton	Artisan PPS Ltd	Site promoted by landowner for residential use.	Comments noted. The site is not identified as a potential site in the Draft SHELAA reflecting that it is adjacent grade 2 listed Orwell School and Observatory. Part of the locally identified historic park and garden of Orwell Park. Brick boundary walls to 2 elevations are a non designated heritage

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						asset.
285	Land rear of The Old Piggery, Mill Road	Mixed Use	Newbourne	Pomery Planning Consultants	Site promoted for residential or employment development by landowner.	Comments noted. There are specific policies in the Draft Plan that reflect the unique character of Newbourne.
285	Land rear of The Old Piggery, Mill Road	Mixed Use	Newbourne	Private individual	Site has excellent potential for mixed development, currently a brownfield horticultural site.	
285	Land rear of The Old Piggery, Mill Road	Mixed Use	Newbourne	Private individual	Site outside of the village envelope, overlooks SSSI and nature reserve and brown field site. At present site is open and raw and would need careful boundary planting to reduce impact.	
396	land to the rear of 4 Ipswich	Housing and leisure	Newbourne	Suffolk Wildlife	Site is adjacent to Newbourne Springs SSSI	Comments reflected in the site not being

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road			Trust	and Suffolk Wildlife Trust reserve. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	allocated for development. Impact on nature reserve and SSSI. The site has been identified as not suitable through the Draft Strategic Housing and Economic Land
396	land to the rear of 4 Ipswich Road	Housing and leisure	Newbourne	Private individual	Entirely inappropriate for development, outside of village envelope and could have disastrous effect on nearby SSSI and nature reserve.	Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
396	land to the rear of 4 Ipswich Road	Housing and leisure	Newbourne	Private individual	Site outside of the village envelope, overlooks SSSI and nature reserve and brown field site. At present site is open and raw and would need careful boundary planting to reduce impact.	
501	Newbourne	Housing	Newbourne	Newbourne	The Parish Council would	Comments noted. There

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Business Park, Mill Road, IP12 4NP			Parish Council	like to know the plans for the site before objecting or supporting this.	are specific policies in the Draft Plan that reflect the unique character of Newbourne.
501	Newbourne Business Park, Mill Road, IP12 4NP	Housing	Newbourne	Private individual	Potential development for this site is logical and long overdue.	
501	Newbourne Business Park, Mill Road, IP12 4NP	Housing	Newbourne	Private individual	Site outside of the village envelope, overlooks SSSI and nature reserve and brown field site. At present site is open and raw and would need careful boundary planting to reduce impact.	
501	Newbourne Business Park, Mill Road, IP12 4NP	Housing	Newbourne	Evolution Town Planning	Site promoted by landowner for residential use.	
504	Newbourne Business Park, Mill Road	Housing	Newbourne	Evolution Town Planning	Site is previously developed land and promoted for housing.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and Economic Land Availability Assessment however due to the unique circumstances and character of Newbourne and its proximity to Brightwell Lakes, it is not considered appropriate to allocate sites in the Local Plan
40	Land opposite Daphne House, Daphne Road	Housing	Orford	Private individual	Object to the site, it is in flood zone and any new buildings would not be in character with the village.	Comments noted and the site is not proposed for allocation. It is understood to have capacity for only 1 dwelling.
40	Land opposite Daphne House, Daphne Road	Housing	Orford	Private individual	Object to the development in terms of flood risk, loss of amenity, increase traffic and access across a registered village green	
40	Land opposite Daphne House, Daphne Road	Housing	Orford	Suffolk Wildlife Trust	Site is in close proximity to the Alde-Ore Estuary SPA, Alde-Ore and Butley	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Estuaries SAC, Alde-Ore Estuary Ramsar site and the Alde-Ore Estuary SSSI. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	
410	land south of Daphne Road	Housing	Orford	Private individual	Object to the site, it is in flood zone and any new buildings would not be in character with the village.	The site is not made available for consideration for development in this Draft Local Plan.
410	land south of Daphne Road	Housing	Orford	Private individual	Object to the development in terms of flood risk, loss of amenity, increase traffic and access across a registered village green	
410	land south of Daphne Road	Housing	Orford	Suffolk Wildlife Trust	Site is in close proximity to the Alde-Ore Estuary SPA, Alde-Ore and Butley Estuaries SAC, Alde-Ore Estuary Ramsar site and the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Alde-Ore Estuary SSSI. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	
540	Land off Daphine Road	Housing	Orford	Private individual	Object to the site, it is in flood zone and any new buildings would not be in character with the village.	Comment noted. Site not proposed for allocation reflecting vehicle access.
540	Land off Daphine Road	Housing	Orford	Private individual	Object to the development in terms of flood risk, loss of amenity, increase traffic and access across a registered village green	
540	Land off Daphine Road	Housing	Orford	Suffolk Wildlife Trust	Site is in close proximity to the Alde-Ore Estuary SPA, Alde-Ore and Butley Estuaries SAC, Alde-Ore Estuary Ramsar site and the Alde-Ore Estuary SSSI. Further assessment is	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					required to determine whether development in this location is likely to result in an adverse impact on these sites.	
98	Land north of the Depot, Church Road	Housing	Otley	Private individual	Exclude this site from development	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment – However, it was deemed Sites 465 and 764 (site allocations: SCLP12.54 and SCLP12.55) are more suitable for allocation as site has potential access issues.
98	Land north of the Depot, Church Road	Housing	Otley	Otley Parish Council	In principal the site could have small development potential, although the Parish Council would strongly object to any	Comments and infrastructure issues reflected in the site not being proposed for allocation in the Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development beyond the physical limits boundary.	Local Plan.
98	Land north of the Depot, Church Road	Housing	Otley	Private individual	Site on the map does not reflect the actual boundaries. Site is important for wildlife. Site will require remediation due to former timber yard operations and outside of the village envelope.	
370	Land rear of St. Mary's Church, Church Road, Otley	Area to be Protected from Development	Otley	Otley Parish Council	Site is part of setting and back drop of the church, would be inappropriate to allow development of any nature, but support a section of the site to be used for additional burial ground.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
457	Land South of	Housing	Otley	Otley Parish	Site is part of the setting of	The site has been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Church Farm House, Church Road, Otley			Council	the church and inappropriate for development.	identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
457	Land South of Church Farm House, Church Road, Otley	Housing	Otley	Landowner	Site promoted for residential use which would enhance to local facilities and support local shops, schools and road structure.	
465	Land Bounded by Helmingham Road & Ipswich Road, Otley	Housing	Otley	Otley Parish Council	Site is out of the physical limit boundary. The loss of visual amenity would be detrimental to the character of Otley. There is no footpath. An unrealistic suggestion of 20 houses for this plot.	The comments have been considered in identifying preferred sites. Otley is identified as a large village in the settlement hierarchy and has potential for some growth. The policy directs development to the southern part of the site and requires retention of hedgerows and trees where possible.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
764	Land at Chapel Road	Housing and Open space	Otley	Otley Parish Council	Land is inappropriate. It is outside the physical limits boundary. Such development would extend into the countryside; the countryside must avoid encroachment and therefore remain undeveloped. A large estate type development would be inconsistent with the scale and character of Otley.	The comments have been considered in identifying preferred sites. Otley is identified as a large village in the settlement hierarchy and has potential for some growth. The policy requires landscaping to provide a 'soft' edge in relation to the edge of the settlement. The policy also requires pedestrian connections to the existing footpath on the south of Chapel Road.
764	Land at Chapel Road	Housing and Open space	Otley	Landbridge	Site promoted by landowner for residential use.	
764	Land at Chapel Road	Housing and Open space	Otley	SCC Highways	Footway along frontage and linking to existing footway on Chapel Road required	
771	Land adjacent to Swiss Cottage Farm	Housing	Otley	Otley Parish Council	Land is unsuitable, development of this scale is disproportionate to the size of Otley and would damage natural character of the	Comments and complexities of allocating only part of the site reflected in it not being proposed for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					village. Site is also outside of the physical limits boundary.	allocation in the Draft Plan.
771	Land adjacent to Swiss Cottage Farm	Housing	Otley	SCC Highways	Direct access onto Chapel road required.	
772	Land North of Swiss Cottage Farm	Housing	Otley	Otley Parish Council	Land is unsuitable, development of this scale is disproportionate to the size of Otley and would damage natural character of the village. Site is also outside of the physical limits boundary.	Comments concerning the scale of development reflected in it not being proposed for allocation in the Draft Plan.
772	Land North of Swiss Cottage Farm	Housing	Otley	Landbridge	Site promoted by landowner for residential use.	
772	Land North of Swiss Cottage Farm	Housing	Otley	SCC Highways	Improvements to local junctions and ped crossing facilities to accommodate this level of development.	
1001	Land north of Otley House,	Housing	Otley	Otley Parish Council	Site is out of the physical limit boundary. There is no	Comments reflected in the site not being

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Helmingham Road, Otley				footpath. An unrealistic suggestion of 9 houses for this plot. It is currently a wooded area providing environmental benefits to the village and wildlife.	proposed for allocation for development.
1036	Land rear of St. Mary's Church, Church Road, Otley	Housing	Otley	Otley Parish Council	Site is part of setting and back drop of the church, would be inappropriate to allow development of any nature,	The site is not made available for consideration for development in this local plan.
1036	Land rear of St. Mary's Church, Church Road, Otley	Housing	Otley	SCC Highways	Appears to require adjacent sites to link to Church Road	
1051	Land at Wood Farm, Helmingham Road, Otley	Housing	Otley	Otley Parish Council	Parish Council is against development on this site, outside of the physical limits boundary and no	The site has been identified as not suitable for housing development through

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					footpath.	the Draft Strategic
1051	Land at Wood Farm, Helmingham Road, Otley	Housing	Otley	Private individual	Site would require footpath linking development to the Ipswich Road junction. Otley requires units for people wanting to downsize or affordable starter homes. Believe that 10-12 houses would be enough on this site.	Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
55	Land opposite Willoughby Villa, Main Road	Housing	Parham	Parham Parish Council	Any future development within Parham needs to be proportionate to the scale of the village and comprise mix of open market value houses and affordable houses with design and character an important consideration.	The site is not available for consideration in the Draft Local Plan.
250	Land north of White House	Housing	Parham	Parham Parish	Any future development within Parham needs to be	The site is not available for consideration in the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Farm			Council	proportionate to the scale of the village and comprise mix of open market value houses and affordable houses with design and character an important consideration.	Draft Local Plan.
359	Land north of Park Farm Cottages	Affordable Housing	Parham	Parham Parish Council	Any future development within Parham needs to be proportionate to the scale of the village and comprise mix of open market value houses and affordable houses with design and character an important consideration.	The site is not available for consideration in the Draft Local Plan.
360	Land south and east of Green Farm Cottage, North Green	Affordable Housing	Parham	Parham Parish Council	Any future development within Parham needs to be proportionate to the scale of the village and comprise mix of open market value houses and affordable houses with design and	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					character an important consideration.	Assessment as it is not within, adjoining or well related to the form of the settlement.
2	Adjacent to Primary School, Hackney Road	Housing	Peasehall	Peasehall Parish Council	Site forms part of centre for recreation, leisure and sporting activities in the village and cannot be lost to development.	Site identified as unavailable in Draft SHELAA.
2	Adjacent to Primary School, Hackney Road	Housing	Peasehall	Private individual	A development on the west of the site in conjunction with the school might be viable. Development to the east could be enhanced near the village hall to provide much needed amenities in the village.	
2	Adjacent to Primary School, Hackney Road	Housing	Peasehall	Private individual	Around the village hall, the vehicular access to this land is already very dangerous & the village generally enjoys access to this whole area.	
37	Land adjacent	Housing	Peasehall	Private	Site on the causeway seems	Comments noted. Based

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Bridge Cottages, The Causeway			individual	like a good way of tidying-up the centre of the village to us, especially if the adjacent listed property is restored at the same time & the red phone box is retained in a new position by the planned bridge.	on information available environmental, highways and infrastructure issues are the basis for not allocating the site. It is considered that more suitable sites exist elsewhere in the District.
37	Land adjacent Bridge Cottages, The Causeway	Housing	Peasenhall	Suffolk Wildlife Trust	Great crested newts are known at the site, further assessment is required to determine whether development in this location is likely to result in an adverse impact on great crested newts.	
37	Land adjacent Bridge Cottages, The Causeway	Housing	Peasenhall	Private individual	Site is designated allotments and is artificially empty.	
37	Land adjacent Bridge Cottages, The Causeway	Housing	Peasenhall	Peasenhall Parish Council	This site is currently the subject of a planning application. It has a centre village location and part of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the proposal is a package of community benefit in the form of a play area and allotments. The Parish Council continues to support the inclusion of this site in the plan.	
71	Land adjacent to The Glen, Bruisyard Road	Housing	Peasenhall	Landowner	Land is under our ownership and not available for development.	The site is not made available for consideration for development in the Draft Local Plan.
71	Land adjacent to The Glen, Bruisyard Road	Housing	Peasenhall	Private individual	It has poor access because of the nature of Bruisyard Road or having to cross the stream to Hackney Road.	
71	Land adjacent to The Glen, Bruisyard Road	Housing	Peasenhall	Peasenhall Parish Council	The Parish Council supports the inclusion of this site for possible future development but only on the basis that it forms a much larger allocation to include the field to the west	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
312	Land at The Club, Pouy Street	Land at The Club, Pouy Street	Peasehall	Peasehall Parish Council	The Parish Council supports the inclusion of this small site with potential for 2 or 3 dwellings	The site is too small to allocate in the Draft Local Plan.
380	land east of Newlands, Mill Road	Housing	Peasehall	Peasehall Parish Council	The Parish does not support inclusion of this site. Development in this area would be accessed onto the existing rural road network which is narrow with dangerous junctions, particularly that at Emmetts Corner. Any development would increase traffic creating a worsening problem for road users.	Comments and highways issues reflected in the site not being proposed for allocation for development in the Draft Local Plan.
718	Land adjoining Russell Close, Badingham road, Peasehall	Housing	Peasehall	Peasehall Parish Council	The Parish Council does not support inclusion of this site for possible future development. The existing Russell Close development was considered as an exemption site due to its	Comments reflected in the site not being proposed for allocation for development in the Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					social housing element. This proposal is further outside of the village envelope and will extend development into the open countryside to the west and south.	
718	Land adjoining Russell Close, Badingham road, Peasenhall	Housing	Peasenhall	Private individual	Site likely to be used for affordable housing, site in agricultural use at edge of village.	
719	Land at Low Farm Bungalow, Peasenhall, IP17 2JN	Housing	Peasenhall	Peasenhall Parish Council	The Parish Council does not support inclusion of this site for future development. It is on the very edge of and unrelated to the core of the village and development of the site would be an unwelcome encroachment into the open countryside at this location.	Comments noted. The site is not proposed for allocation reflecting flood risk and environmental impacts.
719	Land at Low Farm Bungalow, Peasenhall, IP17	Housing	Peasenhall	Private individual	Edge of the village in conservation area	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	2JN					
778	Land East of Mill Rise	Housing	Peasehall	Peasehall Parish Council	The Parish does not support inclusion of this site. Development in this area would be accessed onto the existing rural road network which is narrow with dangerous junctions, particularly that at Emmetts Corner. Any development would increase traffic creating a worsening problem for road users.	Comments reflected in the small site not being proposed for allocation in the Draft Local Plan.
778	Land East of Mill Rise	Housing	Peasehall	Private individual	Land forming amenity land to Old Vicarage	
779	Land West of Mill Rise	Housing	Peasehall	Peasehall Parish Council	The Parish does not support inclusion of this site. Development in this area would be accessed onto the existing rural road network which is narrow with dangerous junctions, particularly that at Emmetts	Comments reflected in the small site not being proposed for allocation in the Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Corner. Any development would increase traffic creating a worsening problem for road users.	
779	Land West of Mill Rise	Housing	Peasehall	Private individual	Woodland area part of village landscape	
988	Land opposite 1-9 Oak View, Mill Hill, Peasehall	Housing	Peasehall	Peasehall Parish Council	In the previous plan consultations the development of this site was supported and it was included within the physical limits boundary. The Parish Council continues to support the inclusion of this site but would wish to see the potential number of dwellings reduced.	Site not proposed for allocation for highways reasons.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1042	Land at Sibton Road opposite Peasenhall & Sibton Methodist Church	Housing	Peasenhall	Peasenhall Parish Council	The Parish Council are not in favour of development of this site. Only a small part of the site is included within the physical limits boundary. Part of the site has the potential to flood according to the Environment Agency that would restrict any large scale development proposals. The site provides an important open aspect entrance to the village.	Comments noted. Site not proposed for allocation for development in the Draft Local Plan reflecting landscape evidence.
1042	Land at Sibton Road opposite Peasenhall & Sibton Methodist Church	Housing	Peasenhall	Private individual	Site suitable for old peoples homes or bungalows.	
1042	Land at Sibton Road opposite	Housing	Peasenhall	Private individual	Site was rejected on last call for sites and nothing has	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Peasenhall & Sibton Methodist Church				changed. Peasenhall is not a Key Service Centre and building of this scale would only add to the environmental impact of residents. Development on this site would alter the charm and aesthetic appearance of the village.	
73	Land adjacent to Three Tuns PH, The Street	Housing	Pettistree	Peter Wells Architects	Land promoted by landowner for residential use.	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
1121	Land between High Street and Chapel Lane	Housing	Pettistree	Wickham Market Parish	Site is a prime site for development	Site has been identified as a preferred site for allocation.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	(Wickham Market)			Council		
870	Land at Kiln Farm, Main Road	Housing	Playford	Private individual	Exclude this site from development	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment  Comments noted however site is not available for consideration in the Local Plan.
870	Land at Kiln Farm, Main Road	Housing	Playford	Private individual	Not sustainable location	
870	Land at Kiln Farm, Main Road	Housing	Playford	Turnberry Planning Ltd	Concerned that further development of this site will risk creating urban sprawl between Rushmere St Andrew and Kesgrave.	
870	Land at Kiln Farm, Main Road	Housing	Playford	Rushmere St Andrew Parish Council	Potential massive development which would have a detrimental impact on traffic and would lose the village outlook	
870	Land at Kiln Farm, Main Road	Housing	Playford	SCC Highways	Some narrow country lands would require improvement or realignment. Scheme has	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the ability to deliver long distance sustainable links from Kesgrave to the edge of Ipswich and these would need to be secured as part of a wider review of links to Ipswich.	
146	Land at and surrounding Purdis Rise, Purdis Farm Lane	Housing	Purdis Farm	Greenways Project	Further development in this area would have an adverse impact on SSSI.	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
146	Land at and surrounding Purdis Rise, Purdis Farm Lane	Housing	Purdis Farm	Suffolk Wildlife Trust	Site is adjacent to part of the Ipswich Heaths SSSI and Ipswich Golf Course CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	Site not made available for consideration in the Local Plan strategy.
146	Land at and surrounding	Housing	Purdis Farm	SCC Highways	Significant footway improvements to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Purdis Rise, Purdis Farm Lane				Bucklesham Road and Purdis Farm Lane required. Latter is private.	
195	Purdis Croft, Bucklesham Road	Housing	Purdis Farm	Suffolk Wildlife Trust	Site is adjacent to part of the Ipswich Heaths SSSI. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	Comment and Local Plan spatial strategy reflected in the site not being allocated.
451	Land to the North and East of Redwald Road Rendlesham	Housing Care Home Open Space	Rendlesham	Richard Brown Planning Limited	Site promoted by landowner for residential use.	Comments noted. Part of the site is one of sites previously allocated in Rendlesham in the Site
451	Land to the North and East of Redwald Road Rendlesham	Housing Care Home Open Space	Rendlesham	SCC Highways	Footway links into Rendlesham required. May impact upon Melton crossroads without mitigation or improvement to junction	Allocations and Area Specific Policies DPD are carried forward to meet the Local Plan strategy for housing growth.
482	Old usaf site opposite tower	Any	Rendlesham	David Houchell	Site is definitely brown field site and suitable for various	Comment noted. Sites previously allocated in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	field road			Ltd	types of development.	Rendlesham in the Site Allocations and Area Specific Policies document are carried forward to meet the Local Plan strategy for housing growth.
506	Land to the rear of 3 - 33 Suffolk Drive, Rendlesham	Housing	Rendlesham	SCC Highways	Adjacent to private road. Consider access links to site from A1152	Comment noted. Sites previously allocated in Rendlesham in the Site Allocations and Area Specific Policies document are carried forward to meet the Local Plan strategy for housing growth.
506	Land to the rear of 3 - 33 Suffolk Drive	Housing	Rendlesham	Trustees of Bunbury	Land promoted for development	Site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Assessment however the Local Plan does not allocate additional sites in Rendlesham.
698	Bentwaters Park, Rendlesham, IP12 2TW	Housing	Rendlesham	RSPB	Development in this area could result in increased recreational disturbance to the nearby Sandlings SPA. Any proposed allocation must undergo HRA to consider the potential impacts of new development close to this site and ensure that it is not adversely affected	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
698	Bentwaters Park, Rendlesham, IP12 2TW	Housing	Rendlesham	SCC Highways	Bentwaters Park currently has limited traffic generation in accordance with conditions 3 & 4 of planning permission C/10/3239	
699	Bentwaters Park	Housing /Holiday Lets	Rendlesham	Bentwaters Parks Ltd	Site also put forward for housing, in addition to	Site noted as being available for holiday lets

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					holiday lets previously submitted.	and housing. Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
699	Bentwaters Park, Rendlesham, IP12 2TW	Holiday lets	Rendlesham	RSPB	Development in this area could result in increased recreational disturbance to the nearby Sandlings SPA. Any proposed allocation must undergo HRA to consider the potential impacts of new development close to this site and ensure that it is not adversely affected	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
699	Bentwaters Park, Rendlesham, IP12 2TW	Holiday lets	Rendlesham	SCC Highways	Development in Rendlesham will impact on the Woods Lane cross roads in Melton which is already at capacity. However, depending on the site arrangements the main	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					impacts of holiday uses may not have the same peak impacts as a similar sized residential use. However annual, monthly and daily traffic flow limits have been set for this area which are already close to being met by the baseline traffic. Therefore any significant development would have to demonstrate that these thresholds would not be exceeded.	
88	Land at 868A and 876 Foxhall Road	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Site is adjacent to Ipswich Golf Course CWS and the Mount CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	Comments noted. Site not proposed for allocation due to unsuitable highways access.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
88	Land at 868A and 876 Foxhall Road	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Natural extension of Brookhill Park – acceptable providing no direct access onto Foxhall Road at the bend/hill top. Alternative access may be further along Foxhall Road.	
88	Land at 868A and 876 Foxhall Road	Housing	Rushmere St Andrew	Private individual	Site promoted for residential use.	
88	Land at 868A and 876 Foxhall Road	Housing	Rushmere St Andrew	SCC Highways	Unlikely that adequate visibility achievable due to bends in road	
182	Land off Tuddenham Lane, Adjacent to Millbank House	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Unsustainable – poor infrastructure (Lamberts Lane) – single track and separate from the main village.	Site not made available for consideration in the Local Plan.
332	Land at and south of 4 Playford Road	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Already has planning permission	Comment noted. Small site not proposed for allocation.
353	Land at	Housing	Rushmere St	Rushmere	As owners of site 353 we	Site not available for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Rushmere St Andrew Sports Club		Andrew	St Andrew Parish Council	have no intention to develop the site and wish to retain it as a sporting facility currently under the tenure of the Ipswich School Sports Centre. It has already been partly developed at Eaton Place (as an enabling development to finance refurbishment of the site facilities).	consideration in the Local Plan.
353	Land at Rushmere St aAndrew Sports Club	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
353	Land at Rushmere St aAndrew Sports Club	Housing	Rushmere St Andrew	SCC Highways	No foot ways on The Street – required.	Site not available for consideration in the Local Plan.
474	Land adjacent to Bixely Drive	Housing	Rushmere St Andrew	Rushmere St Andrew	Potentially acceptable site.	Site not proposed for allocation reflecting

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Parish Council		deliverability uncertainties and the spatial strategy for the distribution of new housing across the District. The site is within the settlement boundary and in principle could therefore come forward under Policy SCLP3.4.
953	Land between Playford Road and Bent Lane, opposite sports fields	Housing	Rushmere St Andrew	London and Merchant Properties	Land promoted for development.	Comments noted. Land not identified as a preferred site due to potential loss of playing fields and the strategy of the Local Plan does not focus growth in the east of Ipswich.
953	Land between Playford Road and Bent Lane, opposite sports fields	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	
953	Land between	Housing	Rushmere St	Rushmere	Must be retained as	Comments around

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Playford road and Bent Lane, opposite sports fields		Andrew	St Andrew Parish Council	sporting facilities for the community.	sports facilities and highways reflected in the site not being proposed for allocation for housing development in the Draft Local Plan.
953	Land between Playford road and Bent Lane, opposite sports fields	Housing	Rushmere St Andrew	SCC Highways	Footway improvement required on Playford Road and potentially also Bent Lane.	
994	Land to north of Playford Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – significant constraints regarding access.
994	Land to north of Playford Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Site is outside the PLB and access along Playford Lane would be unrealistic.	Comments noted, site identified as unsuitable due to significant access constraints.
994	Land to north of Playford Lane,	Housing	Rushmere St Andrew	Suffolk Wildlife	Sites represent a large block of land which is likely to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Rushmere St Andrew			Trust	contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town.	
1060	Land at Ipswich Town Football Club training ground, Playford Road, Rushmere St Andrew	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
1060	Land at Ipswich Town Football	Playing fields	Rushmere St Andrew	Rushmere St Andrew	Must be retained as sporting facilities for the	Site is not available for housing or employment

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Club training ground, Playford Road, Rushmere St Andrew			Parish Council	community.	uses.
1060	Land at Ipswich Town Football Club training ground, Playford Road, Rushmere St Andrew	Playing fields	Rushmere St Andrew	SCC Highways	Playford Road footway would require widening. Assess in conjunction with adjacent sites.	
1082	Land North of Humber Doucy Lane (open space), Rushmere St Andrew	Open Space / Playing Field	Rushmere St Andrew	Rushmere St Andrew Parish Council	In isolation. It has extremely poor access.	
1082	Land North of Humber Doucy Lane (open space), Rushmere St Andrew	Land North of Humber Doucy Lane	Rushmere St Andrew	Kesgrave Covenant	Land promoted for development	Issues relating to access and existing provision of open space and green infrastructure.
1083	Land opposite	Housing	Rushmere St	Kesgrave	Land promoted for	Site identified as

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	309-405 Humber Doucy Lane,		Andrew	Covenant	development	potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment however infrastructure constraints exist in relation to highways and education around this part of Ipswich and growth in this part of the District is not central to the Local Plan strategy. It was deemed sites elsewhere in the district were more suitable for allocation.
1083	Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the	Comments noted. The site would need to be taken forward in conjunction with plans and strategies for adjoining land in Ipswich Borough. The strategy

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town	for the Local Plan does not focus growth around Ipswich.
1083	Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	SCC Highways	Significant improvement to Tuddenham Lane required to accommodate traffic and ped use. Suitability of site may be influenced by Ipswich northern bypass. Assess in conjunction with adjacent sites.	
1084	Land off Rushmere Road and Humber Doucy Lane	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						constraints exist in relation to highways and education around this part of Ipswich and growth in this part of the District is not central to the Local Plan strategy. It was deemed sites elsewhere in the district were more suitable for allocation.
1084	Land off Rushmere Road and Humber Doucy Lane	Housing	Rushmere St Andrew	Greenways Project	Existing wildlife, primarily hedgerows, should be protected. Enhancement through creation of new semi natural habitat.	Comments noted, however site not proposed for development.
1084	Land off Rushmere Road and Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the	Comments noted. Site not preferred having regard to the emerging spatial strategy for housing growth and highways and sports provision constraints.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town	
1084	Land off Rushmere Road and Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Development of these sites would be contrary to SSP36 of the existing Local Plan.	
1084	Land off Rushmere Road and Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	SCC Highways	Significant improvement to Humber Doucy Lane required to accommodate traffic and ped use. Suitability of site may be influenced by Ipswich northern bypass. Assess in conjunction with adjacent	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sites.	
1085	Humber Doucy Lane, adjacent to Wanderers football club, Rushmere St Andrew	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment however infrastructure constraints exist in relation to highways and education around this part of Ipswich and growth in this part of the District is not central to the Local Plan strategy. It was deemed sites elsewhere in the district were more suitable for allocation.
1085	Humber Doucy Lane, adjacent to Wanderers football club, Rushmere St	Housing	Rushmere St Andrew	Greenways Project	Existing wildlife, primarily hedgerows, should be protected. Enhancement through creation of new semi natural habitat.	Comments noted, however site not proposed for development.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Andrew					
1085	Humber Doucy Lane, adjacent to Wanderers football club, Rushmere St Andrew	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town	Comments noted. Site not preferred having regard to the emerging spatial strategy for housing growth and highways and sports provision constraints.
1085	Humber Doucy Lane, adjacent to Wanderers football club, Rushmere St Andrew	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Must be retained as sporting facilities for the community. Development of these sites would be contrary to SSP36 of the existing Local Plan.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
1085	Humber Doucy Lane, adjacent to Wanderers football club, Rushmere St Andrew	Housing	Rushmere St Andrew	SCC Highways	Significant improvement to Humber Doucy Lane required to accommodate traffic and ped use. Suitability of site may be influenced by Ipswich northern bypass. Assess in conjunction with adjacent sites.	
1087	Land at and surrounding Hill Farm, Lamberts Lane	Housing	Rushmere St Andrew	Bloor Homes	Land promoted for development.	Strategic scale site that does not fit with the emerging spatial strategy of this Local Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests reflected in the Draft SHELAA.
1087	Land at and surrounding Hill Farm, Lamberts Lane	Housing	Rushmere St Andrew	Tuddenham St Martin Parish Council	Would add to lack of separation between Ipswich and villages and have a negative impact on highways and education.	
1087	Land at and surrounding Hill Farm, Lamberts Lane	Housing	Rushmere St Andrew	Greenways Project	Not suitable for large scale development but could provide opportunities for creation of 'green rim'. Wildlife value in southern	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					section should be protected. Creation of semi natural green space.	
1087	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town	Strategic scale site that does not fit with the emerging spatial strategy of this Local Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests reflected in the Draft SHELAA.
1087	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere	Housing	Rushmere St Andrew	Rushmere St Andrew Parish Council	Unsustainable development, would be a massive extension to the village and require massive	Strategic scale site that does not fit with the emerging spatial strategy of this Local

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	St Andrew				infrastructure uplift with no links to existing feeder roads.	Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests reflected in the Draft SHELAA.
1087	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Woodbridge Town Council	Site would lead to massive encroachment of greater Ipswich and there is too much development in the Eastern corridor as it is; we certainly would not wish to see this continue.	Strategic scale site that does not fit with the emerging spatial strategy of this Local Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests reflected in the Draft SHELAA.
1087	Land at and	Housing	Rushmere St	Strutt &	Site promoted by	Strategic scale site that

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew		Andrew	Parker LLP	landowner for residential use.	does not fit with the emerging spatial strategy of this Local Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests reflected in the Draft SHELAA.
1087	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	SCC Highways	Lamberts Lane is a very narrow country lane that would require considerable widening to make it suitable for any increase in traffic. Holly Lane is also not suitable. Humber Doucy Lane would also require improvement along the whole length and the junctions with Tuddenham	Strategic scale site that does not fit with the emerging spatial strategy of this Local Plan. Would require a strategic approach with infrastructure providers and Ipswich Borough not least in terms of highways. Natural environment interests

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Road and Rushmere Road would need improvement. Multiple points of access would be required which would be difficult to achieve given the site is bordered by the railway line to the north.	reflected in the Draft SHELAA.
1089	Land off Rushmere Road and Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Private individual	Exclude this site from development	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment – However, it was deemed sites elsewhere in the district were more suitable for allocation. Natural environment interests reflected in the Draft SHELAA.
1089	Land off Rushmere Road and Humber	Housing	Rushmere St Andrew	Greenways Project	Existing wildlife, primarily hedgerows, should be protected. Enhancement	Comments noted, however site not proposed for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Doucy Lane, Rushmere St Andrew				through creation of new semi natural habitat.	development. Natural environment interests reflected in the Draft SHELAA.
1089	Land off Rushmere Road and Humber Doucy Lane, Rushmere St Andrew	Housing	Rushmere St Andrew	Suffolk Wildlife Trust	Sites represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town	Comments noted. Site not preferred in relation to the emerging spatial strategy for housing growth. Natural environment interests reflected in the Draft SHELAA.
1089	Land off Rushmere Road and Humber	Housing	Rushmere St Andrew	Rushmere St Andrew Parish	Development of these sites would be contrary to SSP36 of the existing Local Plan.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Doucy Lane, Rushmere St Andrew			Council		
33	Land adjacent to Fromus House, Street Farm Road	Car park	Saxmundham	Saxmundham Town Council	We would in principle support possible public car parking use.	Comment noted. However, the site is not available for development.
123	Land at Carlton Gate, Brook Farm Road	Housing	Saxmundham	Private individual	I consider the reasons stated by the local planning authority for requiring this designation in the current local plan remain true and relevant today and thus I consider this protected status designation should be carried forward in to the new local plan	Site identified as unavailable in Draft SHELAA.
435	Land north and east of The Manor House, Church Hill	Housing	Saxmundham	Hopkins Homes	Unsustainable location due to distance from town centre, open landscape character and narrow road frontage.	Site not proposed for allocation as not of sufficient scale to accommodate strategic scale of growth.
435	Land north and	Housing	Saxmundham	Private	Clarification that only	Site has been amended

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	east of The Manor House, Church Hill			Individual	southern part of site is available. Land promoted for development.	to exclude the northern part. Site has been considered as part of assessment of options for Saxmundham, however it is concluded that development to the south of Saxmundham would enable a comprehensive approach to be taken on one site.
435	land north and east of The Manor House, Church Hill	Housing	Saxmundham	EDF Energy	Potential for infrastructure improvements to be required to the railway in this area. EDF requests that account is taken of the potential need for improvement works to the rail line in this area.	Comments noted. The site is not a preferred site as sites elsewhere in the Town are more suitable for allocation, considering the infrastructure issues. Additionally, the site allocation SCLP12.26 to the South of Saxmundham is
435	land north and east of The Manor House,	Housing	Saxmundham	SCC Highways	Potential impact upon Church Street signalised junction. Detailed analysis	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Church Hill				and potential mitigation required	expected to bring forward significant infrastructure improvements.
436	land north of The Manor House, Church Hill	Housing	Saxmundham	EDF Energy	Potential for infrastructure improvements to be required to the railway in this area. EDF requests that account is taken of the potential need for improvement works to the rail line in this area.	Comments noted. The site is an existing site allocation carried forward into the First Draft Local Plan. Infrastructure improvements will be sought where possible.
436	land north of The Manor House, Church Hill	Housing	Saxmundham	SCC Highways	Improvements to Street farm Rd required	The site allocation SCLP12.26 to the South of Saxmundham is expected to bring forward significant infrastructure improvements.
559	Land at The Manor House, Church Hill	Housing and open space	Saxmundham	Hopkins Homes	This is the only suitable site to the east of Saxmundham however it would not deliver the scale of growth	Site not proposed for allocation as not of sufficient scale to accommodate strategic

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					required.	scale of growth.
559	Land at The Manor House, Church Hill	Housing and open space	Saxmundham	Private Individual	Land promoted for development.	Site identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability Assessment however land to the south of Saxmundham has been identified for development of a new Garden Neighbourhood.
559	Land at The Manor House, Church Hill	Housing and open space	Saxmundham	SCC Highways	Potential impact upon Church Street signalised junction. Detailed analysis and potential mitigation required	Comment noted. The site is not a preferred site as sites elsewhere in the Parish are more suitable for allocation, considering the infrastructure issues.
568	Land adjacent and North of Keats Close, Saxmundham,	Housing	Saxmundham	Private individual	Open space next to popular dog walk between Saxmundham and Carlton. Currently no access and any	Comment noted. The site is not a potential site due to significant constraints regarding

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	IP17 2BH				new access would be dangerous.	access.
714	Land south of Saxmundham	Housing and open space	Saxmundham	Hopkins Homes	Development of the site would have a landscape impact and may not be able to deliver access improvements.	Comments received have been considered in identifying preferred sites. Strategic development at Saxmundham is a fundamental part of the Local Plan strategy and enables the delivery of infrastructure notably a primary school. The area would be developed based on the principles of a Garden Neighbourhood. Policy SCLP12.26 includes a requirement for biodiversity networks to be preserved and enhanced. A key consideration has been

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						ensuring that the gap between Saxmundham and Benhall is retained, and the southern boundary of the site will be defined after the consultation on the Frist Draft Local Plan. The selected site area also seeks to preserve The Layers area. Highways comments are being considered through the highways modelling with Suffolk County Council.
714	Land south of Saxmundham	Housing and open space	Saxmundham	Historic England	Development to the south of Saxmundham would alter the character of the town and the distinction between town and countryside, and impact on views out of the Conservation Area.	The area to the south of Saxmundham is identified as a location for strategic scale growth, and maintenance of the gap between Saxmundham and Benhall is a key part

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						of the policy approach. The area identified also considers minimising impacts on Hurts Hall to the east. The masterplanning process will provide an opportunity to consider the historic environment further.
714	Land South of Saxmundham	Housing and open space	Saxmundham	Pigeon Investment Management Ltd	Site promoted by landowner for residential use.	Comments received have been considered in identifying preferred sites. Strategic
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Development proposals in this location are ill considered and represent poor future development. Priority should be given to brown field sites, contaminated land, redundant areas and buildings. Concerned about	development at Saxmundham is a fundamental part of the Local Plan strategy and enables the delivery of infrastructure notably a primary school. The area would be developed based on the principles

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					environmental impact of the proposed development, increased light pollution, noise pollution and impact on wildlife.	of a Garden Neighbourhood. Policy SCLP12.26 includes a requirement for biodiversity networks to be preserved and enhanced. A key consideration has been ensuring that the gap between Saxmundham and Benhall is retained, and the southern boundary of the site will be defined after the consultation on the Frist Draft Local Plan. The selected site area also
714	Land South of Saxmundham	Housing and open space	Saxmundham	Suffolk Wildlife Trust	Represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	seeks to preserve The Layers area. Highways comments are being considered through the highways modelling with Suffolk County Council.
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Any	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development will be detrimental to the character of the village with very limited facilities.	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Behall & Sternfield Parish Council	Oppose. Any development of these sites would intrude into the open country side between Benhall and Saxmundham, and contribute to the loss of village identity.	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Some building here may be inevitable but please leave some countryside between Sax' and Benhall Green	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Inappropriate as unsuitable ribbon developments and link up Saxmundham with existing settlement of Benhall.	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Development would totally destroy the identity of Benhall. Implications for	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the infrastructure in the area would be catastrophic and the Layers would be gone forever. Benhall has already been imposed a disproportional large number of housing permissions and further sites should be rejected.	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Building between towns and villages should be avoided at all costs. A village loses it's character once part of something bigger	
714	Land South of Saxmundham	Housing and open space	Saxmundham	Private individual	Saxmundham has had a huge amount of new housing. Suggested development would lead to ribbon development connecting Saxmundham and Benhall Green.	
714	Land South of	Housing and open space	Saxmundham	SCC	All sites should co-operate	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Saxmundham			Highways	to ensure a masterplan for the area to the south of Saxmundham. Access for this site likely to be a separate junction on the A12, also serving the employment land west of the A12. No viable vehicular links to Saxmundham, although walking and cycling links will need to be provided. Any east bound traffic will impact on the capacity constrained Chantry Road (B1121 / B1119) signal crossroads in the centre of Saxmundham.	
717	Land South of Saxmundham	Housing	Saxmundham	Hopkins Homes	Development on the south of the site could potentially have significant adverse landscape impacts.	Comments received have been considered in identifying preferred sites. Strategic development at Saxmundham is a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						<p>fundamental part of the Local Plan strategy and enables the delivery of infrastructure notably a primary school. The area would be developed based on the principles of a Garden Neighbourhood. Policy SCLP12.26 includes a requirement for biodiversity networks to be preserved and enhanced. A key consideration has been ensuring that the gap between Saxmundham and Benhall is retained, and the southern boundary of the site will be defined after the consultation on the Frist Draft Local Plan. The</p>

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						selected site area also seeks to preserve The Layers area. Highways comments are being considered through the highways modelling with Suffolk County Council.
717	Land South of Saxmundham	Housing	Saxmundham	Historic England	Development to the south of Saxmundham would alter the character of the town and the distinction between town and countryside, and impact on views out of the Conservation Area.	The area to the south of Saxmundham is identified as a location for strategic scale growth, and maintenance of the gap between Saxmundham and Benhall is a key part of the policy approach. The area identified also considers minimising impacts on Hurts Hall to the east. The masterplanning process will provide an opportunity to consider

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						the historic environment further.
717	Land South of Saxmundham	Housing	Saxmundham	Pigeon Investment Management Ltd	Site promoted by landowner for residential use.	Comments received have been considered in identifying preferred sites. Strategic development at Saxmundham is a fundamental part of the Local Plan strategy and enables the delivery of infrastructure notably a primary school. The area would be developed based on the principles of a Garden Neighbourhood. Policy SCLP12.26 includes a requirement for biodiversity networks to be preserved and enhanced. A key consideration has been
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Development proposals in this location are ill considered and represent poor future development. Priority should be given to brown field sites, contaminated land, redundant areas and buildings. Concerned about environmental impact of the proposed development, increased light pollution, noise pollution and impact on wildlife.	
717	Land South of Saxmundham	Housing	Saxmundham	Suffolk Wildlife Trust	Represent a large block of land which is likely to contain species and/or	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	ensuring that the gap between Saxmundham and Benhall is retained, and the southern boundary of the site will be defined after the consultation on the Frist Draft Local Plan. The selected site area also
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Concerned that Benhall Green and Sternfield should remain distinct communities and not be swallowed up in a greater Saxmundham. Any development will be detrimental to the character of the village with very limited facilities.	seeks to preserve The Layers area. Highways comments are being considered through the highways modelling with Suffolk County Council.
717	Land South of Saxmundham	Housing	Saxmundham	Behall & Sternfield Parish Council	Oppose. Any development of these sites would intrude into the open country side between Benhall and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Saxmundham, and contribute to the loss of village identity.	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Some building here may be inevitable but please leave some countryside between Sax' and Benhall Green	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Inappropriate as unsuitable ribbon developments and link up Saxmundham with existing settlement of Benhall.	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Development would totally destroy the identity of Benhall. Implications for the infrastructure in the area would be catastrophic and the Layers would be gone forever. Benhall has already been imposed a disproportional large number of housing permissions and further	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					sites should be rejected.	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Building between towns and villages should be avoided at all costs. A village loses it's character once part of something bigger	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Saxmundham has had a huge amount of new housing. Suggested development would lead to ribbon development connecting Saxmundham and Benhall Green.	
717	Land South of Saxmundham	Housing	Saxmundham	Saxmundham Town Council	The layers land and south of Saxmundham – see comments on ribbon development.	
717	Land South of Saxmundham	Housing	Saxmundham	Private individual	Oppose development which would result in loss of Benhall's character as a village community. Building on both sides of the main	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					route between Benhall and Saxmundham would generate unacceptable amount of extra traffic.	
717	Land South of Saxmundham	Housing	Saxmundham	SCC Highways	Links to east and north of site required. Potential impact upon Church Street signalised junction. Detailed analysis and potential mitigation required	
830	Land at Saxmundham Station, Station Approach	Housing	Saxmundham	Saxmundham Town Council	These central sites adjacent to the Station should not be earmarked for housing, but for parking, employment or commercial uses (to be determined)	Comment noted. The site is not a preferred site as sites the site is below the 0.2ha site size threshold.
1012	Land West of Hurtshall Park	Housing	Saxmundham	Historic England	Development to the south of Saxmundham would alter the character of the town and the distinction between town and countryside, and impact on	The area to the south of Saxmundham is identified as a location for strategic scale growth, and maintenance of the gap between Saxmundham

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					views out of the Conservation Area.	and Benhall is a key part of the policy approach. The area identified also considers minimising impacts on Hurts Hall to the east. The masterplanning process will provide an opportunity to consider the historic environment further.
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Private individual	Development proposals in this location are ill considered and represent poor future development. Priority should be given to brown field sites, contaminated land, redundant areas and buildings. Concerned about environmental impact of the proposed development, increased light pollution, noise pollution and impact	Comments received have been considered in identifying preferred sites. Strategic development at Saxmundham is a fundamental part of the Local Plan strategy and enables the delivery of infrastructure notably a primary school. The area would be developed based on the principles

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					on wildlife.	of a Garden
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Suffolk Wildlife Trust	Represent a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Neighbourhood. Policy SCLP12.26 includes a requirement for biodiversity networks to be preserved and enhanced. A key consideration has been ensuring that the gap between Saxmundham and Benhall is retained, and the southern boundary of the site will
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Private individual	Some building here may be inevitable but please leave some countryside between Sax' and Benhall Green	be defined after the consultation on the Frist Draft Local Plan. The selected site area also
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Private individual	Inappropriate as unsuitable ribbon developments and link up Saxmundham with existing settlement of Benhall.	seeks to preserve The Layers area. Highways comments are being considered through the highways modelling with
1012	Land West of	Housing	Saxmundham	Private	Development would totally	Suffolk County Council.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hurts Hall Park, Saxmundham			individual	destroy the identity of Benhall. Implications for the infrastructure in the area would be catastrophic and the Layers would be gone forever. Benhall has already been imposed a disproportional large number of housing permissions and further sites should be rejected.	
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Private individual	Building between towns and villages should be avoided at all costs. A village loses it's character once part of something bigger	
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Private individual	Saxmundham has had a huge amount of new housing. Suggested development would lead to ribbon development connecting Saxmundham	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					and Benhall Green.	
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	Armstrong Rigg Limited	Site promoted by landowner for residential use.	
1012	Land West of Hurts Hall Park, Saxmundham	Housing	Saxmundham	SCC Highways	Linked to adjacent site 714, site requires master planning with adjacent sites. If brought forward in isolation with access from south Entrance it is likely to generate north bound traffic which would impact on Chantry Road signal cross roads with is a capacity constraint.	
1062	Land adjacent to Grafo Products LTD Works, St Johns Road	Housing	Saxmundham	Saxmundham Town Council	These central sites adjacent to the Station should not be earmarked for housing, but for parking, employment or commercial uses (to be determined)	Comment noted. The site is not a preferred site as sites elsewhere in the Town are more suitable for allocation. The Council supports the Neighbourhood Plan as the mechanism for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						delivering allocations for development centred on the needs of the community.
1080	land north of Tollgate Cottage, North Entrance, Saxmundham	Housing	Saxmundham	Saxmundham Town Council	We had earlier favoured this site for a much-needed enhanced community health service facility. We continue to oppose use of this site for housing purposes, and wish to consult our community on options for future community-related facilities or use	Site identified as unavailable in Draft SHELAA.
1080	land north of Tollgate Cottage, North Entrance, Saxmundham	Housing	Saxmundham	Private individual	Site 1080 was originally supposed to be for the provision of a new health centre for Saxmundham. It has already been turned down for housing and so should not be re-submitted. Saxmundham needs greater	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					health provision and a space in which to provide it.	
1080	land north of Tollgate Cottage, North Entrance, Saxmundham	Housing	Saxmundham	Private individual	Site 1080 - This site is not appropriate for residential development. The site lies outside the development boundary of Saxmundham. An application for outline permission for residential development was recently refused by the District council and an appeal to the SofS dismissed following a public inquiry. For all the reasons stated in the Inspectors decision letter, I consider this site is not suitable for development at the present time.	
20	Land adjacent to 1-6 The Street	Housing	Shottisham	Shottisham WI	Site is within the flood plain and been subject to fluvial flooding in the past.	The site is not required because a site allocated in the Site Allocations

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Development here would have a negative impact on the historic patchwork of water meadows in Shottisham.	and Area Specific Polciies document is carried forward into this Loal Plan strategy for Shottisham. Shottisham is identified as within the countryside and the Local Plan does not look to allocate sites in the countryside.
240	Land at Trust Hall, The Street	Housing	Shottisham	Shottisham WI	Site is owned by Shottisham WI and is not offered for development	The site is below the site size threshold of 0.2ha.
900	Land surrounding Trust Hall, The Street	Housing	Shottisham	Shottisham WI	Development on this site would be intrusive in the landscape and out of keeping with the adjacent conservation area.	The site is not made available for consideration in the Locla Plan.
901	Land East of Heath Drive	Housing	Shottisham	Bawdsey Estate	Site is suitable, available and achievable.	Site has been considered through the SHELAA and Sustainability Appraisal process. Site identified as potentially suitable

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						but not identified as a preferred site.
278	Land north of The Pump House, off A1120	Housing	Sibton	Private individual	Development would be on the edge of the village and very open to view. Site is next to Sewage Pumping Station.	Site identified as unavailable in Draft SHELAA.
314	Land east of the White Horse Inn, Halesworth Road	Housing	Sibton	Private individual	On the edge of the village and very open to view Agricultural land	Site identified as unavailable in Draft SHELAA.
545	Sizewell A Site, Nr Leiston	Office/Storage/Industry	Sizewell	Suffolk Wildlife Trust	Site is part of Sizewell nuclear power station which is bordered to the west by Sizewell Marshes SSSI. The area is known to be of high wildlife value and therefore further assessment is required to determine whether development in this	Comments noted. Site identified as potentially suitable however it was deemed that sites elsewhere in the District would be more suitable for allocation to meet evidenced need.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					location is likely to result in any adverse ecological impacts.	
545	Sizewell A Site, Nr Leiston	Office/Storage/Industry	Sizewell	SCC Highways	No comments. Traffic impact likely to be less than existing use.	
215	Land to the south of Priory Road	Housing	Snape	Suffolk Wildlife Trust	Site is adjacent to Snape Marshes CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement. Site is also not available for consideration in the Local Plan.
519	Land off Church Road, Church Common	Housing	Snape	Snape Parish Council	The site should remain as common land.	Site has been discounted as it is not within, adjoining or well related to the form of the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						settlement.
519	Land off Church Road, Church Common	Housing	Snape	Private Individual	Land promoted for development.	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
519	Land off Church road, Church common, Snape	Housing	Snape	PlanSurv Ltd	Object to the scoring in the Sustainability Appraisal on behalf of the landowner.	The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
1013	Brick Kiln Park, Church Road	Housing	Snape	Snape Parish Council	Development of the site would raise traffic impacts	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
288	Land north and west of Walk	Freight handling area	Stratton Hall	Private Individual	Object to development due to loss of open space and	Comments noted. Land further south of site (site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Farm				agricultural land, urban sprawl, impacts on tourism, traffic and pollution and infrastructure	706) identified instead for employment land related to sustaining the future of the Port of Felixstowe.
288	Land north and west of Walk Farm	Freight handling area	Stratton Hall	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	
288	Land north and west of Walk Farm	Freight handling area	Stratton Hall	Private Individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	
288	Freight handling area	Freight handling area	Stratton Hall	Private individual	Major site submission which would create catastrophic threat to maintaining the separation of Ipswich and Felixstowe. Amount of land is far in excess of predicted land requirements for employment.	Comments noted. Land further south of site (site 706) identified instead for employment land related to sustaining the future of the Port of Felixstowe.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
288	Freight handling area	Freight handling area	Stratton Hall	Private individual	Strongly opposed to any development of the land surrounding my property and the over development of land between the village and Felixstowe as feel the negative impact of such developments far outweigh any positive impact on the village or local communities	
288	Freight handling area	Freight handling area	Stratton Hall	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
288	Freight handling	Freight handling area	Stratton Hall	Private	Lodge objection to this site.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	area			individual	A14 corridor is predominately agricultural land and to allow industrial employment development would significantly impinge on the beauty of the area. Not realistic for large scale port related operations to be east of the Orwell Bridge and the road infrastructure in the District cannot realistically support further industrial development.	
288	Freight handling area	Freight handling area	Stratton Hall	SCC Highways	The A14 junction is left in left out and the same location as for site 706 below. The road to the north is a former A class road. Access to Ipswich difficult for workers using this site, involving driving to Trimley roundabout to U turn or driving through non-	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					strategic routes. Very remote from other facilities very limited sustainable transport options for workers. HGV assess would not be acceptable without significant improvement to the A14 junction.	
131	Land at Woodlands Farm, Hyde Park Corner	Housing	Sudbourne	Suffolk Wildlife Trust	Adjacent to Captain's and Sudbourne Great Woods CWS and Suffolk Wildlife Trust's Captain's Wood reserve. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	Sudbourne is not a settlement in the Local Plan strategy for housing growth.
131	Land at Woodlands Farm, Hyde Park Corner	Housing	Sudbourne	Sudbourne Parish Council	Not feasible or desirable.	Site has been discounted as it is not within, adjoining or well related to the form of the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						settlement.
152	Land to the East of Wood Farm	Housing	Sudbourne	Sudbourne Parish Council	Not feasible or desirable.	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
152	Land to the East of Wood Farm	Housing	Sudbourne	Sudbourne Parish Council	We have also considered the Sustainability Assessments for the five sites identified as potential sites for development in Sudbourne, and conclude that these assessments rule out any early prospect of development on these sites, most especially No 152.	Sudbourne is not a settlement in the Local Plan strategy for housing growth.
152	Land to the East of Wood Farm	Housing	Sudbourne	SCC Highways	Narrow rural roads without footways would require significant improvement	
202	Land at Corner Farm, Snape Road	Housing	Sudbourne	Sudbourne Parish Council	Not feasible or desirable.	Comments noted however site identified as not available in Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Strategic Housing and Economic Land Availability Assessment.
468	Land to the east of Snape Road	Housing	Sudbourne	Sudbourne Parish Council	Not feasible or desirable.	Comments noted. Whilst site is identified as potentially suitable, Sudbourne is identified as countryside in the settlement hierarchy and therefore not considered for allocations.
468	Land to the east of Snape Road, Sudbourne, IP12 2AZ	Housing	Sudbourne	Suffolk Wildlife Trust	Adjacent to Captain's and Sudbourne Great Woods CWS and Suffolk Wildlife Trust's Captain's Wood reserve. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	Sudbourne is not a settlement in the Local Plan strategy for housing growth.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
508	Land at Snape Road, Sudbourne	Housing	Sudbourne	Suffolk Wildlife Trust	Site is adjacent to and Suffolk Wildlife Trust's Captain's Wood reserve. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	Sudbourne is not a settlement in the Local Plan strategy for housing growth.
508	Land at Snape Road, Sudbourne	Housing	Sudbourne	Sudbourne Parish Council	Site currently subject of a proposed development of 17 houses.	
808	Land to the South of The Meadows	Housing	Sudbourne	Sudbourne Parish Council	Not feasible or desirable.	Comments noted. Whilst site is identified as potentially suitable, Sudbourne is identified as countryside in the settlement hierarchy and therefore not considered for allocations.
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Inadequate drainage for major part of the village,	Comments noted. Site not preferred for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development of site will create undue burden on minor access road, broadband is totally inadequate and need for private motor car will cause air and noise pollution.	allocation. Sutton is a small village and limited allocations are made.
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Concerned about access, mostly single track and poor visibility. Very poor sewer treatment provision in the village.	
244	Land north Old Post Office Lane	Housing	Sutton	Sutton Parish Council	Backland development not in keeping with the historic pattern of the village, access is only via a single track road not suitable for traffic.	
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	No facilities in the village, access is a single track road, need private motor car to live in the village. Village does not need additional	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					houses.	
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Access is mainly one lane road and development on this site would generate extra traffic. Sutton does not have any public transport, mobile and broadband connections are very poor.	
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Access to the Old Post Office lane site is totally inadequate, and not easily changed in an acceptable manner. It is also a major incursion into the rural area outside the village envelope - and in the AONB	
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Post Office Lane is a narrow country road. Not enough demand to warrant these houses and site is completely unsuitable. Little employment in the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					village and everybody would have to drive to access employment and services.	
244	Land north Old Post Office Lane	Housing	Sutton	Private individual	Old Post Office Lane is only a small single lane therefore it would not be able to cope with any amount of extra traffic that the development would bring. I feel that this development would not be right for the village at this current time	
387	land south of Sutton Walks, Main Road	Housing	Sutton	Private individual	Inadequate drainage for major part of the village, development of site will create undue burden on minor access road, broadband is totally inadequate and need for private motor car will cause air and noise pollution.	The comments have been considered in identifying preferred sites. The site considered suitable for allocation as Sutton is identified as a small village and has some potential for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
387	land south of Sutton Walks, Main Road	Housing	Sutton	Sutton Parish Council	This site has also been turned down previously. If allowed it would be built on current agricultural land. Access would be difficult for the volume of traffic movements and Highways would have difficulty in agreeing to it.	development. A smaller part of the site than that submitted is proposed for development. The policy requires the development of the site to reflect the site's location in the AONB. The proposed site
387	land south of Sutton Walks, Main Road	Housing	Sutton	Private individual	The Main Road site would appear to be for very large expensive housing which would completely change the nature of the village. It also intrudes into the rural area outside the village envelope - and in the AONB.	allocation requires the design and layout to reflect the linear nature of the village, and affordable housing would need to be provided. The SFRA does not identify issues related to flooding on the site albeit that there are other parts of Sutton which are identified as being at risk of surface water flooding. Suffolk

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						County Council have not identified any issues related to access.
320	Land north west of Eastbridge Farm	Housing	Theberton	Suffolk Wildlife Trust	Site adjacent to Minsmere-Walberswick Heaths & Marshes SSSI. Further assessment is required to determine whether development in these locations is likely to result in an adverse impact on this site.	Comments noted. Site not proposed for allocation for development in the First Draft Local Plan as below site size threshold.
320	Land north west of Eastbridge Farm	Housing	Theberton	J T Hancock and Associates	Although a more realistic site for infill type set between established development, three dwellings would need to small and sensitive matching the characteristics of other small developments in the settlement.	
322	Land south west	Housing	Theberton	Suffolk	Site adjacent to Minsmere-	Comments noted. Site

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	of Red House Farm, Cemetery Road			Wildlife Trust	Walberswick Heaths & Marshes SSSI. Further assessment is required to determine whether development in these locations is likely to result in an adverse impact on this site.	not proposed for allocation for development in the First Draft Local Plan due to Theberton & Eastbridge being identified as countryside in the settlement hierarchy.
322	Land south west of Red House Farm, Cemetery Road	Housing	Theberton	J T Hancock and Associates	Site forms a sensitive area providing part of the essential character of this area. 5 dwellings would represent significant additional scale of development which would disturb character of settlement by increased activity, also detrimental to the AONB.	
957	Land to the north of Beacon Hill Lane	Housing	Thorpeness	Aldringham cum Thorpe Parish Council	Site previously discounted due to being remote from services, poorly related to physical limits, intrudes into	Comments noted however site identified as not available in Draft Strategic Housing and

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					AONB, in Heritage Coast, impacts on allotments and SSSI.	Economic Land Availability Assessment.
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Site previously rejected on appeal, access would be difficult and overdevelopment would have a negative impact on allotment gardens nearby. Additional volume of traffic would be detrimental to ambience of the village and endanger children, cyclists and pedestrians.	Comments noted. The site is not made available for consideration for allocation in the First Draft Local Plan. A neighbourhood plan is being prepared for the village that could allocate sites.
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Site totally unacceptable, its abuts the AONB and supports bio-diverse habitats. Development would dramatically alter unique setting of the area and reduce the natural beauty forever and loss of amenity for nearby	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					residents.	
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Site is an old dump and most unsuitable for development.	
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Development of this site is not in the best interests of the local community, tourism and recreational activities, local employment and long term self-sustenance. Development of this site would change the heritage or the village.	
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Development in this area would irretrievably prejudice the character of the old village, destroy the ecology of the location and lead to more second homes or holiday homes.	
957	Land to the north of Beacon	Housing	Thorpeness	Private individual	Site should be discounted because of natural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hill Lane, Thorpeness				landscape, high level of environmental amenity and heritage value of Thorpeness. Site is within the Heritage Coast and AONB and provides valuable habitat. Difficult to see how the site can be developed given the availability of better local sites.	
957	Land to the north of Beacon Hill Lane, Thorpeness	Housing	Thorpeness	Private individual	Development would damage irrevocably change the unique area of Thorpeness. Style of any development would look incongruous adjacent to the existing properties. Thorpeness does seem to be a particularly inappropriate area to develop as though it were the same as any other	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					community village and not, as it is, a holiday village.	
959	Land to the west of Pilgrims Way	Housing	Thorpeness	Aldringham cum Thorpe Parish Council	Site previously discounted due to being remote from services, outside physical limits, intrudes into AONB, in Heritage Coast, impacts on SSSI and impacts on Conservation Area and Listed Building.	Site identified as potentially suitable and the issues identified have been picked up through the SHELAA, however the Local Plan provides an opportunity for the Neighbourhood Plan to consider site allocations.
959	Land to the west of Pilgrims Way	Housing	Thorpeness	Private Individual	Land promoted for development.	Comments noted. Thorpeness is not identified for housing growth in the First Draft Local Plan strategy. A neighbourhood plan is being prepared for the village that could allocate sites.
959	Land to the west of Pilgrims Way,	Housing	Thorpeness	Private individual	We believe that the site is already studied and	Comments noted. Thorpeness is not

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Thorpeness				considered to be favourable.	identified for housing growth in the First Draft Local Plan strategy. A neighbourhood plan is being prepared for the village that could allocate sites.
959	Land to the west of Pilgrims Way, Thorpeness	Housing	Thorpeness	Private individual	Better location adjacent to existing main road and bus route.	
959	Land to the west of Pilgrims Way, Thorpeness	Housing	Thorpeness	Private individual	Proposed development of affordable housing is laudable but unaffordable to most wage earners in the Parish. There should be an inclusion for safe path/cycles to connect Thorpeness and Aldringham.	
959	Land to the west of Pilgrims Way, Thorpeness	Housing	Thorpeness	Private individual	Supportive of plans providing the necessary infrastructure is put in place and the site does not become second homes.	
959	Land to the west of Pilgrims Way, Thorpeness	Housing	Thorpeness	Private individual	No objection in principle to the application providing it is enabling development.	
959	Land to the west	Housing	Thorpeness	Private	Site offers major siting	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	of Pilgrims Way, Thorpeness			individual	advantages for phased development of affordable, sheltered and open market dwellings together with new leisure facilities.	
959	Land to the west of Pilgrims Way, Thorpeness	Housing	Thorpeness	Private individual	Site would be suitable for social housing but of a restricted nature due to the lack of public transport. Should be single storey accommodation for the elderly.	
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	Private individual	We believe that the site is already studied and considered to be favourable.	Comments noted. Thorpeness is not identified for housing growth in the First Draft Local Plan strategy. A neighbourhood plan is being prepared for the village that could allocate sites.
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	Private individual	Better location adjacent to existing main road and bus route.	
981	Land off	Housing	Thorpeness	RSPB	Development in this area	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Aldringham Road, Aldringham cum Thorpe				could result in increased recreational disturbance to the nearby Sandlings SPA.	
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	Suffolk Wildlife Trust	Site is adjacent to the Sandlings SPA and Leiston-Aldeburgh SSSI. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	Thorpeness and Aldeburgh Hotels Limited	Suggest changes to the Sustainability Appraisal. Site promoted for mixed use, residential, leisure, sports and tourism uses in order to boost the attractiveness of the tourist offer in Thorpeness.	
981	Land off Aldringham	Housing	Thorpeness	Private individual	Would do little to adjust the social mix in Thorpeness	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Aldringham cum Thorpe				and would certainly be very desirable to weekenders, buy to let owners. There was talk of revitalising Thorpeness with a more permanent community. We do not think this particular development would further this	
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	Private individual	Access would need to be agreed and would result in the loss of the practice range. More discussion needed with the Parish Council.	
981	Land off Aldringham Road, Aldringham cum Thorpe	Housing	Thorpeness	SCC Highways	No Footways and speed limit terminal adjacent to site. Unclear whether it is feasible to link to village centre.	
30	Land North East of High Road	Housing and open space	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or	Comments noted. The site is not proposed for allocation reflecting the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	approach to housing growth in Trimley St Martin to be limited having regard to the focus for growth nearby in North Felixstowe.
30	Land North East of High Road	Housing and open space	Trimley St Martin	Levington & Stratton Hall Parish Council	Parish Council oppose use of land to the west of Trimley St Martin and Kirton as they together with potential use of land for commercial use, contribute to the urbanisation of the green space between Ipswich and Felixstowe.	
30	Land North East of High Road	Housing and open space	Trimley St Martin	SCC Highways	Speed limit amendment and footway extension/ crossing point required	
356	Land surrounding	Mixed Use	Trimley St Martin	Kirton and Falkenham	Sustainability Appraisal should not identify positive	Site identified as unavailable in Draft

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Ham's Farmhouse, east of Kirton Road			Parish Council	effects for flooding and archaeology.	Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal not undertaken.
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed Use	Trimley St Martin	Trimley St Martin Parish Council	Landowner did not intend it to be considered on this occasion.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	The site is not made available for consideration in the Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	Site 356 again is good agricultural land 92ha is for mixed use – whatever that means as no one from planning could give a satisfactory answer when asked at a recent meeting.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	We feel that none of the proposals put forward with relation to the PLDs we have referred to are suitable. The construction of a housing development in a village with no local services is pointless. The destruction of large amounts of strategically important agricultural land, in order to create commercial facilities that would be economically disadvantaged due to their location, is frankly absurd.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	For an area this size to be considered is just totally unacceptable - especially under a 'banner' of Mixed use. This area encompasses a bigger land mass than Kirton & Falkenham put together. The area certainly does not need a 'Ransomes' type development	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	At this moment in time I understand that the landowner did not intend it to be considered.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Kirton and Falkenham Parish Council	STRONGLY NEGATIVE. SCDC point out that part of the site is prone to flooding. It is believed that it also has surface streams. Contains habitats for protected species. This site abuts Kirton, Falkenham and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Trimley St. Martin. It will therefore link these villages and lose their distinctiveness; the three villages have very different character.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	I believe the land owner is not aware of the request so I am guessing someone has done this to muddy the waters in the area and scare the Villagers in thinking that this could be another major development but the same applies to this site as 706 it is agricultural land we need to eat.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	Site is outside of the village boundaries and would effectively join Kirton to Trimley St Martin. We must maintain separation of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					villages.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	Strong objection on the grounds of poor access, traffic congestion, noise, light pollution, loss of farmland, loss of habitat and inadequate highways and drainage.	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	For an area this size to be considered is just totally unacceptable - especially under a 'banner' of Mixed use. This area encompasses a bigger land mass than Kirton & Falkenham put together. The area certainly does not need a 'Ransomes' type development	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	Private individual	Prime agricultural land should NEVER be used for industrial use & ONLY IN THE LAST RESORT for housing. As a nation we	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					have to retain the option to be able to produce as much food as possible in times of crisis. In an uncertain world that is important to National Security. Rich and powerful landowners should not bulldoze the Council into making decisions that will adversely affect this community & possibly in the future, the nation. The road infrastructure is already at breaking point which is another reason why I am also objecting to the developments proposed	
356	Land surrounding Ham's Farmhouse, east of Kirton Road	Mixed use	Trimley St Martin	SCC Highways	Access from Kirton Road may be possible at the south eastern end closer to the A14 roundabout but only limited access would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					be viable in Kirton village. Back Lane and Brook lane are not suitable for significant increases in traffic	
364	Land south 146 Kirton Road	Housing	Trimley St Martin	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal not undertaken.
364	Land south 146 Kirton Road	Housing	Trimley St Martin	Trimley St Martin Parish Council	Site put forward by Parish Council previously, however no longer wish it to be considered.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Private individual	I understand that it is no longer intended to be subject of consideration.	The site is not made available for consideration in the Draft Local Plan.
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Kirton and Falkenham	NEUTRAL IF DESIGNATED FOR PARKING. Adjacent to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Parish Council	the school with major traffic and parking problems. If the site is developed it should be as a school parking and/or drop of facility. Does contain some protected species.	
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Private individual	Could perceive maybe possible but at school times this road is nearly impassable due to the car parking along the road. May work if some of the land can be allocated for school car parking.	
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Private individual	Objection on grounds of access, site not well integrated with village and loss of wildlife habitat	
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Private individual	Road infrastructure in the area is already at breaking point.	
364	Land south 146	Housing (assumed)	Trimley St	Private	Could there be a trade off?	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Kirton Road		Martin	individual	A few houses for a school car park to ease congestion at school drop off and pick up times?	
364	Land south 146 Kirton Road	Housing (assumed)	Trimley St Martin	Private individual	The School Parent Teachers Association have requested land for car parking, this has been refused.	
372	Land to the north of Heathfields	Housing	Trimley St Martin	Scott Properties	Land promoted for development.	Comments noted. The site is not allocated reflecting the approach to housing growth in Trimley St Martin to be limited having regard to the focus for growth nearby in North Felixstowe.
372	Land to the north of Heathfields	Housing	Trimley St Martin	Scott Properties	Site promoted for residential use targeted at older people.	Comments noted. The site is not proposed for allocation reflecting the approach to housing growth in Trimley St Martin to be limited
372	Land to the north of Heathfields	Housing	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or	Comments noted. The site is not proposed for allocation reflecting the approach to housing growth in Trimley St Martin to be limited

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	having regard to the focus for growth nearby in North Felixstowe.
372	Land to the north of Heathfields	Housing	Trimley St Martin	Levington & Stratton Hall Parish Council	Parish Council oppose use of land to the west of Trimley St Martin and Kirton as they together with potential use of land for commercial use, contribute to the urbanisation of the green space between Ipswich and Felixstowe.	
372	Land to the north of Heathfields	Housing	Trimley St Martin	SCC Highways	Assessment of whether residential approach roads could accommodate additional traffic flows required	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Kirton and Falkenham Parish Council	Sustainability Appraisal should not identify positive effects for transport.	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment and therefore Sustainability Appraisal not undertaken.
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Trimley St Martin Parish Council	Incorrectly located on the map	Site identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment.
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Development in this location would urbanise the whole of Kirton Road. Number of cars an issue at school drop off and pick up times.	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Could perceive maybe possible but at school times this road is nearly impassable due to the car	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					parking along the road. May work if some of the land can be allocated for school car parking.	to the form of the settlement.
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Objection on grounds of access, site not well integrated with village and loss of wildlife habitat	
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Could there be a trade off? A few houses for a school car park to ease congestion at school drop off and pick up times?	
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Location incorrect	
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	The School Parent Teachers Association have requested land for car parking, this has been refused.	
497	Blue Barn Farm, Trimley St Martin	Housing	Trimley St Martin	Private individual	Road infrastructure is already at breaking point which would require access	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					points near dangerous bends on Kirton Road.	
511	Land adjacent to Reeve Lodge,	Mixed use	Trimley St Martin	Private individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	Site forms part of a preferred allocation to provide residential units, primary school, self build plots and open space. Development of the site does not extend Trimley beyond its current northern extent.
511	Land adjacent to Reeve Lodge,	Mixed use	Trimley St Martin	Trimley St Martin Parish Council	Not suitable as Trimley St Martin cannot accommodate more housing above that already allocated.	Site is proposed for allocation to support delivery of a new primary school.
511	Land adjacent to Reeve Lodge, High Road	Mixed use	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest.	The site is proposed for allocation under policy SCLP12.62. The policy includes a requirement for an ecological

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	assessment.
511	Land adjacent to Reeve Lodge, High Road	Mixed use	Trimley St Martin	Pigeon Investment Management Limited	Site promoted for high quality residential, including self build accommodation, affordable homes, primary school, public amenity space, landscaping and associated development.	The site is proposed for allocation under policy SCLP12.62, including the uses outlined.
518	The Old Poultry Farm, High Road	Mixed use	Trimley St Martin	Private individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	Site identified as potentially suitable, however alternative site identified as proposed allocation.
518	The Old Poultry Farm, High Road	Mixed use	Trimley St Martin	Trimley St Martin Parish Council	Not suitable as Trimley St Martin cannot accommodate more housing above that already	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					allocated.	
651	Land At High Road, Trimley St Martin	Self built pilot scheme	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted. The site is not proposed for allocation reflecting the approach to housing growth in Trimley St Martin to be limited having regard to the focus for growth nearby in North Felixstowe.
651	Land At High Road, Trimley St Martin	Self built pilot scheme	Trimley St Martin	Pigeon Investment Management Limited	Site promoted to deliver new homes with the delivery of self-build plots, affordable homes, amenity space, landscaping and associated infrastructure.	
651	Land At High Road, Trimley St Martin	Self built pilot scheme	Trimley St Martin	Suffolk Wildlife Trust	NEGATIVE. SCDC point out it will increase emissions, is on greenfield land and would be ribbon	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development. Protected species.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Trinity College, Cambridge	Land promoted for development	Site identified as a preferred site for employment allocation in the First Draft Local Plan.
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	Comments noted and reflected in the policy requirements for the site. However, the site is identified from Local Plan economic evidence as being required for the long term land requirements to sustain the future of the Port of Felixstowe.
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private Individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	The site is identified from Local Plan economic evidence as being required for the long term land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						requirements to sustain the future of the Port of Felixstowe. The policy requires significant landscaping on the site to help to mitigate landscape impacts.
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Kirton and Falkenham Parish Council	Sustainability Appraisal should identify negative effects in relation to housing, health, quality of life, education, biodiversity and geodiversity, archaeology, prosperity and growth and transport. Query need for new warehousing.	Sustainability Appraisal identifies potential negative impacts in relation to air, material assets and cultural heritage. Impacts on air and material assets would be likely for any site proposed for this scale of use. The policy
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Trimley St Marin Parish Council	No evidence to show site this size is needed, storage and distribution will not generate many jobs, located adjacent to housing, issues of air, noise	seeks to address landscape impacts by requiring significant landscaping of the site. The Port of Felixstowe identifies the need for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					and light pollution, junction would increase trip length, A14 / Croft Ln junction unsuited to large scale use, site is good agricultural land.	provision for land for Port related uses. The policy requires access for traffic in easterly and westerly directions.
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted and reflected in the policy requirements for the site. However, the site is identified from Local Plan economic evidence as being required for the long term land requirements to sustain the future of the Port of Felixstowe.
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Kirton & Falkenham Parish Council	EXTREMELY NEGATIVE. Very serious risk of pollution to adjacent homes and school. Would need significant highway	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					improvements, loss of agricultural land and site is far greater in size than that required in the evidence base and forecasting model.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Alarmed at the proposed development of this site, adds up to destruction of Kirton as a village. Plenty of brownfield sites at the docks, air pollution, light pollution, building on prime agricultural land, overbearing for the size of Kirton.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Strongly object to this site.	
706	Innocence Farm, Nr Kirton,	Storage or distribution	Trimley St Martin	Private individual	Strongly object, ill-considered and shameful to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Felixstowe, Trimley St Martin				encourage urbanisation within this beautiful countryside landscape.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Very strong objection on grounds of poor access, noise, smell, light pollution, loss of farmland, loss of habitat	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	I would like to take the opportunity to totally condemn the Port of Felixstowe's push to develop these areas for Port use. The port has failed to plan and develop (if required) areas that they currently have access to. The idea of constructing a massive site including warehousing and rail sidings is abhorrent. One needs to look, long term at this supposed 'requirement'	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					of the Port, because there is certainly not a need at present.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Would be irresponsible and controversial for the Council to allow such development. As a nation we have to retain the option to be able to produce as much food as possible in times of crisis. In an uncertain world that is important to National Security. Rich and powerful landowners should not bulldoze the Council into making decisions that will adversely affect this community & possibly in the future, the nation.	
706	Innocence Farm, Nr Kirton, Felixstowe,	Storage or distribution	Trimley St Martin	Private individual	Site 706 for storage or distribution is particularly unsuitable for any	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Trimley St Martin				development as it is not needed. Port expansion has slowed and indeed shrunk in terms of trade. London Gateway is coming on stream, able to take the largest ships currently in operation, Southampton is growing to take trade from Felixstowe and Liverpool is poised to ship direct to America and receive likewise.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Some of the proposers I truly believe do not have the villages wellbeing, health and community in mind they are just interest in the money they will gain by the sale of the land.	
706	Innocence Farm, Nr Kirton, Felixstowe,	Storage or distribution	Trimley St Martin	Private individual	Alarmed by the potential linking of Ipswich and Felixstowe into one urban	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Trimley St Martin				sprawl. Would create catastrophic threat to maintaining the separation of the two towns and a major impact on the natural environment and the AONB.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Innocence Lane storage/distribution – this demands a large amount of land but little generation of employment. Therefore on the 115.6 hectares being suggested as Port related areas this would give max. pollution per hectare sacrificed and lowest employment plus loss of valuable farmland	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St	Storage or distribution	Trimley St Martin	Private individual	Very large site outside village boundaries. Would severely damage the local environment in terms of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Martin				noise, smell, emissions and light pollution. Would require massively expensive access developments with road building. Some flooding on the site currently. Industrial use would adversely affect the Special Landscape Area.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	I am also extremely concerned about the proposed plans for site 706 and strongly object. This will have an enormous effect on Kirton Village, that will completely change the area. It is crucial to understand the environmental impact and damage that this development will have on the local rural area. Light pollution, diesel fumes,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					noise and loss of habit to the wildlife are just a few areas that will affect standard of living in the surrounding villages	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	They are extremely ill-considered. It would be shameful to encourage urbanisation within this beautiful countryside landscape, with an unsuitable development that will cause huge visual impact and well as vast amounts of pollution to the countryside.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	I also strongly object to the proposed plans for the development of this land for container use from Felixstowe Dock. The effect this would have on the surrounding villages would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					be great.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Cross Boundary Parish Council Group (Bucklesham, Kirton & Falkenham, Levington & Stratton Hall, Trimley St Martin, Trimley St Mary).	No evidence has been presented to show that a site of this size is required for port related uses, sites for which permissions already exist are not yet used within the vicinity of the port, land demand are large but do not generate large number of jobs. Impact on local area will be felt for many years to come with villages adversely affected. Site is close to primary school and playing field. Development reduces the gap between Ipswich and Felixstowe. Access and traffic would have a serious impact. Environmental impact not been considered.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Will lead to continuous development between these two separate towns, with the result that one amorphous built-up area will be created. This is totally out of keeping with the Suffolk Coastal area, which is known for its predominantly rural landscape containing separate and distinct towns and villages. The destruction of large amounts of strategically important agricultural land, in order to create commercial facilities that would be economically disadvantaged due to their location, is frankly absurd.	
706	Innocence Farm, Nr Kirton,	Storage or distribution	Trimley St Martin	Private individual	To concrete over top-grade agricultural land for	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Felixstowe, Trimley St Martin				industrial and housing development is foolishly short-sighted, also leading to rainwater run-off flooding fields and further reducing crop yields. To do so on this site would be criminal. Pollution in the form of diesel particles, noise and light would seriously endanger the physical and mental health of the local population	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	With Ipswich expanding along side of the A14, with these proposed developments it would mean a continuous stretch of industrial waste land from the Orwell bridge to the sea. Site should also be rejected due to impact on wildlife, light pollution,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					position of the lorry park to the school and the pollution it will cause, and the traffic chaos that already exists would be worse. Is the school in a village or the centre of a major city with the children being subject to these dangers it will create	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Levington & Stratton Hall Parish Council	Any developments on these areas would bring enormous increases in traffic, much of it HGVs, and place an unsustainable pressure on the local road infrastructure and the Orwell bridge. Would also be a substantial increase in noise, light and air pollution which would have a detrimental impact on local residents and natural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					environment. Any port related use of land must be firstly considered on a clear Statement of Need and not on some speculative venture by landowners or agents, vigorously scrutinised by SCDC using independent and expert consultants, and the use of brownfield land at the Port must also be taken into consideration.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	The site 706, innocence farm, and its proposed industrial makeover would devastate Trimley St martin and Kirton. Light and noise pollution 24 hours a day. lack of infrastructure and loss of a huge piece of prime agricultural land when surely with Brexit we	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					need to be saving this. There are brownfield sites within the docs with planning for this kind of development that are unused due to lack of demand. SCDC should hang their heads in shame if they allow this to proceed as they would be doing so in the full knowledge of the impact it would have on the peninsula and those that call it home.	
706	Innocence Farm, Nr Kirton, Felixstowe, Trimley St Martin	Storage or distribution	Trimley St Martin	Private individual	Very nature of the development would change from rural to industrial with a huge impact on Kirton and Trimley St Martin residents and their quality of life.	
706	Innocence Farm, Nr Kirton,	Storage or distribution	Trimley St Martin	SCC Highways	Innocence Lane and Kirton Road are not suitable for	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Felixstowe, Trimley St Martin				increased HGV traffic without substantial improvement. The A14 junction is left in left out, ideally this type of use would have access via an all movements junction. The junction (HE network) would require extensive modification to make it suitable for intensification of use, especially for HGV traffic. Other sites to the south of the A14 may be able to facilitate a larger junction scheme.	
756	Land South West of High Road	Housing and open space	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to	Comments noted. The site is not proposed for allocation reflecting the approach to housing growth in Trimley St Martin to be limited having regard to the

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					determine whether development in this location is likely to result in any adverse ecological impacts.	focus for growth nearby in North Felixstowe.
756	Land South West of High Road	Housing and open space	Trimley St Martin	Levington & Stratton Hall Parish Council	Parish Council oppose use of land to the west of Trimley St Martin and Kirton as they together with potential use of land for commercial use, contribute to the urbanisation of the green space between Ipswich and Felixstowe.	
756	Land South West of High Road	Housing and open space	Trimley St Martin	SCC Highways	Footway along frontage with ped crossing and links to village centre	
757	Land South of High Road	Housing and open space	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	having regard to the focus for growth nearby in North Felixstowe.
757	Land South of High Road	Housing and open space	Trimley St Martin	SCC Highways	Access from Grimston Lane unlikely as improvements appears unfeasible. Direct link to High Road may be required.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private Individual	Object to development due to loss of open space and agricultural land, urban sprawl, impacts on tourism, traffic and pollution and infrastructure.	Comments noted. Site not allocated for employment and land on the opposite side of the A14 is earmarked for Port related employment land in this Draft Plan.
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	
852	Land opposite	Employment	Trimley St	Trimley St	Could support small	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Morston Hall, Morston Hall Lane		Martin	Martin Parish Council	development but buildings would need to be sensitive to rural landscape.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted. Site not proposed for allocation for employment and land on the opposite side of the A14 is proposed for allocation for Port related employment land in this Draft Plan.
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	The major site submissions creating this catastrophic threat to maintaining the separation of the two towns and a major impact on the natural environment and AONBs	
852	Land opposite	Employment	Trimley St	Private	Essential that if approved	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Morston Hall, Morston Hall Lane		Martin	individual	high quality high density employment with buildings that are discreet and in keeping with the adjacent area are the terms.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	The development of this site would lead to continuous development between these two separate towns, with the result that one amorphous built-up area will be created. This is totally out of keeping with the Suffolk Coastal area, which is known for its predominantly rural landscape containing separate and distinct towns and villages. Quite simply the road network in and around the Ipswich area is unsuitable for the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					commercial activities envisioned. The destruction of large amounts of strategically important agricultural land, in order to create commercial facilities that would be economically disadvantaged due to their location, is frankly absurd.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	I would like to take the opportunity to totally condemn the Port of Felixstowe's push to develop these areas for Port use. The port has failed to plan and develop (if required) areas that they currently have access to. The idea of constructing a massive site including warehousing and rail sidings is abhorrent. One	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					needs to look, long term at this supposed 'requirement' of the Port, because there is certainly not a need at present.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	Development of port related activities on this site would have a significant negative impact on the local residents through noise and light pollution, particularly taking into account the 24 hour operations.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	Site should be rejected because of impact on wildlife, light pollution, position of the lorry park to the school and the pollution it will cause, and the traffic chaos that already exists would be worse. Is the school in a village or the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					centre of a major city with the children being subject to these dangers it will create.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Levington & Stratton Hall Parish Council	Any developments on these areas would bring enormous increases in traffic, much of it HGVs, and place an unsustainable pressure on the local road infrastructure and the Orwell bridge. Would also be a substantial increase in noise, light and air pollution which would have a detrimental impact on local residents and natural environment. Any port related use of land must be firstly considered on a clear Statement of Need and not on some speculative venture by landowners or	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					agents, vigorously scrutinised by SCDC using independent and expert consultants, and the use of brownfield land at the Port must also be taken into consideration.	
852	Land opposite Morston Hall, Morston Hall Lane	Employment	Trimley St Martin	Private individual	I think that it has been overlooked that it is also in the National Interest for the U.K. to be able to feed its population as much as possible. This area is the bread basket of the Country. These are politically uncertain times with BREXIT & tensions in the World as a whole. Once good fertile land is built on it is gone forever.	
852	Land opposite Morston Hall, Morston Hall	Employment	Trimley St Martin	SCC Highways	Consult Highways England - Would potentially increase use of substandard access	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane				onto A14.	
853	Land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Private Individual	Development would result in loss of farmland and creation of an industrial belt between Ipswich and Felixstowe	Comment noted. Site not allocated for employment and land on the opposite side of the A14 is earmarked for
853	Land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Trimley St Martin Parish Council	Could support small development but buildings would need to be sensitive to rural landscape.	Port related employment land in this Draft Plan.
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comment noted. Site not proposed for allocation for employment and land on the opposite side of the A14 is proposed for allocation for Port related employment land in this Draft Plan.
853	land at Morston	Employment	Trimley St	Private	Major site submission	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hall Road and adjacent to the A14		Martin	individual	create a catastrophic threat the separation of the two towns and major impact on the natural environment and the AONB.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Private individual	Essential that if approved high quality high density employment with buildings that are discreet and in keeping with the adjacent area are the terms.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Private individual	The development of this site would lead to continuous development between these two separate towns, with the result that one amorphous built-up area will be created. This is totally out of keeping with the Suffolk Coastal area, which is known for its predominantly rural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					landscape containing separate and distinct towns and villages. Quite simply the road network in and around the Ipswich area is unsuitable for the commercial activities envisioned. The destruction of large amounts of strategically important agricultural land, in order to create commercial facilities that would be economically disadvantaged due to their location, is frankly absurd.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Private individual	I would like to take the opportunity to totally condemn the Port of Felixstowe's push to develop these areas for Port use. The port has failed to plan and develop (if	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					required) areas that they currently have access to. The idea of constructing a massive site including warehousing and rail sidings is abhorrent. One needs to look, long term at this supposed 'requirement' of the Port, because there is certainly not a need at present.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Private individual	Development of port related activities on this site would have a significant negative impact on the local residents through noise and light pollution, particularly taking into account the 24 hour operations.	
853	land at Morston Hall Road and adjacent to the	Employment	Trimley St Martin	Private individual	Site should be rejected because of impact on wildlife, light pollution,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	A14				position of the lorry park to the school and the pollution it will cause, and the traffic chaos that already exists would be worse. Is the school in a village or the centre of a major city with the children being subject to these dangers it will create.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Levington & Stratton Hall Parish Council	Any developments on these areas would bring enormous increases in traffic, much of it HGVs, and place an unsustainable pressure on the local road infrastructure and the Orwell bridge. Would also be a substantial increase in noise, light and air pollution which would have a detrimental impact on local residents and natural	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					environment. Any port related use of land must be firstly considered on a clear Statement of Need and not on some speculative venture by landowners or agents, vigorously scrutinised by SCDC using independent and expert consultants, and the use of brownfield land at the Port must also be taken into consideration.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	Suffolk Wildlife Trust	I think that it has been overlooked that it is also in the National Interest for the U.K. to be able to feed its population as much as possible. This area is the bread basket of the Country. These are politically uncertain times with BREXIT & tensions in	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the World as a whole. Once good fertile land is built on it is gone forever.	
853	land at Morston Hall Road and adjacent to the A14	Employment	Trimley St Martin	SCC Highways	Consult Highways England - Would potentially increase use of substandard access onto A14.	
978	Land rear of Mill Lane	Housing	Trimley St Martin	Trimley St Martin Parish Council	Subject to planning application	Site has not been assessed as planning permission has been granted,
978	Land rear of Mill Lane, Trimley St Martin	Housing	Trimley St Martin	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Planning permission granted for housing development of the site.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
978	Land rear of Mill Lane, Trimley St Martin	Housing	Trimley St Martin	Private individual	Already subject to planning application	
978	Land rear of Mill Lane, Trimley St Martin	Housing	Trimley St Martin	Levington & Stratton Hall Parish Council	Parish Council would oppose this site, as together with the potential use of land for commercial uses it would contribute to the urbanisation of the green space between Ipswich and Felixstowe.	
978	Land rear of Mill Lane, Trimley St Martin	Housing	Trimley St Martin	Pigeon Investment Management Limited	Site benefits from a resolution to grant full planning permission for 69 units. The legal agreement is at an advanced stage and has now been agreed by the relevant parties.	
978	Land rear of Mill Lane, Trimley St Martin	Housing	Trimley St Martin	SCC Highways	Access via High Road. Footway improvements.	
30	Land north east of High Road	Housing and open space	Trimley St Mary	Trinity College,	Land promoted for development	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Cambridge		the Draft Strategic Housing and Economic Land Availability Assessment however site 511 provides an opportunity for a site for a new school for form a more central and focal part of the village.
114	Land at 182 High Road	Not specified	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
141	Land at Station Nursery, Cordys Lane	Employment	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
211	Land off Gaymers Lane and adjacent to 179 High Road	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Availability Assessment
211	Land off Gaymers Lane and adjacent to 179 High Road	Housing	Trimley St Mary	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted. The site is not made available for consideration in the Draft Local Plan.
446	Searsons Farm, Cordy's Lane	Housing and Open Space	Trimley St Mary	Trinity College, Cambridge	Land promoted for development	Site has been discounted as it is not within, adjoining or well related to the form of the settlement.
446	Searsons Farm, Cordy's Lane	Housing and Open Space	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	
655	Land adj to 31-37 Bucklesham Road	Not specified	Trimley St Mary	Private individual	Site was previously marked as protected from development.	Comment noted. Site not proposed for allocation reflecting settlement coalescence.
655	Land adj to 31-	Not specified	Trimley St	SCC	Thurmans Lane would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	37 Bucklesham Road		Mary	Highways	require significant improvement if used to access site	
665	Land adjacent to 33 Thurmans Lane, Trimley St Mary	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is entirely within a designated Area to be Protected from Development.
667	Land to the north of Thurmans Lane and to the east of the A14	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment. Additionally, Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is not

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						within, adjoining, adjacent or well related to the form of the settlement.
667	Land to the north of Thurmans Lane and to the east of the A14	Housing	Trimley St Mary	SCC Highways	Unclear how site would be accessed. Capel Hall Lane not suitable at existing width.	The site is not made available for consideration in the Draft Local Plan.
707	Christmasyards Wood	Storage or distribution	Trimley St Mary	Private individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	Comments noted. An alternative site at Innocence Farm adjacent the A14 is allocated for Port related employment land.
707	Christmasyards Wood	Storage or distribution	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	
707	Christmasyards Wood, off Fagbury Road West, Felixstowe, IP11 4BB	Storage or distribution	Trimley St Mary	Private individual	We believe that development for port related activity would have a significant negative impact on the local residents through noise and	Comments noted. An alternative site at Innocence Farm adjacent the A14 is proposed for allocation for Port related

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					light pollution, particularly taking into account the 24 hour operation of such facilities.	employment land.
707	Christmasyards Wood, off Fagbury Road West, Felixstowe, IP11 4BB	Storage or distribution	Trimley St Mary	Suffolk Wildlife Trust	Large blocks of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
707	Christmasyards Wood, off Fagbury Road West, Felixstowe, IP11 4BB	Storage or distribution	Trimley St Mary	SCC Highways	Adjacent to existing port area. Assumed that access would be via existing port infrastructure.	
758	Land West of High road	Housing and open space	Trimley St Mary	Trimley St Mary Parish	No further sites in the Parish as few green spaces	Site identified as potentially suitable in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Council	remain	Draft Strategic Housing and Economic Land Availability Assessment – However, it was deemed Site 511 (site allocation: SCLP12.63 is a more suitable site.
758	Land West of High Road	Housing and open space	Trimley St Mary	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	Comments noted. The site is not proposed for allocation reflecting the approach to housing growth in Trimley St Mary to be limited having regard to the focus for growth nearby in North Felixstowe.
758	Land West of High Road	Housing and open space	Trimley St Mary	SCC Highways	Access from Gaymers Lane unlikely as improvements appears unfeasible. Direct link to High Road may be required.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
759	Land West of Port Felixstowe Road	Housing and open space	Trimley St Mary	Trinity College, Cambridge	Land promoted for development	Site it within an Area to be Protected from Development and therefore is not suitable for allocation.
759	Land West of Port Felixstowe Road	Housing and open space	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unsuitable in Draft Strategic Housing and Economic Land Availability Assessment – site is entirely within a designated Area to be Protected from Development.
759	Land West of Port Felixstowe Road	Housing and open space	Trimley St Mary	SCC Highways	New access road onto High Road required. Close to bridge.	Site identified as unsuitable as it is within a designated Area to be Protected from Development..
790	Land adjacent to 33-37 Thurmans Lane	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Economic Land Availability Assessment
790	Land adjacent to 33-37 Thurmans Lane	Housing	Trimley St Mary	Private individual	Site was previously marked as protected from development.	The site is not made available for consideration in the Draft Local Plan.
790	Land adjacent to 33-37 Thurmans Lane	Housing	Trimley St Mary	SCC Highways	Thurmans Lane would require significant improvement if used to access site	
950	Land at Faulkners Way	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
950	Land at Faulkners Way	Housing	Trimley St Mary	Private individual	Site was previously marked as protected from development.	The site is not made available for consideration in the Draft Local Plan.
985	Land at and surrounding Pooleys removals and	Housing	Trimley St Mary	Private individual	Site was previously marked as protected from development.	The site is not made available for consideration in the Draft Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	storage, Bentwaters Park					
985	Land at Thurmans Lane, Trimley St Mary	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site identified as unavailable in the Draft Strategic Housing and Economic Land Availability Assessment
992	Land rear 194 High Road, off Thurmans Lane, Trimley St Mary	Housing	Trimley St Mary	Trimley St Mary Parish Council	No further sites in the Parish as few green spaces remain	Site is below 0.2ha and is therefore below the site size threshold for consideration for allocation.
135	Off Keightley Way	Housing	Tuddenham St Martin	Tuddenham St Martin Parish Council	No objection but indicative number of homes appears high. There are already parking problems.	Site identified as a preferred site. The density proposed is approximately 20 dwellings per hectare which is considered to be appropriate for a

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						village. Landscaping will be required, and car parking will be expected to be provided in accordance with policy SCLP7.2.
216	Land adjacent to Hilltop, Westerfield Lane	Housing	Tuddenham St Martin	Tuddenham St Martin Parish Council	No objection but indicative number of homes appears high. There are already parking problems.	Site identified as a preferred site. The density proposed is approximately 20 dwellings per hectare which is considered to be appropriate for a village. Landscaping will be required, and car parking will be expected to be provided in accordance with policy SCLP7.2.
54	Land opposite Tunstall Hall, Snape Road	Housing	Tunstall	Private individual	This is currently apparent waste ground and I would have thought a reasonable site for development. It	Comments noted. Tunstall is a Small village in the Local Plan strategy. In the context

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					would be accessed from a road capable of taking the traffic even though quite a busy road at times during the day.	of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
54	Land opposite Tunstall Hall, Snape Road	Housing	Tunstall	Private individual	Site 54 is believed to be a suitable site for a housing development within Tunstall in line with the 13 recommended homes. Development of Site 54 is believed to cause minimal environmental impact and provide sustainable economic benefits to the village.	
54	Land opposite Tunstall Hall, Snape Road	Housing	Tunstall	Private individual	Only access to these three sites is from Snape Road which is a narrow two lane twisty road with very poor visibility and no footpath. However if highway works were carried out to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					straighten Snape Road giving proper visibility and safer access together with a pavement then development could be a possibility. This is largely fallow unused land within the village envelope.	
54	Land opposite Tunstall Hall, Snape Road	Housing	Tunstall	Tunstall Parish Council	Unsuitable. This is already a well-used piece of road with many bends and sight lines would be restricted posing hazards to any entrance to a development	
54	Land opposite Tunstall Hall, Snape Road	Housing	Tunstall	Private individual	Site 54 – this is already a well used piece of road with many bends and sight lines would be restricted posing hazards to any entrance to a development.	
54	Land opposite Tunstall Hall,	Housing	Tunstall	Private individual	Outside the physical limits boundary and a change of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Snape Road				use from agriculture to housing would be detrimental to the rural character of Tunstall.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Gedgrave Estate	Site 108 neighbours 4 Grade II Listed properties, three to the west and one to the east and also lies within Suffolk Coast and Heaths AONB. We would also question whether this site could be safely accessed from the busy main road through the village	Comments noted. Tunstall is a Small village in the Local Plan strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	A development could contain provision for parking for the cottages opposite who currently use the edge of the road. It could make the corner safer especially if priority was given to Snape traffic rather	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					than Orford traffic.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Tunstall Parish Council	Unsuitable. Site is within the AONB and outside of physical limits boundary. Although the site is within the centre of the village access would be opposite or on top of a 4 way junction in the centre of the village.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	Subject to the provision of a pavement this is entirely suitable for a reasonably safe modest development. If a layby were to be a planning requirement then the development could include a small shop.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	The primary reason being that the area is designated as of Outstanding Natural Beauty and does not have the infrastructure to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					support any more development.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	Believe this area to have previously been designated as an Area of Outstanding Natural Beauty and are unaware that this status has changed in recent years.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	Would create congestion on an already dangerous junction. Vision at this junction is poor and cannot be improved due to the proximity of existing houses	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	It is within an AONB and every effort must be made to protect this unique landscape. This site is also central to the visual amenity and rural character of the village.	
108	Land adjacent to	Residential or retail	Tunstall	Private	I object to their inclusion.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	The Red House, Orford Road			individual	Also Tunstall already has a major housing development underway without any planned improvement to the local infrastructure. I cannot support further development in my village under these circumstances.	
108	Land adjacent to The Red House, Orford Road	Residential or retail	Tunstall	Private individual	This village does not have sufficient infrastructure to support more dwellings	
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	This site appears to be accessed from an unmade up track and currently is the home for several allotments. This site seems to be quite unsuitable for development.	Comments noted. Tunstall is a Small village in the Local Plan strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	There are a number of properties on this land and no requirement to demolish can be justified.	
194	land at Three	Not specified	Tunstall	Tunstall	Site is within historic	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Corners, Woodbridge Road			Parish Council	settlement core, also within the AONB and outside of the physical limits boundary. Already houses and allotments on the site	
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	Firmly believe the site should not be considered for development in Tunstall. Within the AONB and must be properly valued for the long term.	
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	I object to their inclusion. Also Tunstall already has a major housing development underway without any planned improvement to the local infrastructure. I cannot support further development in my village under these circumstances.	
194	land at Three Corners, Woodbridge	Not specified	Tunstall	Private individual	Developing these sites would be counter to various policies of the Local Plan	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road				which seek conservation of the ANOB. I strongly object to their inclusion.	
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	I am truly horrified about this proposal within the AONB. AONB's must be protected at all cost for the benefit of future generations , This particular AONB contains one of the finest landscapes in Britain	
194	land at Three Corners, Woodbridge Road	Not specified	Tunstall	Private individual	Site194 is also within the AONB and outside the physical limits boundary and, as above, development would impact substantially.	
214	Land at site of former allotments, off Tunstall Green	Not specified	Tunstall	Private individual	This is currently apparent waste ground and I would have thought a reasonable site for development. It would be accessed from a road capable of taking the	Site is unavailable and therefore not being considered as part of this Local Plan

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					traffic even though quite a busy road at times during the day.	
214	Land at site of former allotments, off Tunstall Green	Housing	Tunstall	Private individual	Have rights over some of the plot, also believe that neighbours have similar rights. It would be my suggestion that if the developers want to make use of the land it would be best to turn it back into allotments or some development which compliments the land rights, as selling it for houses is likely to cause multiple legal issues.	
214	Land at site of former allotments, off Tunstall Green	Housing	Tunstall	Private individual	If highway works were carried out to straighten Snape Road giving proper visibility and safer access together with a pavement then development could be	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					a possibility.	
214	Land at site of former allotments, off Tunstall Green	Housing	Tunstall	Tunstall Parish Council	There is no access through to this land. Any access would have a detrimental effect on the residents of Tunstall Green.	
214	Land at site of former allotments, off Tunstall Green	Housing	Tunstall	Private individual	Vision at this junction is poor and cannot be improved due to the proximity of existing houses. The scrapes on the walls and destruction to downpipes are testament to the difficulties that this junction currently experiences. Current lines of vision as you come from Snape down the Orford Road are appalling with no scope for these to be improved due to existing buildings.	
415	Land opposite	Housing	Tunstall	Gedgrave	Site 415 neighbours 4	Comments noted.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Hall Garden Cottage, Tunstall			Estate	Grade II Listed properties, three to the west and one to the east and also lies within Suffolk Coast and Heaths AONB. We would also question whether this site could be safely accessed from the busy main road through the village	Tunstall is a Small village in the Locla Plan strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
415	Land opposite Hall Garden Cottage, Tunstall	Housing	Tunstall	Private individual	This is currently apparent waste ground and I would have thought a reasonable site for development. It would be accessed from a road capable of taking the traffic even though quite a busy road at times during the day.	
415	Land opposite Hall Garden Cottage, Tunstall	Housing	Tunstall	Private individual	If highway works were carried out to straighten Snape Road giving proper visibility and safer access	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					together with a pavement then development could be a possibility. This is largely fallow unused land within the village envelope.	
415	Land opposite Hall Garden Cottage, Tunstall	Housing	Tunstall	Tunstall Parish Council	Unsuitable, this is already a well-used piece of road with many bends and sight lines would be restricted. Access to this site would be very dangerous and there are no services in the area.	
415	Land opposite Hall Garden Cottage, Tunstall	Housing	Tunstall	Private individual	Vision at this junction is poor and cannot be improved due to the proximity of existing houses. The scrapes on the walls and destruction to downpipes are testament to the difficulties that this junction currently experiences. Current lines of vision as you come from	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Snape down the Orford Road are appalling with no scope for these to be improved due to existing buildings.	
415	Land opposite Hall Garden Cottage, Tunstall	Housing	Tunstall	Private individual	Outside of the physical limits boundary and a change of use from agriculture to housing would be detrimental to the rural character of Tunstall.	
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Gedgrave Estate	More physically separated from the village than our client's site and therefore less suitable than our client's site for development.	Comments noted. Tunstall is a Small village in the Local Plan strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Private individual	This road is also unsuitable for pedestrian access. There are no footpaths on either single track road which means pedestrians have no	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					choice but to mix with oncoming vehicles. This includes children making their way to Tunstall Green, where their school bus stop is located. Site 464 will have a harmful overlooking or overbearing impact on neighbouring dwellings. I am one of those neighbouring dwellings and the majority of the land can be viewed from my garden and even my house which is set back an estimated 5m from the fence attached to the land.	villages.
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Private individual	This site does not have good access from School Road which has houses on both sides at this point. If Blaxhall Church Road is widened at the junction,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					access to this site could be possible. Probably would need a large amount of new services and infrastructure.	
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Tunstall Parish Council	Unsuitable – single track road, used heavily by farm traffic.	
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Private individual	This has part commercial use and has been deemed suitable by the 2014 SHLAA for housing. As the land borders both School Road and Blaxhall Church Road there could be access to the site on a “one way “ basis from School Road with the exit route via Blaxhall Church Road which could be widened down to the junction thus giving safe entry and exit from the site.	
464	Plunketts Barns, Blaxhall Church	Housing	Tunstall	Private individual	Site is on single track roads that already struggle to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Tunstall				cope with the volume of traffic. Both roads are used by school children who have to walk to catch the bus in the centre of the village. Increased traffic would cause further hazard to their journey as well as to locals who regularly need to walk on them and to those of us when we venture out onto the roads from our driveways.	
464	Plunketts Barns, Blaxhall Church Road, Tunstall	Housing	Tunstall	Private individual	Outside of the physical limits boundary and a change of use from agriculture to housing would be detrimental to the rural character of Tunstall.	
543	Land North of School Road	Housing	Tunstall	Gedgrave Estate	More physically separated from the village than our client's site and therefore	Comments noted. Tunstall is a Small village in the Local Plan

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					less suitable than our client's site for development.	strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
543	Land North of School Road	Housing	Tunstall	Private individual	It is likely that the planning consideration on this site will be determined before the next version of the local plan is produced. If this is not the case, then I believe the factors which I mention below also resonate with this site.	
543	Land North of School Road	Housing	Tunstall	Private individual	The nature and use conditions of the stretch of School Road onto this site would make the access absolutely inappropriate for further residential development. Site is outside of the Tunstall village envelope. It is claimed that development on this site would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					contribute towards the Alde and Ore Association Estuary Appeal which I do not support.	
543	Land North of School Road	Housing	Tunstall	Private individual	This proposed site is unacceptable. At this point the road is 11 feet wide (3.5 metres). Current houses are very near to the road, and access to this area as a development site is not possible. The road is a main artery for agricultural vehicles often as wide as the road itself. Most traffic travels too fast and this can be a dangerous road	
543	Land North of School Road	Housing	Tunstall	Private individual	Site is on a very narrow dangerous one car width "rat run" road which already has too much traffic, including articulated lorries and massive farm	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					vehicles, and the danger inherent in gaining access to this road by the existing householders is such that it is wholly inappropriate for any more properties to be built requiring such access	
543	Land North of School Road	Housing	Tunstall	Tunstall Parish Council	Unsuitable, the site has the same road issues as facing other sites and is also liable to regular flooding.	
543	Land North of School Road	Housing	Tunstall	Private individual	Site is on a single track roads that already struggle to cope with the volume of traffic. Both roads are used by school children who have to walk to catch the bus in the centre of the village. Increased traffic would cause further hazard to their journey as well as to locals who regularly need to walk on them and to	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					those of us when we venture out onto the roads from our driveways.	
543	Land North of School Road	Housing	Tunstall	Private individual	Outside of the physical limits boundary and a change of use from agriculture to housing would be detrimental to the rural character of Tunstall.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Gedgrave Estate	Site promoted by the landowner for residential use.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Private individual	This road is also unsuitable for pedestrian access. There are no footpaths on either single track road which means pedestrians have no choice but to mix with oncoming vehicles. This includes children making their way to Tunstall Green, where their school bus stop	Site not taken forward, significant issues in respect of access.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					is located.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Private individual	Unless Blaxhall Church Road is widened at the junction, access to this site from Blaxhall Church Lane does not seem sensible. Presumably services would be available from the new development on Ashe Road.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Private individual	Site is of good agricultural land outside the village envelope and should not be considered. There are exceptional surface water drainage problems with this site.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Tunstall Parish Council	Unsuitable, development on this site would result in Tunstall creeping towards Blaxhall. Access onto the road will be very dangerous.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
546	Land West of Blaxhall Church Road	Housing	Tunstall	Private individual	Site is on single track roads that already struggle to cope with the volume of traffic. Both roads are used by school children who have to walk to catch the bus in the centre of the village. Increased traffic would cause further hazard to their journey as well as to locals who regularly need to walk on them and to those of us when we venture out onto the roads from our driveways.	
546	Land West of Blaxhall Church Road	Housing	Tunstall	Private individual	Outside of the physical limits boundary and a change of use from agriculture to housing would be detrimental to the rural character of Tunstall.	
727	South of Snape	Tourism	Tunstall	Tunstall	We believe that the plot	Comment reflected. The

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Maltings			Parish Council	should not have been coloured yellow for housing. Should the plot be used for overflow parking for Snape Maltings we would have no argument.	site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land
727	South of Snape Maltings	Tourism	Tunstall	SCC Highways	Footway from site to existing footway on B1069 required plus traffic free route to Maltings. Sufficient off road vehicle parking	Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
727	South of Snape Maltings	Tourism	Tunstall	Snape Maltings	Site promoted for car parking to support the activities at Snape Maltings.	
728	Land to the East of Snape Maltings	Tourism	Tunstall	Tunstall Parish Council	We believe that the plot should not have been coloured yellow for housing. Low lying and liable to flooding, very close to the river and may destroy the special landscape.	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
728	Land to the East of Snape Maltings	Tourism	Tunstall	Snape Maltings	Site promoted for parking for special event overspill parking, such as the Aldeburgh Food and Drink Festival.	as it is not within, adjoining or well related to the form of the settlement.
760	Land South of B1078	Housing	Tunstall	Private individual	This seems a reasonable site as it is on a road capable of taking the traffic and with services.	Comments noted. Tunstall is a Small village in the Locla Plan strategy. In the context of existing planning permissions for new housing, highways, services and the benefits of village growth, sites are proposed for allocation in other villages.
760	Land South of B1078	Housing	Tunstall	Private individual	Site is good agricultural land outside the village envelope and should not be considered.	
760	Land South of B1078	Housing	Tunstall	Tunstall Parish Council	Site is outside the physical limits boundary and a change of use from agriculture to housing would be detrimental to the rural character of Tunstall. Tunstall is already experiencing a substantial housing development with	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					no positive change to the local infrastructure. It would be totally inappropriate to allocate additional land for housing without an improvement to local facilities and public transport. The car remains the main method of travel to schools, shops and medical services.	
44	Adjacent to Bridge Cottage, Yarmouth Road	Housing	Ufford	Ufford Parish Council	This site refers to the parcel of land next to Hillside Cottage which is currently under construction (DC/16/0836/FUL) Suitable (under construction)	Site is below the site size threshold and therefore not being taken forward in the Local Plan.
143	Land at Spring Lane and Yarmouth Road	Housing	Ufford	Ufford Parish Council	Unsuitable - Southern parts of the site lie in areas of SWF. To the very south is an area of FZ3 and 2. Local Landscapes – Site is in SLA. The south	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					east corner of the site is within 'Ufford Parklands' (Green infrastructure)	Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
143	Land at Spring Lane and Yarmouth Road	Housing	Ufford	Private individual	Particularly unsuitable, notably the sites on flood zones and encroaching on woodland	
143	Land at Spring Lane and Yarmouth Road	Housing	Ufford	SCC Highways	Footway widening required	
177	Land adjacent Brook House, Bealings Road	Employment	Ufford	Ufford Parish Council	Unsuitable. Parish Council strongly object to the relocation of Woodbridge Town Football Club, because of increase traffic, potential noise and light pollution	Comments noted. Site not proposed for allocation reflecting highways and coalescence issues, and evidence employment needs are better provided for thorough other sites proposed for allocation.
177	Land adjacent Brook House, Bealings Road	Employment	Ufford	Suffolk Wildlife Trust	Further assessment is required to determine whether development in this location is likely to result in additional adverse impacts on the CWS. Also,	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					in-combination with site 556, development at this site would result in the CWS being almost completely surrounded by development which would significantly reduce connectivity to the wide countryside.	
177	Land adjacent Brook House, Bealings Road	Employment	Ufford	Notcutts Limited	Site promoted by the landowner for a more positive land use.	
420	land east of Crownfields	Housing	Ufford	Ufford Parish Council	Unsuitable. This field is part of the village landscape and fabric. It is an area of outstanding natural beauty when viewed from many different locations and as such is completely integral to the character and nature of the village. Any development on this land would completely destroy	Comments and landscape evidence reflected in the site not being proposed for allocation for housing development.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					the special landscape and character of the village.	
420	land east of Crownfields	Housing	Ufford	Private individual	Reject any future development on the margins of our unique water meadows. Would lead to loss of irreplaceable habitats. Development on this site would be against the NPPF and the Core Strategy policies as well as the Ufford Conservation Area Appraisal.	
420	land east of Crownfields	Housing	Ufford	Private individual	The number and scale of many of these developments are wholly out of proportion to Ufford and would severely damage the nature of the community, not to mention demand infrastructure and services which are simply not in place.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
420	land east of Crownfields	Housing	Ufford	Private individual	This field is part of the village landscape and fabric. It is an area of outstanding natural beauty when viewed from many different locations and as such is completely integral to the character and nature of the village. Any development on this land would completely destroy the special landscape and character of the village. The land is used by many residents for dog walking, recreational activities	
420	land east of Crownfields	Housing	Ufford	Private individual	Strongly register objection to development on this site.	
420	land east of Crownfields	Housing	Ufford	Private individual	Any development of these sites will cause flooding to Midsummer Cottage in heavy rainfall — from which, of course, we would	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					need proper flood protection installed by the council if development is permitted on these sites	
424	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Ufford Parish Council	Unsuitable. Development here would impinge on views described in the Ufford Conservation Area Review. It is the LA's duty to preserve the Conservation Area	Comments and landscape evidence reflected in the site not being proposed for allocation for housing development.
424	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Reject any future development on the margins of our unique water meadows. Would lead to loss of irreplaceable habitats. Development on this site would be against the NPPF and the Core Strategy policies as well as the Ufford Conservation Area Appraisal.	
424	Land off Barrack	Housing	Ufford	Private	The number and scale of	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane, Ufford, IP13 6DU			individual	many of these developments are wholly out of proportion to Ufford and would severely damage the nature of the community, not to mention demand infrastructure and services which are simply not in place.	
424	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	They are a haven for local wildlife (see above) and as such are completely unsuitable for development.	
424	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Strongly register objection to development on this site.	
424	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Any development of these sites will cause flooding to Midsummer Cottage in heavy rainfall — from which, of course, we would need proper flood	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					protection installed by the council if development is permitted on these sites	
425	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Ufford Parish Council	Unsuitable. Development here would impinge on views described in the Ufford Conservation Area Review. It is the LA's duty to preserve the Conservation Area	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land
425	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Reject any future development on the margins of our unique water meadows. Would lead to loss of irreplaceable habitats. Development on this site would be against the NPPF and the Core Strategy policies as well as the Ufford Conservation Area Appraisal.	Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
425	Land off Barrack Lane, Ufford,	Housing	Ufford	Private individual	The number and scale of many of these	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	IP13 6DU				developments are wholly out of proportion to Ufford and would severely damage the nature of the community, not to mention demand infrastructure and services which are simply not in place.	
425	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	They are a haven for local wildlife (see above) and as such are completely unsuitable for development.	
425	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Strongly register objection to development on this site.	
425	Land off Barrack Lane, Ufford, IP13 6DU	Housing	Ufford	Private individual	Any development of these sites will cause flooding to Midsummer Cottage in heavy rainfall — from which, of course, we would need proper flood protection installed by the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					council if development is permitted on these sites	
426	Land at East Lane, Ufford	Housing	Ufford	Ufford Parish Council	Unsuitable. East Lane, a no through road, runs along the base of a large escarpment to its north. Water percolates down the hill to emerge as a line of springs on the south side of the lane. The result is instability of the subsoil under the lane, which was built for horses and carts.	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
426	Land at East Lane, Ufford	Housing	Ufford	Private individual	Reject any future development on the margins of our unique water meadows. Would lead to loss of irreplaceable habitats. Development on this site would be against the NPPF and the Core Strategy policies as well as the Ufford Conservation	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Area Appraisal.	
426	Land at East Lane, Ufford	Housing	Ufford	Private individual	The number and scale of many of these developments are wholly out of proportion to Ufford and would severely damage the nature of the community, not to mention demand infrastructure and services which are simply not in place.	
426	Land at East Lane, Ufford	Housing	Ufford	Private individual	Strongly register objection to development on this site.	
472	Land Adjacent to Keeper's Cottage High Street	Housing	Ufford	Ufford Parish Council	This site is poorly related to the village and outside the physical limits boundary	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						to the form of the settlement.
472	Land Adjacent to Keeper's Cottage High Street	Housing	Ufford	Private individual	Particularly unsuitable, notably the sites on flood zones and encroaching on woodland	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
488	Land South of 'Cambrai', Yarmouth Road	Housing	Ufford	Ufford Parish Council	This site is poorly related to the village and outside the physical limits boundary	Comment reflected. The site has been identified as not suitable for housing development through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						to the form of the settlement.
512	Land at Lodge Road, Ufford	Housing	Ufford	Ufford Parish Council	Loss of agricultural land, area of historic and architectural importance, appeal decisions concluded “a harmful effect on the character and appearance of the area”.	Comments reflected in the site not being proposed for allocation for housing development. Ufford is a Small village in the Locla Plan strategy. In the context of recent housing growth and existing planning permissions for new housing, highways, services and the benefits of village growth site are allocated in other villages.
556	Grove Farm	Housing/Business and office	Ufford	Ufford Parish Council	This site is poorly related to the village and outside the physical limits boundary	The site has been identified as not suitable for housing development through
556	Grove Farm	Housing/Business and office	Ufford	Suffolk	Further assessment is	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Wildlife Trust	required to determine whether development in this location is likely to result in additional adverse impacts on the CWS. Also, in-combination with site 177, development at this site would result in the CWS being almost completely surrounded by development which would significantly reduce connectivity to the wide countryside.	the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
556	Grove Farm	Housing/Business and office	Ufford	Private individual	Strongly register objection to development on this site.	
556	Grove Farm	Housing/Business and office	Ufford	Clarke & Simpson	Site promoted by landowner for residential use.	
561	Crown Nursery, High Street	Housing/Open Space/Office/Care Home	Ufford	Ufford Parish Council	This site is poorly related to the village and outside the physical limits boundary	Comments noted. Site not proposed for allocation reflecting highways, lack of clarity
561	Crown Nursery,	Housing/Open Space/Office/Care	Ufford	Private	Strongly register objection	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	High Street	Home		individual	to development on this site.	about the nature and emphasis of employment use and lack of integration with the village. Evidenced employment needs are better provided for through other sites proposed for allocation.
561	Crown Nursery, High Street	Housing/Open Space/Office/Care Home	Ufford	Artisan PPS Ltd	Site promoted for employment and residential use by the landowner.	
561	Crown Nursery, High Street	Housing/Open Space/Office/Care Home	Ufford	Private individual	Development of Crown Nurseries has demonstrated that Ufford is completely unsuitable to further development. Caused significant chaos even before completion and destroyed a once spectacular landscape.	
811	Land adj to houses at Lodge Road, High Street	Housing	Ufford	Ufford Parish Council	Loss of agricultural land, flooding, adjacent to the Special Landscape Area and refer to a appeal decision which refused application on this site.	
811	Land adj to houses at Lodge Road, High Street	Housing	Ufford	Private individual	Strongly register objection to development on this site.	Site is not available and therefore not taken forward in this Local Plan

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
908	Land in between A12 and Yarmouth Road	Mixed use	Ufford	Ufford Parish Council	This site is unrelated to the village and it is a greenfield site	Site is not within, adjoining or well related to the form of the settlement.
908	Land in between A12 and Yarmouth Road	Mixed use	Ufford	Private individual	Strongly register objection to development on this site.	
908	Land in between A12 and Yarmouth Road	Mixed use	Ufford	Notcutts Ltd	Site promoted by the landowner to accommodate the relocation of Woodbridge Town Football Club	
908	Land in between A12 and Yarmouth Road	Mixed use	Ufford	SCC Highways	New access onto northbound A12 may be required. Significant cost and third party land to provide.	
909	Land in between A12 and Yarmouth Road	Mixed use	Ufford	Ufford Parish Council	This site is unrelated to the village and it is a greenfield site	Site is not taken forward due to significant constraints regarding access.
909	Land in between A12 and Yarmouth Road	Mixed use	Ufford	Private individual	Strongly register objection to development on this site.	
909	Land in between	Mixed use	Ufford	Notcutts Ltd	Site promoted by the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	A12 and Yarmouth Road				landowner to accommodate the relocation of Woodbridge Town Football Club	
1054	Land adj. Copse Corner, Byng Hall Road, Ufford	Housing	Ufford	Ufford Parish Council	This site is unrelated to the village and it is a greenfield site	Comments noted. The lack of integration with the village is reflected in the site not being proposed for allocation for housing development..
1054	Land adj. Copse Corner, Byng Hall Road, Ufford	Housing	Ufford	Private individual	Strongly register objection to development on this site.	
1054	Land adj. Copse Corner, Byng Hall Road, Ufford	Housing	Ufford	Private individual	The proposed 1054 plot is immediately adjacent to the A12 so I would suggest that this is not the most suitable site for a future development. If not already done so I would urge you to visit Byng Hall Road for a site visit to view for yourself the entrance and the impact that any	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					development would have.	
1054	Land adj. Copse Corner, Byng Hall Road, Ufford	Housing	Ufford	SCC Highways	Significant improvements to Byng Hall Road required to link site to local amenities	
82	Land adj Rose Cottage, Fishpond Road	Housing	Waldringfield	Waldringfield Parish Council	Impact on the AONB, poorly related to the existing settlement and highway capacity. Site is also outside of the physical limits boundary and the Parish Council note that this land has not been put forward by the current owner.	Comments noted. The site is not preferred for allocation. This reflects its location between environmental designations around the Deben Estuary and planned strategic development at Adastral Park. Site is not within, adjoining or well related to the form of the settlement.
395	land at Gorse Farm, Newbourne Road	Housing	Waldringfield	Waldringfield Parish Council	Not suitable, poorly related to the existing settlement. Open fields provide separation between Adastral Park and the AONB	Comments noted. The site is not preferred for allocation. This reflects its location between environmental

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					and helps to reduce visual impact.	designations around the Deben Estuary and planned strategic development at Adastral Park. Site is not within, adjoining or well related to the form of the settlement.
395	land at Gorse Farm, Newbourne Road	Housing	Waldringfield	Private individual	Buffer zone between Adastral Park and Waldringfield, borders the AONB. Road between Brightwell and Waldringfield is already busy at peak times. Parking at Waldringfield is at bursting point and the inclusion of this plot of land threatens to destroy the community of Waldringfield.	
395	land at Gorse Farm, Newbourne Road	Housing	Waldringfield	Private individual	Outside of the village envelope and poor transport links, narrow roads with no pavements which are becoming dangerous for walkers and cyclists. Inadequate buffer between the AONB and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Adastral Park. I should point out that site 395 identified on map comprises three separate plots. As owner of the plot in the centre, I have no intentions for any development.	
395	land at Gorse Farm, Newbourne Road	Housing	Waldringfield	SCC Highways	No links to village amenities, cost of provision may be unfeasible.	
509	Waldringfield Golf Club, Newbourne Road, IP12 4PT	Leisure/housing/tourism	Waldringfield	Waldringfield Parish Council	Is not suitable as it is outside the East of Ipswich development area, is within the AONB and is outside the physical limits boundary of Waldringfield.	Comments noted. The site is not preferred for allocation. This reflects its location between environmental designations around the
509	Waldringfield Golf Club, Newbourne Road, IP12 4PT	Leisure/housing/tourism	Waldringfield	Private individual	Object to the inclusion of this site. Potentially this would become another fill in area between Gorse Farm and Waldringfield.	Deben Estuary and planned strategic development at Adastral Park. Site is not within, adjoining or well related

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					Development would result in loss of habitat for birds and other wildlife. Area borders the AONB.	to the form of the settlement.
509	Waldringfield Golf Club, Newbourne Road, IP12 4PT	Leisure/housing/tourism	Waldringfield	Private individual	An established leisure facility within the AONB, should not be developed further. Any extra development which increases the traffic flow on the adjacent rural road network should be resisted.	
509	Waldringfield Golf Club, Newbourne Road, IP12 4PT	Leisure/housing/tourism	Waldringfield	SCC Highways	No links to village amenities, cost of provision may be unfeasible	
419	land south of Halesworth Road	Housing	Walpole	Private individual	Concerned about the loss of delightful rural views if this site is developed.	Comment noted. Walpole is identified as countryside and Local Plan avoids allocating in these locations.
711	Land adj. to Blacksmiths	Housing	Walpole	Private individual	Concerned about the loss of delightful rural views if this	Comment noted. Walpole is identified as

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Cottage, Halesworth Road, Walpole				site is developed.	countryside and Local Plan avoids allocating in these locations.
58	Land adjacent to Brackenway, Blackheath Road, Wenhaston	Housing	Wenhaston	Private individual	Site was subject to a planning application which was refused on substantial grounds.	Site below the site size threshold and not taken forward in this Local Plan.
58	Land adjacent to Brackenway, Blackheath Road, Wenhaston	Housing	Wenhaston	Private individual	Site promoted as an alteration to the existing physical limits boundary, with opportunity for two smaller properties to be accommodated.	
58	Land adjacent to Brackenway, Blackheath Road, Wenhaston	Housing	Wenhaston	Private individual	Very small site, which should be excluded from allocation due to its size.	
58	Land adjacent to Brackenway, Blackheath Road, Wenhaston	Housing	Wenhaston	Private individual	Objection due less than 0.2h SLA. Outside boundary. Previously refused Building	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Wenhaston				Permission.	
58	Land adjacent to Brackenway, Blackheath Road, Wenhaston	Housing	Wenhaston	Private individual	I believe planning permission was refused because of access issues. You will need to check your records. Frankly I think approval should have been given.	
203	Land adjacent to Brick Kiln Farm, Mells	Housing	Wenhaston	Private individual	Object, countryside, Special Landscape Area and not well connected to any settlement.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
203	Land adjacent to Brick Kiln Farm, Mells	Housing	Wenhaston	Private individual	I think the people of Mells are better placed to comment.	
203	Land adjacent to Brick Kiln Farm, Mells	Housing	Wenhaston	Private individual	This is viable agricultural land, surrounded by agricultural land, off a single-track road, in the countryside and not well connected to any settlement.	
203	Land adjacent to	Housing	Wenhaston	Private	This site is outside the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Brick Kiln Farm, Mells			individual	settlement boundary and lies within SLA. Housing on this scale would require facilities that are not available at Mells and on this basis the site is unsustainable.	
203	Land adjacent to Brick Kiln Farm, Mells	Housing	Wenhaston	SCC Highways	No footways close to site. No ped links to amenities.	
205	Land at Glenholme, Blackheath Road	Housing	Wenhaston	Private individual	Objection due outside boundary. SLA Not well connected flood risk.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
205	Land at Glenholme, Blackheath Road	Housing	Wenhaston	Private individual	Has been submitted before and then withdrawn. See no objection to its inclusion	
205	Land at Glenholme, Blackheath Road	Housing	Wenhaston	Private individual	Outside boundary, not well connected, in the SLA.	
229	Land between Hill Farm and Braeside, Blyford	Housing	Wenhaston	Private individual	I believe that this was the subject of planning application 12/0458 which	Site below the size threshold and therefore not for consideration in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane				was approved and has since been built. If otherwise the site will be outside the boundary, in the AONB and less than 0.2 hectares so not normally considered by this consultation.	this Local Plan.
229	Land between Hill Farm and Braeside, Blyford Lane	Housing	Wenhaston	Private individual	This is small and outside the remit of the Local Plan and in general I have no objection to small developments of 1 or 2 homes in appropriate places, but do not agree with development in AONB unless there are very special circumstances where the benefits to the community would outweigh the harm to the landscape.	
229	Land between Hill Farm and Braeside, Blyford	Housing	Wenhaston	Private individual	Objection, AONB, flood risk and less than 0.2ha	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane					
229	Land between Hill Farm and Braeside, Blyford Lane	Housing	Wenhaston	Private individual	Believe this has already been developed	
229	Land between Hill Farm and Braeside, Blyford Lane	Housing	Wenhaston	Private individual	See no objection	
462	Land to the East of Star Public House and South of St. Michaels Way	Housing	Wenhaston	Suffolk Wildlife Trust	Site is adjacent to Blackheath CWS. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on this site.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a review of the Neighbourhood Plan as the mechanism for planning for housing development
462	Land to the East of Star Public House and South of St. Michaels Way	Housing	Wenhaston	Private individual	In the AONB, Saxon burial site, outside the boundary, outstanding views in and out of the Parish and flood risk as is already seen on adjacent site already	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					developed.	
462	Land to the East of Star Public House and South of St. Michaels Way	Housing	Wenhaston	Private individual	Strongly object to the inclusion of this land. Agricultural land and AONB. Land is also a Saxon burial site and views from it form part of the rural back drop. Site is also outside of the physical limits boundary and would effectively merge two areas.	
462	Land to the East of Star Public House and South of St. Michaels Way	Housing	Wenhaston	Private individual	Objection: AONB Agricultural, Saxon Burial Site flood risk.	
462	Land to the East of Star Public House and South of St. Michaels Way	Housing	Wenhaston	Private individual	Contrary to the neighbourhood plan; in the AONB and a site of historical importance.	
462	Land to the East of Star Public	Housing	Wenhaston	SCC Highways	Footway link to primary school required on Hall	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	House and South of St. Michaels Way				Road. Bank would limit visibility from access onto Hall Road (removal required)	
473	Land Adjacent to Heath Road Wenhaston Ted's Field	Housing	Wenhaston	Private individual	Single track road, upgrades needed to water, sewage, electricity and telephone.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
473	Land Adjacent to Heath Road Wenhaston Ted's Field	Housing	Wenhaston	Private individual	Outside the boundary on single track unmade lane which regularly floods. Not well connected to settlement.	
473	Land Adjacent to Heath Road Wenhaston Ted's Field	Housing	Wenhaston	Private individual	Understand that this site is at high risk of flooding as well as being some way outside the settlement boundary.	
473	Land Adjacent to Heath Road Wenhaston Ted's Field	Housing	Wenhaston	Private individual	Objection: Agricultural outside boundary. Access poor flood risk	
473	Land Adjacent to	Housing	Wenhaston	Private	Outside the village	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Heath Road Wenhaston Ted's Field			individual	envelope contrary to the neighbourhood plan.	
558	Land West of Back Road	Housing / open space	Wenhaston	John Hill Farms	Land promoted for development.	Whilst the site is identified as potentially suitable in the Draft Strategic Housing and Economic Land Availability Assessment, the Council supports a review of the Neighbourhood Plan as the mechanism for planning for housing development
558	Land West of Back Road	Housing/open space	Wenhaston	John Hill Farms	Site promoted by the landowner for residential use.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a review of the Neighbourhood Plan as the mechanism for planning for housing
558	Land West of Back Road	Housing/open space	Wenhaston	Private individual	Single track road, upgrades needed to water, sewage, electricity and telephone	
558	Land West of Back Road	Housing/open space	Wenhaston	Private individual	Agricultural land, outside boundary off single track	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					lane with surface water flooding risk.	development
558	Land West of Back Road	Housing/open space	Wenhaston	Private individual	Objection Agricultural, outside boundary, poor access surface water from field causes flooding of culvert downstream	
558	Land West of Back Road	Housing/open space	Wenhaston	Private individual	Outside the village envelope contrary to the neighbourhood plan	
564	Land between Blyford Lane & Coles Hill	Housing	Wenhaston	Private individual	This was the subject of planning application 15/2765 which was refused on substantial grounds.	Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a review of the Neighbourhood Plan as the mechanism for planning for housing development
564	Land between Blyford Lane & Coles Hill	Housing	Wenhaston	Private individual	This site has already been refused. It is an agricultural site outside the settlement boundary that has SLA status. There is also a flood risk and contamination.	
564	Land between Blyford Lane &	Housing	Wenhaston	Private individual	Objection: Agricultural outside boundary Planning	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Coles Hill				permission previously refused flood risk and contamination SLA	
564	Land between Blyford Lane & Coles Hill	Housing	Wenhaston	Private individual	A steeply sloping site with poor road access - less than ideal for building on.	
564	Land between Blyford Lane & Coles Hill	Housing	Wenhaston	Private individual	Turned down because of drainage issues. Check your records.	
564	Land between Blyford Lane & Coles Hill	Housing	Wenhaston	David Houchell	Site promoted on behalf of the landowner.	
928	Land west of the Street	Housing / leisure / open space	Wenhaston	John Hill Farms	Land promoted for development.	Comments noted. Site not allocated reflecting highways issues.
928	Land west of the Street	Housing/leisure/open space	Wenhaston	John Hill Farms	Site promoted by the landowner for residential use.	Comments noted. Site not proposed for allocation reflecting highways issues.
928	Land west of the Street	Housing/leisure/open space	Wenhaston	Private individual	Historic heart of the village, agricultural land, outside boundary.	
928	Land west of the Street	Housing/leisure/open space	Wenhaston	Private individual	Outside of the village boundary and no evidence	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					to support the need for this.	
928	Land west of the Street	Housing/leisure/open space	Wenhaston	Private individual	Not enough info re: mix	
928	Land west of the Street	Housing/leisure/open space	Wenhaston	Private individual	928 – has been given approval before but that approval has lapsed, issue with surface water, could not be resolved. Check your records. If these issues are resolved could be a site for the local plan.	
1074	land west of Herons Nest, Church Road, Wenhaston	Housing	Wenhaston	Private individual	Less then 0.2 hectares	Comments reflected in the small site not being proposed for allocation.
1074	land west of Herons Nest, Church Road, Wenhaston	Housing	Wenhaston	Private individual	Very small site which should be excluded from the Local Plan.	
1074	land west of Herons Nest, Church Road,	Housing	Wenhaston	Private individual	Narrow Lane which struggles to cope with traffic using it.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Wenhaston				Development of this area would be out of keeping with the surrounding environment.	
1074	land west of Herons Nest, Church Road, Wenhaston	Housing	Wenhaston	Private individual	A single track road/Lane already cannot cope with the traffic... events at the church mean the road is often completely block leaving residents to park at the bottom of the road and walk to their houses. Outside of the envelope and a major development up the road. Do we need to extend the boundaries and build on isolated plots in areas where facilities just cannot cope?	
80	Land adj Linden House, Lower Road	Housing	Westerfield	Westerfield Parish Council	Should be rejected due to poor access.	Site identified as unavailable in Draft Strategic Housing and Economic Land

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						Availability Assessment.
125	Westerfield Road, adjacent to Cubitt's site	Housing	Westerfield	Westerfield Parish Council	Should be rejected as it should remain as a green space.	Site identified as potentially suitable in Draft Strategic Housing and Economic Land Availability Assessment however not identified as an allocation. Existing allocation in Westerfield carried over into new Local Plan.
125	Westerfield Road, adjacent to Cubitt's site	Housing	Westerfield	Greenways Project	Important wildlife habitat and provides opportunity for creation of 'green rim' around Ipswich.	
160	Land at Mill Farm, Westerfield Road	Housing or employment	Westerfield	Westerfield Parish Council	No objection	Site is not available and therefore not being taken forward in the Local Plan.
160	Land at Mill Farm, Westerfield Road	Housing or employment	Westerfield	Private individual	Site has a number of positive elements in terms of environment and community. Site within walking distance of train station, on a bus route, close to employment and schools with services readily available.	Site is not available and therefore not being taken forward in the Local Plan.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
168	Land at Lower House Farm, Lower Road	Housing	Westerfield	Westerfield Parish Council	No objection to development of this site.	Site is not available and therefore not being taken forward in the Local Plan.
192	Land opposite Corner Croft, Sandy Lane	Housing	Westerfield	SCC Highways	Footway link existing footway on Lower Road required (large distance)	The strategy for Westerfield is to rely on an existing local plan housing allocation and allow the village to assimilate impacts of the nearby Ipswich Garden Suburb.
192	Land opposite Corner Croft, Sandy Lane	Housing	Westerfield	Westerfield Parish Council	Should be rejected due to being agricultural land and having no paths.	Site identified as potentially suitable, however access is identified as an issue.
521	Land north of Church Lane, west of Moss Lane	Housing	Westerfield	Westerfield Parish Council	No objection	Site is identified as potentially suitable in the SHELAA but is not proposed for allocation.
684	Land adjacent to Westerfield Railway	Housing	Westerfield	Westerfield Parish Council	Should be a high priority for development as a brownfield site.	Site identified as potentially suitable in Draft Strategic Housing

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and Economic Land Availability Assessment however not identified as an allocation. Existing allocation in Westerfield carried over into new Local Plan.
712	Land south of Lower Road	Housing	Westerfield	Westerfield Parish Council	Is already allocated	The site has not been assessed as it is already allocated in the Site Allocations and Area Specific Policies DPD.
805	Land adj Old Glebe House, Main Road	Open space	Westerfield	Tuddenham St Martin Parish Council	Strong objection as would impinge on separation of the village from Ipswich.	Site made available for open space (incorrectly shown as housing in Issues and Options document)
805	Land adj Old Glebe House, Main Road	Open space	Westerfield	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area	Site not taken forward as it is not within, adjoining, adjacent or well related to the form of the settlement.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse ecological impacts.	
805	Land adj Old Glebe House, Main Road	Open space	Westerfield	SCC Highways	Remote from local amenities. Significant length of footways required.	
806	Land adj to Giffords, Tuddenham	Open space	Westerfield	Tuddenham St Martin Parish	Strong objection as would impinge on separation of the village from Ipswich.	Site made available for open space (incorrectly shown as housing in

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Lane			Council		Issues and Options document)
806	Land adj to Giffords, Tuddenham Lane	Open space	Westerfield	Suffolk Wildlife Trust	Site represents a large block of land which is likely to contain species and/or habitats of nature conservation interest. Development in this area could also conflict with the Ipswich 'Green Rim' being proposed by Ipswich Borough Council as part of their Local Plan, this could result in significant detrimental impacts on the potential availability of greenspace in and around the town. Further assessment is therefore required to determine whether development in this location is likely to result in any adverse	Site not taken forward as it is not within, adjoining, adjacent or well related to the form of the settlement.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					ecological impacts.	
806	Land adj to Giffords, Tuddenham Lane	Open space	Westerfield	SCC Highways	Remote from local amenities. Significant length of footways required.	
848	land to the east of Westerfield Hall Farm, Westerfield Road	Housing	Westerfield	SCC Highways	Footway along frontage with crossing linking to existing footway. Extension of 30 mph speed limit.	Site is unavailable and therefore is not being taken forward.
4	land to the rear of Sunnyside, The Hill	Housing	Westleton	Westleton Parish Council	We are against development, access is only available via White's Lane an unmade single track bridleway.	Comments regarding the site's availability, vehicle access and environmental setting are reflected in the site not being proposed for allocation.
4	land to the rear of Sunnyside, The Hill	Housing	Westleton	Gregsons Solicitors	Site withdrawn and confirmed as not being available by the landowner.	
4	land to the rear of Sunnyside, The Hill	Housing	Westleton	Amedee Turner	Site not available for development, an integral part of the 13-acre unitary garden of the Barn Westleton.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
4	land to the rear of Sunnyside, The Hill	Housing	Westleton	Northland Ltd	Small site covered by trees on the edge of the conservation area. Potential impact on setting of a listed building.	
371	Land at Cherry Lee, Darsham Road	Housing	Westleton	Westleton Parish Council	Support development of this site.	Westleton is identified as a small village in the settlement hierarchy and is identified as having some potential for growth. Highways and environmental issues reflected in the preferred site for allocation being 554 at the south of the village.
371	Land at Cherry Lee, Darsham Road	Housing	Westleton	Northland	Land promoted for development.	Site identified as potentially suitable in SHELAA, however with issues related to access.
407	land to the east of Wash Lane	Housing	Westleton	Westleton Parish	We are against development on this site,	Site is unavailable and therefore is not being

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				Council	adjacent to a grade II listed building.	taken forward.
407	land to the east of Wash Lane	Housing	Westleton	Northland Ltd	Site within a conservation area and close proximity to listed buildings. Development on this site has a high chance of harming the setting of the listed buildings.	
442	Land north of Love Lane	Housing	Westleton	Westleton Parish Council	Against development of this site, access is via a single track unmade road and designated as a area to be protected from development.	Site is unavailable and therefore is not being taken forward.
442	Land north of Love Lane	Housing	Westleton	Private individual	Site has been considered in the past and found unsuitable. Surrounded by housing and very limited access to the site.	
442	Land north of Love Lane	Housing	Westleton	Private individual	Site is completely unsuitable because of adverse impact on	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					surrounding listed buildings, extreme contours, would lead to overlooking, impact on flora and fauna, dangerous access and inadequate service provisions.	
442	Land north of Love Lane	Housing	Westleton	Northland Ltd	Site is a designated area to be protected from development and no development potential.	
447	Land to the South East of Blythburgh Road, Westleton	Housing	Westleton	Westleton Parish Council	Strongly oppose development on this site – excessive speeding, no footpath on the site of the road immediately south of the playing field would lead to dangerous situation for pedestrians which must be avoided.	
447	Land to the South East of Blythburgh	Housing	Westleton	Suffolk Wildlife Trust	Site is in close proximity to Minsmere-Walberswick SPA, Minsmere-	Site not taken forward as a potential allocation, as the preferred site is considered to provide a more appropriate scale of development for the village.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Westleton				Walberswick Heaths SAC, Minsmere-Walberswick Ramsar site and Minsmere-Walberswick Heaths and Marshes SSSI. Further assessment is required to determine whether development in this location is likely to result in an adverse impact on these sites.	
447	Land to the South East of Blythburgh Road, Westleton	Housing	Westleton	Northland Ltd	Site immediately adjacent to Minsmere nature reserve which hosts a range of Ramsar, SAC, SPA and SSSI adjacent to the AONB.	
554	Land West of B1125	Housing and open space	Westleton	Private Individual	Land promoted for development	Site proposed for allocation in the First Draft Local Plan.
554	Land West of B1125	Housing and open space	Westleton	Westleton Parish Council	Oppose development on this site – speeding problem on the road	The comments have been considered in identifying preferred sites. Westleton is
554	Land West of	Housing and open space	Westleton	Savills	Site promoted by the	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	B1125				landowner for residential use.	identified as a small village in the settlement hierarchy and is identified as having some potential for growth. Reflecting the comments, a speed limit extension, footway and crossing point are included within the policy requirements.
554	Land West of B1125	Housing and open space	Westleton	Northland Ltd	Site immediately adjacent to the Special Landscape Area and would adversely affect its setting.	
554	Land West of B1125	Housing and open space	Westleton	SCC Highways	Footway along Reckford road required. Potential 30 mph speed limit extension.	
877	Land to the rear of The Vicarage, Darsham Road	Housing	Westleton	Westleton Parish Council	Support development on this site, together with the Vicarage. Residents in the village have formed a community interest company which is negotiating to purchase the land from the church. Project is supported by the Parish Council.	
877	Land to the rear of The Vicarage,	Housing	Westleton	Northland Ltd	Poorly related to the setting of the listed church. Site is	Noted. Site not understood to not be available for allocation through the Local Plan and is therefore not identified as a potential site.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Darsham Road				also on high ground with direct views to the listed buildings. Access would also be difficult.	
943	Land to rear of 2 - 8 Grangeview, Yoxford Road, Westleton	Housing	Westleton	Westleton Parish Council	We have no objection to this site. There is a covenant on the land specifically barring building work.	Comments reflected in the site not being proposed for allocation for housing development.
943	Land to rear of 2 - 8 Grangeview, Yoxford Road, Westleton	Housing	Westleton	Northland Ltd	Directly opposite grade 2 listed Grange and within the conservation area which would cause demonstrable harm to the heritage assets.	
7	Land adj to 14 and 16 The Crescent, Dallinghoo Road	Housing	Wickham Market	Private individual	Traffic flows, together with narrow minor rural roads with their 'pinch points' must be a constraint on most sites for development in Wickham Market.	An emerging neighbourhood plan is addressing preferred sites for new housing in Wickham Market.
499	Land West of Old School Farm,	Housing	Wickham Market	Hopkins Homes	Site promoted by the landowner for residential	An emerging neighbourhood plan is

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	High Street, Wickham Market				purposes.	addressing preferred sites for new housing in Wickham Market.
499	Land West of Old School Farm, High Street, Wickham Market	Housing	Wickham Market	Private individual	Site is too large a development and not proportionate to existing village development. Would blur the separation between Wickham Market and Pettistree and be hugely detrimental to the village and its environment.	
499	Land West of Old School Farm, High Street, Wickham Market	Housing	Wickham Market	SCC Highways	Footway widening required along frontage plus potential improvements to Walnuts lane towards school	
582	Land rear of Deben Court	Housing	Wickham Market	Private individual	Completely unsuitable, would lead to creation of a developed corridor linking towns of Ipswich and Felixstowe.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
816	Land adj to Thong Hall, Thong Hall Road and South of Dallinghoo Road	Housing	Wickham Market	Private individual	Traffic flows, together with narrow minor rural roads with their 'pinch points' must be a constraint on most sites for development in Wickham Market.	An emerging neighbourhood plan is addressing preferred sites for new housing in Wickham Market.
816	Land adj to Thong Hall, Thong Hall Road and South of Dallinghoo Road	Housing	Wickham Market	SCC Highways	Significant length of footway required on Dallinghoo Road. Potentially also widening of road and speed limit reduction.	
878	Land off Yew Tree Rise	Housing	Wickham Market	SCC Highways	Not confident that Yew Tree Rise could accommodate this level of development traffic. Spring Lane is too narrow without footways.	An emerging neighbourhood plan is addressing preferred sites for new housing in Wickham Market.
1055	Land adj. Gelham Hall, North of Dallinghoo Road, Wickham	Housing	Wickham Market	Private individual	Traffic flows, together with narrow minor rural roads with their 'pinch points' must be a constraint on most sites for development	An emerging neighbourhood plan is addressing preferred sites for new housing in Wickham Market.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Market				in Wickham Market.	
1055	Land adj. Gelham Hall, North of Dallinghoo Road, Wickham Market	Housing	Wickham Market	SCC Highways	Significant length of footway required on Dallinghoo Road. Potentially also widening of road and speed limit reduction.	
305	Land north of Three Corners, B1077	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Do not support allocation, remote from village.	Site not taken forward as below the site size threshold.
491	Land opposite Burwash Cottages Main Road, Witnesham	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Refuse – dismissed at appeal.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
555	Land off Sandy Lane	Housing	Witnesham	Swilland	Did not support, application	Comments noted.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
				& Witnesham Grouped Parish Council	withdrawn. Access issue	Alternative sites selected in Witnesham.
555	Land off Sandy Lane	Housing	Witnesham	Landbridge	Site promoted by the landowner for residential use..	
774	Land at Mow Hill, Witnesham	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Support development of this site, along with adjacent area 775.	Support noted. Part of the site has been identified as a preferred site. Witnesham is a small village in the settlement hierarchy and has some potential for growth.
775	Land at Mow Hill, Witnesham	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Support development of this site, along with adjacent area 774.	Support noted. Part of the site has been identified as a preferred site. Witnesham is a small village in the settlement hierarchy

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
						and has some potential for growth.
995	Land to the south of Primary School, Witnesham	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Allocation supported, may not be deliverable because of access issues.	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
1049	Land at and surrounding Greenway, Hall Lane	Housing	Witnesham	Swilland & Witnesham Grouped Parish Council	Flooding issue.	The site is not made available for consideration in this Local Plan.
373	Land at Wyevale Garden Centre, Grundisburgh Road	Housing	Woodbridge	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists	Comments noted. Site identified as unavailable in Draft SHELAA.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					wishing to visit the town. To maintain the vibrancy of the town and the economic viability of retailers, and to encourage tourism, it is essential that parking needs are catered for.	
373	Land at Wyevale Garden Centre, Grundisburgh Road	Housing	Woodbridge	Woodbridge Town Council	WTC is happy for small scale development west of the A12 provided it is low density. Any large scale development here should not be permitted.	
373	Land at Wyevale Garden Centre, Grundisburgh Road	Housing	Woodbridge	Woodbridge Society	As sites 373 and 514 are already developed, albeit not for housing, we would not object in principle to their development for housing, provided that the existing activities are not displaced to other sites beyond the A12.	
373	Land at Wyvale	Housing	Woodbridge	SCC	Nearest crossing facility on	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Garden Centre, Grundisburgh Road		e	Highways	A12 is some distance from site, feasibility of additional crossing would need to be investigated	
486	Queen's House, Woodbridge	Housing	Woodbridge	Seckford Foundation	Land promoted for development.	Noted that site has planning permission.
486	Queen's House, Woodbridge	Housing	Woodbridge	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists wishing to visit the town. To maintain the vibrancy of the town and the economic viability of retailers, and to encourage tourism, it is essential that parking needs are catered for.	Planning permission for 6 homes (DC/16/4008/FUL).
486	Queen's House, Woodbridge	Housing	Woodbridge	Woodbridge Town Council	Agreed as it is in the boundary of the town and sustainable within the true sense of the word	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
486	Queen's House, Woodbridge	Housing	Woodbridge	Woodbridge Society	Already been agreed as suitable for housing.	
510	Toller's Field, Woodbridge School, IP12 4JW	Housing	Woodbridge	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists wishing to visit the town. To maintain the vibrancy of the town and the economic viability of retailers, and to encourage tourism, it is essential that parking needs are catered for.	Comments noted. It is not demonstrated that the site is surplus to education or playing field needs or that alternative provision is demonstrated. The site is within physical development limits so this policy is applicable to any planning application.
510	Toller's Field, Woodbridge School, IP12 4JW	Housing	Woodbridge	Woodbridge Town Council	Agreed as it is in the boundary of the town and sustainable within the true sense of the word	
510	Toller's Field, Woodbridge School, IP12 4JW	Housing	Woodbridge	Woodbridge Society	If developed presumably an alternative site for a playing field will be required	
510	Toller's Field,	Housing	Woodbridge	The	Site promoted by	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Woodbridge School, IP12 4JW		e	Seckford Foundation	landowner for residential development.	
510	Toller's Field, Woodbridge School, IP12 4JW	Housing	Woodbridge	SCC Highways	No comments - within existing urban/residential setting.	
513	Land at Saddlemaker's Lane, Woodbridge, IP13 6AA	Housing	Woodbridge	SCC Highways	Direct access onto A12 may be required. May impact upon Melton crossroads without mitigation or improvement to junction	The site has been identified as not suitable through the Draft Strategic Housing and Economic Land Availability Assessment as it is not within, adjoining or well related to the form of the settlement.
514	Land at Grundisburgh Road, Woodbridge, IP13 6HX	Housing	Woodbridge	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists wishing to visit the town.	Comments noted. The strategy for the Local Plan does not focus on growth in Woodbridge.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					To maintain the vibrancy of the town and the economic viability of retailers, and to encourage tourism, it is essential that parking needs are catered for.	
514	Land at Grundisburgh Road, Woodbridge, IP13 6HX	Housing	Woodbridge	Woodbridge Town Council	WTC is happy for small scale development west of the A12 provided it is low density. Any large scale development here should not be permitted.	
514	Land at Grundisburgh Road, Woodbridge, IP13 6HX	Housing	Woodbridge	Woodbridge Society	As sites 373 and 514 are already developed, albeit not for housing, we would not object in principle to their development for housing, provided that the existing activities are not displaced to other sites beyond the A12.	
514	Land at Grundisburgh	Housing	Woodbridge	Martin Robeson	The site has no specific constraints to delivery and	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Road, Woodbridge, IP13 6HX			Planning Practice	is immediately adjoining the existing urban area.	
514	Land at Grundisburgh Road, Woodbridge, IP13 6HX	Housing	Woodbridge	Trustee of the Conveyance for Scarfe Trustees	Site promoted by the landowner for housing, open space and retail uses for up to 5 units.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge / Hasketon	Savills	Land promoted for development. Amendment to site area.	Amendment to site area has been made. The strategy for the Local Plan does not focus on growth in Woodbridge.
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Private individual	Any further housing development on the outskirts of Woodbridge would adversely affect those currently living in Woodbridge and tourists wishing to visit the town. To maintain the vibrancy of the town and the economic viability of retailers, and to	The strategy for the Local Plan does not focus on growth in Woodbridge.

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					encourage tourism, it is essential that parking needs are catered for.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Woodbridge Town Council	We agree this can be developed for education and leisure or employment, but do not wish to see any retail as we need to protect the shopping experience in Woodbridge. We also do not wish to see any housing.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Woodbridge Society	If developed presumably an alternative site for a playing field will be required.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Savills	Site provides a sustainable extension to the west of Woodbridge to provide much needed housing with the opportunity to incorporate community uses and significant open space.	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Suffolk Wildlife Trust	Site includes Blunt's Wood Meadow CWS and development would therefore result in a loss of CWS.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	Private individual	Large mixed-use area 551 is too much for transport infrastructure and may cause surface water run-off problems in low-lying parts of Woodbridge.	
551	Land West of The A12	Housing/Retail/Office/Education/Leisure	Woodbridge	SCC Highways	Accesses onto A12 and/or B1079 (with improvement). Sustainable links to Woodbridge across A12 required.	
22	The Pig Farm, Middleton Road	Housing	Yoxford	EDF Energy	EDF Energy is considering its options for improving the A12/B1122 junction and requests that land be allocated for the junction improvement proposals as part of any allocation.	Comments and infrastructure and landscape information reflected in the site not being proposed for allocation for new housing. Site is not

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
22	The Pig Farm, Middleton Road	Housing	Yoxford	Private individual	Developing the site could provide needed accommodation but consideration should be given to the possibility of flooding and lack of safe crossing provision across the A12.	made available for consideration in the First Draft Local Plan.
22	The Pig Farm, Middleton Road	Housing	Yoxford	SCC Highways	Access from B1122. New footway required on northern side of B1122	
66	land to the rear of Field End, Little Street	Housing	Yoxford	Private individual	Road is too narrow for two large vehicles to pass one another. Sewers are smelly and may well need work if it has to carry more waste.	Comments noted. The site is not made available for consideration for development in the First Draft Local Plan.
66	land to the rear of Field End, Little Street	Housing	Yoxford	Private individual	Plot 66 has been developed and this map does not reflect the current situation	
76	Land adj to Toad End, Little Street	Housing	Yoxford	Private individual	Any development here would be dangerous with regards to road users. The road is narrow and this plot	Comments noted. The site is not made available for consideration for

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					is on the approach to a hill. Sewers and drains do not cope with current levels of development	development in the First Draft Local Plan.
76	Land adj to Toad End, Little Street	Housing	Yoxford	Private individual	Any development here would be dangerous with regards to road users. The road is narrow and this plot is on the approach to a hill. Sewers and drains do not cope with current levels of development	
166	Land adj Clematis Cottage, Little Street	Housing	Yoxford	Private individual	Road is too narrow for two large vehicles to pass one another. Sewers are smelly and may well need work if it has to carry more waste.	Comments noted. Site not proposed for allocation reflecting flood risk and availability information and below site size threshold of 0.2ha.
166	Land adj Clematis Cottage, Little Street	Housing	Yoxford	Private individual	Site floods annually and any development could displace this flooding to neighbouring developments. Poor drains and sewers would be	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					further compromised	
166	Land adj Clematis Cottage, Little Street	Housing	Yoxford	Private individual	Site should not be developed. They have both flooded in recent memory	
167	Land opposite The Hollies, Little Street	Housing	Yoxford	Private individual	Road is too narrow for two large vehicles to pass one another. Sewers are smelly and may well need work if it has to carry more waste.	Comments noted. Site not proposed for allocation reflecting flood risk and landscape evidence.
167	Land opposite The Hollies, Little Street	Housing	Yoxford	Private individual	Site floods annually and any development could displace this flooding to neighbouring developments. Poor drains and sewers would be further compromised	
167	Land opposite The Hollies, Little Street	Housing	Yoxford	Private individual	Site should not be developed. They have both flooded in recent memory	
441	land west of Cullcott Close	Housing	Yoxford	Private individual	Allowing development on sites 441 or 454 could set a dangerous precedent with	Site not proposed for allocation reflecting environmental impact

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
					regards to use of historic parkland. A large development would also upset the integrity and character of the village	concerns bordering the Historic Parkland to the north.
441	land west of Cullcott Close	Housing	Yoxford	Private individual	Site 441 is also likely to be outside the village boundary and likely to be on a Historic Parkland site included in SPG6 Historic parks and gardens. For those reasons the site should not be developed	
454	Land West of Old High Road, Yoxford	Housing	Yoxford	Private individual	Allowing development on sites 441 or 454 could set a dangerous precedent with regards to use of historic parkland. A large development would also upset the integrity and character of the village	Comments noted. Site not proposed for allocation for development. Development of the site would result in loss of Historic Park and Garden which is considered inappropriate.
454	Land West of Old High Road,	Housing	Yoxford	Private individual	Site 454 is also likely to be outside the village	

Site Number	Site Name	Proposed use	Parish	Submitted by	Comments	How have these comment been addressed
	Yoxford				boundary and likely to be on a Historic Parkland site included in SPG6 Historic parks and gardens. For those reasons the site should not be developed	

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
N/A	Land to the rear of Rose Hill (existing allocation SSP3)	Housing	Aldeburgh	Aldeburgh Town Council	Support for this site being developed.	Comment noted. Site allocations from the Site Allocations and Area Specific Policies DPD have been carried over.
<b>Q144 – Are there any other sites you are aware of which the Council should consider?</b>						
N/A	North Sea Hotel	Not specified	Felixstowe	Felixstowe Town Council	North Sea Hotel site	The site has not been promoted as sites by landowners through the Local Plan. The policies within the plan would support development on these sites in principle if it were to come forward.
N/A	Convalescent Hill Car Park	Not specified	Felixstowe	Felixstowe Town Council	Convalescent Hill Car Park and surrounding area	The site has not been promoted as sites by landowners through the Local Plan. The policies within the plan would support development on these sites in principle if it were to come forward.
N/A	Woodbridge Airbase	Not specified	Sutton	Private Individual	Woodbridge air base should be added to potential sites list as it has facilities and is	The airbase has not been promoted for consideration through the Local Plan by the landowner.

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
					a brownfield site.	
N/A	Langley Avenue playing field	Not specified	Felixstowe	Felixstowe Town Council	Langley Avenue playing field should be earmarked for cemetery expansion if at any time it is no longer required for its current use.	Comment noted. The Infrastructure Delivery Framework refers to increased cemetery provision across the District. It would need to be demonstrated that the playing field is no longer required or can be relocated for the land to be considered suitable for cemetery provision.
N/A	N/A	N/A	Hollesley	Private individual	The old officers club at Oak Hill, Hollesley should be looked at as a potential building site.	As previously developed land this could be reused for appropriate uses subject to availability and promotion by the landowner.
<b>Summary of responses received under Questions 143 and 144 not related to specific sites</b>						
<b>Question 143 – Which sites do you consider appropriate for future consideration by the Council?</b>						
<b>Question 144 – Are there any other sites you are aware of which the Council should consider?</b>						
N/A	N/A	N/A	N/A	Private Individual	No sites should be considered for development	The Local Plan must plan to meet the identified housing need. Allocating sites enables a planning approach to be taken.
N/A	N/A	N/A	N/A	Private individual	Do not wish to have development of 10 dwellings in one place	The Local Plan identifies a range of site sizes for allocation. Development on larger sites enables infrastructure and affordable housing provision.
N/A	N/A	N/A	N/A	Private Individual	Sites should exclude areas covered by TPOs	Impacts on TPOs have been considered through the SHELAA and Sustainability Appraisal process and references to protecting these incorporated into site allocations policies where necessary,
N/A	N/A	N/A	N/A	Marlesford Parish Council	Marlesford is not suitable for new housing allocations.	Marlesford is identified as within the countryside in the settlement hierarchy and therefore it is not appropriate to

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
						allocate sites in Marlesford.
N/A	N/A	N/A	N/A	Felixstowe Town Council	Total from sites 625, 644, 800, 801, 802, 941, 1091 would be 1340 which should be considered with potential contribution from Trimley St Martin and Trimley St Mary.	The strategy includes development of up to 2,000 dwellings at North Felixstowe Garden Neighbourhood, as delivering a comprehensive approach to leisure led development to the north of Felixstowe.
N/A	N/A	N/A	N/A	Suffolk Preservation Society	All sites should be assessed in accordance with their landscape and heritage impact, together with proportionality to host settlement.	Impacts on landscape and heritage have been considered through the SHELAA and Sustainability Appraisal process.
N/A	N/A	N/A	N/A	Private Individual	Development should be kept to the west of the A12 to avoid impacts on environmental designations.	Potential impacts on environmental designations have been considered through the SHELAA and the Sustainability Appraisal.
N/A	N/A	N/A	N/A	Private Individuals	Brownfield sites should be considered first	The sustainability Appraisal has considered whether a site would result in loss of agricultural land, however as a largely rural District there are relatively few brownfield opportunities.
N/A	N/A	N/A	N/A	Suffolk Coast and Heaths	Proposals for major development within	Impacts on the AONB and other designations have been considered

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
				AONB	the AONB should be resisted. Development affecting the setting of the AONB or close to protected sites should also be avoided.	through the Sustainability Appraisal and policy requirements incorporated where necessary.
N/A	N/A	N/A	N/A	Private Individual	Sites should be developed on the A12/A14 corridors.	The strategy for the Local Plan focuses growth on the A12 corridor.
N/A	N/A	N/A	N/A	Private Individual	Appropriate sites for consideration include East of Ipswich parishes, Rushmere St Andrew, Kesgrave, Felixstowe, Woodbridge, Aldeburgh, Framlingham, Leiston and Saxmundham.	Noted. The strategy focuses on Felixstowe and Saxmundham, and it is noted that other urban areas have received development over recent years.
N/A	N/A	N/A	N/A	Bromeswell Parish Council	Sites in Felixstowe, the Trimleys, Nacton, Rushmere, Kesgrave, Foxhall and Martlesham should be priorities for development due to proximity to A14	The proposed strategy focuses on Felixstowe, Saxmundham, the A12 and rural areas. It is acknowledged that growth in the east Ipswich area will largely come forward through the Brightwell Lakes development over the plan period.

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
					corridor.	
N/A	N/A	N/A	N/A	Historic England	Refer to comments provided through Felixstowe Area Action Plan.	Consideration of impacts on the historic environment has formed part of the SHELAA and Sustainability Appraisal process.
N/A	N/A	N/A	N/A	Private Individual	There should be a presumption against development on a site unless the Town or Parish Council are supportive.	Comments from Town and Parish Councils have been considered along with other factors when selecting proposed sites for allocation.
N/A	N/A	N/A	Blythburgh	Blythburgh Parish Council	The maps do not show recent developments or permissions. Any new development in Blythburgh should satisfy the needs of the community, be of exceptional quality and balance the building stock.	Noted. The maps only show potential sites for consideration for allocation in the new Local Plan for clarity as comments were only being invited on those sites. Design policies are contained in the new Local Plan.
N/A	N/A	N/A	Framlingham	Historic England	Great care should be taken in Framlingham, also in terms of cumulative effects.	The Local Plan does not propose any sites in Framlingham, and provides an opportunity for a review of the Neighbourhood Plan to identify sites.
N/A	N/A	N/A	Hacheston	Private individual	Should be no more than 10 additional dwellings allocated for Hacheston – lack	No allocations are proposed in Hacheston.

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
					of services and facilities	
N/A	N/A	N/A	Hollesley	Private individual	Development in Hollesley should be kept to a minimum due to distance needed to travel to places of employment.	Noted, however Hollesley is identified as a Large Village.
N/A	N/A	N/A	Kelsale cum Carlton	Private Individual	Sites should not be developed in Kelsale as this will have impacts in relation to the village character and transport. There is no shop. Some sites are no available.	The Local Plan identifies the Neighbourhood Plan as being the mechanism to identify land for housing. Availability checks have been undertaken and unavailable sites not progressed any further.
N/A	N/A	N/A	Kelsale cum Carlton	Kelsale cum Carlton Parish Council	Neighbourhood Plan considering sites.	Noted. The Local Plan policy SCLP12.1 sets out the approach to designated Neighbourhood Plan areas.
N/A	N/A	N/A	Saxmundham	Private individual	No sites in Saxmundham should be developed due to impacts on infrastructure.	Noted, however strategic scale growth at South Saxmundham Garden Neighbourhood will enable the delivery of a new school. Health provision in Saxmundham is identified in the Infrastructure Delivery Framework.
N/A	N/A	N/A	Westerfield	Westerfield Parish Council	Westerfield has had a large amount of development recently and should	There are no new sites proposed for allocation in Westerfield, however existing allocation to the south of Lower Road is carried forward.

Site Number	Site Name	Proposed use	Parish / Town	Submitted by	Comments	How have these comments been addressed
					not therefore have further development. Should there be any further development Westerfield would benefit from a shop.	
N/A	N/A	N/A	Wickham Market	Wickham Market Parish Council	Wickham Market Neighbourhood Plan committee are currently identifying potential suitable development sites.	Noted. The Local Plan policy SCLP12.1 sets out the approach to designated Neighbourhood Plan areas.
N/A	N/A	N/A	Yoxford	Yoxford Parish Council	Support some development in Yoxford but concerned about larger developments. If larger development enabled provision of a new village hall this may be supported.	No sites have been identified as preferred sites in Yoxford, and of those which were identified as suitable they may not be of sufficient size to accommodate a village hall.

# 5. How we took comments into account from the First Draft for the new Suffolk Coastal Local Plan (2018) Consultation

This section of the document explains how the Council took into account comments raised during the Preferred Options for the new Suffolk Coastal Local Plan (2018) Consultation when writing the Final Draft Local Plan consultation (2019)

## Analysis of Responses to Questions on Preferred Options

### Summary of Responses Chapters 1-11

#### 1 Introduction

#### Suffolk Coastal Context

Total comments	Support	Object	Observation
56	6	26	24

#### Statutory Consultees

Anglian Water suggest text in paragraph 1.15 is amended to read “East Anglia is recognised by ~~Anglian Water~~ the Environment Agency as an area of ~~severe~~ serious water stress.”

Historic England welcome the references to the Historic Environment but suggest it would be useful to start quantifying the number of scheduled monuments and historic parks and gardens within the text. The document also needs consistent references to natural, built and historic environment as part of the positive strategy for the conservation and enjoyment of the uniquely attractive District.

RSPB suggest that text in the Key Issues table should read “Need to ensure that areas of biodiversity value are protected and enhanced” as this would be more consistent with other statements and the revised National Planning Policy Framework.

### **Parish and Town Councils**

Kettleburgh Parish Council is disappointed that the consultation period falls within the normal summer holiday period when a number of residents are not available to comment. There are a lot of consultation documents (including the latest National Planning Policy Framework) and thus there could be a need for more changes.

Kelsale-cum-Carlton Parish Council is grateful to contribute to the ongoing refinement of the First Draft Local Plan and is pleased to see that many observations made during the previous consultation have been incorporated or answered by further clarification. However the Parish makes the following points:

- Accessibility of the document via the internet and complementary volumes may have inhibited participation for some segments of the community.
- Disappointed that the impact of holiday parks on the local community have not been addressed in the Plan.
- Plan needs more reference to the creation of East Suffolk District Council.
- Actions and targets in respect of broadband infrastructure should be included within the Local Plan.
- The Local Plan lacks heart although it broadly represents a significant step up in both clarity, policy direct and cohesion.

Kelsale-cum-Carlton Parish Council suggest that it would be more relevant to provide further detail than just the 2016 population estimate – perhaps it would be more sensible to use the 2023 electorate forecast used in the warding proposals.

Martlesham Parish Council outline that there is no clear policy on air quality. Air quality is intrinsic to the Local Plan and its policies and more joined up planning is needed between the Local Plan and the Council’s Air Quality Annual Report.

Sudbourne Parish Council outline that public transport in rural areas has declined to a point where it is negligible in its capacity and scarcely integrated to meet the needs of travellers and residents. Sustainable transport is essential for the health and wellbeing of the District. The Parish Council strongly agrees with the statement outlined in paragraph 1.14.

Aldringham-cum-Thorpe Parish Council note that paragraph 1.12 mentions 48km of coastline but the image on page 9 shows 58km of coastline.

Marlesford Parish Council outline that over the 25 year period from 2011, an increase in dwellings of over 17% is a very large increase. No comparison is given with the projections from other areas of the country.

### **Other organisations**

Health & Safety Executive state there are a number of HSE licensed explosives sites in the area which have safeguarding consultation zones. The relevant statutory consultations will be required for development within these areas. The planning authority may wish to note that any review may result in the facilities explosives capacity being significantly reduced, possibly putting commercial viability in jeopardy.

Save Felixstowe Countryside object to the lack of acceptance that the Felixstowe branch line is not to be upgraded and that suggestion that an Ipswich Northern Bypass will alleviate the impact of blockages on the A14. The A12 from Martlesham would benefit from being upgraded.

The Suffolk Coastal Disability Forum highlights the lack of reference to ensuring that improvements and developments assist disabled people. The Local Plan should set out to improve the area for all residents including older people and disabled people. The Equality Impact Assessment should include information from the Papworth Trusts 2018 Report as opposed to the outdated and limited information gained from the 2011 Census.

### **Developers/Landowners**

Langmead Group highlight that it is concerning there is no mention of agriculture within this section. Agriculture should be identified as key employment sector within the District.

FCC Environment supports the statement of paragraph 1.24 that “the tourism industry is a key contributor to the local economy”.

The Seckford Foundation proposes a new sustainable mixed use community on land to the west of the A12 at Woodbridge.

### **Members of the Public**

Support:

Pleased to hear that the needs and aspirations of the local community will be listened to.

Object:

There is no demand and therefore no justification for the increased growth of residential properties in Saxmundham.

- There is no solution for increased provision of medical facilities in Saxmundham.
- What measures are being taken to make improvements to Saxmundham railway station?
- Police presence in the town is required if the population is to be allowed to increase on such a large scale.
- Air quality has already been compromised by recent development which increases significantly the vehicular traffic through the heart of Saxmundham.
- The Layers is an Area of Outstanding Natural Beauty and played a vital role in the development of tanks used in the D Day landings and the network of public footpaths is well used by local residents.
- Land at the top of Church Hill is ideally suited to new development.

- Not enough employment opportunities in Saxmundham for the existing population and therefore no justification for more houses.

Air quality will be impacted by large amount of houses proposed and the associated traffic and increased amount of diesel trains.

Port of Felixstowe does not represent employment opportunities as they are putting people on zero hours contracts and becoming more automated. Businesses which operate from the Port do not support or service the local area. BUT farmers do support the local area and supply food for us to eat. Losing agricultural land will reduce our ability to produce our own food.

Object to houses being dumped on the Felixstowe peninsula, where are all the new residents going to work as there are no jobs now. As one of the driest parts of the country where are we going to “magic” the water supply from to meet the needs of new houses in Felixstowe? A14 is an important freight route and is fundamental to the success of the Port of Felixstowe and the communities surrounding Ipswich. Building all these houses in Felixstowe at the end of the A14 will bring grid lock and make the A14 a giant car park.

Suffolk does have a beautiful natural environment, but excessive development will completely destroy the character of each village. Flooding already takes place, transport infrastructure is stretched, primary schools are stretched and developments will destroy wildlife.

Land at Eastward Ho recreation ground needs to be protected to enable space for people to play and relax. Infrastructure in Felixstowe is lacking. Development will also have a visual impact on the local community. Proposed development would leave Felixstowe a worse place to live for existing residents.

Strongly object to development of more houses in the Trimley area without any consideration of water pressure of existing properties. This is all about profit and greed and not about appropriate levels of planning to meet local needs.

How is it possible to allow developments on the Felixstowe Peninsula, a region with outstanding natural beauty and rich for agriculture? The previous Local Plan stated that large scale developments will damage the character of the area yet this Local Plan directs development to the area. Political ideology has changed and this is knowingly negligent.

Converting farmland to employment land is not a good use of land and does not support rich biodiversity. East Anglia is recognised as an area of severe water stress and concreting over the land will increase flood risk.

The Local Plan does not support local businesses, the Orwell Bridge is a constraint for the area and the road infrastructure is no better. The Port of Felixstowe is losing business to other ports and the internet connections are poor. Young people leave the area for University and then do not come back.

Strongly object to large industrial area at Innocence Farm as this would be detrimental to the area and discourage people from visiting the area.

Suffolk Coastal is a popular tourist destination and faces challenges in respect of second homes or units for tourism accommodation.

The Local Plan does not provide any guarantee that new housing allocations proposed will be brought by local people and not end up as second homes or tourist accommodation. The excuse of affordable housing is a spent one, the houses being built are not targeted at first time buyers.

Local Planning authority needs to reflect a different ambition, less in thrall to large commercial interests, but instead be based on quality and value than on quantities of bricks and concrete and more focused on people and quality of life.

Observation:

To what extent does the community actually have a say in its vision – if the Council wants one vision but the community another, who and how would this discrepancy be discussed and aligned?

High level of importance and investment must be attached to cycleways. Most are keen to cycle but are put off by lack of a safe cycle way.

With an ageing population and lack of affordable homes the emphasis on new builds should be addressing these needs. Provision of homes for people who live and work in the area should take preference over second homes.

Imperative that development is sustainable in terms of water use and should not compromise essential water uses such as farming. If necessary tougher restrictions on non essential water use should be implemented.

Increased housing inevitably leads to increased traffic and congestion. Ever increasing numbers of cars is simply not sustainable.

SCDC should not be ambitious; rather they should be considered and steady in their approach to economic development.

A positive action to increase walking, cycling and bus use would be to ensure developments have safe ways to reach at least three footpaths or bridleways. Suffolk Coastal District Council need to act in partnership with Suffolk County Council to encourage active ageing, walking and cycling.

No surprise that youngsters are seeking adventure outside of the safe and secure district. Incomers to fill vacancies should be welcome.

Overall number of proposed housing is too high, no analysis of what the previous Local Plan was meant to achieve and what it actually achieved. Falling birth rates and net inwards migration to Suffolk will mean that new homes will be purchased by retired people which will result in Suffolk having an even older population which will be damaging to the local economy.

Do not consider this to be a true consultation as the preferred outcome seems to have already been decided predicated on a major urban expansion to Felixstowe with no other options explored. Such a massive expansion is highly controversial and the negatives do not outweigh the positives.

Paragraph 1.24 correctly states that tourism is a key contributor to the local economy. Relocating Felixstowe sports centre to an edge of town site would remove much of the vitality of the area.

Some tourist areas have made provision to protect housing for local people. What measures can be taken in Suffolk Coastal to ensure that young people can afford to stay and work in the area without properties being taken up as second homes.

Encouraging independent shops offers diversity and attracts businesses and people in.

A key part of the District's economy is entirely dependent on the unspoilt nature and its diverse wildlife.

The Local Plan should make more provision for small business incubators or hubs which will promote small businesses grow.

An alternative route around Ipswich is needed.

Latest developments in Ferry Road do not comply with the need to preserve the ambience of the local area. The highest need is for bungalows to allow people to downsize into particularly in Old Felixstowe.

The Local Plan must be able to be flexible. It must be able to respond effectively to unforeseen changes, such as climate change, demographic shifts, Brexit, changes to national economy and impact of technology.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The Introduction section of the Final Draft Local Plan has been amended to provide more detail about the context of the District and this includes clarification and consistency of statistics with other sections of the document. Where appropriate the table of Key Issues have been amended accordingly.

The Final Draft Plan also includes further reference on the creation of East Suffolk Council and how this document will be used and implemented following the transition from Suffolk Coastal District Council to a new Council.

It is considered appropriate to use the population figures from the Census as these are a complete and comprehensive record. If the Local Plan was to use the projections for the electoral wards in 2023, these figures may be subject to change and would not provide a robust position to make decisions from.

Further reference has been included within the section to identify the District as an area of "serious" water stress as well as highlighting the network of Public Rights of Way and their ability to encourage walking and cycling opportunities.

Responses received in respect of the level of growth planned for, the location of this and the economic opportunities presented by employment in the District are covered in specific chapters and sections of the Final Draft Local Plan. The tourism chapter has been amended to reflect the role of caravan and holiday parks across the District

A new policy SCLP10.3 Environmental Quality has been added to the Local Plan to consider Environmental Quality across the District.

## Key Issues

Total comments	Support	Object	Observation
17	3	3	11

### Statutory Consultees

RSPB: The reference to Biodiversity should read “need to ensure that areas of biodiversity value are protected and enhanced” as this would be more consistent with other statements in the table and accord with the National Planning Policy Framework.

Historic England agree that the high number of heritage assets is a key issues, but would note that it is not just the quantity of the heritage assets but the overall quality of the historic environment which is important.

Suffolk County Council highlight that the Public Rights of Way play an important role in supporting the development of sustainable communities. Suggest additional wording is added as new paragraph “The District has a significant network of public rights of way, including nationally promoted walking trails such as the Stour and Orwell Walk, and the Sandlings Walk. Public rights of way not only act as walking and cycling links between communities, education sites and workplaces, but also contribute to the economic prosperity of the District through the tourist trade that they attract.”

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council are not clear what methodologies have been used to examine the casual basis and/or explore the correlation landscape between and across the key issues. Should be expressed in cost benefit terms for transparency, monitoring and performance management.

Bawdsey Parish Council have concerns that the plan does not recognise the fine balance between housing and importance of tourism. Encouraging tourism and additional housing if not done carefully and appropriately can damage the Suffolk Coastal area rather than enhancing it. The Key Issues table should recognise that:

- Young people are leaving and the population generally older,
- Need for Further Education opportunities,
- Ensuring an adequate water supply is crucial
- Greater emphasis is needed on the lack of public transport opportunities, especially for those less mobile.

Aldringham-cum-Thorpe Parish Council are pleased to see that comments from the Issues and Options have been taken on board. But question if the policy of housing growth is the right approach in a district which seems more deaths than births. Parish Council pleased to see the plan recognises limited health care provision in rural area and the reliance on the motor car. Plan also recognises the rural and coastal landscape and promotes policies which respond to sea level rise, coastal erosion and encourage high quality design which respects local character.

### **Other organisations**

Westover Landscape Ltd highlight the need for a green infrastructure strategy to be provided by Core Strategy Policy SP17. Why has this been dropped from the emerging policies?

Save Felixstowe Countryside object to the statement that “limited employment land availability within limited large business unit provision outside Felixstowe” as putting a large business unit on a peninsula does not make good sense from an employment perspective.

### **Developers/Landowners**

The Seckford Foundation supports the work of the County Council in regard to options for routes to the north of Ipswich and welcomes this clear and unequivocal expression of support by the District Council.

Scott Properties consider that the evidence base used to generate the quantum of specialist and older people’s housing required over the plan period is inaccurate and understates the actual requirement. Policies are not based on accurate evidence and therefore do not contain adequate provision and flexibility to ensure that accommodation meets the needs of an ageing population and delivered in appropriate locations.

### **Members of the Public**

Support:

None received

Object:

Plonking large scale developments next to areas that can’t offer the infrastructure is not what anyone wants. The best new developments is in or very close to larger towns where there are jobs and much better transport links. Concentrate on making Ipswich a growth hub and put smaller amounts (50 dwellings) attached to villages around the county.

Care workers cannot afford to live nearby their place of work and therefore must drive due to lack of affordable housing.

What does “managing development whilst protecting significant areas of environmental protection” mean. By advocating development of the Layers in Saxmundham, the Council is in fact not protecting significant areas of environmental importance.

The Key Issues identified are the reasons why you should not build to the levels being proposed for the Felixstowe Peninsula. The area needs tourists and tourists need open landscape, good road infrastructure and avoid urban sprawl.

Observation:

Suspect that much of the tourism economy is down to local spending from retirees who have plenty of time and money to enjoy the richness of the area. Focus should be more on leisure building to attract more spending from wealthy retirees.

Believe people would be prepared to pay higher taxes especially in a better off area to provide more facilities. Ipswich Hospital needs some relief and the time is to act now.

Building more bungalows instead of 2&3 storey homes in rural idyllic area would be an improvement as well as increasing council tax on second homes.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Key Issues have been established through public consultation and the role of the Sustainability Appraisal. Although consultation responses have suggested amendments, the issues identified broadly reflect the comments received at earlier stages of the plan making process or the evidence base which supports the Local Plan.

The Key Issues table of the Final Draft Local Plan has been amended to include reference to areas of biodiversity value as outlined by the RSPB.

Wording suggested by Suffolk County Council has been inserted to an earlier part of the Introduction and issues in respect of public transport, employment opportunities, homes for older persons, provision of community infrastructure and green infrastructure are addressed within topic based sections of the Final Draft Local Plan.

## District-wide Statistics

Total comments	Support	Object	Observation
5	1	2	2

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Support:

None received

Object:

There is no data to warrant the ridiculous disproportionate amount of development on the Felixstowe Peninsula.

If there are 61,157 homes and a population of 127,836 in the District that is 2.09 people per home. How can this area possibly need thousands more homes?

Observation:

Please provide proof of how East Suffolk Council will “give greater value for money”. Bigger is not always better.

It would also be helpful to have a time table for the production of a Local Plan to serve East Suffolk Council.

**How these comments have been taken into account in the Final Draft Local Plan:**

Limited number of comments received to this section.

Details of how East Suffolk Council will support the local communities across the District is provided throughout the final document. At this stage there is no timeline for the production of a Local Plan to be prepared by East Suffolk Council, this will be a matter for the new council to consider in due course.

Housing numbers in the Final Draft Plan are covered under chapter 5, but figures are derived from Government standard methodology and the spatial distribution of growth has been formulated through consultation responses and opportunities that are present in the District over the plan period.

## What is the Local Plan?

Total comments	Support	Object	Observation
33	9	13	11

### Statutory Consultees

The Marine Management Organisation is pleased to see reference to the East Inshore and Offshore Marine Plans. It would be good if there was also reference to the Marine Management Organisation in relation to the East Marine Plans.

### Parish and Town Councils

Ufford Parish Council wish to thank all involved for the excellent way the consultation has been administered. Timely and appropriate communications have been welcomed and all SCDC personnel have been extremely helpful and obliging whenever queries have been made to them.

Tunstall Parish Council welcome the review of the plan as this indicates the plan is up to date. Document is well laid out and communications have been excellent and have allowed for onward communication of the plan to residents in a timely manner.

Kelsale-cum-Carlton Parish Council outline that the plan has the feel of a swanky marketing hyperbole, rather than a powerful and galvanising business like vision.

Sudbourne Parish Council have been impressed by the efficiency of the process and with the openness and willingness to meet and engage with local groups shown by the officers managing the review.

Aldringham-cum-Thorpe Parish Council outline that reference made to the use of Neighbourhood Plans in determining local considerations in specific policies is also very helpful in the development of the Neighbourhood Plan for their parish.

### Other organisations

Suffolk Constabulary request that paragraph 1.44 and Table 12.1 are updated to reflect the current status of the Martlesham Neighbourhood Plan. Settlement boundaries should also be included for areas with Neighbourhood Plans since the settlement boundary is a strategic policy.

Westover Landscapes highlight that one key designation has been removed in respect of impact on landscape character. It is not clear what is meant by necessary mitigation.

East Suffolk Liberal Democrats outline there appears to be significant inconsistency in the extent to which Parish Councils are being engaged and consulted with. In some areas Neighbourhood Plans have been respected as part of the development plan (Framlingham), whilst in other areas (Saxmundham) the views of the local community have been ignored. We suggest the Council must listen closely to the views of the Parish Council in planning decisions.

## Developers/Landowners

Alterra Farms outline that given the increased requirement for employment and housing growth, all Neighbourhood Plans should be viewed as out of date if they are not reviewed within 12 months of the Final Draft Local Plan being submitted. If the Neighbourhood Plans are not reviewed they risk not being able to benefit from increased investment in infrastructure, employment and housing growth going forward.

Grainger plc outlines that the draft plan is not seeking to address any unmet need within the Ipswich Strategic Planning Area because it is not known. The Plan will have to be updated once the needs of other authorities, particularly Ipswich become clearer setting aside forthcoming housing figures to be published by the Government.

## Members of the Public

Support:

None received

Object:

Ramifications of the draft local plan for residents of Saxmundham and Benhall are far reaching. Consultation during the summer has left people disillusioned and people have little faith in their power as citizens to shape the places where they live.

If there are 61,157 homes in Suffolk Coastal and the population is 127,836 that is 2.09 people per home how can this area possibly need thousands more homes.

If the area has severe water stress, how can you justify building thousands more homes which all need water?

I do not think the new council is a good idea because the whole area is so diverse. Bigger is not always better.

Disproportionate amount of development on the Felixstowe Peninsula is not warranted, but has been prepared by the far too close and comfortable relationship between Trinity College and the Council. Planning data needs reviewing in the light of Brexit.

Local authorities are not listening to local communities. Infrastructure additions are added to locations before consultations take place with the local communities.

Duty to co-operate and work with local communities does not mean "impose visions" upon them regardless of concerns. Local parish councils have not done enough to inform and engage with local communities on Neighbourhood Plans.

Developments on the Felixstowe Peninsula fail wholeheartedly to relate the social, economic and environmental issues with appropriate planning.

**Observation:**

What is wrong with sending letters out to everyone on the community putting them plainly in the picture? Not everybody has time to trawl through websites or looks at notice boards. Many people do not have access to Facebook or Twitter and residents ought to be informed of what is happening.

Positive and ongoing cooperation with Suffolk County Council over highways, parking and waste collection is challenging and time consuming but is vital if our environment is to be enhanced.

HRA should help to conserve the natural environment; it should be ascertained in each case if a risk of threat of harm comes from human access and pollution caused by cars.

Reference should also be made to “dying” in East Suffolk; this should be planned for by councils as well as individuals and families.

It is quite unreasonable to only promote and accept comments via social media, email and online – residents affected should receive a letter from the Council.

A timeline should be provided in paragraph 1.35, especially if this might shorten the life or significance of this Local Plan.

The consultation via the website is more user friendly than it used to be. However it is inappropriate to make “support” the default choice for representations as this is quite easy to miss.

It is not clear what happens with inconsistencies and contradictions between the Local Plan and Business Plan – which one is more powerful and overrules the other?

More opportunity to engage and advertising should be given to allow the whole community to be aware of the Local Plan.

Conduct of the drop in at Kirton was not appropriate. Staff displayed a degree of indifference and pre determination that rendered the meeting useless. Maps were inaccurate and there was an absence of feedback forms.

Plan is too complicated for any ordinary person to get their head around.

Cannot perceive how the general public are expected to read, understand and interpret over 2,500 pages of information and make informed decision on the proposed developments details. The information is by no means accessible or digestible and should be regarded as an inappropriate way of tendering public opinion.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan acknowledges the role of the Marine Management Organisation and Marine Plans. References to Neighbourhood Plans have also been reviewed and presented accordingly. Where Neighbourhood Plans have been “made” or are at an advanced stage, the details of these have been respected within the Final Draft Plan. However, where communities are at an early stage of developing their Neighbourhood Plan indicative housing numbers have been provided. These indicative housing numbers are required by the National Planning Policy

Framework and ensures best practice within the Final Draft Plan.

The section has been updated to reflect the progress made by the Council on the Local Plan as well as further clarification as to how the Plan will be monitored and delivered.

The Final Draft Plan will be subject to a publication period to invite representations on soundness. The Council will ensure that the Final Draft Plan is published in accordance with the Statement of Community Involvement and advertised in a variety of ways to encourage increased community participation.

## 2 Wider Strategic Planning Area

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

Total comments	Support	Object	Observation
19	3	6	10

#### Statutory Consultees

Ipswich Borough Council highlight that it is vital Ipswich Borough and Suffolk Coastal District councils continue to work together to ensure delivery of housing, employment and supporting infrastructure. Ipswich Borough Council fully endorses the provisions and aims that are set out in Policy SCLP2.1.

#### Parish and Town Councils

Tunstall Parish Council welcome the creation of the Ipswich Strategic Planning Area. This will encourage planning for a much wider area and allow authorities broader scope when allocating housing and development.

Kelsale-cum-Carlton Parish Council highlight that traffic going south on the A12 towards Ipswich will add further congestion at peak periods. This pattern of employment is likely to also direct shopping habits to Martlesham for food and everyday supplies this deepening the traffic problems and reducing Market Town viability further.

Levington & Stratton Hall Parish Council question who is going to live in the new dwellings and where are they going to work and how will they get there? The Local Plan needs more clarity about this.

#### Other organisations

Westover Landscape Ltd welcome the provision of new jobs, however traffic and transport into Ipswich are will need to be significantly improved by more public transport provision and also certainty around the continued use of Martlesham Park and Ride.

Ferry Road Campaign Group outline that the employment growth is unlikely to be achieved.

FCC Environment support the approach outlined in Policy SCLP2.1.

#### Developers/Landowners

Suffolk Constabulary highlight that the housing target in the Local Plan may need to be uplifted to reflect the publication of new household projections in September 2018. Once the final amendments to the Planning Practice Guidance have been made any uplift is fully explained and justified in the Local Plan.

Housing figures in the Plan should reflect the revised standard methodology for calculating housing need. Landform Estates Limited predict an increase in the housing requirement and additional sites

will be required to be assured that proposed new strategic allocations are deliverable in the timeframes outlined.

Ipswich Town Football Club welcome that the authorities across the Ipswich Housing Market Area continue to work together to meet housing need, but highlight that the Inspector's Report for the Ipswich Borough Local Plan (published in January 2017) highlighted the need for authorities to work together. Because of this and changes to methodology resulting from household projection figures released in September 2018, there is uncertainty about housing numbers and if additional sites are required to meet the "unmet" needs of Ipswich Borough.

Churchmanor Estates support the approach in Policy SCLP2.1 in that Suffolk Coastal plays a key role in the economic growth of the wider area and that it will contribute towards the creation of the minimum total jobs growth across the whole of the Functional Economic Area.

Kesgrave Covenant Ltd object to the policy and state that it does not meet the tests of soundness. To be positively prepared the strategy should show that needs of the Ipswich Housing Market Area can be met and that if Ipswich's needs cannot be met consideration should be given to allocations in Suffolk Coastal. To be justified the strategy should follow one of the options put forward at Issues and Options stage and include the allocation of land on the edge of Ipswich. Consideration of the wider Ipswich Housing Market Area would provide a more effective strategy. For these reasons the plan is not considered to be consistent with national policy. Under paragraphs 11 and 26 of the National Planning Policy Framework meeting housing needs from neighbouring areas is integral to plan preparation. If needs for the Ipswich Housing Market Area cannot be met in full, the Ipswich and Suffolk Coastal plans will fail the Duty to Co-operate. Policy SCLP2.1 should be reviewed to enable land at Humber Doucy Lane to come forward for development.

Woolpit Business Parks welcome that authorities within the Ipswich Housing Market Area work together and that the starting point for identifying a housing requirement is the new standard method. The housing need figures to be published by the Ministry of Housing, Communities and Local Government in September 2018 are likely to lead to a significant reduction and that MHCLG will consider adjusting the method and will be holding a consultation on the details of any change, with the aim of ensuring 300,000 homes are built per year. It is unknown whether each authority in the Ipswich Housing Market Area can meet their own needs. It is likely that Suffolk Coastal will need to meet unmet need from Ipswich. There is therefore uncertainty around the standard methodology and whether additional sites will be needed to meet unmet need from Ipswich.

Gladman Developments highlight that Policy SCLP2.1 should go further in respect of the economic growth of Ipswich as a clear priority for the region and the UK. A coordinated approach between local authorities should be fully reflected within the vision, strategy and policies for the Suffolk Coastal Local Plan. Strategic issues covering the Ipswich Strategic Planning Area must be considered in a holistic manner, ensuring that positively prepared local plans are put in place that fully recognise and seek to deliver the long term economic growth potential and associated infrastructure requirements for the Ipswich Strategic Planning Area.

### **Members of the Public**

Support:

None received

**Objection:**

The benefits of housing numbers going above and beyond what is actually required have not been explained to the residents. The housing numbers also do not appear to take any effect of Brexit into account. The only way to meet the needs of the people who require truly affordable housing is for the council to build them for affordable rents. Technology will also mean more jobs are done by machine, so the type of jobs will change not the overall number.

Local Plan should be about the local community deciding what its housing needs are and how these will be delivered, instead of the government imposing housing quotas whether or not they are required or sustainable. There is no evidence to support this level of new housing.

Wholly inappropriate to suggest that development of 800 new houses in Saxmundham matches demand and suitability.

Colneis Peninsular has been thrown to developers and landowners – large areas of unoccupied land on the other side of the River Deben and River Orwell – why have they not been considered? A “Garden Town” built to be self sustaining could work very well.

**Observation:**

Strategy for growth suggests land for 7,220 jobs but only two sites allocated. Not clear where all the jobs are going. Should also be reference to Bentwaters, massive scale site but with urgent need for additional infrastructure and protecting nearby amenity?

Central government has not explained its thinking on calculating housing need in an open and transparent manner.

Another map (page 15 of the First Draft Local Plan) that Kesgrave does not feature on, despite its size – so much for a separate community identity.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan has been updated to reflect the findings of the Government’s standard methodology for housing need across the District as well as providing additional justification and background to these numbers. These updated figures inform the strategy for the District in the context of the wider area including neighbouring authorities.

The Council has continued to work with neighbouring authorities through the Ipswich Strategic Planning Area (ISPA) and the result of this work is seen in the Statement of Common Ground that has been prepared and published. The Statement of Common Ground outlines the cross boundary strategic issues and partnership working that is taking place to fulfil requirements under the Duty to Co-operate for plan making and it is not envisaged that Suffolk Coastal will need to address any unmet housing need from other local authorities.

To inform the Final Draft Local Plan the Council has undertaken transport modelling (in partnership with neighbouring authorities and Suffolk County Council). The conclusions of this

modelling have been included within appropriate sections of the Final Draft Plan and the Infrastructure Framework. Evidence has also been prepared for employment needs across the District and the Final Draft Plan outlines an ambitious vision to promote economic prosperity over the plan period. Further information on the economic aspects of the Final Draft Plan can be found in chapter 4.

## Policy SCLP2.2 Strategic Infrastructure Priorities

Total comments	Support	Object	Observation
31	6	5	20

### Statutory Consultees

Suffolk County Council suggest that Policy SCLP2.2 should include reference to walking as well as cycling to promote rights of way as well as reflecting the strategic role of walking as a sustainable and healthy mode of transport.

Suffolk County Council support the specific transport schemes in Policy SCLP2.2 but promotion of sustainable travel should be a strategic priority for transport. Suffolk County Council submitted an Outline Business Case for the Suffolk Energy Gateway scheme which would support long term growth in East Suffolk.

Suffolk County Council highlight that appropriate waste infrastructure is essential and facilities are provided across Suffolk to serve the population. In respect of Household Waste Recycling Sites in Suffolk Coastal:

- Leiston requires further provision to meet the additional demand on the site and contributions will be sought for upgrading and improvements over the plan period.
- Foxhall is over capacity and projects are underway to expand the existing site and it is imperative that funding is forthcoming from development to improve this facility.
- Felixstowe is expected to see around 30% more throughput on this site due to development in the area will require funding to accommodate this expansion.

### Parish and Town Councils

Tunstall Parish Council feels as though Policy SCLP2.2 should go much further in relation to Broadband provision. A commitment to provide every household in the District with broadband download speeds of at least 50Mbps should be stated.

Kelsale-cum-Carlton Parish Council highlight that is it ironic that the District Council hosting the UK's 2<sup>nd</sup> largest telecoms group has been unable to work collaboratively to capitalise on the skills, technology, research development capabilities on the doorstep. Is the emergent strategy implied by these priorities truly sustainable and destined to deliver economic, environmental, health and quality of life ambitions in the Plan.

Felixstowe Town Council supports Policy SCLP2.2, but additional consideration should be given to upgrade of Seven Hills and Foxhall roundabouts, widening Candlet Road, improving sewerage capacity, upgrading electricity supply, sustainable links to/from Felixstowe across the Deben and Orwell and comprehensive high quality digital services.

Aldeburgh Town Council states that the provision of affordable, fast broadband is important for businesses and residents alike.

Sudbourne Parish Council very much regret that the desperate lack of public transport and the impact of that lack on environmentally friendly tourism, job development and the sustainability of smaller local communities is not stressed in this section.

Framlingham Town Council suggest that Policy SCLP2.2 includes bus transport as a strategic priority with additional wording to read “Increased availability of bus services in rural areas to provide transport to and from major towns and transport links both for work and Friday/Saturday evening leisure”.

Aldringham-cum-Thorpe Parish Council fully support policy SCLP2.2 which should be a prerequisite to any expansion because without infrastructure housing and employment provision the will be unsustainable.

Marlesford Parish Council comment that huge increase in traffic and air and noise pollution is the biggest problem in the village. Parishioners are grateful that SCDC and Suffolk County Council support the early construction of the four villages bypass, which will remove the need to construct a 24 hours park and ride overlooking the village. There should be firm plans for infrastructure improvements linked to each proposed development. Proposed development SCLP12.56 adjacent to Wickham Market should involve new slip roads onto the A12 southbound to reduce traffic through Wickham Market, Melton and Ufford.

Levington and Stratton Hall Parish Council welcome the reference to an Ipswich Northern bypass, but the section seems light on detail as to how this will be delivered. Disappointing not to see any solution to reducing increased demand on the Orwell Bridge which is at capacity.

Little Bealings Parish Council comment that they are aware of County Council proposals for an Ipswich Northern Bypass to run along a corridor between Kesgrave and Grundisburgh and considers this a major threat to the quality of life in the village to be vigorously opposed. A northern link road route should focus on a corridor further north, linking the A14 at Claydon to the A12 at Wickham Market.

### **Other organisations**

Westover Landscape Ltd provide mainly observations and recommendations.

Suffolk Constabulary suggests that reference is made to them within Policy SCLP2.2 as well as additional policy criteria relating to “appropriate community safety and cohesion provision to meet needs resulting from growth.”

Anglian Water suggest that Policy SCLP2.2(i) is amended to read “Improvements to water supply, foul sewerage and sewage treatment capacity; and”

Department for Education welcome reference to the Council working with partners including Suffolk County Council in Policy SCLP2.2

## Developers/Landowners

Strutt & Parker on behalf of Suffolk Coastal District Council outline that whilst the policy clearly recognises the need to deliver key infrastructure projects such as road, rail, education. Leisure provision needs to be identified as a key strategic infrastructure priority as part of this draft policy. The draft plan needs to recognise the importance of delivering leisure infrastructure over the plan period to help sustain and promote the vitality of the District in terms of healthy living, recreation and tourism.

Pigeon Capital Management Ltd & Trustees of Limes and Grange Farms outline that Policy SCLP2.2 recognises some key infrastructure cannot be considered by district in isolation and that cross boundary working will help achieve improvements to the A14 and increased capacity of railway lines. Responsibilities and timings need to be agreed between relevant authorities to enable the District to robustly demonstrate the Plan is deliverable.

Churchmanor Estates welcome Policy SCLP2.2 but it would be desirable for the plan to provide more detail on which improvements to the A12 and the A14 are to be subject of the Council's engagement to secure their "timely delivery". This would assist the development industry in understanding the Council's priorities and reasoning.

Gladman outline that it is important for the Local Plan to support a strong and competitive economy. The strategy should positively seek to address potential barriers to investment such as inadequate infrastructure and services.

The Seckford Foundation support paragraph 2.17 and state that they support the work of the County Council in this regard and welcomes the clear expression of support by the District Council. They support the statement that the next review of the Local Plan will examine options for future growth that might be facilitated or enabled by the new road.

Persimmon Homes welcome the continued involvement of Suffolk Coastal District Council in the Ipswich Strategic Planning Area and the statement that the authorities will revisit the housing numbers when the 2016-based household projections are published in September 2018. The Ministry of Housing, Communities and Local Government will not produce these figures and Councils will need to undertake the calculation. 2016 should be the base date for the Plan as the projections will be based in 2016. It is likely that the housing need figure for Suffolk Coastal will be greater than 509. The shortfall could be met by allocation in Kesgrave. The standard method does not allow for vacancies and second homes and the Council should consider the extent to which the requirement should be increased to address this. It should not be assumed that a 10% uplift will address this. It is unfortunate that minutes of more recent Ipswich Strategic Planning Area Board meetings have not been published. Meeting the unmet needs of Ipswich is a key issue that the Ipswich Strategic Planning Area authorities must address.

## Members of the Public

Support

None received

## Objection

Object to any further development in areas where no sufficient infrastructure to cope with increase of homes/population/traffic. Such as the Deben Peninsular and areas such as Rendlesham and Bentwaters. Witnessed huge increase in traffic on rural roads not designed to carry the size and level of such vehicles. Any developments in these area require availability of cars, due to lack of appropriate public transport which is not sustainable in this day and age.

Suffolk is suffering from too many “fake fibres” initiatives relying on copper, wireless, radio and satellite. What is needed is a future proofed “fibre to premises” project.

Infrastructure to come first...development after!

The adverse impacts of previous growth at Kesgrave should be recognised. The A1214 suffers from significant traffic congestion, which adds to local air pollution. There are problems of flooding at the junction of Bell Lane and the A1214. Bell Lane does not have capacity for more vehicles. Foxhall Road has limited capacity for increased traffic. There are safety issues at the Foxhall Road / Bell Lane junction. Minor roads now have queues at peak times. Emergency services response times are jeopardised. There is no railway station in Kesgrave. Brightwell Lakes will generate more traffic. The northern routes investigation should consider increasing passenger rail services including new rail stations between Westerfield and Woodbridge. There should be no more growth along the A12, high growth here would affect the assets that tourists visit East Suffolk for.

## Observation

Proposed major expansion of Felixstowe would bring the urban area to the boundary of the AONB. This is an important buffer between the town and AONB which provides many opportunities to access the countryside.

It would be better to spend money on basic road repairs on existing roads before construction of new roads. Many cycle lanes are unsafe resulting in cyclists using the roads.

High quality digital communications need to be available to help areas thrive. An alternative River Orwell crossing is essential. Cycleways linking areas are needed and need to come first to ensure health and well being of society. Bus and train routes need to be improved frequent and reliable.

If there is an improvement in infrastructure this will change the balance in demand for housing near to Ipswich due to employment opportunities. Improvements to the A12 north of Ipswich will cause problems in feeder roads. Increase local employment opportunities as opposed to employment in Ipswich / Felixstowe / Adastral Park might mean greater flexibility in the rural areas.

Consideration should be given to example of cycling infrastructure in The Netherlands, where cycles are used for everyday use. Electric bikes are becoming more commonplace. The advantages are no congestion, no need for car parks, revitalised town centres, safe journeys to school, less pollution and health improvements.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan has been updated to reflect the need to also reference walking as highlighted by Suffolk County Council as well as wording suggested by Anglian Water and Suffolk Constabulary. Other specific infrastructure requests have been identified within the Infrastructure Framework contained within the Appendices to the plan. At this stage, it is not possible to provide further detail about many of these strategic projects, but the policy outlines the Council's support in principal for the delivery of these over the plan period in partnership with a variety of relevant stakeholders. Over the plan period, the policy will be used to support strategic infrastructure projects as they come forward to delivery.

Reference is retained to digital telecommunications within this policy. Further requirements in respect of digital telecommunications is contained with Policy SCLP8.4 Digital Infrastructure.

Area specific infrastructure requirements are outlined with the site allocations or area specific strategies found in chapter 12 of the Final Draft Local Plan. Further details are also provided where relevant in the Infrastructure Framework which support the plan.

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

Total comments	Support	Object	Observation
9	4	2	3

### Statutory Consultees

Natural England supports the considerable positive work by the local authorities in the Ipswich Strategic Planning Area. Applaud the authorities' forward thinking and collaborative approach in respect of Recreational Avoidance Mitigation and support Policy SCLP2.3.

### Parish and Town Councils

Tunstall Parish Council strongly welcomes Policy SCLP2.3

### Other organisations

RSPB welcomes the commitment in Policy SCLP2.3 to cross boundary working regarding the Recreational Avoidance and Mitigation Strategy and look forward to seeing this as a formalised Supplementary Planning Document. RSPB concerned as to the possible implication of recent case law on status of the Strategy. Recommend that Council follows the approach taken by Great Yarmouth who have included a policy on Recreational Avoidance and Mitigation Strategy within their Local Plan.

Suffolk County Council AONB Team supports the work on the Suffolk Recreational Avoidance and Mitigation Strategy to help mitigate the impact of increased recreational pressures arising from new residential growth proposed in the Ipswich Strategic Planning Area.

Suffolk Wildlife Trust support the approach in Policy SCLP2.3 to ensure that impacts on internationally important nature conservation sites are addressed across administrative boundaries.

### Developers/Landowners

Gladman note that the Council intend to work with neighbouring authorities. At the moment the policy reads as a statement of intent rather than a clear policy as to how these issues will be addresses. It will be important that any implications from the Supplementary Planning Document are fully considered within the plan making process and costs built into the Plan's viability assessment.

### Members of the Public

Support:

None received

**Objection:**

No protection of the environment has been shown in proposing to build on the Layers in Saxmundham which is a site rich in flora and fauna and used by the whole of Saxmundham and Benhall on a daily basis.

You can't keep on mitigating against protected habitats. These areas are too sensitive and already endangered due to over-development and the endless dredging in Felixstowe and the impact this has on wading birds in the estuaries. Please do not attempt to fool yourselves that Sizewell C won't go a long way to trashing these precious environments.

The Suffolk AONB is probably the most widely known environment which needs protection. There is particular concern at proposals to develop land north of Felixstowe. Intensive development, in particular the light-spill at night will inevitably affect the integrity of the AONB.

**Observation:**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

No changes are considered necessary as a result of the comments.

Comments received in respect of site specific issues are addressed through individual policies in other sections of the Local Plan.

## 3 Suffolk Coastal Spatial Strategy

### Vision for Suffolk Coastal

Total comments	Support	Object	Observation
19	5	2	12

#### Statutory Consultees

Historic England welcomes the commitment to maintain the distinctive character and role of the variety of settlements in Suffolk Coastal. Recommend using the phrase “natural, built and historic environment.”

Suffolk County Council encourage a policy framework for assessing the impacts of development on human health and highlight the opportunity for Health Impact Assessments in the planning system to be included within the Local Plan.

#### Parish and Town Councils

Tunstall Parish Council fully supports the vision for the District. Tunstall are embarking on a project to increase sports provision within the village and welcome that this is in line with the Local Plan vision.

Kelsale-cum-Carlton outline that the vision raises fundamental issue of linking actions directly to outcomes and is particularly unclear. One is left with the feeling that the plan only deals with facilitative and supportive policy statements, something that surely cannot be the case and should include more detail, ownership and accountabilities.

Sudbourne Parish Council highlight that the modern built environment does not share the quality of the natural environment. It is absolutely essential that the high ideals expressed in the launch of the Suffolk Design Guide are actually delivered. Good, bold modern architecture should be encouraged and low quality pastiche challenged and refused.

Sudbourne Parish Council will encourage residents through a Neighbourhood Plan to ensure that the planning authority is held to account for maintaining balance between significant growth, high quality design and sensitivity of environment and heritage assets.

Bawdsey Parish Council suggests a number of wording changes to the vision.

Peasenhall Parish Council have difficult in seeing how their community can plan for its future as outlined in the Vision when it is classified as a small village and a tight settlement boundary proposed.

Aldringham-cum-Thorpe Parish Council fully supports the vision outlined in the First Draft Local Plan.

## Other organisations

Ferry Road Campaign Group consider that the vision is inconsistent with the plans for development in Felixstowe and the Trimleys and that it places a disproportionate amount of housing in Felixstowe.

East Suffolk Liberal Democrats welcome the vision in the Local Plan but raise questions based on the principles of sustainability and community (key Liberal Democrat values). In particular would like to see development encouraged that supports high streets and works for key sectors of the local economy. District Council needs to look at what is best for the area and communities, rather than what is profitable for developers. The Local Plan should also promote affordability agenda in housing to make effective use of planning gains for the local community. Local Plan also presents an opportunity to improve opportunity for young people, tackle pockets of deprivation and be environmentally sensitive in a master planned way that protects what is special about Suffolk Coastal.

## Developers/Landowners

FCC Environment supports the vision for Suffolk Coastal, in particular the second paragraph.

Churchmanor Estates support the proposed vision and its focus on “a diverse, strong and prosperous economy.”

Gladman note the vision paints a positive picture in relation to the ambitions of the Suffolk Coastal District over the Plan Period. Specific recognition should also be given within the Vision to the ‘wider than local issues’ that will need to be addressed during the plan period, in particular, the role that Suffolk Coastal must play in enabling the delivery of the economic potential of Ipswich over the plan period and beyond.

## Members of the Public

District Councillors

Councillor Christine Block comments that the vision is a disappointing reflection on the future of the District and that reference to the natural environment, which is of national significance, is limited.

Support:

None received

Objection:

Feels as though the plan is designed to confuse people in order to discourage people from responding. Lots of contradictions in the Plan, such as Saxmundham is a thriving market town but later stating it has employment issues. How can everything in Suffolk Coastal be healthy when you are supporting the proposed Nuclear Power Station, a massive house building exercise and on sites which are environmentally sensitive. Concern about building on the Layers in Saxmundham, plan not based on the environment and sustainability, building the four villages bypass totally disregards the environmentally sensitive land, lack of affordable homes, no focus on public transport.

Observation:

Important that the vision is based on what is known and not on assumptions. Creating new housing does not create new jobs nor does it improve roads. Danger that the area will become a commuter base which is not desirable for the environment given the current rail links.

Consider that the same weight and focus should be given to the provision of infrastructure to support the level of housing development in the Local Plan. Approach that should be adopted is to provide the necessary infrastructure before housing development takes place rather than the current practice of building homes and then hoping that the infrastructure is developed.

**How these comments have been taken into account in the Final Draft Local Plan:**

The vision has been amended to reflect some of the responses to the First Draft Local Plan. It has been reworded in part to provide a more positive approach and outline the progress that is anticipated to be made by 2036. Minor wording changes have been included where necessary to improve the clarity of the vision.

Many of the comments received are addressed indirectly through the topic based criteria policies and site allocations found in other sections of the Final Draft Local Plan, such as the need for appropriate infrastructure to be delivered in a timely manner and the justification for the Garden Neighbourhoods at Felixstowe and Saxmundham.

## Strategic Priorities and Objectives

Total comments	Support	Object	Observation
9	1	3	5

### Statutory Consultees

Historic England welcomes the strategic priority to “enhance the natural, built and historic environment and provide accessible green infrastructure and public open spaces. Note that Policy SCLP11.1 has not been included in Table 3.1 and would recommend the inclusion of this policy against the strategic priority.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council highlight that the Strategic Objectives fail to provide the reader with an understanding of what differentiates an Objective from a Strategic Priority. Taking this simple step would provide all participants with a tangible understanding of “What success looks like” and “progress made”.

Sudbourne Parish Council highlight that East Suffolk Council must demonstrate that it has the skills and resources to support the intention to promote high quality design across the District and challenge poor design.

### Other organisations

Suffolk Constabulary request that a more realistic housing delivery is applied to the housing trajectory. Also requested that the Suffolk Constabulary Headquarters is identified as residential opportunity to maintain a deliverable housing land supply.

Suffolk Constabulary suggest wording change to Table 3.1 to include “safe”

Westover Landscape Limited highlight that PolicySCLP5.7 is omitted from the contents list.

### Developers/Landowners

None received

### Members of the Public

Support

None received

Object

Benhall and Sternfield is under siege from multiple proposals in an uncoordinated approach that does not join up policy and ignores the knock on effect and interrelated results of the proposals (EDF and Sizewell, Garden Neighbourhood, Friston Substation and Benhall being categorised as it if were a Local Service Centre and potential allocation).

There is no way that the current proposals for north Felixstowe protect, maintain or enhance the adjacent Area of Outstanding Natural Beauty.

#### Observation

Kesgrave is already short of green space and playing fields which makes it even more important that the setting and benefits of Long Stropps should not be impaired by any further development nearby as this would effectively deter residents from pursuing healthy and active open air pursuits.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Plan has been amended to identify Strategic Priorities only. The Strategic Priorities in the Final Draft Local Plan have been amended based on responses where relevant, such as those from Suffolk Constabulary or to reflect the revised housing and job targets in accordance with other policies.

Policy numbers have been revised to reflect the Final Draft Local Plan and those omitted previously have been incorporated to ensure completeness.

No other changes have been made to this part of the Final Draft Plan as area specific issues raised during the consultation are addressed through area specific strategies.

## Policy SCLP3.1 Presumption in favour of sustainable development

Total comments	Support	Object	Observation
14	2	7	5

### Statutory Consultees

Historic England note that the footnote within the First Draft Local Plan now should relate to National Planning Policy Framework paragraph 11(b)(i).

### Parish and Town Councils

Felixstowe Town Council supports Policy SCLP3.1.

Sudbourne Parish Council insist that where questions of sustainability are raised in a local context, the planners are held to the letter's of the National Planning Policy Framework policies.

Bawdsey Parish Council question if the District Council's policies are up to date to deal with issues raised under paragraph 3.6.

### Other organisations

Ferry Road Campaign Group outline that insufficient attention has already been given in planning actions in Felixstowe and protection of the Area of Outstanding Natural Beauty. It is likely that this will continue without a change in attitude at Suffolk Coastal District Council.

### Developers/Landowners

Ipswich Town Football Club outline that Policy SCLP3.1 is not wholly consistent with the revised NPPF paragraph 11. NPPF paragraph 11 makes no reference to "where possible" or "unless material considerations indicate otherwise" and therefore these references should be removed. NPPF paragraph 11 does not make any reference to exceptions where the proposal would undermine the achievement of the vision and objectives set out in the Local Plan.

E R Winter & Son consider that Policy SCLP3.1 is in line with paragraph 11 of the NPPF and as such is appropriate.

Woolpit Business Parks Limited do not consider the policy to be wholly consistent with the NPPF paragraph 11. Policy SCLP3.1 should be updated to reflect the NPPF in full.

### Members of the Public

Support:

None received

Objection:

Planning should never be presumed as accepted, there should always be consultation. How can building on farmland be acceptable when we need to grow food in order to eat?

A lot of building sites have been left empty and derelict and are not coming forward for development so why identify further sites. Existing farm land that has been given permission should be built on instead of land banking. People should only be able to have houses as their primary residency, where there is a shortage of housing; new builds should not be sold to people who are not a primary resident of the area. Green field development should be the last option.

Demand for new homes in SCDC is not driven by the communities, but those wishing to move to the communities. The Garden Village would effectively link the small village of Benhall Green and Sternfield to the “sprawl” of Saxmundham. SCDC must ensure that infrastructure in the form of roads, medical, schools etc is in place ahead of building works.

Observation:

The presumption in favour of sustainable development should only be that – if there is clear evidence that a development is unsustainable, then the presumption should clearly not be valid.

Paragraph numbers and footnote references to the NPPF have changed following the publication of the revised NPPF in 2018.

The Local Plan needs to be more explicit that it is for those seeking to gain planning consent for development to evidence and illustrate their proposals are sustainable development within the local context. Proposed development that would fundamentally and negatively impact on the character of communities or lead to coalescence of communities is rightly not acceptable.

- Local Plan should clearly state development provide evidence on how they will impact services.
- Local Plan should state where a proposed development would fundamentally impact on character of communities will not be regarded as sustainable development.
- The Council should consider identifying de minimus level for applicants to provide detailed evidence of whether their proposed development is sustainable development.
- The Council should consider additional criteria for applicants to evaluate proposed developments for the impact on the hinterland communities.
- The Council should work with statutory bodies to keep information about capacity of services throughout the area.
- The Council should place legally binding agreements on developers to evaluate whether the proposed development is sustainable or not.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy removed from the Final Draft Plan as experience from recent Local Plan Examinations indicates that following the publication of the revised National Planning Policy Framework in July 2018, there is no requirement for a policy which considers the presumption in favour of sustainable development.

Comments in relation to the needs of communities have been addressed through the spatial strategy, vision for individual areas or site specific policies in other sections of the Final Draft Plan.

## Spatial Strategy and Distribution and Policy SCLP3.2 Strategy for Growth in Suffolk Coastal District

Total comments	Support	Object	Observation
169	16	79	74

### Statutory Consultees

Historic England object to the principles of garden cities as they do not include the historic environment. Reference to the historic environment should be included in paragraph 3.12.

Ipswich Borough Council state that the quantitative needs for convenience retail provision are lower than in the 2017 Retail and Commercial Leisure Study. It is not clear why this is. Paragraph 13.1.4 of the Retail and Commercial Leisure Study states that capacity for the Eastern Ipswich Fringe should be directed to centres first which include Woodbridge, Felixstowe and centres in Ipswich. Clarification is sought to ensure that convenience floorspace requirements are met between the two authorities.

Natural England comment that the strategy presents a range of potential risks for the natural environment, as set out in the Habitats Regulations Screening Assessment. Significant further work is required to explore the detail of these risks, and the potential for mitigation and avoidance, at the Appropriate Assessment stage. Natural England would welcome early and ongoing dialogue on these matters.

Therese Coffey MP objects and states that it is hugely important to recognise the need for new homes and business sites however, this risks changing the nature of Suffolk Coastal from a largely rural area with a variety of small market towns to an urban-focused area with remote villages. Concern about putting undue pressure on the Area of Outstanding Natural Beauty and its fringe east of the A12. Rural villages should be vibrant and thriving, not just dormitories. The amount of greenfield sites is concerning.

### Parish and Town Councils

Tunstall Parish Council understand the need for growth, however provision of appropriate infrastructure must be in place before substantial housing development is built.

Kelsale-cum-Carlton Parish Council observe that paragraph 3.10 is unclear and confusing. It is presumed that it sets out that ambitious housing delivery is led by economic growth which delivers better jobs which enhance prosperity and address affordability. It is not clear what the pump priming mechanism is and what will prevent external interventions such as second home ownership, holiday lets and property speculation. Query whether there is any research to confirm this will occur.

Kelsale-cum-Carlton Parish Council query under paragraph 3.11 whether 'enhanced' means housing development and which 'struggling services and facilities' would justify an intervention.

Kelsale-cum-Carlton Parish Council observe that paragraph 3.15 suggests that road and rail connections are under utilised and query whether this can be evidenced. The second part of the

paragraph, and paragraph 3.35, ignores the impact of second homes and buy to let which will continue without confining purchasers to those with local connections and consideration could be given to the recent experience of sales of new homes in Saxmundham.

Kelsale-cum-Carlton Parish Council query in relation to paragraph 3.17 whether infrastructure will be scaled to meet existing deficits, whether the garden neighbourhood will consider potential traffic impacts if new health capacity is provided in the garden neighbourhood or at Lambsale Meadow.

Kelsale-cum-Carlton Parish Council query under the table 'providing for employment' that as the plan elsewhere indicates that the main employment sectors are likely to be tourism and business and professional services whether it is credible to claim to create 'more and better paid jobs' and to 'enhance prosperity' and 'address housing affordability'. They query whether an assumed employment mix and remuneration gain has been evidenced.

Kelsale-cum-Carlton Parish Council observe that the Plan seeks to deliver more new homes than jobs. This is assumed to either promote commuting or affect affordability. Query which it is and whether it is evidenced.

Kelsale-cum-Carlton Parish Council – Paragraph 3.35 ignores the impact of buy to let, second homes and holiday homes.

Sudbourne Parish Council state that there is no link between the phrase Garden Neighbourhood and the actual plans.

Waldringfield Parish Council support the spatial strategy that recognises that housing need in the East of Ipswich area is being met through Brightwell Lakes.

Felixstowe Town Council support Policy SCLP3.2 subject to greater clarity being provided between the baseline employment land requirement of 13ha and the later statement 'New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe'. The numbering of the policy should not use a-d twice. 3.2(c) should acknowledge a need for a real mix of housing including shared ownership, social and market affordable homes. There should be assurances that infrastructure is delivered ahead or at an early stage of associated development.

Martlesham Parish Council object to paragraph 3.19 should this mean that development would come forward in advance of an Ipswich northern route. Concerned that due to the time taken to build a major road, that congestion should not be created in the meantime.

Bawdsey Parish Council are pleased that the issues in paragraph 3.11 have been acknowledged. In paragraph 3.18 line 3 should states 'by recognising the possibility of higher levels...'. They comment that no rationale has been given for the 10% increase in housing requirement in paragraph 3.31, this should be 2-3%. Paragraph 3.2 should contain reference to affordable housing. Policy SCLP3.2 should also reference the need to protect the environment.

Peasenhall Parish Council comment that a more diverse range of development in suitable villages should be encouraged. Restrictive policies applied to Peasenhall will not enable the village to

contribute to housing choice and suggest the sustainability of other settlements is being sacrificed through creation of Garden Neighbourhoods.

Aldringham-cum-Thorpe Parish council comment that it is essential that the four villages bypass and improved rail links are delivered before further expansion along the A12 as well as to support the construction of Sizewell C and energy infrastructure.

Marlesford Parish Council comment that, in relation to paragraph 3.18, bus services have been cut drastically and local footpaths are poorly maintained. There is a lack of suitable provision for bicycles.

Kirton and Falkenham Parish Council comment that the Council has used obsolete data from the ONS and OECD for housing and employment land estimates. Lower growth figures have subsequently been published.

Westerfield Parish Council consider the One reason given for the over allocation is to ensure more affordable homes are delivered which seems a little illogical as it implies that in order build the necessary affordable homes, other homes that are not required may also have to be built. Clarify whether the contingency is part of the requirement. Brightwell Lakes and the Ipswich Garden Suburb will create 5,500 new dwellings when completed and there is still concern the effect this will have on east west traffic across north Ipswich and additional traffic through villages such as Westerfield. Consequently, we support the decision to restrict any further major growth in this area in the planned period. A Northern Bypass is urgently needed. Have no objection to the housing target and support the spatial strategy.

Levington and Stratton Hall Parish Council comment that there is no clarity on who will live in the houses, where they will work and how they will get there. Whilst some rural areas 'need' development others do not. An approach based on land availability could result in the creation of scattered communities with limited services and increased traffic. There is no evidence of the need to increase housing need by 10% or to allocate more than 13ha of employment land.

Hacheston Parish Council comment that the statement in paragraph 5.17 of the Plan should be incorporated into policy which is used to prevent harm caused by developments such as an EDF SZC Park & Ride, houses being developed too close to a water course, structures being erected which are not in keeping with surrounding dwellings, or developments in areas which currently are protected by Special Landscape considerations. The Parish Council and residents are concerned about unwanted developments, especially those which are not tied to reasonable infrastructure that serves the needs of the community. Residents are concerned that the Council does not consider Hacheston's best interests. There is increasing traffic and speeding which the District and County Council have not been able to address.

Saxmundham Town Council comment that the principles of garden neighbourhoods identified in paragraph 3.12 are not applied in a satisfactory way. A better partnership with the Town Council and community is required. The Garden Neighbourhood proposal for Beccles and Worlingham in the Waveney Local Plan better reflects these principles. The site is twice the size of South Saxmundham yet only has 50% more housing. The details for the Beccles and Worlingham Garden Neighbourhood were more detailed at the same stage of plan making. The Town Council state that it is surprising that little consideration is given to Sizewell C. Sizewell C will present challenges to local infrastructure, facilities and services. The impacts would be greater when combined with the impacts of the Garden Neighbourhood, for example in relation to traffic.

Rushmere St Andrew Parish Council comment that they are pleased to note the proposals in the Plan, and in particular those for the communities neighbouring Ipswich.

### **Other organisations**

Ferry Road Campaign Group identify that some 50% of new housing development across the District will come forward in Felixstowe. It is therefore essential that the need for this is properly justified, understood and endorsed by people of the town through a bottom up rather than imposed from above.

Ferry Road Campaign Group object to the section 'Providing for Employment' as through the global trend for automation employment will decrease, not increase.

Ferry Road Campaign Group object to the disproportionate amount of growth being placed in Felixstowe which is on a peninsula. There is no local need for this and local jobs will not support it. It will result in more commuter traffic.

Westover Landscape Ltd suggest that a policy is needed outlining the principles of garden cities.

Westover Landscape Ltd raise concern over landscape impact of the four villages bypass. It will open up further land for housing and not achieve the stated benefits in traffic reduction on the existing A12. Parking capacity is limited at stations and improvements to rail services are needed before any large scale housing is considered.

Westover Landscape Ltd suggest that, in relation to Felixstowe, reference to landscaping should be included as a key aspect of good infrastructure provision.

FCC Environment support the strategic priorities of the Plan in particular the policy 'To achieve diverse and prosperous economic growth in towns and rural areas to provide at least 7,220 new jobs in the District', 'Protect and enhance the tourism and cultural facilities' and 'growth in rural areas that will help to support and sustain existing communities.'

Leiston, Saxmundham and District Citizens Advice state that the employment opportunities will be positive for the area. The housing growth is likely to lead to a growth in other forms of services such as access to advice and support. The Plan recognises the particular challenges people face living in rural areas and where community infrastructure can be broadened growth can take place inclusively and ensure needs in existing and new communities are not disadvantaged.

Suffolk Wildlife Trust comment that it must be ensured that the ecological value of the proposed Garden Neighbourhoods is considered and that significant environmental enhancements are included as part of the design such as maintaining and enhancing green corridors, provision of new green corridors and spaces and securing ecological enhancements.

East Suffolk Liberal Democrats question the economic assumptions behind the jobs growth figures when considering Brexit. The plan seems neutral on Sizewell. The Garden Neighbourhood proposals do not the adhere to the Garden City principles, as what appears to be proposed are housing developments of much higher density added to the periphery of existing towns, with minimal

investment in infrastructure, public spaces and neighbourhood facilities. The macro infrastructure is not sufficiently addressed including the four villages bypass, the East Suffolk train line, transport connectivity.

Leave The Layers Alone object to SCLP3.2 and query why the housing requirement has not changed from the in the adopted Core Strategy. The percentages of growth referred for different parts of the District are inaccurate and it is not clear what they are percentages of. The options should be the difference between 7,900 and 10,900 homes. 50% of new growth is planned for Major Centres, therefore 1,500 needs to be planned for elsewhere. In 2014 it was reasonable to assume that maintaining the existing distribution pattern was an acceptable solution – where is the evidence to support the need for redistribution in 2018? The SA also stated the future plans would identify the full identified needs, and these now appear to be the same as they were in 2014 and from 2010. There is no evidence of need in relation to homeless families, and demand is keep pace with supply. On the Issues and Options consultation maps, the shift in spatial distribution was larger than shown. The shift to the countryside is 1,895 homes and Saxmundham will take 42% / 50% of these. The 2013 Sustainability Appraisal assumed a similar distribution for the remaining 3,410 dwellings. Areas already under pressure have been put under more pressure as their capacity has not been reassessed. Land south of Saxmundham previously deemed unsuitable (in the 2014 SHLAA) has now been considered suitable.

Leave The Layers Alone state the justifications for the Garden Neighbourhood at Saxmundham relate to needs that could be provided for elsewhere e.g. the school and employment land. No options for fewer homes (600) have been modelled.

Woodbridge Society support Policy SCLP3.2 in terms of the concentration of development in the Garden Neighbourhoods.

### **Developers/Landowners**

Thorpeness and Aldeburgh Hotels Ltd object on the basis that of the 515 dwellings proposed for rural settlements in Table 3.3, 65 of these could be delivered as part of a mixed use residential and sports offering on site 981 in Aldringham cum Thorpe.

Code Development Planners comment that it is inappropriate and inflexible to dismiss new development in the communities neighbouring Ipswich. Infrastructure provided through Brightwell Lakes makes this a sustainable location for more development. The area has been identified in previous plans due to its highly sustainable location close to existing facilities. Paragraph 72 of the NPPF encourages planning authorities to consider larger scale development where well located and designed and supported by necessary infrastructure and facilities. The area around Brightwell Lakes could accommodate further development. Employment growth is dependent in part on proximity of housing and employment land. There should be further intensification and expansion of employment space in the areas to the east of Ipswich. The SA fails to consider all reasonable alternatives, it should consider an alternatives of complementing existing and emerging development, making the best use of land and most efficient use of infrastructure. The strategy is not the most sustainable option.

Code Development Planners welcome the use of the standard methodology and the objective of contributing to need across the Ipswich Housing Market Area. It will be essential to monitor need throughout the plan period to ensure an adequate supply of homes is maintained. The required employment land is also susceptible to changes in market conditions. The Employment Land Needs Assessment and the Sector Needs Assessment need to adequately assess the various inputs of each employment sector and land requirements, as per NPPF paragraph 82.

Suffolk Constabulary support the housing requirement derived from the standard methodology. Realistic assumptions are needed in relation to delivery rates at the Garden Neighbourhoods. Small and medium sites in sustainable locations can be delivered quickly.

Suffolk Constabulary - In relation to Table 3.2 it is considered that the start date and delivery rates for Brightwell Lakes are unrealistic. Paragraph 72 of the NPPF expects realistic delivery rates to be applied to development. The strategy should actively encourage the delivery of small and medium sized sites to compensate for potential delays at larger sites. The November 2016 Nathaniel Lichfield report demonstrated that the average annual build out rate for a scheme of 2,000+ dwellings is 161 per year. It is unrealistic to assume Brightwell Lakes will be significantly higher. It would be realistic to assume that delivery would commence in 2020/21 at the earliest. More land is needed to maintain a supply and the Suffolk Constabulary HQ in Martlesham Heath should be considered.

Suffolk Constabulary object to Table 3.3 in that the amount of growth directed to communities neighbouring Ipswich is too low, is an unsustainable approach and takes no account of the availability of a suitable previously developed site. Paragraph 102 of the NPPF expects opportunities to promote walking, cycling and public transport use to be considered at the plan-making stage and paragraph 103 expects patterns of development to support non-car use. The Suffolk Police HQ is within reasonable walking distance of services and facilities and is a previously developed site.

Artisan PPS Ltd object to the over-reliance on two large scale developments. Such sites have significant infrastructure requirements. There should be flexibility should the delivery of these sites fail. Housing numbers should be discounted from the first five years supply. The housing number should be seen as a minimum requirement through determination of applications. An over allocation of 20% should be made to reflect persistent non-delivery.

Suffolk Coastal District Council support paragraph 3.12-3.14 and policy 3.2. The proposals will align with the Garden Communities Prospectus (2018). Also support paragraphs 3.34 and 3.35 in relation to the spatial strategy and the over allocation to support delivery. As a major centre Felixstowe has capacity to absorb 46% of growth as a minimum. A Garden Neighbourhood or similar scale is a sensible approach to delivering development over the plan period and is in accordance with paragraph 72 of the NPPF. The main urban areas in Suffolk Coastal cannot absorb this. The North Felixstowe Garden Neighbourhood will help to deliver leisure provision through open space / green infrastructure and leisure facilities. The scale will provide much needed infrastructure and support residents which live and work in the area. It will provide new business and retail development. It will help to sustain the economic viability of the town and port. It will deliver significant quantities of retail to support residential areas.

Robinson, Peter supports the inclusion of a 10% contingency over and above the new standard methodology. The evidence base should be more robust so as that sequentially less preferable sites

are still recognised as representing sustainable development should the site be removed through the Examination. An additional policy should be included which contains support for sustainable development on unallocated windfall sites to enable areas such as Eyke to grow even if strategic housing ambitions are downgraded. A housing trajectory will need to be prepared.

Christchurch Land and Estates state that the involvement of Suffolk Coastal in the wider Ipswich Strategic Planning Area and the acknowledgement that housing numbers will be revisited is welcomed. The Council will need to undertake the calculations relating to housing need. 2016 should be the base date for the plan. The most recent affordability ratio should be used. It is likely that need will increase. The Council should consider the extent to which the housing number should be increased to reflect the high proportion of second homes in the housing stock. The Council should examine the extent to which the housing figures will enable the growth in jobs. It should not be assumed that a 10% increase will deal with these issues. The Council should allocate additional land. Site 645, Land at Yarmouth Road Melton, and site 451, Land to the north and east of Redwald Road, Rendlesham, should be allocated (*note: additional comments submitted under Appendix I*).

Pigeon Capital Management support the aspiration to deliver an ambitious plan. At Issues and Options stage Pigeon supported Option C. Support the approach to deliver above the housing requirement, and would support additional housing growth in line with the Council's 'Strategy for Growth'. This would help to retain younger workers in the District. The figure of 12,195 as contained in Table 3.5 could be used as a higher requirement. The distribution of employment around the A14 and housing throughout the District is misaligned and encourages commuting. Additional employment land should be provided in Saxmundham due to the proposed Garden Neighbourhood and the rail links. Site 716, Land South of Saxmundham (to the west of the A12) should be allocated.

Bloor Homes suggest that a third Garden Neighbourhood would be consistent with the agreed strategy. Promote site 1087, Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew, for development of 2,000 – 2,500 dwellings and associated infrastructure.

Heritage Developments and Waldringfield Golf and Leisure object due to the heavy reliance on existing allocations and planning permissions. If the NPPF definition of deliverable was applied to the identified supply the residual would be greater. Additional 'deliverable' sites should be identified.

Homes Builders' Federation welcome the decision to establish a housing requirement beyond the need identified through the standard methodology. The needs of the whole Housing Market Area should be met in full. Statements of Common Ground will need to be agreed between relevant authorities to establish how and where needs will be met. The two new Garden Neighbourhoods are welcomed however further development in the other market towns should be considered, including the identification of smaller sites to meet the requirement in paragraph 68 of the NPPF that 10% of the housing requirement should be on sites no larger than 1ha. The Council will need to provide evidence of how it will meet this aspiration.

Blythburgh Estate and Badger Homes object to the reliance on windfall in villages like Blythburgh where there are limited opportunities. If there are no allocations, few if any new dwellings may come forward. Provision of appropriate housing will not be addressed. The NPPF recognises the need to support rural communities.

Ipswich Town Football Club and the University of Suffolk support significantly boosting the supply of housing. It is unknown whether the housing figure is sufficient to assist Ipswich in meeting any unmet need from Ipswich. It is not clear why alternative scenario C was discounted. Concern that limited development is directed to communities neighbouring Ipswich including Rushmere St Andrew. Additional opportunities should be considered to reflect the sustainable location. Not all communities neighbouring Ipswich are producing a Neighbourhood Plan. The alternatives do not consider whether any growth could come forward that would not impact on delivery of the Ipswich northern route. Site 953, Land between Playford Road and Bent Lane, Rushmere St Andrew is promoted for development.

Grainger Plc object to the spatial strategy on the basis that the timetable does not align with that of neighbouring authorities or consider how to meet any unmet need from Ipswich. There is no joined up spatial policy and the vision is Suffolk Coastal –centric. Ipswich will have 50% of employment growth yet there is no new housing proposed in the East of Ipswich. Brightwell Lakes is less accessible than other locations east of Ipswich. Growth in rural areas cannot be at the expense of the county town. It is not clear how the proposals for Felixstowe and Saxmundham are within ‘environmental limits’ as defined in the vision. The only way to reduce pressure on the A12/A14 is to allocate housing close to employment. The area east of Ipswich is well served by public transport and investment in public transport could lead to more sustainable pattern of development. There needs to be clear evidence that east of Ipswich options would raise greater transport impacts than the proposed strategy. The Settlement Sensitivity Assessment identifies coalescence of Saxmundham with surrounding villages as a risk, but identifies greater landscape capacity in the east of Ipswich. There is no evidence to show that South Saxmundham Garden Neighbourhood will not alter the character and distinctiveness of the settlement as set out in the vision. The failure to address the east of Ipswich will undermine the longevity of the plan. The plan fails to comply with paragraph 22 of the NPPF as it does not consider the northern bypass. The plan is not consistent with the NPPF as it doesn’t plan flexibly, does not advance a strong reason why east of Ipswich is not considered, has not considered an allocation at Kesgrave to the provision and improvement of the Suffolk Aviation Heritage Museum and fails the Duty to Cooperate. It fails the tests of soundness.

Hopkins Homes object and state the new projections will need to be considered. A 20% uplift to the standard methodology should be applied which would be similar to the option of a 40% uplift to OAN which was previously consulted on. They state that the housing need figure should be 681 dwellings per year. Reference should be made to meeting unmet need from Ipswich which is considered to be around 2,000 – 2,500 homes, which would increase need to 718-743 dwellings per year. Suffolk Coastal is considered to be the most sustainable and deliverable location to meet unmet need and the housing target should be increased to meet this. Further sites should therefore be allocated.

Hopkins Homes assume that the requirement to accommodate 10% of the housing requirement on sites under 1ha relates to residual need. The Draft Local Plan only makes provision for 7.6% of the residual on small sites. More smaller sites should be allocated.

E R Winter and Son welcome the strategy to ‘provide opportunities for economic growth and create and enhance sustainable and inclusive communities’. This is in line with paragraph 78 of the NPPF.

Churchmanor Estates welcome the Council's desire to work with partners to 'raise the level of education, skills and training opportunities with the District' and to 'provide land to meet the needs of the main economic activities across the District and in doing so recognise the land requirements may exceed those set out in the evidence base.' There should be criteria to ensure that land released to serve the purposes of specific sectors is not lost to other forms of employment.

Churchmanor Estates generally support Policy SCLP3.2, however they suggest that under '(b) utilising opportunities...' the road corridor opportunity being focused on the A12/A14 and 'providing strategic employment allocations' should be identified. Welcome the proposal to allocate SCLP12.19 Land at Felixstowe Road, Nacton which will provide an accessible and high quality opportunity and signal confidence regarding investment in the area.

Millcard Ltd object to the strategy which proposes the vast bulk of housing in Felixstowe and Saxmundham and many sustainable settlements with no growth at all.

The Bawdsey Estate support the approach in policy SCLP3.2 as it sets high aspirations for significant economic growth and housing supply with a range of settlements. However it fails to address how delivery of growth in towns and large settlements will contribute to meeting needs across the District. Consideration should be given to the importance of focusing growth into other large and small villages.

Kesgrave Covenant object and state that the plan fails the tests of soundness. It should demonstrate that the needs of the Ipswich Housing Market Area can be met and consider allocations to meet Ipswich's need if needed. It should follow one of the alternative options put forward at Issues and Options stage which include allocation of land on the edge of Ipswich. Consideration of the wider Ipswich Housing Market Area would provide a more effective strategy. It is not considered to be consistent with national policy for these reasons. Suffolk Coastal should liaise more closely with Ipswich. The NPPF states that meeting needs from neighbouring areas is now integral to plan preparation. Land at Humber Doucy Lane, Ipswich should come forward for development.

Woolpit Business Parks Ltd support boosting the supply of housing. However there is uncertainty around whether this is sufficient to meet any unmet need from Ipswich. Support the approach to new housing in rural areas but are concerned over the limited development directed towards communities neighbouring Ipswich. These communities provide a comprehensive range of services. Whilst some growth may come forward through Neighbourhood Plans, not all communities neighbouring Ipswich are producing a Neighbourhood Plan.

Gladman Developments Ltd comment that the position remains unclear in relation housing numbers, pending the Government's review of the standard method. The evidence supporting the spatial strategy is unclear. It is difficult to determine why the locations of the new garden neighbourhoods have been determined and surprising that the plan has sought to defer the consideration of options to direct growth to areas neighbouring Ipswich to a future revision of the Local Plan. Gladman promote the inclusion of Orwell Green Village. It is vital that the growth in the plan can be delivered. There will need to be certainty that all 8,620 built / committed dwellings will actually be delivered. The Council must build in a contingency of 10-20%. Reference is made to the June 2016 Inspector's report for the Stratford on Avon Core Strategy which required the reserve to

be increased from 10% to 20%. There is a need to focus a large proportion of growth close to the Ipswich boundary.

Mayhew, Sarah objects on the basis that policy SCLP3.2 does not provide a clear direction on the scale of growth needed to support the Port of Felixstowe. Given the scale of need, it should be presented in this policy. In relation to Innocence Farm policy SCLP3.2 should include supporting text to clarify the justification for the finally selected scale of allocation(s) and a specific requirement (in hectares) for port related uses.

The Seckford Foundation object to SCLP3.2 on the basis that the spatial strategy will not help to meet needs or address affordability around Woodbridge. The policy does not refer to Market Towns. Table 3.3 shows that the Local Plan only allocates 2% of additional growth to the Market Towns, which will not help to meet the needs of existing communities. Residents will therefore find it very difficult to access new housing. They also comment that it is surprising that the Plan period is being rolled forward by 9 years yet on an additional 4 years worth of housing is being identified. It is considered that additional supply should be identified for the latter years of the plan period.

M Scott Properties comment in relation SCLP3.2 that it fails to acknowledge the needs of the growing elderly population. The demand/need for specialist accommodation is higher than that set out in paragraph 5.42. It is unclear whether needs for specialist accommodation are included in the overall housing requirement. The policy should refer to the quantum of housing needed to support those in old age. Support the strategic growth locations. Table 3.3 shows that Framlingham and Trimley St Martin have not been given sufficient focus in meeting the needs for specialist accommodation.

Cooper Webster, Camilla objects to SCLP3.2 on the basis that the housing need should be 509 dwellings per annum based on the latest available data, and this should be further increased to 568 per annum with a 10% uplift. This would increase the number of dwellings to be planned for to 3,873. Manor Farm, Framlingham could help to deliver this need. The Council's assumption that all permissions and allocated sites will come forward is optimistic, what is this assumption based on? The five year land supply identifies sites for 528 dwellings which may not come forward, plus a further 120 in allocations. Permissions which lapse or are close to lapsing should be removed. Sites with permission subject to section 106 agreement should be allocated to ensure that they are safeguarded should the permission not be issued. The spatial strategy overlooks Framlingham, contrary to the NPPF policies on sustainable development and the Local Plan Settlement Hierarchy. Land should be allocated at Manor Farm in Framlingham and this should be reflected in Tables 3.3 and 3.5.

Bloor Homes Eastern state that there is potential for Ipswich to consider sites across its boundary, in light of uncertainty around the full housing need. The strategy should include a new garden village on the north eastern part of Ipswich in Rushmere village. There is no reference in SCLP3.2 to the East of Ipswich Major Centre. It doesn't address strategic cross-boundary issues or the emerging Statement of Common Ground.

Persimmon Homes comment that all three options in the Issues and Options consultation included some growth on the edge of Ipswich. The two options that would see a significant allocation on the edge of Ipswich received greatest support. Brightwell Lakes is in the control of a single landowner, resulting in reduced competition in the supply of land. The East of Ipswich is at the top of the Settlement Hierarchy. The approach of relying on a review of the Plan in relation to the Ipswich

Northern Routes is contrary to paragraph 22 of the NPPF. Allocating land to the south of Kesgrave could support an Ipswich Northern Route without blighting the route. Concerned that the draft Plan is overly dependent on the two Garden Neighbourhoods which will have a significant lead in time. The housing trajectory for these should be published. The draft Letwin Review states there is a need for both small and large sites. Allocation of land to the south of Kesgrave would help to address this, and the site has been identified as sustainable.

### **Members of the Public**

District Councillors

Councillor Christine Block comments that no guidance is given to the terms 'adverse impact' and 'mitigation' in terms of how it is assessed and what the mitigation may be. Whilst this may depend on the nature and extent of the area and proposed development some explanation / definition of these statements should be included.

In respect of Rural Areas: Councillor Christine Block comments that the strategy implies top-down imposition of growth without evidence of need. There is no reference to meeting the needs for affordable housing or delivering infrastructure.

In Policy SCLP3.2 Councillor Christine Block suggests the inclusion of additional wording at d) 'appropriate growth in rural areas that will help to support and sustain existing communities.'

### Spatial Strategy and Distribution - general

Support

None received

Object:

The need for further infrastructure should also be informed by people who live in the areas.

There should be no more houses. Infrastructure needs to be improved first.

Disagree that rural areas need more development. People live in rural areas through choice not to be near services.

The plan should encourage use of brownfield land rather than valuable farming land.

Rates should be reduced to encourage take up of empty shop units.

Development is causing pressure on roads and infrastructure.

The plan will industrialise Suffolk Coastal. People choose to live in a rural environment. Concern over the loss of cultural identity. Housing needs should be based on local needs, not national needs. Consideration should be given to reducing second home ownership and using empty buildings. There has been a lack of attention to how infrastructure, including health services, schools and transport, will accommodate growth. There is no provision for public transport to link the new development to towns and villages. There is no suggestion of community cars. People will not use a cycle route to

undertake their weekly shop in Saxmundham. Concern over air pollution caused by log burners in new homes and by traffic. Oppose housebuilding along the A12. Where will people living in Darsham work? The South Saxmundham Garden Neighbourhood is positioned in the area for the proposed road to Sizewell C. There has been no joined up thinking. Concern over impact on the Area of Outstanding Natural Beauty which brings tourism to the area which underpins the economy and wellbeing of the area.

There should be small scale community wind projects rather than Sizewell C.

The document does not evidence the need for housing or employment land.

Observation:

It seems improbable that economic growth will improve affordability, especially if jobs growth precedes housing development. Increasing wages will raise house prices.

Rural communities should be supported with more assistance from Community Land Trusts rather than having large scale development imposed on communities.

Small scale developments can be more easily integrated whereas large scale development can cause damage to existing communities.

The proposals overwhelm small, historic communities. Concern over capacity of services and traffic impacts. Many rural businesses have no will or capacity to grow. The policy should be to create new self contained communities on brownfield sites close to rail and bus transport, with landscaping and green spaces. A sense of community would help to avoid social problems.

With this amount of growth the area may lose much of its charm and peaceful ambience, resulting in an impact on the tourism industry and quality of life.

### Garden Neighbourhoods

Support:

None received

Object:

There may be support for Felixstowe garden neighbourhood but very little support for the Saxmundham proposal. People have had enough of this building frenzy and need time to digest the earlier influx of people.

Mitigation from development is necessary if urban development is to take place but it does nobody any favours to dress up a major development as if it is an improvement to current opportunities for countryside recreation.

Concern over loss of green space through creation of Garden Neighbourhoods.

Object to classifying these as Garden Neighbourhoods as they are suburban style estates. It does not offer a robust range of employment opportunities and the majority of homes will not be affordable. It is difficult and costly to commute. It will be visually intrusive. There will be a significant traffic impact.

### Felixstowe

Support:

None received

Object:

Comments about Felixstowe Leisure Centre and Brackenbury Sports Centre reaching the end of their useful life are presented without evidence, the closure of these is likely to have a detrimental effect on the existing population and the council should explore other opportunities such as developing a modern sports facility to enhance the existing sports fields at Eastward Ho.

What is the point of dumping the Leisure Centre and Brackenbury Sports Centre in the middle of Grade 1 agricultural land – need further evidence as to why they have reached the end of their useful life, why can't they be modernised/maintained?

Paragraph 3.14 should include reference to the need for secondary education. There is a lack of choice for secondary education in Felixstowe. Any development in Felixstowe should be as self contained as possible to avoid congestion on the A14.

The current leisure facilities have not reached the end of their life / could be renovated). The attractions in Felixstowe focus on the seafront which is accessible and popular. The leisure centre should be a landmark attraction. It is not sustainable to replace a building. It is unsustainable / inaccessible to have the leisure centre out of the town centre. The proposed leisure centre is in the wrong place. It will result in more traffic.

Concern that there is an ongoing issue and no capacity in the sewerage system.

The primary schools are full. The plan does not mention that one existing school will be demolished. If children need to be transported elsewhere this will have an impact on traffic.

The High School is full.

The doctors and dentists are full.

No consideration has been given to infrastructure provision.

There is too much traffic in Felixstowe already. Felixstowe is a peninsula and there is therefore nowhere to build additional roads / mitigate traffic increases.

Concern over coalescence. Concern that Trimleys will become part of Felixstowe.

Felixstowe is not well served by services and facilities.

Agricultural land and greenfield sites should be protected.

Develop on previously developed land instead.

The Garden Neighbourhood will not support regeneration of the town.

The economy of Felixstowe is precariously reliant on the Port.

Objection to Innocence Farm due to loss of agricultural land, the facility needs to be on the western side of the Orwell Bridge, to facilitate distribution to the midlands and beyond and closures of the bridge. There will be fewer jobs due to automation.

There is a disproportionate burden on Trimley St Martin village and Parish which will have an adverse effect on the character and identity of the village. Concern over level of population increase in Trimley St Martin. The proposals do not accord with Settlement Boundary policies. Proposals are contrary to the Settlement Sensitivity Assessment. Concern over loss of access to the countryside and impact on traffic. Infilling should not be allowed.

There are no doctors or dentists in Trimley St Martin. An additional community building is needed, which is important for those living alone. Recreation space should not be contingent of the provision of more housing. Concern relating to Network Rail works and lack of grass cutting in the Parish. The Plan should not be based around Government directives. Planners should work collaboratively with landowners, developers and communities.

Observation:

What is a garden neighbourhood? Although there has been lots of building activity in the Trimleys, thus far there has been no sign of anything which will relieve the congestion, particularly in the High Road.

The Felixstowe leisure centre is run down although the site is valuable on the sea front as it provides an opportunity for people to use it in adverse weather.

A new school in Trimley St Martin is needed – areas within school grounds must be used by parents dropping off children and cars must not be left on the road blocking traffic.

### Saxmundham and the A12

Support:

Welcome the support for A12 improvements. The four villages bypass would remove the need for a park and ride at Marlesford.

Object:

Saxmundham already has a beautiful outdoor space called the Layers, development in this area would create infill between Saxmundham and Benhall which would cause both to lose individual identities. Creating a garden neighbourhood in this area is a ridiculous concept as there is no justification for employment or need for education. The plan is based on false facts and requirements and should be re-thought. There is no demand for housing in Saxmundham as units already built remain unsold on Church Hill.

Saxmundham garden “suburb” makes no reference to vital upgrades needed on the A12. Until road improvements are planned and delivered additional traffic should not be blithely encouraged or planned for.

Object to the disproportionate housing number in Benhall and Sternfield, and the concentration of 50 houses in one location. Benhall should not be a Small Village. The proposal is contrary to the Settlement Sensitivity Assessment. Growth should be on smaller plots throughout the village Benhall should not have 5% of new housing.

Object to the proposed Garden Neighbourhood as a method that will ‘create and enhance sustainable and inclusive communities.’ It will not create any employment. It is of urban style density out of character with the rural context and will destroy the buffer with Benhall. Benhall and Sternfield need to retain their local distinctiveness.

There is no evidence that the four villages bypass will get funding so growth in the A12 corridor cannot be supported. More housing will exacerbate current congestion around Ufford.

There has been a lack of genuine communication with communities. The whole picture should be presented and include details of those with vested interests. The plans for SEGway, housing at Saxmundham, Sizewell and the substation at Friston will lead to the urbanisation of the countryside. Employment associated with Sizewell and Friston will be temporary. There are numerous other sites for a substation than Friston. Many sites proposed for development are in flood plains, Area of Outstanding Natural Beauty or beside the estuary. There will be a loss of tourism income. What proportion of profit will go to communities? Who will afford the new homes? Where is the rest of the infrastructure? There is no need for the four villages bypass, there is no industry requiring haulage. The Plan will damage ancient woodlands, sites of architectural interest and historic landscapes. It will result in unaffordable housing in places with no infrastructure and result in more commuting. Consider cost effective options for minor road issues. Consider redeveloping brownfield sites.

A considerable proportion of the revenue for Suffolk Coastal comes from tourism, which is based around the unspoilt area such as the Area of Outstanding Natural Beauty. Therefore there should be an exception to meeting Government housing targets. Development at Saxmundham, along with other development, will suburbanise the hinterland of the Heritage Coast.

Oppose the four villages bypass as housebuilding with it will lead to coalescence of the four villages.

Observation:

Second home ownership needs to be addressed across the District and housing needs to be compatible with the needs of local people.

Support the comments of Saxmundham Town Council.

### Rural Areas

Observation:

Housing in these areas needs to be compatible with the needs of local people.

Communities Neighbouring Ipswich

## Object:

Object to providing for Ipswich need elsewhere having identified consequences of doing so in the Kesgrave / Martlesham corridor.

The Ipswich northern route would add to Kesgrave's infrastructure problems. The inner route would have a negative impact on Kesgrave, yet additional housing in Kesgrave would be developed to support it.

## Observation:

Infrastructure in Kesgrave would not cope with additional development.

Kesgrave is not shown on the Key Diagram.

Support strategy to spread growth around Felixstowe and Saxmundham. Would be concerned with any developments proposed on the other side of Humber Doucy Lane due to narrow road and pressure on existing services and infrastructure in the area.

The Local Plan should seek opportunities to conserve the highly threatened section of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Special Protection Area on the River Deben by identifying land for attractive "green exercise" as a result of the Brightwell Lakes proposals. Many communities are grateful, healthier and happier thanks to those with the foresight to establish public parks.

The Plan should allow for growth as presently exists, and then reflect infrastructure changes that have been agreed at least in principle.

The plan should acknowledge the insufficient infrastructure associated with past growth in Kesgrave. There will be no funding to maintain existing infrastructure. Concerned that Kesgrave could have more housing linked to the Ipswich Northern Route. The inner route is acknowledged as having the greatest impact on Kesgrave. Kesgrave should be recognised as a separate community to Ipswich and should not be listed as a major centre. Kesgrave is not a suburb of Ipswich, but is more closely aligned with Martlesham and Woodbridge. It should be categorised as a Market Town.

Providing for employment

## Observation:

Paragraph 3.26 should recognise that older people have talents too.

Growth in tourism and industries could be mutually exclusive.

The housing growth is not accompanied by an equal match in jobs growth which will mean that people will work elsewhere.

Boosting the Supply of Housing

**Object:**

Object to providing more homes than identified need.

There are a number of inconsistencies and use of data for 2018 and 2016 is confusing. There should be some details surrounding the housing growth target of 10,900 including the type of housing needed and the forecast population growth. Less than 10% are completed, therefore there will need to be an increase in the infrastructure to support the population, and it is unclear whether these have been planned for. There will also be pressure on the environment, roads and services. Query whether the 10% contingency is too high. More than half of the villages have received no allocations whilst the rest bear an undue burden. The lack of details of the current housing stock makes this difficult to assess. It is not clear whether the increase is justified on economic grounds.

Do not understand why there needs to be a 10% increase.

Building homes should not be confused with economic growth associated with the delivery of increased productive capacity in the local economy. Building more houses for people to migrate into Suffolk will only further damage our economy by reducing the number of economically active people in the district.

There is little concern for the existing distinct characteristic of Suffolk Coastal – it is driven by economic development. It will be difficult to refuse anything.

Concerned over increasing development in the area.

The majority of new housing is beyond the reach of younger generations.

The Local Plan seems focused on meeting housing requirements. There is a lack of infrastructure proposed.

Brownfield sites could be better used for housing.

**Observation:**

Paragraphs 3.30 and 3.31 set out different dwelling requirements – clarify which is correct.

Housing delivered under previous plan failed to address housing needs of existing communities including the need for affordable homes and housing suitable for people to downsize. Concern over lack of infrastructure.

Distribution of Housing**Object:**

The total is likely to be in excess of 3,370 when accounting for windfall and projected delivery in the earlier part of the plan period. Delivery of affordable housing should not be dependent on allocations coming forward, and should require strengthening of requirements for provision of affordable housing on housing developments. Viability should not be a reason for this to not be met. Small villages are being pressurised into building unnecessary homes.

Spatial Distribution of Residual Housing Requirement

**Object:**

The Council should propose building a few houses in each village, rather than huge blocks. Small developments in each village could mean the saving of the village shop/pub/school and village community.

The proposals appear unrelated to the Settlement Hierarchy, the size of a settlement or the capacity to absorb new housing.

It is clear that Otley is providing for more than it needs. Yoxford is well related to the A12, yet is providing far less than Otley. It is not clear why Aldeburgh has no new allocations.

Concern about the number of houses planned for the Felixstowe peninsula due to infrastructure constraints – they should be built along the A14 or inland instead.

Concern over loss of greenbelt and agricultural land. There is no thought for the health of villages in the Felixstowe peninsula.

**How these comments have been taken into account in the Final Draft Local Plan:**

Comments received from statutory consultees have resulted in changes to other sections of the plan or incorporated into the evidence base documents. Reference to the historic environment has been boosted throughout the district wide policies and or site allocations as appropriate. The Final Draft Local Plan has been subject to Habitats Regulation Assessment and findings of this been included as necessary.

The strategy has been evolved through public consultation responses and where possible opportunities to redevelop previously developed land has been identified. Positive and proactive site allocations for the reuse of sites such as Martlesham Police Headquarters and Felixstowe Leisure Centre have been added to the Final Draft Local Plan. The strategy is consistent across the District in that it seeks to retain the individuality of communities and resist settlement coalescence whilst respecting the natural and historic environments.

The Final Draft Local Plan has been updated to reflect a revised housing target across the District and provide clarity around the spatial strategy for growth and distribution. As a result of the housing number increasing based on the Government's standard methodology, the Council no longer considers it appropriate to include a 10% increase in housing provision, but still maintains an over allocation of sites. Many comments received to this section are addressed through individual area strategies or site allocations which seek to deliver the strategy outlined and supported through public consultation responses. Details of these site allocations can be found in chapter 12 of the Final Draft Local Plan. Sources of information and statistics have been addressed and updated where revised data is available.

During the preparation of the Final Draft Local Plan, the Council has been working in conjunction with neighbouring authorities to identify a Statement of Common Ground in respect of cross boundary strategic issues. The Statement of Common Ground will be published alongside the Final Draft Local Plan and clearly sets out the areas of common ground between authorities. A common approach will ensure that the collective needs of the area will be met over the plan period.

The economic targets set out in the policy are informed by a robust and credible evidence base

which outlines the District's role in supporting the local economy. Ensuring that economic opportunities remain and flourish within the District is a key priority of the East Suffolk Business Plan and the Final Draft Local Plan will facilitate this.

The Garden Neighbourhoods provide a key part of the Final Draft Local Plan and public consultation responses have informed the supporting text and policies for these in chapter 12. Opportunities have been identified based on consultation responses and the ability to realise greater benefits in terms of comprehensive infrastructure provision to support the new communities and the needs of existing residents.

Consultation responses at the Issues and Options stage, further supported by engagement with town and parish councils has demonstrated that growth should be encouraged and brought forward in the rural parts of the District. This will enable communities to thrive through continued support and use of existing infrastructure. The Final Draft Local Plan provides further justification in respect of spatial strategy and distribution across the District and has been informed by the consultation responses.

## Policy SCLP3.3 Settlement Hierarchy

Total comments	Support	Object	Observation
90	11	49	30

### Statutory Consultees

Suffolk Constabulary support the proposed approach to the settlement hierarchy but consider that (as currently set out) it is inconsistent with the spatial distribution strategy set out in Table 3.3 and Table 3.5 in that it restricts the amount of development directed to Martlesham Heath. Suffolk Constabulary consider Martlesham Heath to be a sustainable location and a suitable location for additional development. They request that more development is directed to Martlesham Heath to reflect the availability of previously developed land with no constraints to development at the Suffolk Constabulary HQ site.

Suffolk County Council AONB Team agree in principle with the proposed Settlement Hierarchy set out in policy SCLP3.3 which seeks to direct development to the Major Centres as a priority then to large villages, small villages with limited development proposed in land classed as countryside. They also agree in principle with the policy approach set out in Table 3.4. for how development will be delivered within each settlement category.

### Parish and Town Councils

Wenhaston with Mells Hamlet Parish Council believe that the village should be designated as a small village and not a large village. Assumptions made on facilities in criteria are flawed. The convenience store is not inside the settlement, No other retail facilities in the parish. No doctors surgery, Not within 5km of Halesworth, Post office is part time. Deducting points for these reasons would show Wenhaston is a small village.

Chillesford Parish Council highlight that the parishes of Butley, Wantisden and Capel St Andrew function as one and therefore should be taken into account as one for the purposes of the settlement hierarchy scoring. Parish Council highlight employment and tourism opportunities at Tangham Forest, Butley Priory, Wantisden Valley and self catering establishments. Considering the parishes together shows that the idea of downgrading the settlement in the hierarchy is not acceptable.

Ufford Parish Council strongly approve the amended categories and are please to be denoted as a small village which is more accurate.

Tunstall Parish Council agrees with the classification of Tunstall as a small village.

Trimley St Mary Parish Council are delighted that there is no further housing allocations for the village. Acknowledge that part of the Felixstowe Garden Neighbourhood lies within the parish.

Sutton Parish Council suggest that mobile and broadband signals are included within the scoring for settlement hierarchy. Parish Council also highlight that points should be deducted from Sutton as the information is incorrect and services in the village are limited (such as public house closing and mobile library attending for 20 minutes a month. Current settlement hierarchy does not take

account of the real position of services in the village and should be returned to countryside classification.

Great Bealings Parish Council support the classification of their village as part of the countryside.

Kelsale-cum-Carlton Parish Council not the designation of a small village in the settlement hierarchy.

Darsham Parish Council query the completion figures for the period 1/4/2016—31/3/2018 suggesting it should be at least 20. The Parish Council suggest that Darsham parish is contributing more than 3 times any other small village with the exception of Benhall.

Kettleburgh Parish Council objects to the proposed change to the Settlement Hierarchy and wish to see the retention of the hierarchy as set out in the Core Strategy. If the hierarchy is to be reviewed, then the parish consider a score of 9 (as opposed to 11) to be the correct score for Kettleburgh, this would change the settlement type from 'Small Village' to 'Countryside'. The Parish also raise a number of anomalies/ errors in the topic paper which, if accepted, would result in a further reduction of 2 points for Kettleburgh making the total 7 points.

Felixstowe Town Council supports the principle of the proposed Settlement Hierarchy but asks that consistency and clarity be given to the housing totals in the preceding tables (Table 3.2: 3,370 homes, Table 3.3: 3,560).

Aldeburgh Town Council calls for policies which would attract employers to the town to safeguard employment sites and believe the town should be re-designated as a destination town to attract potential job providers.

Benhall and Sternfield Parish Council believe the number of completions etc. in table 3.5 is wrong and should read 39, rather than 15.

Sudbourne Parish Council welcome the move to redefine smaller villages without sustainable facilities as 'countryside'. However, they consider the statement at 3.37 ('...in some of the more rural parts of the District opportunities for sustainable transport may be more limited but ...some development may, nevertheless, help to sustain communities...') to contradict the principles behind the hierarchy.

Little Bealings Parish Council agrees that there should be no housing allocation to Little Bealings, and (on the basis of their own assessment of facilities) request that the parish be classified as 'Countryside', not 'Small Village'.

Peasenhall Parish Council have requested that the designation of Peasenhall as a small village be reviewed. They argue that the village provides a good range of facilities (albeit no primary school) and that re-categorising the village as a large village would encourage a level of growth that would support the current facilities. They have also queried whether the figures in Table 3.5 for Peasenhall and part Sibton are correct.

Bawdsey Parish Council support the principle behind the settlement hierarchy but think this work should be only be done with the agreement of the settlements concerned.

Aldringham Parish Council suggest that defining Aldringham as Countryside does not align with Policy SCLP5.3: Housing Development in the Countryside and Policy SCLP5.4: Housing in Clusters in the Countryside, where it talks about clusters of housing and limited development which does not relate to villages in the countryside with a high number of dwellings.

Snape Parish Council note that within the Local Plan, Snape is identified as a “Large Village” and the parish council would like some further discussion around the criteria and information.

Butley, Capel St Andrew & Wantisden Parish Council raised concerns about their designation as ‘Countryside’ and highlight that the parishes of Butley, Wantisden and Capel St Andrew function as one and therefore should be taken into account as one for the purposes of the settlement hierarchy scoring.

Levington and Stratton Hall Parish Council raised concerns about increased traffic and associated air pollution if there were to be an increase in development in small villages.

Otley Parish Council comment that being classed as a Large Village has led to housing allocations, Otley is one of the smaller Large Villages. Residents value the countryside and the village atmosphere. It should remain as a village.

Westerfield Parish Council query Table 3.5 as to why the number of proposed houses in Westerfield has increased from 61 to 91 when no new allocations have been added since the Site Allocations and Area Specific Policies plan. Westerfield Parish Council support the decision to have no new housing allocations for Westerfield during the plan period and support the policies on settlement boundaries and Housing Development in Small Villages.

Hacheston Parish Council believe that the figures identified in Table 3.5 are appropriate for Hacheston over the period 2016 - 2036. Further development within this period should be resisted.

### **Other organisations**

Wenhaston Neighbourhood Plan Group highlight that the scoring given for Wenhaston is incorrect and points should be deducted in respect of convenience store, doctors’ surgery, post office and other retail facilities. Outcome of deductions is Wenhaston being classified as a small village.

Wenhaston Neighbourhood Plan Group also wish to challenge the new allocation of 25 units, this should be reduced to single figures as Wenhaston has already contributed some provision.

### **Developers/Landowners**

Thorpeness and Aldeburgh Hotel suggested that Thorpeness and Aldringham should be taken as one settlement with shared services and therefore be combined as a Large Village.

Sanlam Life and Pensions think the settlement hierarchy does not give adequate weight to small settlements which are currently proposed as countryside but close to major centres or market towns. Greater weight should be given to these communities (such as Saxtead) to provide additional housing within easy access and close proximity to larger communities.

Knodishall is identified as a large village and is capable of providing housing growth. A site allocation to the west of the village abutting the defined settlement boundary is proposed for residential development. Identifying land in Knodishall will ensure it is consistent with other large villages across the district.

Artisan PPS Ltd object to table 3.5 and specifically to the non-allocation of housing development land in Ufford village as a failure to recognise the opportunity to provide for additional housing and special group need housing on the Employment land/previously used land at Crown Nursery.

Christchurch Land and Estates (Felixstowe) Limited consider Rendlesham (as a large village) to be a sustainable location for growth and query why no new allocations are proposed there. Development should be directed to such areas, with settlement boundaries being reviewed to accommodate residential led and/or mixed use development in order to address the district and local need for open market and affordable housing and other infrastructure identified.

FCC Environment request that development outside settlement boundaries should be considered in the plan in order to meet community needs. FCC considers that tourism development should be included as an appropriate use within Table 3.4 in accordance with the NPPF which states that “planning policies and decisions should enable: ... c) sustainable rural tourism and leisure developments which respect the character of the countryside...”

Pigeon Capital Management 2 Ltd support the allocation for up to 800 new homes to the south of Saxmundham, but consider that additional growth in Saxmundham should not be constrained on the basis of that allocation. Pigeon also supports the allocation of Trimley St Martin as a ‘Large Village’ which has the services and facilities to support new housing allocations within the redefined settlement boundary.

Bloor Homes Eastern request consideration of a third Garden Neighbourhood at Rushmere St Andrew. Highlighting the identification of the area as a major centre of within the proposed Settlement Hierarchy.

Ipswich Town Football Club and the University of Suffolk support the identification of ‘East of Ipswich’, which includes Rushmere St Andrew (excluding the village) as a Major Centre, but express surprise that there are not high levels of growth being promoted in this area through the Local Plan Review.

Hopkins Homes Ltd consider that (despite being identified as a Market Town in the Settlement Hierarchy) Woodbridge has under-delivered against the level of housing that would be expected of a town of its size and importance in the context of the District, accommodating incremental infill growth only. They consider the lack of allocations in Woodbridge to be contrary to paragraph 65 of the NPPF and the plan is therefore unsound. They argue that the Plan should be positively seeking to allocate additional sites for housing development, particularly in the higher order sustainable settlements located along the A12 corridor such as Woodbridge. Hopkins Homes Ltd suggest that sites, particularly those of a strategic nature, should be allocated within Neighbourhood Plan areas to provide certainty that there will be a sufficient supply of land to meet the housing needs identified.

E R Winter & Son support the settlement hierarchy and policy in general, in particular reference to windfall sites coming forward throughout the plan period, and housing allocations being made across the hierarchy, from ‘Major Centre’s’ to ‘Small Villages’.

The Bawdsey Estate request that Policy SCLP3.3 be amended to reflect Shottisham’s potential growth as a small village, rather than a Countryside Settlement and that the housing growth strategy for smaller villages and countryside settlements be amended to allow for greater flexibility in relation to housing delivery.

Woolpit Business Parks Ltd welcomed the approach, in that, large and small villages are considered to be suitable places to accommodate new housing, and it is suggested that a small development of housing at Little Bealings could assist in providing growth in the rural area.

Gladman Developments Ltd note the process that has been undertaken to establish a settlement hierarchy. However, they consider that the area to the East of Ipswich functions at a higher level than the Major Centre of Felixstowe and the Market Town of Saxmundham and request that this be fully recognised within the proposed settlement hierarchy and the final spatial strategy for growth and the associated site allocations.

Roxlight Holdings Ltd object to Blaxhall being countryside, and suggest the youth hostel and employment opportunities have been overlooked. There are a number of employment opportunities in Blaxhall, which they have listed.

M Scott Properties Ltd object on the basis that the policy is a significant departure from the existing Local Plan, whereby allocations allowing extensions to meet local needs are accepted. Trimley St Martin considered capable of accommodating more strategic levels of growth and whilst it has the largest indicative housing contribution over the plan period of any settlement (after Felixstowe and Saxmundham), as shown in Table 3.5, this is not reflected in the settlement hierarchy. The policy should reflect Trimley St Martin's growth potential. There should be flexibility in Large Villages to respond to needs for specialist accommodation. Trimley St Martin's population of 70+ is expected to grow by 22% by 2021.

Suffolk Constabulary consider that the number identified for Martlesham in Table 3.5 is too low and is unsustainable. Martlesham is accessible by walking and cycling and contains a good range of services and facilities. The Police Headquarters is a brownfield site.

Bloor Homes object on the basis that there are no allocations in the East of Ipswich Major Centre. Rushmere St Andrew functions as part of Ipswich. This contrary to the NPPF and to chapter 2 of the First Draft Local Plan. The Local Plan fails to address cross boundary opportunities. Brightwell Lakes is unlikely to make a significant contribution prior to 2020/21. It cannot be certain that allocations will be forthcoming on the Kesgrave and Martlesham Neighbourhood Plans.

The Suffolk Punch Trust support the inclusion of Hollesley as a Large Village on the basis that it has a good range of shops, services, and facilities. Hollesley has a primary school, village hall/community centre, and a convenience store, and is therefore deemed suitable for new housing allocations.

Millcard Ltd object to the distribution of housing in the draft local plan because, despite 'promoting' a rural strategy the Council has chosen to site the vast bulk of the housing allocations in only two places; Felixstowe and Saxmundham, leaving many sustainable settlements with no future housing growth at all.

## **Members of the Public**

### **District Councillors**

Councillor Christine Block comments that the following statements are helpful:

*'whatever the size and location of a community, too much development, too soon, or of the wrong type can damage the environment . . . .'*

and the

*'NPPF encourages housing delivery where it will enhance or maintain the vitality of communities. . . .'*

However, the translation of these statements into policy appears divorced from requirement for evidence of need. In the list of Large Villages in the Settlement Hierarchy the substantial mismatch between facilities available in rural villages and more urbanised communities should be recognised in some way.

**Support:**

Allocation of Kettleburgh as a small village would seem reasonable

Agree strongly that Blaxhall is downgraded from a village to a 'hamlet'.

Support the strategy for Hacheston set out in Table 3.5. There are problems with water supply in Hacheston. Support the statement that 'housing in the countryside can have impacts upon the landscape and natural environment' and so "it is therefore important that the Local Plan achieves the correct balance between supporting some development that can help to sustain rural communities while not resulting in harm to the environment and undermining the reason for which people choose to live in and visit the District".

**Object:**

Brandeston does not have a village shop and hasn't been one for many years. The information for Brandeston is incorrect, the village does not have a shop, the bus service is minimal and the pub is not robust.

Strongly disagree with the position of Sutton in the settlement hierarchy. Council need to relook at scoring given to Sutton and categorise the village as countryside. Proposed allocation is not needed and would not be in the best interests of the village as the houses will not be affordable to most people. Incorrect data in respect of Sutton clearly shows that a misclassification has occurred and Sutton should be reclassified based on evidence provided which shows that current scores given are incorrect. Sutton should be classified as countryside rather than small village. That scale of development in a rural village with no facilities in an Area of Outstanding Natural Beauty is far more than is reasonable.

The scoring associated with Benhall is incorrect. The village does not have a convenience store and there is no village hall. Next document needs to delete the wording relating to convenience store and village hall in respect of Benhall.

Methodology for settlement hierarchy assessment does not take into account existing populations or the proposed increase due to developments. Scoring for Kettleburgh needs to be considered in respect of Place of Worship, Playing fields, Bus service, Mobile library and distance from a service centre. Increase development in Kettleburgh and Brandeston will generate additional level of traffic and the lack of public transport in the villages contributes to congestion levels.

Object to scoring which makes Aldringham a small village, the village does not have any convenience stores, only one place of worship and no playing field. These changes would put Aldringham into the countryside category. Corrected scorings for Aldringham have been provided by respondents.

Level of growth that has come forward and is proposed for Westleton is not acceptable.

Figures in Table 3.5 for Wickham Market needs to better reflect the work of the Neighbourhood Plan. It would seem more logical to make the Column C figure for Wickham Market 120.

Felixstowe the peninsula (dead end) has over one quarter of the whole figure

Strongly object to the "East of Ipswich" categorisation of Kesgrave, Martlesham Heath, Purdis Farm and Rushmere St Andrew. The approach does not preserve the separate identity and character of existing settlements, "East of Ipswich" is a highly confusing and unhelpful label to use. Kesgrave should be classified as a small town (distinct from the historic market towns) and Rushmere etc are probably better classified as large villages. In particular it is vital that any new development in these settlements (housing, business, retail, etc) is appropriate to the scale of the development. Even more vital that we don't get some kind of urban sprawl, from Ipswich across Rushmere Heath, or a rural/semi-urban sprawl between large villages/small towns which causes them to lose their identity, boundaries and sustainability.

There is no need for an additional 50 houses in Benhall. There is no local demand for housing in Benhall. The 38 units at the Whitearch site should be counted in the anticipated housing delivery schedule.

The proposed level of growth in Easton is inappropriate and a disproportionate increase in housing.

Kesgrave should not be a major centre, the communities of "old" and "new" Kesgrave need time to settle and to integrate.

There should be no more houses in the Trimleys and Felixstowe area.

**Observation:**

Yoxford is classified as a large village, but concerned about the ability of the village hall to provide for activities. There needs to be provision for rebuilding/restoring the hall to enable its important function.

The plan deals with part of Peasenhall and that part of Sibton parish which is immediately adjoining Peasenhall. As a result of the changes in the criteria and of the closing of facilities, it must be accepted that the settlement should be considered a Small Village (rather than a Key Service Centre).

**How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan has taken into account the comments received. The comments have influenced the settlement hierarchy as seen in the Final Draft Local Plan. The settlement hierarchy topic paper has been reviewed in light of consultation comments and where appropriate scoring for settlements been amended to reflect updated information.

The settlement hierarchy in the Final Draft Local Plan has been revised to reflect the amendments to scoring which has influenced some communities, such as Sutton to move into countryside settlement with no settlement boundary and therefore allocation no longer considered appropriate.

The topic paper on the Settlement Hierarchy will be published as part of the evidence base supporting the Final Draft Local Plan.

## Policy SCLP3.4 Settlement Boundaries

Total comments	Support	Object	Observation
35	8	13	14

### Statutory Consultees

Suffolk Constabulary- all of the settlement boundaries should defined in the Policies Map regardless of whether the boundary falls within a made neighbourhood plan area.

### Parish and Town Councils

Wenhaston Parish Council believe the draft Housing allocation of 25 is excessive and to meet these requirements would mean changes to the settlement boundary which is not in line with the Neighbourhood Plan.

Kelsale-cum-Carlton Parish Council identify that the village is formed of a densely populated core, comprising the historic Kelsale and Carlton Villages and largely enclosed by the settlement boundaries.

Felixstowe Town Council supports this policy.

Aldeburgh Town Council welcomes guidance on Settlement Boundaries and supports restrictions on development in the countryside.

Sudbourne Parish Council- In principle welcomes the move to redefine smaller villages without sustainable facilities as 'countryside', and thus to remove their settlement boundaries and the possibility of housing allocations.

Campsea Ashe Parish Council-. Request clarification regarding the settlement boundary for the village.

Little Bealings Parish Council- agrees the location of the red line boundary. However, it notes the loss of land previously coloured yellow (Area to be Protected from Development) and green (Special Landscape Areas) and requests that this status for the land be included.

Bawdsey Parish Council note that the second paragraph gives important protection for villages, and also indicates significant role of neighbourhood plans.

Peasenhall Parish Council – Request an additional settlement boundary around the Mill Road area of the village.

Aldringham-cum-Thorpe Parish Council believe that settlement boundaries, have an important role to play in clearly defining the limits of acceptable development and support the criteria identified in the policy.

Westerfield Parish Council support the continued use of Settlement Boundaries.

### Other organisations

Aldeburgh Golf Club request that the following wording be added after first sentence: “New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.”

Aldeburgh Society – request an amendment to the settlement boundary for Aldeburgh, to exclude the tract of open space associated with phase 2 of the Brickyard development.

### **Developers/Landowners**

Thorpeness and Aldeburgh Hotel think the settlement boundary of Thorpeness should include site 981 to allow future growth of leisure industry as well as providing market and affordable housing.

Artisan PPS do not think that this Policy is Framework 2018 compliant and in that it fails to recognise the Government's approach to the location of employment accommodation/sites in rural areas as expressed in para. 84.

Ambury Developments Ltd - Object to the settlement boundary at Westerfield and request it be extended to include their site (192 in the Strategic Housing and Economic Land Availability Assessment).

Pigeon Capital Management 2 Ltd support the principle that development boundaries are reviewed to support the level of growth that Saxmundham can accommodate. They also support the proposed revision to the settlement boundary for Trimley St Martin.

Hopkins Homes Ltd request that Policy SCLP3.4 be amended to include a caveat that the settlement boundary can be breached and a positive approach taken reflecting the presumption in favour of sustainable development contained in the NPPF and Policy SCLP3.1.

E R Winter & Son- In principle support this policy and particularly support reference to revisions to settlement boundaries, and allocations coming forward through Neighbourhood Plans. They consider this policy is in line with Paragraph 79 of the 2018 NPPF.

Gladman Developments Ltd - do not consider the use of settlement boundaries to be an effective response to meeting development needs. They suggest a criteria based policy against which development adjacent to the existing built up area of settlements can be assessed would better align with the provisions of the Framework.

Roxlight Holdings object to the removal of the Blaxhall Settlement Boundary. The boundary should be extended to encompass the dwellings to the north, the allotments and the dwellings on Old Post Office Lane.

Bloor Homes Eastern object and state that the policy fails to recognise the relationship between Rushmere St Andrew and Ipswich. The Local Plan fails to make any significant new allocations in Rushmere.

### **Members of the Public**

#### **Support**

Agree these provide easily identifiable and controllable constraints on development. However, their landscape and heritage contexts must be fully understood and consulted upon before amending them.

## Object

The proposed development of the Layers is a direct contravention of the settlement boundary between Saxmundham and Benhall.

Objection to the amended boundary at Otley.

The Saxmundham Garden Neighbourhood plan extends significantly into the parish of Benhall. This will result in undesirable coalescence and loss of amenity. Consideration should be given in this Local Plan to reducing the land allocation to that lying west of the railway line and to revisiting the need for land east of the railway in a subsequent Local Plan.

Observation:

There should be greater flexibility about development, particularly smaller ones outside of Settlement Boundaries. These are arbitrary and in some instances (like Witnesham) are not drawn accurately and do not reflect the past and potential development in the vicinity of Witnesham School.

Policy SCLP3.4 should make it clear which Settlement Types within the Settlement Hierarchy shall have defined Settlement Boundaries. Where a settlement loses their boundary, there should be provision to prevent development outside their current boundary other than that allowable under proposed new Policies SCLP5.2 and SCLP5.3.

Found the interactive map very difficult to navigate.

Settlement boundary for Peasenhall should be extended to include the 'Church Lands Trust' site in its entirety.

Boundary anomalies at Dennington need to be addressed.

Request an additional settlement boundary around the Mill Road area of Peasenhall.

There is no identifiable need to justify exception sites at Hacheston.

### **How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan and the settlement boundaries as shown on the policies map have been informed by the consultation responses. Where mapping errors have been identified these have been corrected. Other changes to the settlement boundaries have been made as a result of allocations being identified in the Final Draft Local Plan. Allocations have been identified which accord with the spatial strategy and distribution. Details of these are found within Chapter 3 and Chapter 12.

The policy text has been amended to reflect the wording proposed by Aldeburgh Golf Club to highlight that the principle of development is accepted within defined settlement boundaries.

## Policy SCLP3.5 Proposals for Major Energy Infrastructure Projects

Total comments	Support	Object	Observation
19	4	6	9

### Statutory Consultees

Historic England are concerned that there are no specific requirements for the historic environment within this section and Policy SCLP3.5. Provisions to avoid and if not minimise the impact of these development on the historic environment, particularly through colocation of infrastructure requirements and enhancement of setting through restoration after decommissioning.

Environment Agency agree with the policy in general, however should look at preventing environmental damage rather than compensating for it.

Suffolk County Council support the intent of the policy.

### Parish and Town Councils

Middleton cum Fordley Parish Council generally support developments for renewable energy generation, but are sceptical with regard to the need for, and economics of Sizewell C. Expect the Council to have strong policies targeted on the mitigation of landscape intrusion, environmental damage and disruption caused by construction traffic. The B1122 is quite clearly unsuitable for the volume of construction traffic associated with Sizewell C and alternative route is needed.

Kelsale-cum-Carlton suggests that the Council should take the “honest broker role” in liaising and working with all the coastal communities impacted by Major Energy Infrastructure Projects.

Benhall & Sternfield Parish Council welcome the inclusion of this policy and in particular the identification of the need to protect local communities from the impact of the developments.

Snape Parish Council support the position of Suffolk County Council and Suffolk Coastal in encouraging Scottish Power to access the grid at Sizewell rather than building a new substation at Friston or elsewhere.

Aldringham-cum-Thorpe highlight that Policy SCLP3.5 is a key policy. Applying the principles within this policy will be essential for the protection of the countryside and well-being of the rural communities.

### Other organisations

RSPB seek explicit mention of the effect of light and dust on nature conservation sites, there are other impacts that could potentially be more significant and should be recognised in Table 3.6. Table 3.6 should also include habitat loss, noise disturbance, hydrological changes and effects on coastal processes.

Suffolk County Council AONB Team highlight that Policy SCLP3.5 should be amended to identify the need for a separate robust assessment of all potential impacts on the Suffolk Coast and Heaths

AONB, as this would demonstrate compliance with Duty to Regard (Section 85 of the CROW Act 2000) and ensure that the impacts of NSIP's on the AONB are fully considered.

Suffolk County Council AONB Team suggest changes to Table 3.6 to include reference to Suffolk Seascape and the AONB.

Suffolk Constabulary request addition of Police Facilities to the Community theme in Table 3.6. Additional reference to police and community safety to be included within Policy SCLP3.5

RSPB suggest that habitat loss, noise disturbance, hydrological changes and effects on coastal processes should be recognised in Table 3.6

### **Developers/Landowners**

EDF Energy strongly support the First Draft Local Plan and the recognition of the economic significance that is seen from the existing Sizewell complex but also proposals for Sizewell C.

EDF Energy state that there can be confusion in relation to the role of National Policy Statements and the Local Plan. Paragraph 3.132 and Strategic Policy SP13 set out the position very clearly and it would be helpful if the Local Plan could set out a similar approach.

### **Members of the Public**

Support

None received

Object

Object to the lack of coordination between the Local Plan and the Nationally Significant Infrastructure Project. The cumulative impact of the Saxmundham Garden Neighbourhood and access routes for Sizewell are disjointed.

Overriding concern is that energy projects are being treated separately. Being located on different sites raises all sorts of questions about coalescence, transport, equipment and waste along county lanes completely unsuited for such traffic.

Object in relation to concerns of the impact of Sizewell C including the lack of decision on location of worker accommodation, the undefined specifications for connections, issues of coalescence and that Friston will become isolated.

Observation

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text and policy on Major Energy Infrastructure has been amended following the responses on the First Draft Local Plan. Amendments have been made based on responses from the RSPB, AONB unit, Suffolk Constabulary and EDF Energy.

Reference to the table of themes to be considered has also been included within the policy to provide further reinforcement between the supporting text and policy.

Comments received in respect of the objection to the proposals for a new Nuclear Power Station at Sizewell have not been taken into account within the Final Draft Local Plan. The Council as local planning authority is only a consultee on any future application. The exact details of site, construction and access will be covered through a Nationally Significant Infrastructure Project to which the Council will be consulted upon. The policy and supporting text within the Final Draft Local Plan provide a starting point for the Council and local communities to engage with the Nationally Significant Project at the appropriate stage.

## Policy SCLP3.6 Infrastructure Provision

Total comments	Support	Object	Observation
52	7	13	32

### Statutory Consultees

Historic England support the approach to enabling development. However recommend that alternative phrasing is provided to highlight how exceptional the circumstances are for enabling development.

Environment Agency outline that Policy SCLP3.6 adequately addresses the need for development to be phased in line with Water Recycling Centre upgrades where necessary. Recommend following sentence is added to Policy SCLP3.6 at the end of paragraph 6 ...“Where there is no capacity in the water recycling centre, development may need to be phased in order to allow improvement works to take place. The agreed improvements should be in places ahead of occupation of proposed dwellings in order to avoid a breach of environmental legislations.”

Suffolk County Council welcome the District Council’s commitment to work with partners and support the position that development contributes to infrastructure needs generated. Suffolk County Council outline that S106 is the most appropriate means of mitigating site specific impacts and offers greater certainty to ensure impacts are mitigated appropriately. Paragraph 3.56 should include reference to Public Rights of Way. Include references to Water Cycle Study and the Suffolk Holistic Water Management Project. It is the strong recommendation of the County Council that off-site highways infrastructure be funded through S278 and condition where possible, then, if there are multiple funding sources, by S106. Should neither S278 or S106 be appropriate, strategic off-site highway infrastructure could be funded through CIL. This approach provides the greatest certainty of delivery of transport mitigation.

### Parish and Town Councils

Hollesley Parish Council wish to see the Local Plan give a clear stance on Enabling Development and for that stance to include full disclosure to Parish and Town Councils of all sites under consideration, whatever stage of the process they are at.

Ufford Parish Council highlight that the stretch of the A12 from Ufford to Seven Hills Interchange is often congested for many hours in the day and know of local businesses who are experiencing much greater costs due to this situation.

Tunstall Parish Council would like to see a specific policy on Enabling Development. Any policy must insist on extensive local consultation and a significant benefit to the location where the Enabling Development is permitted, not for the benefit of a wider community or location.

Kelsale-cum-Carlton Parish Council highlight a number of queries and issues in relation to the transport modelling evidence. Suggest that impacts of “all year round tourism, expanding Carlton Meres Holiday Park and other developments are taken into account in the model. Parish Council

also consider that a number of omissions need to be corrected in the model to understand the true picture.

Kelsale-cum-Carlton requires that the plan should include specific reference to the need for high quality and reliable broadband and mobile services, the Council can not ignore these elements. Provision of open space on new developments is critical for health and wellbeing of residents. Concerns raised in relation to secondary school provision, water recycling and wastewater network and protection of natural habitats across the District.

Kelsale-cum-Carlton consider it would be reassuring for a brief example to be given to illustrate exceptions for enabling development. Concerned that provision is being highlighted for a procedure that could be used to circumvent the provisions of specific policies in the plan.

Sudbourne Parish Council understand that provision will apply equally to new “cluster” developments or exception sites. What pressure can be brought to bear on national providers in these cases?

Sudbourne Parish Council highlight that the District Council needs to be clear about Enabling Development and what the interpretation of this in light of the NPPF. Section should include reference to Historic England’s comprehensive and authoritative guidance on Enabling Development would be very welcome.

Felixstowe Town Council support the aspiration of the policy, however it is essential that new housing developments should have their own green space. Housing development will increase demand on local services which could be upgraded to improve the premises and number of doctors.

Eyke Parish Council highlight that an increased population across the District will put significant added pressure on services already struggling to provide adequately for residents.

Leiston Town Council highlights no mention of rail link to be provided between Saxmundham and Leiston. No mention of increased pressure new homes would add to the evacuation plan for Sizewell – this is particularly apposite for Saxmundham where the road infrastructure has reached breaking point already and needs to be addressed.

Bawdsey Parish Council note that paragraphs 3.64 and 3.66 are valuable and important statements and that it would be helpful to include an example within paragraph 3.67.

Peasenhall Parish Council express concern about the ability of current infrastructure to cope with the new large development proposed in the draft plan. County Highways and utility companies need to properly plan and implement improvements prior to development taking place.

Snape Parish Council stress how fundamental the infrastructure associated with development in Saxmundham, Leiston and Aldeburgh is. Villages like Snape are impacted by increased traffic, increase demand on health, social care and education services. To that end the Parish Council feel that infrastructure needs to be in place prior to any development taking place.

Hacheston Parish Council comment that there needs to be upgraded water supply network infrastructure to cope with ongoing proposed development.

## Other organisations

Westover Landscape is unclear as to how developers will make contributions towards open space through CIL and is this in line with the former SP17?

Suffolk Constabulary request reference to “police facilities” is added to paragraph 3.56.

Suffolk Preservation Society object to the definition of enabling development as the NPPF does not include sports facilities and flood defences. NPPF defines enabling development solely to heritage assets.

Anglian Water are supportive of Policy SCLP3.6.

Department for Education support Policy SCLP3.6 but recommend strengthening the policy by referring to the potential need to manage the delivery of infrastructure with the phasing of development to ensure that the necessary infrastructure is delivered at the right time to meet the needs arising from development.

Department for Education highlight that the Final Draft Plan should seek to clarify requirements for the delivery of new schools, including when it is anticipated that they should be delivered to support housing growth. It is important to provide clarity to developers, but also retain a degree of flexibility about site specific requirements for schools.

Department for Education welcomes identification of s106 and CIL as key funding sources for new schools. Expectation is that developers should fund all the school places needed to meet the needs generated by their development in accordance with SCLP3.6 and Suffolk County Council’s guidance on developer contributions. Infrastructure Delivery Framework should include reference to Special Educational Needs and Disabilities education provision and highlight partnership work with Suffolk County Council to ensure that the forecast needs are properly planned for and costed as part of viability assessments into the Local Plan.

Home Builders Federation highlights that the Council will need to establish CIL and s106 requirements within the Local Plan and not look to bring forward additional costs after adoption. The Council will need to review CIL and it is important that this review takes place as part of the preparation of the Local Plan in accordance with the approach set out in the NPPF and the Planning Practice Guidance. The Council may also need to consider where further flexibility can be provided in other policy areas to enable developers to maximise viability in order to accommodate affordable housing and other planning contributions.

## Developers/Landowners

Strutt & Parker acknowledges the provision of open space and highlight that Policy SCLP3.6 and supporting text reflect national guidance, emphasising the importance of local policies reflecting the need to supply appropriate infrastructure as identified in NPPF paragraph 20.

Pigeon Capital Management highlight that local planning authorities should identify what infrastructure is required to support development during the plan period through the preparation of an Infrastructure Delivery Plan which will involve working with neighbouring authorities on cross

boundary issues. For this to be done effectively there needs to be an appropriately worded strategic policy supported by appropriate evidence.

Ipswich Town Football Club welcome reference to enhancement of sports facilities as enabling development. This should also make reference to University facilities. Important consideration for sports and education hub proposals being promoted by Ipswich Town Football Club.

Churchmanor Estates not reference to offsite infrastructure generally being funded through CIL but are concerned that all types of onsite infrastructure might be secured through s106. Better clarity needs to be provided on this important area that needs to be subject of consultation and discussion prior to the Plan being progressed to pre-submission stage.

Aldeburgh Golf Club support the section on enabling development.

Gladman Developments outline that it is important for the Local Plan to take a positive approach towards supporting infrastructure needs of the area. Additional information on the proposed CIL review and associated charges would be welcomed alongside whole plan viability in due course.

### **Members of the Public**

Support:

None received

Objection:

Concerned about the broad coverage of enabling development in the plan. It should be strictly within the NPPF and not stretched to include other desired local amenities for which funding is short.

Object to additional housing proposed in South Saxmundham and Benhall as the potential improvements to infrastructure in the area is not guaranteed.

Curiously there is no policy connected with the section on Enabling Development and the Council's interpretation of the NPPF as permitted development in these circumstances is not secure. The difficulty is that there is a vacuum in both National and Local Planning Policy and the promise that it will be kept under review is not good enough. The Local Plan should include its own policy on enabling development.

The local road network should be taken into account. The villages of Easton, Kettleburgh and Brandeston lie on narrow undesignated twisting roads between Wickham Market and Earl Soham which is becoming increasingly busy.

Concerned that the present levels of new housing development to not take into account increasing strain on local schools, Ipswich Hospital, elderly care, public utilities, refuse disposal and local road network.

Felixstowe is on the already crowded peninsula. How can anybody think that ongoing growth here is sustainable. We need to be protecting what little remaining green space we have.

The Council should use Section 106 to deliver infrastructure, trees and paths.

Observation:

In Saxmundham there is no current requirement for additional school places, the existing water infrastructure is in crisis with many residential homes in South Entrance experiencing flooding of the existing sewage network.

Hope and believe it has now been accepted that CIL is not the answer to all infrastructure issues. Kesgrave's infrastructure is creaking and the community needs time to mature and settle, only then will it be able to address infrastructure issues such as deficiency in playing fields.

Enabling Development is being promoted for the sustainability of Foxhall radio station, but this would mean the end of a unique heritage asset. Radio station and museum are valuable community assets, part of Kesgrave's identity.

Greater emphasis should be put on roads/access being an integral part of all current and future planning. Consideration should also be given to utilities, schools, medical, community rooms and recreational areas.

Road development must focus on Ipswich and the A12/A14 interchange alongside an inner bridge in Ipswich.

The A12 north of Ipswich up to Saxmundham is identified as significant growth area in the Local Plan, but has existing "pinch points" but very little is said about the impact of Sizewell C and the potential Park and Ride sites associated with that development.

There needs to be greater detail and clarification in the Plan, especially infrastructure and transport.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan has been updated in response to comments received from statutory consultees where appropriate. Comments in respect of site specific infrastructure provision have been included within individual site allocations and the Infrastructure Framework.

Comments received from town/parish councils have been noted accordingly and where they relate to specific text these comments have been actioned. The text which focuses on enabling development has been amended but it is not considered appropriate to have a specific policy on this. Examples are available across the District, but as each case needs to be considered on its merits it would not be appropriate to include specific examples within the Local Plan.

Reference to police facilities has been added to the Final Draft Local Plan and the Council has commissioned evidence on Whole Plan Viability which will provide a basis for the consideration of CIL charges across the District. The supporting text has also been updated to reflect the evidence base as well as the relationship between CIL and s106 contributions over the plan period.

As a result of the comments received, the infrastructure requirements within the Final Draft Plan have been justified further in response to site allocations and area specific strategies. Site specific comments or comments in relation to topics such as the chosen spatial distribution, road

infrastructure and community facilities are covered in other parts of the Local Plan.

## 4. Economy

### Policy SCLP4.1 Employment Areas

Total comments	Support	Object	Observation
8	2	3	3

#### Statutory Consultees

Historic England have outlined that owing to limited capacity they have not reviewed this chapter.

#### Parish and Town Councils

Kelsale-cum-Carlton are concerned that despite the emphasis on business growth, the plan sees that just one new employment opportunity per day has been created, despite the district hosting some significant employers at Port of Felixstowe, Adastral Park and Sizewell.

Kelsale-cum-Carlton suggests that the Council commission research to examine high correlation businesses and business sectors attracted by specific attributes of Suffolk Coastal. With this evidence it would be possible to test the market fully and understand the cost/benefits of generating a fully rounded business sector. Fast, high quality and reliable digital infrastructure is now necessary for all businesses in the district.

Felixstowe Town Council supports Policy SCLP4.1.

Bawdsey Parish Council consider that Chapter 4 is generally well expressed, but question what constitutes an adverse impact on landscape or the AONB as detailed in Policy SCLP4.2 and SCLP4.3. Examples would be useful.

#### Other organisations

Aldeburgh Society recognise the immense amount of work on the Local Plan and support policy on Employment Protection.

#### Developers/Landowners

Langmead are concerned that agriculture is not identified as a main economic driver within paragraph 4.1 and that an additional policy is needed to properly support the development of agriculture in the district. Existing policy DM15 is in accordance with the NPPF and the emerging Local Plan needs to contain a policy similar to DM15.

Artisan PPS Ltd object to the omission of the Crown Nursery site in Ufford as an existing employment site. Wording of policy SCLP4.1 needs to be expanded to include sites and not simply restricted to premises.

Churchmanor Estates support in part the content of Policy SCLP4.1 but consider the provision of “other ancillary uses” to be much too narrowly drawn. Suggest that uses should be defined as

“functionally related” and have the primary purpose of providing a service to the businesses operating on that employment area.

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of policies. The NPPF (2018) requires employment policies to be flexible enough to accommodate needs arising over the plan period.

### **Members of the Public**

Support

None received

Object

Operations related to the Port of Felixstowe should be within existing land as they have already expanded on several occasions. There should not be any strategic areas allocated close to the A14, as the port is no longer growing and under threat from other ports. The A12/A14 junction is already overly congested.

The Council is in serious danger of killing the golden goose if large unfettered development comes forward which will destroy everything residents and visitors love about this special area. Impact of Sizewell C will be large with expensive build and minimal job creation.

The Local Plan in some forms will not see an increase in jobs but a change in job types. Employers need to be forced to pay people more money with increases to minimum wages and reduction of zero hours contracts. Drivers of our economy in the region are all facing issues and hauliers do not need to be in the area as the railway carries over 1 million teu's.

Observation

Schools overcrowded no guarantee of infrastructure, doctors oversubscribed, population increase is absurd, increased pollution, no impact analysis, drainage and sewerage is already a major issue, who will occupy the houses, police station is closed.

Lack of a range of major employers mean that many have to search further afield for employment. Projects proposed do not add substantially to long term employment opportunities. To what extent is there a case for apprenticeship/trade learning schemes across the district?

There should be a development of an apprenticeship/trade learning centre in Saxmundham or Leiston.

### **How these comments have been taken into account in the Final Draft Local Plan:**

This section in the Final Draft Local Plan has been comprehensively re-written and restructured. Policy is now called Existing Employment Areas.

The Final Draft Local Plan seeks to provide a positive approach to increasing employment and

economic opportunities across the District through increased productivity and business growth over the plan period.

As evidence to support the Local Plan, the Council has commissioned analysis and scrutiny of the various business sectors with a significant presence in the District through the Employment Land Needs Assessment in the Final Draft Local Plan evidence base. The Final Draft Local Plan includes a dedicated policy supporting the provision of digital infrastructure (Policy SCLP8.4 in the Community Facilities Section).

Site allocations for new housing, employment and infrastructure development in the Final Draft Local Plan policies strictly control housing and commercial development outside towns and villages focusing land use in the countryside on agriculture and other land based businesses. Policy SCLP4.7 'Farm Diversification' provides an approach to development that diversifies the rural economy in the context of change in the agriculture sector.

The policy is focused on locations in business, industrial, storage and distribution use (planning use classes B1, B2 and B8) rather than horticulture, but the supporting text acknowledges the role of rural areas and the agricultural sector across the District.

Employment and site allocation policies are amended to reflect appropriate functionally related and ancillary development.

The Final Draft Local Plan sets out a plan led approach to guide the nature and location of growth in the District whilst protecting its special environmental qualities which the supporting text to the economy policies recognises as underpinning the local economy.

As well as employment growth, the economy policies support productivity growth so that residents can move from lower paid to better paid employment and self employment. This is outlined in paragraph 4.2 in relation to the Government's Industrial Strategy.

## Policy SCLP4.2 New Employment Areas

Total comments	Support	Object	Observation
11	3	4	4

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton note that there are no employment areas within settlement boundaries.

Felixstowe Town Council supports Policy SCLP4.2 but requests that there be a much more significant analysis of the strategic needs of the Port.

### Other organisations

Suffolk County Council AONB Team suggest that a new criterion should be added to Policy SCLP4.2 to read “It would not have a significant adverse impact on the Suffolk Coast and Heaths AONB or its setting, Heritage Assets of internationally designated sites.”

### Developers/Landowners

Quod support Policy SCLP4.2 but seek further clarification to define what “appropriate to the scale of the settlement” means in practice, in order to ensure that the bringing forward of employment space outside of Employment Areas is demonstrated to be supported to be viable in the local commercial market.

Artisan PPS Ltd indicate Policy SCLP4.2 is too restrictive and doesn’t adequately reflect the reality of employment land delivery in a rural context. Sites come forward for a variety of reasons which vary over time as one business use ceases to become viable and another surfaces and Local Plan policy should not stifle this happening. Provided sites do not give rise to environmental impact or other adverse consequences initiatives to create jobs should not be thwarted.

Site 177, the former nursery site at Yarmouth Road is being promoted by the landowners as a site for either employment uses, housing or both. The site has a long history of horticulture and has various greenhouses and other redundant buildings. Site is well placed for access to the A12 and will provide employment opportunities.

Sites 908 and 909, land east of the A12 and Yarmouth Road, Ufford are being promoted by the landowners as mixed use sites. Site is ideally located to the A12 and could provide mixed use allocation in the Local Plan for residential, commercial, sports pitches and open space.

Churchmanor Estates support policy SCLP4.2 but suggest amending “ancillary” to “functionally related” and the addition of “and the local area” to the end of the first paragraph. The Plan led system should be about creating certainty rather than allowing provision through an ad hoc process of unplanned provision.

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of policies. The NPPF (2018) requires employment policies to be flexible enough to accommodate needs arising over the plan period.

Savills question the overall employment strategy and the potential allocation of Innocence Farm. It is considered that the allocation is too large and has been over estimated. Highlight an alternative site which is also well related to the Port of Felixstowe and the A14 but is better placed in respect of land size to meet needs over the plan period.

### **Members of the Public**

Support

None received

Object:

Land is already available within the Port of Felixstowe and surrounding area and the proposal for additional land at Innocence Farm would destroy yet more prime agricultural land and be a blot on the landscape.

Land at Innocence Farm is not needed, if it was it is on the wrong side of the A14. Land at Walk Farm would be better suited if needed.

Innocence Farm is a unbelievable proposition, it will have an adverse impact on surrounding land and there is other land available to accommodate.

In relation to the need for employment land associated with the Port of Felixstowe, the 'central case' scenario seems more balanced although should consider the decline and levelling of market share since 2014. It is queried why an uplift has been applied to the land requirements when this has not been done in previous Lichfields reports. The uplift for ancillary uses appears high as many ancillary uses would be accommodated within the warehousing uses. Evidence from operators that they would prefer closer sites for economic efficiencies does not justify decreasing the 30 mile radius identified in the needs assessment. There are other sites on major road junctions that would help to address this. There has been no allowance for contribution from existing permitted sites. The 2017 Economic Needs Study indicates a decline in B1c and B2 uses which suggests an opportunity for B8. It is likely that the Logistics Park will be delivered. Around 22.3ha is need when taking the above into account. This could be accommodated in sites 347 / 1149.

Observation

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

This section in the Final Draft Local Plan has been comprehensively re-written and restructured. Policy is now called New Employment Development.

The employment area at Carlton Park is outside the Kelsale settlement boundary. Other employment areas such as former airfields tend to be outside settlement boundaries but some employment areas are within settlement boundaries where they are part of the contiguous built fabric of a town or village.

The Final Draft Local Plan evidence base includes a dedicated Port of Felixstowe Growth and Development Needs Study. Matters around the appropriate scale of employment land provision for Port related requirements are addressed in policy SCLP12.35: Land at Innocence Farm.

Policy amended to include wording suggested in relation to the Area of Outstanding Natural Beauty.

Policy SCLP4.5 'Economic Development in Rural Areas guides employment development in accordance with the settlement hierarchy. Policy SCLP4.7 'Farm Diversification' provides an approach to development that diversifies the rural economy in the context of change in the agriculture sector. Area specific policies identify a range of existing and new employment areas at towns, close to the Port of Felixstowe and at established airfield sites.

The former nursery site at Yarmouth Road has been assessed in the Strategic Housing and Employment Land Availability Assessment and upon consideration with other alternative sites is not one of a range of sites selected for allocation to provide a portfolio of sites to meet the employment land evidence base and the ambitious spatial strategy for employment growth.

Employment and site allocation policies are amended to reflect appropriate functionally related and ancillary development. This includes policies Policy SCLP4.2 'New Employment Development' and SCLP12.20 'Land at Felixstowe Road'.

The range of policies in the economy section provide a suitably responsive land use approach to support the Economic Growth Strategy for Norfolk and Suffolk consistent with the National Planning Policy Framework (2018). The policies are linked to a supporting economic evidence base.

## Policy SCLP4.3 Expansion and Intensification of Employment Sites

Total comments	Support	Object	Observation
8	2	2	4

### Statutory Consultees

Suffolk County Council highlight that adverse impact on the highway is not necessarily consistent with the NPPF. It is not reasonable to prevent development because of any adverse impact on the highway network. As such it would be preferable to have reference to “severe impacts” or to clarify what level of adverse impact is sufficient for preventing development in Suffolk Coastal.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council highlight the issues in respect of the Carlton Park Industrial Area and the proximity of this employment site to a Primary School and residential areas. Any expansion and/or intensification of the employment site which leads to increased traffic movements would require significant re-engineering of the immediate road network and environs to mitigate the danger to school children and parents, elderly residents, people of limited mobility, care services visiting the area.

Felixstowe Town Council supports Policy SCLP4.3.

Martlesham Parish Council highlight that the Martlesham Heath Retail and Business areas do not offer scope to extend outside of the physical limits although the plans for Brightwell Lakes include the possibility of commercial development. The Local Plan should be clearer about what is meant by “intensification”. Intensification should not relate to density of buildings but regard to number and quality of jobs created which is in line with the Martlesham Neighbourhood Plan’s vision.

### Other organisations

None received

### Developers/Landowners

Code Development Planners comment that policy SCLP4.3 should give encouragement and clarity to expansion and intensification of opportunities on the existing employment site of Adastral Park and Brightwell Lakes. Adastral Park provides significant opportunities supported by a plethora of micro and small businesses and self employed persons as emphasised by paragraphs 80-82 of the NPPF. Policy SCLP4.3 or an additional policy should give clarity that an expansion and intensification of employment at Adastral Park and Brightwell Lakes will be encouraged.

Artisan PPS Ltd outline that the policy does not identify any means of qualification as to what constitutes an existing employment site, how will any decisions be calibrated?

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of

policies. The NPPF requires employment policies to be flexible enough to accommodate needs arising over the plan period.

### Members of the Public

Support

None received

Object

Concern about the use of prime agricultural land for employment uses where brownfield sites are available. Cannot see how westbound access to the A14 can be achieved from Innocence Farm and the site is vulnerable to the close of the Orwell Bridge. Innocence Farm will bring air, light and noise pollution in an area particularly close to Trimley St Martin Primary School.

Observation

None received

### How these comments have been taken into account in the Final Draft Local Plan:

This section in the Final Draft Local Plan has been comprehensively re-written and restructured. Policy is now called Expansion and Intensification of Employment Sites.

The First Draft Local Plan is subject to and informed by cumulative highways modelling.

The policy includes criteria relating to local environmental sustainability, highways and amenity impacts.

The policy is applicable to changes of use as well as new or extended buildings. The nature of the use as well as the scale of the physical premises is therefore assessed against the policy. The supporting text provides context to intensification such as proposals to expand, alter or make productivity enhancements to existing employment premises. All established and allocated new employment areas are important to the District's diverse economy because they are interrelated in serving and supporting the wider economy. The policy approach is not to determine business proposals for expansion and intensification of sites on the basis of the number and nature of jobs created.

As well as this policy, policies SCLP4.1 'Existing Employment Areas' and SCLP4.2 'New Employment Development' together with other Local Plan policies facilitate positive consideration of economic development opportunities related to Aadastral Park. Paragraphs 3.13 and 4.7 recognise the particular importance of BT Aadastral Park to the economy. Policy SCLP12.18 'Strategy for Communities Surrounding Ipswich' states that economic proposals which are well related to the strategically important employment areas will be supported where they maximise provision and support the diverse range of opportunities in the area in accordance with other policies in the Local Plan.

Locations shown on the policies maps as existing and new employment areas are covered by the policy as well as other existing sites and premises within employment use classes B1 (business), B2 (general industrial) and B8 (storage and distribution) in the use classes order.

The economy policies reflect and are responsive to the Economic Strategy for Norfolk and Suffolk as

well as the East Suffolk Business Plan. They provide flexibility to address economic development opportunities and needs arising over the plan period and are consistent with supporting economic evidence base studies.

The approach to land at Innocence Farm is addressed in the site specific policy. The Local Plan strategy, policies and site allocations provide an appropriate range and choice of employment sites to support business, employment and productivity growth over the plan period.

Matters around the appropriate scale of employment land provision for Port related requirements are addressed in policy SCLP12.35 'Land at Innocence Farm'.

## Policy SCLP4.4 Protection of Employment Sites

Total comments	Support	Object	Observation
6	1	2	3

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the details of Policy SCLP4.4.

Aldeburgh Town Council outline that the continued loss of office and work space in the town is alarming and the town is now virtually dependent on tourism. Employment opportunities for local people are undermined by poor public transport and the Town Council questions the provisions of the Commercial Property Marketing Best Practice Guide.

Framlingham Town Council endorses Policy SCLP4.4 and regrets past loss of business sites to residential use in Framlingham and elsewhere.

### Other organisations

None received

### Developers/Landowners

Suffolk Constabulary - The Suffolk Constabulary Headquarters in Martlesham Heath are currently occupied but do not provide the type of employment that is covered by Policy SCLP4.4. The Police intend to vacate the site during the plan period and seek a specific residential allocation for this site within the Local Plan.

Churchmanor Estates outline that the use of the “marketing guidance” is inappropriate and burdensome in a plan led system and is contrary to paragraph 120 of the NPPF. There is a risk that employment land is unrealistically maintained which serves to add to the supply side stock and can suggest there is an adequacy that is far from real and effective.

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of policies. The NPPF (2018) requires employment policies to be flexible enough to accommodate needs arising over the plan period.

### Members of the Public

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

This section in the Final Draft Local Plan has been comprehensively re-written and restructured. Policy is now called Protection of Employment Premises.

The policy approach linked to supporting marketing guidance provides a positive approach to protecting employment sites whilst recognising viability in respect of the relationship between the nature of sites and premises and business requirements. Ground floor commercial premises in town centres are subject to town centre policies and the Final Draft Local Plan seeks to retain these units for main town centre activities..

Based on consultation responses and the increased housing requirement as guided by the Government, the Final Draft Local Plan provides a new Policy SCLP12.25 'Suffolk Police HQ, Portal Avenue, Martlesham' which provides a positive allocation to guide redevelopment proposals for the site.

The First Draft Local Plan monitoring framework provides for regular reviews of both the land allocated for development in the Local Plan, and of land availability. The policy relationship with marketing guidance as supplementary planning guidance available on the Council's website is consistent with National Planning Policy Framework paragraph 120 to inform whether there is reasonable prospect of an application coming forward for the existing or allocated use.

The range of policies in the economy section provide a suitably responsive land use approach to support the Economic Growth Strategy for Norfolk and Suffolk consistent with the National Planning Policy Framework.

## Policy SCLP4.5 Economic Development in Rural Areas

Total comments	Support	Object	Observation
13	4	2	7

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council support Policy SCLP4.5, especially item “c”.

Kelsale-cum-Carlton Parish Council regret the details of paragraph 4.26 and believe that each case will have to be considered on its merits, taking into account employment opportunities and the creation of a balance sheet of positive and negatives. An “employment at any cost” policy will not deliver the optimum solution 100% of the time and will benefit from further consideration.

Sudbourne Parish Council welcome Policy SCLP4.5, especially the emphasis on the benefits to the community that local employment brings, but it would be better if the benefits had been defined in terms of the local community in the same way as the disbenefits have been – a local community bearing the amenity costs of growth and development ought to get some of the benefits at the same scale.

Sudbourne Parish Council welcomes the commitment to appropriate development in the rural areas and specifically the AONB. Regrettably that the policy merely acknowledges the lack of public transport facilities to support small scale enterprises in the countryside. Welcome the policy requirements (a-f) but wish that the benefits be defined in terms of the local community.

### Other organisations

Suffolk County Council AONB Team suggest amendment to criteria c of Policy SCLP4.5 to read: “The design and construction do not have an adverse impact on the character of the surrounding landscape, the AONB, or harm the natural or historic environment.

The Forestry Commission state that woodfuel and timber supplies continue to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

### Developers/Landowners

Policy SCLP4.5 feels like a positive approach to allow sustainable development of small communities in the district. The development of employment opportunities within villages should be encouraged and flow from the sustainable growth of small village communities.

Langmead Group highlight that the policy does not reference new agricultural development (including structures/buildings).

FCC Environment support Policy SCLP4.5.

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of policies. The NPPF (2018) requires employment policies to be flexible enough to accommodate needs arising over the plan period.

Andrew Martin Planning are generally supportive of Policy SCLP4.5 and promote significant investment in the local economy and providing job opportunities for local residents at Manor Farm. The nature of the proposals will mean that they will complement the existing facilities in Snape Maltings.

### Members of the Public

Support

None received

Object

The construction of Sizewell C would breach all of the criteria in Policy SCLP4.5.

Proposed development of Innocence Farm should not even be considered according to Policy SCLP4.5.

Observation

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan sets out a plan led policy approach that covers strategic economic priorities, environmental and amenity considerations whilst supporting business certainty. This approach reflects that businesses are best placed to make appropriate investments and enterprise that shape the economy rather than the Council on an ad hoc basis.

The policy criteria enable the particular community context, details and characteristics to be reflected when determining a particular development proposal against the policy.

Policy wording amended to reflect the suggested approach in relation to the AONB and the historic environment.

Policy SCLP4.6 'Conversion and Replacement of Rural Buildings for Employment Use' enables farm, forestry and other land-based businesses to build the buildings and infrastructure they need to function efficiently.

The range of policies in the economy section provide a suitably responsive land use approach to support the Economic Growth Strategy for Norfolk and Suffolk consistent with the National Planning Policy Framework.

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

Total comments	Support	Object	Observation
8	1	0	7

### Statutory Consultees

Suffolk County Council highlight that the terminology in Policy SCLP4.6 may not be consistent with the NPPF. If it is the district's intention that a high bar be set in terms of employment development in rural locations, this will need to be justified and consistent with requirements placed on other forms of development in the countryside.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the details of Policy SCLP4.6

### Other organisations

Suffolk County Council AONB Team suggest the addition of criterion (f) to Policy SCLP4.6 (f) to read: "The design and construction do not have an adverse impact on the character of the surrounding landscape, the AONB, or harm the natural or historic environment."

### Developers/Landowners

Artisan PPS Ltd support Policy SCLP4.6 although it is far from clear how this policy sits alongside and complements the extensive list of permitted development rights which already exist.

Langmead outline that paragraph 4.28 outlines farm, forestry and other land-based businesses but Policy SCLP4.6 deals solely with conversion and replacement of rural buildings for employment use.

Gladman Developments outline that it is vital that policies are suitably responsive to the Economic Strategy for Norfolk and Suffolk and should provide further flexibility through the wording of policies. The NPPF (2018) requires employment policies to be flexible enough to accommodate needs arising over the plan period.

### Members of the Public

District Councillors:

Cllr Block outlines that Policy SCLP4.6 should recognise the adverse impact on special nature of the AONB/Heritage Coast or sites covered by environmental designations.

Support

None received

Observation

Section should reference wildlife protection in line with the Wildlife and Countryside Act 1981. Migratory birds return year after year and rely on sites for roosting still being available – many barn conversions have been done incorrectly and insensitively which makes species homeless.

Object

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy wording amended to be consistent with the National Planning Policy Framework and other Local Plan policies including in respect of residential amenity, highways and vehicle access.

Policy amended in relation to the Area of Outstanding Natural Beauty, landscape, natural and built environment.

Policy amended to include a criteria enabling farm, forestry and other land-based businesses to build the buildings and infrastructure they need to function efficiently.

The range of policies in the economy section provide a suitably responsive land use approach to support the Economic Growth Strategy for Norfolk and Suffolk consistent with the National Planning Policy Framework (2018). The policies are linked to a supporting economic evidence base.

Policies in the Natural Environment Section and policy SCLP9.3 'Coastal Change Management Area' address wildlife protection and impacts on the Area of Outstanding Natural Beauty and Heritage Coast of development including the conversion and replacement of rural buildings.

## Policy SCLP4.7 Farm Diversification

Total comments	Support	Object	Observation
3	1	0	2

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council support Policy SCLP4.7, but all highways aspects of schemes need to be to the satisfaction of the local residents before permission is given.

Kelsale-cum-Carlton Parish Council note the detail of Policy SCLP4.7.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

District Councillors

Cllr Block outlines that the policy should recognise the adverse impact on the AONB/Heritage Coast.

Support

None received

Object

None received

Observation

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The policy states that proposals will be supported where they do not compromise highway safety to the local road network or free flow of traffic and there is adequate off road parking.

Policies in the Natural Environment Section (Landscape policies) and the Climate Change Section (SCLP9.3: Coastal Change Management Area) address development affecting the Area of Outstanding Natural Beauty and Heritage Coast.

## Town Centres and Retail

### Paragraph 4.36 – 4.41

Total comments	Support	Object	Observation
4	0	1	3

#### Statutory Consultees

None received

#### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the details of paragraphs 4.36-4.41.

#### Other organisations

Ferry Road Campaign Group identify the changing shopping habits lead to shrinking town centres and affordable flats should be built in former retail areas to bring life back to the centres. Putting housing in peripheral estates will further destroy town centres.

#### Developers/Landowners

None received

#### Members of the Public

Support

None received

Object

None received

Observation

We need to be moving away from the dominance of car culture as emissions compromise air quality and people health. We require proper integrated public transport and cycling parking facilities. No more “out of town” retail units should be built with the car the only means of access.

#### How these comments have been taken into account in the Final Draft Local Plan:

Supporting text amended in that opportunities to encourage residential developments targeted at the provision of smaller homes and specialist housing units for younger or older people within town centres will be supported where they do not undermine the main town centre use.

The ‘Town Centre Environments’ policy (SCLP4.11) and supporting text focus on accessibility to and around town centres for pedestrians, cyclists and public transport users. It identifies particular opportunities to enhance pedestrian connectivity and legibility.

## Policy SCLP4.8 Retail Hierarchy

Total comments	Support	Object	Observation
4	3	0	1

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note that the table and narrative of Policy SCLP4.8 are neither complementary nor clear. The language used in each is different.

Felixstowe Town Council - With reference to paragraph 4.48, the Town Council asks that the District Council states here that it will work with Chambers of Commerce and similar organisations in developing concepts for the District's retail offer.

### Other organisations

None received

### Developers/Landowners

Support the position afforded to Felixstowe in the Retail Hierarchy. This is considered appropriate given its coastal resort status, visitor and tourist footfall and vitality as a town.

Montague Asset Management LLP support the policy on retail hierarchy, although it is important that the hierarchy is not used a blunt instrument in decision making.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The retail hierarchy is included as part of the New Retail and Commercial Leisure Development' policy for clarity in terms of its role in Final Draft Local Plan retail policies.

The policy scope does not extend to Council actions that are broader than its planning function.

## Policy SCLP4.9 New Retail Development

Total comments	Support	Object	Observation
10	2	1	7

### Statutory Consultees

Ipswich Borough Council – Support directing retail development to town centres first, edge of centre sites second and thirdly to out-of-centre locations. Recommend that either within the text of policy SCLP4.9 or in the retail hierarchy of policy SCLP4.8 that Ipswich is included as a defined Town Centre. Out-of-centre retail and leisure developments in locations outside the IBC boundary, such as Martlesham, can have significant impacts upon its vitality and viability and it is important that suitable or available sites within Ipswich Town Centre are explored as part of this, where appropriate. It would be sensible that the floor space impact threshold for impact assessments for out-of-centre sites is expanded to include Ipswich as a settlement centre and that the higher 750sqm gross threshold is applied.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the details of Policy SCLP4.9.

Felixstowe Town Council - Welcome the requirement for significant retail planning applications to provide an impact assessment to protect the vitality and viability of the town centre. Developments should also consider sustainable public transport and cycle links. In the ever-changing retail landscape, policies should be flexible enough to encourage innovation and contribute to an overall sense of place to ensure that residents are provided a wide range of high-quality local retail and leisure offers which minimise the need to travel out of town. New retail developments in town centres and other retail centres should consider the impact on parking provision. Car parking policies, which should be designed with the customer in mind, must prioritise good value, short-stay, convenient access to shops and leisure facilities.

### Other organisations

Woodbridge Society support the recognition of the need to protect town centres from damaging out of town retail developments.

### Developers/Landowners

Sainsbury's Supermarkets suggest that a threshold of 750sqm gross should be applied to areas outside of those identified in Policy SCLP4.9, instead of the NPPF standard threshold of 2,500sqm.

Strutt & Parker on behalf of Suffolk Coastal District Council outline that it is important that more flexibility is allowed for uses above 750sqm in Felixstowe. The Local Plan should look to allocate sites for public leisure provision, helping to steer retail and leisure development to sites with opportunity to deliver high quality leisure and retail to new and existing communities. Consideration

should be given to the opportunity to unlock existing sites and look to redevelop the sea front leisure centre should this be relocated as part of the Felixstowe Garden Neighbourhood.

Montague Asset Management LLP outline that the approach in Policy SCLP4.9 should be to “permit” development subject to relevant criteria or tests being met. Important to reflect the operation of sequential test through a series of preferences. Criteria a and b therefore need reflect the preference rather than a rejection in the absence of such a preference. The policy would then be consistent with the NPPF. Therefore advocate default threshold for Felixstowe and Woodbridge to be 1000m<sup>2</sup> for the remaining level 2 centres.

### Members of the Public

#### Support

None received

#### Object

None received

#### Observation

The relocation of leisure centre facilities in Felixstowe will bring traffic, noise and pollution into the area, which will have a significant adverse impact on the surrounding area.

Out of town shops are already here and here to stay. Felixstowe town centre needs to have the basics and has already, clothes, food, hardware, books, stationary, shoes. It now needs to evolve to residential use, leisure and service outlets. The pedestrianised area is wonderful. Cafes are thriving which is great for community spirit. Dentists, doctors, chiropodists, vets, hairdressers, beauty salons, chemists should be encouraged along with some units returning to full residential use. The architecture of Hamilton Road needs to be preserved.

This said public transport to 'out of town' shops should be made available at very low cost or free of charge. The cost should be subsidised by council and the shops. The council gave permission to these out of town shops causing the loss of some high street shops so the council should now help people to reach them. The out of town shops are benefitting from the out of town facilities and want the footfall so should also subsidise the bus links to cut down on car usage.

#### How these comments have been taken into account in the Final Draft Local Plan:

Policy amended to include Ipswich in the sequential approach and 750m<sup>2</sup> impact thresholds.

The supporting text is positive about innovation in the changing retail context. This includes integrated of premises and relationships with internet shopping and changing storage and showroom functions.

The Final Draft Local Plan is reflecting regeneration opportunities in relation to the existing seafront leisure centre site and potential for new indoor leisure provision in the policy for the Felixstowe Garden Neighbourhood.

The Transport section of the Final Draft Local Plan addresses car parking.

The impact threshold applies to retail development proposals in locations outside the places listed where there is potential for the proposal to cause adverse impact on centres in the Retail Hierarchy. The introductory paragraphs to the section emphasise retail relationships and networks between centres.

## Policy SCLP4.10 Development in Town Centres

Total comments	Support	Object	Observation
6	1	2	3

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note to content of Policy SCLP4.10

Felixstowe Town Council support the policy.

### Other organisations

Ferry Road Campaign Group outline that town centres need to shrink to reflect modern shopping habits and retail areas redesignated as housing.

The Aldeburgh Society add that the existing town centre policy restricting change of use of premises from shop/offices to residential accommodation which inevitably end up as holiday homes should be more strictly adhered to.

### Developers/Landowners

Policy SCLP4.10 makes no reference to the suitability of town centres to accommodate residential development. Paragraph 85 of the NPPF recognises that residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.

Montague Asset Management LLP are generally supportive of the approach that the emerging plan is taking towards the management of town centres and retailing. However there are sectors of the community who are to a greater or lesser extent excluded from having access to such facilities whether due to reliance on public transport or otherwise.

### Members of the Public

Support

None received

Object

None received

Observation

More consideration should be given to how Felixstowe Town Centre develops over the plan period, there is opportunity for the Council to take a radical approach to the future of Felixstowe Town Centre and consider the reallocation of commercial premises/land for the building of affordable homes instead. There is land available within Felixstowe (such as railway station and post office) and the Council needs to take a radical approach.

**How these comments have been taken into account in the Final Draft Local Plan:**

The policy approach is to consolidate rather than grow or contract town centres reflecting Local Plan evidence in the Retail and Commercial Leisure Town Centres Study that whilst forecast retail floorspace growth is very modest, Suffolk Coastal Town Centres are healthy and stable. Ground floor units are to be retained for main town centre uses with residential uses accepted and encouraged on upper floors.

Supporting text amended in that opportunities to encourage residential developments targeted at the provision of smaller homes and specialist housing units for younger or older people within town centres will be supported where they do not undermine the main town centre use.

The Local Plan evidence base including the Retail and Commercial Leisure Town Centre Study and available sites in the Strategic Housing and Employment Land Availability Assessment do not identify a baseline context to warrant a radical policy approach to promote profound change in terms of the reallocation of commercial premises/land for the building of affordable homes. Land at Felixstowe Railway Station has not been made available in the Strategic Housing and Employment Land Availability Assessment but is within the town centre policy boundary and therefore appropriate redevelopment opportunities could come forward over the plan period.

## Policy SCLP4.11 Town Centre Environments

Total comments	Support	Object	Observation
8	2	1	5

### Statutory Consultees

Suffolk County Council supports improving the pedestrian environment of town centres and improving access to town centres for pedestrians and cycles. There is significant evidence to show the value of pedestrian-friendly environments to the vitality and viability of town centres. Shared Space while this work takes place - the Department's website will be updated to reflect this. All public realm schemes should be inclusive and accessible and request to pause the introduction of new shared space schemes." This situation will need to be monitored as the Plan is developed and implemented.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council observe that a piecemeal approach is unlikely to bring about the required regeneration and/or transition required. Without further initiatives and accompanying investment it is unlikely to deliver a huge influx of people and/or economic prosperity. The Plan seems devoid of substantive ideas beyond the traditional town planning motherhood and apple pie.

Felixstowe Town Council broadly supports this policy and requests that the opportunity to enhance links between town centres and other local points of interest (for example, between Felixstowe's town centre and seafront) be clearly outlined here. A minor change to the final sentence is requested as follows: "The expansion of Shared Space and Dementia Friendly areas will be supported where proposals maintain active town centre frontages without unduly compromising highway access, vehicular and pedestrian movements.

Martlesham Parish Council request clarification what legible means in this context.

### Other organisations

Woodbridge Society - In Woodbridge, there needs to be recognition of the development of new secondary shopping areas near the Whisstocks site which are not yet reflected in the town centre. The continuing shortage of parking in Woodbridge needs to be addressed.

### Developers/Landowners

None received

### Members of the Public

Support

None received

Object

None received

Observation

Maybe not build so many houses in Felixstowe and the surrounding villages so that it is safe for pedestrians, cyclists and holidaymakers to move around freely, it is already a congested town and area.

Policy SCLP4.11 is very laudable but need to enforce the existing no car zone times in Woodbridge. Council needs to get act together and make sure this is policed as well as parking penalties are enforced.

**How these comments have been taken into account in the Final Draft Local Plan:**

Text amended in relation to dementia friendly areas and shared space.

The Whisstocks site in Woodbridge is outside the town centre boundary and retail development at this location would reflect its nautical, tourism and residential context as permitted.

The Local Plan is required by Government to meet objectively assessed requirements for new homes. The retail and town centre policies promote improvements to accessibility to and around town centres into that their popularity does not become a congestion deterrent to visiting them.

Policing and enforcement of car parking zones are not within the scope of the Final Draft Local Plan.

## Policy SCLP4.12 Retail in Martlesham and Kesgrave

Total comments	Support	Object	Observation
7	3	1	3

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the content of Policy SCLP4.12

Martlesham Parish Council - Due to its proximity the viability of the Martlesham Local Centre (branded as The Square) is uniquely vulnerable to loss of trade to the nearby national businesses operating in the Retail Park. For many residents The Square is useful for convenience shopping, and for older residents it is more of a lifeline (surprisingly Martlesham's age profile is older than for Suffolk Coastal as a whole). The Square's current vibrancy benefits from the symbiosis between the mix of retail, including a convenience store and Post Office, a butcher/baker's, a surgery, pharmacy and a dentist. Nearby there is a church and a pub. It really is at the heart of Martlesham Heath. Welcome the reference in SCLP4.12 to only permitting out of centre retail uses (in the Retail and Business Park) where it "would not have a significant adverse impact on centres in the retail hierarchy including, but not limited to, The Square, Martlesham Heath". We would need to rely on Suffolk Coastal's professional planning expertise to define a method for putting such a policy into practice, and look forward to working with you on this as appropriate.

Also in relation to SCLP4.12 where it says: Where development is considered acceptable in terms of the town centre sequential and impact tests proposals, it should make a positive contribution towards improving: Please add to the list shown:

1. safe non-car access to and within the Martlesham retail park from nearby existing and planned residential areas.

### Other organisations

None received

### Developers/Landowners

Policy should allocate two parcels of land owned by Tesco Stores Limited in Kesgrave District Centre for a range of different uses, including retail, residential and commercial uses. The NPPF (paragraphs 68 and 85) support the development of such sites and it is appropriate for the Local Plan to guide future development on these sites.

On behalf of the owners of The Square, Martlesham Heath we support any policy which promotes the sustainability and viability of the vital village centre known as The Square. We do not believe the proposed Policy SCLP4.12 Retail in Martlesham and Kesgrave goes far enough to protect against

adverse impacts from adjoining sites, in particular, Martlesham Heath Retail Park whilst protecting the current retail uses at The Square. We would suggest that the uses are widened to include any uses which impact on the vitality and viability of the uses in Martlesham Heath (The Square) such as the much valued Doctors Surgery, independent pharmacy and other independent businesses, and supports the expansion of the existing facilities at The Square, in particular the Doctors' Surgery.

### **Members of the Public**

Support

None received

Object

Do not see how Kesgrave relates to this policy – important that small plots of land near existing Tesco remain designated in their current mixed use and do not become entirely residential.

Observation

Proximity of Woodbridge should be added to the list of areas considered under “adverse impact” of any future development.

### **How these comments have been taken into account in the Final Draft Local Plan:**

Policy and supporting text amended to include safe non-car access to and within the Martlesham retail park from nearby existing and planned residential areas.

The District Centre boundary on the policies map and the District Centre policy facilitate the identified development opportunities at Kesgrave.

Policy amended to include adverse impact on centres in the retail hierarchy including, but not limited to, the Square in Martlesham Heath, Woodbridge, Felixstowe and the regional town centre of Ipswich.

Policy changed from Martlesham and Kesgrave to just Martlesham.

## Policy SCLP4.13 District and Local Centres and Local Shops

Total comments	Support	Object	Observation
7	1	2	4

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the content of Policy SCLP4.13

Wickham Market Parish Council support Policy SCLP4.13 but consider it should be strengthened. Welcome the text in relation to historic shop fronts but there should be more encouragement for retention of retail units, commercial uses. District Centre boundary in Wickham Market should be extended to include care home at Lehmann House.

Felixstowe Town Council support the policy.

Westerfield Parish Council outline that Policy SCLP4.13 should be expanded to encourage new local shops where it is economically viable. Where there is justification in having a local community shop, the Local Plan should encourage this in some way.

### Other organisations

None received

### Developers/Landowners

Policy makes no reference to the suitability of district centres to accommodate residential development as outlined in NPPF paragraph85. Tesco previously submitted land in the Kesgrave district centre and the local plan should provide policy to guide the future redevelopment on this land. Unsure as to whether the district centre boundary is drawn accurately on the Proposals Map. It incorrect, it should be aligned to the eastern edge of Tesco's land.

### Members of the Public

District Councillors

Cllr Block outlines that no list of "local centres" is given. If a local centre equates to a large village on the settlement hierarchy list do not and could not sustain more than a single shop. No correlation between local centres and large villages needs to be explained.

No other comments received

**How these comments have been taken into account in the Final Draft Local Plan:**

The policy approach for District Centres applies to a diverse range of village and suburban centres. It is therefore flexible in relation to retail and local services having regard to change and competition in the retail and sector and relationships between centres.

The Care Home at Lehmann House is not understood to incorporate main town centre uses or services so remains outside the boundary as a specialist housing land use, although this could be an issue that the Wickham Market Neighbourhood Plan may consider.

The supporting text has been amended to highlight support for new shops, services and tourism uses within the settlement boundaries. Many of these fall within the definition of community facilities which is outlined under Policy SCLP8.1 'Community Facilities and Assets'.

Local and district centres are now listed in the supporting text.

## 5 Housing

### General comments

Total comments	Support	Object	Observation
8	0	3	5

#### Statutory Consultees

Historic England comment that owing to time they have not reviewed this chapter

#### Parish and Town Councils

Kelsale-cum-Carlton Parish Council state that paragraphs 5.1 – 5.3 are noted.

Bawdsey Parish Council comment that it is generally effective and well thought out with useful references to affordable housing and scale of development.

#### Other organisations

Aldeburgh Society is pleased to see definitions of infill and garden development, clusters and annexes however state that a proper definition of affordable housing is needed.

East Suffolk Liberal Democrats object on the basis that the Plan does not take into account the Common Tenancy Strategy which includes a definition of affordable being 25% of an individual's full income and some helpful guidelines around tenure mix and use of Section 106 agreements.

#### Developers/Landowners

Christchurch Land and Estates comment that the Local Plan is not addressing full housing need (including the need for extra care accommodation), is proposing to allocate sites in the AONB which is contrary to paragraph 172 of the NPPF and that the Sustainability Appraisal is fundamentally flawed. They comment that the involvement of the Council in the Ipswich Strategic Planning Area is welcomed. With the publication of the new 2016 based household projections, the base date for the Local Plan should be 2016. It is likely that housing need in Suffolk Coastal will increase. Whilst not part of the methodology, the Council should consider the extent to which vacant and second homes should result in an increase to the figure. The Council should also assess the extent to which the housing figure will meet jobs growth. It should not be assumed that a 10% increase will adequately deal with these issues. The extent to which the 10% contingency is adequate given the reliance on larger allocations must be subject to further review. Additional sites should be allocated. There is no strategy regarding specialist homes for the elderly and the Council is therefore reliant on speculative applications. Every effort should be made to allocate sites outside of the AONB.

#### Members of the Public

Support:

None received

**Object:**

It is considered that it should be made clear that the housing target is set by Government. A query is raised as to whether the Council has challenged the Government on the target. It is commented that homelessness is not as big an issue as for other places, and the number of empty properties must be in the 1,000s, and that there is a need to make better use of existing houses.

**Observation:**

It is commented that the section seems generally clear and purposeful. However it is also commented that the approach to the number of dwellings proposed on rural sites seems divorced from evidenced local need and access to facilities and infrastructure. *(Comment by Councillor Christine Block)*

It is commented that there is a risk that continued housing development in the coastal and estuary valleys will undermine the appeal of these areas to visitors which will have an economic impact. The Council should resist pressure from Government.

**How these comments have been taken into account in the Final Draft Local Plan:**

In relation to the amount of income spent on housing and the mix and type of affordable housing needed over the plan period, Part 2 of the Strategic Housing Market Assessment comprised an assessment of these factors based on current information and evidence.

The housing number in the Final Draft Local Plan is based upon the standard method set out in the National Planning Policy Framework and the Planning Policy Guidance, and includes an uplift to address affordability as per the method. Revisions in Section 3 and Section 5 clarify that the housing number is based on the standard method as set out in the NPPF / PPG.

In accordance with paragraph 172 of the NPPF, the Council has considered the potential impact upon the Area of Outstanding Natural Beauty of allocating housing development within the AONB and has afforded great weight to conserving and enhancing their landscape and scenic beauty. Site allocations within the AONB will require the design and layout to reflect the location, and policy SCLP10.4 'Landscape Character' has been amended to provide greater protection to the AONB and to require proposals to be informed by Landscape and Visual Impact Assessment.

The approach to the number of dwellings on individual sites has been informed by consideration of a range of constraints and opportunities on a site by site basis, rather than applying a standard density calculation.

## Major Centres

Total comments	Support	Object	Observation
6	1	4	1

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.4 – 5.6.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Support:

Support is expressed for the approach in Felixstowe as it is considered to be better than a piecemeal approach.

Object:

Objection is raised to 2,000 dwellings at North Felixstowe Garden Neighbourhood due to loss of agricultural land, impact on use of quiet lane and impact on wildlife.

Concern is raised about the introduction of so many houses on the Felixstowe peninsula with little explanation and communication, and it seems as though it has been designed to cause confusion. It is commented that the implications are very significant and will affect everyone living in the area, and tourism. Concern is expressed that many decisions have gone against the wishes of local people. It is considered that the consultant's work (in relation to the Port) is biased towards the landowner and contains unjustified assumptions, including that the port will need more staff.

Concern is raised about impact of proposed development at Felixstowe and Brightwell Lakes on traffic in Felixstowe and the A12.

It is commented that Kesgrave and other places classed as 'East of Ipswich' should be classed as a small town with the same policies as a large village.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy SCLP3.3 provides the policy relating to development within the Settlement Boundary within Major Centres, and sets out a similar approach to that which is set out under Policy SCLP5.1 relating to Large Villages.

The policy approach towards Major centres in this section reflects the strategy of the Local Plan and considerations related to potential impacts on the environment and the local economy have been considered and assessed in identifying the strategy for the plan.

## Market Towns

Total comments	Support	Object	Observation
2	0	1	1

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.7 – 5.9.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Support

None received

Object:

Objection is raised in relation to South Saxmundham Garden Neighbourhood

Observation

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The text in this section reflects the strategy of the Local Plan and the site allocations as set out in policies in other Sections of the Plan.

## Policy SCLP5.1 Housing Development in Large Villages

Total comments	Support	Object	Observation
10	3	4	3

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council support the retention of settlement boundaries, and the identification of land outside these as countryside. (*Note: Tunstall is identified as a small village*)

Kelsale-cum-Carlton Parish Council note paragraphs 5.10 – 5.12 and Policy SCLP5.1.

Snappe Parish Council comment that a recent questionnaire showed that there is some objection and some support for further development in the village where this is linked to infrastructure, traffic management and provision of small family units. There is significant need in the village for small, social housing units. The need for housing for an aging population in the Plan is reflected in the village.

### Other organisations

Suffolk County Council AONB Team comment that In the absence of a policy on the AONB, reference should be included in Section 5 to state that proposals covered by policies SCLP5.1 – SCLP5.4 that are within or in the setting of the AONB should fully consider the impact on the AONB. The wording in SCLP5.4 'Particular care will be exercised...' , is useful and should be included in SCLP5.1-SCLP5.3.

### Developers/Landowners

M Scott Properties suggest that there should be flexibility concerning specialist accommodation that meets a demonstrated need on sites of related to the settlement boundary. The financial constraints can make such development less viable and land is likely to be released for this this use. Windfall sites outside of settlement boundaries are better suited to such development. Site 327, Land north of Heathfields, Trimley St Martin, is capable of delivering specialist housing.

### Members of the Public

Support:

None received

Object:

It is commented that doubling the size of villages like Trimley St. Martin should not be allowed.

Objection is raised to proposed housing developments in Trimley villages, Kirton and Falkenham and surrounding peninsular areas. It is considered that they are not large villages and do not have the

infrastructure to support current demands, they will become small towns and lose their village characteristics.

It is commented that the Trimleys and Walton are losing their settlement boundaries due to more and more development on the outskirts of these villages. Infill should be on small plots / garden sites, not estates.

It is commented that Kesgrave should be included here, not part of East of Ipswich

Concern is raised that the spatial distribution bears little relationship to the settlement hierarchy. The variance in planned housing growth between large villages is not explained other than that it is driven by sites with planning permission or that have been put forward. The Plan proposes that Otley is deemed capable of delivering more than Aldeburgh which is a market town. Site SCLP12.55 at Chapel Road, Otley, is close to the Baptist Chapel but not other services.

Observation:

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The need for smaller dwellings is reflected in a number of the site allocation policies in Section 12, and within Policy SCLP5.8 Housing Mix.

Policy SCLP10.4 'Landscape Character', contains a policy requirement to consider the impact on the AONB and should be informed by Landscape and Visual Impact Assessment, landscape appraisal and landscape mitigation.

The policy approach to development outside of settlement boundaries reflects the policy contained in the National Planning Policy Framework paragraphs 71, 77 and 79. A number of the site allocations contain reference to including provision for accommodation for the elderly which may include specialist accommodation as set out in paragraph 5.44.

The distribution of housing reflects the strategy of the Plan, rather than a proportional approach based on the size of a settlement or their position in the Settlement Hierarchy. The approach to site allocations has reflected the opportunities and constraints within settlements as well as the potential sites.

Infill development within Larger Villages would be considered under policy SCLP5.7 'Infill and Garden Development'.

## Policy SCLP5.2 Housing Development in Small Villages

Total comments	Support	Object	Observation
17	3	8	6

### Statutory Consultees

None received

### Parish and Town Councils

Middleton cum Fordley Parish Council welcome the generally restrictive policies proposed for small villages and that Middleton is recognised as a small village. The village has more than fulfilled its quota to 2027 and are supporting a proposed mixed social and market home development of eight units on an exception site.

Kelsale-cum-Carlton Parish Council note paragraphs 5.13 – 5.14 and policy SCLP5.2.

Benhall and Sternfield Parish Council comment that they welcome the designation of Benhall as a small village and accept provision of some new housing particularly properties suitable for first time buyers and the elderly to enable residents to stay in the community. The policy should rightly be interpreted differently to suit different villages. In Benhall any individual new development of more than 20 would be overbearing, but more than one with sufficient distance between could be absorbed.

Peasenhall Parish Council comment that it is unlikely that development will come forward in Peasenhall as the Settlement Boundary is very tight. The Parish Council would like to see a site allocation in Peasenhall and requests that sites are reconsidered.

Bawdsey Parish Council comment that a school in a small village will serve a wider area.

### Other organisations

Suffolk County Council AONB Team comment that in the absence of a policy on the AONB, reference should be included in Section 5 to state that proposals covered by policies SCLP5.1 – SCLP5.4 that are within or in the setting of the AONB should fully consider the impact on the AONB. The wording in SCLP5.4 'Particular care will be exercised...' , is useful and should be included in SCLP5.1-SCLP5.3.

Great Glemham Farms support the policy. It is stated that small villages should see growth in services such as broadband equal to urban areas. Development of employment opportunities in these villages should be encouraged.

### Developers/Landowners

Artisan PPS Ltd object on the basis that the policy is overly prescriptive and fails to recognise the functional and physical relationship such settlements have with other villages. Services, facilities and employment in one village can help to sustain the viability and vitality of others. The policy conflicts with paragraphs 78, 83 and 84 of the NPPF.

E R Winter & Son (Savills) support reference to windfall and infill sites coming forward throughout the plan period. This is in line with NPPF paragraph 78.

Woolpit Business parks Ltd comment that as the form and character of villages varies across the District the policy should enable development outside of Settlement Boundaries in some circumstances such as for sprawling villages.

Thorpeness and Aldeburgh Hotels Ltd comment that recognition should be given to more significant growth on the edge of small villages like Thorpeness to enable settlements to become more sustainable. A further criterion should be added: 'Larger residential or mixed use development will be considered favourably provided they respect the character of the village and can demonstrate significant economic and social benefits.'

### **Members of the Public**

#### Support

It is commented that this is a positive approach reflecting that most small villages have grown slowly over time.

#### Object:

Objection is raised in relation to proposed allocation SCLP12.40 Land at The Street and Mill Lane Brandeston.

It is considered that there should be no more building in Kirton so that it remains a small village.

Objection is raised to Benhall Green being a small village

#### Observation:

It is commented that clarification is needed on what constitutes a 'small group of dwellings'

It is commented that the proposal for 40 dwellings in Aldringham should be dismissed based on the policy. Aldringham should not qualify as a small village.

It is considered that there should be greater flexibility for small developments outside of settlement boundaries.

**How these comments have been taken into account in the Final Draft Local Plan:**

Paragraph 5.13 has been amended to include reference to small villages also serving the needs of surrounding communities in some instances. The strategy of the Plan supports growth in rural areas by allocating sites in small and large villages, guided by opportunities and infrastructure provision.

The policy refers to development being a small group of dwellings appropriate to the size, location and character of the village. Criterion (a) covers the considerations that would be given to the consideration around a small group of dwellings as being the size, location and character of the village. This provides flexibility in relation to size depending on the characteristics of any particular Small Village. Other policies would also be relevant in considering this such as SCLP10.4 'Landscape Character' and SCLP11.1 'Design Quality'.

Outside of Settlement Boundaries Policy SCLP5.4 would allow for housing in clusters in the countryside, further recognising the character of settlements in Suffolk Coastal and the aim to enable growth in rural areas.

The mix of housing is covered under Policy SCLP5.8.

A site allocation is included in Peasenhall in the Final Draft Local Plan, SCLP12.60.

Policy SCLP10.4 'Landscape Character', contains a policy requirement to consider the impact on the AONB and should be informed by Landscape and Visual Impact Assessment, landscape appraisal and landscape mitigation.

The Settlement Hierarchy has been revisited and Aldringham classed as countryside. The allocation has been retained as it is an existing allocation and the principle of development on the site has therefore already been established.

The provision of infrastructure in rural areas is supported under policies SCLP2.3 and SCLP3.5.

Policy SCLP4.2 supports new employment development in Settlement Boundaries, which includes Small Villages.

## Policy SCLP5.3 Housing Development in the Countryside

Total comments	Support	Object	Observation
27	4	8	15

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.15 – 5.20 and Policy SCLP5.3.

Felixstowe Town Council suggest that to ensure the policy is not seen to contradict the proposed North Felixstowe Garden Neighbourhood, the following should be added ‘Outside of the defined settlement boundaries, other than new allocations in this plan new residential development will be limited to...’.

Chillesford Parish Council comment that the village does not wish to have significant development.

Sudbourne Parish Council support policy SCLP5.3 in principle. The Council wishes to encourage developments that will meet the needs of the community. Constraints on development in the AONB should be properly applied and requirements for locally identified need and community support should be met. There should be a clear statement on local housing needs assessments, and how and when they should be carried out.

Peasenhall Parish Council state that the policy on housing in clusters in the countryside appears to be less restrictive than the policy for small villages. Surely it is better to promote development in well-established settlements than piecemeal in the countryside – the two policies should be reviewed.

Hacheston Parish Council comment that housing in the countryside must be to meet identified local needs and tied to relevant infrastructure and to infrastructure enhancements. There are no identified local needs in Hacheston beyond permitted site SSP9. The Parish Council is concerned about opportunities for development near to the A12 due to traffic and speeding issues.

Little Bealings Parish Council supports a policy of keeping the countryside around villages and maintaining their identify distinct from urban development.

### Other organisations

Suffolk County Council AONB Team comment that in the absence of a policy on the AONB, reference should be included in Section 5 to state that proposals covered by policies SCLP5.1 – SCLP5.4 that are within or in the setting of the AONB should fully consider the impact on the AONB. The wording in SCLP5.4 ‘Particular care will be exercised...’, is useful and should be included in SCLP5.1-SCLP5.3.

### Developers/Landowners

Artisan PPS object on the basis that the Policy is not compliant with paragraph 71 of the NPPF, unless covered by (g).

E R Winter and Son (Savills) comment that they support the policy, but consider the requirement to identify a local need for subdivision of a larger dwelling is not consistent with paragraph 79 (d) of the NPPF.

Woolpit Business Parks support the policy. They welcome that the Plan acknowledges the need for housing in the countryside to help sustain rural communities.

M Scott Properties are broadly supportive of criterion (g) however the policy could be further revised to include for provision of specialist accommodation on sites well related to the settlement and where there is an identified local need. Such locations do not achieve the same land values as allocated sites or those within the Settlement Boundary. Edge of settlement locations would enable residents to remain close to communities. Such schemes reduce the expense of health and social care through on site care provision or telecare. There are example of other authorities adopted such policies. Sites submitted should also be reviewed to assess their appropriateness for specialist housing. There is a track record of under delivery of such properties in Framlingham and the Felixstowe area. Whilst Policy FPP6 includes a requirement for bungalows, permission was granted with no bungalows or specialist accommodation included. Permission on site FPP8 in Trimley St Mary included just 7 bungalows.

Individual landowner comments that it is possible a higher housing target will be found unsound and therefore non strategic allocations not needed, and therefore a policy should be included which confirms the Council's support for development on unallocated windfall sites in order that Eyke can benefit even if the housing ambitions are downgraded.

### **Members of the Public**

#### **Support:**

It is stated that there should be a way of preventing excessive time and money on proposals which undermine policies.

#### **Object:**

Objection is raised on the basis that the policy should ensure that through design and/or planning conditions, annexes are not able to be separated from the main dwelling.

Concern is raised about building in the countryside through the site allocations. Proposed development at Saxmundham is in an area considered by local residents to be an area of outstanding natural beauty. Concern over loss of separation between Saxmundham and Benhall. SCLP12.26 contradicts SCLP5.3

It is considered that there should be clarification as to whether settlements with a current Physical Limits Boundary will retain that boundary if now defined as countryside. It is suggested that these should be retained to avoid confusion in relation to where policy SCLP5.3 applies.

Objection is raised to new building in Kirton, other than infill outside of the AONB and where there would not be flooding or sewerage issues.

Observation:

It is considered that the policy should allow for some small, affordable, well designed, efficient homes in the countryside for those with local connections including employment, and where there is the support of the local community.

It is commented that local builders / self build should be utilised.

It is commented that designs in the countryside should be customised.

Issues around the C309 from Debach to the junction with the A12 are raised and it is suggested that these should be addressed before any further development at Bredfield or Debach Airfield area.

It is commented that there is a need for more housing in Sudbourne, but these should be for full time residences.

It is commented that there are no 'identified local needs' in Hacheston beyond the site permitted under Policy SSP9.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Settlement Boundaries have been drawn around site allocated in this Plan, and it is therefore not necessary to refer to them as being in the Countryside.

The countryside policies will apply to any development in Chillesford, and whilst the policies support some growth in the countryside significant development is unlikely to be supported

Policies relating to different types of development in the countryside, for example SCLP5.4 Housing in Clusters in the Countryside and SCLP5.11 Affordable Housing in the Countryside include supporting text around community engagement and local housing needs surveys.

Policy SCLP5.4 'Housing in Clusters in the Countryside' supports a more limited amount of development in the countryside than would be supported within Settlement Boundaries, and therefore it is considered that the two are consistent with the Settlement Hierarchy.

It is not appropriate to limit all housing development in the countryside to that which meets identified local needs, as this would be contrary to the NPPF in relation to a number of policies such as for the re-use of rural buildings. However, Policy SCLP5.11 Affordable Housing in the Countryside does require a local need to be identified.

Policy SCLP10.4 'Landscape Character', contains a policy requirement to consider the impact on the AONB and should be informed by Landscape and Visual Impact Assessment, landscape appraisal and landscape mitigation.

Paragraph 5.19 has been expanded to include reference to development which would be supported under paragraph 71 of the NPPF.

Reference to subdivision of larger dwellings needing to meet a local need has been deleted, in order

that the policy is consistent with the NPPF.

In relation to specialist accommodation, this would be supported outside of Settlement Boundaries where it is (or is part of) a development for affordable housing under Policy SCLP5.11. Policy SCLP12.3 Felixstowe Garden Neighbourhood includes a requirement for specialist accommodation on site. The review of the Framlingham Neighbourhood Plan would provide an opportunity to consider any needs for specialist accommodation within Framlingham.

It is not appropriate to support market housing on windfall sites outside of Settlement Boundaries as this is likely to undermine the potential to deliver affordable housing on Exception Sites, would be contrary to the NPPF and would provide no locational element to the Local Plan's policies.

Policy SCLP5.4 Housing in Clusters in the Countryside provides for development of up to 3 units in clusters, and up to 5 where there is local support.

The planning system cannot insist on local builders being used, but the allocation of a range of sites and policy support for some growth in the countryside is likely to help to support the small scale building sector who would focus on development of smaller sites. Policy SCLP5.9 supports development of self-build properties. The self-build policies support delivery of customised dwellings.

Transport modelling has been undertaken through the production of the Local Plan. This does not identify any specific capacity issues on the C309, although any proposals within that area would be considered against the transport policies of the Plan.

It is noted that there are locations with a relatively high level of second homes and holiday lets. The provision of additional housing in the countryside is likely to increase availability of properties for local people, whereas without any new development in the countryside there is no opportunity to address local needs.

Policy SCLP5.13 'Residential Annexes' sets out criteria to prevent annexes from being separated from the host dwelling.

The Council would not be able to meet its housing need by only supporting development in existing Settlement Boundaries. Consideration has been given to various factors, including environmental assets and infrastructure provision, in identifying site allocations. Settlement Boundaries are drawn around site allocations. Flooding, water resources and potential impact on the AONB have been considered in allocating sites.

Settlements in the countryside that were formally Local Services Centres no longer have Settlement Boundaries. This means that countryside policies would apply across that settlement.

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

Total comments	Support	Object	Observation
15	8	3	4

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council support the inclusion of the need to protect the AONB, and that cumulative impact will be taken into account

Kelsale-cum-Carlton Parish Council – Paragraphs 5.21 – 5.28 noted. Particularly note the requirement that dwellings in clusters are well related to services and facilities, reducing reliance on the private car and avoiding isolated dwellings except in special circumstances. Also note that applicants should undertake engagement with the community and address issues raised. Policy SCLP5.4 is noted, it is important to give consideration to cumulative impacts.

Sudbourne Parish Council state that constraints on development in the AONB should be properly applied, and requirements for community support and meeting local needs should be met. Clarification is needed in relation to the terms ‘community consent’ (which should be used rather than ‘community support’) and ‘local need’, including a clear statement on how and when local housing needs assessments should be carried out. Assessments should be the basis of development proposals rather than be led by development proposals.

Bawdsey Parish Council welcome paragraph 5.26 on genuine consultation with communities.

Aldringham-cum-Thorpe Parish Council supports the policy, but consider there needs to be a more precise definition of ‘cluster’, particularly as there are villages of 100 plus dwellings in the countryside.

### Other organisations

Suffolk County Council AONB Team comment that in the absence of a policy on the AONB, reference should be included in Section 5 to state that proposals covered by policies SCLP5.1 – SCLP5.4 that are within or in the setting of the AONB should fully consider the impact on the AONB. The wording in SCLP5.4 ‘Particular care will be exercised...’, is useful and should be included in SCLP5.1-SCLP5.3.

Westover Landscape Ltd comment that it should state ‘A landscape appraisal be undertaken to inform the scale, form and design of development and to ensure that appropriate mitigation is proposed as part of any application’

### Developers/Landowners

Artisan PPS support the policy

E R Winter support the policy and state that the policy is in line with paragraph 78 of the NPPF.

Woolpit Business Parks support the policy. This approach is supported, and is of relevance to communities like Little Bealings.

### Members of the Public

#### Object:

It is commented that homes should be dispersed around villages rather than being concentrated in Felixstowe.

Concern is raised about the loss of agricultural land on the Colneis peninsula which has previously been described as the finest in the country, and that new housing will not meet local needs.

Objection is raised to the omission of a requirement for a continuous footpath where clusters are well related to a Major Centre, Town, Large Village or Small Village and requirement for the position of the end of the footpath relative to the cluster, otherwise highway safety will be compromised. The footpath should extend to at least the access of the first dwelling in the cluster, but should ideally serve all dwellings. It should apply to clusters, including those with less than 10 dwellings. Criteria (c) should be added to state 'Or c) The proposal is for up to three dwellings within a cluster of five or more dwellings which is well related to a Major Centre, Town, Large Village or Small Village;' and a new bullet to state 'Has a continuous footpath from the edge of the existing settlement to which it is well related that reaches the accesses of all dwellings within the cluster.'

#### Observation:

It is commented that exclusion of site 995 'Land to the south of Primary School, Witnesham', contradicts Policy SCLP5.4

### How these comments have been taken into account in the Final Draft Local Plan:

In relation to community support, paragraph 5.26 requires an applicant to demonstrate that meaningful and effective engagement has taken place and that scheme addresses planning issues raised. This is considered to provide a robust framework for ensuring proper engagement with the community.

Text has been added to paragraph 5.21 to clarify that clusters can in some cases be settlements which do not have the range of facilities necessary to be within the Settlement Hierarchy.

Policy SCLP10.4 Landscape contains criteria relating to the Area of Outstanding Natural Beauty and the landscape, and it is therefore not necessary to also include more detailed policy in relation landscape within Policy SCLP5.4 beyond criterion (e). This requires proposals to not cause undue harm to the character and appearance of the cluster or to result in any harmful visual intrusion into the surrounding landscape. There is also a paragraph in the Policy which makes specific reference to the AONB.

The policy provides scope for small scale development which is not allocated to come forward. The Local Plan has not sought to allocate all of those sites that have been submitted through the Local Plan process and which meet the criteria of Policy SCLP5.4 as the intention is that will enable such

developments to come forward as windfall sites throughout the Plan period.

Policy SCLP5.4 would enable development to come forward in rural communities across the District, however this alone would not provide the quantum of homes or the infrastructure that delivery of larger sites will enable.

Loss of agricultural land would be one consideration in relation to any development proposed under Policy SCLP5.4, as per Policy SCLP10.3 'Environmental Quality'.

Criterion (b) requires the development to be well related to a Major Centre, Town, Large Village or Small Village, and whilst this may include a continuous footpath it is considered that a requirement for a continuous footpath would restrict development coming forward in many parts of the District where there may be community support for some additional development.

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

Total comments	Support	Object	Observation
4	1	0	3

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.29 – 5.30 and SCLP5.5.

### Other organisations

None received

### Developers/Landowners

Artisan PPS comment that they support the policy but more guidance is needed on what is a 'significant alteration'. Every conversion requires significant alteration to comply with Building Regulations. The policy should accept that substantial alteration will always be required.

E R Winter & Son support the policy, and state that it is in line with paragraph 79 of the NPPF.

Aldeburgh Golf Club comment that the wording of the policy is inconsistent with the title and paragraphs 5.29 and 5.30, and the policy should not therefore only apply to agricultural buildings.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

It is considered that paragraph 5.30 adds additional explanation in relation to alterations, in stating that this is limited to those which are essential for the conversion to take place. The nature of such alterations is likely to vary from case to case.

The word 'agricultural' has been deleted from the opening sentence of the policy.

## Policy SCLP5.6 Rural Workers Dwellings

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.31 – 5.33 and Policy SCLP5.6. They specifically note the first part of paragraph 5.31 ‘Policy on...needs of the business’ and the first part of paragraph 5.33 ‘Where planning permission...should be provided.’

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received.

### How these comments have been taken into account in the Final Draft Local Plan:

The policy has not been amended due to the absence of any suggested amendments.

## Policy SCLP5.7 Infill and Garden Development

Total comments	Support	Object	Observation
9	2	1	6

### Statutory Consultees

None received.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.34 – 5.35 and Policy SCLP5.7. They particularly note the first two sentences of paragraph 5.34 ‘Infill development...to the rear’, and the whole of paragraph 5.35.

Wickham Market Parish Council comment that Policy SCLP5.7 conflicts with Policy SCLP11.8 and that clarity between policies is needed.

Hacheston Parish Council comment that infill and garden development is an exception to the 14 houses identified in the spatial strategy.

Felixstowe Town Council suggest amendment to read: “There would not be **significant** impact to residential amenity of occupants of either the existing or proposed dwellings;”

### Other organisations

Westover Landscape Ltd comment that there should be greater guidance on landscaping which could make infill development more appropriate, the need to protect natural features and boundaries and to accommodate new planting. There should be more clarity between this policy and SCLP11.8 which seeks to protect some garden spaces.

### Developers/Landowners

E R Winter & Son - In principle we support this policy and its wording, providing an appropriate range of criteria for the consideration of proposals for infill development in all settlements. This policy is in line with Paragraph 78 of the 2018 NPPF.

### Members of the Public

Support:

None received

Object:

Concern raised about the impact of 2,000 new dwellings at North Felixstowe and that the impact of these will far outweigh the impact of any infill development that may be permitted under this policy.

Observation:

It is commented that consideration should be given to permitting the addition of a 2<sup>nd</sup> floor flat above bungalows and excavation of garaging / storage below existing dwellings, with tax relief to encourage such properties. Stairs are beneficial to longevity and two-generational homes could help with care provision.

It is commented that a further exception to the 14 houses identified in the Spatial Strategy (for Hacheston) is with what is termed 'Infill and Garden Development' within the Settlement Boundary.

**How these comments have been taken into account in the Final Draft Local Plan:**

In response to comments from Wickham Market Parish Council wording has been added to the supporting text to clarify the inter-relationship between this policy and the Areas to be Protected from Development policy.

In response to Westover Landscape Ltd comments additional wording has been added to bullet (b) of the policy to give greater guidance on landscaping requirements.

The subdivision of existing properties would be dealt with on a case by case basis through the development management system. Tax relief is not a matter for the planning system to address.

Bullet (c) has been amended to include the word 'significant' in accordance with the comments made by Felixstowe Town Council.

## Policy SCLP5.8 Housing Mix

Total comments	Support	Object	Observation
39	3	7	29

### Statutory Consultees

Suffolk County Council comment that a range of housing options is needed for those in care which escalate as they age. There are increasing opportunities arising through new technology, housing with care and support and home adaptations. Welcome paragraph 5.45 requiring opportunities to be sought for integrating housing for older people with other community facilities, but should make reference to sustainable transport links and minimising need to drive, include sentence ‘There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car’.

### Parish and Town Councils

Middleton cum Fordley Parish Council state that the policy should encourage development of intermediate housing for elderly people. This could be on exception sites around existing care homes or in stand alone larger developments incorporating care facilities in or adjoining existing settlements.

Tunstall Parish Council support the policy and comment that too many 5+ bedroom homes have been built for some time

Kelsale-cum-Carlton Parish Council note paragraphs 5.37 – 5.48 and Policy SCLP5.8.

Kelsale-cum-Carlton Parish Council also state that in paragraph 5.39 an alternative conclusion might be that the increase in private rented accommodation reflects the affordability of housing and the lack of social housing. The Parish Council would welcome additional evidence showing how the assertion in the Plan is arrived at. The policy should set standards for wheelchair accessible dwellings. A pilot could be used to gauge demand across the District. Paragraph 5.47 is not clear.

Wickham Market Parish Council support the reference to Neighbourhood Plans including policies on housing mix. They support the policy requirement regarding accessible and adaptable dwellings.

Felixstowe Town Council state that Table 5.1 places more emphasis on 4+ bedroom homes than the Core Strategy does. There should be a policy on smaller homes for younger people and downsizing. Permitted Development Rights should be removed from smaller properties to ensure they remain as such.

Sudbourne Parish Council comment that they would be encouraged to develop a Neighbourhood Plan to identify local need to constrain future development to appropriate housing type and mix.

Bawdsey Parish Council query the thresholds of 5 and 10, and not other numbers.

Chillesford Parish Council comment that there is a need to control the growth of second homes which are increasing price and making it difficult for local people to afford homes.

Otley Parish Council refer to their questionnaire showing a desire for 2 and 3 bedroom homes that are affordable for local people. An alternative site is put forward which can meet the aims of housing being located where it will enhance or maintain the vitality of rural communities, identifying opportunities for villages to thrive and supporting local services.

Hacheston Parish Council would like the mix of housing set out in Policy SCLP5.8 to apply to permission granted on existing allocated site SSP9.

Middleton-cum-Fordley Parish Council are concerned by the number of new houses that are bought as second homes in Middleton and other similar villages. They are to investigate the production of a Neighbourhood Plan which includes a policy to preclude new homes being bought as second homes, but would welcome anything in the local plan to help. Such a policy would reduce empty properties, and would also reduce external demand and make such homes more affordable.

### **Other organisations**

Woodbridge Society support the need for 40% of new housing to be one or two bedroom, but this may not be feasible on all sites. If it is unable to be met there should be payments in lieu.

Homebuilders Federation comment that it is inappropriate to require a mix of housing on sites as small as five units. Development on these sites will be dictated by design, layout and viability. Developments of over 50 units should have regard to the mix the needed across the District to give consideration to the overall mix being delivered and to meet changing needs. Further evidence is needed in relation to the requirement for Part M4(2) as some older people will not require accessible homes. Further evidence should consider the current stock, how needs vary across tenures and viability. The Plan should outline what how accommodation needs of older people will be supported and consider in viability assessment.

### **Developers/Landowners**

Code Development Planners object on the basis that a statistical methodology for identifying mix over 20 years is unreliable. The policy should recognise the limitations and ensure that judgements on housing mix reflect the geographical and site specific circumstances.

Artisan PPS object on the basis that Paragraph 5.40 should not limit the carrying out of housing needs surveys to the public sector, who may not be willing or able to carry it out. There should be a definition of sheltered and extra care housing, and clarify whether the need is at the District or another level. Is a mix of tenures viable and does it need to include affordable housing?

Suffolk Coastal District Council (as landowner) comment that North Felixstowe will be able to accommodate a mix of housing easier than smaller developments. Development should adhere to the mix of house types identified in the SHMA. The requirement for 50% of dwellings to meet the requirements of Part M4(2) this is desirable but will affect viability.

Pigeon Capital Management comment that the mix for development of 5 or more units should be more flexible to take account of changing housing needs over the plan period.

Hopkins Homes state that there is no evidence to justify the need for 1 and 2 bedroom properties. Not all small households wish to live in small houses. The policy may discourage applications from coming forward where the mix is unviable. The policy should allow proposals to be considered on a site by site basis having regard to local need and demand at the time.

E R Winter and Son support the policy however state that it can be unviable to dictate housing mix on smaller sites. Larger developments should utilise evidence in the SHMA. Policy considered to be in general conformity with the NPPF.

Woodbridge Properties Ltd object on the basis that the mix requirements for developments of 5 or more dwellings will limit the number of small developments coming forward. The threshold should be at least 10. Many are in areas of low density housing. On sites where the prevailing character is small dwellings, the provision of 3 and 4 bedroom dwellings may not be viable. The policy is contrary to paragraph 122 of the NPPF. There is no justification for the threshold of 5. Table 5.1 should be used as a guide for overall housing provision, not a requirement for individual sites. The policy should enable Table 5.1 to be applied flexibly.

Aldeburgh Golf Club comment that the second paragraph of the policy should be removed. There should be a more flexible approach determined by local housing need, site characteristics and context and market demand at the time a planning application is made.

Gladman Developments Ltd comment that the policy approach should provide a clear requirement on how issues relating to housing mix will be considered in relation to individual planning applications, and contain flexibility to ensure that site specific circumstances can be considered, including size, location, scale and viability.

M Scott Properties consider that paragraph 5.44 is not sufficient to ensure that the type and quantum of specialist accommodation is delivered in the plan period. There are limited developers providing this form of housing. Viability will be a factor. A specific policy which supports specialist housing development adjacent to settlement boundaries should be included to provide a greater choice and mix of such accommodation.

M Scott Properties also comment that the proposed number of specialist units required over the plan period within the local plan is 1,287 (as shown at 5.42 of the LPR) which equates to 4% of those projected to be over the age of 65 by 2036. This is in direct conflict with other information available that assumes up to 25% of those in retirement would consider specialist accommodation if it was to be available. It is unclear whether the requirement has been included within the overall requirement for 10,900 dwellings over the plan period. The specialist housing market is an innovative sector that addresses a wide variety of needs, and therefore it is a subjective judgement that specialist accommodation will not meet modern requirements.

Persimmon Homes comment that the policy sets onerous requirements that may not be viable. Whilst it is acknowledged that the evidence contained within the Ipswich and Waveney Housing Market Areas SHMA, Volume 2 points towards a significant increase in the population aged 65 and over, it is necessary to bear in mind that a significant proportion of this age group will require specialist rather than main stream market housing. For these reasons, there is no justification to

require 50% of all housing on major development sites to be designed to Part M4(2) standards, especially without assessment of the financial implications of this policy requirement.

### **Members of the Public**

District Councillors:

Cllr Block outlined that there is no reference is made to opportunities that Community Land Trusts can provide in delivering housing to meet local needs. No reference is made to the need for affordable, rented accommodation in rural areas. Concern that a mix of housing may not be achieved in rural areas where sites may be for less than 10 dwellings.

Support:

None received

Object:

Disagree with the SHMA conclusion that 16% of housing need to 2036 is for rental properties as most people wish to own their home but can't afford to do so. There are elderly people in houses that are too large, and younger people in unsuitable rented accommodation.

There are too many 4 and 5 bedroom houses. There are more single person households and older people do not wish to live in an areas of solely older people. Create proper mixed developments where older person' accommodation is beside nurseries and affordable housing. This will help to address loneliness. Concern over homes becoming second homes and holiday homes which remain empty for months and create affordability issues. Jobs are also needed. New homes should include sustainable energy.

There should be a genuine mix of affordable housing.

Observation:

There is a lack of adaptable housing.

More 4 and 5 bedroom homes are built – should be a requirement for more than half to be starter homes or bungalows.

The cost of buying a house means that many can't get onto the housing ladder. Costs of renting are also too high for many. Social and affordable homes would need to make the majority of new housing to address the issue. Query over whether the Government's target of 300,000 new dwellings per year will address the issue. The number of new 3, 4 and 5 bedroom homes puts a premium on starter homes. The proposed allocation in Saxmundham will not solve the problem.

There is a need for affordable housing and housing for the elderly and disabled. There seems to be a slippage in respect of the latter.

The mix should be applied to the allocated site SSP9 which has been granted permission.

Consideration should be given to those wishing to downsize but remain in the village, such as bungalows. Bungalows in Hacheston should be retained. Development in the gardens of bungalows should be for bungalows to address amenity issues as well as provide this type of dwelling.

There is an increasing amount of holiday lets. Those which are rented out should be in business areas. The constant turnover of people is not conducive to a good sense of community.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Text has been added to paragraph 5.45 to state that there is a need for older and vulnerable people to have opportunities to access sustainable transport and modes of transport other than the car. Text has also been added to specifically refer to the need to tackle social isolation.

The policy requires proposals of ten or more units to demonstrate how the development would meet the needs of older people, and also supports development of sheltered and extra care housing where this incorporates a mix of tenures and sizes to meet an identified need. Exception sites incorporating affordable elderly accommodation could come forward under Policy SCLP5.10 provided this is meeting an identified local need.

In relation to paragraph 5.39, the need for rental properties is as evidenced by the Strategic Housing Market Assessment, which shows that the income required to access rental properties is greater than that required to access affordable rental properties, however the income required to access owner occupied accommodation is significantly greater.

In relation to wheelchair accessible standards, the Planning Practice Guidance states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, and therefore Policy SCLP5.8 does not include a requirement for these.

Paragraph 5.47 has been reworded in order to make it clearer.

Policy SCLP5.8 requires at least 40% of homes on proposals of 5 or more dwellings to be one or two bedroom homes. In addition, a number of the site allocations require a focus on smaller properties. Such dwellings may assist in meeting the needs of younger people or for downsizing.

The threshold of 10 is used for the requirement related to Part M4(2) to reflect the threshold for other housing related policy requirements such as the provision of affordable housing. This reflects that there is a cost associated with delivering this requirement. The threshold for the number of one and two bedroom dwellings has been set as proposals of five or more dwellings to ensure that smaller properties are provided on a range of sites.

The planning system is limited in its ability to control use of dwellings as second homes, however the provision of more housing overall will result in more affordable housing for local people.

It is not possible to retrospectively apply new policies to permissions that have already been granted. However, should a new application be submitted the new policies would apply once adopted.

Smaller affordable properties could be delivered through the provision of commuted sums under

Policy SCLP5.10, where it is not feasible to deliver affordable housing on site.

In relation to the requirement for Part M4(2) it is accepted that not all older people would require a dwelling built to these standards, however the requirement has not been based solely on the likely population of older people who make up the population growth over the Plan period but on other factors including those who may have a limiting long term illness and also recognises that accessible and adaptable homes benefit other sectors of the population too.

The need for 1 and 2 bedroom properties is justified by the SHMA, as referenced in paragraph 5.38. The mix of housing has been considered through the whole plan viability assessment. The first paragraph of Policy SCLP5.8 states that other mixes may be appropriate where this is based on other evidence of local needs, which provides flexibility around the policy requirements. Paragraph 5.38 states that the character of the surrounding area would also be a consideration. Paragraph 5.38 has been amended to clarify that Table 5.1 relates to District wide need.

A number of the site allocations include a requirement for bungalows on the site. Starter Homes now fall within the definition of affordable housing and would be delivered through policies on affordable housing (SCLP5.10 and SCLP5.11).

In relation to housing needs surveys, paragraph 5.40 has been amended to state that other organisations could also carry out a housing needs survey.

In relation to specialist accommodation, this would be supported outside of Settlement Boundaries where it is (or is part of) a development for affordable housing under Policy SCLP5.11. Policy SCLP12.3 Felixstowe Garden Neighbourhood includes a requirement for specialist accommodation on site. The requirement for specialist accommodation forms part of the overall housing need, as set out in the SHMA Part 2. The SHMA also comments that the needs for this type of accommodation may not be met by traditional forms of provision.

Reference to Community Land Trusts has been included in paragraph 5.48.

The amount of second homes and holiday homes is recognised, and the Local Plan policies seek to increase the mix of housing available including smaller homes and increasing the amount of affordable housing.

The site allocations in the Plan have looked to take opportunities whereby dwellings can be located close to other uses to reduce social isolation.

Policy SCLP9.2 includes a requirement for new homes to make more efficient use of energy.

The provision of jobs is also a key part of the Local Plan strategy.

Mix of affordable housing is included in Policy SCLP5.10 and SCLP5.11.

## Policy SCLP5.9 Self Build and Custom Build Housing

Total comments	Support	Object	Observation
13	3	2	8

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.49 – 5.54 and Policy SCLP5.9.

Felixstowe Town Council comment that a variety of options need to be considered such as innovative projects and good quality factory-built housing.

### Other organisations

None received

### Developers/Landowners

L Kemp and Son comment that there should be greater emphasis on developing small sites in a linear pattern so each one can be accessed independently to avoid the need to fund full access and infrastructure upfront which could be a barrier. Linear sites identified in Appendix I should be considered.

Suffolk Coastal District Council (as landowner) comment that encouragement for self-build is supported. It is supported in national policy. It is unnecessary at allocation stage to define areas for self build. As uptake of plots is uncertain flexibility will be allowed in masterplanning.

Landform Estates support the policy, and have a track record of delivering self-build plots as part of wider housing proposals

Pigeon Capital Management state that the preferred locality for the provision of self-build plots is unclear. The policy should be more flexible to reflect local demand for self build dwellings.

Hopkins Homes Ltd object on the basis that some proposed allocations have a greater requirement for self build than policy SCLP5.9. Paragraph 61 of the NPPF states that the needs should be 'assessed'. It is unlikely that those wishing to build would require a plot on a large scale housing development. The evidence obtained through a freedom of information request does not support the assertion that there is a large proportion of demand around the east of Ipswich and Woodbridge. The need is diminutive compared to the demand / need for market and affordable housing. The provision to allow serviced plots which remain unsold after 12 months to be built by the developer is not a practical solution as the build programme would be disrupted. The Home Builders Federation is of the view that requirements on sites over a certain size should not be set for self build. The approach does not help with housing supply. Inspectors have judged other Local Plans as being too prescriptive in this regard. The policy is not justified or positively prepared. The policy

should instead refer to self build plots being encouraged based on the Council's self build and custom build register at the time of a planning application. The Council should create a positive environment for self builders to locate away from large scale development.

E R Winter & Son support the policy, stating it is in line with the Self Build and Custom Housebuilding Act 2015.

Gladman Developments Ltd comment that the requirement must be based on firm evidence of need and demand. The policy requirement should include the need to have regard to the Council's Self Build Register. Other alternatives should be explored, such as use of exception sites to meet the need identified. The impact of the policy must be reflected in the Council's housing trajectory and whole plan viability. The policy is not sufficiently responsive to site specific circumstances.

### **Members of the Public**

Support:

Would like to see provision for self-build specifically included in the local plan especially where large numbers of new houses are proposed. It provides a more affordable way to house local people whilst generating high quality housing which could be affordable to run. It would create a more attractive and interesting built environment. Holland has been innovative. Demand could be high.

Object:

Land at Trimley and Kirton is already being advertised without provision for single plots. Houses should be eco-buildings that are self-sustainable, and encourage local skilled craft workers.

Observation:

Self build schemes could take a variety of forms and could be eco friendly with infrastructure provided on site.

### **How these comments have been taken into account in the Final Draft Local Plan:**

Paragraph 5.4 refers to the self build register as being the source of information for identifying the demand for self build.

The policy has been considered through the whole plan viability assessment.

The threshold of 100 dwellings seeks to ensure that it relates to sites which are phased, which would enable the take up of self build plots to be considered during the build out of the site.

Requirements for self build have been removed from site allocations of less than 100 dwellings in order that these are consistent with policy SCLP5.9.

## Policy SCLP5.10 Affordable Housing on Residential Developments

Total comments	Support	Object	Observation
26	6	5	15

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council are concerned that the policy will encourage development of 9 dwellings, where affordable housing is not a requirement.

Kelsale-cum-Carlton Parish Council note paragraphs 5.55 – 5.62 and Policy SCLP5.10.

Kelsale-cum-Carlton Parish Council also state that quantitative evidence should be added to support the sentence in paragraph 5.55 ‘...within Suffolk Coastal median property prices are higher than in the other parts of the Ipswich Housing Market Area.’ Clarification should be provided in relation to ‘designated rural areas’ under paragraph 5.58. Under paragraph 5.61, will the SHMA be amended to include more detailed modelling of the need for Starter Homes and discount home ownership? Under paragraph 5.62, is there a prescribed level of developer profit used in agreeing that the affordability content should be relaxed / how is an objective assessment of viability made?

Wickham Market Parish Council state that the requirement for developments of over 10 units to be 50% affordable/social rent, 25% shared ownership and 25% discounted home ownership is encouraging. Clarification needed on how discounted home ownership housing is funded and who is eligible.

Felixstowe Town Council agrees with the aims but state that viability is often cited as a reason to not meet the requirement. Affordable housing provision should be agreed at the earliest opportunity in the planning application process and their delivery should be ensured. Funds should be reinvested in the community from which they originate.

Eyke Parish Council comment that there is no definition of affordable housing.

Aldeburgh Town Council comment that far more generous shared ownership or affordable rent policies are needed to stem the flow of young people leaving the town and ensure a diverse age demographic.

Chillesford Parish Council support the policy. New housing needs to be affordable. It was suggested that new development sites should have mixed tenure.

Leiston Town Council comment that support for affordable homes needs to be more detailed and proactive.

### Other organisations

Woodbridge Society support the policy. When commuted sums are negotiated the amount and when and where it is spent should be made public.

Homes Builders' Federation comment that the viability assessment will need to take on board the NPPF and PPG in terms of the weight placed on plan making in relation to viability. Policies need to be thoroughly tested and realistic. The Plan will need to set out all of the infrastructure costs. The worst case scenario will need to be considered in relation to costs. Additional costs should not be brought forward after adoption. The CIL review should take place as part of the production of the Local Plan. The Council will need to consider where flexibility can be provided to maximise viability, including housing type and tenure.

Rentplus UK comment that reference to the definition of affordable housing should be replaced with reference to the 2018 NPPF. Rent to buy is now incorporated in that definition. This allows individuals to save for a mortgage deposit using a secure affordable rented period. The model is included in the category 'other affordable routes to home ownership'. The policy should reflect the new NPPF which recognises that social and affordable rented housing needs to be delivered alongside other forms of housing. Rentplus works with housing associations to encourage allocations from the housing register. Existing schemes prove popular, and also free up other forms of affordable housing. A new assessment of need for affordable housing should be undertaken to reflect the NPPF. Policy should seek the most ambitious levels of affordable housing.

#### **Developers/Landowners**

Suffolk Constabulary state that Policy SCLP5.10 should refer to vacant building credit as per paragraph 63 of the NPPF.

Quod agree with the flexibility provided on percentage split of tenures. The precise split is likely to be dependent on local markets and therefore expect the Council will apply the policy flexibly to enable development to come forward.

Artisan PPS Ltd object on the basis that there needs to be clarity about how it would be determined whether a site has capacity for more than 10 dwellings and whether a density figure would be applied. The policy needs to state whether the requirement would be rounded up or rounded down. There needs to be clarity on what 'identified local need' means. Affordable rent and social rent should be defined and clarity is needed on whether they are interchangeable and whether specified by the applicant.

Pigeon Capital Management Ltd support inclusion of discounted market homes in the policy, recognising the change to the definition of affordable housing in the NPPF. There should be more flexibility rather than a fixed percentage to provide flexibility to meet local needs.

Hopkins Homes object on the basis that the requirement for proposals for residential development with capacity for more than ten units and which have a combined gross floorspace of 1,000sqm or more does not fully accord with paragraph 63 of the NPPF, and should be amended to remove the 1,000sqm threshold.

E R Winter and Son welcome the inclusion of reference to viability, as this can be marginal.

Persimmon Homes comment that the SHMA supports an overall requirement for 25.5% affordable housing. There is therefore no justification for the target of 1 in 3 dwellings. The tenure mix is inconsistent with the SHMA. The viability of the policy should be scrutinised. Reference to schemes of more than 1,000sqm gross internal area is inconsistent with the 2018 NPPF. The definition of 'major developments' at Annex 2 of the NPPF is now clear that for housing this means where 10 or more homes will be provided.

### **Members of the Public**

District Councillors:

Cllr Block outlines that the threshold of 10 units penalises small rural communities where larger developments are not needed.

Support:

None received

Object:

Concern is raised about re-negotiation of affordable housing requirements after permission is granted. There are fewer than 150 affordable homes in the District, and these are 80% market value. In Aldeburgh 70% of homes are second homes.

Observation:

It must be a legal requirement that the stated number of affordable homes are built.

There needs to be better understanding of the definition of affordable housing and measures to ensure that developers do not avoid their obligation.

The definition of affordable housing should include affordable to run. The Council should consider building council housing to provide affordable social housing.

Where there is a need we strongly support it, and once built it must be protected as such. Brandeston has been over provided, with poor take up. Affordable housing can only be truly affordable if land value is reduced.

### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy refers to sites with capacity for ten units or more, in order to avoid situations where proposals are designed for 9 dwellings.

An update to the SHMA has been carried out in respect of the needs for affordable housing based upon the housing figure calculated under the standard method. The SHMA had already identified potential needs for Starter Homes and discounted home ownership, although recognised that these are more difficult to model than other types as they are relatively new products. Policy SCLP5.10 has been amended to more closely reflect the NPPF definition.

The whole plan viability study has assessed the costs associated with this policy alongside the other policies in the Plan and considers the policy to be viable.

Where viability assessments are required, these would be expected to be carried out in terms of the guidance provided in Appendix G of the Plan.

In respect of commuted sums, the Council operates an approach whereby these are spent within the relevant 'housing market area', of which there are five in the District.

Paragraph 5.57 refers to the NPPF in terms of the definition of affordable housing.

In addition to the requirement for affordable housing, the policies of the Plan encourage smaller dwellings which will also help to provide housing for young people to remain in the area.

It is considered that the Policy should not be too detailed in order to provide an element of flexibility around the affordable units that are delivered, however is specific on the level of affordable rent / social rent that is required.

Reference to the vacant building credit has been included in paragraph 5.62.

Text has been added to paragraph 5.62 to provide guidance on how it will be determined whether a site has capacity for ten dwellings.

Text has been added to explain how local need should be identified.

The policy has been amended to reflect the 2018 NPPF.

Whilst the overall need for affordable housing is 20.9% of housing need (as per the SHMA Part 2 update), over the past 5 years the policy requirement for 1 in 3 homes on sites of 10 or more dwellings to be affordable has delivered 18.7% affordable housing (21.1% over the past two years). It is therefore considered that continuing with this policy requirement will provide confidence that the affordable needs can be met, when compared with setting a lower requirement.

Other policies in the Plan are likely to help to reduce the running costs of a home, such as SCLP9.2 which requires greater energy and water efficiency.

## Policy SCLP5.11 Affordable Housing on Exception Sites

Total comments	Support	Object	Observation
12	1	1	10

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.63 – 5.65 and Policy SCLP5.11. Kelsale-cum-Carlton Parish Council also query whether under paragraph 5.63, is there evidence to support the assertion that limiting development beyond settlement boundaries lowers land values? Evidence in relation to homes being relocated through this provision should be included. Under paragraph 5.64 and 5.65 and SCLP5.11, Starter Homes should not be supported as part of exception sites in the countryside, as this would flaw the premise of exception sites being for affordable homes.

Sudbourne Parish Council comment that the policy will be used to bring forward proposals where market housing is necessary to ensure the scheme is viable. There should be a robust definition of 'identified local need'. It is not clear how it will be demonstrated that the location, scale and design will retain or enhance the character of a settlement or cluster and not lead to coalescence – concerned that the Council do not have the resources to back up this commitment.

Friston Parish Council comment that they generally believe that affordable housing and social housing is key to maintaining rural family life and to keep local people in the area and would welcome anything to encourage this.

### Other organisations

Suffolk County Council AONB Team comment that there should be a sentence to state that 'particular care will be exercised in sensitive locations, such as within or in the setting of Conservation Areas, the AONB and the natural beauty and special qualities and features of the LCAs in accordance with Policy SCLP10.5'.

Suffolk Preservation Society comment that it should be made clear that the policy is to meet local need and not District wide need.

### Developers/Landowners

Artisan PPS support the policy however state it needs to be compliant with paragraph 71 of the NPPF and as drafted goes way beyond what is required.

IQ Partnership Homes comment that Policy SCLP5.11 is not consistent with the NPPF paragraphs 77 – 79 and is too prescriptive. The NPPF does not require schemes to be adjacent to the Settlement Boundary or a cluster of houses or a need to demonstrate that need cannot be met through existing housing allocations or development in the settlement boundary, or that the amount of market

housing should be no more than one third of the dwellings. There may be opportunities for infilling between two existing dwellings outside of the settlement boundary where the community is accepting of the principle. There is a conflict with SCLP5.3 which states that sites can be ‘well related to’ settlement boundaries or clusters. Need may develop over time whereas allocations can only respond at a point in time, therefore there should not be a requirement to consider whether the need can be met on an allocation. Paragraph 71 of the NPPF is deliberately different to paragraph 77 in terms of wording ‘unless the need for such homes is already being met within the authority’s area’. The requirement for no more than a third of dwellings to be market housing is unjustified, an appropriate amount may depend on the type of market homes. The statement in paragraph 5.65 that Starter Homes are not considered to be appropriate on their own conflicts with the NPPF, but should instead refer to the legislative controls on occupancy. Revised policy wording is suggested.

Gladman Developments Ltd comment that paragraph 71 of the NPPF states that local planning authorities should support development of entry level exception sites suitable for first time buyers or those looking to rent their first home. It is likely that further analysis will be needed as part of a local housing need assessment to determine the need for such a policy.

M Scott Properties consider that the policy presents an opportunity to deliver specialist accommodation and care which would otherwise be unviable if competing for land with market housing. Paragraph 77 of the NPPF states that ‘in rural areas, planning policies and decisions should be responsive to local circumstances and support housing development that reflect local needs’. The policy should therefore be widened to include specialist accommodation.

### **Members of the Public**

Support:

None received

Object:

It is commented that the cost of buying a house means that many can’t get onto the housing ladder. Costs of renting are also too high for many. Social and affordable homes would need to make up the majority of new housing to address the issue. Query over whether the Government’s target of 300,000 new dwellings per year will address the issue. The number of new 3, 4 and 5 bedroom homes puts a premium on starter homes. The proposed allocation in Saxmundham will not solve the problem.

Observation:

Where there is a proven need it is strongly supported, and once built it must be protected as such. Brandeston has been over provided, with poor take up. Affordable housing can only be truly affordable if the land value is reduced.

**How these comments have been taken into account in the Final Draft Local Plan:**

The sentence in paragraph 5.64 regarding hope values reflects the situation whereby land within a Settlement Boundary will attract values related to the development of market housing.

Policy SCLP9.4 provides further detail on the needs for relocation of homes away from areas of coastal change.

Starter Homes are included within the definition of Affordable Housing in the NPPF and it would therefore be contrary to the NPPF to specify that they could not be delivered on exception sites.

Paragraph 5.65 refers to the ways in which local need may be identified, through for example a community planning exercise or local housing needs assessment.

The policy will act alongside other policies in the Plan relating to design and coalescence, and it is not considered appropriate to therefore include further detail within this policy.

Policy in relation to development in the AONB is set out under SCLP10.4 Landscape, and it is therefore not considered necessary to include further policy specifically around the AONB within this policy.

Criterion (a) of the policy states that the development is to meet local needs.

Reference to paragraph 71 of the NPPF has been included in paragraph 5.68. The policy would enable schemes providing entry level affordable housing for first time buyers or those looking to rent their own homes to be provided. Reference to need being identified through a local housing needs assessment has been included.

The policy requirement for sites to be adjacent or well related to a Settlement Boundary or a cluster in the countryside, reflects paragraph 78 of the NPPF which states that exception sites should be in locations which will enhance or maintain the vitality of rural communities.

It is considered appropriate to retain reference to the need not being able to be met on an allocation, as this would be preferable to the delivery of an Exception Site if this can meet the need. Consideration would need to be given to the timeframe within which the allocation is likely to come forward in terms of addressing the identified need.

Reference to 'well related' has been included in criterion (b), for consistency with SCLP5.3.

The requirement for a market element to be no more than one third is to ensure that the primary purpose of the development of the site is for affordable housing.

It is considered that the wording around Starter Homes only being provided as part of a mix of dwellings reflects the principle behind Exceptions Sites policy around providing affordable housing. Whilst Starter Homes fall within the definition of affordable housing in the NPPF, as the legislation defining them does not require them to be Starter Homes in perpetuity, such an Exception Site could ultimately become solely market housing. Reference to the Housing and Planning Act 2016 containing the definition of a Starter Home has been included in paragraph 5.67.

The policy could enable the delivery of affordable specialist accommodation, however enabling

open market specialist accommodation to come forward on Exception Sites may hinder the delivery of affordable housing.

Affordable housing provided on Exception Sites would be protected as such through Section 106 agreements.

The housing policies in the Local Plan seek to deliver more smaller homes, as well as affordable housing.

## Policy SCLP5.12 Houses in Multiple Occupation

Total comments	Support	Object	Observation
4	1	0	3

### Statutory Consultees

None received.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Policies 5.66 and 5.67 and SCLP5.12 are noted.

Felixstowe Town Council - There needs to be a strong mechanism to ensure that privately owned HMOs are of a good standard both in terms of the built provision, communal/amenity space for occupants and its subsequent management.

### Other organisations

None received.

### Developers/Landowners

None received.

### Members of the Public

Support:

None received

Object:

Concern that the needs of those living in sheltered or care homes are being ignored.

Observation:

These must be built and kept to a high standard. This is in all HMOs -existing and new builds.

### How these comments have been taken into account in the Final Draft Local Plan:

From 1 October 2018 Houses in Multiple Occupation that house five or more people and not a single household need to have an HMO licence. As part of this requirement the Council has set amenity and space standards that licenced HMOs must adhere to.

Wider design standards are covered by policies within the Built Environment chapter of the Local Plan.

Sheltered and extra-care housing is dealt with under Policy SCLP5.8 'Housing Mix'.

## Policy SCLP5.13 Residential Annexes

Total comments	Support	Object	Observation
6	1	2	3

### Statutory Consultees

None received.

### Parish and Town Councils

Tunstall Parish Council – criteria (a) should include a percentage increase, rather than the word ‘small’ which is subjective

Kelsale-cum-Carlton Parish Council – Paragraphs 5.68 & 5.70 and SCLP5.13 are noted.

Sudbourne Parish Council- welcomes this policy. Monitoring of such developments is a complex issue, however, and we would also welcome further definitional clarity over the actual use of annexes, perhaps by way of adding examples to the phrase ‘...sold, let or used...’ in paragraph 5.70.

Aldringham Cum Thorpe Parish Council- request additional bullet added to Policy SCLP5.13 Residential Annexes that requires additional off-road parking space to be provided.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Object:

The wording from adopted policy DM3 ‘Particular care will be taken in respect of residential annexes to ensure that, through design and/or planning conditions, annexes are not able to be separated from the main building in order to create a separate dwelling.’ should be retained.

Retain wording from DM6 within the policy "conditions will be applied to limit occupation to prevent future use as a separate dwelling."

Observation:

Support this approach as long as it is for ‘true’ annexes.

**How these comments have been taken into account in the Final Draft Local Plan:**

The inclusion of a specific percentage requirement in the policy is not considered appropriate as it would result in an overly prescriptive policy.

Additional wording has been added to the policy and the supporting text to ensure to limit the occupation of annexes to prevent future use as a separate dwelling, this includes the use of conditions.

In response to comments for Aldringham Cum Thorpe Parish Council an additional bullet (f) has been added to the policy to cover off-road parking requirements.

## Policy SCLP5.14 Extensions to Residential Curtilages

Total comments	Support	Object	Observation
3	0	1	2

### Statutory Consultees

Suffolk County Council comment that bullet point c) should be amended to read '[...] a harmful impact on the historic environment, landscape or character [...]'

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 5.71-5.72 and SCLP5.14 are noted.

### Other organisations

Westover Landscape Ltd comment that in bullet b) delete 'unless replaced'; bullet d) add in the wording at the end as per the Core Strategy: 'usually a native species hedgerow will be the most visually sympathetic boundary.' The LPA should ensure that any extensions to curtilage should respect natural features as well as satisfy the other criteria in the policy.

### Developers/Landowners

None received.

### Members of the Public

None received.

### How these comments have been taken into account in the Final Draft Local Plan:

In response to Suffolk County Council comments, bullet c) of the policy has been changed to read:

c) They do not have a harmful impact on the historic environment, landscape or character of the area, including as a result of developments ancillary to the residential use; and

Additional wording has been added to the final paragraph of the supporting text to reflect the comments made by Westover Landscape Ltd to read 'Retention of boundary features or the use of appropriate landscaping and native species can help to address any potential visual impacts'.

The policy wording 'unless replaced' has been retained in the policy to allow a degree of flexibility and avoid an overly restrictive policy.

## Policy SCLP5.15 Residential Moorings, Jetties and Slipways

Total comments	Support	Object	Observation
10	5	0	5

### Statutory Consultees

The Environment Agency stated that they have received regular reports of sewage disposal from houseboats and the lack of regulation. Therefore, sewage disposal should be properly considered by SCDC before permission is granted for any new houseboat. They would like to see included in the supporting text and the policy a requirement that any new planning consent must fully address the matter of sewage disposal, and will only be supported if there is an adequate means for sewage disposal. They also suggested an addition to paragraph 5.78 relating to flood risk activity permits. Finally, they suggested that the policy consider the overall effects on protected species and priority habitats.

Natural England have developed guidance on the nature conservation impacts of moorings, jetties and slipways which they are willing to share with the Council. This may be helpful to planners when considering proposals, and could potentially avoid the need to consult Natural England in some cases.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 5.73 & 5.80 and SCLP5.15 are noted.

Felixstowe Town Council supports Policy SCLP5.15 as it supports the replacement of existing houseboats rather than further expansion.

### Other organisations

Suffolk County Council AONB Team – Criterion (b) should state ‘they will not cause harm to the integrity of European sites and Ramsar sites, either on their own or in combination with other uses’, to reflect that Special Areas of Conservation and Ramsar sites may also be affected.

The Woodbridge Society supports Policy SCLP5.15.

The River Deben Association suggested the undertaking of an on-the-ground assessment of boat dwellers’ accommodation needs given that it is recognised that the current assessment represents a significant underestimation. They have stated their support for the definition of houseboats detailed in paragraph 5.73 and for paragraph 5.77. They have suggested the inclusion of a note relating to the discharging of untreated sewage by houseboats.

### Developers/Landowners

None received

## Members of the Public

District Councillors:

Cllr Christine Block suggests the inclusion of figures from the Boat Dwellers Accommodation Needs Assessment is misleading as it is an underestimation. Added to this, she argues that it will not be possible to introduce an additional 17 moorings along the Deben Estuary by restricting houseboats to given areas where many other boats are moored. She also states that the use of the term 'on land' in the first bullet point of paragraph 5.76 is misleading as many new houseboats can be moored to jetties and therefore assume planning consent is not required.

Support:

Support for Policy SCLP5.15.

Residential moorings, jetties and slipways should not inconvenience use of public rights way.

Objection:

None received

Observation:

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Wording in the supporting text and the policy amended to give greater consideration to flood risk, European sites, Ramsar sites and sewage disposal.

Supporting text amended to provide greater clarity as to what planning consent must be obtained for.

It is noted that the Boat Dwellers Accommodation Needs Assessment underestimated the number of permanent houseboats located in Suffolk Coastal. The Council is not legally bound to the outcomes of this assessment. This policy is based on a combination of factors including best practice examples, responses to the Local Plan and further localised evidence relating to houseboats, along with the Boat Dwellers Accommodation Needs Assessment.

## Policy SCLP5.16 Residential Caravans and Mobile Homes

Total comments	Support	Object	Observation
3	0	0	3

### Statutory Consultees

Environment Agency state that caravans and mobile homes are considered to be inappropriate in flood zones 3a and 3b. Consider whether they should be permitted in flood zone 2.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council are concerned that there is no policy on mobile homes, static caravans and holiday parks.

### Other organisations

Westover Landscape Ltd comment that proposals should be accompanied by landscape appraisals and landscape schemes to ensure landscape impact can be mitigated.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Reference to the need for caravans to be located outside of Flood Zones 2 and 3 has been included in criterion (c).

This policy covers caravans used for permanent residential use. Policies in Chapter 6 relate to tourism accommodation.

Proposals would be considered against Policy SCLP10.4 Landscape and therefore it is not necessary to include further policy on landscape under this policy.

## Policy SCLP5.17 Gypsies, Travellers and Travelling Showpeople

Total comments	Support	Object	Observation
3	1	0	2

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note paragraphs 5.84 and 5.88 and Policy SCLP5.17

### Other organisations

Suffolk County Council AONB Team comment that where proposals fall within the AONB or its setting these will have to consider impacts on the AONB. Size, scale, design, lighting and boundary treatments will be key considerations. A criterion should be added to SCLP5.17 to reflect this.

### Developers/Landowners

None received

### Members of the Public

Support:

Travellers could use the existing camping and caravan sites.

Object:

None received.

Observation:

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Reference to landscape character has been added into criterion (e).

Applications to use existing camping and caravan sites for Gypsy and Traveller use would be considered against the criteria contained within this policy.

## 6 Tourism

### Policy SCLP6.1 Tourism

Total comments	Support	Object	Observation
18	9	5	4

#### Statutory consultees

Suffolk County Council - Paragraph 6.3 should include reference to public rights of way as a strength in the District, not least given the role they play in enabling the public to enjoy the tourism experiences listed.

Suffolk Coastal - Suffolk Coastal comprises a number of destinations which rely on the tourist activity and footfall it attracts and generates. Policy SCLP6.1 recognises the key locations for tourism throughout the district, identifying Felixstowe as a main coastal resort targeted for further tourist related development. As a coastal resort, it is important that tourism activity is maintained and developed, promoting key sea front assets. The sea front is an important aspect for Felixstowe which will require investment over the plan period to help meet the needs of current and future tourist activity and to regenerate areas such as the south sea front. Draft policy SCLP6.1 will help ensure that the longevity of tourism across the district. Support the plan in promoting the quality of tourism throughout the district, with an approach consistent with the aims and objectives of the East Suffolk Business Plan, the East Suffolk Tourism Strategy and the East Suffolk Economic Growth, with the approach to tourism reflecting themes set out in the Suffolk Coast Tourism Strategy 2013 – 2023.

In respect of the natural environment the DLP states that it has been informed by the Suffolk Coasts and Heaths Management Plan 2018 to 2023 which is an important evidence-based approach, yet this document has not yet been published for consultation. It is problematic to see how the DLP can have been informed by evidence from a non-existent plan.

#### Parish and Town Councils

Bawdsey Parish Council - Paragraph 6.4 is helpful with reference to increasing tourism outside the main tourist season Policy SCLP6.1 Paragraph 3 references 'area's capacity for growth' but does not say how this would be measured/agreed. Last paragraph- should replace 'does not conflict' with 'clearly recognises'.

Kelsale Parish Council - seeks clarification from SCDC as to why the Local Plan remains silent on the issue of mobile homes, static caravans, Holiday Parks and the lack of treatment comparable with virtually every other category of dwelling contained in the 1st Draft Local Plan.

Peasenhall PC - Tourism is a vital part of the economy of the region. Visitors appreciate the nature of the village and its facilities and these must be protected. Growth is part of this protection to support its existing facilities so important for tourism and of course its residents.

Levington & Stratton Hall PC - As the Parish Council represents two parishes within the AONB it will be of no surprise that we are strongly protective of retaining its natural beauty as, if it was in peril of being damaged, then it would be lost forever. As there will be massive residential development nearby [Felixstowe/Trimleys] then there must be clear mitigation to protect these areas for the

defence of the protected sites, wildlife, the natural environment and the resident communities. The PC is not convinced the DLP is clear on this.

### **Other organisations**

Westover Landscape - The policy is too weak, it needs to refer to the need for high quality landscape appraisal and design to be undertaken to ensure that developments do not conflict with the character of the landscape.

Aldeburgh Society - The immense amount of work and expertise put into this document is recognised. The general, District-wide policies are supported with especial mention of Digital Infrastructure, Employment Protection, Coastal Management and Flood Protection, Landscape Quality Protection and Enhancement, Climate Change and related developments, Tourism, encouragement but control, Sustainability, no new allocations for Market Towns, 3.4, and Protection of the Countryside.

FCC Environment - supports the statement in Policy SCLP6.1 Tourism that "Proposals for tourist related development will be determined by the area's capacity for further growth in the following locations ... e) rural areas across the rest of the District...". This is in line with the NPPF which states that "planning policies and decisions should enable: ... c) sustainable rural tourism and leisure developments which respect the character of the countryside..." (paragraph 83).

### **Developers / landowners**

Camilla Cooper Webster - Support particularly part b which identifies Framlingham as a suitable location for tourism development. Recognise the important role tourism plays in the local economy, particularly in Framlingham. Also support Policy SCLP6.2: Existing and New Tourism Attractions and the Council support for proposals for tourist attractions across the district for recreational, cultural and leisure uses, particularly those that attract visitors throughout.

### **Councillors**

Councillor Christine Block - Survey results for the Deben Estuary show that a large majority of tourists chose to come to the Suffolk coast, estuaries and heathland because of the 'peace and tranquillity' they find there. The long list of attractions fails to recognise the AONB and Heritage Coast – the very landscape which enables Suffolk to be seen as an exceptional area.

### **Members of the public**

The local road network does not have the capacity to accommodate the traffic now so thousands more houses are not going to help tourism.

Object to the building of an industrial area near to Trimley St. Martin, an additional industrial area will drive tourists away as they will be effectively driving through an industrial area just to get to the town, increased traffic which is predominately heavy goods vehicles is highly dangerous, environmentally damaging as well as restrictive of access to the heart of the town and tourist areas.

Sense of disregard for quality of AONB and benefit in conserving this invaluable asset which draws visitors to the area Text and policy make no reference to value of seascape or importance of biodiversity.

Text and policy do not address or include the - Lack of public transport – particularly within the AONB. Opportunity to support ‘park and walk’ options Value of the Walkers are welcome scheme Value of foot ferries.

Reference is made to ‘supports local facilities where the local road network has the capacity to accommodate the traffic generated. . .’ This policy statement is weak.

Supporting text should inform to what degree the capacity of the local road network is significant – ie recognising the restrictions of single track roads / lack of parking.

Reference is made to ‘development will be determined by the area’s capacity for further growth’ – d) the AONB. The ‘capacity’ of the AONB is not clarified leaving the statement confusing and contradictory when taken against other text relating to the AONB (Pages 150)

While cyclability and walkability are already very attractive for tourists, they could and should be much more so. Suffolk Coastal’s superb network of minor rural roads (i.e. those generally under 4 m wide so having passing places and coloured yellow on OS maps) is an under-exploited asset for tourists and residents.

Tourism is key to the area. It provides the escape to tranquillity, sea and scenery and hospitality which need preserving and enhancing. It seems heavily dependent on imported labour which rather underlines the need for some thoughtful management.

Would hope to see input of Snape Maltings in the local plan as a year-round destination and a catalyst for associated activities and groups.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Rights of way are not specifically mentioned because whilst they are recognised as important elsewhere in the Plan they are not distinct to Suffolk Coastal.

The Final Draft Local Plan is a comprehensive and flexible policy framework against which business and development proposals can be positively assessed against planning consideration. It is not the role of the Council’s Local Plan to categorically determine or restrict up front the ways in which the tourism sector or businesses may evolve their year round tourism function. The Local Plan is however prepared to work in relation to other plans and programmes such as the East Suffolk Tourism Strategy and the East Suffolk Business Plan.

The Local Plan is not required to plan to meet an objective assessed requirement for visitor accommodation in the district in the way it is required to in respect of the amount of new dwellings.

Iterative preparation of the Final Draft Local Plan has involved ongoing engagement with the AONB Unit and other environmental bodies to ensure consistency between plans where they are reviewed and updated.

Development proposals for static caravans, chalets and other visitor accommodation are required to be consistent with policies throughout the Final Draft Local Plan which provide a comprehensive framework for planning decisions to reconcile economic, environmental and social planning considerations in respect of individual proposals.

Supporting evidence and engagement feedback in respect of tourism has been used to help inform and shape the Local Plan strategy and planning policies including specific policy approaches for distinct places characterised by varying tourism functions. However, it would be inconsistent with national planning policy to avoid meeting District housing growth requirements based on tourism considerations.

Wording in respect of the local road network is intended to be general and flexible to enable scrutiny that is particular to individual development proposals and their potential highways impacts.

Tourism policies work alongside the natural environment policies including those in respect of the AONB and coast. The Tourism Section reflects the distinctive nature of tourism destinations in Suffolk Coastal such as culture, festivals, music, art, films and food rather than name or single out individual destinations. The policies have been shaped to provide a comprehensive policy framework to positively support evolution and appropriate growth of tourism destinations such as Snape Maltings.

## Policy SCLP6.2 Existing and New Tourism Attractions

Total comments	Support	Object	Observation
8	2	2	4

### Statutory Consultees

Historic England advise that they have not reviewed this chapter due to limited capacity.

### Parish and Town Councils

Kelsale-cum-Carlton are disappointed that the Local Plan remain silent on the issue of mobile homes, static caravans, holiday parks and the lack of treatment comparable with virtually every other category of dwelling contained in the First Draft Local Plan. KCC feel it is necessary to have a policy to rectify this unsatisfactory and ongoing position.

Felixstowe Town Council - There needs to be a stronger and better evidence for the core importance of tourism to the economy of the district and wellbeing of communities. Given the significance of tourism to Felixstowe, the Town Council is pleased to note the aims within these policies; particularly the support for local management of the resort and the development of out of season opportunities.

Support development of out of season opportunities. It is important that consideration be given to the nature and type of attractions that would work in the different areas of Felixstowe and the policy should guide development opportunities in this way.

### Other organisations

Westover Landscape Ltd suggest that Policy SCLP6.1 is too weak and it needs to refer to the need for high quality landscape appraisal and design to be undertaken to ensure that developments do not conflict with the character of the landscape.

Aldeburgh Society - The immense amount of work and expertise put into this document is recognised. The general, District-wide policies are supported with especial mention of Digital Infrastructure, Employment Protection, Coastal Management and Flood Protection, Landscape Quality Protection and Enhancement, Climate Change and related developments, Tourism, encouragement but control, Sustainability, no new allocations for Market Towns, 3.4, and Protection of the Countryside.

### Developers/Landowners

Policy SCLP6.1 recognises the need to increase and improve the quality tourist experience and opportunities in the district. Felixstowe sea front is integral to the vitality of Felixstowe and Suffolk Coastal. Support the policy as it is consistent with the East Suffolk Business Plan, East Suffolk Tourism Strategy and the East Suffolk Economic Growth Plan.

Support for Policy SCLP6.2 as high standard of design is critical for tourist development at Felixstowe seafront. This policy will ensure high standards are enforced with proposals to achieve the best schemes for the sea front and achieve a successful mixed use visitor attraction on the existing leisure centre site.

Snape Maltings is of great importance for both its heritage and cultural activities and has its own specific allocation (Policy SSC33). Whilst the future use and development is supported by existing policy inadequate parking facilities are a major constraint that must be resolved. Parking problem is a major barrier and is restricting opportunities for regeneration of derelict buildings. Land to the south of Snape Maltings provides the most appropriate solution to the long term parking issues and can be delivered on site 727 and 728.

Andrew Martin Planning recognise the role tourism plays in the local economy and propose a high standard development which attracts visitors throughout the year. The proposed development will support the East Suffolk Business Plan, the East Suffolk Tourism Strategy and the East Suffolk Economic Growth Plan which strives to build on increasing visitor numbers outside of the main tourist season.

### **Members of the Public**

District Councillors

Cllr Christine Block outlines that the long list of attractions fails to recognise the AONB and Heritage Coast, the very landscape which enables Suffolk to be seen as an exceptional area. The supporting text to Policy SCLP6.1 should inform to what degree the capacity of the local road network is significant.

Support

Support links between Felixstowe Museums, businesses, the community and museums in Ipswich.

Support railway heritage features at Felixstowe Train Station.

Object

Rather than replacing Felixstowe Leisure Centre as proposed, a large tourist attraction (example Sealife Centre) should be introduced as a destination to attract people to the area.

Object on the basis that tourism and culture should be given more emphasis.

There should be ideas as to how the experience and expertise at Snape Maltings can be harnessed for the benefit of all.

Observation

Consider opportunities from rail freight to promote public transport and tourism to Leiston and surrounding area, including the Leiston Works and Aldeburgh Railway branch.

Promote the use of piers / jetties for tourist boat trips between coastal towns.

SCLP6.1 Tourism includes “...the Council will seek to manage tourism...in a way that protects the features ... and supports local facilities where the local road network has the capacity to accommodate the traffic generated from proposals,” which context understandably implies motorised traffic. While cycling and walkability are already very attractive for tourists, they could and should be much more so. 6.10 mentions “car parking, bus routes, cycle facilities, rail infrastructure and pedestrian links will be supported...” Good, but Suffolk Coastal’s superb network of minor rural roads (i.e. those generally under 4 m wide so having passing places and coloured yellow on OS maps) is an under-exploited asset for tourists and residents. In brief, ever-increasing motorised traffic tends to spill over from the main roads into the lanes where inconsiderate drivers seriously deter walkers, cyclists and riders of mobility scooters and horses; i.e. Non-motorised users (NMUs). As many of these NMUs are or should be residents en-route to work, school, shops, sports and recreation etc. suggestions for improving walkability and cyclability are covered below in our comments under Transport.

Tourism is an important element of the District's economy. The local road network does not have the capacity to accommodate the traffic now, it functions. Thousands more houses are not going to help tourism.

Felixstowe should create its own niche for tourism. We already have gardens, theatre, pier and swimming pool which offer a perfect mix of 'gentle' amenities on the sea front. We offer the woodlands and countryside in North Felixstowe for walking. We offer the unique Felixstowe Ferry hamlet with boat trips, cafes, pubs and of course crabbing. At Landguard we offer the fascinating fort, museum, view point café, view of the port and boat trips to Harwich and Shotley. I feel strongly we already have our niche which needs promoting. Apparently none of these pleasures were mentioned in the 'day out by train' in East Anglia booklet. There is no other coastal town in Suffolk that offers such unique facilities for a day or weekend visit. We must make sure we do not spoil what we have by trying to become something which does not suit us and our culture. Be proud of what we have, protect it, invest in it and maintain it.

This means building a super new leisure centre in North Felixstowe is so wrong. It will spoil the countryside area by making it an urbanised green space. The Leisure facilities must be on the sea front; use abandoned hotels, use the present leisure site area and its car park for a building and then put a car park on the North Sea Hotel site or an underground car park away from the front. We must be innovative to move forward but not spoil what we have and love. Again good bus connections and cycle ways will be essential to the sea front, Felixstowe Ferry, North Felixstowe woodland and Landguard Point.

Tourism and Culture - Tourism is key to the area. It provides the escape to tranquillity, sea and scenery and hospitality which need preserving and enhancing. It seems heavily dependent on imported labour which rather underlines the need for some thoughtful management. If all these projects proceed, what land is going to be left East of the A12 to attract visitors? However, I can imagine that some accommodation providers and second home owners might be attracted to renting out their properties to temporary workers during the construction periods; but what does that do for the long term? - I would think that Snape Maltings can provide considerable input. Its activities extend into education and it would doubtless like to expand its various activities. These attract visitors but many become residents and contribute locally. It is now a year-round destination

and a catalyst for associated activities and groups. One would hope to see their input into a local plan.

**How these comments have been taken into account in the Final Draft Local Plan:**

Self catering caravan and mobile accommodation is not within the scope of this policy but is addressed through other policies within the Tourism chapter of the Final Draft Local Plan.

Wording added to the opening paragraphs of the section around the importance of tourism to the economy and wellbeing.

Available evidence including the Suffolk Coastal and Ipswich Retail and Commercial Leisure Study does not identify specific tourism attraction opportunities in particular locations. Rather the evidence indicates that a broad range of types of development may reflect the nature of destinations throughout the district and help them evolve and prosper.

The Local Plan spatial strategy for the amount and spread of housing growth and site allocations are subject to cumulative highways modelling to address issues in relation to the capacity of the road network with Suffolk County Council Highways and the Highways Agency. Policy SCLP12.14 'Spa Pavilion to Martello Park' in the area specific policies section positively addresses tourism and leisure development opportunities at Felixstowe seafront. A new policy to guide the future redevelopment of the Felixstowe Leisure Centre site has been included within chapter 12 of the Final Draft Local Plan.

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

Total comments	Support	Object	Observation
9	2	1	6

### Statutory Consultees

None received

### Parish and Town Councils

Tunstall Parish Council fully support the District Councils policy on tourism within the AONB and Heritage Coast (Policy SCLP6.3). We also support the concept of greater involvement of local communities in tourism proposals.

Kelsale-cum-Carlton note the provisions of this section but defer comments to those groups within the highly prized and respected assets.

Sudbourne Parish Council – Reference the Landscape Character Assessment in relation to the character of the AONB as a patchwork of smaller landscape features that together fit into and enrich that broader countryside and a stronger emphasis on the avoidance of light pollution in sensitive areas.

### Other organisations

Suffolk Coast and Heaths AONB Unit suggest text amendments to Policy SCLP6.3 Paragraph 2 should read, “Tourism development in the AONB **or its setting**, and Heritage Coast will be supported where:” Criteria (e) of the policy should also be amended to read “Supports the conservation **and enhancement of the natural beauty and special qualities of the AONB and its setting.**”

### Developers/Landowners

Land at Snape Maltings promoted for car parking to provide additional car parking provision on a site within the AONB and well related to the Historic Assets of Snape Maltings and surrounding buildings in the Conservation Area.

### Members of the Public

District Councillors

Cllr Block outlines that the importance of the AONB should be reflected stronger in policy and wording in paragraph 6.18. Wording of Policy SCLP6.3 is too relaxed and needs strengthening with additional wording in (d) to read “Avoids **prevents** or mitigates for adverse impacts on the natural environment” and (h) “Minimises light pollution from artificial sources **and ensures the retention of dark skies**”

**How these comments have been taken into account in the Final Draft Local Plan:**

The Landscape Section approach of Landscape Character reflects that the character of the district inside and outside the Area of Outstanding Natural Beauty is very much a matter of a patchwork of smaller landscape features.

Amended supporting text and policy wording concerning the Area of Outstanding Natural Beauty and its setting as well as dark skies.

## Policy SCLP6.4 Tourism outside of the AONB

Total comments	Support	Object	Observation
4	0	0	2

### Statutory Consultees

Suffolk County Council - Specific reference to the historic environment would be welcomed, via an additional bullet point, to encourage development to specifically consider its contribution to the historic qualities of the Heritage Coast. k) Protects and enhances the historic environment, including taking up opportunities to include measures which explain how development relates to the heritage of the . This reflects what is set out in Policy 11.3 and the District Council may consider 11.3 to be sufficient in its own right, but Policy 6.3 is intended to set a specific framework for tourism in the AONB and heritage is an important contributor to the local tourism 'offer'. Paragraph 6.3 should include reference to public rights of way as a strength in the District, not least given the role they play in enabling the public to enjoy the tourism experiences listed.

### Parish and Town Councils

Levington Parish Council - The PC is not convinced the DLP is clear on this. In respect of the natural environment the DLP states that it has been informed by the Suffolk Coasts and Heaths Management Plan 2018 to 2023 which is an important evidence-based approach, yet this document has not yet been published for consultation. It is problematic to see how the DLP can have been informed by evidence from a non-existent plan. The Parish Council will make further comment once it has seen the emerging plan.

Kelsale-cum-Carlton recognise the value of tourism and suggest that the Plan has a policy on the impact of a holiday park on the community. The Local Plan needs to include detail on mobile homes, static caravans, holiday parks and the lack of treatment comparable with virtually every other category of dwelling in the First Draft Local Plan.

Sudbourne Parish Council welcomes this policy, but with some caveats, and we particularly wish that there were reference to the recently completed Landscape Character Assessment in the constraints, rather than the simple statement '..avoids locations sensitive to the exposed nature of the AONB..' - the character of the AONB is not simply its exposed areas and wider panoramas, but is very much a matter of a patchwork of smaller landscape features that together fit into and enrich that broader countryside. Similarly, in terms of the '...management of the local area...' referred to in the preamble to the policy, we would very much welcome a reference to local benefits and local community support for tourism development, to ensure that the local impact and perhaps disbenefits of such developments are not ignored in favour of the district-wide beneficial effects. Once again, the balance of growth, environmental sensitivity and local amenity needs to be explicit and openly achieved. Sudbourne Parish Council would also like a much stronger emphasis on the avoidance of light pollution in sensitive areas to be incorporated in SCLP6.3 and elsewhere.

Bawdsey Parish Council - 6.4 is helpful with reference to increasing tourism outside the main tourist season. Policy SCLP6.1 Paragraph 3 references 'area's capacity for growth' but does not say how this would be measured/agreed. Last paragraph- should replace 'does not conflict' with 'clearly recognises'. Policies SCLP6.3, 6.4 Apart from references to AONB these should be the same (thus c. in 6.4 should also say 'avoids and mitigates' as in 6.3d. Policies SCLP6.3, 6.4 Apart from references to AONB these should be the same (thus c. in 6.4 should also say 'avoids and mitigates' as in 6.3d.

### **Other organisations**

Westover Landscape Ltd are concerned that no policy seems to resist the conversion of touring sites to permanent log cabins, static caravans, cabins and chalets. Conversion of such sites often leads to significant landscape impact and creation of almost permanent residential sites. Urge SCDC to retain suitable policies to encourage touring sites to thrive and include stay restrictions on sites where cabins are permitted. Policy SCLP6.5 d) should surely reference mitigation, f) how will adverse impact of traffic be assessed?

### **Developers/Landowners**

FCC Environment supports the statement in Policy SCLP6.1 Tourism that "Proposals for tourist related development will be determined by the area's capacity for further growth in the following locations ... e) rural areas across the rest of the District...". This is in line with the NPPF which states that "planning policies and decisions should enable: ... c) sustainable rural tourism and leisure developments which respect the character of the countryside..." (paragraph 83).

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

The District's coastline north of Felixstowe is Heritage Coast and is all within the Area of Outstanding Natural Beauty so this is addressed in the previous policy.

The use of caravans as dwellings by local residents and workers is a symptom of housing need that is not met in the existing housing stock. The Final Draft Local Plan strategy is to boost the supply and choice of housing including affordable homes and homes for rent.

The Landscape Section approach of Landscape Character reflects that the character of the district inside and outside the Area of Outstanding Natural Beauty is very much a matter of a patchwork of smaller landscape features.

Tourism accommodation policies include restrictions on occupancy conditions. The supporting text of the tourism section promotes a wide range of different types of tourism accommodation.

## Policy SCLP6.5 New Self Catering Tourist Accommodation

Total comments	Support	Object	Observation
9	1	2	6

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council seek clarification of the applicability of the provision of SCLP6.5 to existing Holiday Parks in respect to the extent that this will extend the requirements beyond those currently in place and that have been proven to be completely ineffective and/or inadequate in dealing with the realities of dealing with an experienced Holiday Park operator. The existing situation has arisen due to ineffective enforcement action.

Felixstowe Town Council - The tourism offer in Felixstowe is different to that of other parts of the District and the variety across the whole of the town - not just the seafront area - should be taken in to consideration. From caravans, self-catering and 'Airbnb' style options to budget and luxury hotels, the objective should be to provide a variety of accommodations which can appeal to a range of tourists and promote longer stays in Felixstowe.

Peasenhall Parish Council - Tourism is a vital part of the economy of the region. Visitors appreciate the nature of the village and its facilities and these must be protected. Growth is part of this protection to support its existing facilities so important for tourism and of course its residents.

### Other organisations

None received

### Developers/Landowners

Heveningham Hall Estate highlights the landscape and heritage asset restoration projects that are being implemented. Reference made to the Wilderness tourism brand which promotes low density all year round tourism which through careful designs creates an element of new construction to compliment the wider landscape works of the estate. Extensive restoration of a wide range of grade I, II and II\* using traditional methods of construction and specialist local tradespeople. Heveningham Hall Estate request amendments to the penultimate paragraph of Policy SCLP6.5. "Self catering tourist accommodation comprising permanent buildings will only be permitted within the Settlement Boundaries, through the conversion of rural buildings of permanent structure, ~~or~~ on medium and large scale sites where commercial, recreational or entertainment facilities are provided on site; or where such development forms part of a comprehensive landscape creation master plan and support wider landscape and ecological gain.

Supports the statement in paragraph 6.25 that "Providing a diverse range of tourist accommodation across the District is desirable and the Council is generally supportive of opportunities that come

forward subject to compliance with other policies in the Local Plan”. Support the statement in paragraph 6.26 that “National Planning Policy supports tourism opportunities in the rural areas and as a predominately rural District these areas can provide a valuable economic and social contribution through increased spend in the local area and the provision of jobs and associated employment”.

FCC Environment supports the statement in paragraph 6.25 that “Providing a diverse range of tourist accommodation across the District is desirable and the Council is generally supportive of opportunities that come forward subject to compliance with other policies in the Local Plan”.

Heritage Developments contend that draft Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast, is overtly prescriptive and inflexible; is in direct contradiction to Heritage Developments’ position on tourism set out above; and is unsupported by National Planning Policy and guidance. Criteria b of the draft Policy implies that only where proposals for holiday accommodation comprise 10 pitches / units or less will they be supported. This quantified limit is neither justified nor positively prepared and is as such considered ‘unsound’. Further, it is considered that limiting tourism developments to such a quantum is uneconomical for operators. The policy as written envisages development, which we submit, will prove to be unviable and the policy will have the unintended consequence of restricting growth in the tourism sector (contrary to East Suffolk Business Plan objectives). As outlined in earlier sections of these representations, the proposed allocation site comprises a modified and part developed area of the AONB. The capability of the subject site to accommodate development (as with any other modified, previously developed, or less ‘pristine’ areas within the AONB), fails to be recognised within the draft policy. As such Heritage Developments continue to advocate a more flexible approach to the location of new tourism development and one that responds solely to the characteristics of the site and its surroundings and the design of the proposed tourism accommodation. In addition, the draft policy places significant emphasis on the need for tourism accommodation to be close to a particular settlement. Such a requirement is considered by Heritage Developments to be neither necessary or appropriate given that many forms of tourism accommodation benefit from and actively support rural or remote locations, particularly glamping or eco-tourism facilities. Heritage Developments suggest the following, alternative wording to draft Policy SCLP6.3. Draft Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast. Applicants are encouraged to engage with local communities and the Suffolk Coast and Heaths AONB Management Unit in evolving development proposals, with the aim of delivering development that takes an active role in the management of the local area.

Tourism development in the AONB and Heritage Coast will be supported where it:

- a. Enhances the long-term sustainability of the area;
- b. Is of an appropriate scale for its surroundings small scale (10 pitches/units or fewer in relation to proposals for holiday accommodation);
- c. Is well related to existing settlements and / or supporting facilities;
- d. Avoids or mitigates for adverse impacts on the natural environment;
- e. Supports the conservation of the AONB;

- f. Is of the highest design standards and where appropriate reuses existing buildings;
- g. Promotes innovative, contemporary design in appropriate locations;
- h. Minimises light pollution from artificial light sources;
- i. Avoids locations sensitive to the exposed nature of the AONB and Heritage Coast; and
- j. Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.

### **Members of the Public**

District Councillors

Cllr Block outlines that Policy SCLP6.5(f) is blatantly untrue when considered against traffic congestion at coastal and estuary “hot-sports” during summer months.

Support

None received

Object

None received

Observation

In the Felixstowe area could provision be made to attract people who prefer to camp especially those who do not use a car. There is already enough self catering holiday accommodation and lets, It is already killing communities and any more is going to make highway traffic untenable especially in the popular summer months.

### **How these comments have been taken into account in the Final Draft Local Plan:**

Additions to the supporting text and in the strategy for rural areas that small scale hotel and tourism development is supported in the physical limits of large and small villages in the settlement hierarchy as well as town and district centres and Felixstowe seafront.

## Policy SCLP6.6 Existing Tourist Accommodation

Total comments	Support	Object	Observation
2	0	0	2

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council recognise value of tourism but are disappointed that despite ongoing discussions regarding the impact of holiday parks on the community, the First Draft Local plan does not have a significant policy to rectify this unsatisfactory position.

Felixstowe Town Council - agree that it is preferable to protect existing tourist accommodation from conversion/redevelopment; however, we question whether this is achievable through policy alone.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Impacts of existing and established tourism accommodation are outside the scope of this policy.

The policy and supporting text of the policy relate to Marketing Guidance evidence in terms of protection of tourism accommodation use of sites and premises.

## 7 Transport

### Policy SCLP7.1 Sustainable Transport

Total comments	Support	Object	Observation
21	0	4	17

#### Statutory Consultees

Suffolk County Council suggested an amendment to Policy SCLP7.1 to ensure that it requires the protection of the public rights of way network in line with the NPPF. They also suggested the inclusion of additional supporting text to explain the functions of public rights of way. In a separate response, they questioned how the term ‘significant adverse impact’ in Policy SCLP7.1 relates to the test of ‘severe’ impacts as outlined in paragraph 109 of the NPPF. They also recommended that the thresholds for requiring a Transport Assessment and Transport Statement should be identified as being indicative because, as is set out in the NPPF, the requirement for a transport assessment should be based on the significance of the highway impact.

#### Parish and Town Councils

Kelsale-cum-Carlton Parish Council recommend analysing the applicability of Travel Plans for all multiple dwelling development proposals within KcC, looking particularly at the potential resident profile, housing mix, immediate road infrastructure and any cumulative impacts.

Kettleburgh Parish Council have expressed concerns with proposed development in Kettleburgh and surrounding areas, in that, it will contravene Policy SCLP7.1 by increasing traffic movements in the area without encouraging non-car modes of travel.

Felixstowe Town Council highlighted the need for Policy SCLP7.1 to address the fact that a significant number of people prefer or need to use a car as a mode of transport, and to therefore ensure that new developments provide adequate parking and suitable road widths.

The Chairmen of Brandeston, Kettleburgh and Easton Parish Councils expressed their **objection** to proposed allocations in Brandeston and Kettleburgh, in that, they will contravene Policy SCLP7.1 by increasing traffic movements in the area.

Bawdsey Parish Council highlighted that Policy SCLP7.1 fails to establish any meaningful future network provision for cycle ways. The Plan itself does not contain any real vision for cycling. It is stated that the Transport section does not demonstrate any aspirations for encouraging cycling and instead concedes that the car is the dominant form of transport. Cycling should be given higher consideration where public transport is not deemed feasible. For example, Policy SCLP7.1 only refers to the enhancement of existing cycleways and does not mention establishing new cycleway routes to essential local services. Cycle ways should feature as a central fully connected arterial network to be established for all future housing developments.

Hacheston Parish Council stated that there is continuing concern about the enormous impact that the proposed Sizewell Park and Ride site would have on Hacheston and surrounding villages. They have also expressed concern with the implementation of part (g) of Policy SCLP7.1 as larger developments have been previously approved at Framlingham that have increased traffic in the area. Regarding the threshold for Travel Plans, the Parish Council feels that this has come too late in the day. They also highlighted the fact that rail transport is not sufficiently referred to in the Local Plan and that it is vital not just for Felixstowe but also for Sizewell C. They feel that a statement should be made about how development of the non-road transport network is essential for the well-being of residents in the District who live along the A12 north of Ipswich. The ability to find parking spaces in towns and better public transport, especially railways, is essential.

Westerfield Parish Council comment that SCLP7.1 should include reference to improving existing transport services in line with the housing growth, particularly in rural areas where there is no requirement for a new Travel Plan. Rail services to Westerfield have declined. The Council should work with bus and train operators to improve existing services.

### **Other organisations**

Sandlings Safer Cycling Campaign considers that developments of 30 dwellings or more should qualify for Travel Plans. They are also of the opinion that the proper provision of safe cycling routes between settlements and for recreation should be included in the plan.

### **Developers/Landowners**

Strutt & Parker LLP expressed general **support** for Policy SCLP7.1, particularly part (g), given the need to manage the traffic impacts of consented schemes due to be brought forward in the near future. Less reliance on the use of the private car helps towards healthy lifestyles which must be seen as a goal for development in Suffolk Coastal.

### **Members of the Public**

Support

None received

Objections

The limit for the number of dwellings requiring a Travel Plan is too high.

Money should be provided through CIL for the provision or enhancement of safe, off-road cycling and walking routes between the development and the nearest place where safe routes already exist.

People should be encouraged to use non-car modes of transport not just for getting to school or work but also for health purposes.

Developers should bare the cost of introducing speed limits where these do not already exist.

No amount of transport assessments will alleviate the adverse cumulative impacts of new development on the existing transport network.

Policy SCLP7.1 implies a carte blanche to put in highways wherever there are dwellings or 80 houses or so without defining any restrictions on the size and type of those highways.

#### Observations

Use of the train lines could be improved through the opening up of the Olde Aldeburgh branch line, the duelling of the Lowestoft line, improved usage of Trimley Station, use of the disused platform face in Felixstowe Station and reopening of the Felixstowe Beach Station for limited services. This, along with providing improved bus services at Felixstowe through a local bus operator and creating a pier for the ferry to Harwich, could help to reduce car usage and give rise to better services.

Quiet Lanes Suffolk aims to survey travel needs for Martlesham, Waldringfield, Newbourne and Hemley to feed into the Brightwell Lakes Travel Plan. The survey will focus on the justifying the operation of a shuttle min-bus in the area. They have proposed amendments to the Highway Code that involves creating additional quiet lanes. This is supported by Suffolk Sustrans, BikeAbility and the Suffolk County Council Cabinet member for Highways. Quiet Lanes Suffolk estimates that villagers must walk 300m on average along a roadway in order to reach a foot path or bridle way. They feel that this may deter villagers from using Public Rights of Way. They also suggest a survey to list and prioritise where foot and cycleways need to be physically separated from the roadway as several contacts have highlighted this as a problem. Both Brightwell Lakes and the proposed east of Seven Hills business park should include provisions to facilitate pedestrian and cycles access to existing settlements and across the A12 and A14.

Concerned with current congestion and bottlenecks along the A12 and how this will be exacerbated by new development. Building in rural areas will mean that people will travel further to work because there are insufficient jobs local to the areas to avoid the need to drive long distances which is in direct contravention to the sustainability requirements in Policy SCLP7.1.

Two or more car sharing lanes that are integrated with bus lanes should be included to encourage car sharing.

Suggested the creation of an off-road cycle path linking up selected villages and towns which would provide considerable tourist value, particularly a route linking Orford, Sudbourne, Snape and Aldeburgh with an additional link between Orford via Butley to Melton station. This would also enhance the health and safety of the local community and reduce the number of cars on the road.

The B1116 through Hacheston has seen no sign of any improvement and the volume and speed of traffic through the village remains of great concern to both Hacheston Parish Council (HPC) and residents. If Sizewell C and the Park and Ride at the proposed location goes ahead, this will only get worse. They also question why Travel Plans haven't been undertaken for all recent development in Framlingham which, cumulatively, has had an effect on Hacheston in line with point (g) of Policy SCLP7.1. Development of the non-road transport network is essential for the well-being of residents in the District who live along the A12 north of Ipswich.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy and supporting text amended to ensure protection of public rights of way and the inclusion of reference to the test of severe impacts for Travel Plans in new developments. Thresholds for requiring a Transport Assessment and Transport Statement are amended to emphasize their indicative nature.

All proposed allocations were assessed on the basis of sustainability and suitability for development. On this basis, none of the proposed allocations were considered to be in contravention of this policy.

Policy SCLP7.2 addresses car parking in new developments.

Policy amended to include greater focus on cycling, in particular, the creation of new cycle routes as part of development proposals. When the Council merges to become East Suffolk Council it is anticipated that the current Waveney Cycle Strategy will be reviewed to include the Suffolk Coastal area.

Sizewell C is considered to be a project of national importance and is therefore being dealt with separately to this Local Plan Review process. However, where the remit of the Local Plan applies, policies such as SCLP3.4 'Proposals for Major Energy Infrastructure Projects' will be enacted. Further reference to rail transport has been included in relevant parts of the plan.

Criteria (f) of Policy SCLP7.1 clearly states that development will be supported where it will improve public transport in the rural areas of the District. The Council has also consulted transport providers to identify any infrastructural improvements required as a result of proposed growth in the Local Plan. These can be found within the Infrastructure Delivery Framework.

The Council considers the threshold detailed in criteria (i) of SCLP7.1 to be appropriate in light of travel plan guidance and the level of development historically delivered throughout the District.

Both Policy SCLP12.19 'Brightwell Lakes' and Policy SCLP12.20 'Land at Felixstowe Road, Nacton' include the provision of cycle and footway routes as requirements. SCLP12.20, in particular, encourages opportunities to enhance and link into the existing Public Rights of Way network.

Transport modelling conducted to inform this Local Plan Review has not indicated any significant insurmountable issues as a result of proposed growth.

It is not within the remit of the Council to dictate the layout of roadways. Roadway layouts are informed by Highways England and Suffolk County Council based on the transport modelling conducted to inform this Local Plan Review.

CIL may be used for the provision or enhancement of safe, off-road cycling and walking routes between developments and the nearest place where safe routes already exist if a suitable project comes forward.

Non-car modes of transport are clearly encouraged in Policy SCLP7.1 'Sustainable Transport'.

The costs of introducing speed limits are included in the estimated transport costs relating to each allocation.

## Vehicle Parking

Total comments	Support	Object	Observation
3	0	1	2

### Statutory Consultees

None received

### Parish and Town Councils

Trimley St Mary Parish Council supports the inclusion in the Local Plan of the “provision of safe, secure and convenient parking” due to the persistent parking problems experienced in their village. They ask that the District Council takes seriously its commitment to provide safe, secure and convenient parking considering the proposed development in their village.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Support:

None received

Objection:

There is no convenient space left in either Framlingham or Wickham Market to provide the necessary additional car parking required.

Observation:

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Council is working with Town and Parish Councils to alleviate parking concerns across the District through the East Suffolk Area Parking Plan. Policy SCLP7.2 seeks to compliment this process by helping to address parking issues across the District.

## Policy SCLP7.2 Parking Proposals and Standards

Total comments	Support	Object	Observation
3	0	0	3

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council acknowledged that they are aware of the current consultation regarding parking and Civil Parking Enforcement and will not be commenting.

### Other organisations

None received

### Developers/Landowners

The Home Builders Federation argues that Policy SCLP7.2 does not set out what is required of an applicant with regard to parking. They also argue that the policy is unsound as it does not comply with legislation that prevents the Council from setting policy in supplementary planning documents, which cannot be challenged through an Examination in Public. The Local Plan must set out its parking requirements in the local plan to ensure that any changes to parking provision will require a partial review of the local plan. This ensures that any significant changes in policy that could impact on the viability of development are fully considered and examined.

### Members of the Public

Support:

None received

Objection:

None received.

Observation:

Need to stop providing car parking on a “build it and they will come” basis which will cause road blockages creating issues for local residents and businesses.

### How these comments have been taken into account in the Final Draft Local Plan:

Policy SCLP7.2 refers to the 2015 Suffolk Guidance for Parking which is a Suffolk County Council document and not a supplementary planning document. This guidance, along with SCLP7.2, sets out the parking requirements for any proposed developments across the District.

## General Comments on Transport

Total comments	Support	Object	Observation
15	2	4	9

### Statutory Consultees

Historic England have stated that they have not had the time to review this chapter.

Suffolk County Council recognised that it is challenging to allocate further housing growth close to the County Town due to existing growth in this area. In this respect and based on sustainable transport merits, they expressed **support** for the large mixed use allocations at Saxmundham (SCLP12.26) and North Felixstowe (SCLP12.3) along with the wider Spatial Strategy. However, where opportunities for sustainable travel exist, it is imperative that they are taken up.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council noted that there is a complete lack of accessible public transport in the area and the majority of roads in the parish are single track. Sustainable transport on this basis is difficult and through initiatives like the acquisition of a lease on the central Kelsale Village car park, The Parish Council is trying to ease local parking congestion. The Parish Council is also concerned that development on any of the bi-directional roads in the parish will increase inconsiderate parking. Development on the majority of other roads would almost certainly require mitigation measures to widen the road for non-vehicular access.

Wickham Market Parish Council supports the use of the 2015 Suffolk County Council Guidance as a baseline; however, they are dismayed that 'Residential Parking Design' is not included. It is this aspect that has had a significant detrimental effect on rural communities as stated in the forward to the revised guidance. They are also concerned that no new car parks have been proposed and that the need to protect car parking provision has not been highlighted in the policy. They also suggested that there is need for further parking provision in Wickham Market to ensure that both workers and retail users are able to visit and park with ease. In a separate response, the Parish Council claim that this section is particularly weak.

The Leiston Town Clerk highlighted that this section does not appear to include any highway improvements other than parking provision.

Snape Parish Council highlighted that there are existing footpaths and bridleways between Snape and Saxmundham that could be utilised to improve connectivity. They also highlighted the continued degradation of bus services and how they are seeking to improve transport links around the village and to the railway at Saxmundham.

Levington & Stratton Hall Parish Council stated that this section is light on detail considering the level of residential and business growth proposed. It is difficult to see how sites can be considered, without more detail of traffic flow and movement, especially at existing junctions and required new ones.

Hacheston Parish Council raised concerns with the impact of the proposed park & ride facility for Sizewell and the major traffic pinch points along the A12 on the parish. They feel that part C of Policy SCLP7.1 is not being implemented in Framlingham which is having an impact on traffic in Hacheston. Regarding the final paragraph of the Policy SCLP7.1, the Parish Council are of the view that this will not be effective in retrospect of built out development. They also highlight that very little reference to rail is included in the Local Plan and that more references should be included. Rail, road and parking are highlighted as issues that should be better addressed in relation to the proposed development in the Local Plan.

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

Support:

Positive planning might be for new development's parking to be clustered rather than fragmented, so that it can be re-used for homes or businesses in the relatively near future. Not all conventional public transport is unsuitable for the local single track roads as there are mini-buses that use them.

A tunnel could be constructed under the River Orwell to link the A14 to the A120 at Harwich. That could also include a railway line, to reduce road traffic, especially from the Port.

Objection:

Concerned about the impact of increased housing density on road capacity. The document is entirely inadequate in its treatment of rail and bus capacity, both of which provide critical links in the region, as well as the expansion of mode-transfer car parking capacity at Melton, Campsea Ash and other interface locations. This weakness in the document is part of its broader weakness associated with the need to expand related infrastructure such as blue-light service capacity and access, schools, doctors' surgeries, etc.

Questionable if Felixstowe is a sustainable site for major housing and industrial development given the fact that there is only one major road access to it. Ipswich would be a better location for such development given its transport links.

Observation:

The Plan does not consider the increasing use of small country roads by large volumes of heavy goods vehicles. Some consideration of road development and restrictions to direct HGV traffic to appropriate roads is necessary.

Query why there is no reference to the Waveney Local Plan as the A12 Corridor is mentioned many times. The A12 North of Ipswich runs to the Bascule Bridge at Lowestoft, therefore it would be

helpful to have an understanding of the economic development of A12 route as it relates to Suffolk Coastal.

Kesgrave's bus service has been cut back. This should be acknowledged in the Local Plan in order to more accurately reflect its sustainability. Ipswich Buses do not run to Kesgrave and therefore Kesgrave should not be identified as part of an Ipswich Major Centre. Many of the cycle routes and footways are in poor condition. There should be a direct cycle route to Ipswich. Most local journeys are made by car.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The Council is working with Town and Parish Councils to alleviate parking concerns across the District through the East Suffolk Area Parking Plan. Policy SCLP7.2 seeks to compliment this process by helping to address parking issues across the District. Suffolk County Council and Highways England have advised of mitigation requirements as a result of transport modelling conducted to inform this Local Plan Review.

All proposed developments will be required to accord with SCLP7.2 which requires suitable parking provision based on the location, type and intensity of use proposed. Although there are no allocations where new car parks are specifically required, it is inherent for larger sites that such a facility will be required based on the need to provide suitable parking provision and the location, type and intensity of use. In light of comments regarding the protection of car parking provision, SCLP7.2 has been amended to allow for the protection of car parking provision. Residential parking design will be evaluated against design policy SCLP11.1 unless local planning considerations indicate otherwise.

Highway improvements relating to proposed growth in the Local Plan can be found within the Infrastructure Delivery Framework.

When the Council merges to become East Suffolk Council it is anticipated that the current Waveney Cycle Strategy will be reviewed to include the Suffolk Coastal area. The Council has consulted transport providers to identify any infrastructural improvements required as a result of proposed growth in the Local Plan. These can be found within the Infrastructure Delivery Framework.

Sites are allocated in this Local Plan based on consultation with Highways England and Suffolk County Council and the outcomes of transport modelling conducted to inform this Local Plan Review. The infrastructural requirements arising from this are detailed in the Infrastructure Delivery Framework.

Sizewell C is considered to be a project of national importance and is therefore being dealt with separately to this Local Plan Review process. However, where the remit of the Local Plan applies, policies such as SCLP3.4 (Proposals for Major Energy Infrastructure Projects) will be enacted. Further reference to rail transport has been included in relevant parts of the plan.

HGV traffic restrictions are dictated by Suffolk County Council and Highways England. Where planning applications involve HGV traffic movements, Highways England and Suffolk County Council will be consulted as to the appropriate course of action. Such a requirement is included in Policy SCLP12.35 (Innocence Farm) which is expected to involve HGV traffic movements.

Although there is no direct reference in the Local Plan to Waveney's Local Plan, reference is made throughout the document to Waveney District Council as a Local Planning Authority the Council is working in partnership with ahead of the creation of East Suffolk Council in April 2019. The Ipswich Economic Area Sector Needs Assessment is part of the evidence base informing this Local Plan. It details the economic development along the A12 corridor and how it relates to Suffolk Coastal and to parts of Waveney such as Lowestoft.

Kesgrave is part of an area that has a strong relationship with Ipswich; a relationship that is enhanced through the urban road corridors which provide access into and out of Ipswich town centre. The Settlement Hierarchy identifies that collectively these communities to the east of Ipswich represent a Major Centre. No evidence has been submitted that demonstrates that Kesgrave's bus service has been significantly cut back.

Policy SCLP7.2 clearly indicates where proposals involve public transport improvements or re-developments, the Council will encourage the provision of Park & Ride facilities.

Transport modelling conducted to inform this Local Plan Review has not indicated any significant insurmountable issues as a result of proposed growth. Transport issues relating to proposals in Felixstowe are considered to be mitigatable.

## 8 Community Facilities and Assets

### Policy SCLP8.1 Community Facilities and Assets

Total comments	Support	Object	Observation
12	3	1	8

#### Statutory Consultees

Owing to limited capacity Historic England have not reviewed this chapter.

Suffolk County Council highlight that the Plan protects community facilities through Policy SCLP8.1 and identifies medical facilities as a community facility which is not considered to cause detriment to the issues raised in the Pharmaceutical Needs Assessment for Suffolk.

#### Parish and Town Councils

Tunstall Parish Council supports the protection of registered assets of community value from change of use to non community facility uses.

Kelsale-cum-Carlton Parish Council note the contents of Policy SCLP8.1

Friston Parish Council note there is no mention of the community in the Plan so presumably the sites which have been suggested have been dropped. It is essential that the local authority support the campaign against Scottish Power substations and we hope that Policy SCLP8.1 and SCLP8.2 should help the future of the village green if ever in danger.

Little Bealings Parish Council comment that they support the re-opening of the Admiral's Head pub and has recently secured a further 5 year ACV listing. The Council supports maintaining the current usage of the Angela Cobbold Memorial Hall.

#### Other organisations

The Theatres Trust supports this policy for its protection of valued cultural facilities. The Trust made an additional comment that the Commercial Property Marketing Guidance must require marketing information of a community facility, the asking price/rental values, to reflect the existing condition of the facility and not base marketing information on development potential of the facility or the site.

Suffolk Constabulary suggest reference in paragraph 8.1 to "police facilities".

Sport England supports the policy in respect of protecting community facilities and assets. Only comment would be for the policy and supporting text to clearly define what is meant by a community facility. Small and large scale sports facilities (including village halls) should be included within this definition.

#### Developers/Landowners

Policy SCLP8.1 goes too far in terms of restrictions imposed on site/buildings in that it now extends control over and beyond the objective to retain identifiable community facility. If a use is no longer viable, it is patently wrong for the policy to mandate that the site owner should market the property just in case there is a buyer for a non viable business.

Important that large-scale strategic development creates places where communities can thrive, with community space bringing together residents from different neighbourhoods. Policy SCLP8.1 is especially pertinent with the proposed North Felixstowe Garden Neighbourhood and ensuring an appropriate amount of community provision is delivered is key as under delivery places additional pressure on existing facilities in the Felixstowe urban areas. Draft policy is in accordance with NPPF paragraph 92 which supports positive planning for community assets to promote healthy and safe communities.

Ipswich Town Football Club highlight that Policy SCLP8.1 must not be applied restrictively, particularly to sites that have a public perception of a community facility or open space when in reality they do not provide such facilities. Site at Playford Road (Ref 953) is considered to be public open space but have in fact been in private ownership for a considerable number of years.

### **Members of the Public**

Support:

None received

Objection:

With the plan to build 2000 new homes in Felixstowe, the financial gain of development is short sighted. Open spaces for recreation far outweigh the financial gains. Not everybody wants a leisure centre, we just need open spaces with trees and beautiful view that we currently have.

Observation:

Rather than build on the disused surgery in Felixstowe, the creation of a garden that nature could take over would attract wildlife and be a lovely focal point for all.

Post offices throughout the district should be classed as Community Assets. A considerable number of unused buildings within parishes should be brought back into use.

### **How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text has been amended to provide reference to a wider variety of community facilities as well as making specific reference to police facilities and the opportunity for large scale developments to create places where communities can thrive.

Policy has not been amended in light of the comments which suggest that it is too restrictive in respect of requiring the need for a non viable facility to be marketed for alternative uses. The Council consider that the policy approach is appropriate and through using the Marketing Guidance alternative community facilities can come forward over the plan period. Alternative community facilities support the needs of the community and therefore should not be lost without detailed consideration of alternative provision.

## Policy SCLP8.2 Open Space

Total comments	Support	Object	Observation
22	2	4	16

### Statutory Consultees

Environment Agency are pleased to see Policy SCLP8.2 but would like to see a stronger message towards habitat creation or enhancement. Any open space should not be considered as surplus to requirements.

Suffolk County Council welcomes Policy SCLP8.2 but outline that this need to be allied to policies on sustainable travel. Wording changes proposed to paragraph 8.8 and Policy SCLP8.2

Natural England recommends that the policy is expanded to include green infrastructure, net gain and SANGs. This may be informed by the Local Plan Appropriate Assessment.

### Parish and Town Councils

Tunstall Parish Council supports the requirements on development to provide for open and recreational spaces and the protection from loss of open and recreational spaces as a result of development.

Trimley St Mary Parish Council are delighted to see that the Local Plan supports the provision of national standard in relation to open space and recreational facilities. The Parish Council however highlight that the parish falls well short of this provision and the Local Plan should address this deficit.

Kelsale-cum-Carlton note the content of Policy SCLP8.2.

Felixstowe Town Council strongly supports Policy SCLP8.2. There is a general need for existing open spaces to be preserved, enhanced or otherwise re-provided to ensure that all residents have easy-access to informal recreational green space. Particularly relevant in respect of Grove Woodland and Eastward Ho.

Friston Parish Council note there is no mention of the community in the Plan so presumably the sites which have been suggested have been dropped. It is essential that the local authority support the campaign against Scottish Power substations and we hope that Policy SCLP8.1 and SCLP8.2 should help the future of the village green if ever in danger.

### Other organisations

Rambles Association are concerned how developments mesh with the existing footpath and cycle networks and how new footpaths and cycle access are facilitated within developments

Westover Landscape Ltd highlight that details regarding the management of open and green spaces should be included in the policy or supporting text. Details should include the suitable bodies and the mechanisms for management of open spaces that are available to development proposals.

Sport England supports the protection of existing open space for outdoor sport and the criteria uses is similar to Sport England's playing fields policy and paragraph 97 of the NPPF. Sport England does not support the use of standards for securing open space for sport as part of new developments, because it takes no account of the local evidence base and local spatial variations in existing provision and future needs.

### **Developers/Landowners**

Final version of the policy must ensure flexibility to allow the masterplan for the North Felixstowe Garden Neighbourhood to be able to provide higher quality open space in replacement of lower quality space. Current policy is considered to be partially restrictive in the terminology and it would be more beneficial to amend the policy wording to require an equivalent or improvement to the quality OR quantity of open space provision.

Ipswich Town Football Club note that Policy SCLP8.2 makes reference to proposals that result in the loss of open space will only be permitted in exceptional circumstances. This should not be applied restrictively as land currently owned by Ipswich Town does not provide any open space or form playing pitches for the community. It is therefore recommended that this area of land is removed from future policy identification.

### **Members of the Public**

Support:

None received

Objection:

Policy 8.2 states that the Council supports the provision of open space and recreational facilities, so why does the Local Plan want to build homes in the Gulpher Road area of Felixstowe? It is the last open countryside we have left in Walton.

It seems wrong to remove the Eastward Ho complex when it is the largest in the area and it is also wrong to move the existing facilities at Brackenbury and the Leisure Centre when there is a shortfall to start with.

Land at Eastward Ho and Brackenbury is enjoyed by vast numbers of people, please leave something for us before it is all gobbled up for financial gain.

Open space in Felixstowe is rapidly disappearing and there is nothing in Policy SCLP8.2 that supports the garden neighbourhood proposal. The Grove is a great place where generations of Felixstowe people have played and walked.

Replacing open space at North Felixstowe with a leisure centre does not equate to equal provision. The free open space provides different benefits to the leisure facility such as being available for all to use (children, elderly, and dogs) and mental wellbeing, which will consequently be lost should the open space be developed over. Redevelopment of Brackenbury Sports Centre will also result in the loss of open space.

**Observation:**

Local Plan should designate new open spaces and footpaths much like it designates new housing sites.

Areas of green and open space such as The Grove and Eastward Ho (Felixstowe) are vital for leisure activities and need to remain. This type of area is rather sparse in Felixstowe and they need to be extended rather than curtailed.

The Council should require suitable areas of usable amenity space, adequate to accommodate the demands for passive recreation generated by residential development. The Council should adopt the Fields in Trust guidance for outdoor sport and play for England. All settlements should have sufficient locally equipped areas for play which are close and safely accessible on foot as per the FiT guidance. Where sufficient provision is not made, car use is needed or habitats are harmed.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy SCLP8.2 and the supporting text have been revised to include amendments suggested from Statutory Consultees

The national standards of provision are maintained as these are the standards on which the Suffolk Coastal Leisure Strategy is based and therefore considered to be appropriate despite objection from Sport England. However to reflect the comments from Sport England, the supporting text has been amended to highlight that local evidence can be used to show an alternative approach if appropriate.

Supporting text amended to provide distinction between countryside locations which provide a visual sense of open space compared to the provision of open space covered by this chapter which is through a variety of formal and informal provision.

Details of how open spaces associated with future development will be delivered and managed are included within the Infrastructure Delivery Framework which supports the Local Plan.

Comments relating to North Felixstowe have been addressed through the specific area strategy for Felixstowe which provides further details and clarification in respect of the Garden Neighbourhood.

## Policy SCLP8.3 Allotments

Total comments	Support	Object	Observation
7	3	0	4

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council note the content of Policy SCLP8.3.

Wickham Market Parish Council fully support Policy SCLP8.3.

Felixstowe Town Council supports Policy SCLP8.3.

### Other organisations

Felixstowe Society of Allotment and Leisure Gardens welcome Policy SCLP8.3. Where new major developments such as Garden Neighbourhoods, land should be set aside for allotments as the ability of Town and Parish Councils to find and afford suitable land at a later date is very limited.

### Developers/Landowners

Roxlight Holdings support the view that allotments are valuable community spaces but the Plan should acknowledge that millennials lifestyle differ significantly from past generations. Policy SCLP8.3 should carry forward part of DM33 which requires evidence to show that there is unlikely to be future demand for allotments as this would future proof the allotments and allow redevelopment should there be no demand later in the plan period. Proposed wording changes to Policy SCLP8.3

### Members of the Public

Support

The policy on allotments is welcome, the Cow Pasture allotments together with Abbey Grove Woods (Felixstowe) will provide important green space if the urban area is increased.

Object

None received Observation

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text to the policy has been reworded to highlight that the provision of allotments is to be included within the master plans for the Garden Neighbourhoods if required over the plan period. The comments highlighting support for allotments are already reflected within the text.

Policy SCLP8.3 has been reworded to include reference to the loss of allotments being resisted unless evidence is provided that there is no future demand for allotments.

## Policy SCLP8.4 Digital Infrastructure

Total comments	Support	Object	Observation
5	1	0	4

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council highlight the huge deficit in reliable, high quality, high speed broadband and mobile services in the countryside. The Plan remains surprisingly unclear on the what, where, when, who and how this appealing state of affairs will be resolved. Kelsale-cum-Carlton Parish Council request that the actions of the East Suffolk Business Plan be manifested into tangible actions.

Felixstowe Town Council highlight that mobile, broadband and digital TV communication is a particular issue in parts of Felixstowe and it is essential that this must be improved for the economic development and wellbeing of the town.

Levington and Stratton Hall Parish Council welcome and support the improvements not only for their parish but the wider rural district.

### Other organisations

The Aldeburgh Society support the mention of digital infrastructure.

### Developers/Landowners

None received

### Members of the Public

District Councillors

Cllr Christine Block outlines that it is increasingly imperative that all households and businesses are able to access a workable broadband connection and wireless connectivity may be a realistic option for people living in rural areas.

No other comments received from members of the public

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text has been updated to provide more clarification on the provision of digital infrastructure across the District, as well as further reference to the East Suffolk Enabling Broadband Programme which complements the improvements undertaken by commercial service providers.

Further information in respect of the increasing significance of digital infrastructure to every day life has also been recognised further within this chapter as well as Chapter 2 and Policy SCLP2.2 which considers Strategic Infrastructure Provision (including digital infrastructure).

## 9 Climate Change

### Policy SCLP9.1 Low Carbon and Renewable Energy

Total comments	Support	Object	Observation
9	2	0	7

#### Statutory Consultees

Suffolk County Council AONB Team have noted that the supporting text to Policy SCLP9.1 does not include reference to the potential for renewable energy schemes to adversely impact the natural beauty and the special qualities of the Suffolk Coast & Heaths AONB. To this end, they have recommended an addition to both the supporting text and the wording of Policy SCLP9.1 to clarify that renewable energy proposals within the AONB or its setting should be thoroughly assessed in terms of potential impacts on the natural beauty and special qualities of the nationally designated landscape.

The Marine Management Organisation suggested the inclusion of references to Policy WIND1, WIND2 and EC3 relating to offshore wind energy.

#### Parish and Town Councils

Bawdsey Parish Council expressed their dismay with the lack of consideration for small scale low carbon and renewable energy schemes in the Renewable Energy section. They feel that this will allow housing developers to avoid the need to install any energy efficient devices. They state that the principal opportunity for future housing stock to contribute to energy sustainability is through the provision of renewable solar energy in particular by solar PV and solar hot water. They note that the ability of a house to benefit from solar gain depends very much on its orientation. They feel that the Plan should encourage all new housing developments to either provide solar energy or at least make provision to accommodate it as a default standard. Favourable consideration should also be given to proposals for Higher Energy Rated housing.

Aldringham-cum-Thorpe Parish Council requested clarity whether, for wind energy, the backing of the local community is required for substations or wind turbines.

#### Other organisations

None received

#### Developers/Landowners

Evolution Town Planning on behalf of Bentwaters Parks Ltd highlighted that former airfields are inherently suitable for a range of renewable energy developments because of their large scale nature and the on-site infrastructure they benefit from. They also requested that it be made clearer that the 'areas identified as suitable' will be identified in the proposed SPD. Clarification is requested

for criteria C of Policy SCLP9.1 as it could potentially be difficult to identify specific local benefits. Rewording or removal of criteria C is suggested.

Evolution Town Planning on behalf of Base Business Park repeated the same suggestions as they did on behalf of Bentwaters Parks Ltd. They also noted that the thrust of Policy SCLP9.1 is supported by the NPPF.

### Members of the Public

#### Support

The need for a low carbon and renewable energy policy but believes that it needs to be stronger and more determined. There needs to be more emphasis on the net contribution to lowering carbon emissions as well as being mindful of the associated environmental impacts. All new homes and commercial buildings should be built with integrated renewable energy facilities. Valid applications should be assessed as to their impact - positive and negative and with realistic mitigation measures to minimise impacts and strive for the most up to date technologies. Suggested a balanced assessment of the proposed renewable energy facility against the standard fossil fuel equivalent in terms of life cycle analysis and carbon footprint.

#### Object

None received

#### Observation

Biomass schemes do not necessarily represent an efficient use of resources i.e. maize used in biomass proposals could be better used to provide livestock with fodder and to create soil organic matter (SOM).

### How these comments have been taken into account in the Final Draft Local Plan:

Policy and supporting text amended to emphasise the need to examine the potential for renewable energy schemes to adversely impact the AONB and its setting.

Supporting text amended to include reference to East Marine Plan policies.

Policy SCLP9.2 'Sustainable Construction' allows for solar panels to be installed on new or converted dwellings in line with the Building Regulations. For new developments of more than 10 dwellings, developers will be required to meet higher energy efficiency standards than those set out in the Building Regulations; this includes the installation of solar energy devices. The policy was also amended to include reference to building orientation as recognition of the importance of building orientation in achieving energy efficiency.

The threshold for wind energy developments, as identified in the National Planning Policy Framework, is one or more turbines. On this basis applicants must demonstrate community support for the scheme as a whole including turbines and substations.

The Council is clear in stating that a Supplementary Planning Document will be undertaken

following the completion of the Local Plan Review to inform low carbon and renewable energy development. The Council considers it appropriate for criteria (c) of SCLP9.1 to require benefits to the surrounding community when a low carbon and renewable energy development is not located within an area identified as suitable for renewable or low carbon energy.

Policy SCLP9.1 and SCLP9.2 strive for high standards in relation to low carbon and renewable energy schemes and energy efficiency in new residential and non-residential developments. The Council considers that these policies represent a betterment of building regulation standards and of national guidance.

## Policy SCLP9.2 Sustainable Construction

Total comments	Support	Object	Observation
13	2	2	9

### Statutory Consultees

Anglian Water suggested some minor amendments to wording in paragraph 9.14. They also stated that they are **supportive** of Policy SCLP9.2 as it adopts the higher standard of water efficiency. They refer to government research which highlights that this can be achieved at a cost of £6-9 pre dwelling which would not make development unviable.

The Marine Management Organisation suggested the inclusion of reference to Policy CC2 in the supporting text to the policy or the policy itself. It reads as follows “Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal”

Suffolk County Council state that Policy SCLP9.2 should encourage the minimisation of waste arising from construction. They suggest an amendment to the policy in this regard. The County Council also suggest the inclusion of policy and design approaches which would encourage and manage the provision of ‘bring sites’, where justified by virtue of the size of the development or the level of existing provision in the area. This would help reduce demand on HWRCs, as well as encouraging recycling. Bring sites are generally located in publicly accessible areas and typically include a number of containers allowing separate collection of materials for recycling.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council expressed reservations about paragraph 9.17 of the First Draft Local Plan in that it precludes active involvement of the community in agreeing an exception where practicality and affordability are cited as concerns. Furthermore, they expressed concern that this would result in the developer’s profitability being afforded preferential treatment.

Wickham Market Parish Council expressed **support** for Policy SCLP9.2; however, they felt that it should apply to all new development regardless of the number of dwellings.

### Other organisations

None received

### Developers/Landowners

Armstrong Rigg Planning on behalf of Hopkins Homes expressed their **objection** to Policy SCLP9.2 as it will introduce an unnecessary burden leading to increased costs which in turn could impact adversely on development viability and housing delivery, particularly for sites of less than 50 dwellings. They note the inclusion of provision for exceptional circumstances; however, they feel that this would serve to significantly delay proposals coming forward while matters are agreed. They argue that there is no proportionate evidence suggesting why Building Regulations should be

bettered and the policy is not considered to be justified in this respect and therefore unsound. They suggest amending Policy SCLP9.2 in line with national Building Regulations, in terms of reduction in CO2 emissions.

### Members of the Public

District Councillors

District Cllr Block highlights that the requirement to higher energy efficiency standards for sites of 10 or more dwellings will not benefit rural areas to the same degree as urban parts of the District. Smaller, rural developments of less than 10 dwellings will see lower standards of construction and, potentially, a growing housing stock which does not meet high energy efficiency targets.

Support

**Supports** the policy in principle but believes it could more stringently enforce the 20% reduction. BREEAM standards should be good or excellent. All new residential and non residential development should have renewable energy facilities built into them. Although cost will inevitably play a part, early integration of carbon reduction technology into the design could help to offset this and reduce the need for additional add on costs.

**Supports** the policy but believes it does not go far enough. It is suggested that the cheapest and most efficient time to build renewable power and heat generation into homes is when they are being constructed. This will reduce the cost and therefore the benefit to residents in terms of lower cost for energy bills and less disruption to installing post construction. Installation of electric car chargers on street or in premises should be mandatory for all new builds. Power storage should also be considered for all new builds to reduce demand at peak times.

Object

None received

Observation

Recycled plastic should be used to tarmac the roads to reduce the amount of waste going to landfill and to increase the longevity of the roads. It was also suggested that covering manholes with the same type of recycled material could add to the enjoyment and safety of the roads for cyclists. A company called Macrebur was cited as an example for a potential product.

All new houses should be zero carbon. The site layout can be designed to maximise solar gain in the winter and buildings designed to minimise solar gain in the summer. It is suggested that developers could factor into the price of the land any extra costs for making development zero carbon.

Solar PV, grey water systems and thermos/biomass heating should be introduced as standard for all new builds.

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text amended to clarify minor wording errors and to include reference to East Marine Plan policies.

Policy wording amended to encourage the minimisation of waste arising from construction. Policy wording relating to 'bring sites' was considered appropriate to include within policy SCLP3.5 'Infrastructure Provision'.

The Council commissioned a viability assessment of the whole Local Plan in line with national guidance. This assessment demonstrates that the whole plan is viable. When submitting an application for planning permission, a developer will be required to demonstrate a change in build costs or land prices, for example, to demonstrate the development is not viable in respect of sustainable construction. This caveat is carried forward from Policy DM24 in the current Local Plan.

Policy SCLP9.2 was not expanded to include all new developments regardless of the number of dwellings due to concerns surrounding viability. Energy efficiency standards set out in the Building Regulations will apply to developments of 10 or less dwellings in this respect.

The government has recently clarified that Local Planning Authorities can require energy efficiency standards above and beyond the standards set out in the Building Regulations. To be specific, the March 2015 Ministerial Statement enables local planning authorities to require energy efficiency standards that exceed Building Regulations provided these do not exceed the requirements of level 4 of the former Code for Sustainable Homes. This equates to around a 20% improvement in CO2 emissions performance above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations. A similar policy relating to sustainable construction is applied in Ipswich that aims to achieve a 19% improvement in CO2 emissions performance above the Target Emission Rate.

It is inherent that carbon reduction technology will be built into the design of any development as this would assist the developer in complying with the Building Regulations and Policy SCLP9.2, where it applies.

It is not within the remit of the Council to dictate the layout of roadways. Roadway layouts are informed by Highways England and Suffolk County Council based on the transport modelling conducted to inform this Local Plan Review.

Policy SCLP9.2 was amended to include reference to building orientation as recognition of the importance of building orientation in achieving energy efficiency.

Policy SCLP7.2 'Parking Proposals and Standards' requires appropriate provision of vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles for proposals involving vehicle parking. Added to this, policy SCLP9.7 'Holistic Water Management' requires all new developments to include water efficiency and re-use measures.

## Coastal Management policies

Total comments	Support	Object	Observation
3	0	0	3

### Statutory Consultees

The Marine Management Organisation comment that there are further policies in the East Marine Plans that could be referred to including economic policies EC1 and EC2, governance policy GOV1, social and cultural policy SOC1 and tourism and recreation policies TR1, TR2 and TR3.

### Parish and Town Councils

None received

### Other organisations

The East Suffolk Water Abstractors Group noted that the coastal region is also an area of agricultural production which requires recognition. Loss of grassland to flooding and pollution of water abstraction points are highlighted as issues in this regard. There is a need to consult and cooperate with landowners in order to reach a positive outcome for agricultural production in coastal areas.

The Deben Estuary Partnership stated that this section does not recognise that Estuary Plans set out the agreed Flood Risk Management Strategy for each estuary. Also, there is no reference made to the role of the IDB.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Supporting text amended to include reference to East Marine Plan policies and to loss of agricultural land in coastal areas.

Supporting text in the Flood Risk & Holistic Water Management section includes a link which details the role of each Flood Risk Management Authority, including the Internal Drainage Board. Supporting text in this section also states that the Council will work with communities and stakeholders to help combat flood risk. Communities and stakeholders includes organisations such as the Deben Estuary Partnership.

## Coastal Change Management

Total comments	Support	Object	Observation
7	2	2	3

### Statutory Consultees

Natural England expressed their **support** for Policy SCLP9.3, particularly the inclusion of no new permanent residential development within the coastal change management area.

### Parish and Town Councils

Felixstowe Town Council stated that CCMA's are not relevant for the vast majority of Felixstowe as the 'intent of management' is to 'hold the line'. Where the 'intent of management' is to 'hold the line' a CCMA is not required as the area is not expected to be affected by physical changes to the coast.

### Other organisations

The Deben Estuary Partnership are unclear as to why the red line of the Coastal Change Management Area in the Policy Maps stops at the mouth of the Deben. If the reason relates to private ownership or another designation this should be explained. They also suggest that there is no logical choice for reference to a '20 year time horizon'. They request further explanation and text on the nature of coastal change.

The Aldeburgh Society expressed their **support** for the Climate Change section of the plan.

### Developers/Landowners

EDF Energy state that there can be confusion in relation to the role of National Policy Statements and the Local Plan. Paragraph 3.132 and Strategic Policy SP13 set out the position very clearly and it would be helpful if the Local Plan could set out a similar approach.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Policy maps relating to Coastal Change Management Areas (CCMA's) are derived from data included in the Shoreline Management Plan (SMP). The SMP infers a Hold the Line (HTL) approach south of the River Deben. Policy SCLP9.3 does not implement a CCMA in areas where there is a HTL approach in line with national guidance.

The 20 year time horizon was chosen as it represents a realistic timescale for landowners,

developers etc. to consider coastal adaptation measures for their land or property. This 'time horizon' is carried forward from the Site Allocations Document, in particular Policy SSP43.

Section 3 clearly states the role of the Local Plan in relation to nationally important projects such as Sizewell C. This is particularly addressed in paragraph 3.55.

## Adapting to a Changing Coast

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council noted the importance of taking a pragmatic approach when allowing coastal communities to thrive in their coastal locations, particularly in relation to coastal rollback and/or relocation.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No amendments to policy or supporting text were required as a result of comments received.

## What is Currently Anticipated to be at Risk?

Total comments	Support	Object	Observation
4	1	0	3

### Statutory Consultees

The Environment Agency highlighted the following concerns with Policy SCLP9.4:

- Relocation costs for landowners are not alleviated by this policy. Suggested offering 2 for 1 rollback opportunities which would offset the high cost of relocation and encourage uptake of rollback opportunities.
- Limiting the scope of the policy to proposals “to be affected by erosion within 20 years of the date of the proposal” does not encourage proactive adaptation. It is recommended to identify and zone opportunities for rollback and/or relocation to alleviate the issue of landowners holding onto their property until the last moment.
- The premise of relocating community facilities under threat from coastal change should be expanded to the whole of the District and not limited to areas accessible to the coastal community from which it was displaced.
- Requiring residential dwellings to be relocated outside of the CCMA could prevent proposals for re-locatable dwellings within the CCMA (as replacement dwellings) from coming forward. It is stated that a property that can be easily lifted and wholly removed from the erosion risk zone represents a considerable improvement in the sustainability of a residential site versus a landowner taking no action to adapt. This could provide a viable option
- Recommended to consider the development of a Coastal Change Supplementary Planning Document, as per Waveney District Council’s Local Plan. Also recommended the inclusion of an adaptation section to assist landowners.

The RSPB **supported** the wording of paragraph 9.43 but recommended incorporating it into Policy SCLP9.4.

Natural England expressed their **support** for Policy SCLP9.4, particularly the inclusion of no new permanent residential development within the coastal change management area

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The suggestion of allowing properties at risk to be replaced by two properties is not supported as there is no evidence to suggest that this would be necessary to facilitate relocation and would result in unnecessary development in the Countryside. Policy SCLP9.4 already allows for the construction of replacement dwellings on land outside of Settlement Boundaries defined by Policy SCLP3.3 where new residential development would not be permitted. There are numerous options on how this could be utilised which involve no net costs to the owners of dwellings at risk. For example, selling the existing property at risk to a landowner or developer who owns land outside of the Coastal Change Management Area who could then obtain and benefit from the planning permission for the replacement unit at no cost to the original owner. A scheme similar to this was undertaken in North Norfolk, where the Council purchased the dwellings at risk, and secured planning permission for their replacement on an alternative site.

The suggestion of extending the timeframe for relocation is not considered necessary and could result in properties being lost from a community before it is necessary, undermining the sustainability of that community.

The suggestion that commercial and community development should be allowed to relocate anywhere in the District is not considered appropriate or necessary. The main driver behind allowing relocation of these uses is to help sustain the coastal communities affected by erosion and relocation to elsewhere would not achieve this goal. For many types of commercial development, such as tourism development, which is within the Coastal Change Management Area, other policies of the Local Plan already provide flexibility in terms of location. Community facilities which serve an existing community clearly need to be relocated in a location accessible to that community.

The Council feels that sufficient flexibility has been incorporated into Policy SCLP9.4 in order to be effective especially when considered in tandem with other policies in the plan.

When the Council merges to become East Suffolk Council, Waveney's Coastal Change Supplementary Planning Document will be reviewed to incorporate the Suffolk Coastal area.

Policy wording amended to include reference to exacerbation of coastal squeeze.

## Policy SCLP9.5 Flood Risk

Total comments	Support	Object	Observation
8	4	1	3

### Statutory Consultees

The Environment Agency expressed full **support** for Policy SCLP9.5, stating that it contained all of the information they would expect to be covered in relation to flood risk in the District.

Suffolk County Council recommended an amendment to paragraph 9.44 to better reflect the responsibilities of the District Council for flood risk management. They also recommended an amendment to Policy SCLP9.5 to take account of surface water exceedance routes.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council expressed **support** for Policy SCLP9.5. Felixstowe Town Council also expressed **support** for Policy SCLP9.5.

### Other organisations

The Aldeburgh Society expressed their **support** for this section of the plan.

The Forestry Commission comment that the planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.

### Developers/Landowners

None received

### Members of the Public

Support

None received

Object

Objection to the excessive construction proposed across the District as it is normal to put tarmac and concrete on employment and residential builds making the risk of flooding from rainwater greater. The Council should realise that water will be an expensive resources in the future and that desalination is being considered as a means of water supply nationally.

Observation

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text amended to better reflect the responsibilities of the Council for flood risk management. Policy wording amended to take account of surface water exceedance routes.

The policy encourages the use of natural flood management measures that compliment existing flood defences.

The Council is aware of the prospect of a desalination plant coming to fruition over the lifetime of the plan. However, this is likely to be in the latter period of the plan and is not yet committed to by Anglian Water.

Policy SCLP9.6 'Sustainable Drainage Systems' requires new development to meet the greenfield runoff rates or a betterment of at least 30% of the brownfield runoff rate. This will not result in the use of impermeable surfaces such as concrete and tarmac in new developments, except where it is demonstrated that there is no better alternative.

## Policy SCLP9.6 Sustainable Drainage Systems

Total comments	Support	Object	Observation
8	2	0	6

### Statutory Consultees

Anglian Water expressed **support** for Policy SCLP9.6 as it is in accordance with the surface water hierarchy and would help to ensure that new development does not increase the risk of surface water and sewer flooding.

The Environment Agency **support** Policy SCLP9.6 in their response. However, they requested inclusion of a direct reference to objectives of the Water Framework Directive of no deterioration and improvement in water body status.

RSPB highlighted the fact that the repeated use of the wording “where possible” in Policy SCLP9.6 weakens the strength of the policy and does not provide clarity as to when Sustainable Drainage Systems should be implemented in a proposal.

Suffolk County Council feel that paragraph 9.55 should be framed in a more positive way to emphasise how Sustainable Drainage Systems can be effectively integrated into development. They expressed their support for paragraph 9.56-9.58. They highlight that Policy SCLP9.6 does not accurately reflect the positive wording surrounding Sustainable Drainage Systems in the NPPF and suggest amendments to the policy.

### Parish and Town Councils

None received

### Other organisations

Westover Landscape Ltd welcomed and **support** Policy SCLP9.6. They also emphasised the need to enforce this through vigilant Development Management assessments. The Sustainable Drainage Systems must also be considered separately to the provision of usable recreation space and play areas.

The Home Builders Federation have noted that on many brownfield sites it may be impossible to achieve green field run off rates. They refer to guidance by DEFRA which states that a brownfield development must be as close as practicable to green field run off rates. They suggest that greater flexibility should be provided within the policy considering the government’s focus on delivering more developments on brownfield sites. In this respect, they suggest an amendment that requires post development run off rates to be reduced ‘as far as practicable’ below existing run off rates.

The Suffolk Wildlife Trust expressed their **support** for Policy SCLP9.6. They agree with the biodiversity improvement aspect of the policy and emphasise that this should be maximised.

### Developers/Landowners

None received

**Members of the Public**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text and policy amended to take account of deterioration and improvement in water body status, local designations such as Source Protection Zones and to be more positively worded in line national guidance.

“Where possible” deleted from policy.

Efficient use of land such as the use of an area for Sustainable Drainage Systems and for green infrastructure purposes is considered appropriate where health and safety issues do not arise as a result of this.

The requirement for new development to be restricted to greenfield runoff rates or a betterment of at least 30% over brownfield runoff rates on previously developed sites is derived from the Council’s recent Strategic Flood Risk Assessment (SFRA). Defra guidance relating to Sustainable Drainage Systems was published in 2015, whereas the SFRA was completed in 2018.

The Council is of the view that this policy appropriately maximises biodiversity improvements in Sustainable Drainage Systems schemes.

## Policy SCLP9.7 Holistic Water Management

Total comments	Support	Object	Observation
6	0	1	5

### Statutory Consultees

Anglian Water generally supports Policy SCLP9.7 subject to some recommended amendments to clarify the requirements both in terms of phasing of water and water recycling infrastructure and water efficiency/re-use.

The Environment Agency broadly **supports** Policy SCLP9.7. However, they recommend the inclusion of a sentence to ensure that there is no occupation of dwellings until the scheme for improving the existing sewage system has been completed where required.

### Parish and Town Councils

None received

### Other organisations

The East Suffolk Water Abstractors Group stated that planning powers should be extended to ensure all planned developments include the provision for rain water harvesting and grey water recycling.

### Developers/Landowners

Armstrong Rigg Planning on behalf of Hopkins Homes argued that Policy SCLP9.7 may have the consequence of delaying the delivery of housing by unnecessarily introducing a phasing requirement, even on smaller sites. They also argue that there is no evidence or reasoning to underpin the policy and such a matter is not addressed in national policy. They request the deletion of this policy.

### Members of the Public

Support

None received

Object

None received

Observation

All new developments irrespective of size should be required to minimise water and energy use.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy amended to include greater certainty regarding phasing of water and water recycling infrastructure and water efficiency/re-use. Policy amended to include all development.

The Suffolk Coastal & Waveney Strategic Flood Risk Assessment details the need for a holistic approach in the wider context of the water cycle and local environment. This approach is also emphasised in the Suffolk Coastal & Ipswich Borough Cross Boundary Water Cycle Study.

## General Comments on Climate Change Chapter

Total comments	Support	Object	Observation
3	1	1	1

### Statutory Consultees

Historic England have stated that they did not have the time to review this section.

### Parish and Town Councils

Bawdsey Parish Council highlighted that this section of the Plan clearly states current approaches to climate change and issues facing coastal areas. They note that the Shoreline Management Plan is very significant for their community's economic future.

### Other organisations

The Deben Estuary Partnership expressed their **objection** to various aspects of this section.

### Developers/Landowners

None received

### Members of the Public

Support

None received

Object

None received.

Observation

We should recycle at a low cost rate without involving large companies focussed on profit. We should use proven renewable techniques to help the environment whilst keeping with the rural charm of the area without blighting the countryside.

### How these comments have been taken into account in the Final Draft Local Plan:

Within the Coastal Change Management section the Council has expressed a willingness to expand the boundary and the principles of Coastal Change Management Areas to the estuaries of the District in line with Shoreline Management Plans in other parts of the country.

Coastal Erosion Vulnerability Assessments (CEVAs) are principally used for coastal erosion purposes. It is not considered appropriate to expand the remit of CEVAs to assess breach of defences and flooding as a result of surge tides and extreme storm events. Such eventualities are assessed as part of flood risk assessments.

It is not within the remit of the Local Plan to address concerns regarding how we recycle our waste. There are, however, a number of aspects of the Local Plan that encourage recycling such as the support for the provision of waste management infrastructure in Policy SCLP3.5 'Infrastructure Provision' and the encouragement of the re-use of recycled materials in Policy SCLP9.2 'Sustainable Construction'.

## 10 Natural Environment

### Paragraphs 10.1 – 10.15

Total comments	Support	Object	Observation
9	0	2	7

#### Statutory Consultees

Historic England state they have not reviewed this chapter.

Natural England note that this section is missing a policy relating to soils. They request that the Plan recognises that development has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value should also be considered as part of ecological connectivity. Reference should be made to the Defra Code of practice for the sustainable use of soils on construction sites.

#### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 10.1 and 10.2 are noted.

Bawdsey Parish Council note the key importance of this section for the economic and social life of the area.

#### Other organisations

RSPB – Paragraph 10.2 should be amended to state ‘protect *and enhance*’ to be consistent with paragraph 170 of the NPPF.

#### Developers/Landowners

Gladman Developments Ltd. state that it is important that Policy SCLP10.1 takes a balanced criteria-based approach against which development proposals will be judged. Any such policy wording must be proportionate and linked to the Council’s evidence base. Any policy relating to biodiversity should recognise the need to minimise impacts and seek to achieve net gains, but also recognise that any harm will need to be considered in the wider context of the presumption in favour of sustainable development. They also feel that costs relating to the Recreational Avoidance and Mitigation Strategy should be built into the accompanying evidence relating to viability.

#### Members of the Public

District Councillors

Cllr Block suggests that paragraph 10.1 as an introductory chapter is very limited and does not mention the AONB, the importance of nationally and internationally designated sites or important flora and fauna. It is also suggested to include the term ‘conserve’ in paragraph 10.2 instead of

‘protect’ in consistency with other environmental plans. The later part of paragraph 10.2 does not convey the value afforded to the rich diversity of a special landscape and is not appropriately balanced against the economic benefits.

Support

None received

Object

None received.

Observation:

The chapter is at odds with proposals for Felixstowe and Trimley.

**How these comments have been taken into account in the Final Draft Local Plan:**

A new policy has been added to the plan that deals with soils – SCLP10.3 Environmental Quality.

Supporting text amended to better reflect wording in the National Planning Policy Framework.

Policy SCLP10.1 is based on government guidance and is largely carried forward from the current Local Plan. In this respect, the policy is considered to be proportionate. Section 3 details obligations regarding presumption in favour of sustainable development. The Whole Plan Viability Assessment has taken account of costs relating to the Recreational Avoidance and Mitigation Strategy.

Paragraph 10.1 amended to provide more detail about the biodiversity and geodiversity of the District. The Council is of the view that the wording used in paragraph 10.2 is in line with national guidance.

Proposals in Felixstowe and Trimley will be required to accord with the policies in this chapter subject to the presumption in favour of sustainable development outlined in Section 3.

## Biodiversity & Geodiversity

Total comments	Support	Object	Observation
4	0	1	3

### Statutory Consultees

The Marine Management Organisation recommend that the Local Plan applies its own interpretation of the East Marine Plan policies. They refer to their published East Marine Plan which contains policies stating that:

- 1) appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial);
- 2) where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests;
- 3) cumulative impacts affecting the ecosystem of the East Marine Plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation;
- 4) any impacts on the overall Marine Protected Area (MPA) network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network.

Environment Agency – Overall agree with policy SCLP10.1. It is important to note that the protection and enhancement of freshwater and marine water environments is of equal importance.

### Parish and Town Councils

Tunstall Parish Council – Would be useful to include a map of the sites in table 10.1.

Kelsale-cum-Carlton Parish Council – Paras 10.3-10.15 noted. The Parish is producing its own Biodiversity Action Plan.

Kelsale-cum-Carlton – Paragraphs 10.16-10.21 and Policy SCLP10.2 are noted.

### Other organisations

RSPB – Paragraph 10.2 should refer to ‘protect and enhance’ for consistency with NPPF paragraph 170.

The RSPB welcome the recognition in paragraph 10.8 that some brownfield sites have high biodiversity value, while supporting development on brownfield sites of lower biodiversity value.

References in paragraph 10.12 should be to the most recent legislation, which is the Conservation of Habitats and Species Regulations (2017).

The RSPB also support the reference in paragraph 10.13 that provision should be made for nature conservation interests where present, such as nest boxes for swifts.

The RSPB comment that paragraph 10.19 should include explanation of the 13km zone described in the Habitats Regulations Assessment Screening Report. The RSPB also suggest that reference to the Recreational Avoidance and Mitigation Strategy should be included under SCLP10.2.

GeoSuffolk state that paragraph 10.6 should refer to County Geodiversity Sites, not RIGS.

GeoSuffolk also comment that paragraph 10.11 should state that GeoSuffolk can also provide information regarding sites of geological importance.

The Woodland Trust object as there is no reference to the need to protect ancient woodland and ancient or veteran trees, as per paragraph 175 of the NPPF. It should reflect that irreplaceable habitats cannot be replaced elsewhere. They comment that there should be reference to the benefits that trees and woodlands provide including CO2 sequestration, flood alleviation, shading, removal of pollution, habitat and health. Trees and woods should be included in new development wherever possible and funded through developer contributions. It is suggested that the Woodland Trust publication 'Residential Development and Trees' is referred to. The Access to Woodland Standard has been adopted by some other authorities and information on how the Council currently performs can be provided. See also 'Space for People' report.

### **Developers/Landowners**

Policy is supported. It is important that the policy recognises the benefits of biodiversity for new communities. The policy is considered to be in accordance with paragraph 170 of the NPPF.

Gladman Developments Ltd comment that it is important that policies take a balanced, criteria based approach that sets out how development proposals will be judged against the requirements set out in Section 15 of the NPPF 2018. Any such policy wording must be proportionate and linked to the Council's evidence base.

Gladman Developments Ltd comment that any policy relating to biodiversity should recognise the need to minimise impacts and seek to achieve net gains, but also recognise that any harm will need to be considered in the wider context of the presumption in favour of sustainable development.

Gladman Developments Ltd comment that costs associated with a 'Recreational Avoidance and Mitigation Strategy' linked to potential adverse impacts on Special Protections Areas and Special Areas for Conservation should be considered through viability assessment.

### **Members of the Public**

District Councillors

Cllr Block stated in her response that paragraph 10.9 does not reference the value of open systems in relation to Sustainable Drainage Systems. She also requested further clarity as to how cumulative impact is assessed in relation to paragraph 10.10. The example of swifts in paragraph 10.13 should be added to, to include bats, badgers, water voles and ground nesting birds. It is difficult to assess the value of this policy without seeing the Recreational Avoidance and Mitigation Strategy.

Support:

Development should not result in the loss or degradation of semi-natural habitat.

**Object:**

No amount of compensatory habitat will replace the natural environment.

Note that comments have been submitted in respect of this section in relation to concern over impact on wildlife in relation to the proposed allocations at Innocence Farm (SCLP12.30), North Felixstowe Garden Neighbourhood (SCLP12.3) and South Saxmundham Garden Neighbourhood (SCLP12.26), from respondents who have also commented against the proposed site allocations.

**Observation:**

Farmland birds have declined significantly in recent years. The policy should include a provision for mitigation against the loss of any farmland bird habitats. It does not include sufficient protection for habitats that are not priority habitats.

The Recreational Avoidance and Mitigation Strategy is not yet available and so it cannot yet be determined whether any policy to protect European designated sites will work. Consultation is required/requested on the Recreational Avoidance and Mitigation Strategy. The tariff should be applied to single or small groups of houses.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Council feels that the biodiversity policies in the East Marine Plan are accurately reflected in this section.

Supporting text amended to provide equal levels of protection to freshwater and marine environments, to better reflect wording in the National Planning Policy Framework, to highlight the most recent legislation relating to the conservation of habitats and species and to reword terminology relating to County Wildlife Sites and sites of geological importance.

It is not considered appropriate at this point to map the nature conservation sites in Table 10.1 as the Suffolk Biodiversity Information Service is considering a mapping exercise that could involve such nature conservation sites on a Suffolk wide basis.

Supporting text amended to include reference to the protection and importance of ancient woodland and ancient or veteran trees. The benefits of trees and woodland are reflected in paragraph 10.2 in the context of the wider natural environment. Policy SCLP10.1 encourages the inclusion of trees and woods in new developments as part of wider habitat and green infrastructure improvements.

Policy SCLP10.1 is based on government guidance and is largely carried forward from the current Local Plan. In this respect, the policy is considered to be proportionate. Section 3 details obligations regarding presumption in favour of sustainable development. The Whole Plan Viability Assessment has taken account of costs relating to the Recreational Avoidance and Mitigation Strategy. Policy wording amended to include the provision of biodiversity net gain.

It is considered that paragraph 10.9 appropriately references the value of open systems in relation to Sustainable Drainage Systems in the wider context of green infrastructure. The cumulative impact stated in paragraph 10.11 will be assessed on a case-by-case basis subject to advice provided by Natural England and the Marine Management Organisation. Supporting text amended to expand on examples of priority species benefits.

Policy SCLP10.1 provides sufficient protection to protected and priority species and habitats. There is no evidence to suggest that protection of non-priority habitats is required. National guidance does not require policy to provide such protection.

The Habitat Regulations Assessment has concluded that the policies in this Local Plan are workable based on discussions between the Council and Natural England regarding the likely content of the Recreational Avoidance and Mitigation Strategy.

National guidance does not provide a level of protection to semi-natural habitat and there is no evidence that alludes to the importance of protecting such habitat.

Proposals for development will be required to accord with the policies in this chapter subject to the presumption in favour of sustainable development outlined in Section 3.

## Conserving and Enhancing our Natural Areas

Total comments	Support	Object	Observation
18	5	2	11

### Statutory Consultees

The Suffolk Wildlife Trust stated the following:

- The regulations referred to in paragraph 10.6 should be 2017 not 2012.
- They support the policy wording relating to the creation and enhancement of green corridors and biodiversity networks.
- They highlight that the Suffolk Biodiversity Information Service holds information relating to the mapping of ecological networks as required by the National Planning Policy Framework and that this could be supplemented by further assessment. They request the inclusion of this mapping in accordance with the National Planning Policy Framework and to improve the robustness of this chapter.
- They note that Priority Habitats and Species and protected sites and species should be referenced in paragraph 10.11.
- Regulations referenced at paragraph 10.12 should be 2017 not 2010.

In a separate response they suggest a number of amendments to Policy SCLP10.1 and the inclusion of ecological network mapping in line with the National Planning Policy Framework. They also note that the Habitats Regulations Assessment of the Plan recommends for this policy to be revisited after the Appropriate Assessment is completed; they request that this is undertaken and that any amendments required as a result of this are implemented.

Natural England stated the following:

- Their support for the need to positively contribute towards biodiversity through the creation of networks, linkages and new green infrastructure.
- They highlighted that a benefit of this in new developments is that it diverts activity away from protected areas when undertaking routine recreational activities.
- They suggest a number of additions that could bolster this requirement by providing for the needs of routine recreational activities.
- They would like to see the inclusion of sustainable development achieving net gains for nature in addition to providing adequate mitigation/compensation for any losses. This is a requirement under National Planning Policy Framework.
- They recommend the policy or supporting text references the mitigation hierarchy i.e. if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss. Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable

habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland.

- They recommend that the policy sets out that any proposal that adversely affects a European site, or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission. This is required to ensure consistency with national planning policy.
- They also suggest some minor wording to the Recreational Avoidance and Mitigation Strategy element of the policy.
- They would like to have further discussion about GI, SANGS, Net Gain and the Appropriate Assessment.

### **Parish and Town Councils**

Kelsale-cum-Carlton Parish Council – Note paras 10.16-10.21, and policy SCLP10.2.

Bawdsey Parish Council state that the Recreational Avoidance and Mitigation Strategy document will be crucially important.

### **Other organisations**

Ipswich Borough Council support the reference to green corridors in the plan and expressly mention the need to consider their Green Corridors Plan as it includes corridors that extend up to SCDC.

### **Developers/Landowners**

Gladman Developments Ltd state that it is important that Policy SCLP10.1 takes a balanced criteria-based approach against which development proposals will be judged. Any such policy wording must be proportionate and linked to the Council's evidence base. Any policy relating to biodiversity should recognise the need to minimise impacts and seek to achieve net gains, but also recognise that any harm will need to be considered in the wider context of the presumption in favour of sustainable development. They also feel that costs relating to the Recreational Avoidance and Mitigation Strategy should be built into the accompanying evidence relating to viability.

### **Members of the Public**

District Councillors

Cllr Christine Block suggested a minor amendment to Policy SCLP10.1.

Support

None received

Object:

None received

Observation:

Should include provision for mitigation against the loss of any farmland bird habitats which have declined massively in recent decades and continue to do so. The policy does not include sufficient

protection for such habitats which are not priority habits (e.g the cropped area of a field) and any farmland birds may not occur in sufficient numbers within any one particular development proposal to be considered significantly affected. Consultation on the Recreational Avoidance and Mitigation Strategy is requested.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text amended to reflect the most up to date version of legislation and to appropriately reference priority habitats and species.

Policy amended to include reference to UK or Suffolk Priority Species and to require significant ecological enhancements. It is not considered appropriate at this point to map the nature conservation sites in Table 10.1 as the Suffolk Biodiversity Information Service is considering a mapping exercise that could involve such nature conservation sites on a Suffolk wide basis.

Supplementary text amended to provide for the needs of routine recreational activities as part of ecological corridors or networks within new developments, to take account of plans in neighbouring authorities where ecological corridors cross boundaries and to appropriately reference the mitigation hierarchy.

Policy amended to include reference to biodiversity net gain, the adverse effects of proposals on European Sites and Sites of Special Scientific Interest and to make minor changes to the final paragraph of the policy in reference to the Recreation Avoidance and Mitigation Strategy. The Council has been in discussions with Natural England.

Policy SCLP10.1 is based on government guidance and is largely carried forward from the current Local Plan. In this respect, the policy is considered to be proportionate. Section 3 details obligations regarding presumption in favour of sustainable development. The Whole Plan Viability Assessment has taken account of costs relating to the Recreational Avoidance and Mitigation Strategy.

Minor amendment to policy wording to require compensatory habitat to be of equal ecological value to the habitat lost as a result of development.

Policy SCLP10.1 provides sufficient protection to protected and priority species and habitats. There is no evidence to suggest that protection of non-priority habitats is required. National guidance does not require policy to provide such protection.

## Policy SCLP10.2 Visitor Management of European Sites

Total comments	Support	Object	Observation
4	1	0	3

### Statutory Consultees

Suffolk Wildlife Trust support the intention of this policy. They note that the Habitats Regulations Assessment recommends that the policy is revisited following the Appropriate Assessment and that any amendments to the policy required as a result of the assessment are implemented.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paras 10.16 – 10.21 and SCLP10.2 are noted.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Support:

Support the 1km rule, but this should be 1 mile as people may become more active over the lifetime of the plan. Questions whether recreation is so harmful in protected areas. On the River Deben it is good that the public rights of way on the river wall is breached as this provides a sanctuary for birds.

Object

None received.

Observation

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Limited number of comments received to this section. Those received were generally supportive of the Council's approach to Visitor Management of European Sites.

## Policy SCLP10.3 Landscape Character

Total comments	Support	Object	Observation
41	5	14	22

### Statutory Consultees

Marine Management Organisation (MMO) - The Marine Management Organisation recommend that the Local Plan applies its own interpretation of the East Marine Plan policies.

Natural England - Advise that the following sentence should be amended as follows:

“Development will not be permitted where it will have a significant adverse impact on the landscape and scenic beauty of protected landscapes and the setting of the designated areas of the Broads or the Suffolk Coast and Heaths Area of Outstanding Natural Beauty”. The policy and/or accompanying text should refer to The Suffolk Coast and Heaths AONB Management Plan objectives, encourage the enhancement of landscape and scenic beauty within the AONB, and should set out clear criteria for appropriate development within or impacting it.

Suffolk Heritage Coast is not mentioned in the policy or accompanying text. Heritage Coasts are defined and managed to conserve their natural beauty and public enjoyment; the plan should identify and include policies for the Heritage Coast. Welcome the references to the protection of locally valued landscapes and dark skies.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paras 10.22 – 10.36 and SCLP10.3 are noted.

Wickham Market Parish Council – It is concerning that no Settlement Sensitivity Analysis has been undertaken for Wickham Market which will see development of 220 new homes. The proposed allocation SCLP12.56 should be subject to sensitivity analysis. Consultation in Wickham Market has supported retention of SLAs. Removal of SLAs will leave river valleys and hinterlands vulnerable to development. The wording of SCLP10.3 is too broad. Applications should be accompanied by landscape appraisals / visual impact assessments. The LCA is no substitute for site specific assessment. Paragraph 2 should state ‘...will protect, *provide suitable landscape mitigation* and enhance...’. There should be a comma after woodland under criterion (c).

Sudbourne Parish Council – Welcome the first sentence ‘Proposals for development...’ Hope the preservation of tranquillity of AONB and Heritage Coast will be carried through into decisions. Public benefit of landscapes should be recognised in decisions.

Sudbourne Parish Council - Welcome the first statement in SCLP10.3 – ‘..Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence...’ Anxious to ensure that the public benefit of the ‘...rural river valleys, historic park and gardens, coastal, estuary, heathland, AONB and other very

sensitive landscapes...’ will be recognised in future decisions of the planning authority. Seek to establish a local landscape character assessment should the parish undertake a Neighbourhood Plan.

Parham Parish Council - regret the loss of Special Landscape Areas and would like this noted.

Friston Parish Council suggest the AONB is expanded to protect the rural countryside villages and settlements. The Parish Council note that paragraphs 10.13 and 10.14 state that it is important to protect habitats outside designated areas.

Hacheston Parish Council object on the basis on the loss of the Special Landscape Area. The criteria can be vague and subjective and is dependent on interpretation. The policy as set out allows for any green infrastructure despite its impact on the landscape, unless it has a significant adverse impact. Residents are concerned there will be no protection.

Wickham Market Parish Council - Possible conflict between this and the above policy 11.8. One supporting new development within gardens and the other aiming to protect garden and other spaces. Clarity and links between the policies should be developed to ensure that both are consistently shown to be aiming to protect important green spaces, and natural landscape features including trees. Noting trees, there is a distinct lack of policy relating to the need to protect, enhance and encourage new planting within settlements and surrounding rural landscape.

Aldeburgh Town Council - Essential greater protection should be given to preserving trees throughout the town.

Marlesford Parish Council - Together with Hacheston Parish Council, are concerned that Policy SCLP10.3 makes no mention of Special Landscape Areas and it seems clear that this designation will be abandoned. Despite assurances to the contrary, this will result in a relaxing of controls over development in the Ore and Deben valleys. Would like the policy to state that, in these areas, “no development will be permitted without full consideration of the impact on the landscape”.

### **Councillors**

Councillor Christine Block – Paragraph 10.27 The Plan states that AONB landscape designations are given ‘the highest protection for their landscape and scenic beauty’ - The weight / importance given to the AONB by this statement is not reflected in other sections of the Plan which include the AONB area. This is potentially confusing and contradictory. Welcome inclusion in the Plan to ‘protect and enhance the tranquillity and dark skies across the district.’ However, to ensure this is a meaningful policy reference should be made to the need for assessment of the tranquillity of an area prior to any change.

### **Other organisations**

Ramblers Association - Proposed development should take into account footways within it and links to the pre-existing paths, including the definitive map and other routes used regularly. A walk by the Parish Council over the site will usually allow such routes to be included in the development. At the least an equivalent network should be achieved.

Suffolk Preservation Society – The policy gives AONBs the same status as locally sensitive landscapes, contrary to paragraph 171 of the NPPF. The policy should refer to paras 171 and 172 of the NPPF. Great weight should be attached to conserving the landscape and scenic beauty of AONBs. Phrases

such as ‘will be expected’ and ‘where possible’ lack rigour. Developments with a less than significant impact (other than minor development) should also be accompanied by landscape appraisal, landscape and visual impact assessment and landscape mitigation.

Aldeburgh Society - Landscape Quality Protection and Enhancement is supported.

Forestry Commission - Encourage local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through, the inclusion of green infrastructure (including trees and woodland) in and around new development and the use of locally sourced wood in construction and as a sustainable, carbon lean fuel.

### **Developers/Landowners**

Gladman Developments Ltd - In relation to ‘tranquillity and dark skies’ it is important that any such areas are justified through supporting evidence and identified on the accompanying policies map. It should be made clear that policies in Neighbourhood Plans will need to be clearly justified. Highlight that the masterplanning of the Orwell Green site is seeking to ensure that the development proposal sits comfortably within its landscape setting, in relation to the Settlement Sensitivity Assessment and Landscape Character Assessment.

Strutt & Parker for Suffolk County Council – Support the policy which provides for an informed approach to development that is integrated with the landscape.

Richard Brown – Indicative masterplans and LVIA by Pegasus Group identify key landscape change and mitigation on promoted sites.

### **Members of the Public**

Feedback is mainly objections to the removal of Special Landscape Areas (SLAs) in favour of Landscape Character Assessment. Lack of reassurance that any greater level of protection will be provided for the quite beauty of the Suffolk countryside.

Strengthen phrases like ‘will be expected’, ‘where possible’ and ‘should’. The policy should state that “no development will be permitted unless the landscape is unharmed or suffers minimal harm”, or “the character of the landscape is unharmed”.

Concern that development with less than a significant adverse impact will be allowed and that developer may simply state that the development is necessary and can be mitigated.

A significant adverse impact is a very high degree of harm on the spectrum of landscape harm.

Most developments will be in the area of less than a significant adverse impact and these applications for development need to be accompanied by comprehensive landscape appraisals, assessments, LVIAs and landscape mitigation schemes.

The policy should state that ‘development will be refused where it fails to demonstrate that there is no damage to the landscape character and quality of an area or where the location, scale, form and design is inappropriate in terms of the landscape character’.

Need to clearly set out how the balancing exercise between the harm a proposed development will cause and any public benefit it delivers will be undertaken.

The Landscape Character Assessment undertaken by Alison Farmer Associates in July 2018 appears to be very broad brush and SCDC should do more work to understand the special qualities and distinctive features of the whole landscape.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy amended in relation to distinguishing the importance of protecting the AONB as recommended by Natural England. The Heritage Coast in Suffolk Coastal is entirely within the Suffolk Coast and Heaths AONB so it is covered by landscape policies relating to the AONB. Policies in the Tourism Section reflect other objectives of the Heritage Coast status.

The Special Landscape Areas are based on historic and obsolete County Council Structure Plan evidence. Categorical protection policy delineation for such areas would not be supported by up to date evidence or Government Planning Policy Guidance. Landscape Character areas identify the combinations of landscape types and characteristics that exist in every part of the District. Whereas the Special Landscape Areas singled out particular concentrations of river valley, heathland, broadleaved woodland landscape for protection.

The policy is sufficiently positive as to not completely inhibit development within character areas, but also provides sufficient protection to ensure that the characteristics of these areas are preserved and opportunities for their enhancement realised.

The Landscape Character policy approach provides robust protection of sensitive landscape characteristics to development through a landscape character approach that is inextricably linked to up to date Landscape Character evidence. Landscape character is the distinct, recognisable and consistent pattern of elements that makes one landscape different from another. Landscape Character policy recognises that all landscapes matter, not just those that are designated.

The Landscape Character policy approach enables scrutiny and protection of landscape from development proposals nearby that impact their setting. It also enables opportunities for enhancement to be given scrutiny and realised by virtue of it being linked to and being informed by comprehensive up to date landscape evidence. This includes as an example the most effective and sustainable type of species planting.

## Policy SCLP10.4 Settlement Coalescence

Total comments	Support	Object	Observation
11	3	3	5

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paras 10.37-10.38 and SCLP10.4 are noted.

Wickham Market Parish Council - This new policy is fully supported. As stated for Policy 10.3 proposals may need to be accompanied by suitable landscape appraisal work where an exception to the policy is being promoted.

Sudbourne Parish Council support policy SCLP10.4. They comment that there is a risk that cluster developments under SCLP5.4 may lead to settlement coalescence. Sudbourne’s character relates to the lack of ‘continuous lines’ and ‘close groups’ of dwellings. They comment that they may wish to develop a more locally sensitive statement should they proceed to a Neighbourhood Plan.

Westerfield Parish Council comment that they would like to have more open space to create a corridor for wildlife biodiversity between the east of the village and the proposed country park and to prevent unwanted coalescence.

### Other organisations

None received

### Developers/Landowners

Ipswich Town Football Club comment that it is important that the policy is not too restrictive. The policy should relate to the careful management of spaces, not apply a restrictive blanket approach.

Hopkins Homes object on the basis that the policy as currently worded could be interpreted as preventing all development within the countryside which is not located on an allocated site. Reduction in openness may not necessarily result in material harm. The policy could be used to prevent otherwise sustainable development in the open countryside between settlements, despite such development potentially not having a material harm in terms of settlement coalescence. Policy SCLP10.4 is not considered to be justified and should be deleted.

Woolpit Business Parks comment that it is important that this policy is not so overly restrictive. It is considered there are opportunities for development on land between settlements that would not lead to the coalescence of settlements.

Gladman Developments Ltd comment that the policy should be based on robust evidence. The policy wording should be drafted in a criteria based manner that enables case-by-case judgements to be made on the impact of proposed developments in relation to issues of coalescence. It must be

recognised that new development can often be located in areas between settlements without leading to them physically or visually merging. The policy should recognise that where harm arises, this should be mitigated where possible and assessed against the wider sustainability benefits of a development proposal in line with the presumption in favour of sustainable development.

### **Members of the Public**

#### Support:

Support the Policy of identifying and protecting the identity and character of separate settlements particularly in relation to Benhall Green and Saxmundham.

#### Object:

This is contrary to development proposed between Walton and Trimley St Mary and between Trimley St Mary and Trimley St Martin, and at North Felixstowe.

#### Observation:

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy states that development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements. The policy will operate in conjunction with other Final Draft Local Plan policies and monitoring of the implementation of the Local Plan strategy for housing and employment growth.

## 11 Built Environment

### General comments

Total comments	Support	Object	Observation
2	0	0	2

#### Statutory Consultees

Historic England suggest that paragraph 11.1 should be amended to include built and historic environment. It is also commented that paragraphs 11.2 and 11.3 contain an element of repetition.

#### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – paragraphs 11.1 and 11.2 are noted.

#### Other organisations

None received

#### Developers/Landowners

None received

#### Members of the Public

None received

#### How these comments have been taken into account in the Final Draft Local Plan:

Historic Environment comments have been taken on board, resulting in the chapter being titled Built and Historic Environment and re-wording of paragraphs 11.2 and 11.3 to remove the elements of repetition.

## Policy SCLP11.1 Design Quality

Total comments	Support	Object	Observation
24	6	4	14

### Statutory Consultees

Historic England – state the policy would be stronger if the key elements of local distinctiveness and character were set out in the policy or in the strategies for the major centres and market towns. They also express a desire for the inclusion of ‘historic’ in criteria b), in relation to the built and natural environment. They raised a minor point that paragraphs 11.2 and 11.3 have an element of repetition.

Suffolk County Council – welcomes the identification of dementia friendly design. The County believe more could be done to emphasise active travel, and suggest text could be included in criterion h). They also suggest detailing the need to encourage the feeling of openness, in regards to criterion c). Additionally, criterion f) is mentioned with potential to include reference to development of publically accessible locations that are overlooked in order to deter crime and enhance feelings of safety. They also support the policy approach to inclusive and dementia friendly design. The County Council, on behalf of Suffolk Fire & Rescue Services, envisage that additional service provision will not be required. However, as noted this will be reconsidered if service conditions change. The County support criterion j) in encouraging sustainable waster management.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – note and welcome paragraphs 11.6, 11.12 and 11.13 in terms of references to designs catering for all ages and abilities, and 11.15.

Sudbourne Parish Council – Strongly supports this policy, and would welcome support and facilitation to input into the update of the Suffolk Design Guide. Support the Suffolk Design Review Panel.

Felixstowe Town Council – State the design policy should encourage creativity and diversity of design proposals. The Town Council also suggested the District Council should match ‘quality developers’ with development projects. Furthermore, they encouraged the use of a design brief that any development on a particular site would have to comply with, with the premise being to ensure high quality design and deter placeless developments.

Framlingham Town Council – Supports the policy and suggested great emphasis be placed on enforcement of planning conditions to ensure high quality approved design is built.

Bawdsey Parish Council – Support the policy but would like to see the addition of positive emphasis towards energy efficiency.

Hacheston Parish Council – Support the approach taken to ensuring all groups in society are sustainably catered for.

## Other organisations

Suffolk Coast and Heaths AONB – The Use of Colour Guide for the Suffolk Coast and Heaths AONB could be a useful tool in decision making and should be referenced in the supporting text in paragraph 11.7 and included in the Local Plan evidence base.

Suffolk Preservation Society – The policy should include encouragement for engagement between developers and the Suffolk Design Review Panel, where appropriate.

Woodbridge Society – Observe that the need for good design is integral to sustainable development and that what constitutes good design can vary depending on a number of factors, the context of each development a key consideration.

Aldeburgh Society – Support the policy with particular encouragement regarding the use of Design Panels, the link to the emerging Suffolk Design Guide, and the use of Quality of Place Awards.

## Developers/Landowners

Strutt & Parker LLP on behalf of Suffolk Coastal District Council – supports the policy and emphasis the importance of ensuring high quality design and the benefits of master planning in providing a holistic and comprehensive approach to development.

## Members of the Public

The limited public commentary has been positive on the whole, with particular support for the innovative and creative approach. An observational comment related to the need for more car parking and an objection referred to a belief that design should be in-keeping with the existing built environment with the exclusion of modern architectural styles.

### Support:

Comment of support states that the policy should ensure that developers don't use standard designs. Design should be more innovative and enhance a settlement.

### Objection:

One member of the public has objected to the policy, with the view that development should be in-keeping with the existing built environment with the exclusion of modern architectural styles.

Doors should be painted different colours.

More houses results in more cars so speeds should be reduced.

### Observation:

A member of the public stated that sufficient parking space should be provided including through sufficient road widths and off street parking. Garages tend to be used for storage, and hence not used for car parking.

Support for innovative and forward thinking design with a focus on eco friendly initiatives.

**How these comments have been taken into account in the Final Draft Local Plan:**

Elements of repetition and reference to Historic in relation to built and natural environments have been addressed in response to Historic England representation. Reference has also been made to an inexhaustive list of key documents that should be used in order to understand local character in specific locations. It is considered local character is best understood at settlement and site specific scales and so any delineation of local character in the local plan at the district scale will not foster an attitude of engaging with settlement/site specific local character.

In response to Suffolk County Council's comments, the policy has been amended with regard to encouraging sustainable modes of travel and supporting design that is well lit and reduces the opportunities for crime through the concept of an active and overlooked public realm.

In response to comments from Bawsdey Parish Council, reference has been made to supporting measures that increase energy and resource efficiency.

## Policy SCLP11.2 Residential Amenity

Total comments	Support	Object	Observation
6	2	1	3

### Statutory Consultees

Summary of comments received from statutory consultees – include name of the organisation

Suffolk County Council – suggest the inclusion of acknowledgement of the impact of the loss of residential amenity on health and well being, with particular reference given to the most vulnerable people of society such as children and elderly. The County Council also raise refer to noise, odour and dust, and that they impact on the health and wellbeing of those affected.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Note paragraph 11.7 (11.17?) and SCLP11.2

Felixstowe Town Council – Supports this policy.

Little Bealings Parish Council comment that there are issues around the noise at Sinks Pit and traffic along Martlesham and Playford Roads which has continued to increase in volume and speed since the introduction of the 30mph limit on the A1214 Kesgrave Road and the building of Grange Farm.

### Other organisations

Aldeburgh Society – welcome the guidance included within the policy.

### Developers/Landowners

Artisan PPS – ‘Outlook’ should not be included as it could be interpreted as loss of view.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan has been revised with minor changes made in response to consultation response and internal comments.

## Policy SCLP11.3 Historic Environment

Total comments	Support	Object	Observation
10	2	3	5

### Statutory Consultees

Historic England – welcome the commitment in paragraph 11.22 to encourage Neighbourhood Plans to consider identifying and protecting Non-Designated Heritage Assets. Historic England also support the approach to sustainable construction in paragraph 11.24 where this will not negatively impact on the significance as demonstrated in Policy SCLP9.2. Historic England also suggest that the supporting text would benefit from more specific references to the District’s historic environment.

Historic England objected to policy SCLP11.3 and suggest it could be improved by incorporating some requirements currently in the supporting text, such as the requirement for heritage impact assessments, into the policy.

The Marine Management Organisation referred to their published East Marine Plan policies which states that proposals should demonstrate in order of preference:

- 1) that they will not compromise or harm elements which contribute to the significance of the heritage asset;
- 2) how, if there is compromise or harm to a heritage asset, this will be minimised;
- 3) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against; and
- 4) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate harm to the heritage asset, and state that the Local Plan should include its own interpretation of these.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 11.18 – 11.28 and Policy SCLP11.3 are noted.

Felixstowe Town Council – Supports this policy.

### Other organisations

Suffolk Preservation Society - SCLP11.3 lacks detail and rigour. It fails the NPPF requirement to set out a positive strategy. ‘To conserve and enhance the historic environment’ should not be used twice in the same sentence. A positive strategy should identify opportunities including for positive contributions or to better reveal the significance of assets. Consideration should be given to the impact of other policies. It should include heritage assets at risk. It should take account of putting assets to use, wider benefits, positive contribution from new development and drawing on the contribution to the character of a place.

The Woodbridge Society – has referenced the importance of the historic environment to Woodbridge.

### **Developers/Landowners**

Artisan PPS Ltd outline that SCLP11.3 should reflect Section 16 of the NPPF and include reference to putting assets to their most viable use.

Gladman Developments Ltd – Support the conservation and enhancement of the historic environment. However, raise concerns regarding the policy approach to enable heritage assets to be designated within Neighbourhood Plans. Reference is made to the need for such designations to be supported by robust evidence based on a clear understanding of an asset’s evidential, historical, aesthetic, or communal value.

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

This policy has been considerably edited to provide a robust and detailed policy, in response to Historic England, Suffolk Preservation Society and internal comments.

## Policy SCLP11.4 Non-Designated Heritage Assets

Total comments	Support	Object	Observation
7	1	2	4

### Statutory Consultees

Historic England – recommend that reference to non-designated archaeological assets of demonstrably equivalent significance to scheduled monuments (as per paragraph 194 / footnote 63 of the NPPF) should be incorporated into Policy SCLP11.4 or SCLP11.6. Historic England also state that regarding paragraph 11.31, and in objection to policy SCLP11.4, there needs to be clarity as to whether the criteria apply to all Non Designated Heritage Assets or just to buildings and structures. They recommend that the relationship between this section and the non-designated historic parks and gardens should also be made clear.

Suffolk County Council – suggest it is not clear whether the policy is the trigger for decision making processes at the point of determining planning applications, or if it is a trigger for seeking further information in support of an application. The County suggest it should be the former, the policy should be setting out how development affecting a Non Designated Heritage Asset should be considered and will be determined.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 11.29 – 11.32 and Policy SCLP11.4 are noted.

### Other organisations

The Woodbridge Society – Supports the policy but state it should be actively used, with particular reference to the Melton Hill site.

Westover Landscape Ltd – have objected on the basis that there is no description of what a Non Designated Heritage Asset can be. SCLP11.4 should include reference to securing the retention and enhancement of Non-Designated Heritage Assets.

Aldeburgh Society – Support the policy.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Wording has been added to further explain Non-Designated Heritage Assets and reference made to the National Planning Policy Framework in assessing impact on Non-Designated Heritage Assets, in

response to Historic England and Westover Landscape Ltd.

## Policy SCLP11.5 Conservation Areas

Total comments	Support	Object	Observation
10	2	4	4

### Statutory Consultees

Historic England state that the opening sentence to paragraph 11.34 requires further explanation in terms of its context. Historic England also state that they welcome the statement in policy SCLP11.5 that development within Conservation Areas will be assessed against conservation area appraisals and management plans, however they raise an objection to the policy in recommending that bullet point (c) is placed first, and that the first two bullet points both have 'or' after them.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 11.33 – 11.34 and Policy SCLP11.5 are noted.

Felixstowe Town Council – Supports this policy.

### Other organisations

Suffolk Preservation Society – policy SCLP11.5 should also apply to setting of a Conservation Area. Sufficient detail should be required to be submitted to assess this.

Westover Landscape Ltd - It is suggested that the importance of trees should be included in the policy and the supporting text and it is stated that trees are often lost due to a reluctance to serve TPOs. It is also suggested that spaces should be designated to protect Conservation Areas. Article 4 Directions should not be ruled out within Conservation Areas.

Woodbridge Society – State support for an expansion to the Woodbridge Conservation Area.

Aldeburgh Society – Support the policy.

### Developers/Landowners

None received

### Members of the Public

The limited number of comments from members of the public focused on the need for development to take appropriate account of relevant Conservation Areas.

Object:

It is suggested that development in Conservation Areas should be consistent with the relevant Conservation Area Appraisal.

It should be noted that a comment has been submitted under this policy in relation to the proposed allocation under Policy SCLP12.40, Brandeston, in that this will impact on the setting of Brandeston Conservation Area, by a respondent who has also logged the comment against Policy SCLP12.40.

Observation:

Much of Peasehall is bounded within a Conservation Area, which should be retained.

**How these comments have been taken into account in the Final Draft Local Plan:**

This policy has been considerably edited to take account of consultation representations and internal comments.

## Policy SCLP11.6 Archaeology

Total comments	Support	Object	Observation
6	1	1	4

### Statutory Consultees

Historic England – comment that Suffolk County Council should also be involved in relation to identifying, protecting and relocating archaeology under paragraph 11.38.

Suffolk County Council – Suggest amplification of the historic environment could be made by creating it as a distinct chapter headed ‘Historic Environment’ as opposed to the current heading of ‘The Built Environment’, as is the case with the ‘Natural Environment’. The County also state the wording of ‘full’ should be removed from ‘a full archaeological assessment’, and be changed to ‘Archaeological assessment proportionate to the potential and significance of remains must be included..’. Further wording should be added to the policy, ‘Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported.’

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 11.35 – 11.40 and Policy SCLP11.6 are noted.

Felixstowe Parish Council – Supports this policy.

### Other organisations

None received

### Developers/Landowners

There must be reasonable evidence that a full archaeological assessment is necessary for this to be required.

### Members of the Public

None received.

### How these comments have been taken into account in the Final Draft Local Plan:

Amendments suggested by Suffolk County Council and Historic England have been incorporated into the policy.

## Policy SCLP11.7 Parks and Gardens of Historic or Landscape Interest

Total comments	Support	Object	Observation
9	3	2	4

### Statutory Consultees

Historic England comment that Felixstowe Town Hall Gardens and Woodbridge Cemetery are also identified as parks and gardens of historic interest on the Council's website (in SPG6), and raise an objection to policy SCLP11.7 due to them not being referenced. Historic England also state that it would be useful to set out the criteria used for identifying parks and gardens, and the specific reasons (if it is not a mistake) as to why the Felixstowe Town Hall Gardens has not been included in Policy SCLP11.7.

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraph 11.4 and SCLP11.7 are noted.

Felixstowe Town Council – Supports this policy, with particular interest in the historic seafront gardens.

### Other organisations

Westover Landscape Ltd - There should be a requirement for proposals affecting or within the designated or non-designated landscapes to be accompanied by landscape design and management proposals to ensure that a high level of design, mitigation and enhancement is achieved. Through the planning process new historic parks and gardens should be identified. The Felixstowe gardens are on the Historic England list of Registered Parks and Gardens, and should be referred to in policy SCLP11.7.

### Developers/Landowners

None received

### Members of the Public

Comments focussed on the need to protect both nationally registered and locally listed parks and gardens from development, with particular regard to gradual encroachment of development and negative impact this can have on the significance of the assets.

Support:

It is vitally important to protect parkland areas. Important they remain intact and not encroached on.

No development should be allowed on Parks and Gardens for any reason.

Support for protection of Carlton Park, Saxmundham. It provides a transition from the urban area to rural area.

**How these comments have been taken into account in the Final Draft Local Plan:**

The list of nationally registered and locally listed parks and gardens has been updated in accordance with Historic England and Westover Landscape Ltd representations and internal comments.

Reference has been made to keeping the local list of parks of gardens under review and that new designations will be made where appropriate, as recommended by Westover Landscape Ltd and internal comments.

## Policy SCLP11.8 Areas to be Protected from Development

Total comments	Support	Object	Observation
28	6	8	14

### Statutory Consultees

Historic England – supports the policy as an important way to protect important spaces between settlements. Historic England notes that they have not reviewed all the allocated Areas to be Protected from Development in the Local Plan.

### Parish and Town Councils

Ufford Parish Council – Welcome the retention of the policy as this helps to preserve the character of many villages.

Kelsale-cum-Carlton Parish Council – Paragraphs 11.42 and 11.43 and Policy SCLP11.8 are noted.

Wickham Market Parish Council – Supports the inclusion of the ‘severely restricted’ in the policy. It is not clear why no new spaces have been added in Wickham Market since 2001. The supporting text should mention attractive landscape features including mature hedges and trees. They state that they hope to designate new spaces in their Neighbourhood Plan. The Parish Council also believe there is an inherent conflict between policies SCLP5.7 (Infill and Garden Development) and SCLP11.8, in supporting infill and garden development and protecting valuable spaces in and between developments and settlements.

Felixstowe Town Council – Supports the policy and expressed delight at the retention of Areas to be Protected from Development that prevent coalescence between Felixstowe and its neighbouring villages.

Rendham Parish Council – made reference to the two village greens in Rendham and emphasised their desire to see the village greens designated as Areas to be Protected from Development.

Little Bealings Parish Council – suggest land has been removed from the APD designation and Special Landscape Areas, with a request for the land to be re-instated as an APD.

### Other organisations

The Woodbridge Society – Supports the policy, and state Kingston Field should be designated an Area to be Protected from Development.

Westover Landscape Ltd - The policy should state that development will be ‘*refused or severely restricted*’. It is commented that the policy conflicts with policy which supports infill and garden development (SCLP5.7), as the impact on trees and the space for trees should be considered.

### Developers/Landowners

Policy is onerous. It is an historic policy and not based on evidence. The NPPF requires plans to be underpinned by relevant and up to date evidence to support and justify policies. Reference is made to paragraph 57 of the Inspector's Report for the Site Allocations and Area Specific Policies DPD which states that such issues should be covered by criteria based policies in a local plan review.

Armstrong Rigg Planning, on behalf of Hopkins Homes Ltd – believe the policy to be too restrictive, more restrictive than is stated in the NPPF (paragraph 170). In this regard, it is suggested the policy should be relaxed to not preclude the delivery of sustainable development. Reference should be given to any harm that might arise to open spaces, gaps, gardens, and other spaces weighed in the balance of the benefits that result from proposed development.

Gladman Developments Ltd – State the need to comprehensively review any such policy that details the inclusion of Areas to be Protected from Development. In the absence of any such robust evidence the policy should be removed from the Plan. With regard to coalescence of settlements, it should be acknowledged that development can be satisfactorily accommodated within gaps without compromising the position as separate settlements and settlement identity.

### **Members of the Public**

Members of the public support the policy as it protects important locations from development that would be inappropriate. Comments also suggest a number of locations that should be allocated as Areas to be Protected from Development.

Kesgrave must seek to create its own settlement identity, through separation between settlements and the protection of countryside between settlements. It is suggested that Kesgrave needs a policy in the same ilk as that of Rushmere St Andrew in relation to the identified level of policy protected open space.

The Council should identify and serve Tree Preservation Orders to protect trees.

It does not seem as though these policies are being implemented. Concern about the impact of development in Felixstowe, Trimley and Walton.

Support for the retention of existing Orford APD.

In addition to comments above, a number of specific areas have been suggested as new Areas to be Protected from Development, as per the comments set out below:

- Two respondents have suggested that land at covered by planning application DC/15/4788/OUT (SHELAA site 452, Land off Duke's Park) should be designated as Local Green Space, open space and an area to be protected from development, due to it being close to the community, demonstrably special and local in character.
- Old Felixstowe.
- Eastward Ho, The Grove to Gulpher Road and Marsh Lane, Felixstowe.
- Ferry Road, Felixstowe.
- The area between the River Deben and the railway line, plus from the railway line to the back of the Ipswich Road properties (Woodbridge). Development here would impact on the

landscape, AONB, tranquillity, tourism businesses and quality of life. It is also possibly at risk of flooding.

- Farmland proposed for development at Innocence Farm under SCLP12.30.
- Land bordered by TopStreet, Ipswich Road, Sandy Lane and Duke's Park, Martlesham.
- Land south of the Street, Brandeston in which the settlement boundary bisects the land owners garden. Request made to incorporate land owners garden in an APD.
- Area identified as KG1 in the Settlement Sensitivity Assessment Volume 1, area to the north of A1214.
- Area identified as KG2: Long Shops Bridleway (Sandlings Walk), Fentons Wood, Area of land by Foxhall Stadium, Area south of Long Stropps between Bell Lane and Dobbs Lane.

It is also suggested that sites which have been refused planning permission be given Area to be Protected from Development status.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy has not been amended as a result of the strong support for the policy in its current form from consultation representations, with particular regard to that of Statutory Consultees, Parish and Town councils and members of the public.

## Policy SCLP11.9 Newbourne - Former Land Settlement Association Holdings

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

Kelsale-cum-Carlton Parish Council – Paragraphs 11.44 – 11.46 and SCLP11.9 are noted.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received.

### How these comments have been taken into account in the Final Draft Local Plan:

The policy has not been amended due to the absence of any suggested consultation amendments.

## 12 Area Specific Strategies

### General Comments / Introductory Paragraphs

Total comments	Support	Object	Observation
5	0	0	5

#### Statutory Consultees

Historic England comment that they welcome in general the approach to have individual portraits for areas and policies to guide development in specific areas. However, when the approach is applied to the rural areas it becomes more generic.

The Environment Agency comment that further to site specific comments Aldeburgh, Framlingham and Tuddenham (Ipswich) Water Recycling Centres (WRCs) are all currently discharging over their maximum, allowed consented Dry Weather flow. Any further growth and development should not be allowed to connect into the foul infrastructure at these sites until upgrades have been completed. The lack of capacity at these sites should be highlighted and a reference to phased development should be incorporated in line with timeframes for necessary upgrades presented.

Suffolk County Council comment that the County Council has worked with the District Council to model the likely traffic impacts of the proposed local plan allocations, cumulatively with emerging local plan proposals from Ipswich, Babergh and Mid Suffolk. This will need to be updated as the other Ipswich Policy Area Plans move forward. The Upper Orwell Crossing has been included in the transport modelling. Any future modelling will need to take into consideration any future decisions that are made on the deliverability of the crossing.

For all relevant sites the County Council would expect localised assessment of junction impacts to be undertaken to ensure consideration is given to the transport impacts of local trips.

The strategic evidence suggests that, across most of the District, the development proposed does not have highway impacts which cannot be mitigated through site-specific schemes funded via developer contributions. However, the scale of growth proposed in the Ipswich area is likely to put significant strain on the strategic road network managed by Highways England, and the main local roads managed by Suffolk County Council, and funding from development will be required and over reliance should not be placed on unconfirmed sources of funding. Further consideration is being given to transport impacts at Melton crossroads and the County Council will come back with further advice. Further consideration of the cumulative transport impacts is required, in partnership with neighbouring authorities and Highways England, as well as more detailed modelling of specific impacts.

#### Parish and Town Councils

None received

## Other organisations

The RSPB comment that every housing allocation (except SCLP12.46, Land off Laxfield Road, Dennington which is outside the 13km zone of influence) should have a standard statement within the policy stating that a contribution to the Recreational Avoidance and Mitigation Strategy will be required by the Plan level Habitats Regulations Assessment.

Appropriate Assessment will need to consider whether the in-combination recreational pressure effect of the total allocations can be adequately mitigated through the Recreational Avoidance and Mitigation Strategy. Additional mitigation may be required and consideration must also be given to other impacts, including urban effects and water quality.

It is recommended that the need for Habitats Regulations Assessment is included all relevant site policies.

Suffolk Wildlife Trust comment that they have not assessed every proposed site allocation for ecological value and therefore recommend that prior to any allocations being made the proposed sites are subject to an ecological audit to identify their value and determine whether they are appropriate for allocation. If it is determined that allocation is appropriate, the final version of the relevant site policy should secure any necessary further ecological surveys, mitigation and/or compensation measures. All new development should secure ecological enhancement measures.

## Developers/Landowners

None received

## Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Assessment of capacity at Water Recycling Centres has been undertaken through the Water Cycle Study and where improvements are required this is identified in relation to relevant site allocations.

The transport modelling has been updated in relation to the Final Draft Local Plan, and this has included with and without The Upper Orwell Crossings scenarios. Localised junction assessments have also been carried out, as advised by Suffolk County Council. Requirements have been identified alongside relevant site allocations and in the Infrastructure Delivery Framework.

Requirements for Recreational Avoidance and Mitigation Strategy contributions are referenced in Chapter 10, Natural Environment and Policy SCLP10.1, and it is not considered necessary to repeat this in relation to each site allocation. The Habitats Regulations Assessment has not identified that this is necessary. In combination effects have been considered through the Appropriate Assessment.

Policy SCLP10.1 requires development to positively contribute towards biodiversity and it is not considered necessary to specifically reference this in each site allocation. Consideration has been given to the presence of priority species through the Strategic Housing and Employment Land Availability Assessment and specific requirements incorporated in policies where relevant.

## Neighbourhood Plans

Total comments	Support	Object	Observation
21	0	7	14

### Statutory Consultees

Natural England comment that further consideration of the recreational disturbance implications of the Neighbourhood Plan will be required as the Appropriate Assessment is developed.

Suffolk County Council comment on school capacities, as set out below:

- Aldringham-cum-Thorpe - It is not clear that the catchment school (Coldfair Green) could expand to meet the demand arising from this development. The County Council would consider expanding Leiston Primary – if necessary - as an alternative. Leiston Primary School is c.1.1 miles from the site and it appears that there is a footway for the entire route. Based on current forecasts, it appears that there is sufficient capacity across the two secondary schools to accept the pupils emanating from these sites, without a need to expand the schools.
- Bredfield - Current forecasts suggest that this level of growth may push Kyson Primary School slightly above a desirable level, but within maximum capacity. This is expected to be manageable. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Earl Soham - Current forecasts suggest that Earl Soham Primary has sufficient spare capacity to accept this scale of development. The County Council is considering options for further managing further housing growth within the Debenham catchment. At present it is not clear that this could be accommodated at Debenham High School.
- Easton - Forecasts suggest that Easton Primary School could not expand to accept this level of growth on site. Please see comments above. Thomas Mills High School is forecast to exceed capacity and this development will further exacerbate a shortfall in places. The school has limited ability to expand on its current site, but the school is not landlocked. The County Council will consider whether expansion is likely to be required during the plan period, and advise the District Council in respect of any additional land requirements.
- Framlingham - The County Council may need to expand Sir Robert Hitcham Primary School in order to provide for existing demand and pupils arising from this site and others currently being determined. Based on the work undertaken for the (currently paused) project to expand this school, it is believed that this is possible on the current site. Thomas Mills High School is forecast to exceed capacity and this development will further exacerbate a shortfall in places. The school has limited ability to expand on its current site, but the school is not landlocked. The County Council will consider whether expansion is likely to be required during the plan period, and advise the District Council in respect of any additional land requirements.

- Great Bealings - This scale of development is unlikely to have a significant impact on the school. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Kelsale – cum – Carlton - Impacts would be mitigated at either Kelsale Primary or, indirectly, at the new Saxmundham Garden Village Primary. Based on current forecasts, it appears that there is sufficient capacity across the two secondary schools to accept the pupils emanating from these sites, without a need to expand the schools.
- Kesgrave - This would need to be considered through the neighbourhood planning process, though the scale of growth is very low. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Leiston - The County Council may need to expand Leiston Primary School in order to provide for existing demand and pupils arising from this site and others currently being determined. It is believed that this is possible on the current site. Based on current forecasts, it appears that there is sufficient capacity across the two secondary schools to accept the pupils emanating from these sites, without a need to expand the schools.
- Martlesham - This would need to be considered through the neighbourhood planning process, though the scale of growth is very low. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Melton - Melton Primary School is forecast to exceed capacity. The County Council would look to accommodate demand across the Woodbridge primary schools as a whole. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Playford - This scale of development is unlikely to have a significant impact on the school. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.
- Rendlesham – This scale of development takes Rendlesham Primary School slightly over its absolute capacity (by c.3 pupils). At the same time, the County Council is aware that planning applications for these sites are promoting a significantly higher scale of growth. As part of responding to this Local Plan, the County Council has reconsidered the potential for Rendlesham Primary School to expand from 315 places to 420. Suffolk County Council now has concerns that this scale of enlargement may not now be possible. The implication of this is children from Rendlesham having to be transported – at an ongoing cost to the taxpayer – to other schools. Eyke Primary is just over two miles from these sites, and part of the A1152 between Eyke and Rendlesham has already been assessed as being unsafe as a walking route to school. Given the potential for further development, outside the Plan or through later revisions, the District Council should consider identifying land and funding for a new (second) primary school in Rendlesham. Alternatively, the scale of growth in Rendlesham should be reduced in order that it can be accommodated at Rendlesham Primary. Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

- Saxmundham – This growth would be mitigated through the provision of a new primary school on site 12.26. It is envisaged that this school would need to provide a 210 place (one form of entry) school based on current levels of growth, but a larger site is required to enable expansion in case of future growth or a need to take additional pupils that cannot be accommodated at the existing Saxmundham, Benhall and Kelsale schools. Based on current forecasts, it appears that there is sufficient capacity across the two secondary schools to accept the pupils emanating from these sites, without a need to expand the schools.
- Wenhaston - Wenhaston Primary is forecast to exceed capacity, but it is envisaged that it could expand on site, if required.
- Wickham Market - Wickham Market Primary School is currently forecast to have sufficient capacity to accept the additional demand emanating from this development. Thomas Mills High School is forecast to exceed capacity and this development will further exacerbate a shortfall in places. The school has limited ability to expand on its current site, but the school is not landlocked. The County Council will consider whether expansion is likely to be required during the plan period, and advise the District Council in respect of any additional land requirements.

### Parish and Town Councils

Wenhaston with Mellis Parish Council comment that the village has been incorrectly categorised as a Large village (*comments also made against SCLP3.3 Settlement Hierarchy*). The housing figure for the Neighbourhood Plan of 25 is excessive. In 2013 the Local Plan allocated between 5 and 15 houses for Wenhaston which subsequently increase to 25 with no explanation. 42 have since been built. It would not be possible to achieve the policy within the settlement boundary.

Kelsale-cum-Carlton Parish Council note paragraphs 12.1 – 12.7 and policy SCLP12.1.

Easton Parish Council object on the basis that due to the topography and historic parkland, Easton is unsuitable for a high number of housing and businesses. It has poor infrastructure provision. Easton, Brandeston and Kettleburgh share rural road systems. The villages do not have a shop, and housing will encourage car use. 90 houses between the three villages is too high. Road infrastructure has not been included. Travel plans appear to have not been considered. Greater weight should be given to locations on A or B classified roads, with bus and trains, and shops. The household survey in Easton strongly indicates the community has concerns with traffic volume and safety. More deaths occur on rural roads than urban ones.

Martlesham Parish Council comment that the Martlesham Neighbourhood Plan does not specifically plan for housing growth as it was agreed that the focus of growth in the Parish would be Brightwell Lakes. It is not acceptable to break the target down into Martlesham and Martlesham Heath in order that flexibility can be retained and to resist pressure to develop Land Protected from Development within Martlesham Heath. Welcome the fact that the Plan resists any large scale development in Martlesham.

Framlingham Town Council comment that Policy SCLP12.1 should include the sentence from paragraph 12.3 that 'Once 'made' a Neighbourhood Plan forms part of the Development Plan for the District.' And that in Appendices H and I which states 'The Council supports the Neighbourhood Plan as the mechanism for residential development.' The Town Council stresses the importance of the

need to maintain the proposed number of 50 new houses in the plan period in view of the large number of homes recently permitted outside of the Local Plan and Neighbourhood Plan and the resulting lack of infrastructure. The Town Council endorses the Neighbourhood Plan as the means for identifying land for development.

Aldringham-cum-Thorpe Parish Council comment that the table in SCLP12.1 should show 53 for Aldringham and Thorpeness as shown in table 3.5.

Saxmundham Town Council comment that the draft Plan is too prescriptive and takes away almost all of the local choice and discretion, and imposes a top down approach that breaches the spirit of localism and local democracy. Those who have completed their plans are given more scope for choice and decision making.

### **Other organisations**

Suffolk County Council AONB Team comment that additional text should be added to this policy to highlight the need for Parish Councils or Neighbourhood Forums preparing Neighbourhood Plans covering settlements located in the AONB or its setting to consider the impact of Neighbourhood Plan proposals on its setting.

### **Developers/Landowners**

Thorpeness and Aldeburgh Hotels Ltd object on the basis that Site 981 should be allocated for mixed use development of up to 65 dwellings and sports uses associated with the golf and country club. Separate representations will be made to Aldringham cum Thorpe Neighbourhood Plan. *(Note, respondent has also commented under Appendix I).*

Suffolk Constabulary object on the basis that national guidance expects development to be directed to locations which are accessible by non car modes and encourages the re-use of previously developed land. More development should be directed to Martlesham Heath. It is a sustainable location that is accessible by a range of modes of transport and contains a good range of services and facilities. The Suffolk Constabulary site is a previously developed site within the boundary of Martlesham Heath which has no constraints to development. The site should be allocated for 250 dwellings. *(Note, comments also logged under Appendix I).*

Hopkins Homes comment that they are concerned over the reliance on Neighbourhood Plans to deliver a significant proportion of the new housing particularly in settlements such as Leiston and Wickham Market. Many of the District's Neighbourhood Plans are at an early stage in their production or have been delayed and there is no guarantee they would pass referendum. Where plans have been made, there is no guarantee they would be reviewed in a timely manner. Where Neighbourhood Plans are being produced this should not preclude the Local Plan from allocating sites. As the Local Plan is falling short in delivering growth, it is important to improve direction given to these areas. The Plan does not provide an indicative housing number for Woodbridge, which leaves Woodbridge with no direction for growth and fails to positively meet development needs of the settlement.

## Members of the Public

### Object:

The minimum number of dwellings stated in the Neighbourhood Plan is 32 dwellings. This should be amended.

Object to the layout of South Saxmundham Garden Neighbourhood. *(Note, respondent also commented against Policy SCLP12.26 South Saxmundham Garden Neighbourhood)*

### **How these comments have been taken into account in the Final Draft Local Plan:**

The Habitats Regulations Assessment has considered all policies, including SCLP12.1 Neighbourhood Plans. Neighbourhood Plans will also require screening in relation to the Habitats Directive.

The school capacity information has been included in the Infrastructure Delivery Framework, based on ongoing engagement with Suffolk County Council. In addition, text has been added to the supporting text in relation to SCLP12.1 to clarify that Neighbourhood Plans will need to consider infrastructure requirements.

The figure of 25 for Wenhaston relates to the Plan period to 2036. Its position in the settlement hierarchy has been reviewed and it is categorised as a Small Village. However, it is considered that the figure of 25 dwellings remains appropriate considering that the Planning Practice Guidance allows for some of this figure to be delivered through windfall and considering land availability in Wenhaston.

In relation to Easton, the transport modelling has not identified that there would be particular capacity issues associated with the roads in the area based on the levels of growth proposed. Road safety has been considered by Suffolk County Council through the site assessment process.

The housing requirement for the Martlesham Neighbourhood Plan area is now shown as one figure of 20.

The supporting text at paragraph 12.3 states that once made a Neighbourhood Plan forms part of the Development Plan. It is not necessary to include this in the policy as it is established in legislation.

The purpose of the table in SCLP12.1 is to set out the figures to be planned for through Neighbourhood Plans, and this is in addition to that already committed. However a cross reference to Table 3.5 has been added to the footnote for clarity.

The approach for Saxmundham reflects the strategic growth being planned for the District, should the Neighbourhood Plan wish to plan for some housing it should be noted that the figures set out in Policy SCLP12.1 are minimum.

Policy SCLP10.4 contains reference to policy for the AONB, and Neighbourhood Plans would need to be in general conformity with this. It is therefore not necessary to repeat within this policy.

The promotion of site 981 is noted, however it is appropriate for the site promoter to engage in the Neighbourhood Plan process.

Comments in relation to the promotion of the Police Headquarters site are noted. As the reasons

around allocating this site are specific to this site, it would not be an appropriate alternative to identify a higher housing requirement for the Neighbourhood Plan area.

The approach to providing Neighbourhood Plan areas with an opportunity to plan for their housing requirements is consistent with the NPPF. Where appropriate, the Local Plan does plan for growth in Neighbourhood Plan areas (for example, in Saxmundham and Martlesham). The supporting text recognises that where Neighbourhood Plans have not been forthcoming by the time at which the Local Plan is reviewed, it may be appropriate for the Local Plan to identify opportunities for further growth in those areas. The focus for of the strategy is not on Woodbridge, however site allocation SCLP12.33 has been included to reflect the specific circumstances of the Football Club.

The figures in SCLP12.1 reflect and apportionment of District need, rather than a figure related to local needs.

## Site Allocations

Total comments	Support	Object	Observation
9	1	3	5

### Statutory Consultees

None received

### Parish and Town Councils

Ufford Parish Council comment that they support that sites in Ufford are not proposed for allocation.

Kelsale-cum-Carlton Parish Council note paragraphs 12.8 to 12.16 and Table 12.2.

Hacheston Parish Council comment that Hacheston is a commuter village with limited services and facilities. The primary focus has been to identify housing sites. The same focus should be applied to identifying sites for infrastructure. The status of completed or in-process Neighbourhood Plans of Framlingham, Wickham Market, Rendlesham, Saxmundham and Woodbridge is unclear as is the influence they will have on determining the level of development at these locations.

The level of development being considered will have a major effect on Hacheston in terms of traffic (volume of commuters and HGVs, and speed) and access to health, welfare and leisure services. Developments are proposed in Hacheston without proper consideration of the infrastructure needed to support them.

Residents are concerned about developments which counter stated policies, for example on affordable housing, and development beyond the current Physical Limits Boundary. Residents are also concerned about impact of traffic from development elsewhere. In September 2017 residents voted to have limited development and supported by infrastructure.

A realistic assessment of infrastructure issues needs to take place which takes account of the impact on Hacheston. Hacheston residents and its Parish Council feel that their views are not sufficiently taken into account. The Parish Council comment that no sites are proposed for allocation in Hacheston and that the Settlement Boundary has been amended to include allocation SSP9 which has permission.

### Other organisations

The Forestry Commission are unable to comment on the Plan but provide information for consideration. Details on policy and designation of ancient woodland are provided, long with Standing Advice on Ancient Woodland and Assessment Guide and Case Decisions.

With any proposals that impact on the Public Forest Estate the Forestry Commission is a party to the application. If the planning authority takes the decision to approve an application which may impact on Ancient Woodland sites the FC may be able to give further support in developing appropriate

conditions in relation to woodland management mitigation or compensation measures. The Standing Advice states that ‘Ancient woodland or veteran trees are irreplaceable, so you should not consider proposed compensation measures as part of your assessment of the benefits of the development proposal’.

It is suggested that the Council takes regard of any points provided by Natural England about the biodiversity of any such woodland.

The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to protect, improve and expand woodland in England.

Sport England comment that they would object to any allocations that affect existing indoor or outdoor sports facilities, unless replacement facilities are provided as part of the proposal which are equivalent or greater in terms of quantity, quality, accessibility and are provided prior to the loss of the existing site.

### **Developers/Landowners**

Suffolk Constabulary object in relation to the site selection process on the basis that the Police Headquarters site, Martlesham, (site 999) is available. It is recommended that the site is assessed against the Strategic Housing and Employment Land Availability Assessment criteria to demonstrate that it should be allocated. The proposed development would provide a mix of house types and is a brownfield site. The assessment of the site against the suitability criteria in the Strategic Housing and Employment Land Availability Assessment demonstrate that the proposed development would mostly score ‘green’, with ‘amber’ scores for utilities infrastructure, contamination, biodiversity and historic environment. It is noted that there are no ‘red’ scores for the site. The site provides opportunities for cycling and walking. *(Note comments are also logged under Appendix I).*

### **Members of the Public**

#### Object:

Object to the proposed allocations in Felixstowe on the basis of a lack of housing need in Felixstowe.

Object to proposed development on the Felixstowe peninsula and consider that the criteria for defining a Large Village is too restrictive. Trimley St Martin, Trimley St Mary, Kirton and Falkenham are not ‘large villages’ and will lose their identities.

#### Observation:

Concerned that site allocations are based on land put forward by landowners. Using good agricultural land for housing development may benefit landowners and developers but may not be the best outcome for housing needs, the environment, road users, water or sewage requirements.

### **How these comments have been taken into account in the Final Draft Local Plan:**

The Local Plan does not propose any new development in Hacheston. Impacts on the road network

have been considered through transport modelling and this does not identify and specific impacts in Hacheston. Requirements for infrastructure are identified in the Infrastructure Delivery Framework. Infrastructure considerations have been part of the site identification process, including taking opportunities to deliver school expansion for example.

The existence of ancient woodland has been considered through the Strategic Housing and Employment Land Availability Assessment.

The existence of existing sports facilities has been considered as part of the Strategic Housing and Employment Land Availability Assessment. Where allocations are proposed on sites which have sports facilities (SCLP12.3 Felixstowe Garden Neighbourhood, SCLP12.25 Police Headquarters and SCLP12.33 Woodbridge Town Football Club there is a policy requirement for protection / enhancement / relocation of facilities.

Under the methodology for the Settlement Hierarchy Large Villages are identified due to their range of facilities, and can encompass a range of scales. Kirton and Falkenham are small villages.

The approach towards considering sites put forward by landowners follows national guidance. Sites need to be deliverable and therefore a willing landowner is needed. There are limited opportunities for brownfield allocations in the District.

## Policy SCLP12.2: Strategy for Felixstowe

Total comments	Support	Object	Observation
55	4	31	20

### Statutory Consultees

Historic England welcome the commitment to the conservation areas in Felixstowe, but suggest that bullet “g” could be improved with a consideration of enhancement.

Suffolk County Council outline their statutory duty to ensure sufficient provision of early education facilities. Increased provision for early years education is needed in order to ensure that requirements arising from the plan are delivered through a variety of new settings which are at new primary schools or standalone provision.

Suffolk County Council highlight concerns about the increased safety on the junction of Langer Road / Beach Station Road as outlined in the Transport Model. Expect that relevant Transport Assessments are undertaken to assess and look to reduce their impacts at this location.

Natural England outline that these allocations will require an assessment of the impacts on landscape and designated sites including project level Habitats Regulations Assessment. Design and landscaping including greenspace and net gain should take account of the location in or the setting of the protected landscape.

### Parish and Town Councils

Felixstowe Town Council outline that they understand the concerns expressed by members of the public, but the Town Council recognises the need to strategically and carefully plan for a good mix of housing to support aspirations of existing residents. The North Felixstowe Garden Neighbourhood will secure infrastructure necessary to appropriately deliver enhancements for the wider Felixstowe community. The Town Council therefore support the overall ambitions of the First Draft Local Plan but have the following suggestions to make:

- Infographic on page 179 should include analysis for inward and outward commuting.
- Policy SCLP12.2 should read ‘...retain its role as a thriving coastal resort and major centre with a comprehensive...’
- Policy SCLP12.2 (a) should read ‘...employment types including tourism and tech-related enterprises, and sites are...’
- Policy SCLP12.2 (f) should read ‘...regeneration and additional tourist attractions are brought forward;’
- Policy SCLP12.2 (i) should read ‘The risk of flooding and coastal erosion is carefully overseen...’
- Policy SCLP12.2 (j) should read ‘...the needs in particular of younger people entering the housing market and those of an ageing population and changing demographic...’

- Additional point added to Policy SCLP12.2 to read 'Open spaces are preserved, enhanced or otherwise re-provided to ensure that all residents have easy-access to informal recreational green space.'

### Other organisations

Ferry Road Campaign Group outline:

- Serious reservations that the town at the end of a narrow peninsula will be able to sustain the level of housing identified in the Local Plan. The Council has accepted Government housing targets without challenge and not taken into account the potential effects of Brexit.
- The Employment evidence does not support the 'ambition' for housing growth and identifies that congestion on the A14 is likely to be a significant barrier to increased growth.
- More consideration should be given to how the Town Centre develops and the plan should look to bring land identified as commercial use into residential use.
- Better leisure facilities would clearly be an advantage but relocating this from a central location is a high risk and will reduce visitor offer.
- The Council should respect the value of public open space at Eastward Ho and insist on retention of public rights of way.

Suffolk Wildlife Trust consider that Policy SCLP12.2 (h) fails to set high enough environmental target. Does not include a commitment to secure ecological enhancements as part of the growth of the town. Policy should include measures to secure ecological enhancements including creation of new areas of green infrastructure.

Save Felixstowe Countryside overwhelmingly object to the Local Plan, it is not supported by local communities and is seriously flawed and needs to be re-written. Objections include:

- Distribution of housing and housing target for Felixstowe is ridiculous.
- Loss of Grade 1 and 2 farmland which should be preserved.
- Loss of habitat enjoyed by wildlife.
- Focus of housing should be in the location of the emerging industries and not major employer locations.
- Absence of alignment of housing distribution in accordance with the published ratios of median house prices in an area.
- Lack of acceptable that Felixstowe is at the end of a peninsula with fragile transport infrastructure.
- Focus on housing should not be based upon a single industry which is becoming more automated.

East Suffolk Liberal Democrats see the potential for commercial and residential development across the Felixstowe Peninsula, however see problems with the very large development proposed to the northern boundary. Walton and the Trimleys become absorbed and traffic flows become harder. A much more imaginative approach is needed as the current plan leads to concerns about noise, traffic, lighting, loss of farmland and destruction of the rural nature of the area.

Ferry Road Campaign Group comment that there is no reference in the Local Plan of the risks to an increased population on a peninsular with only one main road in and out. Major infrastructure provision is required to protect citizens, particularly given the increased

risks associated with having the largest container port in the UK located in this area and a nuclear power station within a 35-mile radius.

### **Developers/Landowners**

Suffolk Coastal District Council support for the objectives set out within the draft strategy for Felixstowe and that the Garden Neighbourhood at North Felixstowe will seek to deliver the growth as appropriate.

M Scott Properties outline that Trimley St Martin is considered throughout the draft plan as part of Felixstowe and therefore is applicable under policy SCLP12.2. Strongly support the inclusion of criteria (j) within Policy SCLP12.2 as this will respond to the demographic needs of the Felixstowe Peninsula.

### **Members of the Public**

#### Objection:

The Local Plan process is deficient in involving and empowering local people. Many residents are not involved because 'the Council will do what it wants'. The views of residents and campaign groups should be sought and acted upon through active engagement with the Town Council and build these conclusions into the Local Plan. Given the economic, employment and housing importance of Felixstowe to the District Council, the Planning Committee should be re-constituted so that at least half are councillors from Felixstowe and the Trimley Villages.

Felixstowe Town Centre should be given more consideration as changing shopping habits mean there is opportunity for the Council to take a radical approach and build affordable homes in these locations to bring life back into the high street.

Respondents comment that Felixstowe will never be able to support such a large number of new houses. Town unable to cope with traffic and moving the swimming pool out of the town is a terrible idea.

Respondents comment that moving the leisure centre from the seafront will result in less footfall for the town.

It is commented that before the leisure centres are closed there is a need to see what will be put in its place.

Respondents comment on concern about the level of HGV traffic on the A14 and additional traffic on the roads across Felixstowe. Roads are currently unable to cope, what will it be like in the future?

It is commented that Trimley High Road is not fit for all this traffic.

There should be more provision for new footpaths/bridleways.

Respondents comment that the Port of Felixstowe is becoming more automated but job opportunities will decrease over time leading to more people having to travel out of peninsular for employment.

A number of respondents raise concerns about loss of green areas, demand on education, increase in cars and getting an appointment with the doctor.

A number of respondents query why Felixstowe is being required to take a very large proportion of future housing. Residents of Felixstowe are owed a decent explanation as to why the town has been allocated such a high proportion of development.

Respondents comment that proposed developments will not supply the kind of housing that the local community require – affordable housing for local youngsters, elderly people wishing to downsize from larger expensive properties. Generation of children and young adults will never be able to afford this housing.

Respondents comment that the current location of the leisure centre is a far better proposition for both tourists and local alike.

Respondents comment that development at Eastward Ho will have a significant adverse effect on the character and appearance of the surrounding countryside and would bring about another concrete jungle.

It is commented that development needs to respect the 'quiet lane' status of Gulpher Road.

The Grove is used by people all the time and needs to remain for the many people who walk there.

Query why the Local Plan letting so much land to be used for housing and lorry park.

Respondents comment that Town Councillors seem to have rolled over and are helping the destruction of huge amount of green belt land around the town where there is brownfield land available.

The thoughts and concerns of local population are totally ignored as we all know that this plan is a foregone conclusion.

Respondents comment that building thousands more houses at the end of the peninsular with no alternative routes is not positive for the area.

Respondents comment that the AONB, habitats and landscape are not being protected from inappropriate development.

Understand the need for expansion, but do not feel the plans take into account the best considerations for the town and proposed volumes of development within the town are not sustainable.

Reading the article online it sounds like it would be better to develop Peasenhall.

Respondents raised concerns about the ability of Felixstowe Academy to accommodate demands resulting from proposed level of growth.

Query why the plan does not include a 'brownfield site first' strategy. There is plenty of brownfield land available around Felixstowe – such as Deben High School.

Observation:

Felixstowe is a seaside town missing out on so much. People are leaving the town to go elsewhere and therefore the town needs more attractions (such as a sealife centre, water sports, skating, tenpin bowling, climbing wall) on the seafront.

Look forward to some of the plans and see an exciting future for Felixstowe, although do not feel as though the Grove should be built on. Felixstowe needs a large park which will be a haven for birds and mammals.

Plans to relocate the leisure centre will work against strategy to bring a vibrant town centre, no mention of additional car parking facilities which is already a major issue in Felixstowe. Government have issued a moratorium on shared space areas as these are not accessible to all. Ironic that the Council is planning to build on Grade 1 farmland in order to enhance green infrastructure networks.

The Plan needs to be proactive in addressing traffic issues on the A14 in respect of commuters and HGVs.

Why do all the statistics seem to show a house for roughly every two people but we have a housing shortage. People can not afford housing so who are all these people that need housing? Or is this to house over flow from surrounding town/cities?

Welcome the positive drive to provide housing for local people to ensure a vibrant and mixed community but there is a need for housing for local people. There seems to be no attempt to consult with local residents on this.

Felixstowe does not have to expand to survive – growth is not essential to maintain an image as a thriving resort.

Great deal of loss of valuable agricultural land already seen, how can we be sure that other parcels of land will not be used for future development?

Would like to see Felixstowe become a model for a sustainable town. It could become the first town that says we will not build any more homes until we have filled up all the empty accommodation such as above shops, flats and high tax on second homes.

**How these comments have been taken into account in the Final Draft Local Plan:**

Criterion (i) refers to enhancements to the Conservation Areas.

Education and early years provision is considered in relation to individual site allocations in Felixstowe, based upon information provided by Suffolk County Council.

The transport modelling has included further junction modelling for junctions showing particular issues, as advised by Suffolk County Council. Requirements are detailed in the Infrastructure Delivery Framework.

Habitats Regulations Assessment has considered whether there is a need for individual allocations to be subject to a project level HRA. Where this is the case it is referenced in the relevant policy. Criterion (j) of the policy includes reference to protected habitats and designated landscapes.

The suggestions made by Felixstowe Town Council have been included in the policy.

The housing requirement for the District is calculated using the standard method as per the National Planning Policy Framework and the Planning Practice Guidance.

Whilst Felixstowe is on a peninsula, growth in Felixstowe provides opportunities for sustainable travel which a more dispersed approach would not. The growth identified is focused around delivering improvements to the leisure facilities in the town. There are limited opportunities for brownfield development to meet the housing needs of the District.

The Plan seeks to deliver improvements to infrastructure as part of the growth identified. Requirements for enhancements to infrastructure are included alongside relevant site allocations and details are contained in the Infrastructure Delivery Framework.

Felixstowe is one of the parts of the District that provides numerous employment opportunities, and also provides opportunities for sustainable modes of homes to work transport.

The Strategy for Felixstowe seeks to maintain the vibrant town centre and supports opportunities for regeneration.

The creation of new areas of open space and enhancements to open space is covered by criterion (m) of the policy.

Policy SCLP12.16 has been included which sets out a policy approach to support new leisure and tourism uses on the existing leisure centre site, and requires at least the same number of car parking spaces to be provided.

Criterion (l) of the policy supports the provision of housing to meet the needs of younger and older people. This is carried forward through the site allocations in the Plan.

Provision of leisure facilities on a new site provides an opportunity to significantly improve provision. In addition, should the existing leisure centres be redeveloped on their existing sites, there would be a need for facilities to be closed for a period of time whilst they are redeveloped.

The policy for the Garden Neighbourhood (SCLP12.3) seeks to protect The Grove woodland and Eastward Ho, and it is expected that Gulpher Road would not be used for vehicular access. Refer also to responses received under policy SCLP12.3.

## Policy SCLP12.3 North of Felixstowe Garden Neighbourhood

Total comments	Support	Object	Observation
211	19	166	26

### Statutory Consultees

Natural England outline that the allocations will require an assessment of the impacts on landscape and designated sites, including project-level Habitats Regulations Assessment. Design and landscaping including greenspace and Net Gain, should take account of the location in or the setting of, the protected landscape.

Historic England object to the Garden Neighbourhood as there is no mention of the considerable heritage surrounding the site. It is critical that such considerations are included within the policy and supporting text. Request that a heritage impact assessment is undertaken to inform whether development is possible and how it can be accommodated by avoiding harm. Consideration needs to be given to the distribution of open space and their potential use as a landscape buffer for designated heritage assets of Gulpher Hall and Candlet Farmhouse.

Environment Agency outlines that paragraph 12.26 should acknowledge that where there are any areas of development situated within Habitats Directive sites, these have much more stringent water quality standards. It is important that these tighter standards and the existence of these are acknowledged in the plan. Paragraph 12.39 makes no reference to the Trimley St Martin Water Recycling Centre and the upgrades necessary to enable growth. Policy and supporting text need to provide clarity in respect of the Trimley St Martin Water Recycling Centre.

Suffolk County Council suggest wording of Policy SCLP12.3(e) is amended to read ‘Public rights of way on and off the site should be preserved and enhanced, and opportunities sought to provide opportunities for countryside access.’

Suffolk County Council welcome the requirement to deliver specialist housing as part of the Garden Neighbourhood. Text should be amended to refer to housing to meet ‘the specialised housing needs of older, younger and vulnerable people.’

Suffolk County Council suggest that the following wording should be added to the supporting text in respect of archaeology. ‘This large allocation of over 145 ha spans an area of high archaeological potential and sensitivity, with Prehistoric, Roman, Early Saxon, Medieval and other multiperiod remains across the area Development here will undoubtedly have an impact on archaeological sites. It has not been subject to systematic evaluation, but information in the Historic Environment Record records significant cropmarks, indicating remains. In the western part of the site, this may include a barrow cemetery. Roman and multiperiod remains indicate a site in the northern part of the allocation. World War 2 features may also constitute non- designated assets under the National Planning Policy framework. Suffolk County Council have highlighted that an archaeological assessment should be required to inform a Masterplan, to inform viability of schemes, mitigation

requirements and conservation in situ of significant remains. Any mitigation should involve outreach proposals.'

Suffolk County Council outline that land identified under SCLP12.3 needs to include an assessment of material to decide if prior extraction/use on this site is desirable for minerals.

Suffolk County Council suggest additional criteria added to Policy SCLP12.3 to read 'A flood risk assessment which considers the cumulative impact on receptors off-site and includes proposals for water re-use consistent with local holistic water management projects.'

Suffolk County Council outline that it is important all opportunities to increase sustainable permeability into the site and between the site and central Felixstowe are investigated as part of the site master planning, including improving cycle links. The modelling report indicates capacity issues associated with the access arrangements. Access arrangements to the Garden Neighbourhood should be future proofed so as to function within capacity for the plan period.

Suffolk County Council seek to establish a new 630 place primary school as part of the Garden Neighbourhood. In addition the County Council is exploring opportunities for providing additional capacity in the Trimleys area.

Suffolk County Council envisage that Felixstowe Academy will need to be expanded over the plan period to meet demand arising from this growth.

Anglian Water highlight that in paragraph 12.39 reference is made to there being a need to upgrade sewerage network treatment facilities at Trimley St Martin Water Recycling Centre. Upgrades of this nature are wholly funded by Anglian Water Asset Management Plan and the text should be amended to remove reference to developer contributions in this paragraph.

Anglian Water outline that contributions are sought under the Water Industry Act 1991 to supply water and/or drain site effectively through planning obligations or standard charges under Planning Legislation. Therefore the text should be amended to remove reference to developer contributions. Reference should be included within Policy SCLP12.3 to reinforcement of existing water supply and foul sewerage networks to enable the development of this site. Suggested policy wording to read 'There are existing water mains and sewers in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account' and supporting text to read 'This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required'

### **Parish and Town Councils**

Trimley St Mary Parish Council outline that a small area of the proposed development is within the parish of Trimley St Mary and therefore would expect to be fully involved in any consultations, discussion or working groups set up to discuss these proposals.

Felixstowe Town Council outline that the Garden Neighbourhood concept presents a unique opportunity to provide an iconic gateway to the town and the masterplan should address this by

pursuing high-quality design throughout. Aspirations of paragraph 12.34 are fundamental and should be strengthened. The Policy should be clear about specific requirements with a site specific S106 to be secured and tied to the development. The Garden Neighbourhood needs to be fully interconnected with itself and the rest of the town. An appropriate spine road should be considered. The Town Council suggest the name could perhaps refer to Candlet area rather than North Felixstowe to help create a sense of community that is part of an integrated Felixstowe settlement area.

- SCLP12.3 (d) should be amended to read ‘Appropriate substantial open space provision for both informal and formal recreational opportunities to be retained or created.’
- SCLP12.3 (j) should read ‘Employment land for high quality non-port related small business units.’

Waldringfield Parish Council have concerns regarding the scale of Policy SCLP12.3 and the impact this will have on the A14/A12. It is widely accepted that the A14 Orwell Bridge is already at full capacity and that both the A12 and A14 are going to be under significant pressure when Brightwell Lakes comes through.

### **Other organisations**

The Ferry Road Campaign Group outlines that the proposed development will have a profound effect on the town of Felixstowe. Development of this scale should be community led by Felixstowe Town Council with a local referendum on the outcome to endorse or reject the plan in the form of a Neighbourhood Plan.

The Ferry Road Campaign Group highlight the merits in the master planning approach but identify that the track record of this approach has not been good. There is little or no trust in the planning process or the council to balance the needs of existing residents with that of new development. This proposed allocation provides an opportunity for the District Council to change the way they do things and work with, rather than against the existing community.

Suffolk Coast and Heaths AONB unit strongly support the inclusion of significant areas of green infrastructure and open space which should be well designed to deliver Suitable Alternative Natural Greenspaces to relieve recreational pressure on the Special Protection Areas. A significant green buffer should be provided to minimise the landscape impact on the AONB. The AONB team would welcome opportunity to participate in any future workshops as the masterplan evolves. Policy SCLP12.3 should be amended to identify potential impact on the setting of the AONB and any mitigation needed.

Suffolk Constabulary request that an additional paragraph is included to read ‘Additional provision for police facilities, including funding for equipped Police Officers, including Police Community Support Officers and backroom staff, police vehicles, automatic number plate recognition technology and floor space is required.’

Suffolk Constabulary request that the policy text be amended to read “Contribution will also be required towards any necessary off-site infrastructure requirements, including health provision, police facilities and water recycling.”

The Department for Education welcome the inclusion of the requirement to provide a primary school including early years provision as part of the Garden Neighbourhood and note the proposal to develop further detail through a collaborative master plan approach.

Suffolk Wildlife Trust highlight that the proposed allocation should not be taken forward for adoption without an Appropriate Assessment to determine the impact the development may have on the Special Protection Areas. Support the intention to enhance biodiversity networks as part of the Garden Neighbourhood. It must be ensured that this is the foundation of the design of any community. It must also be ensured that the ecological value of the area is fully assessed prior to any allocation in order to adequately safeguard any existing areas of ecological value and allow a Neighbourhood to be designed that delivers significant environmental gain.

RSPB support the requirement to preserve and enhance biodiversity networks but recommend that reference is needed to Habitats Regulation Assessment and a contribution to the RAMS should be explicitly included in the policy.

The Felixstowe Society would like to see more emphasis on ensuring that water and sewerage demand are fully met. The failure of sewers in Ferry Road is well known.

The Felixstowe Society of Allotment and Leisure Gardeners outline that reservations about the access onto Candlet Road beside the allotment site remain and hope that pedestrian and cycling access to Felixstowe town centre and medical centre will be maintained. There appears to be a strong case for a distributor road to connect Ferry Road with the proposed new roundabout at Walton Green passing to the north of the Grove. Benefits in having all the leisure provision in the vicinity of the Grove and Abbey Grove so that parking and other facilities can be shared. Although it is stated that this does not mean that they support the closing of the sea front swimming pool.

Save Felixstowe Countryside outline that slabbing the countryside with tarmac and concrete on the highest quality farmland and picturesque environment is dictatorial environmental vandalism. The proposals will destroy Felixstowe as a resort and turn the town into a slum.

East Suffolk Liberal Democrats see problems with the very large development at north Felixstowe which will absorb into a continuous stream of housing. Traffic flows could become harder and the issue of narrow roads has not been addressed. A much more imaginative approach to providing new housing in the area is needed.

### **Developers/Landowners**

Trinity College Cambridge fully supports the principle of a masterplanned approach to the housing, leisure, landscape and infrastructure provision of this site. Access could be achieved through a fourth northbound arm on the roundabout to be delivered as part of the Walton North development along with opportunities for sustainable travel.

Christchurch Land and Estates support the allocation of the Garden Neighbourhood and specifically the portion which benefits from outline planning permission. The site is a sustainable and deliverable location for development and can be developed in a high quality, sensitive manner and capable of addressing the Council's policy requirements.

Suffolk Coastal District Council broadly support the take up of the garden neighbourhood within this part of the district. With a well designed neighbourhood the area can be developed comprehensively with high quality landscape setting and focus on green corridors and open space. To support leisure and recreation opportunities and support healthier lifestyles.

Suffolk Coastal District Council highlights the importance of residential amenity as part of the Garden Neighbourhood. Proposals take into account the impact on residential amenity of properties on Links Avenue.

Suffolk Coastal District Council supports the policy which identifies the positive impact green infrastructure has on biodiversity and geodiversity, and will seek to expand natural green spaces and connecting routes as part of the masterplan. The masterplan will allow for considerable high quality natural recreational routes to be created to minimise the effect on European Sites, particularly the Deben and Orwell Estuaries.

### **Members of the Public**

#### Support:

The sooner we can start to build these much needed houses the better. We must build for the future of our great town for the sake of our children and grandchildren.

Support the development because the young people of Felixstowe deserve an adequate supply of reasonably priced housing and currently the laws of supply and demand don't allow for this. Proper affordable houses for young families to rent or buy are needed.

The town could do with more houses, land to the north of Felixstowe is probably the only open piece of land in the town. Just wish that there is actually more affordable housing than luxury developments.

Support the proposed new development but urge on side of caution as the current high school is over subscribed. It is vital that more places are found to educate children of all ages. Need extra investment in the current academy.

Cllr Kerry is supportive of the policy, it represents a great opportunity to expand and update the leisure offer across the district. The master plan approach will deliver the infrastructure needed to sustain the population and would take pressure off the Trimleys as a potential provider of more dwellings.

#### Object:

A large number of respondents query why Felixstowe is being given even more houses, the level proposed is disproportional when compared to the existing town and will result in a significant loss of character and quality.

A number of respondents comment that Felixstowe needs to be an affordable home destination and many of these new homes will not be affordable to local young people who will continue to leave the town in large numbers.

A large number of respondents comment that the proposed development will ruin the countryside, is large scale vandalism to wildlife and environment and also loss of agricultural land for food production, and query the need for all new housing developments to be built on the fringes and buffer of the AONB.

A large number of respondents comment that existing road infrastructure of the A14, Trimley High Road and other local roads are already overstretched and new development will create adverse impacts on network including Gulpher Road which is a quiet lane.

A large number of respondents comment that The Grove, allotments and Eastward Ho is a well used and enjoyed area of open space and should not be built on. It provides opportunities for recreation, tranquillity and open space for all ages.

A large number of respondents comment that the town is lacking in services with no police, no hospital, no fire service, not enough schools, not enough doctors or dentists, distant from hospitals, elderly care provision and sewerage. The future development will stretch infrastructure further.

A number of respondents comment that it is devastating to lose the open space, beautiful countryside and woodland which is well used by local residents and provides land for farming.

Respondents comment that Gulpher Road is a designated quiet road, the increase in traffic will cause major problems for this road.

A number of respondents comment that Felixstowe is at the end of a peninsula and therefore has a limited area for development.

A large number of respondents comment that the leisure centre and Brackenbury sites should be redeveloped and not be moved away from their existing sites.

A number of respondents question how the leisure centre and Brackenbury are at the end of their lives and suggest the existing sites should be redeveloped.

Scale of development warrants a masterplan but there is no trust in the planning process or in the Council. There should be a neighbourhood plan which will dictate the views of residents and enable the local community to challenge developers who seek to deviate from the agreed outline plans.

Respondents comment that there is a need for clear information as to where the increased in employment and jobs will come from.

A large number of respondents comment that employment opportunities in the town are changing away from the Port (due to automation) to mainly “service” industries which only attract minimum wage.

Development north of Felixstowe will have a direct and indirect impact on the veteran trees, woodland and the wildlife in this area and will be contrary to guidance in the Biodiversity Action Plan, the Woodland Trust and Natural England.

Respondents comment that run off from new buildings will worsen the issue of saturated fields on the Grove.

There are two natural springs in the area that will impact future development of the site.

A number of respondents comment that the Council should return to the position as advocated during the appeal against Christchurch Land Estate and reinforce that the area north of Felixstowe provides a strong physical barrier to the town's edge.

Respondents query whether redeveloping the existing leisure centre will ensure the health and vitality of the resort as outlined in the Felixstowe Peninsula Area Action Plan, and what has changed.

Respondents comment that waste water treatment is a major issues in the Walton and Trimley areas, the system is already unable to cope.

A number of respondents comment that the government want people to keep fit and yet the proposals look to take away the spaces where people can exercise, walk and play.

Housing need should be based on projected household growth and needs of households that are inadequately housed in the area. The Council should be held to account on the overall number of homes built. New housing should be based on the identified needs of local people and what they can afford.

Respondents comment that development should be focused on what will help the town first as the roads need completely re-doing. Houses should be better spread across Suffolk.

Councillor Deacon objects to the strategy for Felixstowe as the level of housing indicated far outstrips local demand and will require a sizeable inward migration to the town to occupy the new properties. Where will all of these new residents find employment, go to school, visit doctors and dentists? The strain on the local infrastructure is already creaking. The creation of the Garden Neighbourhood will mean the destruction of much loved countryside and the loss of valuable agricultural land and natural habitats. It is suggested that the District Council revises its plans and spreads the housing burden across the district.

Observation:

Respondents comment that school facilities are in a terrible state with children already being bused to other schools outside of Felixstowe which is unacceptable.

A number of respondents query why is the Council is not building on brownfield sites first.

The number of houses seems excessive, but on the face of it if the development is done properly with the correct infrastructure then it is acceptable.

A number of respondents raise concern that the public consultation is just a tick box exercise with little opportunity for the general public to be involved.

Provision for charging of Electric Vehicles is required across every household.

The Grove area should be extended through significant new tree planting if the plans are approved.

A number of respondents comment that there is something wrong with the political system, local Councils including Felixstowe appear to rubber-stamp any District Council decisions and are hidebound and incapable of proper discussions.

If this is genuinely predicated to sustain a thriving region and place to live then so be it. Concern about the lack of detail in the proposals. Query whether the impact on traffic been considered – sensible to provide new access roads along with separate cycle and pedestrian access. Important to retain the green areas and increase recreational areas and opportunities. Important to ensure that affordable housing is delivered and that developers do not escape contractual terms that have been agreed at the outset.

Impression is that most people support the plans but are not vocal in their support, where as the minority who oppose the plans are very vocal and emotive.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy incorporates the principles of garden cities, in that development would be designed around provision of green infrastructure and the creation of a community with a mix of uses provided. The policy seeks to ensure that open spaces and enhancements for biodiversity are incorporated within the development.

There are limited opportunities for brownfield development in the District to meet housing needs. Dispersing housing growth across the District would provide fewer opportunities for provision of key infrastructure. Alternative strategies have been considered as part of the production of the Plan, however the development of the Garden Neighbourhood will provide an opportunity to deliver new leisure facilities for Felixstowe along with other infrastructure, whilst also helping to meet housing needs.

Provision of leisure facilities on a new site provides an opportunity to significantly improve provision. In addition, should the existing leisure centres be redeveloped on their existing sites, there would be a need for facilities to be closed for a period of time whilst they are redeveloped.

The policy includes a requirement for some employment uses to be provided as part of the Garden Neighbourhood, and the site will also be well related to other employment uses with pedestrian and cycle providing connections beyond the site.

The policy has been assessed through the Habitats Regulations Assessment and recommendations in relation to Suitable Alternative Natural Greenspace have been incorporated. The HRA has also considered the potential impacts on water quality in European sites and includes recommendations around ensuring that capacity upgrades are carried out, and this is reflected in the supporting text. Reference to RAMS contributions are included in Policy SCLP10.1 'Biodiversity and Geodiversity'.

The supporting text to the policy refers to the proximity of the AONB, and the policy requires provision of open space and green areas reflecting this location.

A Heritage Impact Assessment has been carried out which has informed revisions to the policy and to the indicative masterplan, to preserve the settings of Listed Buildings surrounding the site.

Upgrades required to water recycling centres have been assessed through the Water Cycle Study.

Criterion (e) has been amended to include reference to opportunities to access the countryside.

Reference to meeting needs for specialist housing and meeting needs of vulnerable people has been included in criterion (o). The policy contains a requirement for affordable housing.

Recommended text in relation to archaeology has been included. Text in relation to an assessment of minerals has also been added.

The policy includes a requirement for pedestrian and cycle access, and the Infrastructure Delivery Framework refers to provision of sustainable transport measures in Felixstowe. Policy SCLP7.2 refers to the provision of electric charging points.

The policy includes requirements for school and early years provision, with details contained in the Infrastructure Delivery Framework. Requirements for other infrastructure provision are also included, including health and police facilities.

Changes to the supporting text and policy have been made to reflect Anglian Water's comments related to existing water mains and sewers.

Reference to Trimley St Mary Parish Council as a stakeholder has been included in the text.

Felixstowe Town Council's suggested changes to policy criteria have been made.

It is not considered appropriate for the policy to be prescriptive in relation to the detailed masterplan for the site in relation to such matters as internal road layouts, in order to provide flexibility around delivery of the site at the detailed masterplan stage. It is also not considered appropriate for the Local Plan to identify a name for the site beyond its geographical description.

Transport modelling has identified impacts on the road network including the A12 and A14, and the Infrastructure Delivery Framework contains details in relation to measures to address this.

It is not considered appropriate for the Neighbourhood Plan to plan for this level of growth as it forms a key part of the strategy for the District.

Reference to the needs for police facilities has been included in the policy.

The policy includes a requirement for biodiversity networks to be preserved and enhanced.

## Policy SCLP12.4 Port of Felixstowe

Total comments	Support	Object	Observation
7	1	2	4

### Statutory Consultees

Environment Agency request that the Policy requires developers to liaise with the water company early on to confirm whether there is capacity within the existing foul sewer to accommodate proposed development. Policy SCLP12.4 should also include a sentence advising that any necessary upgrades are made ahead of development.

### Parish and Town Councils

Felixstowe Town Council requests that the Local Plan should provide an introductory analysis of the port and logistics business and its regional and national significance to qualify the policies being proposed and to ensure that port expansion is enabled to continue.

### Other organisations

Suffolk Coast and Heaths AONB Unit outline that Policy SCLP12.4 should be amended to identify the need for all future development to be supported by an assessment of potential impacts on the natural beauty and special qualities of the AONB, due to the Port of Felixstowe abutting the AONB boundary.

Anglian Water is supportive of Policy SCLP12.4 which states that future development will require improvements to the foul sewerage network.

### Developers/Landowners

Hutchinson Ports outline that they employ 2,500 people directly with the transport and logistics sector providing over 15,000 jobs in the economic area. The plan sets a sound foundation for the development of the district and supporting economic growth whilst giving due regard to the protection of the natural, built and historic environment. Hutchinson Ports support Policy SCLP12.4 which demonstrates the important economic benefits that are realised. The Council should be aware that:

- The average number of containers per vessel has increased significantly placing greater pressure on container storage areas. As a result additional storage space is being created and further additional land is required through demolishing exiting warehouse stock on port.
- Demand for Roll-on/Roll-off storage and traffic is growing. To meet this demand it is planned to demolish a large but ageing warehouse.
- Office space for employees is spread across the port. New office and employee facilities are planned near Walton Avenue which will free up existing office sites but will further encroach on land for storage and distribution activities.

The plan recognises the importance of the A14 and the rail network, it is vital that the District Council works with stakeholders and other regional partners to lobby for upgrades to deliver the necessary improvements to deliver the plan's economic objectives.

### **Members of the Public**

#### Objection:

Sufficient infrastructure must be a priority before any development takes places.

The Port of Felixstowe already has more than enough unused land in and around the port. Arable land should not be used to benefit businesses and greedy landowners. Rumour has it that the Port of Felixstowe is not interested in land at Innocence Farm and other land is available on the other side of the Orwell Bridge.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

References to improvements to water utilities in Felixstowe included within the Infrastructure Delivery Framework. The policy has been amended to highlight the protected landscape of the AONB in relation to the Port of Felixstowe.

Information about the economic role of the Port of Felixstowe is contained within Chapters 1, 2 and 3 of the Local Plan as these set the context and economic ambitions for the Local Plan. Further reference to the changing requirements of the operations at the Port of Felixstowe as well as opportunities to enhance transport connections has been added to the supporting text for this policy.

Comments in relation to other land requirements are further detailed in the Council's response to site allocation SCLP 12.35, Land at Innocence Farm.

## Policy SCLP12.5 Land at Bridge Road, Felixstowe

Total comments	Support	Object	Observation
3	2	1	0

### Statutory Consultees

Suffolk County Council outline that any proposal which increases vehicle movements at the junction of Bridge Road and Garrison Lane will not be supported by the Highway Authority due to limited visibility for motorists and pedestrians at the junction and footways.

### Parish and Town Councils

Felixstowe Town Council are pleased to note that the policy has been carried forward from the Felixstowe Peninsula Area Action Plan.

### Other organisations

Anglian Water is supportive of the requirement in Policy SCLP12.5 which it states that applications for employment uses on this site will be considered against the confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Limited changes have been made to the supporting text and policy in respect of highway aspects. Other comments received do not necessitate any changes.

## Policy SCLP12.6 Land at Carr Road / Langer Road, Felixstowe

Total comments	Support	Object	Observation
3	2	0	1

### Statutory Consultees

Suffolk County Council outline that any proposal that significantly increases vehicle movements at the junction of Langer Road and Beach Station Road will be required to provide junction capacity improvements.

### Parish and Town Councils

Felixstowe Town Council highlights the long standing aspiration to avoid HGV movements in to the more residential areas of Felixstowe and are pleased to note that the policy has been carried forward from the Felixstowe Peninsula Area Action Plan.

### Other organisations

Anglian Water is supportive of the requirement in Policy SCLP12.6 which states that applications for employment uses on this site will be considered against the confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Limited changes have been made to the supporting text and policy in respect of highway aspects. Other comments received do not necessitate any changes.

## Policy SCLP12.7 Land at Haven Exchange, Felixstowe

Total comments	Support	Object	Observation
4	2	0	2

### Statutory Consultees

Suffolk County Council highlights that additional traffic is unlikely to impact upon the county road network. Consideration should be given to providing sustainable links from the north of the site to residential areas.

### Parish and Town Councils

Felixstowe Town Council is pleased to see the policy has been carried forward from the Areas Acton Plan. Suggest reference in para 12.63 should be made to the recent Lidl supermarket. Felixstowe Town Council also suggest additional wording to Policy SCLP12.7 (e) to read ‘...impact on residential amenity, for example, uses involving HGVs.’

### Other organisations

Anglian Water is supportive of Policy SCLP12.7 as it states that applications for employment uses on this site will be considered against the confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Limited changes have been made to the supporting text and policy in respect of highway aspects. Other comments received do not necessitate any changes as the reference to HGV vehicles is too specific for the policy but is covered in the supporting text.

## Policy SCLP 12.8 Land at Brackebury Sports Centre

Total comments	Support	Object	Observation
41	2	23	16

### Statutory Consultees

Anglian Water outline that upgrades to provide for additional growth are wholly funded through Asset Management Plan. Therefore suggested that the text is amended to remove reference to developer contributions under planning legislation. Anglian Water also suggest that text is amended to relate to foul drainage which appears in other allocation policies for Felixstowe.

Historic England highlight that Grade II Tyndale House is adjacent and has not been identified in the policy or supporting text.

Sport England support this policy, provided the new facilities are provided prior to the loss of existing facility and are of at least the equivalent of those to be lost in terms of quantity, quality and accessibility. There will be a need for the North Felixstowe Garden Neighbourhood to provide indoor and outdoor sport facilities.

Suffolk County Council highlight that a transport assessment is required to assess the cumulative impact of the development traffic in Felixstowe. Pedestrian and cycle links to local amenities are essential to mitigate traffic impact.

Suffolk County Council outline preferred option to establish primary school in Felixstowe Garden Neighbourhood to meet demand for additional school places in Felixstowe.

Suffolk County Council identify that Felixstowe Academy would need to expand on its current site to meet demand arising from growth in Felixstowe and Trimley villages.

### Parish and Town Councils

Felixstowe Town Council generally support the redevelopment of the site, but suggest 'and smaller starter home units' is added to SCLP12.8(a).

### Other organisations

The Felixstowe Society outlines that no development should take place until new facilities are provided in the Garden Neighbourhood. Agree that cycleways, footpaths and play area is to be maintained. But estimate of 80 dwellings is overdevelopment. It is essential that any buildings should retain the spacious nature of the area.

### Developers/Landowners

Policy and allocation are supported through understanding of the site's potential for redevelopment as part of the Garden Neighbourhood proposals. Policy SCLP12.8 will need to allow for flexibility to develop scheme through community engagement and detailed pre-application works. The Council will seek to avoid development ahead of the new leisure centre and the wording of policy should

have a less negative emphasis but instead should require proposed development to demonstrate linkages and phasing in relation to comprehensive leisure provision in Felixstowe.

### **Members of the Public**

#### Support:

Respondents comment that they are in agreement that the existing car park is to be retained.

Respondents comment that cycling and walking connections through the site should be maintained.

Respondents endorse the suggestion that existing green space is retained on the site.

#### Object:

A number of respondents comment that development of 80 dwellings would be too many for the site and out of character with the surrounding area as many are single storey or one and half storey and built at a lower density.

In-fill housing is gradually eradicating the green areas within the centre of the town. These areas need to be protected to support wildlife and encouraging family recreation.

Respondents query moving the existing sports facility from its current location which supports healthy communities by having easy to access health facilities.

Redevelopment of Brackenbury should not take place until the new leisure centre is built.

Respondents comment that the existing sites (Brackenbury and Leisure Centre) should be upgraded.

There is no evidence presented on why the leisure centres are reaching the end of their operational life.

Respondents comment that redevelopment of the leisure facilities is to be welcomed but not at the expense of a valuable meeting place. As the plan progresses opportunity to develop a community centre on this site should be explored.

Respondents object to the loss of leisure facilities when no details about the new sports centre on the outskirts of the town.

Influx of additional motor vehicles would result in the need for new highway infrastructure (roundabout or traffic lights) in High Road East.

Respondents comment that consideration must be given to impacts on traffic.

Respondents object to the redevelopment of this site which would result in loss of wildlife and recreational opportunities such as play areas and French boules on this site.

There is a need for more accommodation for the elderly and affordable housing.

The green areas should be retained. These are important for wildlife. An ecological survey should be carried out.

There should be adequate parking provision.

The Council should sell land at the north of Felixstowe to fund the redevelopment of the leisure centre sites.

It might have been good to communicate closing of Brackenbury with the town.

Observation:

Concern that decisions have been made already and therefore query the purpose of the consultation.

Respondents comment that there should be no development on this site until new leisure facilities have been provided.

The Brackenbury site should be developed before agricultural land.

Respondents comment that there is a large dip area in the southwest corner of the site which will be difficult to develop.

The site should be designated for assisted living for over 55s as the site is well placed for local services and facilities including transport links.

**How these comments have been taken into account in the Final Draft Local Plan:**

Comments from statutory consultees have been added to the supporting text and policy where appropriate. The Final Draft Local Plan includes reference to the surrounding Listed Buildings as well as text amendments to reflect the response from Anglian Water. Information provided by Suffolk County Council added to the supporting text where appropriate and consistent with other policies.

Suggested text additions from Felixstowe Town Council have been added to the policy.

Information about the relocation of sports and leisure facilities in Felixstowe has been added to the Final Draft Plan in other sections, such as in relation to the Felixstowe Garden Neighbourhood. Text with regards to the site becoming available once new facilities have been provided has been retained as this will ensure continued provision of facilities to serve the needs of Felixstowe.

Comments relating to the “inappropriate” reuse of the site have not resulted in amendments to the policy as the Council consider it an appropriate site for development. Should the site become available over the plan period, as a result of the leisure relocation proposals as outlined in the East Suffolk Business Plan the policy provides a positive allocation for the redevelopment of this site.

## Policy SCLP12.9 Sunday Market Site, Sea Road, Felixstowe

Total comments	Support	Object	Observation
10	2	1	7

### Statutory Consultees

Anglian Water recommend that the text is amended to remove reference to developer contributions and replaced by wording relating to foul drainage which appears in other allocation policies for Felixstowe.

Environment Agency are pleased to see policy includes flood risk mitigation measures.

Suffolk County Council suggest additional bullet point is added to the Policy to read “Reduced nearby flood risk by attenuation of water on-site (if infiltration is not feasible)”.

Suffolk County Council reference the minor crossing improvements required under application DC/17/3967/FUL and the preferred option to establish a new primary school in the Garden Neighbourhood. It is also envisaged that Felixstowe Academy will also need to expand on its current site to meet needs arising from growth over the plan period.

### Parish and Town Councils

Felixstowe Town Council pleased to note this policy has been carried forward from Felixstowe Peninsula Area Action Plan. An application for this site has recently been recommended for approval.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Object:

Serious concerns about level of additional traffic and parking the proposed allocation would bring to the area of South Felixstowe.

Car parking is a big issues in this area of town.

#### Observation:

Due to the lack of affordable housing for local young families, the Council should consider making most of affordable housing on this site.

**How these comments have been taken into account in the Final Draft Local Plan:**

Policy and supporting text has been amended to reflect the findings of the Water Cycle Study which addresses the concerns raised by Anglian Water. Comments from Suffolk County Council have been included within the supporting text or policy requirements as appropriate. The planning application for the site is noted, however this does not lead to changes in the Policy.

No further changes highlighted by the consultation responses have required a change to the supporting text or policy.

## Policy SCLP12.10 Land North of Conway Close and Swallow Close, Felixstowe

Total comments	Support	Object	Observation
15	1	4	10

### Statutory Consultees

Anglian Water suggest that the text is amended to remove reference to developer contributions as upgrades to water recycling centres are wholly funded by Anglian Water through Asset Management Plan.

Suffolk Wildlife Trust considers that the policy should include the requirement that any development complements the green infrastructure to be provided as part of the Garden Neighbourhood and helps enhance biodiversity in the area.

Suffolk County Council suggest amending the bullet in respect of footpaths to read 'Creating links to the existing public rights of way network, including upgrading Footpath 8 so as to allow cycling and to provide a circular route.' Suggest removal of linear from paragraph 12.93 Request provision of a transport assessment to consider impact on Gulpher Road and widening of Ferry Road.

Suffolk County Council also highlight need for a new primary school at the Felixstowe Garden Neighbourhood and the proposal for additional school places through the site allocation in Trimley St Martin. It is also envisaged that Felixstowe Academy will also need to expand to meet demand arising from growth over the plan period.

### Parish and Town Councils

Felixstowe Town Council suggest that this policy could be incorporated into the master plan for North Felixstowe Garden Neighbourhood rather than a separate policy.

### Other organisations

Suffolk County Council AONB Team suggest the policy should be amended to identify the need for any future planning application to be supported by an LVIA to assess potential impacts on the natural beauty and special qualities of the AONB and to identify appropriate necessary mitigation measures. A lighting strategy should also be provided as part of any future planning application.

The Felixstowe Society strongly support the restriction that development should not be more than two storeys.

### Developers/Landowners

Generator Optima confirm that the site allocation should be retained for residential development and that it remains the intention to deliver the new homes in the short term. The site meets the requirements of the NPPF in respect of being deliverable and the emerging scheme will be designed in accordance with the policy requirements.

### Members of the Public

Objection:

The area is rapidly becoming over developed and infrastructure is not able to support the new development.

No more housing in this beautiful area.

Traffic congestion on Ferry Road is already bad at times.

There is already a shortage of early years and primary education facilities. There is only one High School in the town.

Respondents raise concern over the loss of footpaths and open space.

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text and policy have been amended to reflect the sites proximity to the Garden Neighbourhood. Consultation responses have highlighted that amendments are required to ensure increased connectivity between the site and the adjacent Garden Neighbourhood.

Changes have been made to the supporting text and policy to reflect the educational impact and requirements associated with development of this site.

No other changes to the supporting text or policy have been considered appropriate within the Final Draft Local Plan as this is an existing site allocation which is being carried forward from the Felixstowe Peninsula Area Action Plan.

## Felixstowe Sea Front

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Observation:

Concerned that car parking has not been addressed here as this is already a major issues on event days and sunny days places greater need for parking which has not been recognised.

The Leisure Centre is a prime position and should not be left empty without purposes.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Limited comments in respect of this section. Demand for car parking at peak times in Felixstowe is identified in others parts of the Final Draft Local Plan. Ensuring the existing Leisure Centre site is not left empty is considered through site specific Policy SCLP12.16 Felixstowe Leisure Centre.

## Policy SCLP12.11 Felixstowe Ferry and Golf Course

Total comments	Support	Object	Observation
5	1	0	4

### Statutory Consultees

Environment Agency broadly support the policy but request reference to proposals for houseboats to fully address sewage disposal. Policy should also be expanded to include any environmental effects rather than being limited to the Special Protection Area.

### Parish and Town Councils

None received

### Other organisations

Felixstowe Town Council support the intention to carry this policy forward from the Felixstowe Peninsula Area Action Plan.

### Developers/Landowners

Felixstowe Ferry Golf Club suggest section should include reference to club house, car parking and pro shop buildings as well as the importance of the club to leisure/tourism/community facilities. Suggest policy be reworded to read “Felixstowe Ferry Golf Club is recognised as an important leisure, community and tourism facility and proposals which significantly improve the club house facilities in order to safeguard the long term future of the golf club will be welcomed where they retain the openness of the golf course.”

### Members of the Public

#### Observation:

Better control over the Bala Cottage planning consent must be exercised.

Policy SCLP12.11 states that “any development proposals need to be sympathetic to the low key activities of the area” but query how this relates to the recent property developments and proposals in this part of Felixstowe.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan includes a policy on houseboats and residential moorings (Policy SCLP5.15) which refers to the need to address sewage disposal.

Policy has been amended to reflect the text suggested by Felixstowe Ferry Golf Club.

No other changes to the supporting text or policy have resulted from the consultation responses received.

## Policy SCLP12.12 Felixstowe Ferry Golf Club to Cobbolds Point

Total comments	Support	Object	Observation
1	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Felixstowe Town Council support the intention to carry this policy forward from the Felixstowe Peninsula Area Action Plan.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No changes are considered necessary as a result of the comments.

## Policy SCLP12.13 Cobbolds Point to Spa Pavilion

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Felixstowe Town Council support the intention to carry this policy forward from the Felixstowe Peninsula Area Action Plan.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No changes are considered necessary as a result of the comments.

## Policy SCLP12.14 Spa Pavilion to Martello Park

Total comments	Support	Object	Observation
5	0	2	3

### Statutory Consultees

None received

### Parish and Town Councils

Felixstowe Town Council outline that if a new leisure centre is to be located elsewhere, it presents a once in a generation opportunity for an ambitious modern and iconic tourist attraction. Felixstowe Town Council strongly urges a policy for the fitting redevelopment of the site as soon as it becomes vacant. Town Council also request a resort focused masterplan for the whole seafront area.

### Other organisations

Felixstowe Society stresses that the Pier Head and Leisure Centre are anchors for tourism and question moving the centre to the Garden Neighbourhood. Including the swimming pool with a leisure centre at the seafront is a great asset to the town and visitors.

### Developers/Landowners

Suffolk Coastal District Council comment that the draft policy recognises opportunity for high quality redevelopment on the seafront with the aim of intensifying tourist activity in this important location. Specifically redevelopment of the leisure centre is critical to the ongoing success of the seafront in attracting tourism. Would be better to have its own specific allocation and policy within the Local Plan which would ensure appropriate design principles and redevelopment goals are framed correctly in policy. Local Plan should also recognise the Council's emerging South Sea Front Visioning works and a more positive emphasis on opportunity for beach huts to be provided in this area.

### Members of the Public

#### Objection:

Concern that the Council is spending large amounts of money moving the leisure centres when they are in locations where visitors expect to find a swimming facility.

Existing site for leisure centre should be maintained and redeveloped as this is the ideal location to provide a tourist attraction for rainy days. The site is also a well established location for the local population.

### How these comments have been taken into account in the Final Draft Local Plan:

Following consultation responses the Final Draft Local Plan includes a site specific policy and

supporting text in relation to the redevelopment of Felixstowe Leisure Centre (Policy SCLP12.16).

The new policy acknowledges the central and prominent location of the existing Leisure Centre and guides redevelopment opportunities that may be realised over the plan period once new leisure facilities are delivered as part of the Felixstowe Garden Neighbourhood.

## Policy SCLP12.15 Martello Park to Landguard

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Felixstowe Town Council supports the carrying forward of this policy from the Felixstowe Peninsula Area Action Plan.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No changes are considered necessary as a result of the comments.

## Policy SCLP12.16 Tourism Accommodation in Felixstowe

Total comments	Support	Object	Observation
3	1	0	2

### Statutory Consultees

Environment Agency note the criteria that existing caravan parks and holiday villages would have to meet in order to further develop. Pleased to see flood mitigation measures are one of these criteria.

RSPB recommend that a requirement for relevant proposals to undergo Habitats Regulations Assessment should be included in this policy.

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No changes are considered necessary as a result of the comments.

## Policy SCLP12.17 Strategy for Communities Surrounding Ipswich

Total comments	Support	Object	Observation
7	0	3	4

### Statutory Consultees

Suffolk county Council comment that paragraph 12.132 identifies the mitigation secured from the Brightwell Lakes development as having a positive impact on traffic. The mitigation secured is only sufficient to meet the national policy test of avoiding severe impacts and therefore reference to 'positive impacts' should be deleted.

### Parish and Town Councils

None received

### Other organisations

The RSPB comment that the requirement in the text for site specific ecological mitigation should be carried forward into Policy SCLP12.17.

### Developers/Landowners

Code Development Planners refer to their comments on paragraph 3.19 and object on the basis that it is inappropriate and inflexible to dismiss new development in the communities neighbouring Ipswich. Infrastructure provided through Brightwell Lakes makes this a sustainable location for more development. The area has been identified in previous plans due to its highly sustainable location close to existing facilities. Paragraph 72 of the NPPF encourages planning authorities to consider larger scale development where well located and designed and supported by necessary infrastructure and facilities. The area around Brightwell Lakes could accommodate further development. Employment growth is dependent in part on proximity of housing and employment land. There should be further intensification and expansion of employment space in the areas to the east of Ipswich. The Sustainability Appraisal fails to consider all reasonable alternatives, it should consider an alternatives of complementing existing and emerging development, making the best use of land and most efficient use of infrastructure. The strategy is not the most sustainable option.

Suffolk Constabulary object on the basis that it may take a number of years to deliver the Brightwell Lakes development, and suitable previously developed sites within Martlesham Heath are available and could be delivered in the interim period. The assumptions about delivery rates for Brightwell Lakes are not realistic, considering paragraph 72 of the NPPF which expects realistic delivery rates to be applied. Land at the Police Headquarters should be allocated. *(Site also promoted under Appendix I)*

Ipswich Town Football Club and the University of Suffolk comment that it is welcomed that the strategy for communities surrounding Ipswich is to maintain healthy and vibrant communities and to provide appropriate community and education facilities. The approach that residential development

will be limited to Brightwell Lakes, sites in settlement boundaries and through Neighbourhood Plans could result in very limited development coming forward in these areas. There are sustainable sites in Rushmere St Andrew. The Sustainability Appraisal should consider options other than 'no policy'. Land at the Ipswich Town Football Club training ground (sites 953 and 1060) should be allocated for housing and sport science / education. *(Site also promoted under Appendix I)*

Kesgrave Covenant object in relation to the reasons why development on the eastern edge of Ipswich is not being pursued. In relation to education capacity, land at Humber Doucy Lane (site 1083) could accommodate a primary school. The site would not blight future options for the Ipswich Northern Route. The site is around 7km from Brightwell Lakes and could therefore come forward at the same time. Allocation of land on the edge of Ipswich would be sustainably located. The transport modelling has shown that even with housing growth at Humber Doucy Lane, there is highways capacity. This approach would accord with the Duty to Cooperate and better reflect the Issues and Options consultation document. *(Site also promoted under Appendix I)*

Woolpit Business Parks Ltd welcome the strategy to maintain healthy and vibrant communities which provide a diverse mixture of residential and employment opportunities. Limiting development to Brightwell Lakes and sites within the Settlement Boundaries, plus small scale allocations and through Neighbourhood Plans could result in very little development coming forward in these areas in the plan period.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The text in paragraph 12.132 of the First Draft Local Plan has been amended to reflect that traffic impacts from Brightwell Lakes are intended to be mitigated, rather than that there would be a positive effect.

Requirements for site specific ecological mitigation are covered in Policy SCLP10.1 and it is not therefore necessary to also incorporate in the area specific policies.

The strategy for this Local Plan remains that the focus is not on the Communities Neighbouring Ipswich, and does plan for large scale growth elsewhere in the District at Saxmundham and Felixstowe. An alternative strategy of focusing more growth on the east Ipswich has been considered.

The Police Headquarters site has been allocated in the Final Draft Local Plan, to provide a positive policy approach to redevelopment of this brownfield site.

The site at Playford Road is not proposed for allocation due to the need to consider the requirement for the housing to come forward which would result in the loss of an area of identified open space.

The land at Humber Doucy Lane has been included as an allocation in order to help to deliver housing within Ipswich Borough during the Plan period.

## Policy SCLP12.18 Brightwell Lakes

Total comments	Support	Object	Observation
10	0	4	6

### Statutory Consultees

Anglian Water support policy SCLP12.18 as it makes clear that improvements to the water supply network and upgrades to the foul sewerage network will be needed. Sewage network improvements should be funded or part funded through developer contributions. Under part (i) it is recommended that Sustainable Drainage Systems are emphasised as the principal method of drainage.

Historic England object on the basis that neither the policy nor the supporting text refer to the scheduled bowl barrows and pill box within the site or the bowl barrows in close proximity to the site.

Ipswich Borough Council comment that Policy SCLP12.18 addresses many comments raised in the Council's response to the outline planning application, however notes that the policy does not refer to the ageing population, the scale of retail provision or limiting the use of the employment site to those uses referred to in Core Strategy policy SP5 (i.e. high tech business cluster).

Suffolk County Council comment that the reserved matters process will need to be in accordance with the agreed principles in the Outline application and that careful design of the internal road layout will be required to respect the site access strategy set out in the traffic modelling supporting the original application.

### Parish and Town Councils

Little Bealings Parish Council is concerned that development at Brightwell Lakes will lead to more use of the Martlesham and Playford Roads. Planning permission should require works to promote other routes and deter rat running through Little Bealings.

### Other organisations

East Suffolk Liberal Democrats comment that they hope the final scheme will be environmentally sensitive towards the wetlands and that appropriate modifications can be made.

### Developers/Landowners

Code Development Planners object and state that the outline planning permission affords a genuine opportunity to deliver an appropriate mix of housing and full range of infrastructure and services. The acceptance of the Northern Quadrant to deliver comprehensive employment development and regeneration is noted and supported. Brightwell Lakes may be a focus for further growth opportunities.

Code Development Planners refer to their comments on paragraph 3.19 and object on the basis that it is inappropriate and inflexible to dismiss new development in the communities neighbouring

Ipswich. Infrastructure provided through Brightwell Lakes makes this a sustainable location for more development. The area has been identified in previous plans due to its highly sustainable location close to existing facilities. Paragraph 72 of the NPPF encourages planning authorities to consider larger scale development where well located and designed and supported by necessary infrastructure and facilities. The area around Brightwell Lakes could accommodate further development. Employment growth is dependent in part on proximity of housing and employment land. There should be further intensification and expansion of employment space in the areas to the east of Ipswich. The SA fails to consider all reasonable alternatives, it should consider an alternatives of complementing existing and emerging development, making the best use of land and most efficient use of infrastructure. The strategy is not the most sustainable option.

### **Members of the Public**

#### Object:

2,000 homes is too many. The A12 will struggle to cope. It could cause delays to the police and other traffic.

Concern over how infrastructure will cope – services are not properly funded. Query where people will work. There should be greater contributions to services and infrastructure.

#### Observation:

The Plan should deliver/require open space enhancements around Martlesham and Foxhall (e.g. the sports field adjacent the Police HQ could be parkland, the Foxhall HWRC, and reinstating the footpath between Martlesham Creek and Waldringfield). Brightwell Lakes does not have any real connections to the existing Martlesham Heath.

### **How these comments have been taken into account in the Final Draft Local Plan:**

Reference to scheduled bowl barrows and pill box have been included in the supporting text.

It is not considered necessary to refer specifically to the scale of retail or employment uses as the appropriate uses are detailed in the policy. Policy SCLP5.8 covers housing mix and homes for the ageing population.

Transport Assessments and monitoring associated with planning applications will identify any issues on the local road network.

Subsequent planning applications will consider impacts on environmental designation as appropriate.

The strategy of the Plan is not to allocate additional development at Brightwell Lakes. The masterplan and outline planning application support delivery of 2,000 dwellings. It is considered that this is a large scale development, and there are opportunities in other parts of the District to deliver large scale development alongside infrastructure improvements. An alternative of 'continuation of

existing approach' has been considered through the Sustainability Appraisal.

The site allocation SCLP12.25 Police Headquarters seeks to provide sports provision for the community.

2,000 dwellings at Brightwell Lakes are already permitted and the Local Plan cannot reconsider that position.

## Policy SCLP12. 19 Land at Felixstowe Road, Nacton

Total comments	Support	Object	Observation
16	1	7	8

### Statutory Consultees

Suffolk County Council comment that they are concerned at the suitability and sustainability of B1/B2 development at this location, given the likely density of employment which would result, the relative distance from residential areas and the unlikelihood of significant sustainable travel (walking and cycling) to this location. Further to the highway related comments in paragraph 12.143, consideration needs to be given to the sustainable links to the site, and whether suitable mitigation can be provided for class B1 and B2 uses. A regular bus service along Felixstowe Road stops relatively close to the site and suitable footways and pedestrian crossings would need to be provided to provide a link to the site. This may also benefit sustainable links to the Crematorium. It is worth noting that the Bus Service does not link to Ipswich station.

Suffolk County Council comment that the site is surrounded by known archaeological sites recorded in the Historic Environment Record, and to the west, cropmarks include a Bronze Age barrow cemetery of at least four barrows, likely associated with the wider group of Scheduled Monuments at Seven Hills. Suffolk County Council have highlighted that an Archaeological Assessment is to be undertaken at an appropriate design stage prior to the granting of outline, technical details or full planning permission to inform viability of schemes, mitigation requirements and conservation in situ of significant remains. The following supporting text should be included: 'The site is surrounded by known archaeological sites recorded in the Historic Environment Record, and to the west, cropmarks include a Bronze Age barrow cemetery of at least four barrows, likely associated with the wider group of Scheduled Monuments at Seven Hills. Suffolk County Council have highlighted that an Archaeological Assessment is to be undertaken at an appropriate design stage prior to the granting of outline, technical details or full planning permission to inform viability of schemes, mitigation requirements and conservation in situ of significant remains.'

Suffolk County Council comment in relation to minerals and waste that there are very little other buildings/development nearby. Access to A14. Assessment of material, to decide if prior extraction or use on site is desirable.

Suffolk County Council AONB Team comment that for consistency the supporting text should be amended to recognise that this site is located within the setting of the AONB. Whilst the site is adjacent to the A14, the land to the south is designated as AONB. As well as the need for Landscape and Visual Impact Assessment, it will be important to consider lighting/ light spillage / impacts from the proposed new business park on the AONB. The policy therefore should be amended to identify the need for a lighting strategy to be provided as part of any future planning proposals for this Business Park. The policy should be amended to include the need for a Design Code as per policy SCLP12.20. The Design Code should set out detailed requirements in terms of scale, massing, materials and lighting etc given the site's sensitivity.

Historic England comment that neither the policy nor the supporting text reference the nearby cluster of scheduled bowl barrows which are part of the Seven Hills barrow cemetery. The policy and supporting text should be amended accordingly.

Ipswich Borough Council has no objection to this allocation in principle. As stated in the policy, it is vital that any transport impacts on the local road network are adequately mitigated and this will be integral to its delivery. It is recommended however that the opportunities to enhance and link into the existing Public Rights of Way network are 'required' as opposed to 'encouraged'.

### **Parish and Town Councils**

Levington & Stratton Hall Parish Council object because they fully support a clear separation between Felixstowe and Ipswich and any development, no matter how large or small, can be taken as a phase towards creating an unwanted urbanisation of this valued and agriculturally productive rural separation of the towns. In the absence of any overarching strategic planning forecast, it constitutes the first phase urbanisation of joining Ipswich with Felixstowe. Any development is in contradiction to SCLP10.4: Settlement Coalescence. SCLP10.4: Settlement Coalescence is clear in that it will only allow development 'where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements'. Development between Ipswich and Felixstowe then they would be in contravention of this policy.

### **Other organisations**

None received

### **Developers/Landowners**

Church Manor Estates support the detailed requirements set out in the Policy. The test in the second paragraph relating to 'impact on the A12/A14 junction' should set out and reflect that in National Policy, i.e. that 'The access arrangements should not have an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe' (see paragraph 109 of the NPPF). It is not appropriate to refer to particular agencies 'being satisfied'. The above test is that which they need to adopt.

There is no reason why B8 uses would not be capable of contributing to a 'high quality, attractive environment'. Planning applications will be assessed against the explicit requirement for this to be a 'high quality' business park. There is a significant identified requirement for general and smaller scale B8 distribution space set by the assessment for Suffolk Coastal area of 24,380m<sup>2</sup> (Table 3.6).

Provision of complimentary uses should relate to those that are 'functionally related to the site and the area' rather than 'serving the ancillary needs of the site'. That would be far too restrictive and likely to frustrate market interest from desirable facilities. There is no reason why these would not be capable of contributing to a 'high quality, attractive environment'.

We fully concur with the analysis that has been set out in the Draft Strategic Housing and Employment Land Availability Assessment.

Brightwell Lakes decision and Highways England's accept that further improvements can be facilitated at the A12/A14 junction.

### **Members of the Public**

#### Object:

The scale of the site will put pressure on an infrastructure that is already struggling. Roads, sewerage systems, water supply, schools, healthcare are already at capacity. Address wider infrastructure issues that are potential barriers to future development first.

The old A45 Felixstowe Road is used as a stack area when the Orwell Bridge is closed and bad weather causes Port disruptions and is also an emergency route during closure of A14. This would need to be considered, especially as the plan states that the entrance to the business park would be via Felixstowe Road. Traffic lights would not stop the build up which backs up onto the A14 east and west bound every day, which is dangerous to all road users. Given the congestion already seen at the A12/A14 junction in addition, there are more appropriate places to direct this kind of speculative development to than this site. Detail and outcome of traffic measures for the surrounding junctions, particularly if traffic lights were to be proposed, should be provided.

Concern over impact on nearby residents, increased traffic, noise, air and light pollution.

The site is at the edge of the designated AONB.

The old A45 Felixstowe Road is the gateway into the village of Levington and an industrialised area will have a negative impact. An industrialised area opposite the Crematorium would not be sympathetic to the surroundings. No amount of landscaping could conceal the employment development.

Concern is raised over loss of agricultural land.

Concern over ribbon development and coalescence between Felixstowe and Ipswich contrary to the Council's planning policies protecting from settlement coalescence.

Following the recent closure of the Eastern Enterprise Hub, data regarding the requirement and likely uptake of start-up units would be useful.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text has been added that the Council will be supportive of future opportunities to realise public transport and cycling improvements between this part of the District and Ipswich Town Centre / Railway Station.

The site allocation is compatible with the coalescence policy in that they are part of the planned approach to reconcile growth and environmental protection in the District. It is considered that the development would not lead to the coalescence of Felixstowe and Ipswich as there remains a distinct gap between the two settlements. The policy also includes landscaping requirements.

Policy and supporting text have been reworded to address archaeology, landscape, AONB and differentiation of the nature of the new employment area compared to nearby employment areas.

Text has been added to require assessment of mineral resources prior to development.

The policy requires opportunities to improve Seven Hills junction to be explored. It is not necessary for the allocation to provide details of access to the site as this would be considered at the planning application stage, however Suffolk County Council have been consulted.

Reference is included to proposals outside of B8 being supported where these serve the needs of the Business Park.

Infrastructure requirements have been considered, in particular in relation to the road network. It is not necessary to consider schools in relation to the employment uses.

The policy reflects the site's location on the edge of the AONB and requires development to be appropriate to this location. A requirement for a lighting strategy has been included in the policy.

The development would not take the form of an industrial development, the policy refers to a high quality Business Park.

Loss of agricultural land has been considered, however in a rural District there are limited opportunities for brownfield development.

The development reflects the outputs of the ELNA in terms of growth on the A14 corridor, however at the Local Plan stage details of specific requirements for start up units are not necessary to inform the policy.

## Policy SCLP12.20 Ransomes, Nacton Heath

Total comments	Support	Object	Observation
8	3	0	5

### Statutory Consultees

Anglian Water is supportive of the policy as it states that development will be expected to accord with the confirmation of adequate capacity in the foul sewage network or to upgrade to create the required capacity.

Historic England comment that whilst the Seven Hills barrow cemetery is referenced in the supporting text it is not included within the policy for this.

Suffolk County Council comment that the supporting text should include the following 'Archaeological trenched evaluation is required prior to detailed applications for the eastern area.'

Suffolk County Council comment that they note and support the Environment Agency's comments that the site may require remediation. It is likely that surface water will be contaminated and will need to be treated prior to infiltration. This should be undertaken at the strategic rather than plot by plot level. The following text should be added 'h) a site-wide surface water management strategy'.

Suffolk County Council comment that reference should be made to Highway Authority responses to DC/17/4257/OUT highlighting concerns related to sustainable access to the site. A planning condition for the provision of a continuous footway link on Felixstowe Road linking the local residential areas to the site was recommended.

### Parish and Town Councils

Levington and Stratton Hall Parish Council support the policy.

### Other organisations

Suffolk County Council AONB Team comment that the policy should be amended to include a requirement for a Landscape and Visual Impact Assessment to be submitted with any future planning applications. Bullet point (a) should be amended to state 'Minimising impact on the landscape including the nationally designated Area of Outstanding Natural Beauty through the use of appropriate mitigation measures.' The design code referenced in bullet point (d) should also include information on lighting and materials given the site's sensitivity.

### Developers/Landowners

*None received*

### Members of the Public

Support:

Seems to be an appropriate use of the area. Developers could be required to invest in the AONB close by (through management or infrastructure).

**How these comments have been taken into account in the Final Draft Local Plan:**

A requirement for archaeological assessment has been included in the policy, and the text suggested by Suffolk County Council added into the supporting text.

Reference to a site wide surface water management strategy has been included in the Policy.

Reference to landscape considerations being informed through a Landscape and Visual Impact Assessment has been included in criterion (a). Reference has also been added to mitigation measures and lighting.

A requirement for developers to invest in the AONB could only be ensured if it was necessary and directly related to the development.

## Policy SCLP12.21 Recreation and Open Space in Rushmere

Total comments	Support	Object	Observation
3	1	0	2

### Statutory Consultees

Suffolk County Council comment that any new recreation proposal in this location that generates a significant amount of traffic movements should provide a Transport Assessment. Cumulative traffic impact of this proposal and Ipswich Garden Suburb should be considered.

### Parish and Town Councils

None received

### Other organisations

Sport England support the principle of protecting this land for sport and recreational use although would not object to small scale loss of the non-sporting land south of Playford Road if this enabled investment into the existing sports facilities within the remainder of this site.

### Developers/Landowners

Ipswich Town Football Club and the University of Suffolk comment that there has been no assessment of whether the land still performs the purpose as originally intended as well as 'no policy' an alternative approach could be the removal of limited parts of the open space that no longer meet the objectives of the policy. Land to the east of Playford Road is privately owned so is not accessible to the public. This part of the site has not been used for over 25 years. It is incapable of forming part of a playing pitch or other ancillary use. Sport England have agreed the site does not provide any sport and recreation use. The site is promoted for residential use alongside sports and education uses on land to the west of Playford Road.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Any new recreation proposals would also be considered against SCLP7.1 Sustainable Transport.

It is considered that the policy remains appropriate in preventing the coalescence of Ipswich and the village of Rushmere, whilst supporting continued sports use of the land. It is considered that the area as a whole meets the objective of the policy.

## Policy SCLP12.22 Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park)

Total comments	Support	Object	Observation
4	1	1	2

### Statutory Consultees

Suffolk County Council comment that the proposal provides a positive highway impact by improving sustainable links and reducing the need for vehicular trips for recreational purposes.

### Parish and Town Councils

Westerfield Parish Council support Policy SCLP12.22.

### Other organisations

Suffolk Wildlife Trust comment that in addition to the requirements identified in the policy, the areas of land identified should also contribute to the overall ecological enhancements to be provided as part of the Country Park.

### Developers/Landowners

None received

### Members of the Public

#### Object:

The site should be used as additional gardens for local residents.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy reflects the requirements for the country park as identified through the Appropriate Assessment process and through the masterplanning of the Ipswich Garden Suburb.

The use of the land as additional gardens for local residents would not help to meet the requirements for a country park as identified through the Appropriate Assessment.

## Policy SCLP12.23 Strategy for Aldeburgh

Total comments	Support	Object	Observation
10	2	2	6

### Statutory Consultees

Historic England express their support for para 12.169 and stated that such paras should be consistently found across all settlements. They also suggested including reference to enhancement, where possible in bullet point (a) of SCLP12.23.

The Environment Agency express their support for Policy SCLP12.23, in that, it sufficiently considers flood risk and notes the limited opportunity for future development due to the threat of flood risk.

Suffolk County Council consider that the expansion of existing settings in Aldeburgh will account for the expected demand for early years places emanating from proposed development in the town. Early years education covers children aged 2-5 years old and is generally provided by the market. At present, eligible two year olds and all three and four year olds are eligible for 15 hours free provision per week. In addition, since September 2017, the three- and four- year old children of working parents are eligible for an additional 15 hours free provision (a total of 30 hours).

### Parish and Town Councils

Aldeburgh Town Council positively acknowledge Policy SCLP12.23 as it attempts to protect and enhance tourism and cultural activities. However, they feel this should be balanced with a concerted effort to retain and encourage alternative employment. On the contrary, Aldeburgh Town Council object to the fact that this policy does not address the issues associated with a number of large projects in the vicinity of Aldeburgh.

### Other organisations

MS Oakes highlighted the concept of Objectively Assessed Housing Need in the context of Aldeburgh where house prices rank it third among house price increases in seaside towns nationally. MS Oakes refers to the historical under supply of both market and affordable housing as a cause of this. In this respect, MS Oakes states that without new housing being brought forward average house prices in the town would exceed one million pounds based on increases seen over the previous ten years. MS Oakes states that the current housing supply of Aldeburgh only includes six affordable dwellings that can be prioritised for local people and those linked with Aldeburgh. This should be changed to facilitate younger people moving to the area who do not have a link or connection to Aldeburgh.

The Aldeburgh Society feels that Aldeburgh should not be classed as a market town but as a Destination Town as it possesses characteristics that are distinct to the other market towns in the District. They are pleased to see a collaborative approach to major developments happening in the wider area in respect of protecting the AONB. They also agree that affordable housing and housing for an aging population are the main needs for the town. They are supportive of policy relating to parking, pedestrian access and safety, and maintaining the attractiveness and viability of the

shopping area. In relation to Policy SCLP12.23, the Society supports the thrust of the policy but requests that the statement relating to the Garret Era Area be strengthened to include no lesser protection than that afforded by the former policy AP125 and that this Area will shortly be designated as a Conservation Area as is currently envisaged. They also request the inclusion of additional policy statements relating to the safeguarding of the public views from the Terrace and the Town Steps and future directions for the towns beach. In a separate response, they express their wishes for policies SSP2, 3, 28, 31, 32 and 41 of the Site Allocations Document to be carried forward.

### **Developers/Landowners**

Armstrong Rigg Planning on behalf of Aldeburgh Golf Club suggested that the Local Plan fails to accord with the requirements of the NPPF as it does not allocate a sufficient number of sites under 1 hectare. It is also noted that the level of housing delivery proposed for Aldeburgh is far lower than the other market towns in the District. They have also additionally put forward site (ref 1158 - see Appendix I).

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

Established employment areas in Aldeburgh are not of a sufficient scale for specific allocation but policy SCLP4.4 protects existing employment premises. There are very limited available and suitable sites in the Strategic Housing and Employment Land Availability Assessment within and adjoining the built up area of Aldeburgh for consideration for allocation in the Final Draft Local Plan. However, the Final Draft Local Plan provides a comprehensive set of policies to facilitate appropriate development opportunities including small sites to come forward within the settlement boundary of Aldeburgh having regard to its special environment. The spatial strategy focuses strategic housing growth at Felixstowe and Saxmundham.

The requirement in the NPPF relates to 10% of housing requirement to be delivered on sites of one hectare or less. Considering existing permissions and allocations, alongside allocations made through the new Local Plan, in excess of 10% of the housing requirement would be delivered on sites of one hectare or more.

Final Draft Local Plan policies recognise the particularly significant tourism context to Aldeburgh. The market town classification is inextricably linked to the settlement hierarchy that reflects the scale and level of services in different tiers of the hierarchy. Felixstowe is the only town in the District to be singled out at a different tier in the hierarchy due to its relative scale. The Final Draft Local Plan recognises that the market towns in the District are different and distinctive. The tourism policies emphasise the varying destination aspects of the towns.

In the absence of specific suggestions as to the content and wording of the policy, the approach to the Garrett Era area is considered sufficient. Policies in the Built Environment section of the Plan relate to Conservation Areas and distinct / historic built environments.

## Policy SCLP12.24 Land to the rear of Rose Hill, Saxmundham Road, Aldeburgh

Total comments	Support	Object	Observation
21	2	12	7

### Statutory Consultees

Anglian Water suggest reference is made to foul drainage as part of Policy SCLP12.24 similar to the policy requirement which appears for the allocation policies for Felixstowe.

The Suffolk Wildlife Trust recommend that Policy SCLP12.24 secures adequate ecological mitigation, compensation and/or enhancement measures for all designated sites and protected and/or Priority species, not just bats. They also recommend that the site be subject to an ecological audit, prior to the site being allocated, to determine its existing ecological value and to inform its suitability for allocation for development.

Suffolk County Council note that this allocation is located in a Source Protection Zone and treatment of surface water for pollutants prior to disposal is vital. This may require larger areas to be dedicated for Sustainable Drainage Systems than standard.

Suffolk County Council, in a separate response, commented that the existing access track to the site would need to be widened and upgraded to comply with DMRB visibility splays and provide adequate pedestrian provision, including vulnerable road users. In doing so, consideration needs to be given to existing pedestrian crossing and vehicle movements and ensuring that a 'crossroads' is not formed by moving the access any closer to the Golf club access, which may result in conflicting turning movements at each access.

Suffolk County Council acknowledge that this allocation would result in Aldeburgh Primary School being overcapacity. However, given the level of growth proposed, they do not intend to object to this allocation. Regarding secondary schools, they indicated that there is capacity to accept the pupils emanating from this allocation.

### Parish and Town Councils

*None received*

### Other organisations

The RSPB support of the site allocation while stating their desire for a project level Habitats Regulations Assessment to be required, in light of the proximity to the Alde-Ore Estuary SPA, and the subsequent mitigation measures to be implemented.

David Forestier-Walker Landscape Design raise a number of objections to this proposed allocations relating to:

- The proposed access point for the site.
- The development is not in keeping with the surrounding area.

- Site density. 5 no. dwellings would be more suitable than 10.
- The location is not appropriate for a care home as residents cannot walk to any shops or amenities due to the lack of appropriate pedestrian infrastructure.
- Residential amenity of surrounding dwellings would be affected.

An accompanying study (undertaken by GH Bullard & Associates LLP) is provided to justify the objections.

Aldeburgh Society express their support for Policy SCLP12.24.

### **Developers/Landowners**

Aldeburgh Golf Club supports Policy SCLP12.24. They suggested some amendments to para 12.171 to accurately reflect the Golf Club's current position. They have also additionally put forward site (ref 1158 - see Appendix I).

### **Members of the Public**

#### Objection:

Aldeburgh Golf Club have not confirmed that they would be willing to facilitate the widening of the proposed access route.

The Brickworks site would be more suitable for a development of 10 dwellings and a care home.

The required improvements to the highway and junction are not achievable according to a Highways Consultant report.

Respondents comment that development would reduce property values of neighbouring dwellings.

Respondents comment that development would be detrimental to residential amenity of neighbouring dwellings.

A number of respondents comment that the access point is very hazardous due to lack of visibility and would be exacerbated by increased traffic movements. An alternative access onto Saxmundham Road should be identified as opposed to the proposed access via the existing access track along the western boundary.

Respondents comment that a care home should be within walking and mobility distance of the town centre. This location is on the outskirts of the town. There are more appropriate locations for a care home in Aldeburgh that are located nearer to the town for residents shopping, transport, mobility travel, partaking in the community.

Respondents comment that the number of dwellings and the size of care home suggested seems inappropriate based on the size of surrounding plots. The number of dwellings should be 5 with no care home facilities.

A number of respondents comment that the proposed development is not in keeping with the surrounding area (AONB). This would severely urbanise the countryside at the entrance to Aldeburgh.

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text to the policy addresses sustainable drainage and groundwater source protection. The policy includes specific ecology criteria specifically in respect of bats and nearby protected habitats sites.

Policy criteria wording is included in relation to the existing access track, new access and junction arrangements.

The supporting Strategic Housing and Employment Land availability Assessment does not identify alternative deliverable and suitable sites for a care home in the town.

The strategy for Aldeburgh and this policy / supporting text recognise and reconcile the special environmental sensitivity of Aldeburgh including its Area of Outstanding Natural Beauty setting with appropriate development to address needs and enable some growth / evolution of the town.

Impact on value of nearby properties is not a matter that the Local Plan can consider.

The policy has been subject to Appropriate Assessment and the policy and supporting text include Habitats Regulation Assessment requirements.

Priority Species are addressed in the biodiversity policies rather than certain site allocation policies.

## Strategy for Framlingham

Total comments	Support	Object	Observation
25	1	16	8

### Statutory Consultees

None received

### Parish and Town Councils

Hacheston Parish Council support a significant increase in infrastructure.

Framlingham Town Council support the Neighbourhood Plan as the mechanism for delivering residential development. Important to maintain the proposed number of 50 new houses in the plan period, in view of the delivery of a large number of new homes outside the local plan and neighbourhood plan. The resulting lack of infrastructure to catch up with the need of local development. Regret past loss of business sites to residential use and support policy approaches around the protection of employment sites. Suggest promoting increased availability of bus services in rural areas to provide transport to and from major towns and transport links both for work and Friday/ Saturday evening leisure.

### Other organisations

None received

### Developers/Landowners

Andrew Martin Planning object to the lack of a specific policy in this section notwithstanding the Neighbourhood Plan due to the NPPF requirement to for the Local Plan to set out the Strategic Approach. This should be a positive and ambitious policy and set out Framlingham's future housing requirements and other infrastructure needs. This should also reference the allocation of Manor Farm as a key site which will contribute to meeting this overarching policy and increased housing requirement. Object to the very limited amount of growth proposed over and above the Neighbourhood Plan which pre-dates current housing needs evidence. It is proposed that the Local Plan makes a Strategic allocation at Manor Farm as significant investment in Framlingham, increasing the social infrastructure through additional education and community provision, new tourism and employment opportunities through the cultural provision. The proposals include a spine road through the site, connecting the B1119 in the north of the site to the B1116 in the south.

*(Comments also logged under Appendix I)*

M Scott Properties state that Neighbourhood Plan policies for community facilities are not being delivered in planning permissions. Specialist older persons housing needs are insufficiently addressed in the Neighbourhood Plan. A large allocation is needed to provide infrastructure growth lacking in recent housing growth in the town.

### Members of the Public

**Support:**

Paragraph 12.184 states that Framlingham is directed to have 5% of the growth over the planned period, query if this is a mistake as 5% of 3,560 equals 178 not 50.

**How these comments have been taken into account in the Final Draft Local Plan:**

The growth strategy for Framlingham reflects significant recent growth of the market town, its scale, infrastructure and transport connections.

The majority of site allocations for new housing in the Final Draft Local Plan specifically require an element of the housing mix to cater for the needs of older households. Housing products to meet diverse care and housing needs of older households may be within use class C3 'housing' rather than C2 care home and be either market or affordable housing. Therefore the Final Draft Local Plan approach is not to identify sites specifically for specialist housing. A future review of the Framlingham neighbourhood plan presents opportunity to engage on specialist housing provision in this part of the District.

Table 3.3 'Spatial distribution of housing growth to be planned for' updates the level housing growth for Framlingham.

## Strategy for Leiston

Total comments	Support	Object	Observation
7	0	2	5

### Statutory Consultees

Suffolk County Council AONB Team comment that for consistency the supporting text should reference that Leiston is located within the setting of the Suffolk Coast and Heaths AONB.

Natural England - These allocations will require an assessment of the impacts on landscape and designated sites, including project-level Habitats Regulations Assessment. Design and landscaping including greenspace and Net Gain, should take account of the location in or the setting of, the protected landscape.

### Parish and Town Councils

Leiston Town Clerk comment that there is no mention of a rail link to be provided between Saxmundham and Leiston. With 2,000 homes or more being planned for the area no mention has been made of the increased pressure this would add to the evacuation plan for Sizewell.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Comments received focus on matters around Sizewell including increased pressure on the evacuation plan from housing growth in the town. The Local Plan appears to support Sizewell C despite it being an intrusion into the Heritage Coast and AONB, the potential damage to coastal process / flood risk and the original concept being that it would be operational by 2025.

The town has many useful facilities and can just about absorb the proposed growth, but not without further consideration for school places, doctors surgery etc and in the long term for sustainability a Railway Station. There must also be a caveat about the existence of a Nuclear Emergency Plan to accommodate the amount of growth expected.

Concern about significant social housing need not being met, the need for more smaller units, the affordability of homes and reconciling pressure on the local private rented sector with accommodating Sizewell workers and social impacts of Houses of Multiple Occupation (HMOs). Any development in Leiston should be primarily for local identified need for social housing using Leiston as a hub.

Consider how to promote improvements to marginalised and neglected residential caught up in the midst of all the proposed developments.

The town has many useful facilities and can just about absorb the proposed growth, but not without further consideration for school places, doctors surgery etc and in the long term for sustainability a Railway Station. There must also be a caveat about the existence of a Nuclear Emergency Plan to accommodate the amount of growth expected.

The existing track and signalling presents opportunity to re-introduce passenger rail service to the town. The Plan should support upgrading of the East Suffolk Line and improvements to bus service provision for Leiston.

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text has been amended to reflect the Area of Outstanding Natural Beauty.

All policies in the Final Draft Local Plan are subject to Habitats Regulation Assessment.

Addition has been made to the supporting text to reflect the potential presented by the presence of the rail track bed and signalling.

Matters around Sizewell Nuclear Power Station are addressed under Major Energy Infrastructure in the spatial strategy section of the Plan.

The Infrastructure Delivery Framework sets out the infrastructure required to support the growth outlined in the plan.

The housing section of the Final Draft Local Plan contains a policy in relation to HMOs and affordable housing policies that reconcile addressing housing need with viability / delivery of new homes consistent with national planning policy.

## Policy SCLP12.25 Strategy for Saxmundham

Total comments	Support	Object	Observation
25	1	16	8

### Statutory Consultees

Historic England support the commitment to protecting and enhancing the historic core of the town, but state the South Saxmundham Garden Neighbourhood will have an impact on the historic environment of the town.

Suffolk County Council state that an additional 117 places for early years education will be required as a result of future development in the Saxmundham area. The county suggest provision should be made available at the new primary school as part of the South Saxmundham Garden Neighbourhood. Further provision may be needed in addition, which the County will consider alongside expansion of existing provision.

### Parish and Town Councils

Saxmundham Town Council welcome future growth of the town but emphasise the need for growth to respect local character and heritage, bring social and economic benefits, provide appropriate infrastructure (particularly health services, drainage, sewerage, waste water, and other utilities), respect neighbouring settlements in maintaining settlement identity. However, the Town Council believe the proposed level of growth for Saxmundham over the plan period is disproportionate and not justified. In this regard, the Town Council propose an alternative arrangement whereby the South Saxmundham Garden Neighbourhood site is split over two locations, land to the west of the railway line and land further east up Church Hill. It is emphasised that housing should aim to support all groups in the community, with particular need to provide for young people and older people with this reflected in the type, tenure and affordability of provided housing. It is proposed that greater emphasis should be placed on encouraging proposals to demonstrate that garden city principles are a core feature of acceptable development of the site. The Town Council concludes with support for the strategy for Saxmundham but that further work is needed for support of South Saxmundham Garden Neighbourhood to be realised.

Friston Parish Council note issues in Saxmundham that need to be resolved. These include car parking, capacity of medical facilities, potential impact from Sizewell C and capacity of education facilities. The Parish Council urge that these issues are discussed at preliminary planning process.

### Other organisations

Suffolk Wildlife Trust recommend greater emphasis is placed on the natural environment in the policy wording, particularly including criteria that biodiversity in and around Saxmundham will be both protected and enhanced through the plan period. The Trust also recommends the site allocation South Saxmundham Garden Neighbourhood is subject to an ecological audit before it is allocated, and that no significant adverse ecological impacts are identified.

**Developers/Landowners**

Suffolk Constabulary suggest adding the following criteria to the policy after criterion f) 'Provide for a safe and inclusive community'.

Pigeon Capital Management 2 Ltd support the policy in principle and understand the relevance of the historic core of Saxmundham. They state the proposed South Saxmundham Garden Neighbourhood will help deliver the objectives of the strategy for the town.

**Members of the Public**Object:

Development around Saxmundham will ruin the scenic beauty.

Development around the town will destroy wildlife and their habitats.

The proposed level of development will be detrimental to Saxmundham's local character.

Respondents comment on the need for adequate infrastructure improvements. Emphasis should be placed on infrastructure being built before the other aspects of development that put pressure on the capacity of infrastructure (e.g. roads, medical facilities). Emphasis should be placed on the necessary improvements to the railway line and railway station.

Respondents comment on pressure on schools and the need for a new primary school.

Respondents comment that emphasis should be placed on the need to expand the medical facilities in the town due to capacity constraints and pressure on dentists.

Respondents comment on traffic issues at the crossroads, roads at capacity and that increased traffic from the 800 homes of SCLP12.26 will not enhance the vitality and vibrancy of the town centre.

Respondents comment that sewers are at capacity and that there are drainage issues.

Respondents comments that there is limited car parking in the town.

Respondents comment that the bus service is limited and the railway needs improvements to capacity.

Increased housing delivery is not going to impact market affordability, there are not enough smaller bedroom houses in the town and there is no need for housing locally.

A member of the public supports Saxmundham Town Council's response to consultation.

Too much development is proposed in Saxmundham over the plan period.

Objection to the description of Saxmundham as a thriving town as it lacks community facilities, has no pubs, has no sports facilities, and will gain no investment from the District Council.

Observation:

Employment opportunities should be encouraged in Saxmundham to encourage younger people moving to the area and hence a relative reduction in older residents. Employment allocation should be located next to the railway line to benefit from environmentally sustainable goods transport.

The pressure on Saxmundham facilities (doctor, shops, railway) come from further afield than the outer boundaries of the town, and result in the town being choked with parked cars.

Suggestion for the use of land behind The Queens Head for additional car parking.

Development of Garden Neighbourhood should not proceed without financial assurances for infrastructure. Improvements to the train station and passenger rail capacity would be beneficial.

A roundabout on the A12 would be the safest option.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Additional policy text has been included in regard to the biodiversity value of the areas surrounding the town and that biodiversity be protected and enhanced over the plan period.

The provision of a safe and inclusive community has been included in the policy text.

The policy text has been amended to highlight the ambition of the strategy to enhance Saxmundham's ability to meet the needs of all residents. There is also a role for the Neighbourhood Plan in meeting these aims.

Reference has been made to the importance of Saxmundham railway station as a sustainable transport mode, the protection and enhancement of which is encouraged.

The policy notes the proposed level of growth in Saxmundham over the plan period will be required to provide appropriate infrastructure, employment opportunities, and community facilities alongside the housing to support the town as a key location along the A12 corridor.

Representations referencing the South Saxmundham Garden Neighbourhood have been addressed in the South Saxmundham Garden Neighbourhood site allocation policy. The impacts of growth on the crossroads have been considered through the transport modelling, and mitigation is referenced in the Infrastructure Delivery Framework.

## Policy SCLP12.26 South of Saxmundham Garden Neighbourhood

Total comments	Support	Object	Observation
252	6	219	27

### Statutory Consultees

Anglian Water Services Limited suggest that the following are required in the policy in order to enable development on the site; the inclusion of reinforcements to the foul sewerage network, incorporate Sustainable Drainage Systems to reduce the risk of surface water and sewer flooding.

Historic England object on the basis that the undeveloped nature of the setting of the South Entrance to the Saxmundham Conservation Area, views over the Church of St John the Baptist (Grade I listed), and over Hurts Hall (Grade II listed) is integral to the experience of these heritage assets. Views South West, South, and South East from South Entrance are important features of the Saxmundham Conservation Area Appraisal, and contribute to the important open spaces to the South of the town. The tree lined nature of the southern boundary of the town acts as a soft demarcation between town and countryside. It is noted that these issues are detailed in the supporting text, however they should also be included in the policy itself. A heritage impact assessment should be included as a requirement in the policy to identify if development would be suitable and any impacts and mitigation measures.

Suffolk County Council support the inclusion of policy criteria designed to resolve the need for specialist housing for the elderly. However, they suggest the policy should also include reference to the specialist needs of vulnerable people in addition to that of older and younger people.

Suffolk County Council suggest additional supporting text detailing the archaeological potential of the area and recommend that a proportionate archaeological assessment be required in the policy. They also suggest the requirement that a Flood Risk Assessment consider the impact on receptors off site, due to the size of the development and the location of the site within a Source Protection Zone.

Suffolk County Council state the site is occupied by 8ha of Kesgrave formation sand and gravel, mostly along the eastern edge, and recommend the policy include an assessment of material to decide if use on site is desirable.

Regarding transport impacts, the County Council raise a number of considerations; multiple landowners should work together to provide the most sustainable transport solution, provision of a junction on the A12, no viable vehicular access into the residential land to the north, significant pedestrian and cycle permeability should be provided, further detailed transport modelling particularly regarding the capacity of Chantry Road (B1121/B1119) junction will be required via a Transport Assessment, connectivity arrangements between the two areas either side of the railway line with engagement with Network Rail, and crossing the railway line will be required for pedestrians and cyclists. The County Council welcome the opportunity to continue working with the District Council.

The expected generation of primary school age children will require the provision of a new primary school on site, a 210 place (one from of entry) school, with potential for future expansion. Additionally, the expected secondary school age pupils generated from the proposed allocation can be accommodated within the two available secondary schools, without the need to expand the schools.

Natural England state there is a need for an assessment of impacts on landscape and designated sites, including a project level Habitats Regulation Assessment. Design and landscaping of the site should take account of the location in and the setting of protected landscapes.

### **Parish and Town Councils**

Darsham Parish Council object to the policy as it is deemed the South Saxmundham Garden Neighbourhood would constrain a potential Sizewell C relief road, and consequently other routes will become more favourable, including along the B1122.

Theberton and Eastbridge Parish Council comment that the southern end of the South Saxmundham Garden Neighbourhood should remain open to the possibility of providing the potential D2 route in line with Sizewell C proposals, given the questionable feasibility for improvement along the B1122. The Parish Council also suggested the site could contribute to the Sizewell C workforce housing, bringing infrastructure benefits that would be funded by EDF and with the possibility for legacy development after the construction of Sizewell C.

Benhall and Sternfield Parish Council do not oppose the delivery of housing in Saxmundham, but seeks to ensure the delivery does not damage the local character of Benhall. The gap between Saxmundham and Benhall is of particular concern and is a key factor in the rural village character of Benhall. The proposed site allocation should identify an area of land between the development and Benhall that remains an open space in nature to provide certainty in relation to the matter of coalescence, it is suggested this is an area of 150m in size. The Parish Council is open to the possibility of development west of the A12 to be located further south if the significant open space is provided for to the east of the railway line.

Saxmundham Town Council are supportive of growth in the town. However, they raise a number of concerns relating to the proposed allocation. These concerns are that the proposed allocation of 800 dwellings is disproportionate to the size of the town, the site and particularly the Layers provide a valuable public walking area for residents of Saxmundham and Benhall and also act as an important aspect of the setting of Hurts Hall and South Entrance and a location of ecological interest, concern of coalescence between Saxmundham and Benhall and the subsequent lose of settlement identity, concern that the necessity for a vehicular bridge over the railway line will not be viable or result in loss of other provisions, the capacity constraints of the local road network and local healthcare provision.

### **Other organisations**

The RSPB state that the Habitats Regulations Assessment and contributions to the Recreational Avoidance and Mitigation Strategy should be explicitly included within the policy, in line with recommendations from the Habitats Regulations Assessment Screening Report. They also expect a requirement for Sustainable Drainage Systems provision on the site. They support the requirement

to preserve and enhance biodiversity networks and integrate green infrastructure throughout the site. Additionally, they recommended encouraging measures to enhance the biodiversity within the housing areas of the site.

Suffolk Constabulary suggest adding 'police facilities' to the second sentence of paragraph 12.205. An additional criterion in the policy was also suggested, 'j) Appropriate community safety and cohesion facilities provision.'

The Suffolk Preservation Society comment that the scale of proposed housing growth would have a detrimental impact on the character, landscape, and heritage of the town. It is suggested that development should remain to the west of the railway line. The master planned approach is supported; it is believed an emphasis should be placed on avoiding coalescence between Saxmundham and Benhall. The Society also raise the importance of the Saxmundham Conservation Area and, particularly the Southern Entrance to the town and views over Hurts Hall, which it is believed should be given greater focus in the policy or the supporting text. The Society also suggested restricting the site to the west of the railway line, in conjunction with other sites in the town.

Westover Landscape Ltd strongly encourage greater attention to detail in identifying areas of landscape importance that must be retained, and in identifying other areas of woodland and green spaces required to be provided to mitigate impacts from development, particularly the areas bounding the A12 and the railway line.

The Saxmundham Local History Society state their desire to see the Layers remain an area for the people of Saxmundham to walk through freely and emphasised its historic significance in relation to livestock markets, the Suffolk Show, and military use during both WWI and WWII.

Hollins Architects, Surveyors and Planning Consultants object to the employment allocation as part of the South Saxmundham site allocation, and promote an alternative employment site of 1.85ha with an indicated gross internal floor space of approximately 7,400 SqM, which is part of the existing Carlton Park Allocation (Policy SCLP12.32). Hollins states the site could comprise B1, B2, and B8 employment uses, and also that development into the Locally Listed Historic Park and Garden of Carlton Park, Kelsale, would create no heritage and landscape impact due to an inspector's ruling on adjoining land that 'The industrial estate and residential encroachment on the north park edge have erased all parkland elements and character in those parts, but they are not included in the boundary of the listing' (APP/J3530/W/14/2221769).

Department for Education support the Garden Neighbourhood proposals which would deliver a primary school with early years provision. The Department for Education also support the masterplanned approach to delivering the scheme.

Saxmundham Museum objects to the proposed site allocation due to the historic importance of the Layers. The land has been used for a number of cultural and military events; a space to bring livestock before market, camping ground for the 6<sup>th</sup> Suffolk Cyclists during WWI, testing and encampment of the 9<sup>th</sup> Armoured Division in WWII (which Churchill, Montgomery, and Eisenhower visited before the D-Day landings). The Layers is irreplaceable to Saxmundham as it is part of the history and story of Saxmundham, which is why it must be preserved for future generations.

Suffolk Wildlife Trust support the premise behind garden neighbourhoods, but emphasise the need to ensure existing ecological value of areas is assessed and informs the allocation of uses on the land. The Suffolk Wildlife Trust particularly support criteria b) and e) and detail that these criteria should be the foundation of any development proposal on the land and that proposals should deliver significant environmental gain.

Therese Coffey, Member of Parliament, objects to the proposed site allocation and questions the suitability of development on The Layers. Concern is also raised regarding capacity constraints of existing infrastructure. The response suggests an alternative strategy of development north east of the town centre to rebalance the centre of gravity around the town centre.

East Suffolk Liberal Democrats object to the proposed allocation for a number of reasons. These being; the development is disproportionate to the size of Saxmundham, the proposal will not integrate well with the existing town, degradation of environmental and historic significance of areas of the site, capacity constraints of highways and utilities infrastructure, a perception that infrastructure will not be provided alongside the residential and employment uses, and concerns over coalescence with neighbouring Benhall and the loss of settlement identity.

Leave The Layers Alone (LTLA) object to the proposed allocation and suggest the site is materially unsound as it is not justified or effective. Their response is supported by a number of technical studies. It is considered that the decisions regarding the suitability of sites was conducted prior to consideration of all the available evidence as the transport modelling and Settlement Sensitivity Assessment were not uploaded to the Council's website at the beginning of the First Draft Local Plan Consultation. LTLA intend to take up a legal challenge to the Sustainability Appraisal as it is considered that alternative sites have not been considered in light of the available evidence. Having been supported by a BVA Viability Assessment, the LTLA campaign considers the South Saxmundham site unviable, primarily because of the significant access infrastructure that would be necessary of a development across a railway line. The LTLA also raise concerns about the accuracy of the Strategic Housing and Employment Land Availability Assessment conclusions for sites 1012, 714, and 717, and that they do not consider the evidence in the Settlement Sensitivity Assessment and Landscape Character Assessment. It is considered the allocation does not give enough importance to the Layers as a historic and community feature used by many Saxmundham and Benhall residents. The LTLA conclude that alternative sites would not cause the same adverse effects that it is considered would be apparent on the South Saxmundham Garden Neighbourhood.

### **Developers/Landowners**

The owners of Hurts Hall are concerned the doubt regarding many aspects of the master planned development leave much uncertainty as to the capability of infrastructure provisions needed and the viability of these provisions. Until such a time as these issues have been understood and can be fully and viably justified, it is advised the site should not be allocated.

Pigeon Capital Management 2 Ltd support the proposed site allocation and emphasise the collaborative approach which will be taken with the Local Planning Authority and key stakeholders to help deliver a sustainable education and employment led scheme. Accordingly, in order to demonstrate that the various technical matters can be fully addressed, a number of technical studies have accompanied the comment, which will be addressed as part of a planning application.

Regarding 'dementia friendly environments', further detail as to how this feature would impact design and layout is sought. Site 715 is proposed for green infrastructure in order to maintain a separation between the communities of Saxmundham and Benhall, the railway line further acts as a boundary between the two settlements. The Concept Masterplan, contained within the Delivery Statement, details the mix of uses that will help create a sustainable community, including the provision of a primary school with early years, employment opportunities, retail, and other services and facilities within walking distance of the proposed housing. The proposal, however, suggests altering the proposed site allocation in the First Draft Local Plan to maintain the agricultural land east of the railway line enhancing the area with strategic landscaping and locating some of the employment units west of the A12. This shift to the West of the railway line has been sought in order to reflect the desire to protect the key heritage assets of South Entrance, Hurts Hall, the Layers and St John's Church.

Hopkins Homes Ltd promote land to the west of the B1121 for the provision of residential development, a 2.2ha serviced site for a primary school as well as a proportional contribution to its construction costs with the remainder met by other development as it comes forward, with associated public open space and landscaping. A suite of technical documents is submitted, including; highways, landscape, ecology, heritage, archaeology, trees, and flood risk, and it is stated that these 'robustly demonstrate that it forms a suitable and deliverable housing site devoid of any insurmountable constraints.' The EIA Screening and Environmental Statement, produced in 2017, confirmed that the sites proximity to designated heritage assets and the scale and prominence of development would have significant effects on the historic environment and an EIA was required. Greater certainty is sought from SCDC in determining the extent of the southern boundary of the site. Armstrong Rigg Planning also proposed alteration to the policy wording to enable Hopkins Homes Ltd to build 200 of their 225 homes before the school is to be constructed and to be phased before land to the west of Hopkins land.

Roger Skinner submits a Heritage Impact Assessment, which considers the impact of three development scenarios. These being; the proposed site allocation, sites 559 and 435, and an expanded site 435 (all of owner's land). The Assessment advocates for the development of the expanded site 435. The Impact Assessment concludes the proposed site allocation would substantially alter the setting of Hurts Hall... and thus the building's significance, and would cause considerable harm to the setting, significance and character and appearance of Saxmundham Conservation Area, would cause significant adverse effects on the Grade II\* listed St John's Church, would change the character of the Layers, would cause significant harm to Benhall Stores and the setting of the cluster of listed buildings at Kiln Lane. For these reasons the Heritage Assessment concludes that the proposed site allocation would cause unacceptable harm in terms of national policy. The Assessment also concludes that development of Site 435 and the enlarged area of site 435 would cause minor, non-significant harm to Wood Farm house and possibly very minor harm to Buxlow Manor and would be far more preferable than the proposed allocation. In this regard, the assessment states the proposed allocation should not be progressed in the eastern part of the proposed allocation.

## **Members of the Public**

### Support:

A number of respondents understand / support the need for housing but comment that the need is for smaller / affordable houses, the number of houses is too many for Saxmundham and the infrastructure needs to be delivered with the housing.

Positive support for greater emphasis on significant open spaces and green infrastructure between and around development.

Primary school provision is welcomed.

Objection:

A large number of respondents comment that the proposals will destroy the landscape and reduce public access to the natural environment.

The Layers closest to the River Fromus should be protected from development.

It will destroy private view.

A large number of respondents comment that development would have a detrimental impact on the biodiversity of the area.

A large number of respondents comment that development would reduce the much needed agricultural land.

Respondents comment that development of impermeable surfaces will increase flood risk.

A large number of respondents comment that this represents too much development for Saxmundham.

Query where the need for 800 new dwellings comes from other than a Government target.

A large number of respondents comment on the Impact on historic environment including that the development would negatively impact local character, the historic setting of the Southern Entrance will be lost, there would be an impact on the historic asset of 'The Layers', views of Hurts Hall and the church should be protected, increased traffic will damage the listed and non-listed buildings in South Entrance through ground tremors x4, and development will negatively impact local character of Benhall.

A large number of respondents raise concern over noise, light and air pollution. Development far from employment opportunities will only increase daily car journeys and hence carbon footprints.

A large number of respondents comment that there is insufficient infrastructure, including that adequate infrastructure will not be provided, that infrastructure should be phased early in the development of the site, that 800 homes will not be enough to fund the bridge, road, and primary school [a minimum of 950 homes will be needed], opposition to railway crossing due to perceived limited benefits and significant cost, a railway bridge will make the scheme unviable, housing provided in Saxmundham has not delivered the desired infrastructure in the past, the railway crossing is essential to the sustainability of a community that covers both sides of the railway line, concerns that the site with significant infrastructure requirements will not be viable.

A large number of respondents raise concerns regarding increase in traffic Increased traffic including huge traffic build up around Waitrose and Tesco junction, regularly waiting 20mins to cross the signalised junction in the town, suggested constraint on the A12 at Stratford St Andrew, high street should be pedestrianised, A12 is too busy, a direct access onto the A12 will result in significant congestion, A12 junction into Saxmundham is dangerous and has caused many accidents, significant road improvements are needed, it will overload the B1121 between Benhall and Saxmundham and increased traffic will cause greater speeding.

Vehicular access north into Saxmundham is not possible and so is bolted on development.

A number of respondents comment that there is limited car parking including for the supermarkets and the station.

A number of respondents comment that public transport is limited.

A large number of respondents raise concern over health care provision in particular that there is there is pressure on health facilities, with specific comments including that this needs to be provided for on site, development must incorporate provision for an extension to the Saxmundham Health Practice, car parking at the doctors surgery is limited, concern over the inability to attract staff, suggested need for dentist, pharmacy is under pressure, takes long time to get an appointment at the dentist, new doctors surgery is unlikely to get the necessary funding, adequate health facility capacity must be demonstrated existing or to be provided should any development go ahead.

Emergency services will need greater support due to increase in population.

A large number of respondents raise concerns in relation to education provision and that this is much needed with specific comments including that this as been ignored, suggestion that a new primary school is not needed unless the proposed development is built [and hence more support is suggested for other infrastructure provisions on site], suggestion that the school will not be built but simply space for the school to be provided on the site, adequate education capacity must be demonstrated existing or to be provided should any development go ahead, and query who will fund the school.

A number of respondents query whether there are jobs in the town to cope with the increase in population, there are limited employment opportunities nearby, employment allocation will not materialise as is the case the historic site in the town and employment allocation needs must not be diminished or removed down the line.

Respondents comment that the site has potential to be used for short term Sizewell C workers and then be converted to residential use after construction of Sizewell C, sufficient space should be left between Saxmundham and Benhall for a potential D2 route and if Sizewell C goes ahead housing to the East of Saxmundham would be beneficial and alleviate traffic issues.

Respondents comment that open space/green infrastructure has been ignored, there is a lack of green space on proposed site, loss of open space, lack of open space/green space in the town and green space and trees should be placed to the west of the B1121 to screen any development.

As this is to be a 'garden neighbourhood' query what will the minimum garden sizes be, lower densities and increased open space is commendable and leads to a reduced mental health and stress and the plan should provide greater detail in regard to the garden city principles that will be applied.

A number of respondents comment in relation to community facilities, include that there are limited facilities and amenities, this has been ignored, there pressure on community facilities, community facilities should be conditioned into any development, there pressure on the library facilities, there are not enough facilities for young people, there are limited leisure facilities [swimming/fitness/indoor sports centre], there are not enough facilities on the High Street, developments provide facilities [play ground] for young children but not for older children, The Layers is used as an amenity space and would be lost and there are not enough recreational facilities.

Respondents comment that there is not enough retail provision on the high street to cater for the increase in housing, query how the development will help enhance the vitality and vibrancy of the town centre, the town centre cannot be altered and increases in the population of the town haven't improved the retail offer.

Respondents comment that large scale development will reduce the appeal of the area to tourists.

A large number of respondents raise concern over utilities including that this has been ignored, water supply is being pressurised, sewage disposal is being pressurised, sewerage system can't cope at present, water supply can't cope at present, pressure on drainage, gas will be put under pressure, electricity will be put under pressure and broadband will be put under pressure.

Concern is raised over flood risk.

Respondents raise concern over impact on property values.

Respondents raise issues over police services, including a suggestion for a police station in the town due to increased population and hence a suggested increase in crime, development will result in an increase in crime, there is a need for greater police infrastructure in the town, crime is increasing in the town and police station is closed.

Respondents raise concern that homes would be bought as second homes. Second homes (what's to stop the new houses being bought as second homes. Issue of housing mix / affordability of housing / provision for the elderly.

Respondents raise concern that development would have a detrimental impact on the public rights of way, a suggestion that bridleways should be included in policy requirements to encourage a countryside feeling and enable horse riding, there should be safe cycling infrastructure separate from the motor traffic is needed in order to promote healthy lifestyles and pedestrian and cycle access into the town centre should be a priority.

A large number of respondent raise concern over coalescence between Saxmundham and Benhall.

A number of respondents comment in relation to housing mix and state that more certainty should be displayed as to the required housing mix on the site [by stating the percentage of housing for young and elderly people], it should be ensured that the housing mix/tenure etc is built to meet the

needs of local people, minimum space standards should be guaranteed, the proposed housing is not reflective of local housing need, a significant proportion of affordable and 1 and 2 bed properties should be provided, not enough affordable housing has been provided in the draft plan, there is not enough detail about the affordable housing requirement on the site, there is no/limited housing need in Saxmundham, in order for 800+ houses to be built the densities will be similar to city centre locations.

A large number of respondents suggest an alternative strategy including to spread the growth over a number of potential sites, spread growth over more settlements, housing growth should be located near to places of work, utilise brownfield land before greenfield land, growth should be to the north or east of Saxmundham, growth should develop along the east-west axis, housing should be located to the east of the town, use the existing large brownfield sites of RAF Woodbridge and Rock Barracks, suggestion for a garden neighbourhood at Woodbridge, due to previous growth in Saxmundham development should go elsewhere, residential development should be promoted in town centre locations at higher densities in order to revitalise town centres, utilise a number of smaller brownfield sites, utilise infill development within settlement boundary, no housing to the east of the railway line [this would negate the cost of a road bridge over the railway line, and would help maintain the strong break between town and countryside] and part development west of railway line and part to the East of town.

Query what guarantees are there that developers will not wriggle out of requirements and what guarantee will there be that the development will be any better than other recent developments in the town.

Respondents suggest that the proposed site allocations do not provide enough detail or certainty to make a fully informed comment to the consultation and there is no viability information with which to judge the potential benefits that could be realistically provided on the site.

Policy does not provide enough certainty that infrastructure will be required by development rather than expected.

Respondents support the Saxmundham Town Council response.

Respondents objecting but with no further text.

Observation:

It is a necessity for the vehicular access over the bridge, not merely an expectation. The suggestion is that this route should be a spine road to potentially become part of a proposed D2 route.

Policy does not provide enough certainty that infrastructure will be required by development rather than expected.

Loss of agricultural land.

Respondents comment on Increased traffic, including at the supermarket junction.

Respondents comment on the need for doctor's surgery.

There is no need for a new school, expansion of existing schools will suffice.

Suggestion for a requirement of numbers of trees to be planted and the maintenance of these trees.

Concern over impact on the historic asset of 'the Layers'.

There is inadequate water supply and pressure on drainage.

A new community centre is needed.

Development outside the settlement boundary is contrary to the settlement boundary policy.

Concern over coalescence.

Support for a pedestrian high street and/or restricting vehicles over a certain size/weight in the high street.

Railway bridge and primary school will prove unviable.

Concern over impact of construction vehicles at the cross roads.

Brownfield sites should be considered. All land in the town should be assessed.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

In response to comments around impact on heritage assets, a Heritage Impact Assessment has been undertaken. Reflecting the conclusions of this, the allocation has been revised to include reference to the development needing to preserve the setting of heritage assets. The indicative masterplan has been revised to indicate the area in the east of the site comprising of informal / formal open space.

The southern extent of the allocation would ensure that the separation between Saxmundham and Benhall would remain.

Consideration has been given to the alternative option of development of land to the east of Saxmundham, however considering traffic and landscape issues it is considered appropriate to allocate the land to the south. This also enables the Garden Neighbourhood to be delivered in one location.

The scale of the development will enable the provision of infrastructure, in particular the school. The scale of the development should be viewed in the context of District wide housing needs.

Infrastructure requirements are addressed in the supporting text and policy, and details are provided in the Infrastructure Delivery Framework. The policy includes the requirement for a new primary school and early years provision.

Further transport modelling has considered the potential impact on the B1121 / B1119 crossroads, and measures are referred to in the Infrastructure Delivery Framework.

The Habitats Regulations Assessment has informed the requirements relating to Suitable Alternative Natural Greenspace in the policy. A project level HRA will be required. The policy includes reference to preserving and enhancing biodiversity networks.

The policy includes requirements relating to open space provision.

It is not appropriate to require low densities across the site, as the policy seeks to provide a mix of housing. Smaller, higher density, dwellings can be provided within the concept of a Garden Neighbourhood through provision of green spaces.

EDF Energy have not published proposals in relation to a route to the south of Saxmundham. They are due to undertake further consultation early 2019.

The policy contains a requirement for the provision of community facilities. Employment opportunities to the west of the A12 will need to be master planned and delivered as part of the site.

The policy requires a mix of housing to be provided including to meet the needs of older and younger people, and the provision of self build and affordable housing. Reference to housing to meet needs of vulnerable people has been included in the policy. It is not considered appropriate to be more prescriptive in order that there is flexibility to address needs identified through the detailed masterplanning stage.

Reference to the need for archaeological assessment has been included in the policy, and detail included in the supporting text.

Reference to the need to consider minerals has been included in the supporting text.

Reference to police facilities has been included in the supporting text, and a policy criterion has been added to refer to appropriate community safety and cohesion facilities.

Any issues around noise, light and air pollution would be considered under Policy SCLP11.2 Amenity.

The policy includes a requirement for significant pedestrian and cycle connectivity within and beyond the site.

Requirements in relation to the sewerage network have been included in reflection of the conclusions of the Water Cycle Study. The policy requires SuDS to be provided.

Impacts on house prices is not a planning consideration.

The policy requirements have been considered through the whole plan viability assessment.

The alternative employment site promoted is already within an existing Employment Area at Carlton Park.

## Policy SCLP12.27 Land north east of Street Farm, Saxmundham

Total comments	Support	Object	Observation
7	2	0	5

### Statutory Consultees

Anglian Water Services Limited support the policy as it states development on this site will be considered against the confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.

Suffolk County Council suggest Suffolk Coastal District Council should refer to the Highway Authority's comments in application (DC/18/0702/FUL). Suffolk County Council state the additional transport modelling regarding the B1121 High Street, B1119 Church Hill Signalised Junction confirmed the junction can accommodate the additional traffic resulting from the proposed site allocation.

Suffolk County Council comment that the proposed 40 dwellings are likely to generate 10 children of primary school age, which can be accommodated by the provision of a 210 place (one form of entry) school on the South Saxmundham Garden Neighbourhood. The site is likely to generate 7 secondary school age children, which can be accommodated across the two catchment secondary schools without the need for expansion.

### Parish and Town Councils

*None received*

### Other organisations

Suffolk Wildlife Trust observe that the site has potential to support European and/or UK protected and UK Priority Species, which could be adversely impacted by development. The Trust recommends the policy include a requirement for an ecological survey.

### Developers/Landowners

Hopkins Homes Ltd support the site allocation as a sustainable location for approximately 40 dwellings with good access to key services. Furthermore, the full planning application (DC/18/0702/FUL) submitted in February 2018 demonstrates residential led development is deliverable on this site, that enhances all three pillars of sustainability; economic, social, and environmental.

### Members of the Public

None identified

### How these comments have been taken into account in the Final Draft Local Plan:

An additional criterion detailing the need for an ecological survey is not necessary as it is addressed

in Policy SCLP10.1.

Transport modelling conducted by the County Council and WSP, as part of the Local Plan evidence base, have demonstrated the ability of the B1121/B1119 junction in Saxmundham to accommodate the additional traffic resulting from the proposed development growth in conjunction with that of other proposed site allocations.

Education provision for both primary and secondary school aged pupils can be accommodated in the existing secondary school provision and the primary school provision including the 210 place primary school provided as part of the South Saxmundham Garden Neighbourhood.

## Policy SCLP12.28 Strategy for Woodbridge

Total comments	Support	Object	Observation
12	2	5	5

### Statutory Consultees

Suffolk County Council comment that within Woodbridge ward there is a need for early years provision equating to 29 spaces and that there will be a need to expand settings within Woodbridge ward. *(Note that the information has been provided at ward level and relates to allocations in the ward).*

### Parish and Town Councils

None received

### Other organisations

Suffolk County Council AONB Team comment that for consistency the supporting text should reference that Woodbridge is adjacent to the boundary of the Suffolk Coast and Heaths AONB and that the Deben Estuary is a Special Protection Area. Policy SCLP12.28 should be amended to state (h) conserves and enhances the AONB and (i) does not significantly impact on the Deben Estuary SPA.

The Woodbridge Society support the strategy outlined for the town and the recognition that there is very limited scope for any significant development. Support the retention of the A12 as a firm edge to the town. The improvement of links between the town centre and the riverside is supported, and needs to take into account residents, tourists and river users. It will require wide consultation with the residents and the representative bodies in the town.

The River Deben Association object on the basis that measures to protect the Woodbridge and Melton riverside contained in saved policies AP249 and AP250 should be fully incorporated into the Strategy for Woodbridge. If the Council no longer has a policy of land acquisition, the plan should prevent any development on land between the railway line and the river to protect the character of the river.

East Suffolk Liberal Democrats support that retaining the overall character and boundaries of Melton and Woodbridge are respected in the Plan, although have concerns in relation to the design and appropriateness of the Melton Hill development.

### Developers/Landowners

The Seckford Foundation object on the basis that the Plan does not make any new residential allocations in Woodbridge where house prices are higher than in Felixstowe and Saxmundham. Therefore the distribution of housing will not address housing needs in the most unaffordable areas. The Foundation welcomes the acceptance that Woodbridge will need to grow and that land to the west of the A12 should be actively considered, however state that this should not be allowed to

persist for too long given the adverse impact on the vitality and viability of Woodbridge and the affordability of housing. The approach does not reflect the position of Woodbridge in the Settlement Hierarchy or its role in the surrounding area, and is likely to lead to a continued ageing population and increasing house prices. Criterion (b) of the policy should more closely reflect paragraph 12.218 through being reworded as follows:

'b) Retains the A12 as a firm edge to the town, until such time as further work has been completed on the Ipswich Northern Routes, at which point this constraint will be reviewed'

They support the ongoing work of the District Council with other authorities to seek to bring forward a northern relief road around Ipswich. The approach to Woodbridge should be clearly stated as a temporary position.

### **Members of the Public**

#### Object:

Object to development north of Woodbridge on the basis that this would impact on the tourism employment opportunities provided by the AONB, the £1.3m spent on road improvements will impact on the environment in a number of ways and the focus should be on public transport, infrastructure is under pressure and should be provided before housing, additional housing should be provided by Government to deliver affordable homes for the elderly and young.

County Councillor Page endorses paragraph 12.215. Concerned over the likely impact on the town of the potential Ipswich Northern Bypass and to possible future development to the west of the A12. The riverside and town centre complement one another and it is hoped that improving links between the different parts of the town, namely the riverside, means supporting the Woodbridge 20mph and associated calming plan approved by SCC in February 2017.

County Councillor Page endorses the retention, maintenance and protection of parks, open spaces and playing fields in the Woodbridge area.

County Councillor Page endorses paragraph 12.221 'the Local Plan acknowledges the Air Quality Management Area and seeks to direct new development away from this area.' It is unclear how further development can provide mitigation in relation to air quality, further development could only exacerbate the situation.

County Councillor Page comments that paragraph 12.222 is unclear. It is unclear what 'Proposals in riverside locations however, need to be balanced against the principles of visitor management' means. The paragraph needs to be less ambiguous.

County Councillor Page comments that paragraph 12.218 does not adequately describe the limitations of development which seem to be aimed exclusively at the affluent purchaser. Concerned that Policy SCLP12.28 does not acknowledge the imbalance of housing type within the town and the consequent demographic shift over the last two decades. The aspirations in paragraph 5.2 of the plan are welcomed, and the aspirations in the East Suffolk Housing Strategy around pursuing a range of models for housing delivery should be a special priority for Woodbridge. In paragraph 12.219

housing should not be aimed at older people moving into the area but to enable young people, disable people and key workers are not forced to move out of the area.

Observation:

Concerns regarding availability of parking spaces for residents who have no off-street parking. New developments have not had adequate parking provision.

Concern over proposals for the Melton Hill site being too high.

Concerned over the vast amount of housing proposed for north of Woodbridge in an area notably rural. Woodbridge has transport links and may need to take the housing burden.

**How these comments have been taken into account in the Final Draft Local Plan:**

Requirements for early year provision are identified in the Infrastructure Delivery Framework, following further engagement with Suffolk County Council.

Reference to proximity to the AONB has been included in the text.

Reference has been added to the mix of uses that would be appropriate between the railway line and the river.

The allocation for Melton Hill, Policy SCLP12.32, requires a high standard of sustainable design.

The Plan states that through the next review of the Plan it is likely that options would be considered for the Ipswich Northern Route and any associated growth which would provide more of a focus on the area east of Ipswich. Growth to the west of the A12 would need to be considered as part of a Local Plan review rather than a through a criteria in a policy.

Parking standards are required via Policy SCLP7.2.

Proposals for the Melton Hill site, set out in policy SCLP12.32, reflect the NPPF focus on making efficient use of land. It is considered that this location lends itself to higher densities than many other parts of the District which is largely rural.

The Local Plan does not propose any additional growth north of Woodbridge.

It is for Suffolk County Council to propose a 20mph zone in Woodbridge, through the appropriate legislative procedures.

The reference to proposals in riverside locations needing to be balanced with visitor management and the Policy refers to the potential to impact on designated European sites.

Any applications for housing development would be considered against SCLP5.8 Housing Mix and SCLP5.10 Affordable Housing on Residential Sites, which would support a mix of housing being delivered. Policy SCLP12.32 supports smaller houses, which may be suited to young people.

## Policy SCLP12.29 Strategy for the Rural Areas

Total comments	Support	Object	Observation
27	6	10	11

### Statutory Consultees

Historic England comment that they have been unable to review the strategy for the rural areas and the proposed site allocations in detail. They object on the basis that the supporting text and policy for this section is more generic rather than highlighting vernacular architecture. They also note an issue with consistent referencing of the natural, built and historic environment in Policy SCLP12.29.

Suffolk County Council provide details of capacity and requirements in relation to early years provision, at ward level. They state that they have a statutory duty to ensure sufficient provision. The long term effects of changes to the number of hours of free provision are yet to be seen. The County Council wishes to discuss delivery of early years requirements, in particular the potential for allocations of land, in order to ensure that necessary requirements arising from the Plan are delivered.

### Parish and Town Councils

Ufford Parish Council welcome the acknowledgement in paragraph 12.231 relating to capacity at the Melton crossroads, however suggest it could also be acknowledged as a reason for additional development in Ufford and Wickham Market not being suitable.

Westleton Parish Council comment that they support the strategy for the rural areas. The village has a distorted spread of ages due to the number of retirees, 27% of homes being second homes and elevated house prices, and therefore paragraph 12.228 is relevant.

Sudbourne Parish Council support the policy and consider that paragraph 12.230 is a fair summary of the balance between the need for growth and the responsibility for the environment. Policy SCLP12.29 should support development *at the relevant scale* in preserving and promoting the sustainability of smaller villages.

Peasenhall Parish Council object on the basis that the supporting text states that it is important to ensure that rural communities are vibrant yet policies elsewhere in the Plan severely restrict development in Peasenhall. It is well related to infrastructure and only a few miles from the A12.

### Other organisations

FCC Environment support the statement 'opportunities and constraints to further development vary across the rural parts of the District. Those rural areas that are well related to the A12 or to Ipswich present greater opportunities for new development to be well connected to other, larger locations...'. FCC supports Policy SCLP12:29 Strategy for the Rural Areas, in particular 'The vision for

the rural areas is to support and enhance the vitality of rural communities and enhance the visitor experience...’.

Suffolk Wildlife Trust comment that whilst they support the intention of criterion (f) to protect designated habitats and seek to provide biodiversity enhancements, it is recommended that it is extended to include reference to UK Priority habitats, protected species and UK Priority species.

### **Developers/Landowners**

Thorpeness and Aldeburgh Hotels Ltd promote land at site 981 for residential and sports development. *(Note: site also promoted under Appendix I)*

Artisan PPS support the policy in principle but object to the omission of the Crown Nursery site for delivery of mixed uses including employment and housing. The site is a brownfield site and the Plan fails to recognise the existing land use position and the opportunity for sustainable mixed use development. *(Note: site also promoted under Appendix I)*

Radgrade Ltd and The Rendlesham Estate support in principle the approach set out in paragraph 12.230 in relation to Large Villages. Land at site 557, Land at The Mews, Rendlesham would assist in delivering the vision to support and enhance the vitality of rural communities and is promoted for development. *(Note: site also promoted under Appendix I)*

E R Winter and Sons support the policy as it is in line with paragraph 78 of the NPPF.

Woolpit Business Parks Ltd welcome the strategy for the rural areas focusing on sustaining and supporting rural communities. Land at Grove Farm, Little Bealings would support this strategy and is promoted for allocation. *(Note: site also promoted under Appendix I)*

M Scott Properties comment that paragraph 12.230 seeks to increase the mix of housing available for older people, however it is recognised in paragraph 5.63 that it is sites outside settlement boundaries which attract lower values. Specialist housing is unable to compete with market housing. There are a limited number of providers of specialist housing. This approach will lead to an uncertain supply of specialist accommodation and compromise the quality and suitability of properties and care.

The Suffolk Punch Trust support the policy. Land East of Rectory Road, Hollesley (site 567) should be allocated for housing to contribute to the number of small sites identified in accordance with paragraphs 68, 77 and 78 of the NPPF. *(Note: site also promoted under Appendix I)*

### **Members of the Public**

#### Object:

Criterion (c) of the policy – new housing does not help to sustain rural communities. They are sustained through minimum local employment and people able to afford the costs of living away from urban communities.

Criterion (d) of the policy – It is not practical to enhance unspoiled areas without spoiling them

The Plan directs too many houses to small villages, which won't be for local people.

Concern that the A12 will not have capacity to handle the volume of traffic that will arise from development. Train length is limited by platform size. Parking is problematic at all stations between Ipswich and Lowestoft.

Concern over uncertainty of water supply, waste water drainage and sewage treatment. Development should not take place until water cycle studies have been completed.

Objection is raised to the cumulative number of new houses in Saxmundham, Benhall, Kelsale, Westleton and Darsham as it is over development of this part of East Suffolk. Concern over traffic related to development in these locations along with Sizewell C, farm traffic and tourism traffic. Concern over the capacity of the road network in the event of an emergency at Sizewell C.

Infrastructure is needed alongside new housing, including roads, schools, surgeries, public transport, shops, pubs and social amenities.

Sufficient parking is needed with new housing developments.

Concern over impact of new development on the Melton crossroads.

The transport impacts of new development in north east Ipswich and at Brightwell Lakes should be considered across the County.

The need for housing is acknowledged but place, design and use of brownfield sites should be given greater priority.

Concern over cumulative loss of green spaces and the plan does little to address the needs for affordable housing. Alongside Sizewell C, there is too much development too quickly. There is not the infrastructure to cope with rapid growth.

Observation:

The projected increase in dwellings for Marlesford is unsustainable as it is a Conservation Area and does not have infrastructure to support development.

Therese Coffey MP comments that it is surprising that there is not more development proposed around Farnham, Stratford St Andrew, Marlesford and Glemham recognising that the by-pass is coming. Suggests a minimum of 500 houses should be considered here. This would likely bring further and improved infrastructure.

Councillor Christine Block comments that the text does not refer to the lack of public transport or mobile phone signal. Paragraphs 12.228 and 12.230 do not refer to the need for affordable rented accommodation. In Policy SCLP12.29 the concept of enhancing the visitor experience should be

explained. The approach to the number of dwellings proposed / allocations on rural sites appears divorced from evidenced local need / access to facilities / infrastructure.

Exiting Bell Lane (Marlesford) onto the A12 is difficult. Use of the road by large vehicles is also an issue. There is a lack of public transport to Campsea Ashe station. Agree with the comments of Marlesford Parish Council.

The plan should address building of houses which bear no relationship to the existing built environment.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Further reference has been added in to the supporting text in relation to the heritage assets in the rural areas.

Infrastructure provision in rural areas is considered alongside site allocations, with provision / contributions specified where necessary. Further detail is contained in the Infrastructure Delivery Framework.

The Melton crossroads is identified specifically in relation to the Deben peninsula as it provides the main route. Further transport modelling of the junction has indicated that it can accommodate the levels of growth proposed in the Plan. Transport modelling has considered all existing planned development as well as development proposed in the Local Plan.

The scale of development in relation to rural areas is covered in the policies in the Economy and Housing chapters (chapters 4 and 5).

A site allocation has been identified for Peasenhall in the Final Draft Local Plan.

Reference to priority habitats and protected species has been included in the policy.

Alternative sites that were promoted have been considered, the reasons for not selecting sites for allocation is set out in the Strategic Housing and Employment Land Availability Assessment and the Sustainability Appraisal.

No site allocations are proposed in Marlesford, the growth identified relates to permissions.

Whilst the strategy focuses on the A12, there are limitations around site availability some villages close to the A12. Those settlements that are identified as countryside have not been considered for allocations.

Reference to lack of public transport and mobile phone signal have been included in the supporting text.

It is considered that new housing can help to sustain rural communities, and this is consistent with the National Planning Policy Framework which states that houses should be located where they will enhance or maintain the vitality of rural communities. The Settlement Hierarchy has considered the availability of facilities and services in determining those settlements which are defined as Large Villages or Small Villages.

There are limited opportunities to allocate brownfield sites to meet the housing needs of the District.

Parking requirements are covered under Policy SCLP7.2.

## Policy SCLP12.30 Land at Innocence Farm (adjacent to Trimley St Martin and Kirton)

Total comments	Support	Object	Observation
332  Petition also received which was signed by 971 persons.	7	314	11

### Statutory Consultees

Suffolk County Council AONB team state that for consistency the supporting text should reference that Innocence Farm is located within the setting of the Suffolk Coast & Heaths AONB. Given the site's sensitivity and the fact that it is located less than 0.5km away from the boundary of the AONB, the Design Principles referenced should provide guidance on scale if possible, as well as materials and lighting. Amend the 4th paragraph in the policy as follows: New development proposals will be required to implement design principles regarding scale, massing, materials and lighting to reduce the impact of any built form on the nearby communities and surrounding landscape, particularly the setting of the AONB.

Suffolk Wildlife Trust comment that whilst Policy SCLP 12.30 does include reference to the need to development at this site to be assessed under the requirements of the Habitats Regulations, it does not include reference for the need for any other ecological assessment. The proposed allocation site has the potential to support a range of species, including potentially some protected and/or UK Priority species, the site should therefore be subject to an ecological audit prior to allocation. If it is determined that allocation is acceptable the policy should include the requirement for ecological survey and assessment, along with any necessary mitigation, compensation and enhancement measures, as part of any planning application.

EDF Energy supports this allocation and the approach taken to allocating employment land. There is strong support for the approach of recognising short term use of the site and allowing it to revert to its long term use afterwards.

Suffolk County Council comment that:

- Text should make reference to site's setting in the AONB.
- Design guidance should include scale, materials and lighting.
- 4<sup>th</sup> paragraph in policy should read: 'New development proposals will be required to implement design principles regarding scale, massing, materials and lighting to reduce the impact of any built form on the nearby communities and surrounding landscape, particularly the setting of the AONB.'
- Supporting text should include the following "This large site lies in an area of very high archaeological potential, within a broader landscape of cropmark evidence for early activity. On the site itself, there are cropmarks of trackways and a field system which are currently

undated but may be early, as well as boundaries and evidence for settlement. Cropmarks continue to the south and northeast. A complex of ring ditches lies to the northeast. The site has not been subject to systematic archaeological evaluation. Development has the potential to impact on archaeological remains. The site is also the location of a World War II Radar station with a camp to the north, and concrete generator huts are recorded. Suffolk County Council have highlighted that archaeological assessment should be required to the viability of schemes, mitigation requirements and conservation in situ of significant remains” and the Policy should make reference to an archaeological assessment being required.

- As Minerals and Waste authority, Suffolk County Council identify that the section should also include reference to an assessment of material at the site to decide if prior extraction / use on the site is desirable.
- Site of this scale requires an all movements junction to avoid U-turn movements at J58 and J59. Possibility to use the existing Kirton Road if the site was accessed from J59. Improvements needed to the A14 footbridge to allow for cycling from Trimley St Martin. Traffic modelling work shows that a site of this scale would also contribute to the cumulative traffic impacts on the A14 which are significant.

Therese Coffey MP recognises the local concern of this massive development which is not supported by the Port of Felixstowe and is not supported by the MP. It is important to retain a strategic barrier between Felixstowe and Ipswich.

### **Parish and Town Councils**

Felixstowe Town Council acknowledges the impact of Innocence Farm on neighbouring parishes but is broadly in favour of the proposal. However the perimeter of the site should be respectful of its neighbours. The impact of the increase of 600 cars and 3200 HGVs using the site should be taken into account alongside Sizewell C and port expansion. Access is inadequate and the Local Plan should require an underpass to link the A14 to Croft Lane. Failure to do this will result in additional pressure on J59 (Trimley) and J58 (Seven Hills). Kirton Road should be reserved for emergencies only to protect the character of the area, cyclists, pedestrian and school children.

Trimley St Martin Parish Council outline that there is no evidence to show that a site of this size is needed for port related use. Inadequate justification is provided that significant new employment opportunities will arise from the development of the land for port related port related purposes. The Parish Council take issue with the quantitative scoring evaluation that does not distinguish differential weighting to each criteria. Proximity to the port, which is presented elsewhere as a factor of major significance is not one of the characteristics evaluated except insofar as all sites are located between the port and the Orwell Bridge. Whether a site is situated west or east of the A14 seems not to have had any bearing on the score awarded for strategic road access. When assessing site ownership and availability (item h) it appears that 0 or 5 are the only possible scores. Inconsistent site ownership scores to sites with the same landowner availability status.

Property blight going forward for a possible 20 years Impact of the loss of good quality farm land. Note that National Planning policy (para 112) requires that ....'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

Without a clear statement explaining the type of protection which will be put in place, local people cannot have any confidence that their interests will be protected – much more detail is needed before a clear idea of the potential impact can be gleaned and this work needs to be done now. Residents cannot be expected to endure 20 years of uncertainty.

Waldringfield Parish Council concerned regarding SCLP12.30 Land at Innocence Farm. Paragraphs 12.232 – 12.246 contain many marketing buzz words/phrases, but are extremely short on actual facts. It is difficult to imagine that any amount of mitigation could effectively minimise the impact on the area that a 24/7 haulage/warehouse operation of the type and scale of that described in §12.240 will have. The degradation of the environment, air pollution, noise pollution, light pollution, increased traffic movements and visual impact will have significant impact for several miles across the AONB as well as the immediate settlements of the Trimleys and Kirton. ‘Retaining hedgerows and tree planting’ will do nothing to ameliorate these impacts. It is difficult to see how ‘lighting and noise strategies’ could prevent severe impacts on the local communities – bright lights are needed for security and lorries create noise: no amount of ‘strategies’ will change that.

Trimley St Mary Parish Council is concerned that access to the site would only be possible via the eastbound carriageway. Lorries on the westbound carriageway will have to travel to the seven hills roundabout before turning back onto the eastbound carriageway in order to access the site. Traffic from Innocence Farm would have to travel to the Dock Spur roundabout before it could access the westbound carriageway. There is concern that the A14 is not a motorway grade road. This means that a contraflow system cannot be arranged when roadworks are taking place and that traffic will be diverted through Trimley St Mary.

Cross-Boundary Parish Council Innocence Farm Group (Trimley St Martin, Trimley St Mary, Kirton and Falkenham, Levington and Stratton Hall and Bucklesham Parish Councils) comment that the evidence to support the allocation of Innocence Farm is unsound. Supporting studies provide contradictory evidence about the amount of employment land that is actually needed. They also state that port related activity should be located to the east of the Orwell Bridge in order to service next day delivery centres, whereas in fact employment land should be located to the west of Orwell Bridge. This is because distribution centres are more dependent on deliveries from the west of the country rather than the Port of Felixstowe to the east. They would be less vulnerable to Orwell bridge closures if they were located to the west of the bridge.

There are alternative sites on brownfield land which have not yet been developed, which points to a lack of investment. This includes the 13ha Port of Felixstowe Logistics Park, which was granted planning permission four years ago, but which has not yet been developed. Other examples include Anzani House and the Routemaster Hotel. Existing planning permissions for port related use already total 184 ha and this exceeds the demand for port related uses even without the development of Innocence Farm.

The process used to assess different alternative sites for port related development is flawed. Testing six criteria and awarding each of them up to four points is incorrect because it assumes that each criterion is equally important, when this is not the case. The assessment criteria do not include close proximity to the port. There is no assessment of the impact of increased chemical and particulate pollution – despite this issue being raised by Kirton and Falkenham Parish Council. The Sustainability Appraisal is incorrect to positively score the section about improvements to health in view of the

increase of pollution that this proposal would entail. Whether the site is located west or east of the A14 has not had any bearing on the scoring for strategic road access. No account is taken of the significant cost of providing road access to Innocence Farm and it is awarded full marks for road access. Innocence Farm is awarded full marks for site availability but this does not reflect the views of the landowners concerned. There is no evidence of landowner consultation. There is no assessment of infrastructure costs.

The Transport Infrastructure Report contains the following errors and omissions. It fails to mention the impact of increased HGV traffic upon the surrounding area. There is no discussion about the financing of necessary infrastructure improvements. There is no discussion about the estimated additional 3200 HGVs using the site per day, focusing instead on employees' private car use. Transport modelling in Appendix A does not model the impact of allocating the entire site. The assertion that there will be 109 morning arrivals appears inconsistent with the claim that there will be 1081 jobs created at Innocence Farm. No attempt has been made to model the impact of the significant increase in HGV traffic on the surrounding road network. The transport model contradicts the DLP report by stating that traffic for the site should use the existing road network. The DLP report stated that traffic to the existing employment site should be restricted from using the access to Innocence Farm. Innocence Farm is further from the A14 than several alternative sites and would require a lot of new infrastructure to be connected – but this is not mentioned in the report. Proposals to link Innocence Farm to the Felixstowe Branch Line have not been thought through and are unlikely to be viable.

Employment development on this scale is unacceptable in a rural location. Greater detail within the policy is required in order to assess potential impacts.

Levington and Stratton Hall Parish Council have considered this previously and objected as it is industrial sprawl which would advance urbanisation between Felixstowe and Ipswich and create exceptional levels of pollution to the local environment and communities. The Parish Council have considered this site again especially in light of the Lichfield report and the availability of development sites to the west of the Orwell Bridge.

### **Other organisations**

Hutchinson Ports outlines that the Port of Felixstowe is the largest container port in the UK and directly employs 2,500 people with a further 15,000 jobs in the transport and logistics sector across the Ipswich Economic Area. Hutchinson welcome the publication of the First Draft Local Plan and the recognition that the Port is given and identify that new strategic areas for employment use close to the A14 are needed as this will provide opportunity to renew existing stock of business premises which in some parts of the district are not fit for purpose. In developing policies the Council should be aware that:

- Recent rapid increase in container ship size has impacts on land use within the port as the average number of containers per vessel has increased significantly putting pressure on additional storage space being needed.
- Demand for roll-on/roll-off traffic is also growing and to create additional space it is planned to demolish aging large warehouses.

- New employee facility is planned on port land near Walton Avenue which will free up existing office sites in or near operational port land.
- Partnership working is required to lobby for upgrades to the rail network to help deliver the economic objectives.

East Suffolk Liberal Democrats believe that there may be other more suitable business park sites. Amongst the villages there are concerns about noise, traffic, floodlighting, loss of much needed quality farmland and the destruction of the rural nature of the peninsula.

Kirton and Trimley Land grab provided a petition signed by 971 individuals which outlined 'We, the undersigned, are adamantly opposed to Suffolk Coastal District Council's plan to designate prime agricultural land for development purposes, in the Trimley St Martin and Kirton Parishes. From the evidence base, it is clear the case has not been made for sacrificing greenbelt farming land, which is also the home of numerous animal, bird and insect species – some quite rare. We call on the Council to revise their Local Plan and exclude the land designated for housing in Trimley St Martin, as well as the huge acreage designated for unspecified development making up Innocence Farm.'

### **Developers/Landowners**

Trinity College Cambridge fully supports the proposed allocation of land at Innocence Farm for employment use to support the continued viability of the Port of Felixstowe and other associated businesses. The College endorses draft policy SCLP12.30 and is committed to delivering on its requirements. This long-term approach will provide additional flexibility and allow the commercial needs of the Port to be addressed as they arise, substantially enhancing its competitive position.

- Allocating the whole site now will also enable landscaping to be implemented as part of the first phase of development and allow it to mature more fully by the time that subsequent phases are developed
- Opportunities to connect the site to the rail network.
- Suitable access is achievable. There are a number of options available, taking account of the site's location directly adjacent to the A14. These will be progressed in more detail and discussed and agreed with the Highways Authority and Highways England over the coming months.
- Collection and discharge of surface water can be achieved through a combination of soakaways, swales, attenuation and detention/balancing ponds
- Perimeter bunds and landscaping to enclose and screen development from the wider area and provide a generous landscaped buffer to the nearest dwellings and Trimley St Mary Primary School

Savills on behalf of Sarah Mayhew highlight concerns over the scale and location of the Innocence Farm allocation and identify that Walk Farm is of a more suitable scale to address needs but also with fewer sensitive receptors and benefits from improved connections to the A14. The council should retain the position that an allocation is warranted but incorporate site 288 (14.9ha) for this purpose.

Martin Robeson Planning Practice on behalf of Churchmanor Estates outline that there should be criteria or firm requirements in relevant policies to ensure that land released is not lost to other forms of employment use.

### **Suffolk Coastal District Councillors**

Cllr Susan Harvey comments that when measured in miles this site extends to 1 ¼ miles on the A14 and is ½ a mile wide. It would have a major impact on the 33 houses adjoining the site and Roselea Nurseries. We do not want to see industrial coalescence between Felixstowe and Ipswich. The Royal Haskoning Report appears biased toward this site and is of very poor quality. There is not an easy link to the Railway line to this site. This would be a massive investment and would have to go across land outside the ownership of the site. The Nacton site (no9, Seven Hills) scored the same as Innocence Farm and is closer to the A12/A14 junction. Far more central for the purpose. Site 7 and 8 scoring 19 and 18 respectively with 0 under ownership is on the right side of the A14 and has a much closer link to the Railway. Query whether these were serious suggestions. We know who the land is owned by. The Port of Felixstowe says some land is required but nowhere is it suggested to be this big, near 115.6ha.

The Port has land of its own and if it were necessary they would invest themselves and reap the benefit financially. Other sites have been given planning permission but no funding has come forward to enable them to be built. The total areas of land which have been given permission are more than that requested as necessary by the port. With regard to para 12.241 Major Energy Infrastructure support for this would be better located near the A12/14 junction. There is also the remains of the old Trimley Radar station with its underground tunnels and rooms. These historic sites should be protected from any development not lost for ever. I would suggest that this site is not needed, in the wrong place and should be withdrawn from the plan.

Cllr Richard Kerry fully supports the submission by the Parish Councils of Kirton and Falkenham, Trimley St Martin and Trimley St Mary. Whilst it is recognised that some land for port related use should be included in the new plan this site is unacceptable and far exceeds the need described in the plan. With that need in mind planners are asked to look again at sites 8 – 9 & 10 as contained within the Port of Felixstowe Growth & Development Needs Study. These sites appear to be better sited for access to the trunk roads systems and could accommodate any staging point for a major national infrastructure project that may come to fruition.

### **Members of the Public**

#### Need for more land for the Port

The need for more land related to the Port has been highlighted as a concern. Respondents outline the increased use of automation and remote control gantries which is decreasing staff numbers. Extensive rail improvements have also been introduced. There is unused space at Harwich port, which is owned by the same operator, which could be developed further. The site is much larger than that which is needed by the port. It is stated that the port needs 26 Ha for their requirements; Land at Innocence Farm is 116 hectares. Other comments include:

- The number of companies operating from the port has been declining, which questions the need for this allocation.
- The amount of land allocated is greater than what is needed.
- Allocations within other local authority areas means that Innocence Farm is not needed.
- Development should be spread between different district councils so that not only Suffolk Coastal benefits financially.
- Felixstowe relies too much on the port for its employment.
- There needs to be greater emphasis on encouraging high tech employers.
- Operators prefer more centralised locations for warehouses.
- There is a lack of evidence to justify converting agricultural land into employment land.
- Increased automation will reduce port employment leading people to travel further afield to find work.
- The port already has the land it needs to expand.

#### Strategic approach and provision elsewhere along the A14 corridor for logistics development

Suffolk Coastal District Council have demonstrated sufficient joint working other Local Authorities and stakeholders to come to the optimal solution. The Lichfield report 2018 has only looked at 10 sites from Felixstowe to the Orwell Bridge and does not cover suitable areas outside Suffolk Coastal District. The Port of Felixstowe's biggest need is for more distribution warehouse space. The nature of freight is increasingly fast moving so question that containers need to be de-vanned and cargo stored/distributed that close to the Port and this far East. West of the Orwell Bridge sites would mitigate the Orwell Bridge constraints. Blakenham business park - 750,000 sqf warehousing space. Planning permission in place; Orwell Crossing - 65 acres.

A number of respondents state that provision is made in Mid Suffolk and other locations to the west of the Orwell Bridge. The A14 corridor has numerous sites available away from areas of village habitation and more central to UK wide access. Mid Suffolk District Council subsidiary Gateway 14 Ltd has just announced the purchase of land adjacent to the A14 to develop as a logistic park. This is a further developed project which should mean Innocence Lane development should be shelved. Mid Suffolk District Council has purchased land for a similar facility near Stowmarket. The Orwell Crossing has just been approved as a 65 acre logistics park plus the former British Sugar site at Sroughton is going to be transformed into a multi million pound industrial and distribution park.

Duty to cooperate not discharged in terms of demonstration of joint working to appraise best option across districts.

#### Coalescence and strategic planning of growth on the Peninsula

The site allocation is incompatible and inconsistent with the strategic and some topic policies of the First Draft Local Plan as it is against planning policy approach of keeping residential and commercial/industrial developments away from each other. If development is allowed to take place east of the natural boundary of the A14 then it will inevitably lead to the industrialisation of the whole peninsular. The development of this site would urbanise nearly a third of the remaining green field separation between Felixstowe and Ipswich. The proposed developments are going to ruin this village and turn it into a small industrial suburb of Felixstowe. Landscaping will not reduce this coalescence and will not mitigate the impact on the setting of the AONB.

### Cumulative highways impacts

No traffic impact assessment completed with the current level of lorry movements being 3200 HGV's per day. Impacts on minor country roads and road safety. Report in July 2018 ; the A12 is at near capacity. Extra traffic on a dedicated cycle route To Felixstowe. Unsafe reliance on the A14. Impacts on significant commuting in both directions between Felixstowe Peninsula and Ipswich areas. The proposed development would exacerbate the frequency with which the A14 road is blocked, preventing reliable travel to and from the peninsula. Question how the Orwell Bridge and A14 will cope with more traffic, when it is unable to cope at the moment. Delays on the A14, A12 and more often because of accidents and closure of the Orwell Bridge. There has been no traffic impact assessment close to the area of Innocence Farm.

- No further development until the highway network has been improved.
- Development on this site will lead to traffic congestion on the wider road network.
- Increased pressure on Dock Spur and Seven Hills junctions.
- Concern from additional pressure caused by traffic at Martlesham.
- Need for significant investment in the road network.
- The HGV park should be located to the west of Ipswich so that it is not impacted by Orwell bridge closures.
- Orwell bridge is already beyond capacity.
- Development should be distributed among a number of smaller sites so as to lessen traffic impact.
- Traffic modelling does not take account of 3200 extra lorry movements.
- Traffic modelling does not take account of impact on wider transport network
- Development will create road safety issues for pedestrians.
- Concern about road safety issues.
- Concern about access to and from local villages for residents.
- Lack of services for lorry drivers.
- Existing brownfield sites such as the Routemaster Hotel can be used for lorry parking and so there is no need to free up laybys on the A14.
- There has been no analysis of traffic flows.
- Proposed site is susceptible to Orwell Bridge Closures.

### Highways access

Network of roads and junctions not suitable for the extra lorries and cars. It would cause chaos during construction and would be expensive to change and maintain. Other comments raised include:

- This proposed allocation would increase lorry movements. The Felixstowe peninsula can only accommodate one major point of road access. As a result there would be increased issues with road traffic congestion.
- There is currently no road access to the site.
- Cost of road access will be prohibitive.
- No mention of cost of road access onto the A14.

- No consideration given to road access.
- Providing road access via the Trimley Road will impact on school journeys.
- Concern about impact on access to the villages of Kirton and Newbourne.
- Cost of road access is not adequately considered.
- Concern about inadequate road access and resulting road works.
- Innocence Lane and Croft Lane would not be able to cope with the additional traffic.
- Viability of access infrastructure.

#### Viability and uncertainty

Huge investments in the road infrastructure will be needed, with the A14 needing improved slip road access, they are very substandard at present and will have to be widened for the lorries, or brand new accesses to the A14 would be required. The proposals include radical road development which will cost millions of pounds, neither report available states where the finance for these massive changes will come from. Economic strategy should be to diversity the economy not plan for reliance on the Port. It appears that the existing landowner's aim is to land bank this area as a long term investment. The proposal is land banking with a view to later housing development.

#### Scale

There is no evidence presented that unequivocally demonstrates the need for such a large additional development. The site area (115.6 ha) is far greater than the projections outlined in Litchfield's Port of Felixstowe Growth and Development Needs Study July 2018. The site exceeds the predicted requirement for the entire District. Other comments relating to scale included:

- The evidence does not support the allocation of a site of this size.
- This allocation is based on the assumption of continuous economic growth but it is not clear that this will happen. Some but not all of such points mentioned Brexit.
- There are extant planning permissions for port related development that have not yet been built out.
- Development would be better distributed across a number of smaller sites.
- Want to keep this area as a village.

#### Lack of concern / account of the wishes and needs of the local community.

A large number of consultation responses have highlighted that there is a lack of confidence in the consultation process. Many question why there was not more public consultation. Local community has objected to proposals for Innocence Farm during previous consultations but this has not been taken into account.

#### The local area cannot assimilate the development - Noise, vibration damage and other bad neighbour impacts

Any land designated for industrial use which is allowed to operate 24 hrs a day, 7 days a week cannot be placed close to existing and potentially new nearby residential housing without major consequences. It is crucial to understand the environmental impact and damage that this

development will have on the local rural area. Irreversible damage to local greenfield areas, tranquillity, quality of life, businesses and lifestyle.

This development cannot be satisfactorily integrated into the neighbourhood whilst respecting the village and local quality of life. Goes against and fundamental changes the distinctive nature of the area that local people cherish, why they choose to live and like living in Kirton. The whole fabric of villages would change to the detriment of every resident. Other comments include:

- Development should not take place next to residential areas as it provides nothing for the residents.
- Concern about impact on character of local villages.
- Lack of infrastructure to support the proposed development
- Long term property blight / negative effect on house prices.
- Negative impact on tourism in local villages.
- Villages need more time to consolidate recent development before more development is planned.
- The lack of detail surrounding the proposal to create flexibility in fact creates uncertainty for local residents.
- Concern about increase in crime related to transient stranger drivers.

#### Primary School

The existing primary school is currently characterised by a rural and peaceful setting and needs to be protected from business activities which will bring air, noise and light pollution as well as many drivers and passengers who are working at the employment site. Other comments include:

- There is a need for additional capacity at local schools to support the proposed allocation.
- There should be no development on this scale next to a primary school.
- Concern about impact on the primary school .
- Concern about the impact on the setting of the primary school.
- Journeys to school will become more difficult and dangerous.
- Concern that development will take place next to a recreation area.

#### Air pollution

Air pollution from the expected 3500+ HGV movements per day would seriously impact the health and wellbeing of over 1000 local residents, with the development placed in exactly the worst position to spread fumes and dust over the village of Kirton in the prevailing South westerly winds. Diesel fumes.

- Development on this site will lead to an increase in air pollution.
- Air pollution has a negative impact upon people's health.

#### Light pollution, visual and landscape impacts

24 hour operations. Whatever landscaping is provided will not mitigate the increased light pollution to the unspoilt north of this peninsula. The glow from the Port is already significant and should not

be increased in scale or spread. Blot on the landscape for a rural village location. If containers for the ports are going to be stored, looking at other sites in Felixstowe, they can grow very tall to save space, over shadowing any enhancements carried out. The lands adjoining the Deben and Orwell rivers are listed as Areas of Outstanding Natural Beauty (AONB), the proposed development would damage our widely enjoyed natural environment.

- Proposed development will lead to an increase in noise and light pollution.
- Mitigation will fail for example landscaping will fail to offset light noise pollution.
- Development will have a negative landscape impact.

#### Geology, drainage and water conservation

Contaminated ground water run off. Ground water run off from the nearby fields is currently a problem; this will become a major problem when it is contaminated by an industrial area.

- Development on this site will increase the risk of surface water flooding.

#### Biodiversity impacts

Wildlife needs protecting. This large site has loads of wildlife including bats, deer and badgers. Many birds including hawks, tawny and barn owls use the proposed site. There are woods which should be protected for their biodiversity and wildlife value.

- Proposed development will have a negative impact on local wildlife.
- There is an ancient pond at the junction of Innocence Lane and Kirton Road which is historically thought to contain newts.
- Supporting evidence does not adequately consider biodiversity impact.

#### Loss of high quality agricultural land.

Public consultation responses outlined the loss of 300 acres of agricultural land. The agricultural sector in the area is just as important for the production of food which is sold directly into the supermarkets; these fields will be lost forever. The 300 acre farm land site is currently used as farm land and should be retained as such; once the agricultural land is gone it's gone forever. Around 40% of our food comes from Europe; it is essential that we grow most of our food in the UK. We need to increase agricultural land and not reduce it.

- Development on this site would lead to a loss of agricultural land.
- If this site is not developed for employment use there should be a restriction in place for fifty years that prevents it from being developed for housing.
- Development on this site will lead to ribbon development.
- Farmland is necessary to prevent flooding and protect the environment.
- Farmland should be protected and tenant farmers guaranteed a reasonable rent.

#### Sites within and around Felixstowe Dock

68 acre site on Felixstowe dock has still not been transformed after failing to attract investment.

The Port of Felixstowe has ample space in areas between the port and A14, many of which appear derelict, or unused and already commercial developments, which surely would be more suitable both for development and convenient usage. There are many unused wasted space in the Felixstowe Dock area which already is light polluted.

There is sufficient land around Felixstowe Port which has been ‘banked up’ this includes green and brown field sites (some with Planning Permission). Port of Felixstowe already has a brown field site designated for Logistics Park development subject to a lack of market interest. Buildings within the Port nearing the end of their lives should be updated where they are. A new Innocence Land site would lose a green site and leave unused brownfield sites..

### Alternative sites

There are legitimate alternative sites to seriously consider and progress before damaging this location. Other areas off Suffolk well within the reports 10 mile ideal boundary lines, that would have far less impact on local area because it already has permission in place for such a development, not requiring such massive infrastructure developments. A better location closer to the port and rail should be used on the opposite side of the A14. There are much more suitable sites along the A14 away from villages. Other sites in Litchfield’s report would satisfy the projected demand without the devastating negative effect on the landscape and surrounding villages.

There is land available to the west of the A14 Dock Spur Road & Clickett Hill Road that could be used for this container terminal & warehousing development. An alternative site of the container terminal & warehousing would be at the existing Orwell Crossing Lorry Park just off the A14 & close to the Felixstowe to Ipswich railway line. This site would have a reduced environmental impact as there are no housing developments close to the Orwell Crossing Lorry Park. Other comments relating to alternative sites include:

- There are other sites which are preferable to Innocence Farm.
- There has been no consultation with neighbouring local authorities regarding the provision of alternative sites.
- There are alternative sites that have better access to the rail network situated along the A14 corridor.
- The Lichfield’s methodology used to test sites is not scientific. The criteria used are too narrow and the marking system used does not stand up to scrutiny.
- Land within and next to the port should be developed before more remote sites are considered.
- Brownfield land should be developed before greenfield land.
- It is not necessary to use a site close to the port.
- Alternative sites have not been given adequate consideration.

### Rail access

There is no railway line on this side of A14. Other side of A14 i.e. Orwell Crossing or Dock area both have a railway nearby – which would cost a lot less to build and run. The proposed site does not

provide access to the rail network, surely a priority for this type and scale of development would ideally include a rail link in line with Government policy to increase rail transportation.

In the Site Appraisal Matrix no consideration is given to rail access which is understood to be the preferred method of freight transportation. Innocence Farm is the wrong side of both the A14 road and the rail line. More information needs to be collated on how the rail network to the Felixstowe Port can be further increased to allow something like 60 % of the freight to be move by rail.

Little thought for the impact on those who have to live here. The balance of nature is being turned upside down. There is no future consideration for a major push to increase the rail use for containers from its current level to 60%.

- Greater thought should be given to infrastructure provision. This includes consultation with Network Rail and Highways England.
- It is necessary to focus on rail transport rather than road transport.
- Use of this site does not encourage greater use of the rail network.
- Development should encourage greater use of the rail network.
- Need for significant investment in the rail link to the site.
- No consideration given to rail access to the site.
- It will not be possible to establish a rail connection to the site because it is on the opposite side of the A14 to the railway line.
- The site has poor rail links.
- There is currently no rail access to the site.
- The cost of providing rail access will be prohibitive.
- The cost of rail access is not adequately considered.
- Alternative sites have better rail access.
- Allocate for London commuter houses instead & improve rail services

#### Uncertainty around the energy development element of the policy for the site

Point 12.240 is very worrying. A vague unspecified Major Energy Infrastructure could involve many things, of which we are not being informed. Paragraph 12.241 of the local plan suggests that at some point Innocence Farm might be utilised to assist delivery of energy infrastructure and understands this to mean that the site might be considered for freight handling during the construction of Sizewell C. This seems to be an unsuitable use – there must be sites located closer to Sizewell – and suggests that there is a determination to find an employment related application for the site however inappropriate that may be.

#### Other comments

- Healthcare – there should be no new development until healthcare facilities have been improved.
- The sewage system has already failed many times because the old sewers cannot cope with additional development.
- Respondents question the relationship between the District Council and the landowners promoting the site.

- Petition received by 971 signatories objecting to the site.
- Many respondents stated object with no further comments.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The allocation for employment uses at Innocence Farm in the Final Draft Local Plan has been comprehensively rewritten to take into account the consultation responses. The Council still consider the allocation of the site to be appropriate to boost the local economy and ensure that the Port of Felixstowe can maintain its market share. The Port of Felixstowe is Britain's largest port and handles approximately 40% of all containers entering the country. In order to maintain this prominence, the land allocation will ensure that current operations within the haulage and logistics sectors will be supported over the plan period in a positive and comprehensive manner. Although the land is allocated to support the Port of Felixstowe, the activities anticipated on this site are independent of the Port but will provide a variety of services and facilities.

The Council has prepared an evidence base document to demonstrate the need for additional land within the Port, logistics and haulage sectors. The need demonstrated on a macro scale will bring economic benefits to the local area and ensure that activities and economic prosperity can be retained in a location well related to the Port of Felixstowe. The consultation responses highlighted that the evidence was flawed and the need not identified correctly, but the Council considers this to be incorrect as a need is identified in a robust and credible evidence base document.

It is acknowledged that employment land is available across the District in the form of existing allocations and planning permissions. Collectively these opportunities can support the operations of the Port and associated sectors, but their delivery is dependent on numerous landowners and individual aspirations. Land at Innocence Farm provides opportunity for a comprehensive development opportunity to be taken which will support the local economy for the longer term period. Consultation responses identified that the site may reduce the "gap" between Ipswich and Felixstowe. The Council acknowledges that this site will result in development on the A14 corridor between these two towns, but it is not considered that the proposed development will lead to settlement coalescence.

Consultation responses have highlighted the impact any future development may have on the landscape, natural habitats, wildlife and residential amenity. The First Draft Local Plan acknowledged the impacts and outlined that significant landscaping would be required. The Final Draft Local Plan provides further justification as to the landscaping and green infrastructure that will be required to mitigate the impacts of the development. Landscaping on a strategic and comprehensive scale can be delivered in an exemplar manner and bring a variety of community benefits to the area. Ensuring that significant landscaping is incorporated into the policy will also enable residential amenity considerations to be taken into account and any issues overcome through appropriate mitigation measures.

The site has been considered and included within the transport modelling that has been undertaken to support the Final Draft Local Plan. Assumptions have been made as to the volume of movements associated with the site based on potential type of uses anticipated on the site. Following consultation responses, the supporting text has been amended to further clarify the required access arrangements in the western part of the site. The Final Draft Local Plan includes an area of land to the south of the A14 to facilitate access arrangements which can provide easterly and westerly movements from the site. Identifying land in this location also provides an opportunity to access the railway, should a viable solution be identified to link the site to a railway connection. The transport model also places restrictions on HGV traffic and prohibits the use of local roads surrounding the

site. The Final Draft Local Plan also outlines that HGV traffic associated with the site will be prohibited from using the Trimley St Martin junction of the A14 as this is predominately a residential use junction. Opportunities to link to the site to the Public Rights of Way Network and provide cycling links to the site from nearby areas such as Felixstowe Garden Neighbourhood have also been included within the Final Draft Local Plan.

Consultation responses have highlighted the loss of “high quality” agricultural land as a result of this allocation. The Council accepts that this site has potential for farming and therefore if developed would lead to a loss of agricultural land. Information from Natural England shows that the land is “very good” and “good to moderate” which is similar to other parts of the District. The National Planning Policy Framework is clear that the landscape should be preserved where possible unless other benefits outweigh this preservation. Within the search area, the grade of agricultural land is similar and therefore a decision based solely on the quality of the land would be inappropriate.

Responses to the First Draft Local Plan which suggested additional wording in respect of the site character and specifics such as location in close proximity to the AONB and text considering archaeological issues has been included within the Final Draft Local Plan. Alongside this additional text, an indicative master plan has been provided which is considered to broadly reflect the policy requirements and demonstrates a layout that might be achievable. The indicative master plan shows an area of approximately 67ha for employment uses with approximately 50ha provided for landscaping.

## Policy SCLP12.31 Former Airfield Debach

Total comments	Support	Object	Observation
3	1	0	2

### Statutory Consultees

Suffolk County Council comment that any significant increase in traffic generation over the previous use may require mitigation in the form of highway improvements and depending on the use class, provision of sustainable links to the site. Applications should provide a Transport Assessment regarding the above.

### Parish and Town Councils

*None received*

### Other organisations

*None received*

### Developers/Landowners

Debach Enterprises Ltd support the policy and state that the airfield is an established and successful employment site. Carrying forward the allocation will provide confidence to owners, prospective tenants, existing tenants and communities. The policy will allow businesses to adapt and grow. The extended area of land promoted at Issues and Options stage (site 1097) remains available if needed.

### Members of the Public

#### Observation:

Development at Debach Airfield should only take place after the condition of the C309 is resolved from Debach to the junction with the A12 (road is inadequate and junction with A12 is hazardous).

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The policy includes reference to the need for a Transport Statement or Transport Assessment.

## Policy SCLP12.32 Carlton Park, Kelsale

Total comments	Support	Object	Observation
3	0	1	2

### Statutory Consultees

Suffolk County Council recommend the requirement of a Transport Assessment for any proposals that generate a “significant amount of traffic movements from this site”, in order to assess the impacts on the local highways network.

### Parish and Town Councils

Kelsale cum Carlton Parish Council raised concerns regarding the increase in traffic along Carlton Road and at the crossroads in Saxmundham. They specifically commented on the sensitive nature of increased traffic on the Kelsale cum Carlton Primary School along the road including school children crossing the road, should Kelsale Business Park expand further.

### Other organisations

None received

### Developers/Landowners

Hollins Architects, Surveyors and Planning Consultations object to the employment allocation as part of the South Saxmundham site allocation (SCLP12.26), and promote an alternative employment site of 1.85ha with an indicated gross internal floor space of approximately 7,400 SqM, which extends Carlton Park (Policy SCLP12.32) to the west. Hollins states the site could comprise B1, B2, and B8 employment uses, and also that the extension into the Locally Listed Historic Park and Garden of Carlton Park, Kelsale, would create no heritage and landscape impacts due to an inspector’s ruling on adjoining that “The industrial estate and residential encroachment on the north park edge have erased all parkland elements and character in those parts, but they are not included in the boundary of the listing” (APP/J3530/W/14/2221769).

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Included in the policy is a requirement for proposals that generate a significant amount of traffic movements from the site to be accompanied by a Transport Assessment.

It is considered that the inclusion of provision for employment opportunities within the South Saxmundham Garden Neighbourhood is necessary to enhance the sustainability of any proposed development and would not be detrimental to the existing employment allocation at Carlton Park.

## Policy SCLP12.33 Levington Park, Levington

Total comments	Support	Object	Observation
3	0	0	3

### Statutory Consultees

Suffolk County Council comment that consultation with Highways England recommended. Limited access at the A14 junction to the southeast of the site (which is unsuitable for increased use leaving the site to access the A14). Seven Hills junction would need to be used for the majority of movements. Applications should provide a Transport Assessment regarding the above.

### Parish and Town Councils

Levington and Stratton Hall Parish Council welcome the comments in the DLP as this local employment site is an excellent example of businesses working harmoniously and supportively with the local resident community.

### Other organisations

RSPB comment that the requirement in the text for Habitats Regulations Assessment should be carried through into the policy.

Suffolk County Council AONB Team comment that the policy should be amended to identify the need for an Landscape and Visual Impact Assessment as the site lies within the setting of the AONB. The LVIA should also inform any landscape strategy needed as well as necessary mitigation.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Addition to the supporting text in development associated with significant transport movements will require a transport assessment. Engagement with Highways England and SCC Highways in relation to cumulative highways modelling and highways improvements around Seven Hills.

The policy states that the Council will resist any significant intensification of use which would have a demonstrable adverse impact on surrounding uses.

Policy SCLP10.4 sets out policy in relation to development that may impact on the AONB.

## Policy SCLP12.34 Land at Silverlace Green & Former Airfield, Parham

Total comments	Support	Object	Observation
2	0	0	2

### Statutory Consultees

Suffolk County Council recommend the inclusion of a criterion in the policy stating the need for a Transport Assessment on all proposals that come forward on the two sites, due to the limited local highway network and lack of sustainable links to site, which would be likely to limit the scale of use in highways terms.

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Included in both site allocation policies is reference to a transport assessment demonstrating the scale of uses to be satisfactory in highways terms, in light of the limited local highway network.

## Policy SCLP12.36 Bentwaters Park, Rendlesham

Total comments	Support	Object	Observation
6	1	2	3

### Statutory Consultees

Natural England comment that these allocations will require an assessment of the impacts on landscape and designated sites, including project-level Habitats Regulations Assessment. Design and landscaping including greenspace and Net Gain, should take account of the location in or the setting of, the protected landscape.

Suffolk County Council comment that development in Rendlesham will impact on the Woods Lane cross roads in Melton which is approaching theoretical capacity. However, depending on the site arrangements the main impacts of other uses may not have the same peak impacts as a similar sized residential use. However annual, monthly and daily traffic flow limits have been set for this area which are already close to being met by the baseline traffic. Therefore, any significant development would have to demonstrate that these thresholds would not be exceeded, and any additional impacts can be mitigated. The County Council is concerned that the individual proposals on this site, increasing vehicular movements to and from the site, may not in themselves create a severe impact. In order to reflect the cumulative impact issues reflected in the policy, the County Council would welcome the opportunity to discuss the operation of this policy to ensure that cumulative impacts can be managed.

### Parish and Town Councils

Ufford Parish Council comment that they appreciate the employment benefits of further development at Bentwaters Park but further development at Rendlesham continues to add to the traffic bottleneck at the Melton Crossroads. As a consequence of this, many drivers seek alternative access to the A12 and use the tiny lanes through Ufford as a 'short-cut' and the daily 'rat-run' of traffic both in the morning and evening has a very negative impact on Ufford residents.

Tunstall Parish Council comment that they appreciate the employment benefits of further development at Bentwaters Park but further development at Rendlesham continues to add to the traffic bottleneck at the Melton Crossroads. As a consequence of this, many drivers seek alternative access to the A12 and often turn north to use both Ivy Lodge Road and Ashe Road. We have seen a significant increase in traffic using these roads and further expansion at Rendlesham will only make this worse.

### Other organisations

None received

### Developers/Landowners

Base Business Park and Bentwaters Parks Ltd support 'carrying forward' the allocation of the Bentwaters site as a General Employment Area. Recognition that it is a successful economic asset to the district. The draft policy and our proposed amendment is necessary to continue to allow the businesses continue to adapt and grow. Flourishing creative industries sector.

Suggested amendment to the policy and its preamble. Airfields are inherently suitable for a range of renewable energy developments. Base Business Park has both a biofuel facility and a large amount of rooftop solar power. Specific local benefits, such that a perfectly sensible scheme might fall foul of this criteria. We would therefore Suggest removal of Criteria C or for it to be reworded as "provide benefits to the surrounding community where relevant" or "in the case of wind development provide benefits to the surrounding community".

### **Members of the Public**

None identified

#### **How these comments have been taken into account in the Final Draft Local Plan:**

All Local Plan policies are subject to Habitats Regulations Assessment. Landscape policies in Section 10 apply.

Supporting text wording includes that detailed planning application conditions, most notably traffic impact on the local road network, provide the baseline for the policy. Engagement with Suffolk County Council Highways has been undertaken in relation to cumulative transport modelling of the Plan.

Matter in relation to the suitability of airfield sites for renewable energy developments and required community benefits is for the Renewable Energy policies.

## Policy SCLP12.37 Riverside Industrial Estate, Border Cot Lane, Wickham Market

Total comments	Support	Object	Observation
2	0	0	2

### Statutory Consultees

Suffolk County Council comment that any proposals that generate a significant amount of traffic movements from this site should provide a Transport Assessment to assess the impact of the proposal on the local highway network.

### Parish and Town Councils

Wickham Market Parish Council comment that whilst Wickham Market Parish Council supports this policy and welcomes its retention we have queried the inclusion of the policy for Wickham Market as all other village policies have been removed due to our emerging Neighbourhood Plan.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Change has been made to the supporting text concerning developments associated with significant traffic movements.

The Final Draft Local Plan provides comprehensive policies for Wickham Market including setting a housing requirement for the emerging Neighbourhood Plan to identify specific deliverable housing sites.

## Policy SCLP12.38 Land to the east of Aldeburgh Road, Aldringham

Total comments	Support	Object	Observation
6	0	0	6

### Statutory Consultees

Suffolk County Council recommend the requirement of a pedestrian crossing facility to enable occupiers to access the local footway network. Additionally, due to the estimated generation of 10 children from the number of dwellings proposed on the site and the capacity constraints at Coldfair Green Primary School including its potential inability to expand, The County would consider expanding Leiston Primary School as an alternative, if required. There is an uninterrupted footway linking the site and Leiston Primary School. There is capacity at the catchment secondary school to support the estimated 7 additional secondary school age occupiers.

Suffolk County Council would appreciate the opportunity to discuss the Anglian Water Comments (paragraph 12.286).

### Parish and Town Councils

None received

### Other organisations

Suffolk County Council AONB Team raised some potential improvements to the policy, including that any development on the site should consider the impact of external lighting on the setting of the AONB, given the sensitive location of the site, and the requirement to undertake a Landscape Visual Impact Assessment (LVIA) to assess the impact of development on the AONB.

RSPB comment that the proposed project level Habitats Regulations Assessment in the supporting text should be required in the policy and should require that any proposals on the site consider recreational effects on the Sandlings SPA as well as the stated hydrological effects, as recommended in the Habitats Regulations Assessment Screening Report.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

A requirement for a project level Habitats Regulations Assessment has been included within the policy, which reflects the conclusions of the HRA.

The supporting text requires the project level HRA to consider hydrological effects. A contribution to the Recreation Avoidance and Mitigation Strategy will also be required.

A Landscape Visual Impact Assessment and consideration of the impact of external lighting on the setting of the AONB have been added to the policy, as recommended by Suffolk County Council AONB Team.

The policy criterion regarding a pedestrian crossing has been strengthened, altering the status of the criterion from a suggestion to a requirement.

## Policy SCLP12.39 Land south of Forge Close between Main Road and Ayden, Benhall

Total comments	Support	Object	Observation
25	1	18	6

### Statutory Consultees

Suffolk County Council state the site lies in a Source Protection Zone (SPZ) and hence the treatment of surface water for pollutants prior to disposal is vital. This may require larger areas to be dedicated for Sustainable Drainage Systems.

Suffolk County Council state the proposed access to the site via the development to the north may require upgrading to accommodate additional development. SCC also state new footway links to local amenities will be required.

Suffolk County Council state the estimated generation of 13 primary school age children from the development could be accommodated by Benhall St Mary's CEVCP School and the proposed new primary school at South Saxmundham Garden Neighbourhood. Alternatively, the 13 children could be accommodated through an expansion to Benhall St Mary's CEVCP School, to accommodate 25 additional children. Additionally, there is capacity at the relevant catchment secondary schools to accommodate the estimated generation of 9 secondary school age students from the site.

### Parish and Town Councils

Benhall and Sternfield Parish Council object to the site allocation due to it being contrary to Policy SCLP5.2, that 50 dwellings does not constitute a small scale of development, and would be out of character with the village form. The Parish Council suggest a more distributive spread of dwellings (totalling 40 dwellings) across a number of sites in the village, the two main sites being the proposed site allocation (with a greater gap between new and existing dwellings) and land to the north of the recreation field.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Support:

A member of the public has supported the proposed site allocation but would like the area of the site eastwards of the south of Forge Close to open space. Support is stated to be conditional on the proposed open space being designated a protected area.

Object:

Comments relating to the loss of agricultural land.

Respondents have commented that it is too much development, including due to recent and historic development.

Respondents comment that development would be detrimental to local character.

Respondents raise concern that existing infrastructure is inadequate in coping with proposed increase in population.

Respondents comment that healthcare is under pressure / at capacity.

It is commented that a new primary school is needed.

Respondents raise concern over utilities including that water supply is under pressure, sewerage disposal is under pressure, drainage is under pressure.

Respondents raise concern over increased traffic.

Concern over light pollution.

There is limited car parking.

Respondents raise concern over impact on landscape.

Development would be detrimental to wildlife and habitats.

Development would be detrimental to tranquillity of the area.

Cattle have been buried in the field due to foot and mouth disease.

There are limited employment opportunities nearby.

Respondents suggest an alternative strategy including spread the growth over a number of sites in the parish and support for Benhall and Sternfield Parish Council suggestion of use of sites 493 for 20 dwellings, 507 for 15 dwellings, and infill of 5 dwellings on sites 247, 817 and 818.

Separation between site and existing residents to the rear of the site should be maintained.

Object (no reason given).

Object to 50 houses being built over 3 years.

Observation:

A new village green on the development would create a new focal point for the village and should be required.

**How these comments have been taken into account in the Final Draft Local Plan:**

Reference has been made to the potential for Sustainable Drainage Systems to be of a larger than usual area due to the presence of a Source Protection Zone.

Included in the policy is the requirement for upgrading to the existing access used by the development to the north to the satisfaction of the highways authority.

Included in the policy is the requirement for development to make enhancements to pedestrian access to Footpath 26 and cycle access where possible in order to safely link the development to the amenities of the village.

Alteration to the site has resulted in a different area for allocation, with existing use retained between the proposed development of 50 dwellings and the existing built area of Benhall in order to take account of a key feature of local character, that of the dispersed nature of development across the Benhall, Benhall Green and Sternfield.

The impact of development of the proposed site allocations in close proximity to Benhall will be subject to a Transport Assessment, which will need to demonstrate that the traffic emanating from proposed development will be sufficiently accommodated within the local highway network, to the satisfaction of the highways authority.

Capacity constraints in regard to local infrastructure resulting from development of the proposed site allocation have been identified in the Infrastructure Delivery Framework, including information detailing how each identified infrastructure requirement is expected to be funded.

## Policy SCLP12.40 Land at The Street and Mill Lane, Brandeston

Total comments	Support	Object	Observation
59	2	47	10

### Statutory Consultees

Suffolk County Council recommend a requirement for any development proposals to make provision for pedestrian access to Mill Lane.

Suffolk County Council comment that it is not clear that Easton Primary School can expand to meet the demand created by this site, and another allocated in the catchment. Furthermore, this site is not within a safe walking distance of the school. SCC would like further discussions before supporting the site allocation. Thomas Mills High School is forecast to exceed capacity and this development will further exacerbate a shortfall in places, with an estimated generation of 5 secondary school age pupils. The school has limited ability to expand on its current site, but the school is not landlocked. The County Council will consider whether expansion is likely to be required during the plan period, and advise the District Council in respect of any additional land requirements.

### Parish and Town Councils

Brandeston Parish Council object to the proposed site allocation for the following reasons; detrimental impact on the setting of the conservation area particularly the rural approach to the village, the unsustainable nature of the village with limited facilities for which a private car is almost a requirement, dangerous access to the site, utilities infrastructure issues, flood risk, impact on the biodiversity of the area, increased traffic, and the perception that affordable housing is not needed in the area. However the Parish Council would consider gradual, small scale development according to need and in keeping with the current village layout and appearance acceptable.

Brandeston, Kettleburgh and Easton Parish Councils object to the proposed site allocation as a result of the increased level of traffic generated from development of the site. It is suggested the allocation does not comply with Policy SCLP7.1 Sustainable Transport.

Easton Parish Council object to the proposed site allocation as it is considered the development would result in a too high number of houses in the areas of Brandeston, Easton and Kettleburgh. The Parish council judge the road network to be unsuitable to the proposed level of local development and the facilities on offer in the settlements to be too limited to support the developments.

### Other organisations

The Suffolk Preservation Society comment that the site is a prominent gateway into the Village and also abuts Brandeston Conservation Area and as such requires careful design that reflects the scale and density of the village. The Society also suggest a development of significantly fewer than 30 dwellings would more appropriate.

**Developers/Landowners**

None received

**Members of the Public**

The majority of comments believe the proposed allocation cannot be accommodated in any form on this site in that the site; is entirely out of context with the Brandeston Conservation Area, will not provide affordable housing due to the local history of development escaping affordable housing provision and that Brandeston as a rural unsustainable location (limited facilities, employment opportunities, schools, public transport) is not a good location for affordable housing, and is poorly located for access near to a dangerous bend which is prone to speeding.

Object:

Vision Design and Planning Consultants acting on behalf of the local residents of Brandeston have raised a number of concerns regarding the suitability of the site for development and consequently object to the allocation of the site for residential development. The comments raised include the following; development of 30 dwellings would be out of character and of an inappropriate scale in relation to a small village, development of the site would create a hard urban edge to the village which would negatively impact local character, terraced housing and bungalows would be inappropriate in relation to Brandeston conservation Area which it directly abuts, retention of the hedgerow along the southern boundary will be incompatible with highways objectives particularly visibility splays, the estimated increase in traffic from the development and the proximity to the transition from 30mph to national speed limit zone would result in unsafe means of accessing the site, and the lack of footpaths will make any development unacceptable.

A large number of respondents comment that it is too much development for Brandeston.

Respondents comment there has been significant development in recent history (39 houses since 1986).

A large number of respondents comment on access including that access is via a 'blind bend' x21, access to the site is dangerous, the visibility splays needed cannot be provided if the hedgerow is retained as stated in bullet f) in SCLP12.40 and pedestrian access cannot be provided.

A large number of respondents comment increased traffic including in relation to rural roads and a problem with speeding in the village.

It is commented that there would be increased pollution from increased traffic due to poor public transport.

A number of respondents comment on healthcare including pressure on doctors surgeries, doctors surgery is at capacity and no medical facilities in the village.

A large number of respondents raise concerns over education including pressure on school places, local schools are at capacity, there is no school in village and Easton Primary School cannot expand.

A number of respondents comment in relation to utilities including that sewerage systems are under pressure and there is limited utilities infrastructure.

A number of respondents comment that there is flooding in the area Flooding.

A large number of respondents comment that there is limited public transport / bus services.

Respondents comment that there is limited car parking.

A very large number of respondents comment that there is a lack of facilities in the village, including that there is no village shop, no post office and local facilities are 3 miles away so living in the village is reliant on a private car.

Respondents comment that the field acts as a public open space as the landowner lets it be used as such. Hence, development would result in a loss of open space.

A very large number of respondents comment that there will be an impact on the character of the area including that development will ruin the character of the village, it is high density and a large number of dwellings, recent development is out of context with the existing local character, development will ruin the character and setting of the conservation area, Brandeston Conservation Area Appraisal restricts development in this site's location, the green entrance to the west of the village is an important feature of the character and setting of the village, development of the site must be carefully thought through as the site occupies a prominent location entering the village, affordable housing in this location would harm the character of the existing surrounding houses, low density is a key feature of local character as quoted in the Conservation Area Appraisal, curbs, street lights and other street clutter will harm the character of the area.

A number of respondents comment on loss of wildlife habitat.

A number of respondents comment on the loss of agricultural land and loss of potential agricultural land.

A number of respondents comment that there are no employment opportunities.

A number of respondents comment that there are no footpaths and a comment is made that the addition of a footpath would be out of character with the rural extent of the village.

A number of respondents comment that there is no street lighting.

Respondents comment that there are slow broadband speeds.

Concern that the homes would be second homes.

A number of respondents query whether Brandeston is a good location for affordable housing as there are no employment opportunities or affordable housing.

Concern is raised that the proposed density of the housing will result in unacceptable overlooking and privacy for residents.

A number of comments query whether there is a need for housing / affordable housing in Brandeston. An Inspector has commented that there was less of a demand for affordable housing in this location compared to other locations [appeal Ref APP/049/2015].

A number of respondents suggest an alternative strategy including that housing should be located near to employment, housing growth should be on brownfield land before greenfield is explored, housing should be restricted to infill development and housing should be located in the bigger settlements.

It is commented that the development would reduce the health and mental wellbeing of disabled residents.

Observation:

Employment opportunities include the Queen Pub, gardening, Earl Soham businesses, Wickham Market, Framlingham, Parham Garage.

The site could be used for what is needed in the community including starter homes, family affordable homes, smaller properties for existing residents keen to downsize, well-designed homes to fit our precious landscape and strictly limited to those with a familial, work or historic link should be built.

Much of the opposition to the proposed site allocation is based on emotion and Nimbyism.

Speeding is no longer a problem according to the SID data.

**How these comments have been taken into account in the Final Draft Local Plan:**

Consultation feedback in relation to impacts on the Conservation Area raises a number of factors that limit the potential of development on the site. Low densities, gaps between buildings and single plot depths are identified as particularly valuable characteristics of the Conservation Area. In order to address these issues the site would have to be reduced to allow for development that only fronts The Street and backs onto open countryside, with gaps between dwellings to maintain the dispersed development nature of the extents of the village, where the built area meets the countryside, as opposed to the centre of the village. This would reduce the site size to approximately 0.15ha and hence below the size threshold (0.2ha) for allocation and also reduce the potential of the site to deliver at least 5 dwellings, as identified in the Site Selection Topic Paper.

## Policy SCLP12.41 Land to the South East of Levington Lane, Bucklesham

Total comments	Support	Object	Observation
7	1	3	3

### Statutory Consultees

Suffolk County Council comment that there is a requirement for widening of Levington Lane to access point and provision of footway to join existing footway.

Suffolk County Council comment that Bucklesham Primary School is forecast to exceed capacity, and contributions are expected to be sought to enable expansion. Additional secondary school demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

The landowner comments that the site is currently farmed in hand by the owner and there is no reason why the site should not be brought forward for development as soon as practically possible and within the delivery timescale of 2020 – 2025. The owners are actively seeking a promoter / developer to work with on this site.

There are few constraints to this site and those minor constraints raised are not insurmountable. Through the provisions to retain as much of the existing hedge and trees as possible and through careful treatment of new boundaries the site can be developed with as little visual impact as possible. The site provides a natural extension of Bucklesham village. The site adjoins houses to the north and the proposed shaped and size of the site would not look unnatural in the context of the existing layout and design of the village.

Artisan PPS comment that there is a better alternative location at Street Farm as an extension to the existing mixed use development of housing and employment which the council has already approved for further and additional mixed growth. Previous representations made for this land and its allocation are maintained. The development of that land would have far less landscape and highways impact than the proposed allocation.

### Members of the Public

Object:

Small local lanes cannot deal with more cars.

There is a need for shops and local facilities because not everyone drives in Bucklesham and the bus service is very limited.

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text reflects requirement for highway / footway works.

Site allocations and policies in the Final Draft Local Plan have been subject to supporting cumulative highways modelling. The supporting Strategic Housing and Employment Land Availability Assessment has included engagement on highways impacts of potential sites such as recorded safety issues. The Strategic Housing and Employment Land Availability Assessment findings have been used to inform the selection of potential SHELAA sites for allocation for new development.

The supporting text to the policy reflects education and other County Council infrastructure provision.

Supporting retail evidence does not provide justification in a viable development requirement for new retail in Bucklesham. However, Local Plan policies including the spatial strategy, retail, community facilities and settlement boundaries policies provide a positive framework to support proposals for a new shop within the established built up area of Bucklesham village.

The site at The Street is characterised by environmental and water infrastructure issue in the supporting Strategic Housing and Employment Land Availability Assessment. Whilst these are not insurmountable the alternative site is not preferable to the site allocation to accommodate modest housing growth and support local services in Bucklesham.

## Policy SCLP12.42 Land to the south of Station Road, Campsea Ashe

Total comments	Support	Object	Observation
13	2	6	5

### Statutory Consultees

Suffolk County Council – no highways issues identified.

Suffolk County Council comment that the development, along with another in the catchment, is expected to take Eyke Primary School over catchment. Land is provided adjacent to Eyke Primary School to enable expansion if required. Additional land for secondary spaces would be met at Brightwell Lakes school, and a CIL contribution is required.

### Parish and Town Councils

Campsea Ashe Parish Council comment that the Parish Council is not against sensitive and appropriate housing development. The site fills in vacant land. Appropriate criteria have been identified and compliance should be compulsory. Residents in the immediate vicinity have commented that 12 dwellings are too many. Residents in the wider village appreciate the provision of affordable housing. The main concern of the Parish Council is that the development is outside of the settlement boundary.

The village does have amenities. There is a problem with HGVs, tractors and trailers (tractors and trailers relating to agricultural digesters at Bentwaters) using the village – the roads are not wide enough which presents safety issues. Ivy Lodge Road and Marlesford Road have become shortcuts. The B1078 has a number of sharp bends and is not good for large vehicles / cars and for traffic entering and exiting Mill Lane. Concern of impacts in combination with proposed development in surrounding villages, in relation to HGVs, traffic and air quality.

### Other organisations

Westover Landscape Ltd comment that all impacts from development on Wickham Market surgery and other facilities need to be known.

Suffolk Preservation Society considers the site is an important area of open space which currently provides a visual gap between the main village and the cluster of historic buildings which includes the adjacent listed Old Rectory and St John the Baptist Church. Development would bring the distinct cluster into the main settlement, altering its character as a rural hamlet and should be avoided.

### Developers/Landowners

Red House Farms Ltd support the allocation on the basis that it forms a deliverable site in the context of the NPPF which is well related to the settlement and has no insurmountable constraints to development. It will contribute the achievement of sustainable development through significant economic, social or environmental gains for the area. Red House Farms generally support the

criteria, particularly relating to the need for development to be sympathetic to the nearby listed buildings and the village.

Hopkins Homes support the proposed allocation on the basis it is a deliverable site well related to the settlement. It will contribute the achievement of sustainable development through significant economic, social or environmental gains for the area. Hopkins Homes support the criteria, particularly the need to have regard to the setting of the Listed Building. The company is a renowned local housebuilder who consistently creates high quality, traditionally designed developments which complement the surrounding area. The policy should be amended to reflect that if a scheme of less than ten dwellings comes forward, no affordable housing provision is required.

### **Members of the Public**

#### Objection:

The Proposed size of development is out of character for the location.

Respondents comment that the proposed development would harm the setting of the Listed Buildings. It is commented that all Listed Buildings in the area should be referred to.

Respondents comment that the site is outside, and not adjacent to, the Settlement Boundary. Applications for development outside of the Settlement Boundary have been refused in the past.

The proposal does not comply with Policy SCLP5.3 Housing Development in the Countryside.

The site has previously been identified as being poorly related to the settlement.

The site is in a low density, dispersed part of the village.

It will place excessive strain on services and infrastructure. School places at Eyke are close to capacity.

There is a pond on the site.

Surface water flooding has been recorded on the site, which would be increased with the development.

The site is a greenfield site.

Respondents raise concerns over highways safety and speeding traffic.

The land has no mains drainage.

The allocation does not preclude the possible extension of the allocation to create a mini housing estate. Land beyond must not be opened up for development and should be made impossible.

Respondents comment that development should be strictly limited to the roadside in line with neighbouring properties.

The number of dwellings proposed should be specific and be reduced. A high quality development of around 4 homes would be more acceptable.

Development approved under C/10/2510 is very high density. The criteria in the policy are conflicting with the density and could not be met.

It is not clear whether the local infrastructure could accommodate increased housing of that scale.

Respondents comment that alternative sites have been properly investigated. It is odd that the site has been selected given its setting, and any conditions put onto it would be hard to adhere to if 12 houses were built. Sites 84 and 129 are considered to be available and should be more thoroughly investigated.

Concerns raised over District Councillor land ownership.

Site should not be allocated.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Requirements in relation to education provision have been reflected in the supporting text to the Policy and within the Infrastructure Delivery Framework.

It is acknowledged that the site is outside of the Settlement Boundary. Consideration has been given to how the site relates to the station and the settlement in identifying the site for allocation. Not all allocations are within the Settlement Boundary, but where a site allocation is adjacent to the existing Settlement Boundary the boundary has been drawn around the allocation.

The Council has liaised with Suffolk County Council in relation to roads and access, and transport modelling has not identified specific capacity issues in this location.

The Council has engaged with the NHS and Clinical Commissioning Group in relation to the need for contributions towards enhancements for health facilities. The supporting text to the policy and the Infrastructure Delivery Framework set out a need for contributions to be made towards Wickham Market Medical Practice.

The policy requires development on the site to reflect the setting of the Listed Building and further text has been added to focus the development in the northern part of the site. Reference has also been added in the supporting text to the Grade II\* Listed Church of St John the Baptist.

The supporting text and the Infrastructure Delivery Framework identify the requirement for a contribution towards additional school places at Eyke CoE primary School.

The area of surface water flooding is acknowledged in the supporting text and there is a policy requirement for surface water disposal to be in accordance with the water management hierarchy.

In identifying an appropriate number of dwellings for the site the Council has considered the presence of Listed Buildings and the site's location in relation to the policy in the National Planning Policy Framework which aims to make efficient use of land.

Sites 84 and 129 are identified as being unavailable in the Strategic Housing and Employment Land

Availability Assessment.

## Policy SCLP12.43 Land behind 15 St Peters Close, Charsfield

Total comments	Support	Object	Observation
11	2	2	7

### Statutory Consultees

Suffolk County Council comment that based on the drainage of the adjacent development, infiltration may be deep and infeasible. Consideration will need to be given to the impact of any infiltration on downstream properties given the site's gradient. There are no highways issues provided access is taken from St Peters Close. A pedestrian link to the recreation ground should be provided if feasible. Charsfield Primary School is forecast to have sufficient spare capacity to accept pupils arising from this development. Thomas Mills High School is forecast to exceed capacity and this development will exacerbate the shortfall in places. The County Council will consider whether expansion is required during the plan period and whether there are additional land requirements.

### Parish and Town Councils

Charsfield Parish Council support the proposal. A mix of 2 bedroom affordable housing and 3 bedroom detached bungalows would be most beneficial to the village, as well as accessible properties. There are currently under occupied larger properties with residents who wish to stay in the village.

### Other organisations

The Ramblers Association comment that a diverse ecosystem and thriving network of paths should be maintained. Any existing footways should be taken into account in any proposed development. This not only means what is on the Definitive Map for the Parish but also routes regularly walked. A walk by the Parish Council over a site to be developed will usually allow such routes to be included in the development. At least an equivalent network should be available on completion than that which existed. In Charsfield there is a relatively new/improved recreation area near Chapel Lane. There is a route from the northern spur of this which allows access to the recreation ground and would be useful for those in the area planned for development. It appears on older definitive maps (1/1/61). It joins FP17 and FP18.

Suffolk Preservation Society comment that the site appears to be well linked to the recreation ground and through new development to the rest of the village. However it is not a logical extension to the village being bounded on three sides by agricultural land. It is on raised ground and may be prominent in longer views and therefore welcome reference to the setting of Grade I listed St Peters Church.

### Developers/Landowners

A M W Fane support the policy and state that the intention is to undertake pre-application following formal allocation so any housing numbers will definitely be within the Plan period.

## Members of the Public

### Object:

Concern is raised that increased vehicle access from The Street will destroy the village character. Concern over the effect of extra traffic on infrastructure in The Street. This will lead to about 60-80 additional cars through the permitted development and proposed allocation. The village community and road infrastructure cannot support this.

It is commented that provision for access needs to take into account the permitted site, and access needs to be suitable for construction traffic and residents' traffic.

It is commented that the highways infrastructure on St Peters Close is very poor, and should be improved with this development. Consideration should be given to highways access from The Street.

Concern is raised over speeding vehicles on The Street and most of The Street is unpaved. Consider how traffic on The Street can be slowed down.

It is commented that in combination with the permitted site there will be strain on the drainage/sewerage/rainfall/disposal infrastructure.

It is commented that the bus service to Woodbridge and Ipswich isn't any good for commuting and there is no evening service. There is no bus service to Wickham Market which provides Charsfield's immediate needs. The Plan should include a plan for realistic bus services.

It is commented that the proposed allocation is a better site than 102 or 890, however sites 813, 318 and 814 are considered to be better. This area previously had a higher population and Davey Lane lends itself to infilling. Safe highways access could be achieved and development of these sites would represent a better balance for the village.

When considered with the site with planning permission to the south, development of the proposed allocation would represent an increase of around 40 dwellings in this part of the village.

### **How these comments have been taken into account in the Final Draft Local Plan:**

Reference to the possibility for off-site drainage has been added into the supporting text.

The policy includes a requirement for a pedestrian link to the recreation ground.

The supporting text and the Infrastructure Delivery Framework identify the need for contributions towards spaces at Thomas Mills High School.

The policy requires a mix of housing including the provision of smaller properties and bungalows.

Policy SCLP8.2 provides for recreation opportunities and requires new development to contribute to the provision of open space and recreational facilities. This could include Public Rights of Way.

The Council has engaged with Suffolk County Council in relation to access and the road network, and the transport modelling has not identified any capacity issues within this location.

The policy includes a requirement for the applicant to demonstrate that there will be capacity in the

Water Recycling Centre.

Infrastructure requirements have been included alongside the policy, reflecting the Council's evidence and engagement with infrastructure providers.

## Policy SCLP12.44 Land to the South of Darsham Station, Darsham

Total comments	Support	Object	Observation
15	0	8	7

### Statutory Consultees

Suffolk County Council comment that the site is within a Minerals Conservation Area. However, they recommend no action be required in the policy as there are no mineral resources under the site and that existing housing has already sterilised nearby resources. The site is within 400m of a waste water treatment plant and so the amenity impacts will need to be considered.

Regarding archaeology, the County Council consider the following wording should be added to the supporting text: 'This large site lies on a south facing slope overlooking the River Yox, and has not been subject to systematic archaeological investigation. Suffolk County Council have highlighted that assessment should be required to inform any planning application to ensure that proposals are sensitive to assets of archaeological interest.' The following wording should added to the policy: 'Archaeological assessment will be required (geophysical survey in the first instance).'

Suffolk County Council support the proposed access point via Westleton Road as access via the A12 would be dangerous due to significant rise in the road leading to visibility constraints. The County Council also mention the need for improvements to the pedestrian and cycle links to Darsham Train Station and Yoxford.

Suffolk County Council comment that it is estimated that 30 children of primary school age will be generated from development of 120 dwellings on the site. Yoxford Primary School has sufficient capacity to accommodate these pupils. The estimated generation of secondary school pupils from the proposed site allocation can be accommodated by the two catchment secondary schools without the need for expansion.

### Parish and Town Councils

Darsham Parish Council has commented in objection to this site allocation and raise a number of concerns regarding potential development. They are particularly concerned that the number of dwellings proposed is too many for the size of Darsham even though the site is better related to Yoxford. Concern regarding potential access to the site from Westleton Road and that development would restrict potential future road widening of the A12 were mentioned. The development would place undue pressure on the nearby medical facilities. Furthermore, the Parish Council is concerned the train station in its limited capacity will not be able to cope with the increase in demand, and car parking at the station would not adequately accommodate the increase in demand.

Yoxford Parish Council have commented in objection to this site allocation and raised a number of concerns regarding potential development. They also acknowledge benefits the site presents, such as; proximity to the A12 and Darsham Station, and the utilisation of the existing facilities such as the shop and petrol station north of Darsham Station. The concerns they raise are as follows; the distance from the centre of both Yoxford and Darsham is deemed too great to enable sufficient community cohesion, the dangerous route along the A12 children would travel in reaching Yoxford Primary School and hence the potential for increased traffic in and around the primary school particularly at drop off and pick up times, increased traffic in Yoxford in reaching amenities which are perceived to be inaccessible via pedestrian access from the site, the Local Plan should not rely on the proximity to a petrol station as these are bound to change with the increase in adoption of electric vehicles, the use of a number of smaller and better related sites to reach the same number of dwellings as at the proposed allocation is deemed a more preferable approach to development in Yoxford and Darsham. The Parish Council have suggested alternative site options, subject to availability, of 'The Piggeries' and 'Land to the west of the A12 and south of the Old High Road'.

### **Other organisations**

Heveningham Hall Estate have raised concerns over potential conflict between the landscaping works to Cockfield Hall Parkland and this proposed site allocation, to the extent that careful and full attention should be given to the design of any development on the site so as to preserve and enhance the locally significant parkland and nationally significant property adjacent to the proposed site allocation. Of greatest concern is the potential height of any development and the layout of development particularly on the highest contours of the site that may have a detrimental impact on views from the parkland. They are pleased to see an area of open space be encouraged in the southern part of the site.

Westover Landscape Ltd has raised concerns regarding the impacts of development on the neighbouring Historic and Park and Garden and the need for a comprehensive Landscape Visual Impact Assessment and a landscape scheme of mitigation to be conducted prior to any development being permitted, the impacts of coalescence between Yoxford and the Darsham Station, arrangement of dwellings and facilities and the cumulative highways and lighting impacts in light of Park and Ride proposals north of the Darsham Station.

### **Developers/Landowners**

None received

### **Members of the Public**

#### Object:

Respondents comment that this is too much development for the size of Darsham.

Respondents raise concern over landscape including that development on the high ground will dominate the landscape and development of apartments will exacerbate the dominant location in the landscape.

It is commented that development of this scale will have a detrimental impact on local character.

Respondents comment in relation to the railway in that it has limited capacity, the timetable is not conducive to commuter travel and there is a need to cross the A12.

It is commented that access via Westleton Road will be dangerous.

Respondents raised concern over increased traffic including that there would be increased car dropping off at Yoxford primary school as children cannot be expected to cross the A12 to get to and from school.

Respondents comment that it is an isolated development which will have no footpath to Yoxford or Darsham without crossing the A12.

It is commented that there would be pressure on education provision.

It is commented that there would be pressure on medical facilities.

Concern is raised that the houses will be used as second homes.

Concern raised over coalescence.

An alternative strategy of allocating housing near employment opportunities is suggested.

Respondents comment on impact on residential amenity including overlooking and loss of privacy.

Observation:

Support for development in close proximity to Darsham Station

Site 1130 (North of Darsham Station) is suggested to be more sustainable for mixed use development than the proposed allocation South of Darsham Station.

**How these comments have been taken into account in the Final Draft Local Plan:**

Included within both the supporting text and policy is reference to appropriate assessment of archaeological significance of the site.

The proposed vehicular access point in the south of the site via Westleton Road is supported by Suffolk County Council.

Reference in the policy to pedestrian and cycle links to both Darsham rail station and Yoxford village, including a crossing point on the A12, have been strengthened in order to support the ability of future residents to safely and sustainably access Yoxford and Darsham Station facilities while also reducing the reliance on the private car.

The site's location along the A12 and subsequent transport benefits and its close proximity to Yoxford and Darsham rail station and other nearby facilities support the proposed scale of development and the efficient use of the site.

Constraints on local infrastructure resulting from development of the site have been identified in the Infrastructure Delivery Framework, which also details the expected funding arrangements to alleviate the identified infrastructure constraints.

It is envisaged that residents of the built out site will utilise the required improvements to the pedestrian and cycle infrastructure, as detailed in the policy, in accessing Darsham rail station in order to alleviate pressure on the car parking opportunities at the station.

It is considered that there is no reason to question the services and facilities in Yoxford and at Darsham rail station are likely to either move or close.

Development of the site is deemed the most suitable and deliverable option in regard to other sites in the area considered for allocation throughout the Strategic Housing and Employment Land availability Assessment process.

Protecting and conserving the heritage and landscape significance of the Cockfield Hall park and garden has been addressed in the policy through the required undertaking of a comprehensive Landscape Visual Impact Assessment, which is to inform a landscape scheme of mitigation. Furthermore, design of proposed development is to take account of any impacts on the Cockfield Hall park and garden.

Provision of development on the upper slopes of the site is intended to be more suitable than development in the south of the site due to close proximity to Cockfield Hall park and garden and the visual influence on coalescence between Yoxford and Darsham Station and hence the impact on settlement identity. The provision of development within landscaped grounds can help to alleviate any visual impact on the park and garden, in addition to the existing wooded boundary to the A12.

## Policy SCLP12.45 Land north of The Street, Darsham

Total comments	Support	Object	Observation
9	1	5	3

### Statutory Consultees

Suffolk County Council state that the existing access via Millfields development may need upgrading to accommodate the additional 25 dwellings. They also mention alternative access via The Street is feasible but will require footway access and hence may lead to the removal of trees/hedges.

Suffolk County Council comment that capacity exists at Yoxford Primary School to accommodate the additional primary school aged pupils generated from the development, which is expected to total 6. However, the County state a footway should be provided linking to the existing footway network, with the intention of providing safe pedestrian access to Yoxford Primary School. There is sufficient capacity across the two catchment secondary schools to accept the pupils emanating from 25 dwellings proposed on the site, without the need for expansion.

### Parish and Town Councils

None received

### Other organisations

Westover Landscape Ltd comment in support of criteria a) for the retention of important trees, particularly the TPOs.

### Developers/Landowners

Hopkins & Moore support the allocation which will contribute towards achievement of sustainable development through provision of significant economic, social or environmental gains for the area. Alternative and safer access can be provided from The Street whilst maintaining the public amenity value of the frontage. Open space and additional planting will result in no significant adverse ecological impact. The policy should be amended to confirm that access can also be proposed from The Street subject to appropriate retention of trees. The wording in the policy relating to retention of trees should be included within the policy.

### Members of the Public

#### Object:

Respondents comment that this is too much development /there has been too much development over recent past for the size of Darsham.

It is commented that development of 15 dwellings will be acceptable.

It is commented that development will destroy local character.

Old trees border the site.

Respondents comment that development will destroy the habitat for wildlife.

It is commented that access is via an unadopted road

There will be an increase in traffic.

It is suggested that development should not begin before 2030 due to consistent development within the village which needs time to assimilate.

**How these comments have been taken into account in the Final Draft Local Plan:**

Darsham is identified as a Small Village and is close to the A12 and therefore additional development supports the strategy of the Local Plan.

Reference has been made to the potential for the Millfields access to be upgraded in order to accommodate the proposed development and enhancements to the existing footway along part of the southern boundary. The policy has been amended to provide more flexibility around where the site may be accessed.

Retention of the trees along the southern site boundary has been identified as an important criteria with community support.

## Policy SCLP12.46 Land off Laxfield Road, Dennington

Total comments	Support	Object	Observation
11	4	1	6

### Statutory Consultees

Suffolk County Council comment that the following should be added to the supporting text: 'This site lies on a valley side, and Iron Age and Late Saxon/Medieval features were recorded to the south. The site has not been subject to systematic investigation and Suffolk County Council have highlighted that archaeological assessment should be required to inform any planning application to ensure that proposals are sensitive to assets of archaeological interest.' In this regard, text requiring an adequate archaeological assessment should be included in the policy text.

Suffolk County Council comment that springs are shown on OS Maps at this location which would suggest groundwater is going to be present at a shallow depth. Furthermore, the site is located within an SPZ so the treatment of surface water and the clearance from any infiltration features is critical.

Suffolk County Council supports the inclusion in the policy for the provision of a footpath along the site frontage, but also stated the need for a crossing point to link the provided footway to the existing footway network.

Suffolk County Council comment that the proposed development on the site would push Dennington Primary School over capacity, but the County welcomes the policy requirement for 0.7ha for future primary school expansion. Thomas Mills High School is expected to exceed capacity during the plan period. The County will advise SCDC in respect of any additional land requirements for the expansion of the school.

### Parish and Town Councils

None received

### Other organisations

Suffolk Wildlife Trust support the inclusion of a bat survey on site and the identification if any mitigation/enhancement measures, and suggests the policy could be improved by recommending any survey to assess likely impacts on any ecological receptors which may be present on or around the site.

### Developers/Landowners

Artisan PPS Ltd confirm the availability of the land for development and supported the proposed allocation.

Dennington Hall Farms support the proposed site allocation including the provision of footpath, school parking and drop off area, and the need for development to be sympathetic to nearby listed

buildings, the conservation area and the village as a whole. Dennington Hall Farms have in the past and will continue to support Dennington School.

Hopkins Homes Ltd support the proposed allocation. The representation makes reference to the sustainability of the location, which maintains the benefits of being in close proximity to the village centre which contains a public house, village hall and shop and is directly adjacent to the boundary of Dennington Primary School to the south. The site is well served by public transport with bus stops located by the public house within walking distance of the site providing links to larger settlements across the district and further afield. Although the policy is supported in principle, a change is sought as to the specific area required for the school expansion, which the developer believes is 'too prescriptive' and should be identified at the planning application stage. It is suggested that re-wording the policy is necessary, with reference made to the provision of 'up to' 0.7ha of land for school drop off.

### **Members of the Public**

#### Support:

Development would help meet needs for smaller dwellings, especially for young people.

Development would help alleviate car parking constraints in the village, particularly in relation to events at the pub.

#### Object:

Too much development for the size of Dennington.

Trees and hedges should be retained.

There would be impacts on local character.

Development should use traditional local materials.

Development would have a detrimental impact on the Grade II listed building to the south of the site.

Open space should be provided on the site and bordering the conservation area boundary.

Infrastructure is insufficient.

No additional discharge should be permitted in existing drainage ditches.

Respondents suggest alternative strategies which include development should be allocated over a number of smaller sites, development should be allocated over a number of settlements and development should be restricted to along Laxfield Road.

**How these comments have been taken into account in the Final Draft Local Plan:**

The need for an archaeological assessment has been included in both the policy text and supporting text.

Included in the policy is reference to the sites presence within a Source Protection Zone.

The criteria relating to the retention of hedgerow along the road frontage and that of suitable access to the site have been re-worded to include removal of hedgerow where access is required, subject to the replanting of removed hedgerow elsewhere on the site.

Reference has been made to the need for a pedestrian crossing point to link the pedestrian footway fronting the site to the existing footway network.

Included in both the policy text and supporting text is the requirement for an ecological survey.

Provision 0.7ha of land for the future expansion of Dennington Primary School is safeguarded in the policy. Future expansion of Thomas Mills High School is referenced within the Framlingham Neighbourhood Plan, for which an area of 2.6ha abutting Thomas Mills High School has been reserved. Furthermore, the Infrastructure Delivery Framework details the need for CIL payments will need to contribute towards additional places at Thomas Mills High School.

Recommendation has been made that any ecological survey undertaken, as required in the policy text, assesses the ecological receptors which may be present on or around the site.

Development is expected to take account of the Dennington Conservation Area Appraisal and the listed buildings to the south of the site. The wooded southern boundary and large back gardens will limit the extent of any impact on the heritage significance on such assets.

## Policy SCLP12.47 Land to the south of Eyke CoE Primary School and East of The Street, Eyke

Total comments	Support	Object	Observation
11	2	0	9

### Statutory Consultees

Suffolk County Council comment that the following supporting text should be included: 'This large site lies on the edge of the historic settlement core of Eyke, and late Anglo-Saxon and Early Medieval artefacts are recorded from the area. The site has not been subject to systematic archaeological investigation. Suffolk County Council have highlighted that archaeological assessment should be required to inform any planning application to ensure that proposals are sensitive to assets of archaeological interest.'

The following text should be included in the policy 'Archaeological Assessment will be required.'

Suffolk County Council comment that the site is in a Minerals Consultation Area due to presence of Lowestoft formation sand and gravel, and an assessment of material should be required to decide if use on site is desirable.

Suffolk County Council comment that the existing car park access would require improvement if used for development access. There should be sufficient off-street drop-off provision and parking provision for the school to maximise highway safety.

Suffolk County Council comment that this development, along with another site in the catchment, is expected to take the school over capacity. As such, land is provided adjacent to the school (policy 12.47) to enable the expansion of the school, if required. In relation to secondary schools, additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Eyke Parish Council have concerns that 45 houses are too many in a small village and would disproportionately add to the population. The school is close to capacity, how would a new classroom be financed? Affordable housing is a nebulous term and is open to the developer. Concern over the visual aspect and preserving the integrity of the village. The roads are already congested and dangerous. Concern that upgrading infrastructure would be in the hands of the developers. Strong reservations about whether the general infrastructure in the Suffolk Coastal area could cope with increased population without significant input. The Parish Council would wish to see significantly fewer than 45 units on the site and be closely involved in the process. Affordable housing should be modestly priced housing for young people.

### Other organisations

Suffolk County Council AONB Team comment that there should be a need for a Landscape and Visual Impact Assessment to assess impacts on the AONB and to inform landscaping proposals. Bullet point (f) should be amended to include a reference to consider lighting.

RSPB comment that the requirement in the text for Habitats Regulations Assessment should be carried through into the policy.

### **Developers/Landowners**

Robinson, Peter supports the allocation and confirms the availability and suitability of the land. The Draft Strategic Housing and Employment Land Availability Assessment and site assessments have correctly identified the most preferable location for development in Eyke. The draft policy broadly meets the landowner's expectations. With local connections, that landowner has every intention of bringing forward the site in a positive way and delivering the social benefits the Council has identified. However, there are concerns that some requirements are too prescriptive or may undermine viability. It is unclear how it has been determined that 0.4ha is an appropriately sized for the school expansion and why 5 self build plots are required. Our client can make direct contact with the school regarding their requirements and it would be helpful to understand how many individuals on the self-build register have sought plots in the Eyke area. 5 dwellings out of 45 is considerably higher than Policy SCLP5.9 which specifies 5% on sites of 100 dwellings or more. Affordable housing should not be restricted to on-site provision.

The small number of affordable units (assuming half are ownership products) may not be attractive to a registered provider who are unlikely to manage many existing sites around Eyke. It is doubtful there is a need for 15 affordable dwellings in Eyke and therefore an off-site contribution may be more appropriate. A mixture of on-site and off-site provision should be allowed.

The viability is affected by the school expansion, self-build and affordable housing and therefore there should be no further contribution required towards education. The allocation is unnecessarily prescriptive. Allocation of a small amount of land on the other side of The Street would help to offset viability issues.

A housing trajectory will need to be prepared in due course to support an Examination in Public. Additional evidence can be provided to confirm that his site would contribute wholly to the District's five-year housing land supply. Due to its size, the site is likely to be able to deliver all 45 units within 5 years regardless of whether an application is prepared in outline form or in full. It is noted the draft SHELAA estimates a commencement date of 2020/21. It is confirmed that this is sensible and could be brought forward if necessary.

### **Members of the Public**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

Concerns regarding highways impacts are noted and the advice of Suffolk County Council has been incorporated into the policy in this respect, including in relation to footway improvements, widening of the car park access and the provision of a school drop off area.

In taking the allocation forward, regard has been had to the revised National Planning Policy Framework in terms of the emphasis on making efficient use of land. It is considered that there is scope to achieve a greater number of dwellings on the site than proposed in the First Draft Local Plan. This is alongside the provision of landscaping and a design and layout informed through landscape and visual impact assessment recognising the site's location in the Area of Outstanding Natural Beauty. The number of dwellings would be more closely aligned to the numbers proposed elsewhere in the District taking into account the size of the site, allowing for open space, and area for expansion of the school and land for parking.

The area of 0.4ha for school expansion would enable the school to expand to a 210 space school (an increase of 70 spaces above current capacity). The development of this site will provide for this benefit to be achieved.

A housing trajectory is included in the Appendices of the Plan.

## Policy SCLP12.48 Land to the west of Ipswich Road, Grundisburgh

Total comments	Support	Object	Observation
48	3	41	4

### Statutory Consultees

Suffolk County Council comment that a pedestrian crossing is required on Ipswich Road.

Suffolk County Council comment that Grundisburgh Primary School is forecast to have sufficient capacity to accept the pupils emanating from this development.

Suffolk County Council comment that additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Grundisburgh and Culpho Parish Council object to the development. They comment that the site is grade 3 agricultural land. It is in open countryside, open on 4 sides. Any building on the site would be intrusive ribbon development in the countryside. Elm Tree Farm Lane is a very effective boundary between the built up area of the village and the open countryside.

The Landscape Character Assessment states that in this area future expansion of any villages is to be planned carefully to retain character and settlement patterns. Reference is made to The East Suffolk County Council Policy Statement Planning Proposals & Conservation Area Appraisal April 1972 Grundisburgh which stated that that all future development in Grundisburgh should be contained within the long curve made by the Ipswich and Woodbridge Roads. No new development has taken place north of the village centre or east of Woodbridge Road. All the development that has taken place in the village west of Ipswich Road since 1972 has been on exception sites. The New Village Hall site Felgate Way was an enabling development. Only 1 and 2 Gurdon Road can be seen from the main road through the village. New development has been contained so that the historic centre and conservation area are dominant features of the village which remain in the mind of residents and visitors alike. Grundisburgh is unusual in that it has an historic centre and very little ribbon development.

There are several sites within the existing physical limits boundary with a presumption in favour of development which could become available for residential development, as has happened in the last eight years.

The valuable historic village centre can not be expanded to accommodate the number of vehicles and people who wish to use it now. More residential development would put more pressure on the heart of the village and does not mean facilities would be supported in fact history shows quite the opposite. In 1980 there were more services. More than 200 properties have been built since then.

All Large villages with a score of 20 or less have much lower populations than Grundisburgh most only half the size. Logically those villages could benefit from a modest increase in housing and

population which might increase their sustainability. New development is not necessary in Grundisburgh to maintain or improve services. There are 40 organisations in the village ranging from Baby Café, Toddler Group, scouts and guides, youth club to history society, luncheon club, bridge club and a local quarterly newspaper serving 18 villages.

Grundisburgh is unusual in the district in that there is a reasonable mix of housing types and tenure. Of the 657 dwellings in Grundisburgh 20% are Housing Association rented or shared equity, a third of those are reserved for local people. Of the 657 dwellings in Grundisburgh 13 are flats and 251 are bungalows.

Concerns are raised over infrastructure. There are drainage and flooding issues. Recently power cuts have been experienced more frequently and internet connection is very slow.

The village centre though recognised for its traditional appearance and atmosphere has kept pace with innovation. A listed Victorian school converted into flats for the elderly, the listed church dating back to C13 with photo voltaic cells on the roof, the village green with stream running through the middle, the convenience store now with post office, the coffee shop/emporium, the pub/restaurant with bowls club at the rear are the envy of many villages in Suffolk Coastal.

No new development should be scheduled for Grundisburgh in the new Draft Local Plan.

### **Other organisations**

Suffolk Preservation Society objects as the site is prominent and on rising ground. The development would introduce a damaging urbanised character to the landscape and would be highly visible and overbearing on entering the village on Ipswich Road from the south and in long views from the village. The approach to the village from the south is characterised by treed screening of Grundisburgh Hall Park and Garden to the east and open far reaching views across agricultural land to the west. Further encroachment of development into this landscape will be highly damaging.

### **Developers/Landowners**

Hopkins Homes Ltd support the policy. The plan will be Examined against the 2018 NPPF. The site is well served with public transport, with bus stops close to the site. Hopkins do not support the requirement for 5 plots to be for self build. This conflicts with policy SCLP5.9 which only requires 5%. It pays no consideration to need for self build.

### **Members of the Public**

#### Support:

Support provided there are sufficient affordable homes.

A shop is needed in this part of the village.

#### Object:

#### Transport and Access

A number of respondents raised concerns in relation to roads and traffic including that roads cannot accommodate more traffic, Ipswich Road is narrow and there is a blind spot on the brow of the hill, the roads are narrow and many don't have pavements and cars park on the side of the road. It is commented that Ipswich Road is used by vehicles associated with the wind farm energy supply, and that there is concern over additional construction vehicles. Concerned about extra cars on Grundisburgh Road.

It is also commented that roads to Woodbridge and Ipswich are unsuitable and that there are issues with roads in Culpho having no path and speeding vehicles. Routes to Ipswich are inadequate.

Elderly accommodation would increase need for traffic for carers.

It is commented that there is no Travel Plan, Traffic Statement or Transport Assessment planned.

Respondents comment that it will add to parking and traffic problems in the centre of the village. Cars would be needed to access village services. Respondents comment that traffic is an issue on Rose Hill due to parked cars and speeding.

It is commented that the roads are unsuitable for commuting and a lack of employment will mean more people commuting for work.

The Ipswich northern bypass will affect transport infrastructure demands.

Concern is raised over safety in that Gull Lane is used by cyclists, walkers and horse riders, which may become dangerous. It is commented that new development has made Ipswich Road more dangerous.

It is commented that access to the site is poor.

It is commented that there will be a need to include cycle lanes and restrict HGVs.

Respondents comment that the bus service is sparse (x2), so new residents would require cars. However, it is suggested that the proposed density may preclude sufficient parking and residents of affordable housing and first time buyers may not have vehicles.

### Infrastructure and services

A number of respondents raise concerns over infrastructure capacity, including concern that infrastructure has not been considered.

A number of respondents comment on utilities capacity including that there are often burst water mains and electricity failures in the village, that underground services are at their limit, drainage is problematic, Internet connection is not good and has reduced in speed since recent developments. Internet provision is not good, the sewerage and water systems already have difficulty coping. It is commented that the site makes no provision for improved broadband, mobile or radio signal.

Respondents comment that there will be pressure on existing facilities, which are not expanded when development takes place. It is commented that there are fewer services than in 1980, despite an extra 200 properties.

A number of respondents comment in relation to infrastructure provision including that the doctors surgery and school are over subscribed. It is commented that class sizes have been increased. Respondents comment that a new surgery is not needed, there is a shortage of doctors and it is not open full time. It is not clear where additional space for the surgery would be provided and the contribution seems inadequate. It is commented that the school should not be expanded as this would result in loss of playing field.

Infrastructure requirements should be reviewed by a minister before the plan is Examined.

### Services and facilities

Respondents comment that existing facilities would not readily support an expansion on the scale proposed and that the shops and pub are already sustainable and new housing is not needed to support them. It is unlikely that new facilities would be created.

It is commented that distance to services affect quality of life.

There are no fewer facilities than previously. Unlikely that more facilities would be created.

Respondents comment that there is no employment.

Live in the village because of the balance between residents and facilities.

There are no facilities in this part of the village, and the site would not be suitable for elderly accommodation.

There are currently 40 organisations in the village, new development is not necessary to support these.

Respondents comment that the proposal is at odds with the settlement hierarchy, due to limited services available in Grundisburgh compared to population size. Other large villages with smaller populations could take more development, such as Nacton.

Consideration should be given to the impact the development would have on the stretched and limited services in Grundisburgh.

### Landscape

A large number of respondents raise concern in relation to the impact on the landscape, including that the site /proposed development is prominent /incongruous, the site is in a Special Landscape Area, the site is open countryside on four sides, there would be an impact on character, the site is important to the northern edge of Ipswich and the setting of villages, the landscape comprises longer views over arable land and contained views, future extension of villages should carefully retain character and settlement patterns, Gull Lane should be the boundary of the village / Elm Tree Farm Lane is a natural boundary, the development would extend beyond the natural boundary of the village and rural areas should be kept natural. Respondents are concerned it would lead to ribbon development and urban sprawl.

Previous developments within the village have been achieved without destroying the essence of the village.

Respondents make reference to the Landscape Character Assessment which suggests the landscape on this part of the village would be sensitive to new development.

It is commented that it is contrary to policies SCLP3.4, SCLP10.4 and SCLP5.11.

It is commented that new development should be in character with the village.

There are views over the site from the footpath which is part of the village millennium walk.

There is concern that landscaping would not be applied / enforced.

### Heritage

Respondents have commented that the development will impact on the historic village / traditional character and rural heritage. It will have a negative effect on the attractiveness of the village. It is a village nestled in a valley. Reference is made to the 1972 East Suffolk County Council Conservation Area Appraisal states that no further development should be allowed north of the village centre, east of Woodbridge Road or west of Ipswich Road. Previous development appears 'contained' in the landscape. The historic core of the village cannot be expected to accommodate the number of people and vehicles who wish to use it. It is an ancient, country scene characteristic of Grundisburgh.

It is commented that the village has kept pace with innovation e.g. conversion of listed Victorian school into flats for the elderly, photovoltaics on the roof of the church.

The individuality of villages is being lost.

There is a Conservation Area for a reason.

Respondents comment that development would damage the landscape and Grundisburgh Hall Park and Garden.

Development cannot comply with criterion d of the policy.

This area of Grundisburgh has a heritage history.

### Loss of Agricultural Land

A number of respondents raise concern over the loss of agricultural land, including that this will be even more important once Britain leaves the EU.

Respondents comment that the site is greenfield.

It is commented that development would be contrary to SCLP8.2 as involves the loss of open space.

### Biodiversity

Species on the site include owls, buzzards, kestrels, badgers and others. Rare, endangered species will die out.

Query whether wildlife has been considered. An uncommon raptor, a Hobby, migrates to nest in the wood on the south side of this field and hunts over this farmland.

### Settlement boundary

A number of respondents comment that the site is outside of the Settlement Boundary and that the inclusion of the site has only been made possible by moving the settlement boundary. It is commented that the Parish Council has not been consulted on moving the Settlement Boundary. Development of the site would be in the countryside and not accord with SCLP3.3.

Respondents comment that the site is not well related to / not in keeping with the village.

It is commented that the site is outside of the existing village.

### Alternatives

Respondents comment that there are areas of land within the village that could be developed, development on smaller sites would have less impact on the village and there are brownfield sites elsewhere in the District that could be developed e.g. Bentwaters, Debach, Police HQ at Martlesham, Grange Farm and MOD Woodbridge. There are more suitable sites in towns.

Development should go elsewhere. There are enough sites in the District to deliver in excess of the housing requirement.

A part of the land opposite the Baptist Chapel on Meeting Lane (site 351) would be a better location, being part of the village close to the education facility and nearer to the centre for shops and public house. It would also involve some loss of agricultural land and access may be an issue.

Alternative sites are far less intrusive. Site 351 would be more suitable, and access could be improved as it is all Estate land.

Brownfield sites should be developed.

### Housing need

It is commented that the houses will be unaffordable to young people in the village. It is also commented that the site would have some merit if for affordable housing, and concern that development would not be for affordable houses.

Respondents comment that there is a good mix of housing types and tenures already in the village.

Respondents comment that there is no need for housing in the village.

Concerns over placing facilities for the elderly outside of the village.

A smaller number and windfall is appropriate as 45 have been built. Villages should grow organically on small sites with design of the local vernacular. Small sites exist within the settlement boundary.

### Other issues

Respondents comment that granting of the permission in Felgate Way to the north of the site was an exception / enabling development. Respondents comment that the village hall has not been built yet / may never be built. The need for a village hall has been flagged since 1972. The development at Felgate Way should not be used as a reason to permit more development. The houses built on

Foundry Place have taken away the village feel. Prior to Felgate Way the village had retained its historic character and wildlife haven. Respondents comment that the Council made statements during the planning process for the Felgate Way site that the site would not be used to justify further development in the village.

Respondents comment that there should be no new development / housing in Grundisburgh and that Grundisburgh has already had development of 45 dwellings since 2010.

Respondents comment that the stream across the Green silts up more regularly since the building of Alice Driver Road and Felgate Way.

It is commented that the proposal would make the village a less inviting place for people to live in.

It is understood that Councillors object to the proposal.

There has been no prior engagement or consultation with the Parish Council.

Those who live a village choose to do so because they do not wish to have lots of new development. New development will endanger the rural way of life.

There is a strong sense of community.

It is commented that there is already an agreed local plan. A previous Local Plan indicated that no residential development was necessary and since then 45 properties have been built. It is commented that residents have been informed previously of no intention to build on the area covered by proposal SCLP12.48.

Concern raised that the site has been included in an underhand way, contrary to the SHELAA methodology and the Issues and Options document. It was not available to comment on in the Issues and Options document.

The site is contrary to Sustainability Objectives 8 (Material Assets), 13 (Biodiversity), 15 (Landscape) and 18 (Travel and Access). It goes against the Local Plan's recommendations for sustainable development.

Support the agreement of the Parish Council to oppose any residential development and any extension to the Settlement Boundary.

Concern that permissions are modified due to viability.

Concern over disruption during construction.

Had been informed that Grundisburgh Estate could not sell this land.

Local opinion should not be ignored. There has been no consultation with the Parish Council or residents. There has only been limited time to comment.

Support the comments submitted by the Parish Council.

The difference between policy and paragraph numbers is not easily distinguishable.

Observation:

It is suggested the site could include a shop.

**How these comments have been taken into account in the Final Draft Local Plan:**

Supporting text and policy wording concerning pedestrian connectivity and access allow for due consideration to be given to the feasibility of a level crossing.

A single site is allocated in the plan to allow the village some capacity to evolve over the plan period which is to 2036.

The scale of development and policy requirement for open space provision within the site together with other policy criteria and design policies in the plan ensure respect to the setting of the site in relation to its surroundings.

The site allocation policy requirements are based on supporting viability evidence that they can be delivered.

The plan preparation has been a positive iterative process and this applies to supporting Strategic Housing and Employment Land Availability Assessment evidence concerning the availability and suitability of potential sites to consider for allocation.

## Policy SCLP12.49 Land south of Ambleside, Main Road, Kelsale cum Carlton

Total comments	Support	Object	Observation
5	0	0	5

### Statutory Consultees

Suffolk County Council suggest referring to the Highway Authority response to application ref DC/18/2621/FUL, with specific regard to access visibility and a pedestrian crossing facility.

Suffolk County Council comment that Kelsale Primary School is expected to exceed capacity during the plan period, however some further expansion may be possible on the school's existing site. The County may decide to require further places at the proposed South Saxmundham Garden Neighbourhood primary school. There is sufficient capacity at the catchment secondary schools to accommodate the number of pupils expected to emanate from development of the site.

### Parish and Town Councils

Kelsale cum Carlton Parish Council raise concerns over the unmonitored impact Carlton Meres Campsite is having on the facilities in the village and that they believe occupants to be living permanently on the site, in contravention of the planning conditions applied to the campsite development. The Parish also raised concerns as to the increase of HGV and LGV traffic to and from Carlton Meres. The Parish Council state that Kelsale CEVP School has had successive expansion including an extension over the summer of 2018.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Observation:

A member of the public required confirmation that this site was carried forward.

Kelsale cum Carlton Primary School has expanded over recent years to cater for increased demand. It is uncertain whether the school will be able to continue expanding.

### How these comments have been taken into account in the Final Draft Local Plan:

Included in the policy is reference to criteria for safe vehicular access in and out of the site and safe pedestrian access in the form of a pedestrian crossing facility and footway enhancements, as detailed in the Infrastructure Delivery Framework.

Infrastructure requirements have been included alongside the policy, based upon the Council's evidence and engagement with infrastructure providers .

Kelsale cum Carlton Parish Council are in the early stages of producing such a Neighbourhood Plan, in which actions can be taken to address some of the issues most relevant to the local population, including concerns regarding Carlton Meres caravan site if deemed a suitable community issue. Enforcement action is being processed in relation to Carlton Meres caravan site by the District Council.

## Policy SCLP12.50 Land north of The Street, Kettleburgh

Total comments	Support	Object	Observation
20	2	14	4

### Statutory Consultees

Suffolk County Council comment that the requirement to provide adequate visibility splays in order to gain safe access to the site conflicts with criteria d) of the policy. Based on expected primary school aged pupils emanating from this site, and another in the catchment, it is not clear Easton Primary School can expand to meet the expected demand. As the site is not within safe walking distance to a school further discussions will be needed to discuss these allocations before the County can support them. Thomas Mills High School is expected to exceed capacity during the pan period. The County will advise SCDC as to the additional land requirements of potential future expansion.

### Parish and Town Councils

Kettleburgh Parish Council object to development of the proposed site allocation, and have based their decision on a number of reasons including the following; the objections of Kettleburgh residents to development of the proposed site allocation, concerns of development exacerbating flood risk, capacity issues at Framlingham Water Treatment Works and the Kettleburgh Pumping Station, the scoring of Kettleburgh as a 'small village' in the Settlement Hierarchy and the belief that the village would more accurately be understood as 'countryside', particularly the scoring for playing facilities for young people and children, the scoring in relation to the limited bus service, the scoring in relation to the limited community facilities such as church and community hall, the increase in traffic resulting from residential development, and the conflict between the site allocation policy objective of retaining the hedgerow along The Street and provision of a safe footpath.

The Chairmen of Brandeston, Kettleburgh and Easton Parish Councils object to the proposed site allocation due to the cumulative impacts on the transport infrastructure associated with the added vehicle movements from new residents. It is suggested the proposed level of development proposed in the three parishes is incompatible with Policy SCLP7.1 Sustainable Transport. Furthermore, increased development in the aforementioned rural settlements will only increase reliance on private vehicles and hence reduce air quality in the settlements an along the transport corridors.

Easton Parish Council object to the proposed site allocation due to the suggestion the road system in the surrounding area cannot cope with the increase in vehicles as a result of development of this site allocation and that in Brandeston. The Parish Council also state the suggested number of dwellings delivered in the parishes of Easton, Kettleburgh and Brandeston should be lowered due to the limited road network in the area and inevitable increase in the use of the private car, an unsustainable mode of transport.

### Other organisations

Suffolk Wildlife Trust recommend requiring ecological assessments in the policy in order to give scrutiny to the level of biodiversity and wildlife habitats on the site.

## Developers/Landowners

Harry Moore supports the proposed site allocation and has promoted the sites continued availability for residential development. Of the policy requirements, the landowner emphasise their support for development that is in keeping with the village's local character and that retains and enhances the village sign. They raise two changes to the policy they would like to see the addition of 'with further development to the rear' to criterion a), and the addition of 'wherever possible and except in the location required to provide vehicular access' to criterion d). The landowner would be happy to submit a planning application within a reasonable period of time after the allocation is confirmed.

## Members of the Public

### Object:

A number of respondents comment that it represents too much development for the scale of Kettleburgh and the density is too high.

Respondents comment on the impact on local character including that the gap between buildings in the heart of the village contributes to the village's attractive local character and appearance, any development beyond the current line of houses fronting the road would be out of character and impact the river valley landscape.

Respondents comment that retention of the hedgerows fronting The Street would make accessing the site difficult and the provision of a public footpath difficult and result in narrowing the road.

Respondents comment that development will be detrimental to wildlife habitats and there is a suggestion that a full wildlife impact assessment is undertaken due to the potential loss of wildlife habitat resulting from development.

Respondents comment that soakaways will be needed on site and that there is flood risk due to impermeable surfaces of development on the site.

It is commented that there is no footpath fronting the site.

A number of respondents raise concerns over in Increased traffic.

A number of respondents raise concerns over pressure on school places and pre-school places.

It is commented that it is necessary to travel to Framlingham or Wickham Market to reach adequate facilities.

Respondents comment that there would be pressure on medical facilities.

Respondents comment that there would be pressure on sewerage infrastructure.

Respondents query whether Kettleburgh needs more housing and how will it be guaranteed that the houses will not be sold as second homes.

It is commented that development should be sympathetic to both the existing built and natural environments.

Respondents suggest that housing growth should be focused near employment areas, sites 245 and 74 would be preferable and housing would be more affordable if placed closer to Ipswich.

Respondents comment that the Settlement Hierarchy scoring is deliberately inaccurate to acquire more settlements as small villages and hence more sites for allocation.

**How these comments have been taken into account in the Final Draft Local Plan:**

The issue regarding the retention of hedgerows along the road frontage and the provision of safe access, particularly visibility splays, has been resolved. Where part of the hedgerow is required to be removed for highways reasons it must be replanted elsewhere on site.

The site lies within Flood Zone 1 with no recorded issues of surface water flooding, as demonstrated through the Strategic Housing and Employment Land Availability Assessment process.

Reference is included in relation to water infrastructure requirements.

The settlement hierarchy has been recently reviewed, within which Kettleburgh has been identified as a 'small village'. As such Kettleburgh has a number of services and facilities that create a relatively sustainable location for a modest scale of residential development. In this regard, the site allocation in the heart of the village will deliver a well designed scheme bringing the village sign into proper use as a focal point of the village, thereby enhancing settlement identity. The linear nature of development on the north west side of The Street in contrast to the undeveloped south east side of The Street is considered an attractive village form, which the allocation seeks to enhance.

It is acknowledged the allocation of development sites in rural settlements across the district such as Kettleburgh will result in greater use of the private car as the primary mode of transport. However, doing so enables the smaller communities in the rural areas of the district to be sustained.

The scale of growth proposed in Kettleburgh will not result in the overcapacity of the local highway network, as evidenced in the transport modelling of the Local Plan evidence base.

Reference has been made in the policy text to the need to conduct a biodiversity assessment in order to assess the extent of any impacts from development on the biodiversity of the site and surrounding areas.

The density of the site equates to 21 dwellings per hectare, which is considered an appropriate density in the local context of Kettleburgh.

Infrastructure requirements have been included alongside the policy based on the Council's evidence.

## Policy SCLP12.51 Land to the rear of 31-37 Bucklesham Road, Kirton

Total comments	Support	Object	Observation
56	1	49	6

### Statutory Consultees

Suffolk County Council - Highways requirement to provide pedestrian crossing point and likely change to layby layout to delineate access from layby and enable required visibility splays.

Suffolk County Council - School provision required and explored at Felixstowe Garden Neighbourhood, the Trimley villages and to some extent Brightwell Lakes in relation to capacity at Felixstowe Academy..

### Parish and Town Councils

Kirton & Falkenham Parish Council - Cumulative impacts to winding Bucklesham Road and the wider village that is characterised by narrow lane, limited footways and on street parking issues. No footways access. Potential vehicle access to winding section of Bucklesham Road. No footways access, site is next to a layby which may create visibility issues. Significant existing provision for market, affordable and private rented homes for a rural village and relative to other rural villages. The site plan in the Draft Local Plan is inaccurate in that it includes land not owned by the landowner offering the site for development.

### Other organisations

None received

### Developers/Landowners

Kirton Estate Trustees - Criteria (e) of Policy SCLP12.42 should be amended to require the appropriate provision of affordable housing in line with the thresholds contained in national planning policy and Local Plan Policy SCLP5.10. Support the policy and confirm that issues identified including surface water flooding can be addressed.

### Members of the Public

Much of the public feedback objecting to this site by taking issue with the cumulative growth at Kirton and the Trimley Villages. Development will exacerbate the existing infrastructure problem of poor roads because residents need to travel to other settlements for services. Kirton is a dormitory village necessitating car travel to other settlements for even basic goods and services.

The other most common point of feedback is poor visibility for site vehicle access. The narrow entrance to the site is on the inside of a bend, with little visibility of oncoming traffic (often speeding) in both directions and inadequate sight-stopping distance.

Several responses identified a long standing sewerage and surface water flooding issue and questioned whether this could be mitigated.

Concern about loss of green space and biodiversity will suffer from the removal of this particular site which is a haven for wildlife. Stag beetles, bats and raptors have all been spotted in this area recently.

With the nearest primary provision destined to be on the other side of the A14, it will not be within reasonable walking distance of the new school. With no footpath on the side of the road where the access will be situated, so residents will need to cross the road with their children, on a busy winding Bucklesham Road.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Kirton is identified as a Small Village based on provision of services and facilities.

The modest scale of this allocation in Kirton reflects feedback concerning reliance on services in other settlements.

Ongoing engagement with SCC highways demonstrates that a vehicle access can be achieved for the scale of the allocation. The site boundary has been amended to reflect the site put forward. The policy includes provision for a pedestrian crossing point. The supporting text to the policy states that improvements may be needed to the layby to the south of the site to facilitate access and a pedestrian crossing point will be required.

The policy requires provision of a mix of housing, including affordable housing on the site to contribute towards evidence of need for the District.

The policy includes contribution to provision of primary school places as set out in the supporting Infrastructure Delivery Framework. Infrastructure requirements have been included alongside the policy based on the Council's evidence.

The site constitutes a modest scale of growth in a rounding off of the village. The policy reflects that the site is screened and contained by site boundary trees and hedges and requires retention of trees and hedgerows on boundaries of the site wherever possible.

The supporting text to the policy states that surface water flooding is recorded in the south east corner of the site. Any development in this area of the site will need to demonstrate mitigation measures designed to alleviate the potential surface water flooding risks.

The policy and supporting text set out that evidence will be required to demonstrate how sewerage and water infrastructure capacity will be made available in time to serve the proposed development.

Contributions to health facilities are identified alongside the policy.

## Policy SCLP12.52 Land adjacent Levington Park, Bridge Road, Levington

Total comments	Support	Object	Observation
7	0	1	6

### Statutory Consultees

Suffolk County Council comment that potential access point is close to inside of a bend so work to site frontage likely required to form visibility splays and adequate pedestrian provision and a crossing point to the opposite footway.

Suffolk County Council comment that Nacton Primary School is currently forecast to have sufficient capacity to accept the additional demand emanating from this development.

Suffolk County Council comment that Additional secondary school demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Levington & Stratton Hall Parish Council object and raise concern about whether the density of new housing proposed would reflect the existing village character. Impacts on village heritage including Red House Walk that is of significant architectural interest. Not enough land to support a development of 20 dwellings which, even if there was, would be completely out of character for the village, but a linear development of much smaller proportion may be more appropriate. Understand that the existing sewerage system is at capacity [see also DLP comments on Levington Park] and there are road flooding problems along this section of Bridge Road which SCC Highways are yet to resolve.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

There would not be an estate type development with high density housing, several deep on the site, but instead housing spread along the road frontage at an appropriate building line distance from the road (hopefully similar to Red House Walk which is directly opposite). The number of dwellings on the site should therefore be reviewed.

**How these comments have been taken into account in the Final Draft Local Plan:**

Amended policy and supporting text wording reflects pedestrian provision, education and highways feedback.

The scale, nature and design of housing development is to reflect and be similar to the existing housing on the other side of Bridge Road, and is considered to be at an appropriate, deliverable density.

## Policy SCLP12.53 Land north of Mill Close, Orford

Total comments	Support	Object	Observation
31	0	12	19

### Statutory Consultees

Suffolk County Council comment that an extension of footway on Ipswich Road to site access is required.

Suffolk County Council comment that Orford Primary School is forecast to have sufficient capacity to accept the additional demand emanating from this development. In relation to secondary education additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Orford and Gedgrave Parish Council object on the basis that many residents are concerned over the Local Plan and the prospect of another influx of second homes owners. There are currently at least 40% second homes / holiday homes. Adding to this number will make it unviable as a long term and full time place of residence. There are real issues with maintaining services and pressure on infrastructure. An increase in medium to high value homes will only compound these problems. Reconsider the impact that such houses will have on the community. There is a real need for affordable housing.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Object:

Object to the allocation (*with no further comment*).

A large number of respondents have commented on the number of second homes and holiday lets in the village and that there is a need for affordable housing and housing which would result in permanent residents in the village. Permanent residents would help to support the school, businesses and services, particularly in the winter. It is suggested that a restriction should be applied to ensure that any homes are for local families / permanent residents. It is commented that there is a lack of affordable housing for workers and that teachers cannot afford to live here. It is commented that new houses should not be large, detached houses. Concern that 'high quality' means the types of homes that become second homes.

A number of respondents comment that local knowledge suggests the real figure of holiday homes in Orford is 37%/50%/40%/50%, not 25%.

It is commented that many young people in Orford could not afford affordable housing which may explain a lack of demand.

It is commented that the need to build new homes needs to be balanced against the needs of the village.

It is commented that young people need help in applying for affordable housing.

Concern that 'high quality' means the types of homes that become second homes.

Concern that new development is for outsiders with influence.

Respondents also comment that there is only a small need for affordable housing and that infilling would be a good alternative. It is commented that the development should be supported by strongly evidenced housing need given the sensitivity of the location.

It is commented that there are difficulties purchasing a house in Orford where a mortgage is required.

It is also commented that there is no need for the housing. Housing demand can be better met in larger, urban areas. Other developments are not selling.

Affordable housing should be developed where the demand is.

Infill for low cost housing would be better.

Housing demand can be better met nearer to well serviced larger urban areas.

It is commented that holiday lets should not be registered as a business as they avoid Council Tax and Business Rates.

A number of respondents comment on concern over support for local services including that some children attend private schools, there is a lack of community and social character outside of the summer and the number of pupils in the school has declined over the past 15 years. Concerned about losing the community which is vital to elderly residents, parents and children. The village shop has moved and is smaller. The bakers provides mostly for tourists. Shops for local residents are therefore reduced in scope.

There is concern that the village will be turned into a small town with estates which stand empty many months of the year.

It is commented that there is a lack of employment in Orford. The tourist economy is serviced by seasonal, part time and low paid. The tourist jobs are serviced by those who commute in. Trades vans travel from further afield. Young people with skills have moved away or live with parents and work elsewhere.

It is commented that there is no regular bus service to and from the village.

Respondents raise concern over impact on the landscape and the AONB, including that the proposal will detract from the rural appearance of Orford, the proposed development is too big and will create a suburban character. There is concern over the quality of design in the gateway to Orford and that the site is the first thing you see as you drive into the village.

Respondents also comment that views of the castle will be obstructed / impacted.

Concern is also raised that the visual impact will affect tourism and that the character of Orford as a tourist attraction should be retained to support the local economy.

It is commented that access to the school was not provided with the Mill Close development.

Respondents comment the sewage treatment plant is operating at full capacity and will be affected by risk of tidal surge flooding from the River Ore.

Concern is raised in relation to the number of visitors and that there are too many cars parked.

Concern over impact on the heritage coast.

Orford should only grow with sensitive management.

Concern that an industrial development may follow.

It is commented that the Council should weigh up the impact on the beautiful village against the extra revenue the Council would receive in Council Tax.

The proposal is contrary to paragraph 3.36 in the Settlement Hierarchy section of the Plan.

Respondents commented that the site notice was not clearly displayed and parts were too small to read.

Observation:

Future development should meet the needs of the local population in Orford.

Respondents comment that there are too many second homes and holiday homes. There are too many homes that stand empty in winter months.

A number of respondents would welcome new residents who are full time and contribute to the sustainable future of the village and there should be a requirement for the majority of / all new homes to be available to permanent residents. Housing should be truly affordable to those who work in and around the village.

Concern that new homes sold at market value would become second homes or holiday homes.

Orford is expensive and local families do not stand much chance of renting or buying here.

There should be more housing for first time buyers.

Council houses should not be bought to be rented out or profit from.

There should be more smaller houses for rent.

The increase in holiday homes impacts the Estate as there are few people to maintain and manage it as there are fewer volunteers.

The ageing full time population is becoming constantly depleted.

It is commented that new housing in excess of that needed for local people will result in more traffic commuting on the Woodbridge Road.

New housing should focus on provision of services e.g. keeping the shop, school and surgery open. . To keep Orford vibrant it is essential that people who want to live and work here can do.

There have been local changes since the site was allocated in 2017.

Facilities for families are reduced. The shop has moved and is very small. The bakers mainly supplies visitors and tourists.

The development criteria will be difficult or impossible to comply with. It will damage the landscape and obstruct views of the castle. English Heritage objected to the Mill Close scheme because it would have obstructed views of the castle from Ipswich Road.

The site is within the setting of Grade I Listed Orford Castle, which has not been assessed. The Castle and the tower of St Bartholomews Church are significant landmarks from all directions due to their height and flat landscape and smaller buildings below.

There is no character assessment to support the requirement for a 'gateway'. Query whether it would always be a gateway.

A grass track instead of footpath was provided at Mill Close.

The entrance would be a traffic hazard.

The site has been allocated prior to consideration of whether development would be appropriate.

The road is called Ipswich Road, not Sudbourne Road.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The allocation is an existing allocation carried forward from the Site Allocations and Area Specific Policies DPD.

Change has been made to the housing mix and gateway situation wording in the policy, to reflect the comments made. This reflects the concerns over the affordability and size of housing in the village. This may also assist in relation to comments around declining services in the village.

Infrastructure requirements are included alongside the policy, informed by the Council's evidence base.

Amendments have been made to the reference to the amount of homes being used as second homes and holiday homes, to emphasise that this is a relatively significant proportion.

Suffolk County Council have been consulted in relation to access and transport and the policy

contains a requirement in relation to footpath access.

## Policy SCLP12.54 Land bounded by Helmingham Road and Ipswich Road, Otley

Total comments	Support	Object	Observation
22	1	17	4

### Statutory Consultees

Suffolk County Council comment that a connection and crossing point to existing footways is required. Access point is over a large ditch so a culvert may require approval of the local flood authority. Highways requirement to remove hedgerows to provide required visibility splays and footway connectivity conflicts with point C of the draft policy. Unclear whether a continuous footway could be provided from the existing footway on the B1079 Helmingham Road.

Suffolk County Council comment that Otley Primary School is not forecast to have sufficient capacity to accept these pupils. It is envisaged that expansion would be needed to manage this growth, and it is expected that expansion could take place on site. In relation to Farlingaye High School, additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Otley Parish Council, on behalf of the village are unable to support the preferred sites. The sites are on the edge of the village rather than creating a core 'hub'. 68% of residents are against development on this site. It provides beautiful greenery as a meadow, spring flowers and grazing for sheep. This is reflected in policy in SCLP10.1.

Additional traffic on Helmingham Road would exacerbate concerns of speeding traffic which is reflected in reports gathered by speedwatch volunteers. There would therefore be a adverse impact on transport networks (ref policy SCLP7.1g).

### Other organisations

Suffolk Preservation Society considers that this site does not relate well to the built form of the village. The built up area of the village is south and is characterised by a linear pattern of individual houses in large plots to the west of Helmingham road which ends at Ipswich Road. Listed Otley House lies to the east. Ipswich Road forms the natural edge to the village.

### Developers/Landowners

None received

### Members of the Public

Object:

The site was rejected in the previous plan.

There is no need for the development. There is no need for the sites on the basis that the Inspector for the Bell Lane inquiry considered that there is sufficient development land for the next few years.

Respondents comment that the site is outside of the Settlement Boundary.

Respondents comment that the site is in agricultural use and would result in loss of agricultural land.

Respondents raise concern over the visual impact of the development on the landscape and that this would appear as urban sprawl. The rural aspect and character of village would be severely damaged. The site is part of the view when entering the village. The site represents the northern limit of the built up area. The development of the site would harm the character and appearance of the area. The development would be isolated in the landscape. The Landscape Character Assessment describes the area as low key, quiet and unspoilt. It would harm the character of Ipswich Road. Removal of amenity trees would be needed to create a footpath which would urbanise this part of the village which is an important transition to the rural landscape. Visibility splays / removal of trees would harm the landscape

Respondents comment that the site represents ribbon development.

The site size and dwelling numbers indicate low density housing, it could deliver 40.

Cul de Sac development would not reflect the character of this part of Otley.

Respondents comment that the site is poorly related to the existing settlement and village centre and to services in the village.

The Sustainability Appraisal should score red or amber in relation landscape, townscape, open space, transport and roads and compatibility with neighbouring uses.

Concern regarding loss of views from existing residents.

A number of respondents comment that there are brownfield sites in the village which could be used, which are next to amenities, including the Hubbards site, the old garage site or the Soames land next to the school, which is closer to the village centre. There is an alternative site in the centre of Otley. Part of sites 3 and 4 (*On PC map*) would be better. The piggeries currently detracts visually and the site is adjacent the doctors and close to the school.

Respondents consider that development should be in the centre of the village to create a hub. The site is located far from services.

If the pub was developed it is likely that the land on the other side of Helmingham Road would come forward.

Sites on the edge of the village are not as suitable for the elderly in terms of accessing services, or for children to get to school. It is 300m – 400m to the bus stop, beyond the reach of the elderly or frail.

The proposals along with the former Hubbards site represent an increase of 80 houses in a village of 250 houses which will change the nature of the village.

The doctor's surgery is fully subscribed.

The shop and the pub struggle.

Respondents comment that drainage is a problem. The top of Ipswich Road floods in the winter. Water pressure in the village is poor. There are issues with capacity in the sewage system.

Concern is raised over adverse impact on residential amenity.

Respondents raise concern over the potential impact on highway safety including on Ipswich Road, Thompson's Lane and Gibraltar Road, the majority of which are single lane. Respondents comment that there is no footpath along Ipswich Road. It is commented that Ipswich Road and Gibraltar Road are quiet roads used as green lanes and are popular with cyclists, joggers, horse riders, dog walkers, families and school children. It is commented that access onto Ipswich Road would be dangerous.

The roads are congested. HGVs use the village as a short cut. There would be major disruption when Otley Hill is closed.

Respondents comment on the issue of speeding and comment that there should be a 20mph speed limit due to the number of accidents. There are speeding issues on the B1079.

There is no pavement. It would be a dangerous site for children.

There would be reliance on the car, as found by the Inspector in the appeal decision at Blue Barn Farm.

Respondents comment that there are no footpaths or lighting and the site is poorly connected to the village. There are no footpaths and development has been refused previously for this reason. The creation of a footpath would have an urbanising effect.

Concern is raised over landscape impact on the country lane from potential junction.

Concern over loss of hedgerows even with replacement / modification of hedgerows.

The density is unacceptable, and out of character with surrounding properties.

Respondents raise concern over potential adverse effect on setting of Grade II Listed Otley House, especially in autumn and winter. An Historic Impact Assessment was prepared by the Architectural History Practice in Jan 2018 – the house is of greater age and complexity that suggested in the list entry. Adaptations to hedgerows and removal of woodland would have a significant harmful impact on the setting of a Grade II listed building and the wider village.

A number of respondents comment that the site is an ancient meadow. Respondents comment that the site is a grazing meadow and is a habitat for wildlife including flowers, butterflies, birds, insects and hares. These meadows are rare in villages. Street lighting would disturb wildlife.

Respondents raise concerns over light pollution. It is commented that lighting would be unnecessary if the site was in the centre of the village.

There are issues relating to the speed of the internet.

A mix of housing of various sizes is needed, including affordable housing and housing for the elderly.

Concern that the proposal would lead to further future development on the remainder of the field.

The site has been selected because the land has been offered for development.

Query why the site is suitable when permission has been refused previously.

Query why allocate the whole site if it is not intended to develop the whole site.

Observation:

Comment states no objection.

No objection to site SCLP12.54, SCLP12.55 or to the Soames site being put forward by the Parish Council. However, consider 55 additional houses, plus the permission for 35 on the Hubbards site, is too high for Otley. This will have a detrimental effect on the character of the village and strain infrastructure. There are issues with water pressure in the Helmingham Road area. Traffic would increase substantial. An extra 20 or 30 houses should be the maximum.

**How these comments have been taken into account in the Final Draft Local Plan:**

The site allocation is removed from the Final Draft Local Plan in response to consultation feedback whereby it was suggested that a more centrally located site would be preferable. The Final Draft Local Plan identifies an alternative site adjacent Swiss Farm Cottage which is more centrally located in the village (policy SCLP12.59), for a similar level of growth for the large village of Otley to evolve over the plan period up to 2036.

Infrastructure requirements are incorporated alongside the policy, based upon the Council's evidence base and engagement with infrastructure providers.

## Policy SCLP12.55 Land at Chapel Road, Otley

Total comments	Support	Object	Observation
15	1	9	5

### Statutory Consultees

Suffolk County Council comment that extension of footway on Chapel Road to site access is required. Very likely that existing 30mph speed limit terminal will need to be relocated in a north easterly direction so that access visibility splays can be formed within site frontage. There are significant cost and time implications for the completion of this process.

Suffolk County Council comment that Otley Primary School is not forecast to have sufficient capacity to accept these pupils. It is envisaged that expansion would be needed to manage this growth, and it is expected that expansion could take place on site. Farlingaye High School - Additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Otley Parish Council object to the allocation. Residents do not look upon the site favourably due to being on the edge of the settlement boundary rather than creating a hub. Over 50% of respondents to the questionnaire stated that this site is not a preference. The site would not maintain or enhance the vitality of the rural community. Concern that the number of houses proposed would be increased. Residents of Newlands would have loss of outlook, loss of privacy, loss of sunlight resulting in negative impact on quality of life.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Support:

If needs be, it would just be an extension of the village boundary.

#### Object:

A number of respondents comment that housing should be developed in the centre of the village, for example between Otley House and the recently developed farmhouse next to the playing field or on brownfield sites. The approved development of the former Hubbards site is a good example of use of brownfield sites. The site is outside of the village and marks the limit of the built up area to

the east. Brownfield sites are next to the amenities. Development should be in the centre of the village to create a hub. The site makes no contribution to regeneration.

Respondents comment that the site is poorly related to services in the village and the Chapel Road area has no services. Sites on the edge of the village are not as suitable for the elderly in terms of accessing services, or for children to get to school. People will not be able to reach the facilities in the village without transport.

Part of sites 1163 and 771 would be better. The piggeries currently detracts visually and the site is adjacent the doctors and close to the school.

The site is a greenfield site.

Respondents comment that the development would harm the character and appearance of this approach to the village. It would elongate the village towards Otley Green. The site is outside of the village. It is commented that the Settlement Sensitivity Assessment describes the area as being sensitive to new development which results in the loss of the dispersed character of dwellings north of the settlement. The site is open and has long views across open plateau. Views out of the site include Grade II Otley Hall and Villa Farm. Any development on the sites would have a detrimental impact. Development would close the gap between Otley and Otley Green. The site provides a strong rural setting to the north of the village. Otley is currently absorbed by well vegetated margins. It will impact the sensitive claylands plateau by introducing development beyond the edge of the settlement and encroach on a sensitive landscape.

Respondents comment that the outlook of existing residents would be compromised, including those of Newlands.

The site is an ancient meadow. The site is habitat to plants, insects and birds.

Concern that there is a need to remove hedges to improve access. There is a tree with TPO immediately adjacent current access.

Children will need to cross a dangerous road to access the shop and village hall.

Concern over Loss of agricultural land.

There is a need to look clearly at the village.

There will be an impact from streetlighting. Streetlighting would not be required if the site was in the centre of the village.

Respondents raise concern over the increase in traffic including that the roads are dangerously congested, the site would create excessive extra traffic through the main residential area of the village, in particular past the school and village hall, visibility is good although the road is not wide enough for two cars to pass and increases in traffic will impact environmental and social sustainability. Residents would be reliant on the private car as reflected in the Blue Barn Farm appeal. The road is narrow.

There is no footpath outside the site and urbanising would be required to provide a footpath.

The sewage system is inadequate. The proposed 37 houses on the Hubbards site will add to this.

Internet speeds in the village are low.

The site has been selected because the land has been offered for development.

There is a need for houses of various sizes, affordable housing for the young and housing for the elderly. Building small affordable homes for first time buyers and those wishing to downsize would create a real community.

It is commented that utilities companies have indicated that the quantum of development considered is acceptable in this location.

It is commented that the draft SHELAA identifies overhead cables as telephone cables, however they are low voltage aerial bunched cables belonging to UK Power Networks.

It is commented that there is risk of flooding in the north and south corners of the site. Any application would have to demonstrate that Sustainable Drainage Systems and flood risk had been considered carefully.

Observation:

No objection to site SCLP12.54, SCLP12.55 or to the Soames site being put forward by the Parish Council. However, consider 55 additional houses, plus the permission for 35 on the Hubbards site, is too high for Otley. This will have a detrimental effect on the character of the village and strain infrastructure. There are issues with water pressure in the Helmingham Road area. Traffic would increase substantially. An extra 20 or 30 houses should be the maximum.

**How these comments have been taken into account in the Final Draft Local Plan:**

The site allocation is removed from the Final Draft Local Plan in response to consultation feedback whereby it was suggested that a more centrally located site would be preferable. The Final Draft Local Plan identifies an alternative site adjacent Swiss Farm Cottage which is more centrally located in the village (policy SCLP12.59), for a similar level of growth for the large village of Otley to evolve over the plan period up to 2036.

Infrastructure requirements are incorporated alongside the policy, based upon the Council's evidence base and engagement with infrastructure providers.

## Policy SCLP12.56 Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)

Total comments	Support	Object	Observation
17	1	8	8

### Statutory Consultees

Suffolk County Council state that the following text should be added: 'This large site lies to the south of prehistoric and Roman sites excavated prior to development of land south of Featherbroom Gardens. It has not been subject to systematic archaeological investigation. Suffolk County Council have highlighted that archaeological assessment should be required to inform any planning application to ensure that proposals are sensitive to assets of archaeological interest.' The following should be added to the policy: 'Proportionate archaeological assessment will be required.'

In relation to minerals, Suffolk County Council comment - Lowestoft formation, abuts residential area reducing extractable area. Quite close to A12, though consideration would need to be given to lorry routing. Assessment of material, to decide if prior extraction/use on site is desirable.

Suffolk County Council comment that there should be an extension of the footway on B1438 High Street to site access and pedestrian crossing facility required to create connection to continuous footway. The existing 30mph speed limit terminal will need to be relocated in a southerly direction to accommodate frequently used residential access road. There are significant cost and time implications for the completion of this process.

Suffolk County Council comment that Wickham Market Primary School is currently forecast to have sufficient capacity to accept the additional demand emanating from this development.

In relation to secondary education, Thomas Mills High School is forecast to exceed capacity and this development will further exacerbate a shortfall in places. The school has limited ability to expand on its current site, but the school is not landlocked. The County Council will consider whether expansion is likely to be required during the plan period, and advise the District Council in respect of any additional land requirements.

### Parish and Town Councils

Ufford Parish Council comment that development of this scale will have a significant impact on Ufford residents living along the High Street. Southbound traffic from Wickham Market must go along Ufford High Street. There have been accidents. Could the developers place another slip road onto the A12?

Wickham Market Parish Council appreciate that many in Wickham Market feel that if development has to take place adjacent to the Wickham Market Settlement Boundary then this might be the best location. However as it isn't in Wickham Market parish it cannot be considered in the Neighbourhood Plan. The residents would use services in Wickham Market but the Parish wouldn't

receive CIL which is unjust as the Council's definition of CIL is 'This is a standard fee that is applied to new development to pay for infrastructure that supports new development in the District.' With the figure of 100 dwellings for Wickham Market Neighbourhood Plan this is a total of 220. The Aecom Housing Needs Survey for Wickham Market states that the maximum should be 110. The Neighbourhood Plan is looking to allocate sites 499 and 1114, however the services of Wickham Market cannot cope with SCLP12.56 and these sites.

Wickham Market Parish Council state that it is concerning that no Settlement Sensitivity Analysis has been conducted for Wickham Market to inform the policy. They state that there should be stronger policy relating to inclusion of custom build. There should be stronger policy regarding provision of open space to not only act as a focal point but to provide a visual buffer to Wickham Place and provision of suitable green infrastructure / planting / open space on all site boundaries. They state that there should be stronger policy on footway connections to Chapel Lane and the B1438 and that there should be a carefully designed highway access which is sensitive to the retention of the well-established roadside avenue trees.

Marlesford Parish Council comment that there should be new slip roads from the B1438 to and from the A12 (S bound) carriageway provided. This would reduce traffic through Wickham Market, Melton and Ufford.

Pettistree Parish Council object. There have been no discussions with the Parish Council. The Parish Council only learned of the proposal when viewing Hopkins Homes display boards. It has disregard for Parish boundaries. It would result in the loss of physical separation between Wickham Market and Pettistree. The classification of Pettistree as 'small village' will result in additional development between Pettistree and Wickham Market. The amenities of Pettistree could not cope with the increase in residents. Endorse the comments of Mrs Caudwell. County Councillor Nicoll supports this letter. The Parish Council unanimously object to the proposal. Query the legality of the change of the Settlement Boundary. Small developments have previously been refused in Pettistree due to it being an Area to be Protected from Development. The footpaths are used by many tourists. The narrow roads through Pettistree are used as a short cut.

### **Other organisations**

None received

### **Developers/Landowners**

Hopkins Homes support the proposed allocation. The plan will be Examined under the new NPPF. There are no designations or policy constraints on the land. Development would be largely concealed from views by trees / landscaping. A landscape assessment concludes it is not a 'valued' landscape in the context of the NPPF and can be integrated without significant harm.

Access can be achieved through a T junction.

It is well located in relation to existing services and facilities. There is a bus stop adjacent to the site with an hourly service.

There will be a limited impact from traffic on Wickham Market as most traffic will go south.

The site is in single ownership and Hopkins intend to bring it forward within five years.

Based upon Hopkins Homes assessed need for the District, Wickham Market should provide for 297 dwellings. The policy should therefore read 'at least' 120 dwellings.

The provision of at least 15 self-build units conflicts with policy SCLP5.9. It is unlikely those wishing to build self build dwellings will wish to do on a new development. The requirement is not justified. Self build should be encouraged, not required.

Criteria (c) and (f) on open space are duplicates.

Carter, Edward objects and states that a new access and footways would be required. Limited screening exists. It is in a sensitive river valley landscape. There are biodiversity constraints due to hedgerows and mature trees. Protected and priority species have been recorded close to the site. There are 5 amber conclusions in the Strategic Housing and Employment Land Availability Assessment.

### **Members of the Public**

#### Object:

It represents an inappropriate approach.

The high concentration of new buildings in one area risks adverse pressure on local infrastructure, increased congestion, pollution and road safety issues.

The development of generic, bolt on housing would adversely impact on the character and topography of the village and countryside.

The development is contrary to SCLP5.1 Housing in Large Villages as it fails to maintain a sense of place or support local identity. There is a need for landscape appraisal and landscape visual impact assessment.

It is not clear whether Wickham Market would be eligible for CIL from the development which would be essential to mitigate the adverse impact.

The number of proposed dwellings exceeds the number of dwellings needed within the village over the next 18 years. Wickham Market has had a lot of development over recent years. Pettistree has not seen any development in recent years and therefore 120 should not be developed. Recent growth should be allowed to settle down.

Future housing development for the village would be best achieved through a number of smaller projects, including use of infill sites to integrate development in a sensitive and sustainable way and avoid the loss of landscape.

More emphasis should be placed on preserving the long term character.

Transport is an issue.

Focusing on the A12 is not appropriate as it is single carriageway. Although the site is next to the A12, transport links are not good. There will be a significant knock on effect on Ufford from traffic.

The speed limit should be lowered.

There will be a detrimental impact on the character of the settlement.

There is an issue of coalescence with Pettistree.

The proposals don't take into account the site being proposed by Hopkins Homes to the south of the village hall.

Respondents raise concerns about infrastructure. Local amenities such as the co-op are at capacity. Respondents comment that health services are at capacity including that the medical centre cannot expand. Support for elderly accommodation will exacerbate this.

It is unlikely that new residents would support local businesses on the centre of Wickham Market due to transport issues.

The Wickham Place development did not result in expansion to the school.

The site is agricultural land, it is important to protect agricultural land considering Brexit.

There will be a need to improve sewerage treatment capacity, this is reflected in policy for the employment area at Border Cot Lane.

The development at Wickham Place has a number of second homes. There is a high proportion of social rented homes in Wickham Market. There is need for affordable homes for people to buy.

Habitats will be lost. The hedgerows protect the wildlife from the weather.

Concerned about noise, pollution and crime during construction.

There will be a loss of house value.

There should be compensation for loss of quality of life.

Consider creating new villages instead.

There has been no consultation with those living nearby other than via a poster.

Concern that Hopkins Homes had prior knowledge of the proposed allocation prior to Pettistree Parish Council.

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text and policy have been amended to address archaeology, minerals, footway connections to chapel lane, the extent of the area for housing development, open space, landscape and the separation of the distinct settlements of Wickham Market and Pettistree.

Requirements in relation to access and transport reflect engagement with Suffolk County Council.

Extension of the built up area of Wickham Market into Pettistree parish does not change the Parish boundary.

The supporting text recognises Wickham Market's good range of services for a village in the settlement hierarchy.

Infrastructure requirements have been incorporated alongside the policy, based upon the Council's evidence base, and engagement with infrastructure providers.

Impacts on agricultural land have been considered through the Sustainability Appraisal, however there are limited opportunities for appropriate development of brownfield sites within the District.

Whilst there are likely to be infill opportunities in Wickham Market, it is considered that these would come forward in addition to allocations to meet the housing requirement over the plan period.

The housing identified seeks to meet the District wide need for housing, and is not focussed solely on meeting needs arising from within Wickham Market or Pettistree.

Biodiversity considerations would also be considered under the policies contained in Chapter 10 Natural Environment.

## SCLP12.57 and SCLP12.58 Land west of Garden Square Rendlesham and Land east of Redwald Road, Rendlesham

Total comments	Support	Object	Observation
26	2	10	14

### Statutory Consultees

#### SCLP12.57:

Suffolk County Council comment that site SCLP 57 in Rendlesham site abuts the waste water treatment plant at Rendlesham. Policy WDM1 of the Waste Core Strategy states that the County Council “will object to development proposals that would prevent or prejudice the use of such [waste] sites for those purposes unless suitable alternative provision is made.”

Suffolk County Council refer to Highway Authority response to DC/18/2374/FUL for 75 dwellings. Issues relating to impact upon the highway network including Melton crossroads were raised and subsequently satisfactorily addressed by the developer (as the impact of this development in isolation cannot be deemed ‘severe’). The proposal includes access from Tidy Road and Garden Square.

Suffolk County Council comment that this scale of development takes Rendlesham Primary School slightly over its absolute capacity (by c.3 pupils). Applications are promoting a larger scale of growth. As part of responding to this Local Plan, the County Council has reconsidered the potential for Rendlesham Primary School to expand from 315 places to 420. Suffolk County Council now has concerns that this scale of enlargement may not now be possible. The implication of this is children from Rendlesham having to be transported. Eyke Primary is just over two miles from these sites, and is an unsafe walking route. The District Council should consider identifying land and funding for a new (second) primary school in Rendlesham. Alternatively, the scale of growth in Rendlesham should be reduced in order that it can be accommodated at Rendlesham Primary.

In relation to secondary school provision, Suffolk County Council comment that additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

#### SCLP12.58:

Suffolk County Council AONB Team support the policy and state that the site is located within the setting of the AONB. This supporting text to policy SCLP 12.58 should reference this point for consistency with other policies. The policy should identify a need for a landscape appraisal. The woodland belts to the north, west and east of the site should be retained and planting reinforced along the B1069.

Suffolk County Council comment that the Highway Authority has been consulted on a much larger proposal at this site (ref. DC/17/5380/OUT) for up to 290 dwellings to be accessed via the B1069.

The highway requirements are likely to be very similar unless the main site access is via Redwald Road (which it could not be in the case of DC/17/5380/OUT). Regardless of the above, the site would require pedestrian connectivity to the amenities in Rendlesham village.

Suffolk County Council comment that this scale of development takes Rendlesham Primary School slightly over its absolute capacity (by c.3 pupils). Applications are promoting a larger scale of growth. As part of responding to this Local Plan, the County Council has reconsidered the potential for Rendlesham Primary School to expand from 315 places to 420. Suffolk County Council now has concerns that this scale of enlargement may not now be possible. The implication of this is children from Rendlesham having to be transported. Eyke Primary is just over two miles from these sites, and is an unsafe walking route. The District Council should consider identifying land and funding for a new (second) primary school in Rendlesham. Alternatively, the scale of growth in Rendlesham should be reduced in order that it can be accommodated at Rendlesham Primary.

In relation to secondary school provision, Suffolk County Council comment that additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### **Parish and Town Councils**

#### **SCLP12.57**

Ufford Parish Council comment that development at Rendlesham continues to add to traffic issues at Melton crossroads. Many vehicles use lanes through Ufford as a short cut which has a very negative impact on Ufford residents.

Tunstall Parish Council comment that development at Rendlesham continues to add to traffic issues at Melton crossroads. Many vehicles use Ivy Lodge Road and Ashe Road, and further development will make this worse.

Rendlesham Parish Council comment that reference to SCLP12.57 in paragraph 12.430 should be SCLP12.58.

Rendlesham Parish Council comment that the importance of policy RNPP1 in the Rendlesham Neighbourhood Plan is not recognised and should be expanded. Reference to the former air base should be removed.

Rendlesham Parish Council state that the policy needs to address flooding and to remove the proposed access from Tidy Road / Mayhew Road and Sycamore Drive as it is narrow.

Campsea Ashe Parish Council comment that the development is likely to lead to increased traffic in Campsea Ashe, and resultant air quality issues.

#### **SCLP12.58**

Ufford Parish Council comment that development at Rendlesham continues to add to traffic issues at Melton crossroads. Many vehicles use lanes through Ufford as a short cut which has a very negative impact on Ufford residents.

Tunstall Parish Council comment that development at Rendlesham continues to add to traffic issues at Melton crossroads. Many vehicles use Ivy Lodge Road and Ashe Road, and further development will make this worse.

Rendlesham Parish Council comment that there is no reference to the lack of vehicular access into the village onto Redwald Road. Support the inclusion of appropriate wording, and also on page 359.

Rendlesham Parish Council comment that the reference to 'good pedestrian access' via Spencer Road should be removed. In reality, this is not good pedestrian access due to the length of the route.

Rendlesham Parish Council comment that the importance for Rendlesham of RNPP1 in the Rendlesham Neighbourhood Plan is not recognized and request that this be expanded.

Campsea Ashe Parish Council comment that the development is likely to lead to increased traffic in Campsea Ashe, and resultant air quality issues.

### **Other organisations**

Suffolk Wildlife Trust comment that SCLP12.57 is within relatively close proximity to the Sandlings Special Protection Area (SPA), and must therefore be assessed as part of the Local Plan's Habitats Regulations Assessment (HRA). Should the site be allocated, any development proposal should be accompanied by a project level HRA.

Suffolk Wildlife Trust comment that SCLP12.58 is within relatively close proximity to the Sandlings Special Protection Area (SPA), and must therefore be assessed as part of the Local Plan's Habitats Regulations Assessment (HRA). Should the site be allocated, any development proposal should be accompanied by a project level HRA.

### **Developers/Landowners**

Christchurch Estates support the policy SCLP12.58, however consider that the addition of the remainder of the site is suitable, sustainable and necessary (site 451). There are five allocations / proposed allocation in the AONB. Every effort should be made to meet housing needs without encroaching on the AONB.

Christchurch Estates comment that 105 units could be supported on the area allocated under SCLP12.58. This is considered to be an appropriate amount of dwellings under the NPPF policy of making efficient use of land.

The Trustees of Bunbury 1997 Settlement object to the proposed allocation SCLP12.57 and propose site 506 for allocation for 100 dwellings. The site was proposed in the preferred options of the Site Allocations plan but removed due to access issues which it is considered can be addressed. The Local Plan should seek to plan for higher levels of growth. *(See representation under Appendix I)*

The Trustees of Bunbury 1997 Settlement object to the proposed allocation SCLP12.58 and propose site 506 for allocation for 100 dwellings. The site was proposed in the preferred options of the Site Allocations plan but removed due to access issues which it is considered can be addressed. The Local Plan should seek to plan for higher levels of growth. *(See representation under Appendix I)*

Capital Community Developments object to policy SCLP12.57 and state that the allocation should be for 75 dwellings. The site was previously allocated for 75 homes. If the issues of transport and the cordon sanitaire can be resolved it should be allocated for 75 dwellings. Rendlesham is a sustainable location due to its range of facilities and proximity to employment opportunities on the former airbase. Rendlesham is outside of the AONB. The recent refusal of DC/18/2374/FUL was due to the 75 units being above the local plan allocation, rather than because of highways or the water recycling centre. The development of 75 dwellings would help to meet local needs. The 2018 NPPF sets out policy in relation making efficient use of land. There would still be a considerable area for open space, wildlife corridors and walking routes. There are no design or landscape reasons why it cannot be allocated for 75 dwellings. It would boost the supply of housing. Comments on the planning application from consultees show that any issues can be resolved.

### **Members of the Public**

#### SCLP12.57:

#### Object:

Proposals put forward have shown it is difficult to develop this site due to the geological nature of the land. Vehicle access, existing water sewerage pipes and flooding issues will affect surrounding properties.

Vehicle access will disturb surrounding properties.

There is existing flooding on the site and it should therefore be excluded (x2). The need for a flood risk assessment must be carried forward from existing policy. The risk of flooding to neighbouring properties should be considered.

The sewerage and drainage systems restrict the potential for new development.

The site is a greenfield site and is in agricultural use.

Respondents comment that the site is a habitat for deer, buzzards, kestrels and owls plus migratory and other birds. This is a particular loss for the AONB.

It is agricultural land.

There is already an adequate supply of houses in existing and draft plans.

Query whether the allocation needs to be automatically carried over.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Reference has been included to the capacity issues surrounding the primary school, and text has been included to state that a focus on smaller or elderly accommodation may assist in addressing this. It has been clarified in the text that education capacity places a limit on further growth.

The transport modelling has included additional consideration of Melton crossroads to consider that

there is a mitigation solution.

It is considered that reference to the former airbase is factual.

Policy RNPP1 of the Rendlesham Neighbourhood Plan relates to the District Centre and it is therefore not appropriate to include reference alongside the two site allocations, both of which are outside of the District Centre.

The sites have been assessed through the Habitats Regulations Assessment and it is concluded that contributions via the Recreation Avoidance and Mitigation Strategy would be appropriate.

#### SCLP12.57

A flood risk assessment is required under the policy.

Sewerage capacity has been considered through the Water Cycle Study and the text recognises that there is likely to be a need for improvements to sewerage capacity.

There are limited opportunities to allocate brownfield sites in the District.

Policy SCLP10.1 will consider any potential mitigation or enhancements in relation to biodiversity.

#### SCLP12.58

Reference to the AONB has been included in the supporting text to SCLP12.63.

Policy SCLP12.63 contains reference to footways and a pedestrian crossing point.

The Policy does not specify that access would be from Tidy Road / Mayhew Road and Sycamore Drive.

Reference to 'good' pedestrian access has been removed from paragraph 12.672.

It is not appropriate to allocate the larger site area, or other sites within Rendlesham, due to infrastructure constraints, particularly around school provision and the transport network. For the same reason, it is not considered appropriate to increase the number of dwellings on the allocated land.

## Policy SCLP12.59 Land opposite the Sorrel Horse, The Street, Shottisham

Total comments	Support	Object	Observation
74	10	55	9

### Statutory Consultees

Suffolk County Council comment that Likely access point to site is within a very narrow section of road and there is a tree-lined embankment. Therefore, it is likely that the embankment will require removal and trees/hedges removed or relocated to create a suitable access to the site with regard to visibility splays and road width. This requirement may not be feasible given the AONB and Conservation Area status of the area.

Suffolk County Council comment that the catchment school – Hollesley Primary – does not have sufficient capacity to accept the pupils emanating from these sites. The school has sufficient land to enable expansion, if needed. As such a contribution may be sought.

Furthermore, these sites are each more than two miles from the catchment school. As such, the County Council would appreciate the opportunity to discuss this site before allocation. In relation to Farlingaye High School additional demand arising from these sites will be met at Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Shottisham Parish Council have received a petition from 63 residents calling for the allocation to be removed.

### Other organisations

Suffolk Wildlife Trust comment that the site is close to the Sandlings Special Protection Area and the Deben Estuary SPA and Ramsar site, it must therefore be assessed as part of the Local Plan's Habitats Regulations Assessment. Any development proposal should be accompanied by a project level HRA, as well as an ecological survey (as detailed in the draft policy).

### Developers/Landowners

The Sorrell Horse Shottisham Ltd support the allocation.

The Bawdsey Estate comment that they have no objections to allocation of this site but consider that other sites in Shottisham should also be allocated. These would be in close proximity to facilities and help to meet housing need. *(See also Appendix I comments)*

### Members of the Public

#### Support:

*(no further comments)*

Object:Character / visual impact

A number of respondents have commented that development would harm the character of the village.

Development would ruin the historic and picturesque heart of Shottisham including knoll, church and pub. Development will radically alter the nature of the historic location. Prominent site (x3)

It would create an eyesore from across the hill where the church is and ruin the appearance on the approach from Woodbridge. It doesn't meet the target of aiming to 'maintain and enhance sense of place'. There would be a negative impact on approaches into the village.

Shottisham does not need urbanising.

It will ruin the pretty village. It will ruin the idyllic setting. It is one of Suffolk's most beautiful settlements. It will destroy the charm of the village. It will disturb the local ambience.

The site contributes to the character and setting of the village.

The site is countryside.

It is out of scale with the surroundings.

The density is higher than the rest of the village. It will be over bearing and out of scale.

It is out of keeping with the village.

A number of respondents express concern in relation to impact on the AONB. There will be a negative impact on the landscape. There is no reason to build in the AONB as there are plenty of houses being built in Woodbridge.

Concern is raised that highways works would alter the character and the access would involve the removal of the ancient hedgerow. The sunken road lined with hedgerows is part of the character of the village.

Access and transport

A number of respondents have raised concerns in relation to access. The site is inaccessible. Access via Villa Hill would be disruptive, access from Hollesley Road would require destruction of an historic holloway. Object to access to parking via Villa Hill – access should be via Heath Drive. There should be no restriction on parking in the village or double yellow lines. Concern over increase in traffic onto Villa Hill which is an unmade track and used by livestock. Due to the narrowness of The Street and danger to pedestrians, an access on to The Street had been turned down by Highways. Access area is a bottle neck and would be a constant hazard. Access from Villa Hill would not be viable due to the height difference. Access should not be from Heath Drive, a new access should be constructed.

Villa Hill is unsuitable for a pedestrian access as it is an unmade track and is access for properties on the hill. Provision for pedestrians should be provided on the site itself and could be promoted as a safe walking route. Site could be used as pedestrian link between Heath Drive and centre of village. Crossing The Street is a concern.

A number of respondents have raised concerns in relation to increased traffic / CO<sub>2</sub> emissions, including comments that there is no public transport, residents will need cars, it will not help to meet the aim of reducing the need to travel, the road infrastructure is poor, there is congestion, there would be congestion at the crossroad, the roads cannot cope and road safety is an issue. There shouldn't be any more traffic on Villa Hill. The T junction over the bridge often backs up.

A number of respondents comment that the road is narrow and single track with no footpath and that access and visibility are issues.

Concern is raised that there would an impact from noise from traffic. Already many farm vehicles use the roads.

Hollesley Road is hazardous – the addition of pedestrian crossing to the pub would exacerbate this.

#### Services and facilities

A number of respondents have commented on a lack of services in the village. The village has no school, shop, employment opportunities or public transport. The village has no employment other than the pub. Shottisham is a long way from colleges, universities and regular employment. There are no transport links to main railway lines. Ipswich is difficult to get to. It is unlikely that younger people would wish to stay in the village. Development would be contrary to the Council's policy on sustainability.

Due to the price of fuel more people are opting to live where there is public transport.

Due to a lack of services it is unlikely to be suitable for affordable housing.

It doesn't meet the policy in the Local Development Framework of locating housing close to services and public transport.

The lack of services risks the development being attractive to second home owners.

The development should be accompanied by a shop, public transport and medical facilities. The nearest supermarket is 8 miles away.

There is no transport to employment.

Respondents comment that Shottisham is classed as countryside.

#### Housing need / mix

A third of houses in Shottisham are holiday homes. The ratio of second home owners is not sustainable. The development will not help meet local needs. Affordable should mean that those working in the pub could afford to buy houses. Can't see how it will be affordable. Any market homes will not be affordable to those on low incomes.

There is no need for affordable housing / new housing.

Question that priority will be given to social housing. It is unlikely that affordable housing could be achieved as the village has no school, shops or public transport and given the costs of development.

Respondents comment that the 2015 Parish Council survey identified that 23 respondents did not wish to see any new housing in the village.

Delivery of affordable housing would not be possible without the land being given for free. Concern that affordable housing would not benefit residents of Shottisham as a payment is required. There is no demand for market housing.

A number of respondents comment that houses for sale in the village haven't sold . These have been of varying sizes.

The Parish Council have identified a need for 6 dwellings, not 10. Development would be contrary to SCLP5.4 which specifies up to 3 or 5 dwellings.

The Parish Council Housing Survey Analysis 2015 shows a need for affordable and smaller housing for downsizing, however it is understood elderly people in the village do not wish to downsize. There is no need for executive housing. Would support the Peninsula Villages Community Land Trust to develop the site. Concern that housing could be used as weekend or holiday homes.

The village plan does not reflect objections to new housing.

The land could be better used for the community rather than housing.

Most who complete secondary education move away from the village. Young people would not want to live in the countryside. Shottisham is not a good location for young families due to the need to travel for schools and work. The lack of services undermines the needs for affordable housing. Affordable housing should be near to places of employment. Retirees need amenities. Housing Association units will become available.

It is unlikely that the development will meet local affordable needs.

### Historic Environment

New development would impact on the historic buildings adjacent to the site and the character of the village. Development should be screened to ensure it does not impact the Conservation Area and village setting.

A number of respondents comment that it is in / will impact on the Conservation Area. It will impact along with other recent developments. There will be an impact on the setting of properties in the Conservation Area. The site is in the historic centre and would completely change the village. It will ruin the heritage. The site should be in the Conservation Area boundary.

Respondents comment that there will be an impact on Listed Buildings. Respondents comment that the site provides the setting to the Listed Sorrell Horse pub, historic cottages and village square. It will impact on the setting of the church. It will spoil views from the pub.

The area is of archaeological interest. An archaeological assessment is needed.

### Biodiversity

Wildlife in gardens to the west of Villa Hill should not be disrupted. There are deer, rabbits and many birds on the site.

Respondents comment that there is wildlife / protected species on the site and it is part of a habitat network. There are bats, hedgehogs, swifts, swallows, deer, insects, rabbits, badgers on the site. A biodiversity study is needed. Wildlife could be enhanced, possibly with assistance from the Suffolk Wildlife Trust.

It should be preserved for wildlife and wild flowers.

The owners of the site could provide enhancements for wildlife instead. It could be used for positive projects for the community. It should be used for community use.

### Availability / deliverability

A number of respondents comment that there is no agreement with the owners of the land who are the 222 shareholders of the Sorrell Horse pub. A number of respondents comment that the community bought the pub to stop development happening. There needs to be shareholder approval. The resolution was that this land would not be built on. There has been no opportunity for scrutiny from shareholders and no consultation with shareholders.

Concern over the deliverability and environmental impact when considering the numerous obstacles in the policy.

Query whether it is feasible to develop 10 houses on the site in terms of density. There is insufficient space to accommodate 30 parking spaces and 10 dwellings.

May not be viable due to earthworks required.

The Board's decision to support is not unanimous.

### Alternatives

Would prefer development to be carried out away from the road to maintain the bank and hedge on Hollesley Road – further land is owned by the same owner on land to the south of the site. The site would need to be excavated or would be too prominent in the landscape.

Respondents comment that there are more appropriate locations for affordable housing. There is general support for affordable housing but not on this site. Other sites should be considered. Development should take place in Martlesham or Melton instead where there is easy access to the A12 and A14. Sites where there are services and facilities should be considered.

Respondents comment that they would prefer use of the Council owner larger plot of land in the Heath Drive area, which does not have dangerous access although would not benefit the pub or provide a car park.

Respondents comment that a site could be found in places on the peninsula that have services.

Development would be contrary to the SCDC Local Development Framework policy of using brownfield sites first.

There are better locations for off street parking.

There are better sites elsewhere in the village.

#### Car park

Car parking is needed for the pub. The policy does not specify how many spaces in the car park will be for residents / visitors of the site and how many for the pub. Requires proper allocation as existing residents may use it rather than parking on street. The carpark will have management and operations issues, could be used for storing boats and caravans. On street parking helps to reduce speeds. It is unlikely that residents would use the car park.

Concerns over noise pollution from a pub car park. Landscaping may help with this.

Object to the car park due to need, safety and loss of habitat. On street parking is due to a lack of parking close to homes. Those who live in old properties expect limited parking. The pub already has a car park.

#### Utilities and Drainage

Respondents comment that utilities cannot cope. There is no mains sewerage or gas.

Respondents comment that there are issues of run off on Villa Hill. Disposal of sewage and run off from the site would be problematic. The topography is unsuitable and would cause issues for drainage. Run off would become worse with an increase in impermeable surfaces. Concerns over drainage. The development would need more than 0.42ha to accommodate the drainage and parking. There is no mains drainage.

#### Other comments

Petition signed by 89 residents - Policy SCLP 12.59 Land opposite Sorrel Horse, Shottisham, Suffolk proposed allocation for approximately 10 houses and 30 car park spaces. We the undersigned are concerned village residents who call for this allocation for housing development to be removed.

Respondents comment that the site boundary is inaccurate. The eastern boundary looks to be further from Houston House than the reality of the boundary. Query whether development would only extend as far south as Driftway.

There has been no consideration of options.

There has been no consultation.

There should be a minimum 6 metre buffer between the boundaries of adjacent land with a fence.

Young people are unlikely to use the pub. New houses are not needed opposite the pub.

It is a greenfield site.

Concern about impact during construction from machinery and parking, and vehicles on the roads.

Construction, and noise and air pollution, would be detrimental to the village. There will be impact from large vehicles during construction.

New homes in this location will increase carbon emissions.

It will make the village busier.

Respondents have raised concern over impact of light pollution.

Respondents comment that there will be an impact on the amenity of neighbours, overlooking and loss of privacy.

There would be an impact on tourism.

The attraction of Shottisham, is the peace and character and its Pub, Church and Campsite.

Summary of points in favour and against submitted along with objection which can be summarised as, it being important for the pub to be preserved, there is a need to bring younger people into the village, the houses would be small family houses with designs that fit in with the village setting. The arguments against were summarised as the need for housing, the impact on the character of the village, impact on road network, impacts on drainage, impact on the AONB, are the funds necessary, there are other options to support the viability of the pub.

Allocation should be removed.

Do not understand why the allocation is being carried forward now that Shottisham is classed as countryside.

There has been no clear process to result in this options being selected.

Account should be taken of the petition.

There is a division between those for and against.

The site notice was hidden in the hedge. There should have been a letter sent to neighbouring properties.

There should have been a letter to neighbours. The community should have a chance to comment.

It has been put to the community in haste.

Development does not relate to 3.17 Strategic Policy SP para 2,3,5 and 7.

Support:

Support on the basis the land is used to provide affordable homes. This could be provided through co-operation between the community-owned pub and the local Community Land Trust.

There is a need for housing for people to downsize / young people to stay in the village (x2).

The village plan identified a need for new housing. The village could do with more affordable housing.

It could be used for a mix of affordable and other dwellings.

There is a need for affordable housing for rent.

The housing must be for local people.

Respondents comment that it is ideal for smaller houses.

Respondents comment that the site suited for a small development.

It is centrally located.

It will help to support the pub.

Respondents comment that it is currently just wasteland.

The whole site should be developed.

There will be minimal visual impact if the hedge along Hollesley Road is protected.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The site was allocated through the Site Allocations and Area Specific Policies DPD (2017). It is acknowledged that Shottisham is classed as countryside in the review of the Settlement Hierarchy, however as an existing allocation the principle of development is accepted.

Criterion (d) of the policy requires appropriate access arrangements and sight lines to be provided.

Requirements for school and health provision are referred to, with details included in the Infrastructure Delivery Framework.

The allocation has been assessed through the Habitats Regulations Assessment which has identified that contributions through the Recreation Avoidance and Mitigation Strategy will be appropriate.

The policy requires the development of the site to be of a high quality to respond to the site's location in the AONB, and to preserve and enhance the character and setting of the Conservation Area and Listed Buildings. Criterion (d) has been amended to refer to retention of the hedgerow where possible. Reference to the need to consider appropriate lighting has been added to criterion (c).

The development of the site would assist in meeting District-wide housing needs, however the policy requires smaller housing which may assist in provision of housing which is more affordable and in increasing the mix of housing.

There are limited brownfield sites in the District to meet the District's housing need.

Comments relating to the availability of the site in light of views of shareholders are noted, however the site is already allocated and it is not considered that these comments present any certainty that the site will not be delivered over the plan period.

Any potential impacts on amenity would be considered under Policy SCLP11.2.

## Policy SCLP12.60 Land south of Sutton Walks, Sutton

Total comments	Support	Object	Observation
24	1	18	5

### Statutory Consultees

Suffolk County Council comment that connection and crossing point to existing footways required. Access point is over a large ditch so a culvert may require approval of the local flood authority.

Suffolk County Council comment that the catchment school – Hollesley Primary – does not have sufficient capacity to accept the pupils emanating from these sites. The school has sufficient land to enable expansion, if needed. As such a contribution may be sought. Furthermore, these sites are each more than two miles from the catchment school. As such, the County Council would appreciate the opportunity to discuss this site before allocation. In relation to secondary schools, additional demand arising from these sites will be met at the new Brightwell Lakes secondary school. It is envisaged that CIL contributions would be required.

### Parish and Town Councils

Sutton Parish Council object to paragraphs 12.447 – 12.451. The population is not 1,804, but is approximately 280. This has provided a false indication of the scale of the settlement. There are 81 houses already in Sutton. 17 extra houses would be a 21% increase. Query the phrase ‘Around 12 dwellings’ - how many are actually being suggested? There is a lack of detail around how the pedestrian connection would be achieved. The footpath is on the opposite side of the road. Query where and how many affordable houses would be provided. Presumably there is a lack of demand as Flagship Housing have a site vacant for 4 years in Sutton. There is lack of space at Hollesley and Farlingaye. Some pupils go by taxi to Leiston High School. There are traffic issues at Melton cross roads which will be exacerbated. The village has voted by a majority of 90% to object to the proposal. Consider the village should be countryside, not a small village.

### Other organisations

Suffolk County Council AONB Team state that the following should be added:

‘Provision of landscaping, boundary treatments and a lighting strategy which respond to the site’s location in the AONB and;’

### Developers/Landowners

Sutton Hall Estate support the proposed allocation and state that it can be developed in accordance with the policy. The proposed layout would incorporate a mix of house types and retain the liner form. The access can meet Suffolk County Council requirements. The allocation of the larger initial area is encouraged.

### Members of the Public

Object:

A number of respondents state that reference to a population of 1804 residents is incorrect, it presumably includes Sutton Heath as the population is around 280. Proposal should not be considered until information is corrected.

The number of properties is disproportionate to the size of the settlement. Numerous outlying properties exist – the core of the village is along the main through route and Post Office Lane which has a population of around 150. The proposal would increase the village population by 28%.

A large number of respondents comment that Sutton has a lack of services including that it has no shop, no pub (with little prospect of it being restored), no bus service, no mains sewerage system, no mobile phone signal, the post office is provided by a mobile van, the library is a mobile service and no/limited broadband. It is not suitable for further development. Development should take place where there is a regular bus service. The Connecting Communities service is unfeasible for commuting. The lack of bus services would make it less suitable for elderly residents. The village is over 5km from Woodbridge, it is closer to 8 or 9km.

Other comments were made in relation to the quality of services. The pub was not well used previously and may become unsustainable as a business. The mobile library and post office do not call at convenient times. The distance from the proposed site should be used to measure distance to Woodbridge. The village should score 6 points / 7 points in the Settlement Hierarchy. The post office van / library van operate weather permitting. There is no post office. The mobile library only calls for 20 minutes every month. The library service may be withdrawn.

Respondents raise concern that the local schools are full / almost full. There is lack of space at Hollesley and Farlingaye.

Respondents comment that 'Around' 12 houses is too vague.

Respondents comment that the site could not be connected to the existing footpath as it is on the opposite side of the road. A new crossing may have a detrimental visual impact on the AONB. The footpath on the opposite of the road is narrow.

Respondents raise issues related to the roads including that the development will lead to an increase in traffic and congestion, the roads are already severely congested, including at Wilford Hollows and the Melton traffic lights, the road is dangerous and is icy in the winter, and there have been accidents, the site is on a bend and the Council would need to pay for maintaining and modernising the B-road network. There are traffic issues at Melton cross roads which will be exacerbated. Concerns over access on to the fast road. There are constant traffic jams to Melton.

Respondents comment that access is already difficult to some houses because of the bend.

There are many empty houses at Sutton Heath. Sutton Heath would be more suited to an allocation as it has more facilities and the military may leave the site during the plan period. New housing would need to be affordable. It would be difficult to find developers for the affordable housing.

A number of respondents comment that there is land for sale for housing in Old Post Office Lane which has been for sale for many years and not sold – this suggests there is no need for extra

houses. This development would be sufficient for a village the size of Sutton. Rock Barracks could provide a significant area for new housing. The houses should be allocated in Sutton Heath. Brownfield sites e.g. MoD Woodbridge should be considered. These are likely to have a better range of facilities.

The site is a greenfield site.

The land should remain in agricultural use.

Concern that the hedgerow won't be retained.

A number of respondents raise concern over potential impact on the AONB. Removing the hedgerow would have an impact on the AONB. Introduction of street lights may have an impact on the AONB.

Linear development is usually not acceptable.

Concern development would extend further south in the future.

Quality of life would be decreased for existing residents.

There should be an example of what low density means.

Concern that additional development would come forward on further sites e.g. Chequer Field.

Observation:

There is a strip of land on the side of the site which is privately owned.

Councillor Christine Block comments that the text is inaccurate in relation to facilities. The development would distort the natural and distinct settlement boundary and surrounding open countryside. The site at Post Office Lane may be an alternative. Land to the back and side of the pub may also be an alternative – it has been considered for some housing in the past and is in a central location.

**How these comments have been taken into account in the Final Draft Local Plan:**

Sutton is reclassified as countryside in the Settlement hierarchy and therefore the site allocation has not been progressed to the Final Draft Local Plan.

## Policy SCLP12.61 Land off Howlett Way, Trimley St Martin

Total comments	Support	Object	Observation
99	0	91	8

### Statutory Consultees

Suffolk County Council comment that it is envisaged that a new roundabout will provide the main vehicular access on Howlett Way and there will also be improvements to pedestrian crossing facilities on Howlett Way and High Road as well as sustainable links, which are required to make the development acceptable. A development of this scale requires a secondary emergency access and this is likely to be via Church Lane, although would feature removable bollards to prevent non-emergency use. It is worth noting that the applicant is yet to provide evidence that the proposal would not cause a 'severe' impact upon the existing highway network and this may result in a requirement for mitigation remote from the site, most likely on the High Rd/ High St corridor. The cumulative impact of SCLP12.61 and SCLP12.62 on High Road needs to be considered.

Suffolk County Council comment that a significant amount of growth has already been permitted in the Felixstowe/Trimleys area, and the sites listed will add to pressure on local schools. The County Council's preferred option is to establish a new primary school on the North Felixstowe Garden Village site. The requirement is set out in Policy SCLP12.3. Sufficient land should be provided for a school that could eventually be a 630-place school. In addition, the County Council is exploring two options for providing additional capacity in the Trimleys area; either the establishment of a new 210-place school or the relocation of Trimley St Martin Primary to enable its expansion from 210 places to 420. An analysis of travel data indicates a preferred location, and 2.2ha land is accordingly identified to enable this at site 12.62.

Assessment of material, to decide if prior extraction or use on site is desirable.

### Parish and Town Councils

Trimley St Mary Parish Council comment that this area will have a direct impact on Trimley St Mary as it abuts our parish boundary and has direct pedestrian access into the village. It would make sense to provide a pedestrian crossing in this area of the High Rd to allow pedestrians from the development to cross the road safely. We are pleased to note that the only vehicular access is via Howlett Way however, we believe it is likely that residents in this area are likely to drive to the village centre rather than walk. We already note the tendency to drive to the village shop on the High Rd, to drive to the school and to drive to The Sausage Shop rather than walk. Ask that an area of this development, abutting Church Lane, be allocated as a public car park, accessed only from Church Lane, in order to ease congestion.

### Other organisations

Suffolk Wildlife Trust comment that the site is within 2km of the Stour and Orwell Estuaries SPA and Ramsar site, policy SCLP 12.61 and its supporting text makes no reference to assessment of the potential impacts on these sites, or on any ecological receptors which may be present on the

allocation site. The principle of such impacts must be appropriately considered before this site is allocated. If it is determined that the allocation of some development in this location is acceptable then the site allocation policy should secure full assessment of impacts, delivery of mitigation and/or compensation measures and delivery of ecological enhancement measures. In particular any development at this site should deliver significant green infrastructure provision as part of its design.

Additionally, the Wildlife Trust note that a number of large sites are proposed for allocation in the Trimleys and north of Felixstowe. It is essential that the potential cumulative impacts of this level of development are assessed as part of the Local Plan process. In particular such development has the potential to result in significant adverse impacts on sites designated for their nature conservation value.

Suffolk County Council AONB Team comment that existing hedgerows bordering the site will be retained to help maintain the character of the area. This is welcome. The AONB team consider opportunities exist and should be identified to enhance the ecological interest and improve GI linkages across the site as part of the new open space/green infrastructure provision on site.

### **Developers/Landowners**

None identified

### **Members of the Public**

Substantive feedback from the public concerned the following matters:

The most common and main thrust of feedback from the public to this site allocation is the amount of growth imposed on the Trimley villages. Responses against this site allocation take issue with the cumulative development seeing it as overdevelopment imposed on the villages and raising proximity to the AONB.

Cumulative traffic impacts and the accompanying noise, air and light pollution will detrimentally affect the well being of residents plus the visual impact upon existing landscapes. This does not take account of the prospect for huge volumes of lorries appearing in the general area on a day to day basis. High Road is a narrow Roman road that cannot cope with the extra traffic. Frequent diversion of port HGV traffic through the village.

The allocations risk coalescence between Trimley St Mary and Trimley St Martin and loss of distinct village character.

Other public feedback was:

Sewerage disruption on an already stretched system.

The Felixstowe 'garden' development also will address needs of the local area.

Surgeries and schools are full.

Provide a pedestrian crossing in this area of the High Road to allow pedestrians from the development to cross the road safely. Other traffic calming, signalling and A14 access closure ideas were suggested.

Need for stopping off layby / car parking for school drop offs.

Impact on biodiversity.

A supermarket is needed before new homes.

This scale of new housing will exacerbate existing pressures on the Grove Medical Centre in Felixstowe, Ipswich Hospital, elderly care and other local health and social care services constrained by skills and staff limitations to grow their services.

Too close to A14 for young family affordable homes.

Redevelop Poultry Farm instead.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The allocation is an existing allocation in the Felixstowe Peninsula Area Action Plan DPD.

Supported text added to address minerals, archaeology, education and feedback in respect of other County Council infrastructure functions.

The policy wording and supporting text are amended to address impacts on and connectivity with the Area of Outstanding Natural Beauty, landscape and Landscape and Visual Impact Assessment and ecological assessment.

The Final Draft Local Plan strategy and site allocations at the Trimley villages reflect site allocations in the adopted Felixstowe Peninsula AAP, delivery of a new school, the settlement hierarchy, strategy for rural areas / villages, infrastructure delivery and regard to settlement coalescence.

Site allocations and policies in the Final Draft Local Plan have been subject to supporting cumulative highways modelling. The supporting Strategic Housing and Employment Land Availability Assessment has included engagement on highways impacts of potential sites such as recorded safety issues. The Strategic Housing and Employment Land Availability Assessment findings have been used to inform the selection of potential SHELAA sites for allocation for new development.

The policy sets out a criteria that vehicle access is to Howlett Way only.

Analysis of responses to the spatial strategy section addresses feedback in relation to the appropriate scale of housing growth attributed to the Trimley villages.

The strategy for housing growth is consistent with and informed by up to date evidence of District housing requirements.

Infrastructure requirements have been included alongside the Policy, reflecting the Council's evidence.

## Policy SCLP12.62 Land adjacent to Reeve Lodge, High Road, Trimley St Martin

Total comments	Support	Object	Observation
80	1	66	13

### Statutory Consultees

Suffolk County Council comment that minerals assessment of material is needed, to decide if prior extraction/use on site is desirable. It is unclear where this site would access the highway.

Suffolk County Council comment that it is unclear whether a fifth arm could be provided on the roundabout, it appears unlikely due to the proximity to the recent development access on the north western side. Alternatively, a new access would need to be provided directly onto High Road (where widening and a right turn lane are likely to be required). Pedestrian crossing facilities on High Road as well as sustainable links are likely to be required to make the development acceptable.

Suffolk County Council comment that the cumulative impact of SCLP12.61 and SCLP12.62 on High Road needs to be considered. Significant amount of growth has already been permitted in the Felixstowe/Trimleys area, and the sites listed will add to pressure on local schools. The County Council's preferred option is to establish a new primary school on the North Felixstowe Garden Village site. The requirement is set out in Policy SCLP12.3. Sufficient land should be provided for a school that could eventually be a 630-place school. In addition, the County Council is exploring two options for providing additional capacity in the Trimleys area; either the establishment of a new 210-place school or the relocation of Trimley St Martin Primary to enable its expansion from 210 places to 420. An analysis of travel data indicates a preferred location, and 2.2ha land is accordingly identified to enable this at site 12.62.

Suffolk County Council comment that this scale of growth, alongside the dwellings already permitted, cannot be accommodated at Felixstowe Academy. It is envisaged that the school would expand on its current site to meet demand arising from growth. If needed, the new secondary school at Brightwell Lakes could also expand to take some pupils from the Felixstowe/Trimleys area.

### Parish and Town Councils

Trimley St Mary Parish Council - a significant proportion of this land lies within the parish of Trimley St Mary which has no new housing allocation. It is noted that this area is to provide approx. 150 dwellings. The 2011 census states that average occupancy at that time was 2.3 persons per household. Even at average rates this will mean a population increase of 345 people. This will require approx. .83 hectares of recreational open space. This represents approx. 11.7% of the total

parcel of land. We believe that this is in excess of any green space dedicated for sole use by the proposed primary school.

Trimley St Mary Parish Council - under previous plans for the area, it has been held as important that a green area should be maintained between the villages of Trimley St Martin and Trimley St Mary in order that the parishes retain their separate identities. This has meant that contiguous development has been avoided.

Trimley St Mary Parish Council - have already identified a significant deficit in recreational green space. Part of the land within the parish of Trimley St Mary should be designated recreational green space. This is the land south and east of Gun Lane (the parish boundary). If a school was to be located behind Reeve Lodge then the school would also have access to the recreational green space we have proposed – it is suggested that this would be a very sensible example of joined up thinking.

### **Other organisations**

Suffolk County Council AONB Team – Development proposals should identify opportunities to enhance the ecological interest and improve Green Infrastructure linkages across the site as part of the new open space/green infrastructure provision. Acknowledge more clearly in the policy the site's location and setting relative to the AONB on the western edge of Trimley St Martin, the following amendments should be made to the policy: Bullet point (e) should be amend to read 'Provision of appropriate landscaping, boundary treatments and lighting strategies to provide a soft western edge to the development and to minimise impacts on the AONB. Add the following new bullet points: (h) Provision of an LVIA to inform the landscape strategy for the site; (i) improve pedestrian/cycle links from the site into the surrounding countryside and AONB.

### **Developers/Landowners**

Pigeon (2025) - Demonstrate at an early stage that ecological, landscape, utilities, transport and drainage matters can be suitably addressed. Fully concur with this assessment and as set out in the Council's Strategic Housing and Employment Land Availability Assessment. Confirm there are no technical or policy issues to preclude the scheme from coming forward and that ongoing engagement with SCC is positive around the provision and siting of the primary school.

### **Members of the Public**

The proposal represents top down reshaping of the community.

Need and concerns for maintaining a stable community have to be heard and factored in. Cumulative developments in the area are excessive.

The site allocation constitutes 'cramming' when added to further proposed allocations in Trimley St Martin and Trimley St Mary. Risk of over building.

Due to recent housing developments there has already been a considerable increase in traffic along the High Road which cannot cope as it is. Concern is raised over impact on roads and services. Issues of roads safety exist.

Adverse impacts on wildlife and loss of agricultural land.

The need for such provision is questioned.

Cllr Richard Kerry - support the submission on this policy from Trimley St Martin Parish Council and suggest that the village needs a period of constraint in order to assimilate existing housing growth commitments.

Cllr Susan Harvey - In terms of accessibility by walking it must not be overlooked that a lot of the children who attend Trimley St Martin school at present come from Kirton who are faced with a walk to the suggested new school a further ¾ mile away on foot. The children who do walk from Kirton tend to be those who are from poorer backgrounds and do not necessarily have transport. The existing school should remain open.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Amendments to the site allocation policy and supporting text address minerals, archaeology, education and open space / green infrastructure provision.

The policy wording and supporting text are amended to address impacts on and connectivity with the AONB, landscape and LVIA and ecological assessment.

The Final Draft Local Plan has been positively prepared to meet development needs of the area including for housing in line with national policy and protection of the environment including the AONB. Supporting evidence in the Strategic Housing and Employment Land Availability Assessment does not provide sufficient previously developed land to meet the evidenced development needs so greenfield agricultural land sites are identified for new development.

The policy includes a criteria in respect of provision of pedestrian/cycle links from the site, including connectivity into the surrounding countryside and AONB.

The policy requirement for provision of pedestrian/cycle links from the site provides flexibility for the feasibility of new pedestrian crossings of High Road to be given scrutiny.

Site allocations and policies in the Final Draft Local Plan have been subject to supporting cumulative highways modelling. The supporting Strategic Housing and Employment Land Availability Assessment has included engagement on highways impacts of potential sites such as recorded safety issues. The Strategic Housing and Employment Land Availability Assessment findings have been used to inform the selection of potential SHELAA sites for allocation for new development.

The Final Draft Local Plan strategy and site allocations at the Trimley villages reflects site allocations in the adopted Felixstowe Peninsula AAP, delivery of a new school, the settlement hierarchy, strategy for rural areas / villages, infrastructure delivery and regard to settlement coalescence.

Analysis of responses to the spatial strategy section addresses feedback in relation to the appropriate scale of housing growth attributed to the Trimley villages.



## Policy SCLP12.63 Land off Keightley Way, Tuddenham

Total comments	Support	Object	Observation
51	2	46	3

### Statutory Consultees

Suffolk County Council comment that there should be a link into the existing footways on Keightley Way and links should be provided to local amenities where feasible. Cumulative traffic impact of this site and Ipswich Garden Suburb on this area should be considered.

Suffolk County Council comment that Rushmere Hall Primary is currently forecast to exceed capacity, due to pupils arising from the Ipswich Garden Suburb Development. Given that this development will provide its own primary schools, it is envisaged that Rushmere Hall and the new primaries will, between them, have sufficient capacity to accept these additional pupils. This will need to be reviewed as the Plan is developed further, and as Ipswich Garden Suburb comes forward, in order to ensure that places can be provided.

Suffolk County Council comment that Northgate High School is expected to exceed capacity, with new provision due to be made at Ipswich Garden Suburb. Between them, these schools should be able to make provision for these pupils, although it should be expected that a contribution would be required.

### Parish and Town Councils

Tuddenham St Martin Parish Council object on the basis that the proposal will significantly impact the character of the small village. The proposal is out of proportion with the village. It contradicts policy SCLP5.2 which states

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

a) A small group of dwellings of a scale appropriate to the size, location and character of the village;  
or

b) Infill development (in accordance with Policy SCLP5.7).’

The Parish Council comment that it is disappointing that the Council have ignored the views of the residents made through the 2016 village review where residents were generally in favour of modest development in keeping with the size of the village. It is also commented that previous comments from Tuddenham St Martin Parish Council have been ignored, where issues around access and parking were raised.

The Parish Council state that they have held a public information session during the consultation on the First Draft Local Plan where concern was raised over location of the allocated land, the high number of homes allocated (which seemed disproportionate with the number of homes currently in the village) and associated highway impact. Concern was also raised around lack of capacity in

schools. The limited bus service already results in a reliance on car journeys and older villagers being more inclined to move from the village to locations with better local service infrastructure. None of these issues seemed to be addressed in the First Draft Local Plan. Residents also consider the number of dwellings to be excessive. Additional or alternative sites that have access to the main road should be looked on favourably.

Comparison is made with the proposed allocation in Brandeston whereby development is required to be at a low density and to reflect the character of the area, yet no equivalent consideration has been made in relation to Tuddenham. There is no mention that the allocation for Tuddenham St Martin should be appropriate within the context of the Tuddenham Conservation Area or the low number of homes on the adjoining site.

### **Other organisations**

None received

### **Developers/Landowners**

Pipe, Mr and Mrs support the policy however consider that the suggested density of 35 dwellings is too high particularly considering the Parish Council's desire to improve access to the playground. The village wish to see properties for older people, which is less likely to generate traffic movements at peak times. An area to the northern end of the site would not be built on which would provide for new access to the playground. Wish to address concerns around traffic through development of a smaller number of properties.

### **Members of the Public**

#### Object:

#### Scale of development

A large number of respondents consider that 35 dwellings is too many, and that the density and number of houses would impact the character of the village. The upper limit on new homes should be 12-15. Concern is raised that it would set a precedent due to its size.

It is stated that the size of the development is disproportionate. It is stated that SCLP12.63 contradicts Policy SCLP5.2 which states that for smaller villages 'A small group of dwellings of a scale appropriate to the size, location and character of the village'. It is not in accordance with the infill policy SCLP5.7. It will increase the number of residents by 20%.

It is commented that proposals for Tuddenham have gone from one extreme to another.

Concern is raised over impact on the Conservation Area. There is insufficient reference to the Conservation Area.

#### Access and transport

A large number of respondents comment that the road network cannot sustain more traffic. Specific comments include that large vehicles struggle to get through The Street / Main Road, High Street is very narrow, there are many parked cars, both roads leading to the site are single track and traffic

often has to stop / reverse to pass. Comments are made in relation to the number of extra vehicles that would use the road each day (ranging from 53 to 200) plus service vehicles and emergency / farming / service vehicles. It is stated that 72 properties would use Keightley Way. It is stated that 109 properties would access via Westerfield Lane / High Street which is a single track and already well used. Concern is raised over use of Westerfield Lane which is narrow and would create hazards for drivers, pedestrians and those who use the road as part of a walk. There are no parking areas in the High Street which results in on street parking. Visibility is an issue on The Street. Concern is raised over speeding in the village.

A number of comments are made in relation to access being via the horseshoe bend or via Westerfield Lane. Traffic would have to come from Grundisburgh direction or via Westerfield Lane to avoid the horseshoe bend.

A respondent states that would be in favour if the access was not from Keightley Way.

Respondents have raised concern over lack of safe access to the site including concern over width of the existing road for access and that there is no safe access.

Concern is raised over how emergency services would access the site.

It is suggested that access and traffic issues could be ameliorated by restricting parking in High Street and at the junction of Keightley Way and Westerfield Lane – Westerfield Lane could be local access only. It is commented that there is no parking in the village.

Car parking is an issue on Keightley Way. Car parking is a major issue on narrow roads, increasing deliveries are exacerbating the issues.

It is suggested that there should be a minimum of four parking spaces per property.

A large number of respondents raise concern over disruption during construction and access for construction traffic due to width and form of local road network. It is commented that it would be difficult for construction traffic to turn into Westerfield Road from Tuddenham Road in a northbound direction. The existing road network is inadequate for construction traffic.

A number of respondents have commented on road safety issues including that Keightley Way should not be the main entrance to the development, concern over safe access onto the High Street / local junctions / The Street / Main Road, traffic levels would create an unacceptable danger, there are safety issues at junction with Hill Road and Tuddenham Road. Pedestrian access to the village is restricted / there are safety concerns.

Respondents comment that Keightley Way is not gritted in the winter and additional residents will put further pressure on the volunteer gritters.

It is suggested that there should be a 20mph zone in the village.

It is stated that the development would not allow through traffic.

It is stated that there is no reference to how the impact of traffic will be addressed.

A query is raised over how the potential issues on the highways network raised through the transport modelling will be addressed and how junction safety and access will be improved.

It is stated that better access would be from land to the east of Poplar Farm, although this would still cause issues on Westerfield Road. Access could be through the farm up the road which is in the same land ownership.

It is stated that access to the site is via a standard junction onto the High Street with good visibility.

Respondents comment that Tuddenham is used as a route for those travelling to Ipswich from the A12 / Woodbridge and that this is increasing. Development in Saxmundham, Wickham Market and Darsham will add to this. Traffic is increasing due to other developments in the area.

It is stated that traffic surveys should be undertaken in peak periods.

Respondents comment that the bus service is poor. The last bus from Ipswich to Tuddenham is at 3:30pm. There should be improvements to public transport to support the development. The proposal is contrary to the Council's position on the current appeal for 2 dwellings in Fynn Lane Tuddenham St Martin which is judged to be an unsustainable location. Whilst this is based on the current Local Plan, there have been no changes in the village since this was written. The location under SCLP12.63 is less well connected to the bus stop. This is not a sustainable development as residents would be reliant on cars.

Safety concerns are raised regarding changing Keightley Way from a cul-de-sac to a through road.

It is commented that the development would discourage the use of village amenities and public transport.

### Alternatives

Infill could be developed for example between existing houses on Fynn Lane.

Modest development would be acceptable, and should comprise smaller and more affordable homes.

Respondents comment that the 2016 Village Review showed that residents were in favour of modest development but were concerned about parking and highways and wished to preserve the village character. The preference was for small infill sites and a mix of housing types. In 2016 the Council stated that the village would remain as its current boundary and would not become a suburb of Ipswich. It is queried whether the village review has been taken into account. Respondents consider that the previous views of residents have been ignored.

Respondents comment that it would be preferable to develop around 15/16 houses at Keightley Way and around 4 or 5 at Hilltop (*site 216*). Would welcome small developments on various sites, if the target for Tuddenham is 35 houses.

A number of respondents support the alternative being proposed opposite Fynn Valley Farm and Tuddenham House (*site 1154*). The alternative site would have less traffic impact. Site 1154 would be better due to being nominated by the community, it offers scope for traffic calming, it could

provide improved access / parking for the village hall, it could become a focal point for the village, it is bounded by existing dwellings and the highway on 3 and a half sides, it is within the village and will attract housing associations / none profit organisations.

Object to the alternative (*site 1154*) as it is too large, access would be no better, proposing only 12-15 houses would not attract a developer if also to provide facilities / playing field and site is in agricultural use. Concern that the alternative site would lead to more than 35 dwellings.

It is commented that the Council should approach the landowner of the fields at the back of Westerfield Lane, at the back of where the village hall is, as well as the owner of the Christmas tree business who has suggested he could accommodate 6 bungalows on his land.

Support for development of the small piece of land in front of Fynn Valley Farm for 6-8 houses.

The site adjacent to the hill should be considered.

An alternative location along Main Road should be considered.

Support for an alternative site (unspecified).

Understand the owner does not intend to develop 35 houses.

A number of smaller developments would enhance the village.

#### Services/ infrastructure

Respondents comment that there is no capacity in the local primary and secondary schools. Query what considerations are being made in relation to planning and investment in schools. Existing schools cannot be accessed by footpath. Doctors and dentists are over subscribed. Consideration needs to be given to development in surrounding villages who use the same services.

There are no shops in the village, leading to further car use. There is a lack convenience stores in the area – residents have to use facilities in Ipswich or Martlesham which will put a strain on traffic in those areas. The development is not in keeping with a village with few amenities.

New development in the District should be in line with the amenities available.

The narrow roads make it difficult for service vehicles which also affects amenities.

New properties (and existing residents) should have access to adequate broadband.

#### Open space

The development provides an opportunity to improve access to the playground and field. The site could provide road access and parking to the playing field. The site could incorporate a garden and seating area for elderly residents. More should be done to improve access to the play area.

There should be enhancements to green areas.

#### Design

The style and materials for the houses should be in keeping with a rural village. The development of Fuller's Field in Westerfield is a good example due to black cladding.

#### Other issues

Policy SCLP12.63 seems to lack the care of detail given to the housing provision in other village allocations including affordable housing, housing for older people, bungalows, as well as being sympathetic to the setting of a village Conservation Area.

Tuddenham is keen to be engaged in the planning process and support appropriate housing development.

Recent planning applications have been refused.

Concern over loss of value of existing house.

The development of a cluster of 35 dwellings creates animosity.

Bought a property in Tuddenham due to wish to live in small village.

It seems convenient that the village has been reclassified as 'small village'.

Planning applications for smaller developments have been refused.

In favour of semi detached and smaller properties.

All information on the plans would be appreciated.

Concern that comments are overlooked or ignored. Concern that development of the site is a foregone conclusion.

#### Observation:

The development provides an opportunity to improve the area to reflect the rural character. The development will have minimal impact on the visual aspects of the village.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The identification of Tuddenham as a small village in the Settlement Hierarchy is based upon the methodology contained in the Settlement Hierarchy Topic Paper, which considers the availability of services and facilities.

Suffolk County Council, as Highways Authority, have been consulted in relation to the access and a requirement for a pedestrian link onto Keightley Way is included in the policy.

The number of dwellings on the site has been reduced from 35 to 25 in reflection of concerns around the level of development on the site, particularly in relation to traffic.

The design of the development would be considered under Policy 11.1. Due to the location of the

site some distance from the Conservation Area it is not considered necessary to refer specifically to the Conservation Area in the policy, however Policy SCLP11.5 provides policy in relation to the Conservation Area and a proposal would be considered against that policy if relevant.

It is considered that provision for 25 homes would provide for a density appropriate to the location whilst also providing for green space and a link to the playing fields.

Reference to contributions towards school spaces and health care are included, with details contained in the Infrastructure Delivery Framework.

The alternative sites put forward have been considered. However, the availability of site 1154 'Land at Main Road and The Street' is uncertain and the site has highways issues which may be difficult to overcome. Site 1156 'Land at Wayside, Main Road' is below 0.2ha and therefore not considered large enough for allocation. None of the alternative sites would provide the opportunity to enhance access to the playing fields.

The policy includes a requirement for affordable housing on site, and supports the provision of semi detached and terraced properties which may also assist with affordability. The development would also need to meet the requirements set out under Policy SCLP5.8 in relation to housing mix.

## Policy SCLP12.64 Land south of Lower Road, Westerfield

Total comments	Support	Object	Observation
8	1	2	5

### Statutory Consultees

Suffolk County Council comment that mapping of surface water flood risk identifies that a significant portion of the site is within the 1:30 and 1:100 year flood areas. This will need to be considered and, as such, the policy requirement for a flood risk assessment should exceed the national standard currently set out in the Policy. Modelling of impacts on receptors will be required. There must not be any filling or obstruction of the flood plain. The proposed clause c) should be deleted and replaced with the following: c) 'The recommendations of an agreed flood risk assessment which has considered impacts on receptors off site'.

Suffolk County Council comment that extension of footway on Lower Road to site access and along frontage required. Cumulative traffic impact of this site and Ipswich Garden Suburb on this area should be considered.

Suffolk County Council comment that Rushmere Hall Primary is currently forecast to exceed capacity, due to pupils arising from the Ipswich Garden Suburb Development. Given that this development will provide its own primary schools, it is envisaged that Rushmere Hall and the new primaries will, between them, have sufficient capacity to accept these additional pupils. This will need to be reviewed as the Plan is developed further, and as Ipswich Garden Suburb comes forward, in order to ensure that places can be provided. Northgate High School is expected to exceed capacity, with new provision due to be made at Ipswich Garden Suburb. Between them, these schools should be able to make provision for these pupils, although it should be expected that a contribution would be required.

### Parish and Town Councils

None received

### Other organisations

Suffolk Wildlife Trust comment that there are records of protected species adjacent to this site, and appropriate habitat on site to support such species. Therefore, the Policy must secure ecological survey and assessment of the site and the implementation of any necessary mitigation and/or compensation measures. Ecological enhancements should also be secured as part of any development in this location.

### Developers/Landowners

None received

### Members of the Public

Lack of joined up planning along with other developments in SCDC and in neighbouring Ipswich. SCDC has recently asked for the Cubitts development to be increased from 35 to 75 dwellings meaning a total of 90 additional homes are planning for Westerfield. In addition, the Northern Fringe development means thousands of houses on Westerfield Road. Travel plan for entering and exiting the village needs to consider cumulative development and reflect the level crossing being down for an increased amount of time to serve an increase in freight trains.

**How these comments have been taken into account in the Final Draft Local Plan:**

The policy has been amended to incorporate Suffolk County Council suggested flood risk assessment wording.

Policy wording has been amended that an extension to the footway on Lower Road is required along the site frontage.

The supporting text to the policy and the FDLP Infrastructure Delivery Plan set out the approach to education provision that is subject to ongoing engagement with SCC.

Policy wording has been amended in relation to the requirement for ecological survey and necessary mitigation.

The Final Draft Local Plan is informed by transport modelling and ongoing engagement with Suffolk County Council. Infrastructure requirements are included alongside the policy.

## Policy SCLP12.65 Land west of the B1125, Westleton

Total comments	Support	Object	Observation
75	4	62	9

### Statutory Consultees

Natural England observe that development of this site will need a project level Habitats Regulations Assessment. Furthermore, design and landscaping should incorporate principles of net gain and include green space to take account of the site's location in the setting of the protected landscapes.

Suffolk County Council emphasise the need for footways and pedestrian crossing on Reckford Road and the need for extension to the 30mph limit, which it is stressed will result in significant cost and time implications.

Suffolk County Council comment that Middleton Primary School and the two catchment secondary schools have sufficient capacity to accommodate development emanating from the site.

### Parish and Town Councils

Westleton Parish Council support the strategy for 'rural areas', under which Westleton applies. The Parish Council has taken strides to provide a mix of housing for those in most need. The Parish Council has also commissioned an affordable housing needs survey by Suffolk Acre (now Community Action Suffolk) which has helped in their housing scheme proposals. In identifying sites for residential development, a S106 agreement with Hastoe Housing for affordable housing has been agreed, the transfer of land to the Parish Council and plans from Hastoe Architects are currently being progressed. Additionally, Glebe Meadow Westleton is a Community Interest Company established by residents to buy the redundant Vicarage in the heart of the village and convert it into a social hub for a new development of 20 modern, age appropriate homes for locals aged at least 65. Agreement has been reached with the diocese on the purchase price and an agreement is about to be signed. More information can be found at [www.glebemeadow.co.uk](http://www.glebemeadow.co.uk).

Considering the two aforementioned development sites that plan to provide 32 dwellings, of the mix identified in the needs survey, the Parish Council consider the proposed Site Allocation would lead to an unsustainable increase in the population and is poorly located in regard to insufficient and unsafe pedestrian access. Other issues with the proposed site include the following; incidents of speeding outside the site, lack of parking spaces in the village in light of the poor pedestrian connectivity to the site and the neighbouring safe pedestrian access, the prominent nature of the site in particular in relation to the adjacent conservation area, and cumulative flood risk. It is considered the most suitable site in the village is Site 371, for which there is also community support.

### Other organisations

The RSPB raise concerns regarding the proximity of the site to the Minsmere-Walberswick SPA. The Habitats Regulations Assessment statement in the supporting text should be moved into the policy text. They state a full appropriate assessment will be needed in order to evaluate whether the

adverse effects of development could be mitigated. The mitigation will need to be more than a contribution to the RAMS.

Suffolk Wildlife Trust state the site is adjacent to Westleton County Wildlife Site, and as such the potential impacts on the county wildlife site, or any of the habitats or species which it supports must be required in order for development to be acceptable.

East Suffolk Liberal Democrats state the proposed site allocation has a number of constraints, including; poor pedestrian access into the village, flood risk, and the prevalence of speeding on Reckford road. However, they also emphasise the need for Westleton to accommodate housing development, particularly for elderly people and affordable housing for local people.

### **Developers/Landowners**

E R Winter & Son support the proposed site allocation and state the site is suitable, available, and achievable, in line with the NPPG. Savills have provided an illustrative Site plan, in Appendix 1 of their consultation representation, which details the provision of sustainable development in line with the proposed site allocation policy. Savills emphasise their desire to provide a high quality scheme that is sympathetic to Westleton Common, heathland, and the Conservation Area. Savills note that services including electricity, mains water, foul sewerage, and telecommunications are easily connectable and readily available. Savills conclude by stating there is not a significant adverse impact with regards to delivery of the site for residential development.

Northchurch Ltd object to the proposed site allocation and suggest replacement with an alternative allocation that can deliver the benefits of the proposed site allocation without the adverse impacts of developing the B1125 site. The alternative site being promoted is site 371 on Darsham Road. Evolution detail a number of reasons why they believe Site 371 is more suitable than the proposed site allocation. These being; safer location for pedestrian access into the village, visual impact of development on an open site in the countryside not screened by natural barriers, the impact on Westleton Conservation Area, flooding constraints, development on 'brownfield' land, and support from the Parish council. Evolution Planning also query the justification for the level of housing proposed on the B1125 site. Evolution attached at transport assessment and proposed layout to the Local Plan consultation representation.

### **Members of the Public**

#### Support:

Member of the public support the proposed site allocation as it is deemed the best site available for development with good connectivity to the village.

#### Object:

Respondents comment that agricultural land should not be developed.

A number of respondents comment that other residential development proposals in the village are preferred by local community and could meet the housing numbers including 20 elderly person houses on Glebe Meadows (site 887) and 15 on the Cherry Lee site (371) and 12 by Hastoe Housing. Houses should be developed in Leiston. Utilise brownfield land within the settlement boundary.

Development at Cherry Lee site (site 371) has dangerous access and poor pedestrian access into the village.

A large number of respondents comment that development should be in larger villages.

Respondents comment that development will be detrimental to wildlife and habitats and query whether the equivalent Habitats Regulations be in place when Britain leaves the EU.

Respondents comment that there is no school in Westleton.

Respondents comment that there are limited employment opportunities.

Respondents comment that there are limited facilities, the village store is not able to cater for the proposed increase in population, there is only 1 local shop and development will stretch village facilities.

A large number of respondents have raised concern over the risk of flooding.

A large number of respondents comment that there are no footpaths to connect site to village, the narrow footpath along the road outside the site is 'unsafe' and there is no room for footpath outside site.

A large number of respondents raise concern in relation to increased traffic, speeding and difficulties crossing the road.

Respondents comment that there are no doctors or dentists in the village.

A number of respondents raise concerns over the number of second homes and ensuring new housing does not become second homes.

Respondents query how much affordable housing will be guaranteed, are concerned that housing will be built and sold as holiday homes, and query whether there will be a requirement attached to the planning application and houses so they can only be use for permanent residency. Respondents state there is no need for housing in Westleton.

Concern that development of the site will set a precedent for further development into the field.

A number of respondents comment that the development would destroy the local character of this entrance to the village, development should be sympathetic to the character of the village and development would have a detrimental impact on the adjacent conservation area. Respondents raise concerns over loss of countryside.

Respondents raise concerns over limited car parking in the village.

Concern over light pollution from development.

Respondents comment that road access is poor.

A number of respondents comment that there is no or limited public transport

Respondents raise concerns over residential amenity.

Respondents comment that it is too much development for Westleton.

Respondents comment that development of this site will reduce the attraction of the village to tourists.

Respondents comment that sewerage and drainage infrastructure is under pressure, drainage issues on site.

A number of respondents support Westleton Parish Council's response.

Observation:

Other residential development proposals in the village are preferred by local community and could meet the housing numbers.

There is no connecting footpath outside the site into the village.

The road outside the site is well known for speeding and pedestrians find it difficult to cross the roads due to speeding traffic and increased traffic.

**How these comments have been taken into account in the Final Draft Local Plan:**

The site has been reduced in size to follow the existing built form of the southern extent of Westleton Conservation Area in order to reduce the impact development will have on Westleton Common County Wildlife Site both visually and recreationally. An additional site, Cherry Lee fronting Darsham Road, has been allocated in order to satisfy community support for the site and to deliver growth in a sustainable settlement that benefits from a good community offer.

The drawing of the site boundary just to the south of the existing built form of the eastern side of Reckford Road is to facilitate the provision of significant landscaping along the southern and western boundaries.

Early years provision in Wenhaston and Westleton Ward is forecast to be over capacity and therefore a contribution will be required through the Community Infrastructure Levy towards expansion of existing settings, as set out in the Infrastructure Delivery Framework.

The generated primary and secondary school aged students from development of this site along with the newly allocated Cherry Lee site can be accommodated within Middleton Primary School and the two catchment secondary schools.

Pedestrian connectivity with the existing footway network is to be enhanced, as stated in the policy and the Infrastructure Delivery Framework.

The site is within Flood Zone1 although does have recorded surface water flooding across the site, which is reflected in the policy.

There is no evidence to suggest the proposed increase in the number of dwellings in the village will lead to an unsustainable increase in the population. The strategy of the Plan seeks to sustain rural communities by allocating some growth.

Reference has been included to requirements arising from the Water Cycle Study.

In relation to speeding traffic, Suffolk County Council advise that it may be necessary to extend the speed limit. The planning system is not able to enforce speeding, however consideration has been given to the potential for accidents in assessing sites through the Strategic Housing and Employment Land Availability Assessment.

Any requirements arising from the HRA have been addressed through the policy and supporting text. Biodiversity net gain is referred to in Policy SCLP10.1, as informed by the HRA.

## Policy SCLP12.66 Mow Hill, Witnesham

Total comments	Support	Object	Observation
5	0	1	4

### Statutory Consultees

Suffolk County Council comment that there is a highways requirement to remove hedgerows to provide required visibility splays and footway frontage/ connectivity conflicts with point B of the draft policy. A pedestrian crossing point on Mow Hill should also be provided.

Suffolk County Council comment that the site of Witnesham Primary School is large enough to consider expansion and so contributions are likely to be sought. Claydon High School is currently forecast to exceed its capacity, although there is some ability to expand. Longer term needs along the A14 corridor will be considered as part of the Babergh/Mid Suffolk Local Plan. This suggests that these sites should expect to contribute to secondary school provision.

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Object:

Existing development in the village has caused significant disruption to residents, noise pollution, loss of view and impacts on house prices.

The impact on infrastructure has not been considered.

#### Observation:

Clarity is required in the site size as the policy states 1.17ha whilst site 774 is 0.91ha and site 775 is 0.62ha.

The site is in agricultural use.

Access onto the highway is dangerous due to the steep slope of the hill and the approach from both directions.

The site is bounded by a dwelling on one side only.

**How these comments have been taken into account in the Final Draft Local Plan:**

The supporting text and policy wording in respect of pedestrian connectivity and access provides flexibility to require feasibility of a pedestrian crossing.

The site allocation provides for growth of the village that is integrated and sensitive to settlement and open agricultural landscape character.

Development would also be considered against Policy SCLP11.2 Amenity.

Infrastructure requirements are incorporated alongside the Policy.

The site area in the First Draft Local Plan related to the area proposed for allocation which was smaller than the sites submitted.

It is noted that the site is bounded by one dwelling, however is considered to represent a logical extension to the settlement.

Impacts on agricultural land have been considered through the Sustainability Appraisal, however within the District there are limited opportunities for appropriate development on brownfield sites.

## Policy SCLP12.67 Land at Street Farm, Witnesham

Total comments	Support	Object	Observation
6	1	0	5

### Statutory Consultees

Environment Agency agree with Paragraph 12.497 on page 331 that as part of the site is in Flood Zone 3 a site specific flood risk assessment will be required for any development proposed on this site.

Suffolk County Council comment that existing access may not be suitable for significant intensification of use as a residential access due to lack of footway connectivity and potentially limited visibility. It also may be difficult to locate a necessary pedestrian crossing point far away enough from the nearby bend to achieve the required visibility.

Suffolk County Council comment that the site of Witnesham Primary School is large enough to consider expansion and so contributions are likely to be sought. Claydon High School is currently forecast to exceed its capacity, although there is some ability to expand. Longer term needs along the A14 corridor will be considered as part of the Babergh/Mid Suffolk Local Plan. This suggests that these sites should expect to contribute to secondary school provision.

### Parish and Town Councils

None received

### Other organisations

Suffolk Wildlife Trust comment that the site is bounded to the north by the River Fynn, a UK Priority habitat. The potential impact of any development at this site must be assessed and appropriate mitigation and/or compensation measures secured. Ecological enhancement measures should also be secured as part of any allocation.

### Developers/Landowners

None received

### Members of the Public

#### Observation:

This site is likely to be prone to flooding. Flash flooding is becoming more common and the site is a potential valuable water run-off area.

**How these comments have been taken into account in the Final Draft Local Plan:**

The policy includes a requirement for a site specific flood risk assessment.

The supporting text and policy wording in respect of pedestrian connectivity and access provides flexibility to require feasibility of a pedestrian crossing.

The policy includes a criteria in provision of an ecological assessment in relation to potential impact on the River Fynn, and opportunities should be explored which would improve and enhance the riverside environment in this location under the Water Framework Directive.

Infrastructure requirements have been included alongside the policy.

## 13 Delivery and Monitoring Framework

### Delivery and Monitoring Framework

Total comments	Support	Object	Observation
2	0	0	2

#### Statutory Consultees

None received

#### Parish and Town Councils

None received

#### Other organisations

None received

#### Developers/Landowners

Gladman Developments Ltd comment that evidence will be required to demonstrate that the Plan can be delivered and that sites are viable. Specific mechanisms should be included within the monitoring framework to demonstrate how the Local Plan will adapt to rapid change and identify how it will positively address any under-delivery. This could include a 20% contingency. This would assist the sustained delivery of housing over the plan period, support the maintenance of a rolling five year housing land supply and reduce the likelihood of a circumstance during the plan period where the housing delivery test cannot be met.

#### Members of the Public

Observation:

To be deliverable by engagement, it is not considered appropriate that the public are only allowed 3 minutes to speak (and only one person). The plan is biased against the public.

Concern that the Authority Monitoring Report wont be monitored and there are many inaccuracies in the plan including the requirements for land.

#### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan is supported by a monitoring framework, policy delivery framework and infrastructure delivery framework. Collectively these support the policy requirements and site allocations within the Final Draft Plan and ensure that the Council has the appropriate measures in place to monitor the delivery of the plan as well as being clear about infrastructure requirements.

The Appendices supporting the Final Draft Local Plan provide the basis for the Authority Monitoring Report which the Council produces annually. The AMR is published each year on the Council's website and is a long established monitoring document which will be revised to reflect the final policy requirements, indicators and monitoring targets outlined in the Final Draft Local Plan following adoption.

Public consultation and engagement on the Local Plan is outlined in the Council's Statement of Community Involvement. This details the methods used by the Council to encourage engagement and participation in plan making. Reference to 3 minutes of speaking time only relates to public participation at Planning Committee's and not the Local Plan process.

# 14 Infrastructure Delivery Framework

## Infrastructure Delivery Framework

Total comments	Support	Object	Observation
21	2	11	8

### Statutory Consultees

Suffolk County Council have stated the following in their response:

- The Suffolk Fire & Rescue Service do not consider there to be a need for additional service provision based on the level of growth proposed in the Plan.
- Adequate water supply will need to be included in any new development in consultation with the Suffolk Fire & Rescue Service water officer and access will not be objected to as long as it is in accordance with building regulation guidance.
- The County Council has a contract with Suffolk Libraries IPS Ltd to deliver library services across the County.
- The Plan needs to provide for community facilities where needed, ensuring that contributions can be made towards library provision as part of that provision. However, no new stand-alone libraries are sought for this scale and distribution of growth.
- They will seek contributions from development (via CIL) in order to bring forward incremental improvements at existing libraries, and will work with Suffolk Coastal to understand the scale of contribution which is expected to be required.
- At Saxmundham, the nature of the current provision means that the County Council is seeking opportunities to improve the library offer.
- They would consider opportunities for the relocation of Leiston Library if funding and a suitable project were to become available. CIL funding would be sought in these circumstances.
- The figures identified as the cost of library improvements in the Infrastructure Delivery Framework are not appropriate for the lifetime of the Plan (to 2036). The County Council will work with Suffolk Coastal to identify indicative costs for library improvements in the Plan period.

### Parish and Town Councils

Kettleburgh Parish Council **objected** to the omission of any reference to the Framlingham Sewage/Water Treatment Works as they have a specific issue with its pumping station. The works also serve Brandeston and Cretingham (amongst others). They have also listed the following issues in an attachment:

- Reference is made to a Hearing Statement from an examination in August 2016 which states that further development in Badingham and Dennington should not be permitted until the Framlingham Water Recycling Centre complied with its environmental permit.

- The fact that ‘weekend’ homes can and have become occupied on a full time basis means that demand for services could in fact be a lot higher than projected as these homes are not considered to come within the housing stock.
- If 16 houses were to be built in Kettleburgh, there would be a greater risk of overflow discharges due to the current need for tankers to be used occasionally during heavy rainfall, which demonstrates an element of frailty in the installation.
- Assurances are required that Anglian Water shall be required to carry out any identified upgrades to the capacity of the Framlingham Works and ensure that the Kettleburgh Pumping Station is maintained/improved to eradicate the apparent frailty that currently exists.
- Concerned that development at Kettleburgh will exacerbate an existing surface water drainage flooding problem.

Benhall & Sternfield Parish Council state in their response that the Infrastructure Delivery Plan should include evidence that the appropriate agencies have been involved in the formulation of the Plan and a clear indication of the issues and how they will be addressed. Otherwise the public will have no confidence there that essential services will not be compromised as a direct result of development. Positive solutions need to be provided.

Rendlesham Parish Council questioned some of the figures in the Health section of the Infrastructure Delivery Framework.

Marlesford Parish Council highlighted the fact that there is no indication in the plan about how the A12 four villages bypass is considered ‘essential’ i.e. how will it help to ameliorate the high unemployment rates at the northern end of the A12? There is also no mention of the increased importance of this road scheme in light of EDF dropping their proposal to build a sea-jetty at Sizewell and not to improve the rail link into the site.

### **Other organisations**

The Suffolk Constabulary proposed the inclusion of the following for the North Felixstowe Garden Neighbourhood and South Saxmundham Garden Neighbourhood:

- Additional police floorspace;
- Recruitment, training, equipping police officers/police community support officers/back office staff;
- 3 x police vehicles; and
- Automatic number plate recognition technology.

Hutchison Ports (UK) Limited suggested the inclusion of the term ‘Developer’ in place of the term ‘Port of Felixstowe’ for the table relating to Coastal Protection & Flooding.

### **Developers/Landowners**

None received

### **Members of the Public**

Support:

**Support** for the rail loop near Trimley for the Felixstowe train line.

Objection:

In Saxmundham, the roads are unable to cope with recent housing development and there are long waiting times at the doctor's surgery.

Caravan parks are a 'hidden' issue that is not accounted for in the Infrastructure Delivery Framework.

Saxmundham already has problems with water supply and the daily sewage is excessive to current systems. If there is a heavy rainfall the drains in Saxmundham spew sewage into the streets.

The recognition that the School at Benhall needs to increase capacity does not address issues of parking, safety of students, impact on Village with motors idling their engines awaiting pick up for the School run

Disputes the assumption that a new leisure facility that requires the abandonment of the existing facilities is necessary in Felixstowe.

**Objection** to the new primary school at Trimley St Martin as this will be at the expense of the existing school which has an excellent record of schooling.

Questions the inclusion of infrastructure where things have yet to be decided i.e. site allocations and Brexit.

**Objection** to the inclusion of the four villages improvements as it will ruin part of the adjoining AONB and make access difficult for residents.

Improvements to the Benhall Water Recycling Centre includes unknown time frames and funding sources.

The Plan overlooks the potential for improving the minimal rail services currently available through investment in the Ipswich – Lowestoft line.

As soon as Sizewell C and/or the Friston sub-station are known to be proceeding, the 'A 12 - Four Villages improvements' should be upgraded to 'Essential' and the timescale revised accordingly.

Observation:

There are too many unknowns in the plans.

Health and schooling should be in place before development.

"Significant access improvements and improvements to the wider at Land at Felixstowe Road (SCLP12.3)" needs to be corrected as it doesn't make sense.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Council, in consultation with Suffolk County Council and other infrastructure providers, has revised the Infrastructure Delivery Framework.

The Suffolk Coastal & Ipswich Borough Water Cycle Study shows that upgrades are required at Framlingham and Benhall Water Recycling Centres as a result of growth proposed in the Local Plan. This is reflected in the revised Infrastructure Delivery Framework. Likewise, Policies SCLP12.54 and SCLP12.29 require evidence to demonstrate that there is adequate capacity in the Water Recycling Centre.

Health costs in the Infrastructure Delivery Plan are indicative based on consultation with the Ipswich & East Suffolk Clinical Commissioning Group and the NHS. Where costs relate to Surgeries that have branch practices, the costs have been combined to reflect the fact that Surgeries and their branch practices are treated as one entity because they share a patient list.

The A12 four village bypass has been included in the Infrastructure Delivery Framework based on available information at the time. Delivery of this scheme is also supported by numerous policies throughout the plan.

The Infrastructure Delivery Framework was amended to include details and costs relating to required police infrastructure as a result of development proposed in the Local Plan.

Wording in the Coastal Protection & Flooding section of the Infrastructure Delivery Framework amended to reflect the lead providers and funding sources.

Transport modelling has shown that there are no unmitigatable impacts from growth proposed in the Local Plan at Saxmundham.

No growth is proposed in this Local Plan relating to caravan parks and infrastructure providers have not expressed concerns with the capacity of infrastructure in respect of caravan parks.

The Infrastructure Delivery Framework identifies a need for 301 square metres of additional primary care floorspace at Saxmundham Surgery as a result of development proposed in the Local Plan.

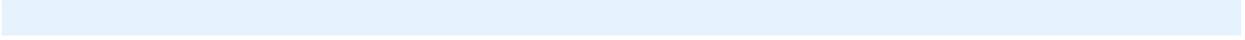
The issue of parking, safety of students, impact on the village with motors idling their engines awaiting pick up for the school run at Benhall will be dealt with at the planning application stage.

The Suffolk Coastal District Council Leisure Redevelopment Programme identifies a need for a new leisure facility at Felixstowe. It is considered that the North Felixstowe Garden Neighbourhood provides an opportunity to fulfil this need.

A new primary school at Trimley St Martin has been included in the Infrastructure Delivery Framework based on evidence provided by Suffolk County Council.

Discussions with Greater Anglia have confirmed the requirement for proposed growth in the Local Plan to contribute towards access improvements at rail stations and enhancement of ancillary rail station facilities. Greater Anglia have indicated that there will be other investment in the Ipswich – Lowestoft rail line that is not reflected in the Infrastructure Delivery Framework.

The Infrastructure Delivery Framework represents required infrastructure based on development proposed in the Local Plan. Costs and timescales, in this respect, are indicative based on the information available at the time.



# Appendices

## Appendix A

### Housing Trajectory

Total comments	Support	Object	Observation
3	1	2	0

#### Statutory Consultees

None received

#### Parish and Town Councils

None received

#### Other organisations

None received

#### Developers/Landowners

Suffolk Constabulary comment that realistic assumptions about the commencement of development and annual housing delivery rates are applied for the strategic developments North of Felixstowe Garden Neighbourhood and South Saxmundham Garden Neighbourhood. It is also requested that small and medium sites in sustainable locations, which can be delivered quickly and help to maintain a deliverable housing land supply, should be allocated.

Suffolk Constabulary comment that revisions to national planning guidance put a greater emphasis on delivery. The strategy should actively encourage the development of small and medium sized sites.

Housing delivery rates at the Brightwell Lakes development should be reduced to a maximum of 160 dwellings per annum once the initial phases have been completed and the development is established, and that the start date for development should be put back until 2020/21 at the earliest. 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) identifies a delivery rate of 161 dwellings per year. Housing developments in Colchester assume delivery rates of 150 dwellings per annum.

#### Members of the Public

Object:

50 houses proposed over a three-year period all on one site does not support the organic growth Benhall Village. The site represents too many houses in one location. *(Comments also made against SCLP12.39)*

**How these comments have been taken into account in the Final Draft Local Plan:**

The housing trajectory considers deliverability and availability information submitted with sites, as well as any likely constraints on delivery, as reported in the Strategic Housing and Employment Land Availability Assessment.

The trajectory in relation to Brightwell Lakes is based upon a conservative view of the information supplied by the developer, as set out in the Council's Housing Land Supply Statement (2018).

## Appendix B

### Marketing Guidance

Total comments	Support	Object	Observation
0	0	0	0

#### **Statutory Consultees**

None received

#### **Parish and Town Councils**

None received

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Appendix C

### Criteria for Identification of Non Designated Heritage Assets

Total comments	Support	Object	Observation
0	0	0	0

#### **Statutory Consultees**

None received

#### **Parish and Town Councils**

None received

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Appendix D

### Viability Requirements

Total comments	Support	Object	Observation
0	0	1	0

#### Statutory Consultees

None received

#### Parish and Town Councils

None received

#### Other organisations

None received

#### Developers/Landowners

Ettwein Bridges Architects comment that the viability requirements are not appropriate for use in Enabling Development calculations.

#### Members of the Public

None received

#### How these comments have been taken into account in the Final Draft Local Plan:

The requirements outlined in the viability guidance may be relevant when considering enabling development as a whole.

## Appendix E

### Landscape Character Maps

Total comments	Support	Object	Observation
0	0	0	0

#### **Statutory Consultees**

None received

#### **Parish and Town Councils**

None received

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Appendix F

### Glossary

Total comments	Support	Object	Observation
0	0	0	0

#### **Statutory Consultees**

None received

#### **Parish and Town Councils**

None received

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Appendix G

### Policies to be Superseded

Total comments	Support	Object	Observation
0	0	0	0

#### Statutory Consultees

None received

#### Parish and Town Councils

None received

#### Other organisations

None received

#### Developers/Landowners

None received

#### Members of the Public

None received

#### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Appendix H

### Alternative Policy Options

Total comments	Support	Object	Observation
0	0	0	0

#### **Statutory Consultees**

None received

#### **Parish and Town Councils**

None received

#### **Other organisations**

None received

#### **Developers/Landowners**

None received

#### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Appendix I: Alternative Sites

### Aldeburgh

Total comments	Support	Object	Observation
4	2	1	1

#### Statutory Consultees

None received

#### Parish and Town Councils

None received

#### Other organisations

None received

#### Developers/Landowners

M S Oakes comment that site 414 'Former Reades Brickworks, Saxmundham Road' is available, suitability and capable of delivering 43 dwellings including 14 affordable dwellings. The site is the only one within Aldeburgh capable of delivering sufficient market and affordable housing in Aldeburgh to address the recognised social imbalance. Support the principle of the Council in exploring all reasonable options to meet Objectively Assessed Needs. House prices in Aldeburgh are 2.3 times higher than the District average. There are only four sites in Aldeburgh in the Council's Housing Land Supply and includes only 6 affordable dwellings. The reasons for not including the site are unfounded and not supported by the views of the officers in relation to the planning application.

Armstrong Rigg Planning - put forward a site of 1ha, site 904 'Land to the north of 175 Saxmundham Road', for residential development to be considered for allocation in the Local Plan.

#### Members of the Public

The landowner of site 640 'Land between Roos and Saxmundham Road' has identified the site as unavailable for development.

#### How these comments have been taken into account in the Final Draft Local Plan:

Site 414 is judged to be not a potential site in the Strategic Housing and Employment Land Availability Assessment due to the range of environmental constraints. The appeal in relation to site 414 has recently been dismissed. It is therefore not considered appropriate to allocate the site.

Site 904 'Land to the north of 175 Saxmundham Road' is identified as being unsuitable in the SHELAA due to loss of the County Wildlife Site. It is not therefore appropriate to allocate the site for development.

The Strategic Housing and Employment Land Availability Assessment has been amended to reflect that site 640 'Land between Roos and Saxmundham Road' is unavailable.

## Alderton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Aldringham cum Thorpe

Total comments	Support	Object	Observation
1	0	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Thorpeness and Aldeburgh Hotels Ltd promote site 981 'Land off Aldringham Road, Aldringham cum Thorpe' for a mixed use development incorporating 65 dwellings (including affordable) and a sports offering, as part of the golf club and country club. They comment that they have also engaged with Aldringham cum Thorpe regarding their Neighbourhood Plan.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Council notes that site 981 'Land off Aldringham Road, Aldringham cum Thorpe' is promoted, however Policy SCLP12.1 sets out the policy approach for any future development to be planned for through the Neighbourhood Plan.

## Badingham

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Evolution Town Planning Ltd comment that Site 503 is available for 15 dwellings. It is stated that the site is unconstrained and immediately available. It is commented that the site is near to the centre of the village and bus stops. It would contribute towards sustainable rural housing growth in Badingham.

#### How these comments have been taken into account in the Final Draft Local Plan:

The Council has considered the comments submitted however the conclusions in relation to the site are considered to remain and the site is therefore not identified as an allocation.

## Bawdsey

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Simper Farms promote site 455 'Land fronting The Street, Bawdsey' and propose an amended site boundary which excludes the southern part of the site which is subject to a planning application by Orwell Housing. The site would complement Orwell Housing's application through meeting a need for modest open market housing through a mix of 2 and 3 bedroom dwellings to enable downsizing and provision of small family homes. There are no physical constraints, sustainability issues or land ownership issues.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The revisions to site 455 'Land fronting The Street, Bawdsey' have been reassessed through the Strategic Housing and Employment Land Availability Assessment. The site remains a potentially suitable site, however its allocation would pre-empt any decision in relation to the planning application for the site to the south and the strategy for this Local Plan seeks to direct most growth outside of the Deben peninsula.

## Benhall

Total comments	Support	Object	Observation
2	0	1	1

### Statutory Consultees

None received

### Parish and Town Councils

Benhall and Sternfield Parish Council suggest an alternative strategy to SCLP12.39, including the dispersal of housing across a number of previously identified sites (493, 507, 247, 817, 818). It is proposed that the eastern half of site 493 (proposed under SCLP12.39) be provided as open space to maintain a separation between proposed and existing dwellings and provide amenity space for all residents.

### Other organisations

None received

### Developers/Landowners

Hopkins Homes confirm the availability of Site 493 and promoted the site for residential development.

### Members of the Public

Suggestion that the proposed site allocation altered to shift development to the west and make provision for a large area of open space between the proposed development and the existing village extent. It is suggested the eastern most extent of development on the proposed site should be in line with the recent development to the north. *(Note, comments also submitted under SCLP12.39).*

### How these comments have been taken into account in the Final Draft Local Plan:

The sites suggested have not been identified as potential sites in the Strategic Housing and Employment Land Availability Assessment, however comments in relation to the proposed allocation under Policy SCLP12.39 have been considered and amendments to the allocation are included in the Final Draft Local Plan. Refer also to the analysis of responses received in relation to Policy SCLP12.39.

Site 493 is allocated for 50 homes in policy SCLP12.44: Land south of Forge Close between Main Road and Ayden, Benhall.

## Blaxhall

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Landowners comment that the two sites (649 'Station Road, Blaxhall' and 650 'Mill Common, Blaxhall') provide the opportunity for Blaxhall to expand its housing supply in a sustainable and planned manner which will deliver the types and designs of housing appropriate to the village. It is commented that there are few windfall opportunities in Blaxhall and therefore allocations are needed to address housing issues raised by the community. New housing could meet the needs of the elderly, family homes or homes for young people. There are no planning or environmental constraints. The development of housing on the sites could support local facilities. Footpaths and landscaping could be provided. Site 649 could provide a footpath to the village hall, and landscaping on land in the client's ownership to the south. The sites are immediately available and deliverable and development could be phased to meet local needs and the Government's intention for all settlements to play a role in delivering sustainable development in rural areas.

Roxylight Holdings promote an enlarged site 427 'Land south of Old Post Office Lane'. It is stated that the increase in size provides scope for more dwellings plus community benefits such as alternative allotment space. The allotments are in private ownership, but through redevelopment of the site provision of allotments could remain in perpetuity. The site could deliver more than ten dwellings and could provide affordable housing, and the respondent would engage with the local community to ensure that scheme is in keeping with the character and appearance. Blaxhall should be a Small Village and the settlement boundary reinstated (*note respondent has also commented under SCLP3.3 Settlement Hierarchy and SCLP3.4 Settlement Boundaries*).

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

It is not considered appropriate to allocate sites in the countryside, consistent with paragraph 77

of the NPPF which states that development should be located where it will enhance or maintain the vitality or rural communities and will support local services.

## Blythburgh

Total comments	Support	Object	Observation
1	0	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Blythburgh Estate and Badger Homes promote site 1112 'Land south of London Road' for residential development. The indicative plans show an area in the eastern part of site 1112 with the intention to provide 5 dwellings of high quality design, in light of the site's heritage significance.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Considering the heritage constraints, it is not considered appropriate to allocate site 1112.

## Boyton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Bramfield

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Geo Estates Ltd promote land south of Pitman's Grove, Bramfield (new site ref 1160) for residential development. Bramfield is a large village and has good access to the A12, bus services and facilities. Bramfield has not historically contributed to market or affordable housing, and this is being perpetuated by the Local Plan. The site would provide a mix of market and affordable housing. There are opportunities to enhance local facilities such as a playing field with links to the primary school. Landscape impact is not significant due to the topography and unique features of this site. The site presents a sustainable alternative to other development in the Halesworth area or should the larger proposals in the plan not come forward.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Site 1160 'Land south of Pitman's Grove, Bramfield' is identified as unsuitable in the Strategic Housing and Employment Land Availability Assessment and is therefore considered for allocation in the Local Plan.

## Brandeston

Total comments	Support	Object	Observation
2	0	1	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Lord Cunliffe comments that much of the land south of the village is owned by himself and he would be prepared to make suitable sites available on similar terms however states that he was not aware of the request for land.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The sites put forward are promoted for affordable housing, and would therefore be more appropriately considered through policy on Exception Sites (SCLP5.11).

## Bredfield

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Brightwell

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Bromeswell

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Bucklesham

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Landbridge submit a concept plan showing that site 1028 'Land north of White House, The Street' could be made available for a low density scheme of individual village housing of 6-10 units. This could include self/custom build plots and community open space / allotments. The current preferred option (policy SCLP 12.41) would provide more housing than the village would require. With the larger scale developments being proposed near Felixstowe, there is a requirement within Bucklesham for 5 – 15 houses maximum.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan allocates one site in the village south east of Levington Lane for approximately 30 dwellings to contribute towards evidenced District housing requirements. Based on environmental site assessment checks in the Strategic Housing and Employment Land Availability Assessment site 1028 is characterised by environmental constraints (landscape, biodiversity, historic environment, surface water flooding) which whilst not insurmountable would not indicate the site is preferable to the site allocation south east of Bucklesham Road.

## Burgh

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Butley

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Campsea Ashe

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Charsfield

Total comments	Support	Object	Observation
2	1	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

In relation to Site 102 'Land adjacent to Charsfield Primary School' it is commented that the layout plan submitted with the earlier representation was for indicative purposes only. The landowner comments they have a flexible and sympathetic approach to design and wished to enhance the village, including provision of car parking for the school. The landowner strongly supports the need for the design to reflect the importance of the setting of the church. The site is close to village services.

### Members of the Public

#### Object:

Site 102 'Land adjacent to Charsfield Primary School' is totally unsuitable. It would very materially affect the only distant view of the Grade I Listed church and it would not be possible to overcome this. It would very materially affect the houses to the north of the church. It is a key landscape view within Charsfield from the highway across and down the valley. Trust it will never seriously be considered. There has been a long period of uncertainty causing issues around the ability of people to move.

Site 890 'Land South of Springfield House, Chapel Lane' is totally unsuitable. The steep rise of land from Chapel Lane corner would mean that any housing development would be highly intrusive. Highways access would be hazardous. It would affect the landscape in the context of the chapel. There has been a long period of uncertainty causing issues around the ability of people to move.

Site 812 'Land behind 15 St Peters Close' is not as good as sites 813 'Land adj to Highfields, Davey Lane', 318 'Land at and surrounding Highfields, Davey Lane' and 814 'Land between Davey Lane and Church Lane'. The nature of Davey Lane lends itself to infilling without detriment to others and in accordance with planning considerations. It has seemed illogical that this area has not been developed. Safe and suitable access can be achieved from an improved Davey Lane or via an eastern

access from Church Road. Development of these sites would lead to a better balance in Charsfield.  
(*Objections to site 812 logged under SCLP12.43.*)

**How these comments have been taken into account in the Final Draft Local Plan:**

Site 102 has not been identified as an allocation due to the potential impact upon the Grade I St Peter's Church.

Site 813 is identified as being below the site size threshold for allocation in the Strategic Housing and Employment Land Availability Assessment, and has therefore not been considered for allocation.

Site 814 is identified as unavailable in the Strategic Housing and Employment Land Availability Assessment, and has therefore not been considered for allocation.

Site 890 is identified as potentially suitable through the Strategic Housing and Employment Land Availability Assessment however has not been proposed for allocation. Highways issues have been identified through the SHELAA.

## Chediston

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Chillesford

Total comments	Support	Object	Observation
5	1	4	0

### Statutory Consultees

None received

### Parish and Town Councils

Chillesford Parish Council comment that they support the conclusion that the sites shaded brown are not suitable development sites.

Site 703 'Site D, Land West of Pedlars Lane, Chillesford' is contrary to policy SCLP5.4 as it is in the countryside and is not in an existing cluster. There are problems of access and drainage on the site. Access is via an unadopted bridleway. Reductions in water pressure are already experienced. Policy SCLP5.4 requires local support, there is no local support for development of these sites.

Site 178 'Land off Pedlars Lane, adjacent to Hertfords Place' is inconsistent with policy SCLP5.4 as it does not form part of a cluster. Hertfords Place is a private road which has no capacity to take more development and the owners of existing properties are opposed to development of the site. There are problems regarding waste water relating to existing dwellings. Policy SCLP5.4 requires local support, there is no local support for development of these sites.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Object:

Site 178 'Land off Pedlars Lane, adjacent to Hertfords Place' is unsuitable as it is not well related to the village form, it would impact privacy of 3 and 4 Hertford's Place, result in noise disturbance, has no clear access and adjacent properties have had drainage issues.

Site 178 does not meet the definition of a cluster. There is no access other than via private land. It is an unsurfaced bridleway and the rain regularly washes away the surface. It is inadequate for current residences. It is outside the village envelope and development on it would change the character of the village forever. Chillesford is unsuitable for further development. There is permission for 20 houses in the village. It is thought that 75% of new houses that have been built are second homes. Chillesford has no facilities, extremely limited transport links and under new education transport policy every household will need a car. Drainage of rainwater and sewage is a problem. There is a

problem in Pedlar's Lane with fresh water pressure. There is no policy that will help with second homes.

Site 703 'Site D, Land West of Pedlars Lane, Chillesford' does not meet the definition of a cluster. There is no access other than via private land. It is an unsurfaced bridleway and the rain regularly washes away the surface. It is inadequate for current residences. It is outside the village envelope and development on it would change the character of the village forever. Chillesford is unsuitable for further development. There is permission for 20 houses in the village. It is thought that 75% of new houses that have built are second homes. Chillesford has no facilities, extremely limited transport links and under new education transport policy every household will need a car. Drainage of rainwater and sewage is a problem. There is a problem in Pedlar's Lane with fresh water pressure. There is no policy that will help with second homes.

**How these comments have been taken into account in the Final Draft Local Plan:**

The purpose of the Strategic Housing and Employment Land Availability Assessment (SHELAA) is to identify sites that are potentially suitable based upon the criteria for site assessment in order to ascertain whether there is sufficient land in the District to meet housing and employment land needs. Policy SCLP5.4 would apply to proposals for housing in the countryside if they came forward. Identification of a site as a 'potential' site in the SHELAA does not afford it any planning status.

Site 178 has been reviewed in terms of whether it is within, adjoining or well related to the settlement and it is considered that it accords with the criteria in the SHELAA.

Chillesford is identified as within the countryside in the Settlement Hierarchy in reflection of the limited availability of facilities. The Local Plan has not therefore looked to allocate sites in Chillesford.

## Clopton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Cookley

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Cransford

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Cratfield

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received.

## Cretingham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Darsham

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

A member of the public commented in promotion of Site 1130 'Land To The West Of Darsham Cottage, Main Road' as a sustainable location for development and as an alternative to the proposed sites in Darsham.

### How these comments have been taken into account in the Final Draft Local Plan:

Site 1130 is not identified as an allocation due to being proposed by EDF as a potential Park and Ride facility, however the supporting text identifies it as being potentially suitable for employment uses.

## Debach

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Dennington

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Dunwich

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Earl Soham

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

The landowner promotes the redevelopment of Site 383 'Land at Street Farm, Brandeston Road, Earl Soham' (brownfield site – currently a concrete batching plant) for residential development of 17 dwellings, 5 of which being affordable. The site adjoins the physical limits boundary. Redevelopment of the site will enhance the setting of a Grade II\* listed building and the character and appearance of the adjoining Conservation Area. It will add to the viability of services within the village.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Site 383 has been assessed in the SHELAA as not being within, adjoining or immediately adjacent the main contiguous built up area of the settlement. This has been reconsidered in light of the

The approach for Earl Soham is set out in Policy SCLP12.1 which identifies the Neighbourhood Plan as being the appropriate means by which new housing will be planned for in the village. The Local Plan does not therefore look to allocate sites in Earl Soham.

## Easton

Total comments	Support	Object	Observation
2	0	1	1

### Statutory Consultees

None received

### Parish and Town Councils

Easton Parish Council –

Site 740 'Kettleburgh Road, Easton' should be identified as undeliverable as it is outside the Physical Limits, adjacent to an Area to be Protected from Development and the Conservation Area, within the setting of Listed Buildings, poorly related to the village, has no access and would have a negative impact on the character of the area.

Site 739 'Sanctuary Field, Pound Corner' should be identified as undeliverable as it is outside the Physical Limits, adjacent to an Area to be Protected from Development and Conservation Area, within the setting of Listed Buildings, poorly related to the village, has no access and is partly within flood zone 3.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

#### Observation:

It is commented that these consultations are of little value. No notice is taken of any village input. The allocation appears to have been split between two landowners. Plots in the original draft have been ignored despite the Government directive for infill plots with no impact on the village to be preferred. The 18 properties being built on green belt land are totally out of keeping with the rural village of mainly single storey properties. Site 531 (*Note this site is in Bucklesham and there is no similar site number in Easton*) would not be seen from the road, would be single storey, in keeping with surrounding properties, not overlooked and in keeping with Government policy.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Under the SHELAA assessment, the matters identified in relation to sites 739 and 740 would not

place absolute constraints on the sites, however these are issues that would need to be assessed and considered through the site allocations process. A site being outside of the current Settlement Boundary should not render it unsuitable for allocation, as the Settlement Boundary would be revised to reflect any new allocations.

It is not clear which site is being referred to under site 531, as this reference number relates to a site elsewhere in the District. However, policy SCLP12.1 of the Local Plan identifies the Neighbourhood Plan as being the appropriate means for planning for Easton.

## Eyke

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Sites 280 'Land rear of The Old Mill House, The Street' and 279 'Land South of Manor Cottages, Castle Hill' are no more suitable than site 776 (proposed allocation) as they would struggle to provide added benefits.

Query whether site 423 'Church Farm, Eyke' could be developed in a way which would respect the existing character of Eyke and has constraints in terms of the existing farm buildings whilst site 776 does not. Any planning application for proposed allocation SCLP12.47 (site 776) would be supported by a transport assessment, its position at the entrance to Eyke means fewer transport movements through Eyke and allows for highway improvements. The location next to the school and improved parking are further reasons it is likely to be preferable in highways terms.

Site 777 'Land to the west of The Street, Eyke' remains available and could be allocated as a small site or a reserve site. It achieved fewer 'amber' scores than site 776 in the SHELAA indicating it is the most suitable. Including part of this site would enhance viability of site SCLP12.47. A small strip of land on site 777 could provide for self-build homes required under SCLP12.47, where there is less potential for impact on the AONB.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Comments in relation to sites 280 and 279 are reflected in the proposed allocation of site 776 which provides an opportunity to secure land for future expansion of the school and the car park. It is considered that site 776, although within the AONB, represents a logical extension to the village by extending development on the southern side of the A1152 to the extent of development on the northern side of the A1152, as well as providing benefits in terms of car parking and school expansion.

## Falkenham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Farnham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Felixstowe

Total comments	Support	Object	Observation
1	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

The vast Anzani house by the Port of Felixstowe could be made into flats/apartments and provide many homes and alleviate some of the green belt land which the Council seems intent on building on.

### How these comments have been taken into account in the Final Draft Local Plan:

Anzani House is covered by employment policies promoting employment use in the context of its location within the existing Port of Felixstowe employment area. Permitted development rights under national policy for change of use of offices to residential and the Final Draft local Plan employment policies that relate to supporting marketing guidance provide a policy framework for assessing any redevelopment proposals for Anzani House.

## Foxhall

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Site 765 'Land to the North of Bucklesham Road, Foxhall' is promoted for B use employment (a high quality Business Park/Industrial Park/smaller units for start-up businesses) rather than mixed use. It would provide a logical extension to the existing employment areas and any future development uses on adjoining sites which could come forward in the plan period.

Gladman Developments Ltd comment on the need for the re-consideration of the proposed approach not to allocate any a further strategic site to the East of Ipswich. Concept plan provided for residential development and open space on site 485 'Land North & South of Bucklesham Road' in an Orwell Green Garden Village proposal. The introduction of a positive plan-led approach to allocate Orwell Green Garden Village through this Local Plan would act to set the parameters to enable the timely and sustained delivery of the proposals together with accompanying community infrastructure in a manner that will positively contribute to the sustainable growth of Suffolk Coastal District and the wider Ipswich Strategic Planning Area.

### Members of the Public

None received

#### How these comments have been taken into account in the Final Draft Local Plan:

Site 765 in isolation would potentially constitute piecemeal development, and sites elsewhere are better placed to meet employment needs.

Site 485 alone or together with site 765 would be contrary to the Final Draft Local Plan spatial strategy that focuses new housing and employment land growth provision on the Felixstowe Peninsula and Saxmundham rather than communities surrounding Ipswich. Alternative strategies for the Plan have been assessed, and are set out in the Sustainability Appraisal report.

## Framlingham

Total comments	Support	Object	Observation
3	3	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Cooper Webster, Camilla proposes a masterplanned site encompassing sites previously put forward to the District Council (741, 742, 743, 746, 749) and further land to the east of these sites. It is assumed that housing requirements for Framlingham are based on capacity however this should be clarified. It is considered that the SHELAA shows that Framlingham has significant unutilised housing capacity which can be brought forward at Manor Farm. Part of the site is already allocated for housing in the Framlingham Neighbourhood Plan (FRAM2).

The representation contends that the SHELAA conclusion re site 741, that it is not being within, adjoining or well related to the form of the settlement, is incorrect. Site 741 when combined with parcels 742, 743, 746 and 749 will collectively deliver 400 new homes, community use, employment uses, 300 car parking spaces, and related infrastructure. The proposal for Manor Farm responds to the SHELAA conclusion regarding transport and roads and demonstrates the collective benefits. The representation generally agrees with the estimated housing capacity detailed in the SHELAA. It is stated that all parcels can be delivered in the first five years of the Plan.

It is stated that appropriate access and new road infrastructure will be provided. The majority of the site is not at risk from flooding. Proposals aim to re-establish the landscape structure which has eroded over time. It is stated that a 300 space car park will help alleviate parking pressure on the town centre and support tourism and complement the investment English Heritage have made in the castle area. The site has good walking / cycling access to the town centre which has a range of services and facilities. The site is available, suitable and viable.

Strutt and Parker LLP, on behalf of M Scott Properties, promotes site 261 'Land north of Kings Avenue' for specialist accommodation for those aged 55 and over or with (or supporting someone with) a disability, public open space and a community facility. The SHELAA incorrectly states there is a play area in the south east corner of the site. Other constraints identified can be overcome. Land to the west of the school, site 547 'Land at Dennington Road, North of Thomas Mills High School',

would represent a more suitable area for expansion of the school. It is noted that FRAM 23 has been granted permission without the community centre required by the policy.

**Members of the Public**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The site submitted has been assessed as one site in the SHELAA, reference 1161 'Land at Manor Farm'. It has been assessed as being potentially suitable for development. However, the approach for Framlingham set out in policy SCLP12.1 is for the Neighbourhood Plan to plan for future growth in the latter part of the Plan period. This reflects the scale of recent and current development in the town.

## Friston

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

Friston Parish Council appreciate that comments made to planners concerning Friston seem to have been heard.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Great Bealings

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Great Glemham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received.

## Grundisburgh

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Site 1133 / 560 'Land to the east of Woodbridge Road' (*labelled 560 in representation, but masterplan relates to site 1133*) promote an amended site for allocation. The amended site boundary relates better to the village, adjoining properties and the wider landscape. The proposed scheme is for 20 dwellings including 6 affordable. Dwellings would provide a street frontage to Woodbridge Road. The hedge would need to be removed but an area of replacement is proposed. The site is well related to the east of Grundisburgh, pub, shop and church. Existing public footpath on north east boundary connects highway footpath to centre of the village. Mix of bungalows and 1 ½ and 2 storey dwellings could be provided. The curved edge would have a rural hedge boundary. There are no listed properties that would be affected. The site is not affected by flooding.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan is to contain Grundisburgh's growth from spreading into the sensitive landscape east of the A1079. This is informed by the Landscape Character and Settlement Sensitivity evidence. The Final Draft Local Plan approach is to focus growth of Grundisburgh to the south on a site which has lesser landscape sensitivity and is 'contained' within the settlement, reflecting the consultation responses on the site proposed in the First Draft Local Plan.

## Hacheston

Total comments	Support	Object	Observation
4	2	0	2

### Statutory Consultees

None received

### Parish and Town Councils

Hacheston Parish Council note that no allocations have been made in Hacheston. The Settlement Boundary looks identical to currently, with the exception that site SSP9 which has planning permission is included.

### Other organisations

None received

### Developers/Landowners

Site 652 'Land opposite 2 Low Meadows, The Street' has an extant permission for a field access and also correspondence from Suffolk County Council which suggests that a safe residential access can be achieved. The site should therefore be re-considered for allocation in the Local Plan. The site is well related to the village and development could be accommodated without harm to the character and landscape. The site could accommodate 15 dwellings.

### Members of the Public

Observation:

Site 652 corrections to the SHELAA are proposed:

Access is treacherous i.e. sloping, restricted visibility, narrow road

Utilities capacity – issues with water supply, sewage disposal and surface water disposal

Utilities infrastructure – cables crossing the site are HV power lines and there is an electricity transformer on the eastern side of the site

Transport and road – The B1116 is at its narrowest and traffic speeds. Grit would block drainage and will cause flooding on the B1116.

Open space – further development might be encouraged towards Parham. Development would blight views of the ancient estate claylands west of Hacheston.

Compatibility with neighbouring uses – The level of the site means that any houses would have direct views onto properties in Low Meadows, and there could be flooding to Low Meadows.

**How these comments have been taken into account in the Final Draft Local Plan:**

Upon consideration of site 652 alongside alternative potentially suitable and available SHELAA sites, the site is not allocated in the Final Draft Local Plan based on information in respect of landscape, services, highways and other infrastructure and environmental issues identified. This includes updated information received in consultation comments. Further consideration has been given to the points raised in relation to the SHELAA assessment, and changes have been made where appropriate.

## Hasketon

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Heveningham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Hollesley

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Site 567 'Land East of Rectory Road' is promoted for allocation for development of 10 – 15 dwellings in keeping with the scale and density of the existing settlement. The site is in flood zone 1. Surface water flooding can be mitigated through SuDS and design and layout. The site is not close to any listed buildings. The site is in the AONB but it is clear from past decisions that this does not restrict development. It is very well related to the village. It is critical that a number of smaller sites are allocated to be consistent with the NPPF. It is available and deliverable now and would contribute positively to the five year supply.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Upon consideration of the site alongside alternative potentially suitable and available SHELAA sites, the site is not allocated in the Final Draft Local Plan based on information in respect of landscape, highways and other infrastructure and environmental issues identified.

## Huntingfield

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Iken

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Kelsale cum Carlton

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Hollins Architects, Surveyors and Planning Consultations promote an area in the West of the existing Carlton Park employment site allocation of approximately 1.85ha with an total Gross Internal Area of 7,400SqM. The site is deliverable and immediately available as the site is owned by an existing occupant of the employment site, for whom this expansion to the employment site represents a direct expansion to the existing business. The site is proposed to incorporate a mix of B1, B2, and B8 uses, including flexible starter units for small businesses. This expansion should be taken as an objection to the proposed employment area in the South Saxmundham Garden Neighbourhood.

Spearman, Anne supports site 487 'Land adjacent to Fir Trees, Rosemary Lane' and comments that this should be allocated in the Local Plan. It is stated the two parcels of land that form the site could be considered separately. The site can be accessed from Main Road in Kelsale cum Carlton of through additional land immediately below the site. Supports policy SCLP12.25 (*rep also logged in SCLP12.25*).

### Members of the Public

None received

#### How these comments have been taken into account in the Final Draft Local Plan:

The site put forward at Carlton Park is already within the Employment Area policy (see Policy SCLP12.37)

The Council supports the Neighbourhood Plan as the mechanism for allocating further sites.

## Kesgrave

Total comments	Support	Object	Observation
3	2	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Grainger promote site 520 'Land East of Bell Lane & South of Kesgrave' is promoted for residential allocation. It is envisaged that a small number of commercial and community uses could co-locate here as a natural focus to the site. The site at Bell Lane offers an alternative to large sites at Felixstowe and Saxmundham, or could form an additional allocation, as an option to deliver housing on a sustainable site adjacent to the principal settlement (Ipswich), and this could also form part of a wider allocation as well as the necessity to consider unmet need from Ipswich.

It is commented that the planning application for Bell Lane has concluded that the site is in a location that is highly sustainable, the Inspector at the appeal concluding that the site is in close proximity to Kesgrave Town and its facilities and services, and it would have access to public transport. The Inspector also found that development at the site would be successfully integrated with Kesgrave.

Habitats mitigation in the form of substantial on-site alternative areas of natural green space was agreed to be adequate in order to remove any risk of harm to the protected habitats. Natural England raised no objection as statutory consultee to the planning application.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

A strategic allocation for large scale housing development would be contrary to the Final Draft Local Plan Spatial Strategy that focuses new housing and employment land growth provision on the Felixstowe Peninsula and Saxmundham rather than communities surrounding Ipswich.

## Kettleburgh

Total comments	Support	Object	Observation
2	1	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Hollins on behalf of their client have promoted two sites for development, both east of East Street.

### Members of the Public

Sites 74 'Land adj to Moyses Cottage and north of Lings Field', 198 'Land adj. Churchside, Church Road', and 245 'Land west of Rectory Road', identified in the SHELAA report, should not be allocated for development as they currently fall outside the settlement boundary, and form an important part of the village character.

### How these comments have been taken into account in the Final Draft Local Plan:

Sites 74, 198 and 245 are not selected for allocation. The Final Draft Local Plan allocates one site in Kettleburgh which is site 544 that is more central to the village.

## Kirton

Total comments	Support	Object	Observation
2	1	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Hopkins & Moore comment that site 552 'Land fronting Falkenham Road, Kirton' should be allocated in the Local Plan for the development of approximately 45 dwellings. This would provide an immediately available, suitable and unconstrained location for an appropriate level of sustainable growth in the village. Matters to be addressed included access, utilities infrastructure (an Anglian Water cordon sanitaire covers the north east half of the site and overhead cables run along part of Falkenham Road boundary), biodiversity value (trees and hedges border the site to the east), and highways impacts. It is considered that none of these issues are insurmountable and could be adequately dealt with through the planning application process.

Landbridge for L Kemp & Son comment that site 553 'Land fronting Church Lane' at Kirton would accommodate 4 custom build plots in linear form and should be allocated.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan allocates one site in the village on Bucklesham Road for approximately 12 dwellings to make a modest contribution towards evidenced district housing requirements for the plan period up to 2036. Based on environmental site assessment checks in the SHELAA, site 552 is characterised by environmental constraints which whilst not insurmountable would not indicate it is preferable to the site allocation on Bucklesham Road.

## Knodishall

Total comments	Support	Object	Observation
2	1	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Vision Design & Planning Consultants, acting on behalf of their client, has promoted Land at School Road (new site 1156) for residential development. They state the site does not suffer from any of the reasons given for the decisions by SCDC to not allocate the potential sites identified in Knodishall. The client has expressed flexibility in the area of land allocated and that this should not be dictated by just the land outlined in red in the accompanying plan map.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Following site assessments and considerations relating to progressing the Plan to Final Draft Plan stage, the site is allocated in the Final Draft Local Plan as a change from the First Draft Local Plan for 16 dwellings with the policy addressing water infrastructure.

## Leiston

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

New site promoted at 89 Waterloo Avenue (site 1162). Small sites in sustainable locations like Leiston would contribute to meeting overall housing need.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan strategy for Leiston is to make no further provision for site allocations over and above the made Neighbourhood Plan. The Final Draft Local Plan spatial strategy earmarks a further 100 homes for the market town for future growth later in the Plan period. The Local Plan anticipates that any site allocations required to provide the additional 100 homes will be addressed in a review of the Neighbourhood Plan.

## Letheringham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Levington

Total comments	Support	Object	Observation
2	0	2	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

The landowner comments that the reasons that site 347 'Land north wets of Walk Farm' is not a preferred site are disputed. The site is discounted on the basis that site 706 (Innocence Farm) is more suitable due to:

- i) Scale of the site to accommodate port related activities;
- ii) Scale of the site capable of providing significant landscaping; and
- iii) The site being able to retain the gap between Felixstowe and Ipswich as far as possible.

Reasons that the above 3 points do not justify the Innocence Farm site as preferential over Site 347.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Innocence Farm site is the most suitable available site to meet the needs of Port related employment development , and site 347 is not of a sufficient scale to meet these needs.

## Linstead Parva

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Little Bealings

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Site 430 'Land at Grove Farm, The Street' is promoted for development (amended site boundary). The site is currently vacant and comprises a collection of agricultural buildings which are in a poor state of repair. There is existing access on The Street. The northern part of the site is in flood zone 2 and 3. There is mature woodland to the north and south west of the site. A public right of way crosses the western edge. The site is within a cluster of dwellings. There are a number of services in the village and a business centre to the south. The village covers a larger area than suggested by the settlement boundary. Development is located beyond the settlement boundary in all directions. Permission for B1 was granted in Nov 2008, a recent application for 8 new dwellings was refused however the reasons for refusal can be overcome. The site is available. The site meets the suitability criteria. It is acknowledged that the site is not within or adjoining a settlement, however it is considered that it is well related to the existing settlement pattern. Own SHELAA assessment has been undertaken, and considered that any issues can be addressed. There are no viability issues or abnormal costs.

New site at North West Corner of Finches Hill, The Street, Little Bealings (Site 1159) put forward on the north west corner of Finches Hill, The Street, Little Bealings to be developed for a single property with a new safe entrance from The Street and closing of existing entrance.

### Members of the Public

Small developments should be allowed in Little Bealings. Site 50 'Manor Farm' and Site 430 'Land at Grove Farm, The Street' could be developed with no adverse effect on the village. Site 235 could accommodate a small cottage home.

### How these comments have been taken into account in the Final Draft Local Plan:

Consideration has been given to allocation of the sites suggested. Site 430 is assessed through the SHELAA as being not within, adjoining, adjacent or well related to a settlement. Site 1159 is assessed through the SHELAA as being below the site threshold of 0.2ha to be considered for allocation. As a Small Village, Little Bealings has a Settlement Boundary within which infill and small groups of

dwelling would be supported in principle. Site 235 is understood to not be available and would be below the site size threshold of 0.2ha for consideration for allocation.

## Little Glemham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Marlesford

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Martlesham

Total comments	Support	Object	Observation
5	1	3	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Hopkins Homes comment in relation to site 175 'Land at and surrounding Woodbridge Football club' that pre-application discussions and public consultation events have been held in respect of the redevelopment of the land for approximately 95 dwellings which would involve the relocation of the football club and St Audrys Sports and Social Club to the derelict Notcutts nursery on Yarmouth Road, Ufford and a small enabling development of 12 family homes at the current St Audrys site. Hopkins Homes are still actively pursuing the site and are looking to bring forward a planning application in due course.

Barton Wilmore promote site 533 'Land East of Felixstowe road, Martlesham'. They comment that an allocation of 20 units is substantially below the requirement for Martlesham. The proposals represent an opportunity to create a high quality and sustainable scheme within a generous landscape context in close proximity to the centre of Martlesham village. The illustrative masterplan provides for approximately 275 dwellings, including both open market and affordable units. It is proposed that the development is accessed via two points of access off Felixstowe Road. The site is well related to Martlesham village. Within the Issues and Options representation (October 2017), Landform set out proposals for vehicles, pedestrians and cyclists in more detail. The site is largely free from environmental constraints. Development would be a logical extension to the settlement.

### Members of the Public

Comment submitted on the land bounded by Top Street, Ipswich Road, Sandy Lane and Duke's Park, Martlesham (site 452). It appears that part of this land is designated as urban which is contrary to the judgement of the planning inspector. The land should be designated as countryside.

The following comments relate to the land bounded by Top Street, Ipswich Road, Sandy Lane and Duke's Park, Martlesham. A planning application for the development of this land (DC/15/4788/OUT) was rejected by the Council. The applicants decided to appeal against the

Council's decision not to grant planning consent (APP/J3530/W/16/3151175). In rejecting the appeal the planning inspector concluded that the site should not be considered as urban.

**How these comments have been taken into account in the Final Draft Local Plan:**

Land at Woodbridge Town Football Club is allocated for housing for approximately 120 dwellings associated with relocation of the football club. Development will only be supported as part of a proposal which would establish replacement facilities for the football club which provide equivalent or better provision of football club facilities within a location which is accessible to the community by non-car modes of transport.

Site 533 has not been identified as an allocation and the Council considers that a review of the Neighbourhood Plan could consider such proposals.

The Land at Top Street has been made available by the landowner for consideration for development in the Council's SHELAA. It has been appraised alongside other alternative sites and has not been allocated for development. The SHELAA identifies it as unsuitable.

## Martlesham Heath

Total comments	Support	Object	Observation
3	0	2	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Suffolk Constabulary promote site 999 'the Suffolk Police Headquarters'. They intend to vacate the site during the plan period, and relocate to other premises. It is requested that the site is allocated for up to 250 dwellings.

They state that the assessment of the site against the suitability criteria in the SHELAA demonstrate that the proposed development would mostly score 'green', with 'amber' scores for utilities infrastructure, contamination, biodiversity and historic environment. It is noted that there are no 'red' scores for the site. It is stated that the high voltage cable can be avoided within the layout of the proposed development. The contamination, biodiversity and historic environment issues would be addressed through mitigation measures implemented as part of the proposed development.

It is commented that the site is in an appropriate location for development in transport terms, in that it is well-related to existing walking and cycling routes and it is accessible by public transport. The proposed development would provide facilities for pedestrians and cyclists that would connect to the existing network. A Transport Assessment has been prepared which demonstrates that the impacts on the transport and highway network would not be severe.

### Members of the Public

Concerns are raised over Site 221 'Gibraltar Farm, Private Road' and Site 940 'Shawfields and Little Shaws, Shaw Valley Road'. Clarification is sought as to the current status of these applications. Concern is raised over the vast Local Plan First Draft, issued as a 'consultation' document online.

### How these comments have been taken into account in the Final Draft Local Plan:

Site 999 Land at Suffolk Police Headquarters, Portal Avenue is allocated for development of approximately 300 dwellings, having reviewed the sites available for development in the context of the revised housing number for the District and the consultation responses which show support for brownfield development.

Sites 221 and 940 have been assessed in the supporting SHELAA as unsuitable for consideration for allocation in the Final Draft Local Plan.

## Melton

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Christchurch comment that site 645 'land at Yarmouth Road opposite Ufford Park Golf Course' could provide for a development including residential units, assisted living units and a care home, together with associated works to the site access. The development would also incorporate modifications to the pedestrian network with a new pedestrian crossing on Yarmouth Road. Opportunities for non car based travel to and from the site, by bus, train, bicycle or on foot has been considered. The surrounding area of the Site is served by public transport with a regular frequency of buses servicing the locality. Pedestrian improvements are proposed. It is accessible to the station. A Flood Risk has been carried out. All necessary measures will be undertaken to better understand and record any archaeological remains at the site which may be of interest. There are no other historical or conservation designations in the immediate vicinity and therefore no historical or conservation constraints to the allocation of the site.

Flowergrange Ltd comment that site 408 'land to the North of Woods Lane, Melton' should be allocated. The SHELAA assessment of the site considered it as being available, achievable and suitable subject to the clarification of access to the site, utilities, infrastructure and flood Risk. These issues are considered capable of being addressed. A well designed scheme could integrate with the Bloor Homes site.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Local Plan strategy is to disperse growth to other settlements in the Final Draft Local Plan. Melton has a neighbourhood plan (made in 2018) which makes provision housing and employment allocations. The site opposite Ufford Park Golf course is characterised by settlement coalescence issues. The Local Plan sets out an approach whereby any additional development in Melton would

be identified through the Neighbourhood Plan.

## Middleton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Monewden

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received to address.

## Nacton

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

It is not considered that site 1096 'Land by the A14, west of Bluebird Lodge' is isolated. It is close to the A14. Felixstowe, Colchester and all parts of Ipswich are less than a 30 minute commute. There is scope to retain the boundary trees as part of a landscaping scheme. The site is not in an Air Quality Management Zone (AQMA) and as such is potentially suitable for small-scale residential use. The site should be removed from the AONB.

### How these comments have been taken into account in the Final Draft Local Plan:

The site is not consistent with the Final Draft Local Plan approach of allocating sites which are within, adjoining or immediately adjacent the built up area of settlements. It is beyond the scope of the Council's Local Plan process to amend the boundary of the AONB. The site is identified as unavailable in the Strategic Housing and Employment Land Availability Assessment.

## Newbourne

Total comments	Support	Object	Observation
2	1	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Notcutts Limited respond in support and comment in relation to site 285 'Land rear of The Old Piggery, Mill Road' that almost the entire site is covered in glasshouses, which have become surplus to the company's requirements. The site is ideally located for either residential or small scale employment development, or both. The site is centrally located within the settlement of Newbourne, it is accessible to bus services, which are positioned directly at the site's access/egress onto Mill Road. Notcutts would like the Council to give due consideration to the site being allocated for an employment, housing or mix of land uses in the Local Plan.

### Members of the Public

Objection on the basis that site 1116 is not large enough to provide a mix of open market and affordable housing, the latter being what the village needs above all. The site is at risk of flooding. The site is outside the 'Village Envelope' that was determined in 1985. There would be an adverse effect the setting of an important Listed Building. It would result in traffic increases. It is greenfield.

### How these comments have been taken into account in the Final Draft Local Plan:

Newbourne is a unique and particularly distinctive settlement in the District. The Final Draft Local Plan strategy does not identify housing allocations in Newbourne. The glasshouses and their situation related to other buildings comprise a key element of the built character of the village.

## Orford

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

Ettwein Bridges Architects support the removal of sites 40, 410, 540 and 638 as they are all outside of the Settlement Boundary, in the flood zone and at a well-defined edge on Daphne Road. It is an important part of the village's character.

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan is consistent with the comments received which are noted.

## Otley

Total comments	Support	Object	Observation
14	4	7	3

### Statutory Consultees

None received

### Parish and Town Councils

Otley Parish Council comment that they have considered the proposed allocations, the sites in the SHELAA and alternative sites. An alternative site is put forward – ‘land north west of Chapel Road’ (site 1163). The site is 2.58ha and has a capacity of 40 houses. The site is the first choice identified through consultation with residents. The site is close to services and provides development without extending the footprint of the village. The site could provide a maximum of 12 houses in the settlement boundary and 28 houses outside of the settlement boundary. Further order of preference from our consultation is site 98 ‘Land north of the Depot, Church Road’, site 1051 ‘Land at Wood Farm, Helmingham Road’ and site 1001 ‘Land north of Otley House, Helmingham Road’ consecutively.

The Parish Council recommend that development policy setting for our suggested alternative site will be expected to accord with the following criteria:

- Provision of housing suitable for low cost starter homes.
- Provision of suitable housing to meet the needs of older people i.e. bungalows.
- Provision for dwellings to meet the requirements to be accessible and adaptable.
- Provision of semi-detached housing that is no less than 30% of the development.
- Provision of 2 or 3 bedroom housing opposed to larger houses.
- Provision of a comprehensive landscaping scheme for the site which provides for the retention of trees and hedgerows along the east and west boundaries.
- Provision to provide a contribution towards improvement of current open space and recreational and community facilities within the village under policy SCLP8.2
- Provision of traffic calming measures within the village.
- Developers will need to demonstrate there is adequate infrastructure of drainage, water supply network, electricity supply, high speed broadband or that it can be made available under policy SCLP 3.6
- The design and layout of houses to be sympathetic to current design of housing in the village.
- Provision of adequate off road parking and gardens for each property

### Other organisations

None received

### Developers/Landowners

Site 465 'Land Bounded by Helmingham Road & Ipswich Road' and site 764 'Land at Chapel Road' proposed for allocation are not any better related to the form of the settlement than site 457.

Site 457 'Land South of Church Farm House, Church Road' should be allocated for the following reasons: Would be inconspicuous as trees / hedgerows would remain; has an existing access; is close to village amenities; the settlement boundary could be extended to include the site; development would not obscure the view of the Church of St Mary; the number of units could be reduced to 6 to represent a sympathetic infill; the site has been unused for years and has no agricultural value; similar development have taken place in Grundisburgh, Westerfield, Witesham and Tuddenham; and the site has sewerage, electric, water and telecoms services.

Site 1001 'Land north of Otley House, Helmingham Road' is not woodland but is a derelict orchard. There have been issues of bonfires, illegal dumping and ragwort on the site. The trees are becoming a hazard to the highway. The amended site is a similar size to site 465. Site 465 is agricultural use. The site is central village amenities and there is a footpath to from the southern corner of Otley House to the school, village hall and surgery. The site would make a significant contribution to the growth and sustainability of Otley.

Site 1051 'Land at Wood Farm, Helmingham Road' is currently used as a nursery and is to the north of the main dwelling at Wood Farm. The Otley residents questionnaire identifies reasons against development of the site as it not being well related to the settlement and not having a footpath. The reasons identified for the site being considered are that a footpath could be included as part of development and would make this part of Otley safer, it is closer to the centre than site 764, a planning application would be for affordable housing, the type of housing would be 2 and 3 bedroom, materials would be chosen by Otley residents, the site was 3<sup>rd</sup> out of 8 sites, the 1<sup>st</sup> site has a covenant that would prevent most of it from being developed, it is effectively infill, development wouldn't extend beyond the site, part of the former wood would be restored. The best sites should not be those that are closest to the village envelope.

Landowners put forward site 1163 'Land north west of Chapel Road'. It is 2.58ha and is part brownfield and part greenfield. The brownfield section is used to park coaches and was formerly a garage. There is a bungalow and a few buildings to the rear of the site. The green field section is currently used for grazing horses. A footpath bisects the two parcels. The site is in a more central location to the proposed allocations. It is close to services. Residents would be able to walk rather than drive. It would include first and last time buyer properties, affordable housing and bungalows. CIL contributions could go towards rebuilding the village hall. It is not overlooked by many properties.

### **Members of the Public**

Site 772 would turn Otley into a village similar to Grundisburgh

Site 771 is a perfect site for development. Close to services.

New site 1163 is centrally located and inside the settlement boundary. It has capacity for 45 - 55 units. It involves brownfield regeneration. There is scope to incorporate an extension to Otley primary school playing fields which is necessary to accommodate the proposed increase in roll. The utilities companies have indicated that the quantum of development considered is acceptable in this location. Views into and out of the site are limited by existing development. The agricultural land is

not open in nature. Its development would improve the townscape. There are no biodiversity issues identified. The site is separate from Grade II listed Otley House by Bowerfield House.

Site 98 would blend in with Hubbards site, infrastructure is in place, good site for 8 houses.

Site 1001 has bad visibility, road safety issues. The lane is used for horse riding, walking, jogging, biking and walkers with prams. The site is outside of the current Settlement Boundary. It is not well related to services in the village, beyond the reach of the elderly or frail. The pavement only goes as far as Bowerfield House. The provision of a pavement would urbanise this part of Otley. A substantial length of hedgerow is likely to be lost to achieve access. A visibility splay would cause serious harm to the access.

At site 1051 the road is narrow. The lane is used for horse riding, walking, jogging, biking and walkers with prams.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The two residential site allocations in the First Draft Local Plan are not taken forward in the Final Draft Local Plan, and an alternative site is instead proposed for allocation (part of site 771), reflecting consultation comments which would favour a site allocation close to the centre of the village.

Site 1163 has been assessed as potentially suitable in the Strategic Housing and Employment Land Availability Assessment, however it is considered that the benefits associated with allocating in the centre of the village can be achieved through the allocation of site 771 which demonstrates lesser potential impacts in relation to heritage assets. Part of site 1163 is within the Settlement Boundary where the principle of development would be supported by policies subject to other planning considerations.

Site 457 has been re-considered however the conclusion in terms of the site not being within, adjoining or well related to the settlement remains appropriate due to its locations away from the main built up part of the settlement.

Site 1001 is considered to present issues similar to those raised through the consultation in relation to site 465, and therefore is not considered appropriate for allocation.

Site 1051 has been re-considered however the conclusion in terms of the site not being within, adjoining or well related to the settlement remains appropriate due to its locations away from the main built up part of the settlement.

Site 772 is not put forward for allocation, however in terms of the SHELAA criteria remains a potentially suitable site.

Site 98 is a potentially suitable site in the SHELAA, but it is considered to not be as centrally located as site 771, part of which is proposed for allocation to address comments raised through the consultation.

## Parham

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Peasenhall

Total comments	Support	Object	Observation
4	0	3	1

### Statutory Consultees

None received

### Parish and Town Councils

Peasenhall Parish Council consider the 'small village' that the village has been identified as is too restrictive in enabling suitable growth. In this regard, the Parish Council are open to suitable residential development and would welcome the reassessment of potential sites in order to identify allocation within the village.

Sibton Parish Council object to any part of site 1042 included within the Peasenhall settlement boundary for the following reasons; flood risk of the site, poor drainage, and poor access.

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

A member of the public commented that the address of site 1042 should be 'adjacent to Farthings' or 'opposite Sibton Abbey Manor, Sibton Road'. The comment also states the site is currently used as agricultural land. The Parish Council objected to development of the site, and noted the view is held by a large proportion of residents. Another comment detailed a desire for the potential sites identified through the SHELAA process to not be allocated within the Plan. The commenter also referred to poor infrastructure, namely drainage and sewerage capacity and uncertainty surrounding funding for the primary school, as reasons to support the status of sites in the village to remain unallocated.

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan provides for some housing growth at Peasenhall by introducing a site allocation on part of site 1042 at land adjacent to Farthings, Sibton Road. The site allocation makes provision for affordable and market homes, landscaping in relation to the rural parkland setting and Sibton Abbey, pedestrian access and connectivity. The policy also requires a site flood risk assessment and evidence to demonstrate adequate water / sewerage infrastructure provision.

The name of site 1042 has been amended to Land adjacent to The Farthings, Sibton Road.

## Pettistree

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Playford & Rushmere St Andrew

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Kesgrave Covenant promote a concept masterplan provided showing the extent of a potential deliverable alternative housing site on land north of Humber Doucy Lane that could realise highways, green infrastructure and pedestrian connectivity improvements, at site 1083 'Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew' (formerly 1083 and 1082). The site extends between the junction of Seven Cottages Lane and Tuddenham Road and the Woodbridge – Ipswich railway line near Westerfield. It is envisaged that development could come forward towards the end of the five year period or during the 5 to 10 year period. It is anticipated that it would take around 5 years to complete. Consideration given to landscape impact, avoidance of blight of future Ipswich Northern Relief Road and the setting of the listed water tower.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Having regard to ongoing engagement and working with neighbouring Ipswich Borough the Final Draft Local Plan reflects that the area subject to the Kesgrave Covenant representation is bisected by the Local Authority boundary. The Final Draft Local Plan introduces an allocation on some of the promoted land that lies on the Suffolk Coastal side of the boundary. This allocation is policy SCLP12.24 for 9.9ha of land to the east of Humber Doucy Lane to come forward for the development of approximately 150 dwellings post 2031.

## Purdis Farm

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

An alternative site of the container terminal & warehousing to Land at Innocence Farm would be at the existing Orwell Crossing Lorry Park just off the A14 & close to the Felixstowe to Ipswich railway line. This site would have a reduced environmental impact as there are no housing developments close to the Orwell Crossing Lorry Park.

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan evidence base includes a Port of Felixstowe Growth and Development Needs Study which appraises various sites including the site suggested. It identifies that the most suitable site to meet Port related economic growth is the site closest to the Port at Innocence Farm. The identified site at Innocence Farm provides the opportunity to meet the long term needs as well as ensuring strategic landscaping and buffering to mitigate the impacts of the uses anticipated. Land at Innocence Farm is also in a suitable location due to proximity to the Port of Felixstowe and the A14 and appropriate access arrangements can be achieved which will reduce the impacts on the local road network.

## Rendlesham

Total comments	Support	Object	Observation
4	4	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Site 557 'The Mews Rendlesham and Additional Land' should be allocated for convenience store, retail and business uses. The SHELAA does not identify any issues in relation to neighbouring uses, market attractiveness, contribution to regeneration, landscape, coastal change and utilities capacity. All other issues would be considered as part of a planning application to ensure the details are acceptable. A walkway would be included to connect to the existing settlement at Tower Field Road. It is not clear why the other sites were deemed to be more suitable as their focus is housing not employment/retail. There is no retail provision in the allocated sites. It scores positively in the SA in terms of supporting prosperity and the vitality and viability of Rendlesham District Centre and supporting jobs. The Employment Land Supply Assessment (site ref 52) confirms the site is suitable for other uses. Promotes the road frontage part of the site which is not affected by issues including contamination, surface water flooding, biodiversity and grade II Listed Building. The site is suitable, available and deliverable. A masterplan is currently being produced, and community / Parish Council engagement is proposed.

Regarding Site 451 'Land to the North and East of Redwald Road Rendlesham' it is stated that the A1152 is a clearly defined south eastern boundary to the settlement. The northern boundary is defined by an unnamed road/track and the B1069 to the south eastern boundary and Redwald Road / residential properties on the south western boundary. A single access is proposed with walking and cycling access. Surface water runoff can be actively and sustainably managed and a variety of SuDS used. Surface water drainage system would be designed to take account of the impacts of climate change. There are therefore no drainage or flood risk constraints that would prevent the site being developed. All necessary measures would be undertaken to better understand and record archaeological assets. There are no direct impacts on nearby heritage assets. This is demonstrated through application DC/17/5390/OUT.

Site 699 'Bentwaters Park, Rendlesham' should be assessed and allocated for holiday lets. Housing is not proposed on the site.

The Trustees of Bunbury comment on site 506 'Land to the rear of 3 - 33 Suffolk Drive' and state that the site should be allocated as an alternative to one or two of the existing allocations. The plan acknowledges that Rendlesham has capacity for more than 100 dwellings. A transport appraisal demonstrates that access to the site can be achieved. It would be possible to connect to utilities. The site is entirely in Flood Zone 1. A Heritage Statement would be submitted with an planning application. The potential for archaeology should not be the sole factor in considering the appropriateness of the site. A Transport Assessment and Travel Plan would be produced as part of any future planning application. Some of the proposed allocations have more overriding constraints such as the proximity to the Rendlesham Water Recycling Centre.

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

Paragraph 12.658 of the Final Draft Local Plan states that in the longer term, the village may have capacity to accommodate more than the 100 homes proposed, but is limited predominantly by highway factors and the cumulative impact of both residential and employment traffic on the local highway network, and also by education capacity. Higher levels of growth are likely to trigger the need for new education and early years provision. The internal road layout within the village (a consequence of its original function as an airbase) means access from the village to the external road network is limited. Additional sites are not therefore considered for allocation in this Local Plan.

## Rushmere St Andrew

Total comments	Support	Object	Observation
4	3	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Boyer Planning for Ipswich Town Football Club (ITFC) comment on sites 1060 'Land at Ipswich Town Football Club training ground, Playford Road' and 953 'Land between Playford Road and Bent Lane, opposite sports fields'. Options to realise housing development, new and improved sports, community, health and education facilities either side of Playford Road are presented with a concept masterplan. The main part of the site, to the west of Playford Road, consists of the existing Training Centre and Academy Buildings, along with 8 pitches, and further formal and informal open spaces. Joint development opportunities between University (UOS) of Suffolk and ITFC have been limited to-date due to the physical location and separation of facilities of UOS based at the Waterfront in Ipswich, and the ITFC Training Ground at Rushmere St. Andrew. Land currently underutilised at the training ground has been identified and tested to see if it would be possible to accommodate and create a specialist research unit that would enhance and strengthen the of the ITFC Academy as part of the improvement to the UOS degree programmes. This opportunity would be unique to this region. Propose the following use in redeveloped premises: indoor gym sports, physiotherapy & medical, physiology laboratory, wellness areas, lecture room and sports management.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Site 953 is identified as being potentially suitable in the Strategic Housing and Employment Land Availability Assessment, subject to there not being a need for the sports facilities / open space on the site. However it is not considered appropriate to allocate the site as it would result in the open space.

## Saxmundham

Total comments	Support	Object	Observation
7	7	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Saxmundham Town Council recommend an alternative split site approach whereby the master planned proposal is contained south of Saxmundham (between the A12 and railway line) and east of the town (up Church Hill). It is considered this would present the most sustainable site allocation.

### Other organisations

None received

### Developers/Landowners

Pigeon Capital Management Ltd promote land to the west of the A12 (Site 716 'Land south of Saxmundham') for employment uses, and made reference to the delivery of a Suffolk Energy Gateway Employment Park which would capitalise on the future job growth in this market sector. For this reason, is stated Site 716 should be included in Policy SCLP12.26.

Site 435 'Land north and east of The Manor House, Church Hill ' (amended to include land to the North of 13.5ha, and therefore totalling 21.9ha) is promoted as an alternative for residential development, open space, and associated infrastructure, together with the potential for a 210 place primary school with early years provision. According to transport studies undertaken by AECOM, for Bidwells and the landowners, it is demonstrated that the B1119 Church Street/High Street/B1121 South Entrance/Chantry Road Junction can accommodate 479 dwellings and a new 210 place primary school. The representation states development of the site is considered viable with no constraints on the ability of the site to deliver policy compliant affordable housing and CIL contributions.

The landowner promotes site 559 'Land at The Manor House, Church Hill' for residential development and objects to development of the South Saxmundham Garden Neighbourhood.

### Members of the Public

Support for development east of Saxmundham, along the B1119. It is considered development on this side of the town would be more beneficial than development to the South of the town.

Site 435 is promoted as an alternative master planned site as it is considered the proposed allocation would lead to significant adverse impacts on the nearby heritage assets. These being; Hurts Hall, St John's Church, Saxmundham Conservation Area, and other nearby listed buildings. The Heritage Report concludes that site 435 would have minor and very minor impacts on nearby heritage assets.

**How these comments have been taken into account in the Final Draft Local Plan:**

The amended site 435 (along with site 559) has been re-assessed through the SHELAA and Sustainability Appraisal, however it is not of a scale that would enable the delivery of the scale of the proposed Garden Neighbourhood in a comprehensive manner. Beyond the tree line, development would be particularly sensitive in landscape terms, reflecting the conclusions of the Landscape Sensitivity Assessment.

Site 716 has been included within policy SCLP12.29 as part of the re-drafting of the policy and indicative masterplan, within which the school, community uses and 800 dwellings are located between the A12 and the railway line.

A split site approach has been considered through the consideration of alternative sites, however it was considered for reasons relating to landscape impact and transport impact that the approach to allocate land to the south is preferable.

## Saxtead

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Shottisham

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

The Bawdsey Estate promote alternatives to the site identified in the First Draft Local Plan (Policy SCLP12.59), all of which have been assessed through the SHELAA process. The sites in question are site 20 'Land adjacent to 1-6 The Street, Shottisham' and site 901 'Land East of Heath Drive, Shottisham'. Regarding site 20 it is considered suitable, achievable and available for residential development and located in a sustainable location. Residential development of 8 dwellings on Site 20 would; achieve a logical extension to the western extent of the village, deliver careful design in the context of Shottisham Conservation Area and the AONB, support the community of Shottisham. Site 901 is considered suitable, achievable and deliverable and residential development of 8 dwellings would; provide a logical extension to the eastern extent of Shottisham, and sit well in the existing residential streetscene.

### Members of the Public

The Council own a larger plot of land in the Heath Drive area which would be more suitable than site SCLP12.59, however would not benefit the pub or provide a car park.

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan maintains the allocation of land opposite the Sorrel Horse Public House, as an allocation being carried forward from the adopted Site Allocations and Area Specific Policies DPD. Some amendments have been made to the policy to reflect the comments received. Whilst sites 20 and 901 are identified as potentially suitable in the Strategic Housing and Employment Land Availability Assessment, the Local Plan does not look to allocated any further sites in Shottisham as it is identified as a countryside settlement.

## Sibton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Sizewell

Total comments	Support	Object	Observation
1	0	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

The Nuclear Decommissioning Authority and Magnox have promoted Site 545 as an employment site to support the decommissioning and remediation of Sizewell A. Accordingly, the site is available for works and uses associated with nuclear decommissioning and site remediation; management of waste in line with national strategies, and ancillary and new operations and uses, which may include B1, B2 and B8 uses, or uses associated with energy generation. GVA consider a site-specific policy is needed in order to meet these objectives. The current policy defines the site as in the countryside and hence gives limited potential for redevelopment of brownfield land and proposals that support the decommissioning of the site. GVA suggest the inclusion of a site specific policy and quote the following:

*“The policy should support;*

- *Works and uses associated with nuclear decommissioning and site remediation,*
- *Management of waste in line with national strategies.*

*The policy could also support:*

*Ancillary and new operations and uses including:*

- *Use Classes B1, B2 and B8,*
- *Uses associated with energy generation, energy storage or a variety of other uses in line with government energy policy.”*

### Members of the Public

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

Allocation of site 545 would not relate meeting the evidenced employment needs and it is considered more appropriate that it would be considered in relation to policies relating to employment uses and Sizewell in the Plan.

## Snape

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Stratton Hall

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received to address.

## Sudbourne

Total comments	Support	Object	Observation
0	0	0	0

### **Statutory Consultees**

None received

### **Parish and Town Councils**

None received

### **Other organisations**

None received

### **Developers/Landowners**

None received

### **Members of the Public**

None received

### **How these comments have been taken into account in the Final Draft Local Plan:**

No comments received to address.

## Sutton

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Sweffling

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Theberton & Eastbridge

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Thorpeness

Total comments	Support	Object	Observation
3	1	2	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Thorpeness and Aldeburgh Hotels Ltd promote site 981 'Land off Aldringham Road, Aldringham cum Thorpe' for a mixed use development incorporating 65 dwellings (including affordable) and a sports offering, as part of the golf club and country club. They have also engaged with Aldringham cum Thorpe regarding their Neighbourhood Plan.

### Members of the Public

A member of the public has commented their desire to see site 957 remain a 'not potential' site even if the primary reason for it being a 'not potential' site is that the availability was not certain. It is stated that the number of comments to the Issues and Options Consultation stating their displeasure at the suitability of the site should result in the site being designated a 'not potential' site, if the site becomes available.

### How these comments have been taken into account in the Final Draft Local Plan:

The site is assessed in the Strategic Housing and Employment Land Availability Assessment but is not allocated for development because the emerging neighbourhood plan is best placed to address the particularly sensitive historic and natural and environmental and tourism context and the evolution of the unique settlement.

## Trimley St Martin

Total comments	Support	Object	Observation
3	2	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Scott Properties promote promote 'Land north of healthfields' (site ref 372) for older persons housing and specialist homes for persons with a disability. Windfall sites outside of the settlement boundary but that relate well to the existing settlement are better suited to deliver such niche housing that responds to a demonstrated localised demographic need. The land to the north of Heathfields, Trimley St Martin, is capable of wholly delivering specialist housing.

Turley for Pigeon Capital Management comment Land at High Road (SHELAA site 651) and state that archaeology, surface water, biodiversity and access issues are identified and addressed.

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan strategy for the Trimley villages is focus on a small number of larger sites to deliver a broad mix of housing and supporting infrastructure. Sites allocated in the Final Draft Local Plan perform more strongly than the site at Heathfields when assessed against criteria in the SHELAA, and the allocation is focused around delivery if a new primary school.

## Trimley St Mary

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Tuddenham St Martin

Total comments	Support	Object	Observation
34	34	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

Site 1154 'Land at Main Road and The Street' is a new site put forward by a third party. The land is within a 30mph zone. The site would create more attractive growth for the village as it is between existing dwellings. Access would be directly from Main Road and could provide an opportunity to introduce traffic calming. The site could incorporate a safe, floodlit areas for parking / visitor parking. The children's play area, village green and playing field could be relocated to the site which is in a more central position. The site could provide new and easy access to the village hall. It could be of interest to a social housing provider due to benefits of enhancing village life. Site may accommodate around 12-15 small houses with the other uses on site.

Site 216 'Land adjacent to Hilltop, Westerfield Lane' could also be included. Site SCLP12.63 is inappropriate in scale for the village and would create a dangerous access.

A large number of respondents submit support for new site 1154 to be allocated in place of site SCLP12.63 and agree with comments made under the submission of the site.

Concern raised over scale of new site 1154 put forward and it is considered that if the highway issues on Keightley Way could be addressed then this site would be preferred. Access to 1154 would be better than SCLP12.63 during construction but not in the longer term. A development of only 12-15 houses would not be deliverable considering the other facilities proposed. It should remain as farmland.

Small piece of land at the front of the property known as Fynn Valley Farm would be supported, along with small developments at Hilltop (site 216) and Keightley Way (site 135).

Site 1155 'Land South of Main Road, adj. Fynn Valley Farm' is promoted as alternative. Understand that a couple of villagers may have put forward my site of Main Road, (as highlighted on the map attached), as more acceptable, more in keeping with the village environment and suitable for homes, including small bungalows, than the site at Keightley Way. It can be considered and should help the Council to move forward in a more acceptable manner.

Support for the inclusion of site 1155, as a more modest site than 1154. Together with a small number of dwellings at Keightley Way and Hilltop (216) would provide 25-30 dwellings.

1164 put forward in place of 1154 and SCLP12.63 which are considered to be too large. Along with site 1155 the sites could provide 7 or 8 small dwellings for downsizing. This would be more in keeping with the village. From the site there is a large verge for pedestrians to walk to the bridlepath and on to the church and pub (the two main facilities in the village) and also a path which runs alongside Ellerburn to the village hall. The footpath has been used for at least 10 years and it maybe timely to make it an official footpath.

#### **How these comments have been taken into account in the Final Draft Local Plan:**

The site allocation at is maintained in the Final Draft Local Plan. Having regard to criteria in the SHELAA upon which alternative sites are assessed, the site allocation is considered to be more suitable for allocation to contribute towards District housing requirements particularly in relation to highways and environmental issues.

## Tunstall

Total comments	Support	Object	Observation
3	2	1	0

### Statutory Consultees

*None received*

### Parish and Town Councils

*None received*

### Other organisations

*None received*

### Developers/Landowners

Site 415 'Land opposite Hall Garden Cottage' is available in the short term or could be phased. It could meet local needs such as affordable housing, starter homes or bungalows. The site would suit low density development of 20 dwellings, similar to Tunstall Green. If considered with adjacent sites (54 and 214) it would be better related to the Settlement Boundary than other sites in Tunstall, and would have two accesses and could provide other community benefits. Discussions have taken place with the owners of these sites. Other sites may also have ownership issues. Table 3.4 identifies 'small villages' as acceptable for new housing allocations and small groups of new housing within Settlement Boundaries. Development in Tunstall is also supported by the NPPF in terms of locating housing development where it will maintain the vitality of rural communities. The site is outside of the AONB. The footpath on the northern edge of the site would be unaffected. Tunstall is a small village and is linked to the nearby large villages of Rendlesham and Snape, and Woodbridge, Aldeburgh and Ipswich. The site does not have any known planning or environmental constraints. Site 214 is no longer allotments (as reflected in the draft SHELAA). The site is vacant. It could reduce the need for sites in other settlements.

Site 727 'South of Snape Maltings' and 728 'Land to the east of Snape Maltings' are promoted for a car parking allocation, including 1.2ha for daily use and 3.5ha for overspill parking. It has been used for over ten years as a temporary parking area. It will facilitate aspirations for Snape Maltings and provide general parking for visitors and residents to access nearby public footpaths. The car parks would accommodate parking relocated from removing parking on the lawns on the main site, parking relocated due to planned redevelopment of vacant buildings, to accommodate parking relocated from the west of the site which has poor vehicle access, to accommodate parking during special events and to improve traffic circulation. The parking areas are already used by other visitors such as walkers. It is anticipated there would not be any adverse impact on the local highway network from site 727. A transport assessment would be submitted as part of a planning application. The regeneration of the site can only be achieved if supported by a car parking solution. The

Council's previous pre-application response suggested the most appropriate location for parking would be on land to the south of Snape Maltings.

The landowner promotes an extended site 108 'Land adjacent to The Red House, Orford Road' encompassing 2.53ha for residential, retail and commercial development. It is commented that the site is relatively featureless contributing to its unconstrained nature and enabling the delivery of a well designed development. An appropriate mix of housing, including provision for older people in the form of specialist housing and bungalows owing to the ageing population of the rural areas of the district, could be accommodated in this central location within Tunstall. The central location also lends itself to the prospect of a community related aspect to a proposed scheme. It is also stated development could accommodate a retail or commercial unit and suggested is a local convenience store, surgery, or small business, which would support rural employment opportunities and the sustainability of the rural community of Tunstall.

### **Members of the Public**

None received

#### **How these comments have been taken into account in the Final Draft Local Plan:**

Whilst sites 415 and 108 are considered to be a potentially suitable site through the SHELAA assessment, the strategy of this Local Plan does not focus upon the Deben peninsula and therefore it is concluded that alternative sites elsewhere are preferred.

In relation to sites 727 and 728, policies SCLP6.1 and SCLP6.2 would provide the basis for consideration of car park proposals at Snape Maltings.

## Ubbeston

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Ufford

Total comments	Support	Object	Observation
3	2	1	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Notcutts Limited support site numbers 908 and 909. Notcutts Limited promote land at Vale Farm, east of A12, and between the A12 and Yarmouth Road, Ufford for mixed use development, incorporating; housing, commercial, landscaped grounds, and football pitches. In putting forward the proposed site it is stated that the Local Plan must have regard to all reasonable alternatives. Specific reference is made of the good location for commercial development adjacent to a strategic highway network. Residential development is more suited to the land bounding the existing built area of Ufford in the north east. The representation aims to provide a solution to the unsuitable status provided to the two sites in the Draft SHELAA, stating the commercial aspects could be easily accessed via the A12 and the housing aspect accessed via the main road to the east and a large area is made available for the provision of football pitches and landscaped grounds. The comments conclude in reference to the unconstrained nature of the site, void of special landscape designations, heritage assets, and flooding risks.

Notcutts Limited promote site 177 'land at the Former Nursery, Yarmouth Road, Ufford' for mixed use development, incorporating housing and employment uses. The site can be accessed via Yarmouth Road to the east, the opposite of which is existing employment development. Any employment allocation in this location would have easy access to the A12. It is considered the site is unconstrained in regard to flood risk, heritage impact, and void of special landscape designations. Furthermore, it is claimed the site has good access via foot and public transport. Notcutts Limited would like the Council to give further consideration to the site being allocated for either employment uses, housing or both.

Artisan PPS Ltd object to the omission of site 561 'Crown Nursery ' for the delivery of a mixed use scheme including employment and housing, as well as specialist needs housing. As an existing employment area and of limited current redevelopment, it is considered the District Council fails to recognise both the existing land use position and the opportunity for sustainable mixed development.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Final Draft Local Plan has not allocated sites in Ufford to reflect the spread out nature of the settlement, significant recent growth, potential issues of settlement coalescence and the assessment of individual site characteristics against criteria when compared to sites in other settlements. Sites in Ufford promoted for employment uses are not considered to be as well suited to a broad range and scale of B1, B2 and B8 employment land requirements as there are alternative sites allocated for employment elsewhere on the A Road network in the District.

## Waldringfield

Total comments	Support	Object	Observation
1	1	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

Waldringfield Golf and Leisure, on site 509 'Waldringfield Golf Club, Newbourne Road' provide information on the environmental, social and economic opportunities and constraints to the development of land at Waldringfield Golf Course. It is commented that the site has the propensity to make a meaningful contribution towards assisting the Council in accommodating their housing needs and in helping them grow the District's tourism and leisure offer. Heritage Developments has raised considerable concern of the wording of the Council's draft tourism accommodation policies which are considered overtly prescriptive. This level of prescription is neither justified nor positively prepared and is considered unsound. Alternative policy wording is offered in response. Lanpro has carried out its own assessment of the sustainability of the proposed allocation using the Council's own sustainability criteria which demonstrates that the areas proposed for redevelopment are entirely appropriate and sustainable for their proposed uses. The allocation of the site for a mix of uses, together with the retention of a considerable area of land in leisure use and the provision of meaningful areas of new landscaping, is sustainable, viable and deliverable.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Site 509 is not allocated for housing or mixed use development because through the Strategic Housing and Employment Land Availability Assessment it is identified as not within, adjacent or immediately adjacent the main built up area of a settlement and is therefore not identified as a potentially suitable site.

## Walpole

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Wantidsen

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Wenhaston

Total comments	Support	Object	Observation
3	1	2	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

David Houchell Ltd promote site 564 'Land between Blyford Lane & Coles Hill', as has been deemed a suitable site in the SHELAA, for allocation in the Local Plan.

### Members of the Public

Members of the public stated their opposition to site 462 'Land to the East of Star Public House and South of St. Michaels Way', which has been identified as a suitable site. One such opposition is based upon the need to protect arable farmland, concern that any development would be of poor quality design and not in keeping with the character of the village, the safety of passing traffic outside the site as the road width is considered too narrow, and that the village has contributed its fair share of development. It is suggested that the only necessary development in the village should be infill. Another opposition to site 462 is in its landscape setting of the AONB to the east, the impact on the capacity of the local road network, and that the potential scale of the development, given the site size, would detrimentally alter the character of the village.

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan does not allocate any sites for development in Wenhaston. The approach of the Local Plan is for future housing to be planned for through a review of the Neighbourhood Plan as set out in Policy SCLP12.1.

## Westerfield

Total comments	Support	Object	Observation
4	4	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Westerfield Parish Council supports Policy SCLP12.22 designating 2 parcels of land in Westerfield for public open space which interfaces with the proposed country park, part of the Ipswich Garden Suburb as shown in the previous diagram. Propose two additional areas as open space.

Note that sites 805 and 806 are 'made available for open space'.

Site 1138 'Land at Church Lane', adjacent to these 2 sites, is a large site. Any development on this site would be inappropriate for a small village and should also be designated as open space.

These 3 sites, together with site 125 'Westerfield Road, Westerfield. Adjacent to Cubitt's site' will provide a continuous open space between land to the east of Westerfield and the country park, prevent any unwanted coalescence, and provide a continuous route for wildlife.

### Other organisations

None received

### Developers/Landowners

Site 192 'Land opposite Corner Croft, Sandy Lane' is immediately available and has no issues with delivery other than the provision of a footway link. Concept plan provided to show how the site could be developed including approximately 50 dwellings and open space requirements. The proposed allocation at Westerfield (SCLP12.64) is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017). This site has not yet been subject to a planning application despite having been identified in the DPD since 2015.

Site 168 'Land at Lower House Farm, Lower Road' should be allocated for future development as well as the land to the South of Lower Road.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Whilst site 192 is a deliverable and suitable site in the SHELAA characterised by not insurmountable

constraints, the Final Draft Local Plan strategy focuses growth away from communities surrounding Ipswich. The Final Draft Local Plan approach is not to identify new site allocations over and above the existing Local Plan Site Allocations document to reflect the village to reflect assimilation of nearby strategic growth at Ipswich Garden Suburb rather than. Site 192 is therefore not required for the Final Draft Local Plan strategy.

Site 168 is identified as below the threshold of 0.2ha for consideration for allocation.

## Westleton

Total comments	Support	Object	Observation
2	2	0	0

### Statutory Consultees

None received

### Parish and Town Councils

Westleton Parish Council promotes sites 371 'Land at Cherry Lee, Darsham Road', 877 'Land to the rear of The Vicarage, Darsham Road' and 447 'Land to the South East of Blythburgh Road' for residential development in place of the proposed site allocation SCLP12.65.

### Other organisations

None received

### Developers/Landowners

Evolution Town Planning Ltd, on behalf of Northchurch Ltd promote site 371 'Land at Cherry Lee, Darsham Road' for residential development of a mix of 1-4 bed homes with affordable. They suggest the proposed allocation on the B1125 be removed and replaced by site 371.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

The Final Draft Local Plan has evolved the approach to housing site allocations in Westleton to reflect consultation feedback to the First Draft Local Plan. The approach reflects that Westleton is a sustainable settlement in the north of the District. The site allocation is significantly reduced in development area and number of homes to respect the impact that a larger scale development could have. A new site allocation is introduced for 15 homes in the north of the village for Land at Cherry Lee, Darsham Road, Westleton (site 371).

## Wickham Market

Total comments	Support	Object	Observation
5	3	2	0

### Statutory Consultees

None received

### Parish and Town Councils

Wickham Market Parish Council wish to see the following sites reclassified to 'unsuitable' in the SHELAA; 7, 476, 785, 816, 878, 1045, 1055. The Neighbourhood Plan has considered these sites unsuitable in line with the Site Assessment Study carried out by AECOM.

### Other organisations

None received

### Developers/Landowners

Edward Carter comments that site 7 'Land adj to 14 and 16 The Cresnet, Dallinghoo Road' is a suitable site for the number of dwellings estimated within the SHELAA. It is suitable, available and achievable in the next five years and development could commence in 2021/22. A high percentage of dwellings could be suitable for first time buyers and self build plots. Affordable housing and open space would be provided in accordance with policy requirements. The site is well related to the Wickham Market settlement boundary. Dallinghoo Road would provide a suitable access and has a 30mph speed restriction. A footway, pedestrian crossing and road widening could be provided. The site is in level walking distance of services and facilities including the school. The site is well contained with hedgerows and trees. The area of surface water flooding is located to the very north west of the site and is not a constraint to development. Access and transport we identified as 'amber' in the SA but do not represent a constraint to development.

Edward Carter comments that site 816 'Land adj to Thong Hall, Thong Hall Road and South of Dallinghoo Road' is suitable, deliverable and developable and could commence in 2021/22. A high percentage of dwellings could be suitable for first time buyers and self build plots. Affordable housing and open space would be provided in accordance with policy requirements. The site is well related to the Wickham Market settlement boundary. The site can be accessed from Dallinghoo Road and the 30mph speed restriction could be extended. A footway and road widening could be provided. The site is in level walking distance of services and facilities including the school. The site is well screened by hedgerows and trees. The area of surface water flooding is a small part of the site and is not a constraint to development. Access and transport we identified as 'amber' in the SA but do not represent a constraint to development.

Edward Carter comments that site 1055 'Land adj. Gelham Hall, North of Dallinghoo Road' is suitable, deliverable and developable and could commence in 2021/22. A high percentage of dwellings could be suitable for first time buyers and self build plots. Affordable housing and open

space would be provided in accordance with policy requirements. The site is well related to the Wickham Market settlement boundary and the northern boundary adjoins the sports field providing opportunities for links / enhancements. The site can be accessed from Dallinghoo Road. A footway and road widening could be provided. The site is in level walking distance of services and facilities including the school. The site is screened by trees and hedgerows. The area of surface water flooding is a small part of the site and is not a constraint to development. The four 'amber' assessments could easily be addressed through development.

Edward Carter objects to SHELAA conclusions in relation to site 476 'Land at the Drift'. Site has access constraints due to being accessed from a shared access. Access onto High Street has poor visibility. The site is within a Special Landscape Area and lies across the Conservation Area. The site does not relate well to the existing built form. There are 5 'amber' scores to be addressed.

Edward Carter objects to SHELAA conclusions in relation to site 499 'Land West of Old School Farm, High Street'. Site access from High Street which serves industrial and commercial uses. The site adjoins Pettistree Conservation Area and is close to several Listed Buildings. A right of way runs through the site and along its boundaries. There are likely to be cumulative impacts on local roads and footpath widening would be needed. There are a number of constraints to development of the site.

Edward Carter comments in relation to site 878 'Land off Yew Tree Rise' that Spring Lane is unsuitable for access, and Yew Tree Rise is unsuitable. There are utilities infrastructure limitations. It is in a sensitive landscape setting and there are biodiversity constraints. Development would be delayed due to the need to relocate the allotments. There are 6 'amber' issues to address and the site is not considered suitable for residential development.

Edward Carter comments in relation to site 1114 'Simons Cross Allotments' that there is no footway provision at this site and there are amenity issues accessing via Simons Cross. The character and experience of the public right of way and bridleway would change, and diversion would delay commencement of development. There are biodiversity constraints due to trees and hedgerows. Development would be delayed due to the need to relocate the allotments. The site has 5 'amber' scores and is not considered suitable for residential development.

Hopkins Homes comment that the March 2018 Neighbourhood Plan consultation identified site 499 'Land West of Old School Farm, High Street' as a potential allocation for 80 homes with use of Penny Field for recreation and retention of the Old School building. It was one of two sites, of 27 assessed, identified as suitable options. Hopkins Homes has undertaken public consultation and intend to submit a planning application. Documents have been prepared to demonstrate that the site is suitable and deliverable. The site is within walking distance of a range of services and facilities, is well related to the settlement boundary and is not constrained by planning or environmental designations. This site, along with 1121, are the only sites unburdened by deficient highway access and are better related to the settlement boundary. Country lanes lead into Wickham Market on the east and west, however the south is served by the B1438. Appropriate and safe access can be achieved. The plan should be seeking to allocate additional sites, particularly in higher order settlements such as Wickham Market. The housing need figure should be 14,860 dwellings and Wickham Market's figure should therefore be proportionately increased to around 297 dwellings. Sites should be allocated in Neighbourhood Plan areas. The strategy of relying on Neighbourhood

Plans to deliver houses is unsound as there is no guarantee that plans would pass referendum. This site should be included as an allocation.

Edward Carter promotes a new site on land to the north of Wickham Market, site 1165 'Land north of Wickham Market'.

**Members of the Public**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The SHELAA assessments have been reconsidered however it is considered that these remain relevant in terms of the methodology identified for the District-wide SHELAA. Site 1165 has been assessed through the SHELAA and it is concluded that this would be a potentially suitable site.

The Final Draft Local Plan approach to Wickham Market is to provide an indicative minimum housing number of homes for the Wickham Market Neighbourhood Plan to consider any further housing allocations through the production of the Neighbourhood Plan.

## Witnesham

Total comments	Support	Object	Observation
3	2	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

In relation to site 995 'Land to the south of Primary School, Witnesham' Douglas Turner comments that the land would be difficult to use for any other purpose as land surrounding it is in different ownership. It is no longer used for farming. The value of the land for development for solely affordable housing has been a barrier to development in the past. SCLP12.67, Land at Street Farm, Witnesham is likely to be prone to flooding and is valuable for run-off. SCLP12.66, Land at Mow Hill, Witnesham is in agricultural use, access will be dangerous and there is only existing development on one side.

The SHELAA conclusion that the site is not within, adjoining, adjacent or well related to the form of the settlement' is wrong as Witnesham is a long village with a number of breaks in it. The land is within an existing development of houses, school and pub, and is within the 30mph speed limit. It is approximately 200m from the main bus route. Mains services are readily available. Four houses have recently been built 75 metres to the north east of the pub, which is further from the main settlement and is not served by a foot path. The site complies with policy SCLP5.4 Housing in Clusters in the Countryside. The owners would engage with Witnesham Parish Council to understand local needs for housing.

Theobold R E comments that site 995 'Land to the south of Primary School, Witnesham' would be difficult to use for any other purpose as land surrounding it is in different ownership. It is no longer used for farming. The value of the land for development for solely for affordable housing has been a barrier to development in the past. SCLP12.67, Land at Street Farm, Witnesham is likely to be prone to flooding and is valuable for run-off. SCLP12.66, Land at Mow Hill, Witnesham is in agricultural use, access will be dangerous and there is only existing development on one side.

The SHELAA conclusion that the site is not within, adjoining, adjacent or well related to the form of the settlement' is wrong as Witnesham is a long village with a number of breaks in it. The land is within an existing development of houses, school and pub, and is within the 30mph speed limit. It is approximately 200m from the main bus route. Mains services are readily available. Four houses have

recently been built 75 metres to the north east of the pub, which is further from the main settlement and is not served by a foot path. The site complies with policy SCLP5.4 Housing in Clusters in the Countryside. The owners would engage with Witnesham Parish Council to understand local needs for housing. A mix of affordable housing and private sector housing be an appropriate development for the site.

**Members of the Public**

None received

**How these comments have been taken into account in the Final Draft Local Plan:**

The SHELAA assessment has been reviewed however it is considered that site 995 is not suitable for allocation because it is not within, adjoining or immediately adjacent the main contiguous built up area of Witnesham. This approach is applied across towns and villages including those characterised by breaks in the built settlement.

## Woodbridge

Total comments	Support	Object	Observation
2	1	0	1

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

In relation to site 175 'Land at and surrounding Woodbridge Football club' Hopkins Homes comment that pre-application discussions and public consultation events have been held in respect of the redevelopment of the land for approximately 95 dwellings which would involve the relocation of the football club and St Audrys Sports and Social Club to the derelict Notcutts nursery on Yarmouth Road, Ufford and a small enabling development of 12 family homes at the current St Audrys site. The site is in a sustainable location with good access to local services and facilities and public transport options. It is adjacent to existing residential development and consider the site to be one of the most sustainable locations available to meet the growth needs of Woodbridge and recommend that it is allocated for residential development.

The Seckford Foundation comment that the Draft Plan highlights that the Town is one of the most expensive and thus unaffordable places to live in the District, the average house price being over £400,000 compared to c. £240,000 in Felixstowe and £220,000 in Saxmundham, where major new housing allocations are proposed. This in itself highlights the major flaw in the Plan failing to make any new residential allocations at Woodbridge. A temporary constraint on new housing allocations at Woodbridge earlier in the Plan would help readers to understand the reasons for the proposed spatial strategy and distribution of growth. Younger people and families, who will find it increasingly difficult to stay within the town due to the lack of new housing supply. Consider it likely that this will lead to a continued ageing of the local population.

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

Site 175 is within Martlesham Parish and these comments are therefor also considered under

Martlesham. The site is included as an allocation in the Final Draft Local Plan.

The strategy of the Local Plan focuses on the A12 and A14 corridors and growth in rural areas. Alternative strategies have been considered through the alternatives policies as part of production of the Plan. It is stated in the Plan that options around an Ipswich northern route will be considered in more detail through a review of the Local Plan and this would be the appropriate point at which to consider alternative strategies rather than phasing different strategies within this Local Plan.

## Yoxford

Total comments	Support	Object	Observation
0	0	0	0

### Statutory Consultees

None received

### Parish and Town Councils

None received

### Other organisations

None received

### Developers/Landowners

None received

### Members of the Public

None received

### How these comments have been taken into account in the Final Draft Local Plan:

No comments received to address.

## Appendix I – Schedule of new and amended sites submitted through First Draft Local Plan consultation

### New sites

Site Number	Site name	Parish	Use
1152	Land to the East of Street Farm, The Street	Kettleburgh	Unspecified
1153	Land to the West of Street Farm, The Street	Kettleburgh	Unspecified
1154	Land at Main Road & The Street	Tuddenham	Housing
1155	Land South of Main Road, adj. Fynn Valley Farm	Tuddenham	Housing
1156	Land at School Road	Knodishall	Housing
1157	Land West of Ronald Lane	Kelsale cum Carlton	B1, B2 and B8
1158	See 904 below	-	-
1159	North West Corner of Finches Hill, The Street, Little Bealings	Little Bealings	Housing
1160	Land south of Pitman's Grove	Bramfield	Housing
1161	Land at Manor Farm	Framlingham	Housing (part formerly 741, 742, 743)

1162	Land at 89 Waterloo Avenue	Leiston	Housing
1163	Land north west of Chapel Road	Otley	Housing
1164	Land adjacent to Wayside, Main Road	Tuddenham	Housing
1165	Land north of Wickham Market	Wickham Market	Housing
1166	Land north of Old maids' lane and Low Street	Brandeston	Housing
1167	Land at the junction of The Street and Riggle Street	Brandeston	Housing
1168	Land adjacent to 16 and 17 Low Street	Brandeston	Housing

**Amended sites**

<b>Site Number</b>	<b>Site name</b>	<b>Parish</b>	<b>New or amended site</b>	<b>Use</b>
108	Land adjacent to the Red House, Orford Road	Tunstall	Amended site area	Housing / mixed use
177	Land opposite the Depot, Yarmouth Road	Ufford	Amended site area	Very slightly amended. Use amended to either employment, mixed use or football club, formerly submitted for employment.
371	Land at Cherry Lee, Darsham Road	Westleton	Amended site area	Housing. Very slightly amended area.
427	Land north and south of Old Post Office Lane	Blaxhall	Amended site area	Housing (amended area)
430	Land at Grove Farm The Street,	Little Bealings	Amended use	Housing (was formerly submitted for mixed use)
435	Land north and east of The Manor House, Church Hill	Saxmundham	Amended site area	Housing (Extended site)
455	Land fronting The Street	Bawdsey	Amended site area	Housing (reduced site area)
560 / 1133	Land east of Woodbridge Road	Grundisburgh	Amended site area	Housing (extended)
640	Land between Roos and Saxmundham Road	Aldeburgh	Updated availability	No longer available
699	Bentwaters Park, Rendlesham	Rendlesham	Amended site area	Holiday lets (formerly submitted for housing)
765	Foxhall	Foxhall	Amended availability	Made available for employment (formerly available for mixed use)

904	Land to the north of 175 Saxmundham Road	Aldeburgh	Amended site area	Housing
997	Land adjacent to 187 Saxmundham Road	Aldeburgh	Amended site area	Housing (Extended site)
999	Land at the Police Headquarters	Martlesham Heath	Updated availability	Housing
1001	Land north of Otley House, Helmingham Road	Otley	Amended site area	Housing (Extended site)
1083 / 1082	Land north east of Humber Doucy Lane	Rushmere St Andrew	Amended use	Housing (1082 was formerly submitted for open space)

# Analysis of Responses to Questions on Preferred Options Sustainability Assessment and Habitats Regulations Screening Assessment

## Habitats Regulations Assessment

### Habitats Regulations Assessment – Screening Assessment

Total comments	Support	Object	Observation
70	1	67	2

#### Statutory Consultees

Natural England supports and agrees with the recommendations and conclusions of the HRA. In particular, they note the potential for risks in terms of air and water pollution, water resources, recreation, and urbanisation impacts. They also welcome the opportunity for further discussions, particularly in relation to recreational disturbance mitigation by means of RAMS, SANGS, net gain, and the use of the green infrastructure network.

#### Parish and Town Councils

No comments received

#### Other organisations

The RSPB comment that the Habitats Regulations Assessment Screening Report explains that all housing applications within the 13km zone of influence of European sites should be considered to have an in-combination recreational pressure effect resulting in Likely Significant Effects (LSE).

The full Appropriate Assessment will need to consider whether the in-combination recreational pressure effect of the total allocations can be adequately mitigated through the RAMS. Additional mitigation may be required, should it be considered acceptable to develop the full quota of allocations, and consideration must also be given to other impacts, including urban effects and water quality.

Several of the proposed sites have a need for project level HRA stated within the supporting text, and in some this is carried through into the policy itself. It is recommended that the need for HRA is included all relevant site policies.

Table 3 in the Habitats Regulations Assessment Screening Report states that there are 800 dwellings proposed at Westleton, while the draft Plan states that 35 are proposed.

Table 3 in the Habitats Regulations Assessment Screening Report incorrectly states that Policy 12.24 refers to a site in Saxmundham; this should be Aldeburgh.

Consideration should be given to recent case law in developing a legally sound approach to its incorporation into planning policy.

### **Developers/Landowners**

No comments received

### **Members of the Public**

#### Object:

Object (no comment)

The Council should be investigated.

Concern over impacts of traffic, light pollution, environment, schools, health, water, sewage, pollution, wildlife, parking, infrastructure, loss of agricultural land, noise, loss of play space, care for the elderly, emergency services, doctors

There are brownfield sites to build on.

Lack of needs

Impacts on the environment have not been properly assessed.

#### SCLP12.30

A number of comments are raised, as set out below:

Object no comment

No interest from Hutchinson Port / it is not needed.

Will not generate new employment.

Too many HGVs and issues when the A14 closed.

Concern over traffic / pollution.

Impact on wildlife.

Impacts of light pollution.

Impact on quality of life.

Impact on the school.

There are better sites on the other side of the A14.

SCLP12.51

A number of comments are raised, as set out below:

Concern over traffic, fumes and light pollution.

It is on the wrong side of the A14 for the railway.

It is not needed.

SCLP12.61

A number of comments are raised, as set out below:

Object no comment.

There should be no more building in Trimley

The roads and infrastructure can't cope.

There are not enough schools.

Impact on wildlife.

Disproportionate compared to other villages.

Loss of agricultural land.

Loss of access to countryside.

Impact on quality of life.

Issue of pollution

There are no jobs

SCLP12.62

A number of comments are raised, as set out below:

Object no comment

There should be no more building in Trimley

The roads and infrastructure can't cope.

Impact on wildlife.

Disproportionate compared to other villages.

Loss of agricultural land.

Loss of access to countryside.

Impact on quality of life.

SCLP12.2

Development will impact on primary school, destroy land and affect quality of life.

**How these comments have been taken into account in the Final Draft Local Plan:**

The Habitats Regulations Assessment has been carried out by Footprint Ecology. Footprint Ecology have considered the comments received in relation to the Habitats Regulations Assessment in taking forward the assessment. At First Draft Local Plan stage a Screening Assessment was published, and this has been progressed to include Appropriate Assessment where necessary to inform the Final Draft Local Plan.

Section 4 of the Habitats Regulations Assessment (December 2018) explains how those consultation responses have been considered.

Further discussion has taken place between Footprint Ecology and Natural England to consider the response and to also consider findings from the Appropriate Assessment, and amendments have been incorporated in the Plan based on the conclusions and recommendations of the Habitats Regulations Assessment in this respect.

In relation to comments from the RSPB, the needs for project level HRA have been specified in relevant policies as advised. Typographical corrections have been made in the HRA report. The Appropriate Assessment considers the potential for the Recreation Avoidance and Mitigation Strategy to mitigate impacts from the Local Plan and also considers urbanisation and water quality effects.

The comments from individuals have been considered by Footprint Ecology however it has been concluded that these comments did not relate to issues that would necessitate changes or actions in relation to the HRA.

# Sustainability Assessment

## **Sustainability Assessment**

Consultation responses to the Interim Sustainability Appraisal Report (July 2018) are presented in the Sustainability Appraisal Report, along with an analysis of how these have been considered in progressing the Plan and the Sustainability Appraisal

**Write to us**



Suffolk Coastal District Council  
Planning Policy and Delivery Team  
East Suffolk House, Station Road  
Melton, Woodbridge  
IP12 1RT

**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)**

suffolkcoastallocalplan@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.

<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/>

