Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

March 2019
This report contains the comments received in relation to the Sustainability Appraisal Report of the Final Draft Local Plan (December 2018) which were made during the consultation period 14 January to 25 February 2019. The comments are not summarised and show the text as submitted by the respondent. Representations received in relation to the Final Draft Local Plan or the Habitats Regulations Assessment are presented in separate documents.
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Bloor Homes Eastern (Duncan, Gary)

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<td>4.0 Assessment of Sites through the Sustainability Appraisal</td>
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4.1 The Environmental Assessment of Plans and Programmes Regulations (2004) require that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of the preferred alternative, and the rejections of others, be made set.

4.2 In addition, the NPPF requires the Local Plan to contain an appropriate strategy, taking into account the reasonable alternatives (Paragraph 35), stating that a sustainability appraisal, which meets the requirements of the European Directive on strategic environmental assessment, should be an integral part of the plan preparation process (Paragraph 32).

4.3 The Final Draft Plan is accompanied by the Sustainability Appraisal (SA) document, and specific sites identified at earlier stages in the plan preparation. Excerpts from the SA document concerning the two sites addressed by these current representations (Site Options 1087 and 1145) are contained at Appendix B. The site which is the subject of this representation is Site Option 1087.

4.4 The site assessment extracts contained at Appendix B show that there are no over-riding constraints to the sustainable development of both sites for housing, and that any negative impacts are capable of being satisfactorily mitigated through the masterplanning process, as already evidenced in the Draft Masterplan and Development Framework, attached to this representation at Appendix A.

<table>
<thead>
<tr>
<th>Attached documents</th>
<th>Bloor Homes Eastern - Land at Rushmere St. Andrew (Garden Village) Final (Appendices).pdf (7.5 MB)</th>
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4.0 Assessment of Sites through the Interim Sustainability Appraisal

4.1 The Environmental Assessment of Plans and Programmes Regulations (2004) require that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach; and that the reasons for the selection of the preferred alternative, and the rejections of others, be made set out.

4.2 In addition, the NPPF requires the Local Plan to contain an appropriate strategy, taking into account the reasonable alternatives (Paragraph 35). It states that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process (Paragraph 32).

4.3 As such, the SA/SEA that accompanies the Final Draft Plan will clearly be of significance in the determination of the spatial strategy for the distribution of development and the allocation of specific sites.

4.4 The Final Draft Plan is accompanied by the Sustainability Appraisal (SA) document, and specific sites identified at earlier stages in the plan preparation process. Extracts from the SA document concerning the two sites addressed by these current representations (Site Options 1087 and 1145) are contained at Appendix C.

4.5 The site assessment extracts contained at Appendix C show that there are no overriding constraints to the sustainable development of both sites for housing, and that any negative impacts are capable of being satisfactorily mitigated through the masterplanning process, as already evident in the Draft Masterplan attached to this representation at Appendix B.

Bloor Homes Eastern - Land at Rushmere St. Andrew (Smaller Land) Final.pdf (6.8 MB)
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### Brightwell, Harry

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<tr>
<td>Comment</td>
<td>Reason site 1155 is not preferred site is shown as &quot;Site 135 provides opportunity to enhance access to playing field.&quot; Attached document shows why this could not be implemented and is not consistent with National Framework Policy re safe environment and also not justified.</td>
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<tr>
<td>Attached documents</td>
<td>Draft Plan comments Sustainability Appraisal sent final page 192.pdf (69 KB)</td>
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<tr>
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<td>relates to page 1349 and 628. Details are in attachment. The evidence and scoring is incorrect for site 1155 and inconsistent with scoring of site 135. The plan is therefore unjustified as it has not taken into account the reasonable alternatives based upon correct evidence.</td>
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<tr>
<td>Attached documents</td>
<td>Sustainability Appraisal comments sent final page 1349 and 628.pdf (55 KB)</td>
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This comment relates to SHELAA Suitability Assessment page 557/8 for site 1155 and page 535 for site 135. (Cannot find where to include these in that document) However in the sustainability report they also relate to page 1349 for site 1155 and page 628 for site 135. They again show that there appear errors in the assessment when comparing site 1155 with site 135 which demonstrate the Plan is not justified as it has not taken into account reasonable alternatives based on proportionate evidence. NOTE this relates to Plan SCLP 12.63 Land of Keightley Way.

| **Attached documents** | SHELAA Suitability Assessment sent.pdf (60 KB) |
## Carlyle Land Limited

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<td>Mike</td>
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<tr>
<td>Agent Surname</td>
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| **Comment** | We urge revisions to draft policies 3.1, 12.18 and 12.19 sufficient to encourage further intensification and expansion of employment space in the areas to the east of Ipswich and to permit well designed and sustainable residential development which complements the existing and future infrastructure.

The Interim Sustainability Appraisal fails to consider all reasonable alternatives to such a policy, it considers only one additional option, i.e. no policy (pages 938 to 941 of Interim Sustainability Appraisal). We would urge a consideration of other reasonable alternatives which would consider the effects of policy options which seek to guide appropriate and proportionate scales and forms of development to complementary to the existing and emerging development, making the best and most efficient use of existing and committed infrastructure improvements.

Overall, we regret to observe that the proposed policy would not be found to be sound. |
There is little to celebrate in this draft plan.

It goes against all the aims and ambitions of this local charity of which I am a Trustee. I nominated the late Mr Woolf for the work he had done and for the charity he had set up. He was successfully awarded the Suffolk green award.

http://sorrinews.blogspot.com/2015/06/eadt-environment-celebration.html

Stepping Stones for Biodiversity: http://steppingstonesforbiodiversity.blogspot.co.uk/

The aims of the charity;

- To have small wildlife sanctuaries which are close enough to enable beetles, bumble bees, and other invertebrates, birds, reptiles and small animals to use them as Stepping Stones between areas of protected natural habitat so as to preserve genetic diversity
- To encourage the use of these wildlife sanctuaries to promote the interest in natural history, observation and recording by visiting groups or individuals (which include 'vulnerable groups' who may benefit from access to these precious spaces)

These plans will have a continued detrimental affect on the charity and it’s aims and objectives. It will irretrievably damage the small spaces which the Charity has been working on for 8 years.

The late Mr Woolf was a founder member of Save Our country Spaces as well. Growth and expansion is too high a price to pay for the proposed destruction outlined here in this plan.

THE FOLLOWING ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN
ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

As a Trustee I SUGGEST THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to;

NPPF 10. Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

“Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes.

This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

NPPF-11 Conserving and enhancing the natural environment is not adequately taken into account.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a “sustainable future” for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

1. DRAINAGE, Surface Water Drainage ; APPEARS NON-COMPLIANT and may not work.
2. FLOODING LIKELIHOOD may increase at Westerfield.
3. SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems ( eg recently at Rushmere)
4. TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS- no solutions
5. AIR POLLUTION and impact on our children’s health inadequate Air Pollution Action Planning
6. ADVERSE PRESSURES ON HOSPITALS, SCHOOLS & ACCESS TO GPs and SOCIAL CARE
7. ADVERSE EFFECTS OF ROAD WIDENING and REMOVAL OF TREES & VERGES
8. LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND
9. REMOVAL OF TREES, HEDGEROWS, HABITATS
10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW
**LOCAL JOBS**

The national planning policy framework TESTS of SOUNDNESS- NOT MET

suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

**Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

**Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

**Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT**

I suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

Ipswich is failing to address air pollution and it’s A Q Action Plan is inadequate. These SCDC proposals will exacerbate this critical problem.

(SEE ATTACHMENT FOR MAPS)

**General Comment**

As trustee of Stepping Stones and a resident of both Tuddenham, North Ipswich and Westerfield, I am appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Polices over recent years. I have have no confidence in their competence., nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.

Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for judicial review” PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018’

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-
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In effect SCDC have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

Our recent parish council meeting had the same findings:

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved- DRAFT- final.pdf

Policy SCLP 12.24 Land at Humber Doucy Lane

It was agreed to make representations on the basis of both Soundness & Legality –

› It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).
› It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.
› The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25th March 2019.

Specific Comments on SCLP 12.24

The public notices issued by IBC and SCDC are in the wrong locations for this area and are there is therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

The Parish of Tuddenham is ‘village’, a NOT a Local Service Centre (LSC) which is deemed necessary and required to take this growth and development. Rushmere village is a LSC but does not have facilities and therefore fails the criteria for a LSC.

The area in question SCLP 12.24 is part of the designated Green Rim and Green Corridor for Ipswich under current plan. It should remain so as there is a deficit of Green space in North and East Ipswich historically already identified in IBC Biodiversity and Open Space Policy Document.

This proposal is unsound as it takes no account of the established Biodiversity and Open Space BC Policy.

Policy CS16 Green Infrastructure, Sport and Recreation

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16 e.g. in relation to the protection and
enhancement of green corridors.

**Heritage and archeology**

The area in question is of great historic importance with listed buildings of Westerfield House and Allen Farm. The hedgerows are ancient and suggested to be thousands of years old. The area borders and overlooks the Fynn Valley County Wildlife site, footpaths and ancient green lane.

These proposals, along with IBC lead to a substantial and unacceptable loss of amenity which is unacceptable. These proposals, along with IBC lead to a substantial and unacceptable adverse impact on the local biodiversity, green infrastructure and local heritage.

**These development proposals by both SCDC and IBC**

- The road infrastructure is characterised as ‘rat runs’ unclassified roads or narrow roads with passing
- This area proposal will lead to the coalescence of Westerfield, Tuddenham and will adversely impact on the sensitivity of the Fynn Valley and the need to address light Pollution and ancient
- Post Brexit food security will be an issue with the need to protect “Best and Most Versatile” Grade 2 farming
- The delays and continuing viability issues of the Ipswich Garden Suburb persist which will impact on this proposal Therefore, this land area proposal is both unnecessary and premature.
- There is no mention of the Felixstowe Freight line planned increase and the adverse impact this will have on passenger rail services and transport mitigation.

The Plan go against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies;

- SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP15 Landscape and Townscape
- DM21 – Aesthetics
Like the North Fringe Protection Group, we also share their concerns, outlined here.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road:

1. The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018 Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc.

3. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.

4. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim”.

5. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim.

6. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.

7. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. The Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.
In our opinion it is too early to comment on the Sustainability Appraisal (SA) Report for several reasons, including:

- No SA of IBCs decision not to comply with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC’s non-adherence to Government Guidelines for IBC’s Air Quality Action Plan and the lack of a target to reduce air pollution in the AQAP and in the CS itself.
- No traffic modelling assessment without TUOC for the IGS development and whether the delivery of the IGS is sustainable.
- No sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required construction works.
- No air quality modelling/assessment of the CS for road traffic.
- No air quality or noise assessment in relation to rail transport. This is a major gap in the evidence base that risks rendering the CS unsound. AQ assessments are required for; the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollution clouds, additional freight to and from Port of Felixstowe, and additional freight in relation to the construction of Sizewell C.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. We reserve the right to comment on the SA as it is developed.

Attached documents
Charity_Trustee_Stepping_Stones_for_Biodiversity_Trustee_Robinson_Barbara.pdf (689 KB)
## Chillesford Parish Meeting (McGinity, Peter)

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<td>Peter</td>
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### Comment

Chillesford is part of the Countryside in line with the settlement hierarchy in the Local Plan so the relevant policy in relation to housing development is policy SCLP5.4 Housing in Clusters in the Countryside. The parish supports this policy but contend that its application in the SHELAA document to two sites in Chillesford is incorrect so in terms of representation, is not sustainable since it is not justified.

Before providing the reasons for our objections, it might be helpful to briefly describe the physical layout in relation to the two sites and the adjacent existing village development.

Chillesford lies on the B1084. In the centre of the village, there is a junction with Pedlars Lane which is a bridleway. Facing the highway, there is a row of 7 terraced cottages, known as Long Row and then four detached houses on Hertfords Place which has access via an internal driveway. Beyond Long Row and Hertfords Place is the site 178. There is then the four dwellings which form the Flagship Housing estate with their access onto Pedlars Lane. Then there is the site 703. Beyond this site is open countryside.

Both sites 178 and 703 are indicated as potentially developable, coloured yellow in the first draft Local Plan alternative sites document (pages 39 and 40) and similarly described in the SHELAA.

The Parish contends that neither of these sites meets the requirements of policy SCLP5.4

The first point is that the Flagship housing is not a cluster as defined in the policy. The policy states that a cluster consists of a continuous line of existing dwellings or a close group of existing dwellings adjacent to an existing highway and contains five or more dwellings. Flagship housing contains only four dwellings and is not adjacent to an existing highway so cannot count as an existing cluster in line with SCLP 5.4.

Taking site 703, the policy states that development consists of infilling within a continuous built up frontage, is a clearly identifiable gap within an existing cluster or is otherwise located adjacent to existing development on two sides.

None of these conditions apply to site 703.
Further the policy states that the development does not represent an extension of the built up area into the surrounding countryside beyond the existing extent of the built up area surrounding or adjacent to the site.

Site 703 does represent an extension of the built up area into the adjacent countryside.

Finally the criteria in SHELAA for suitability includes access. Since access is via a bridleway, this is not sustainable.

For all these reasons, we contend that site 703 does not meet the requirements of policy SCLP5.4 so is not suitable for development.

Turning to site 178, on the south side there is Long Row and Hertfords Place which do constitute a cluster. However since Flagship Housing to the north is not a cluster, the site does not meet the requirement that it is surrounded on two sides by existing clusters.

The site also fails to meet two of the criteria for suitability with the SHELAA, namely access (criteria 1) and utilities capacity (criteria 2).

Access to the site is either by Pedlars Lane, a bridleway not a highway so unsuitable or by Hertfords Place. This privately owned pea shingle single track driveway is already used beyond its capacity according to SCC highways guidance so is equally unsuitable.

Turning to utilities capacity which covers wastewater network including drainage. Existing development in Hertfords Place has had ongoing drainage problems since it was built some 15 years ago. This was only recently resolved under the NHBCC insurance scheme. Development of site 178 would face the same problem but with no access to a ready solution so fails to meet criteria 2.

Thus the Parish contends that site 178 also fails to meet the requirements of policy SCLP5.4 and also fails two of the criteria for sustainability in SHELAA so is not suitable for development thus its designation is not justifiable.

Policy SCLP5.4 also states that where more than three dwellings are proposed, the applicant must demonstrate that the scheme has the support of the local community. Given the strength of feeling expressed at Parish meetings on these sites, this is most unlikely to be forthcoming.
Christchurch Property Company Limited

Comment ID 11
Organisation Name Christchurch Property Company Limited
First Name
Surname
Agent Organisation Name Richard Brown Planning Limited
Agent First Name Richard
Agent Surname Brown
Comment Sustainability Appraisal

We write in response to the publication of the Suffolk Coastal Local Plan Final Draft and the corresponding consultation on behalf of Christchurch Property Company Limited (hereinafter referred to as “Christchurch”). This representation considers the tests of soundness in the National Planning Policy Framework.

Tests of Soundness

This submission is framed in the context of the requirements of the Suffolk Coastal Local Plan Review to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF, Revised 2019), paragraph 35. For a Plan to be sound it must be:

Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

This submission considers the matters of housing need, sustainability and characteristics of the site.

A review of the Council’s Sustainability Appraisal has been carried out by Jam Consult Ltd and is appended to this representation. The report identifies a number of issues with the Council’s Sustainability Appraisal process and recommends that these issues are
resolved prior to the further progression of the plan. Full details are provided in the report however the key concerns are as follows:

**Paragraph 018** of the National Planning Practice Guidance sets out how the SA should assess alternatives and identify likely significant effects. The SA has failed to carry out the assessment according to the regulations and guidance above, particularly in respect of the following:

Lack of appropriate discussion on how the options were selected.

Inadequate prediction and evaluation of the effects of the preferred allocations and reasonable alternatives

Failure to link to the appropriate evidence to support the decisions taken

Failure to provide an outline of the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred allocations in the light of the alternatives

Inadequate assessment of cumulative impacts

Failure to identify suitable mitigation measures

Failure to show how the responses to the consultation have been taken into account

Failure to provide conclusions on the overall sustainability of the different alternatives

Failure to show how the SA has informed the Local Plan.

The review of the SA process has shown that SCDC’s approach cannot be considered to be an appropriate strategy given the reasonable alternatives as the SA process has failed to comply with the necessary guidance and regulations. In particular, the review has found that the selection of the preferred housing allocations is not substantiated by the SA report or available evidence and has revealed a flawed approach to the assessment.

The failures identified in the assessment demonstrate that the findings cannot be considered credible, justified or robust and can only lead to the conclusion that the SA is not fit for purpose or legally compliant and that the First Draft Local Plan can therefore not be considered sound.

**Conclusion**

This representation is written in support of an increase in the objectively assessed need for the district, that sites are allocated in the plan within the AONB and that the Council’s Sustainability Appraisal process and conclusions are fundamentally flawed, thereby with regard to these considerations, the plan is considered unsound.

I trust that our comments will be taken into account in progressing the preparation of the local plan and I would be grateful if we could be notified of any further consultations.

**Attached documents**

- R001v5 - Suffolk Coast Rep RB.pdf (276 KB)
- REDWALD RD, RENDLESHAM_Reps_SA_JAM_February 2019.pdf (344 KB)
- Redwald Road_Apendices_February 2019.pdf (267 KB)
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan
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| **Comment** | We urge revisions to draft policies 3.1, 12.18 and 12.19 sufficient to encourage further intensification and expansion of employment space in the areas to the east of Ipswich and to permit well designed and sustainable residential development which complements the existing and future infrastructure.

The Interim Sustainability Appraisal fails to consider all reasonable alternatives to such a policy, it considers only one additional option, i.e. no policy (pages 938 to 941 of Interim Sustainability Appraisal). We would urge a consideration of other reasonable alternatives which would consider the effects of policy options which seek to guide appropriate and proportionate scales and forms of development to complementary to the existing and emerging development, making the best and most efficient use of existing and committed infrastructure improvements.

Overall, we regret to observe that the proposed policy would not be found to be sound. |
| **Attached documents** | 190225_DrftLPRps.docx (2.9 MB) |
Colbear, Kevin

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| Comment | Site No. 1165, land adjacent to Wickham Market in Pettistree 'settlement', proposed housing of 150 dwellings.

We would like object to this proposal as we feel this development dramatically increases the size of the village of Wickham Market when there are already plans for 110 new dwellings at the Old School & Simon's Cross allotments. The village amenities/services (road infrastructure, doctors surgery capacity, etc) will not be able to cope with the additional number of residents and the huge increase in new housing will change the character and 'community feel' if the village.

| Attached documents |  |
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

Cook, P

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<td>Agent First Name</td>
<td>Barbara</td>
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<td>Robinson</td>
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| Comment | Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page )

PLEASE let other affected residents know and question your local Councillors The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport. air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure'.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by this plan.

The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10' Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan are inadequately
and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) “serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

NPPF- 11. Conserving and enhancing the natural environment

Taking Full Account of Cumulative and Compound Effects

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion.

These Aspects Need to Be Fully Assessed in Order for the CS SA to Be Sound

1. Drainage, Surface Water Drainage: Appears non-compliant and may not work.
2. Flooding likelihood may increase at Westerfield.
3. Sewage proposals inadequate & likely to add to existing problems (e.g. recently at Rushmere)
4. Traffic proposals and adverse impacts on existing residents – no solutions
5. Air pollution and impact on our children’s health inadequate Air Pollution Action Planning
6. Adverse pressures on hospitals, schools & access to GPs and social care
7. Adverse effects of road widening and removal of trees & verges
8. Loss of high grade local food growing land
9. Removal of trees, hedgerows, habitats
10. Country Park – delivery appears unlikely until 2025 or later
11. Where is the need for these houses and flats bearing in mind the lack of new local jobs?
Denton, Charles

2.3 SCDC’s Sustainability Appraisal dated December 2018 for the site is flawed for the following reasons using the same notation as in the appraisal sheet:

3. Incorrect positive attribution - development of the site cannot seriously be said to improve health inequalities when Ipswich hospital is 20 miles away and the nearest GP practice in Framlingham is over capacity and 3 miles away

6. Incorrect positive attribution - development will not conserve or enhance water quality and there is an identified existing flood risk which development will only increase

8. Should be double negative - development will definitely have a damaging effect on air quality by significantly increasing the need for travel by car for work, schools and other facilities as Dennington only has access to a very restricted bus service

10. Should be double negative - restricts ability to reduce emissions of greenhouse gases

11. Incorrect positive designation – should be negative - there is evidence of existing surface water flooding

13. Incorrect positive designation – development cannot possibly enhance or conserve biodiversity and geodiversity

14. Incorrect positive designation – should be double negative - development must be in direct conflict with objective to conserve and enhance areas of historical importance – incorrect distances stated from listed buildings (50m not 82m) and site immediately adjoins village Conservation Area – no site-specific Sensitivity Assessment has been undertaken

15. Incorrect positive designation – should be double negative – in direct conflict with objective to conserve and enhance distinctiveness of landscapes – takes no account of proximity of Alde Valley, intrusion into rural landscape and the Strategic Objectives of the Suffolk Coastal Landscape Assessment Report – will cause demonstrable harm to the traditional rural character of Dennington
17. Incorrect neutral designation as development in rural area will harm ability to enhance the vitality and viability of town and retail centres – will encourage online sales purchases

18. Incorrect positive designation – should be negative - objective to support sustainable travel is undermined by minimal access to bus services and to train only accessible by car.

If the Sustainability Appraisal had been undertaken with proper assessment of the criteria as they should be applied to this site it should not have been designated as being suitable for development in a Small Village. The Policy is therefore unsound and without proper justification.
Dowley, Justin

Comment ID 9

Organisation Name

First Name Justin

Surname Dowley

Agent Organisation Name Cerdu Planning Ltd

Agent First Name Michael

Agent Surname Robson

Comment

1. Introduction

1.1. Cerda Planning has been instructed by Mr Justin Dowley to prepare representations to the Suffolk Coastal Local Plan Regulation 19 Stage Consultation. The main focus for the representations relates to Land North and East of Manor House, Church Hill, Saxmundham. These representations will set out the background to the site in the context of the Suffolk Coastal Local Plan which provides a vision for the communities of Suffolk Coastal up to 2036 and recognises the diversity of the area. The representations will then focus on demonstrating that the site is available, suitable, economically viable and specifically deliverable for years to one to five of the Suffolk Coastal Local Plan period.

1.2. The representations will focus on key issues including landscape, transport and drainage, identifying that the Council have incorrectly assessed the site within the Suffolk Coastal Local Plan Sustainability Appraisal and as such have undermined its opportunity to assist in delivering strategic growth within the settlement at Saxmundham. The Framework states that planning should be genuinely plan-led which should set out a positive vision for the future of an area. The Framework also sets out that Plans should be kept up-to-date and based on joint working and cooperation to address wider local issues. Plans should provide a practical framework in which decisions on planning applications can be made with a high degree of predictability and efficiency.

Plan Making Context

1.3. The Framework stresses that authorities should objectively identify the housing, business and other development needs of an area responding positively to opportunities for growth within an area taking account of market signals such as land prices and housing affordability. It goes on to advise that this information should advise Local Plans by setting out a clear strategy for allocating such land for such development.

1.4. In relation to plan-making the Framework is clear that the plan is the key to delivering sustainable development and all planning decisions must accord with the adopted Plan. Plans should identify and set out the strategic priorities for an area by planning positively to provide housing, retail, leisure and commercial development. This is encouraged through the allocation of land being identified as suitable for such
1.5. These allocations should be based on an adequate, up-to-date and appropriate evidence base including relevant market and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.

1.6. In relation to housing the Framework sets out that local authorities should have a clear understanding of the housing needs within their area. The Framework goes on to state that local authorities should prepare a Strategic Housing Market Assessment to fully understand the housing needs for the area and, where necessary, work across administrative boundaries to identify the scale and mix of housing that is required to meet the needs of the local population over the Plan period.

1.7. Such assessments should ensure that the housing needs of all different groups of society are catered for and that the scale and supply of housing is necessary to meet this demand during the plan period.

2. **Background**

2.1. It is our view that the Suffolk Coastal Local Plan in its current form fails to conform to the guidance within the NPPF. The Council have not assessed residential allocations and alternative sites based on adequate, up-to-date and appropriate evidence base, including relevant market and economic signals. These representations will outline how the Council have failed in their duty to provide a robust assessment that demonstrates all sites submitted to the Council have been assessed logically taking on board the available evidence. In particular, serious concerns are raised in relation to the omission of site 435 - Land North and East of the Manor House, Church Hill.

2.2. Our client has previously submitted representations throughout the Local Plan process, including the Regulation 18 stage, setting out the site is capable of assisting the Council in delivering their housing requirement of 10,476 dwellings over the plan period and in particular delivering 800 homes at Saxmundham. The site itself extends to 21.9 hectares, a site location plan can be found at Appendix 1.

2.3. Prior to the Regulation 18 stage, the site had been submitted as part of the Council’s Call for Sites exercise in October 2016 with subsequent representations made in October 2017 to the ‘Issues and Options’ Consultation.

2.4. At Regulation 18 stage Bidwells were instructed to submit representations on behalf of Mr Dowley and in doing so provided the Council with supporting technical evidence demonstrating that the site is free of constraints and as such well placed to assist the Council in delivering growth at Saxmundham.

- The Council’s Local Plan making timeline is set out below;
- Call for Sites exercise – October 2016
- Issues and Options consultation – August 2017
- First Draft Local Plan - Summer 2018
- Proposed Submission Plan – February 2019

2.6. Having reviewed the Regulation 19 consultation documents, it is clear that whilst the site 435 has been reassessed, the Council have provided no evidence that the
supporting technical evidence has been considered or any updated conclusions drawn.

**Sustainability Appraisal Background**

2.7. The Submission Plan consultation also provides an opportunity to review and comment on the Sustainability Appraisal which underpins the Local Plan. The Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives.

2.8. In accordance with Article 5(1) of the SEA Directive and regulation 12(2) of the SEA Regulations, the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.

2.9. Alternatives is the SEA/SA stage that has been most consistently challenged at examination/inquiry and in the courts. Three sets of information are needed for each set of alternatives:

- What reasonable alternatives have been identified and on what basis?
- How they have been assessed and compared (including how sustainability issues have been considered)?
- What are the preferred alternatives and why they are preferred over other alternatives?

2.10. It is our view that Suffolk Coastal District Council in failing to assess site 435 and its supporting technical information are in clear breach of the above guidance having failed in their duty to review all reasonable alternatives. As a result the lawfulness of the Council’s SA which underpins the Local Plan is questioned.

3. **Sustainability Appraisal review in relation to site 435**

3.1. Policy SCLP12.28: Strategy for Saxmundham of the Suffolk Coastal Local Plan identifies that development at Saxmundham will enhance the settlement as a prominent market town, with a greater provision of employment, housing and community facilities. The Plan specifically states that through a Garden Neighbourhood, an education led scheme of approximately 800 dwellings, community facilities and employment land will be delivered.

3.2. In light of the previous consultation stage and work undertaken by Richard Buxton Environmental Law in relation Policy SCLP12.29: South Saxmundham Garden Neighbourhood (previously referred to as SCLP12:26), it is our understanding that 800 homes cannot be delivered within the land proposed to be allocated within the Suffolk Local Plan. It is therefore surprising that given 800 homes must be delivered in order to provide education and community facility provision that the Council have not reassessed alternative sites in order to ensure additional land is available to deliver the provisions of Policy SCLP 12.29. This in itself is a clear concern in terms of delivering housing growth.

3.3. In addition to the above SA failings, it is important to recognise inconsistencies
with not only the Sustainability Appraisal approach but also its scoring methodology. Given that it has been evidenced that the current land parcels comprising policy SCLP 12.29 cannot deliver 800 houses and as result undermine the delivery of education provision, it is concerning that the SA scores these sites ‘++’ in relation to education. Despite the failings of this combination of sites, it is further perplexing as to how the sites have actually improved from a ‘+’ scoring during the Regulation 18 SA (first Draft local Plan).

3.4. In light of the above, the SA contains material failings in relation to allocation SCLP12.29 itself and the SA scoring that underpins the Council’s justification.

3.5. Turning our attention to site 435 itself, the site has been included within option 1 and option 8 of the alternatives assessed within the SA.

Option 1 - Development on the Southern half of 435, 559 and northern half of 714

3.6. This option was considered as part of the assessment of options to inform the First Draft Local Plan. As the northern part of site 435 originally submitted is not available during the lifetime of this Local Plan there is not scope to consider a comprehensive development elsewhere in the town. Development across different locations would not provide the opportunity for a master planned approach to delivery of infrastructure.

3.7. The justification provided by the Council in relation to site 435 is factually incorrect, representations were submitted at Regulation18 stage clearly outlining that the site is available immediately and therefore it is unknown why the Council are claiming that the site is not available over the lifetime of the plan. This is a fundamental flaw in the SA process, clearly highlighting a failure to appropriately assess reasonable alternatives based on the latest evidence available.

3.8. In relation to dismissing site 435 on the basis of a split site strategy, this approach is also flawed and close minded. The Council are clear in their policy wording that the allocation at Saxmundham will deliver 800 homes in addition to employment, education and community facilities. It been demonstrated that the allocated site is not capable of delivering 800 homes in its current form and therefore alternative sites must be assessed. As a result it is extremely likely that in order for the Council to deliver this allocation spilt sites must be considered. Whilst to some extent this would prevent a master planned approach, it ensures that policy SCLP 12.29 is actually deliverable. In its current form the allocation is flawed and therefore it is not a legitimate position to fall back on dismissing the site due its location. This is a close minded approach and could prevent sustainable development from being delivered.

Option 8 - Development on the Southern half of 435, 559 and northern half of 714 (Amended site 435)

3.9. The Landscape Sensitivity Assessment identifies the area to the east of Saxmundham as being sensitive. In this option, the tree line which runs north-south through the site to the east of Saxmundham is considered to form the eastern extent of the built development. The transport modelling has also shown that development to the east of the town will have a greater impact upon the capacity of the crossroads. This approach would also result in a ‘split’ site for the Garden Neighbourhood development.

3.10. Further concern is raised in relation to the above justification for dismissing
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

option 8. The split site reasoning has been addressed above with landscape and highways concerns addressed later in this report when providing a reassessment of site 435.

3.11. The National Planning Practice Guidance (NPPG) sets out that a Sustainability Appraisal is a systematic process that must be carried out during the preparation of a Local Plan. The appraisal must set out how sustainable development is achieved, in doing so assessing reasonable alternatives, achieving environment, economic and social objectives.

3.12. The Sustainability Appraisal offers an opportunity to ensure that proposals within the Local Plan are the most appropriate and suitable having assessed reasonable alternatives. The Sustainability Appraisal underpins the Local Plan and as such its lawfulness is a requirement in the overall plan making process. Importantly guidance sets out that Sustainability Appraisal should be an iterative process informing the Local Plan prior to the completion.

3.13. In light of this guidance, it is our view that the Council’s assessment of alternative sites in relation to allocation SCLP 12.29 is fundamentally flawed as they have failed to undertake a comprehensive assessment/appraisal of alternatives utilising up to date information and in doing so ensure that 800 homes can be delivered at Saxmundham.

3.14. Given that the SA methodology and assessment of reasonable alternative goes to the heart of the SA process, the SA is fundamentally flawed and as such, not fit for purpose.

4. Site 435 Reassessment

4.1. In order to address the Council’s reasoning for dismissing site 435, it is important to provide a reassessment of site 435 outlining that the site is suitable for an allocation within the Suffolk Coastal Local Plan. The assessment provides a general overview of the site, before conducting a review of the site against the criteria outlined in the Council’s Suitability Assessment which underpins the SA process itself.

4.2. The site lies on the edge of Saxmundham to the north east of the settlement. Residential development is located to the south and west of the site with an existing residential allocation being carried forward from the Council’s adopted Site Allocations DPD (January 2017) lying adjacent to the site. On delivery of this allocation, the site will be located adjacent to the existing settlement boundary, providing an opportunity for the site to be considered as a logical extension to the built form of Saxmundham.

4.3. The site has previously been assessed as having the potential to deliver 435 dwellings within the SHELAA, however it is worth noting that this assessment did not include the full extent of the site, with a further 15ha not assessed, clearly there the site has capacity to deliver well in excess of 435 dwellings.

4.4. The site contains no landscape designations and lies within Flood Zone 1.

5. Suitability Assessment
5.1. The analysis below has used the Council’s own scoring criteria as outlined within the Suitability Assessment - Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018) in order to provide an up to date assessment of site 435.

Access

5.2. A technical note prepared by AECOM supported representations for this site during the Regulation 18 consultation stage (first draft Local Plan) which outlined how the site could be provide two accesses. The note can be found at Appendix 2. In summary the technical note states that;

5.3. Access to the development would be provided from Church Hill in the form of a new junction. A review of the requirements in terms of the guidance set out by Suffolk County Council (SCC) and applied by SCDC has been carried out.

5.4. The Suffolk Design Guide for Residential Areas states that for development providing up to 300 dwellings, a single point of access with an emergency access would be sufficient. For a greater number of dwellings, a secondary access would be required.

5.5. The frontage of the development is of sufficient length to provide two points of access. This is achievable when the existing posted speed limit of 60 mph is reduced to 30 mph. Given that the site would act as an urban extension of Saxmundham, the speed limit will be reduced and extended to the east of the site boundary. This would require frontage development, street lighting and footways to be extended to create a more urban feel in keeping with a lower speed limit. This suggests that up to 600 dwellings could be accessed from Church Hill.

5.6. If a primary school was to be provided on site, then the preference of SCC would be that it would be situated close to a site access. If two accesses were provided at the site, they would interconnect as part of the internal road layout.

5.7. In addition there are a number of options to provide an emergency access;

- Along the site frontage to Church Hill;
- Using the land owners track that extends east and accesses Church Hill; and
- Subject to agreement, provide emergency access through the adjacent Church Hill Saxmundham Residential Development.

5.8 AECOM have reviewed the Regulation material 19 and have confirmed that the above access arrangements remain achievable. A formal covering letter can be found at Appendix 3.

5.9 Given that AECOM have demonstrated that the site can provide two points of access in addition to a range of emergency access options, it is surprising that the Council continue to score the site amber in terms of access. AECOM responded directly to comments within the Council initial site suitability scoring, only for the Council to replicate comments at the Regulation 19 stage. It is our view that the Council have failed to give due consideration to the technical note and in doing so have failed to assess the site based on up to date information.

It is also worth noting technical guidance within Suffolk Design Guidance outlines that single points of access should only serve up to 300 dwellings. Whilst site 435 benefits from two accesses, it is noted that the proposed Saxmundham Garden Neighbourhood is
to be served by only one access due to considerable concerns over whether a proposed second access is deliverable.

Flood Risk

5.10 A flooding and constraints drainage report was prepared as part of Regulation 18 (first draft Local Plan) representations in relation to the proposed allocation SCLP12.29 (previously SCLP:12.26) submitted on behalf of local residents as part of the Leave the Layers Alone submission. The report focuses on assessing a range of drainage and flooding options across strategic sites and reasonable alternatives within Saxmundham.

5.11 The report helpfully provides commentary on site 435 itself outlining that the site ranks the highest in terms of drainage and flooding when compared against strategic sites and reasonable alternatives within Saxmundham, including the Council’s preferred site. The report is included at Appendix 4, however, its conclusions have been summarised in the below table. As a result of this evidence, the legitimacy of the Council’s scoring can be further questioned.

(see table 1. Drainage summary in ‘Suffolk Coastal Local Plan Regulation 19 Stage Consultation pdf.’)

Landscape and Townscape

5.13 The Sustainability Appraisal outlines that concerns are raised in relation to the area to the east of Saxmundham as being sensitive. In this option, the tree line which runs north-south through the site to the east of Saxmundham is considered to form the eastern extent of the built development. An LVIA assessment accompanies this submission in order to address this point. The LVIA can be found at Appendix 5.

5.14 In summary the submission outlines that the application site is considered appropriate for development for a number of reasons;

- It is located in an area with limited landscape, cultural or ecological assets, compared with the more sensitive sites within the Saxmundham area closer to the river valley. It is thus an area considered to have a Low/Medium Landscape Sensitivity;
- The general openness of the landscape suggests that Visual Sensitivity is considered to be Medium/High, although with a high potential for mitigation in the form of enhanced landscape structure, green corridors and visual screening;
- Landscape Value is considered to be it is a site with no specific landscape or other designations, significant landscape value, or any particular cultural associations; and
- The site is unaffected by any public rights of way.

5.15 In light of the LVIA findings above, it is clear that site 435 has a medium/high capacity for development demonstrating that the site is able to accommodate development to the east of The tree line referred to is a somewhat arbitrary boundary, as it is a remnant of a more robust landscape structure, and would not be affected by the proposals anyway.

5.16 The LVIA concludes that there are opportunities to improve and enhance local ecology and biodiversity through woodland buffer and open space.

5.17 It is clear that the Council have failed to properly assess site 435 in relation to landscape concerns and as a result have scored the site incorrectly, prejudicing its opportunity to be considered as an allocation or as a reasonable alternative. On this
basis alone, the methodology of the SA can be questioned with its conclusions given little weight.

Biodiversity

5.18 The Council outline that development of site 435 could cause harm to biodiversity as the north west corner of the site is occupied by a wooded area and may be of biodiversity value. A TPO Woodland also covers an area to the south west of the site. Small parcels of the site also fall within a number of SPA and SAC’s. However, given the size of the site, development would not put pressure of these natural assets. In fact, the site offers an opportunity to provide significant enhancements for biodiversity.

5.19 Indeed, the supporting LVIA outlines that;

*The main development site has little ecological or biodiversity value, being an arable field, although any remaining Oaks and farm ponds are significant and should be retained and incorporate into any green corridors. The introduction of new and replacement hedgerow and tree planting is likely to have value as habitat for birds and other wildlife. Mitigation planting will be of native species or non-ornamental species which promote biodiversity and be in keeping with and guided by landscape character considerations.*

5.20 The report concludes that;

*There are opportunities to improve and enhance local ecology and biodiversity through the creation of a woodland buffer as well as open space, trees and hedgerows within the development itself. Existing vegetation will be retained where possible, whilst new planting will reinforce and enhance the wildlife value of the site.*

5.21 In light of the above it is our view the Council have incorrectly scored the site for biodiversity.

Transport Roads

5.22 As outlined above, representations for site 435 at Regulation 18 stage (first Draft Local Plan) were supported by a technical note from AECOM which set out the site’s suitability in terms of connectivity to the existing walking, cycling and public transport facilities as well as local amenities and facilities. The technical note also undertook an assessment of the capacity of junctions in the area establishing if there are any highway capacity constraints to the development coming forward.

5.23 The report is comprehensive in nature and concludes that the site could deliver 480 dwellings alongside a school. It is also important to consider the proposed Route D2 of the Four Villages Bypass which is being promoted by Suffolk Coastal Council. The road itself would remove a significant amount of through traffic from the centre of Saxmundham and the B1119 Church Hill / High Street / B1121 South Entrance / Chantry Road signalised which is currently travelling towards Leiston and Sizewell nuclear power station. This in turn would release capacity at the B1119 Church Hill / High Street / B1121 South Entrance / Chantry Road such that a greater number of trips could be accommodated. This would clearly be very beneficial to site 435 and would provide the Council with an opportunity to allocate further land at a sustainable, accessible and deliverable location.

5.24 The Council score site 435 as amber in terms of Transport and Roads due to
potential impacts on Church Street junction and potential impact upon Church Street signalised junction. Given the AECOM report directly assess this and provides a detailed breakdown of its methodology and conclusions, it is apparent that the Council have not fully assessed site 435 in light of up to date evidence.

5.25 AECOM have reviewed the regulation 19 documents and have confirmed that the conclusions remain unchanged. The technical note has been resubmitted in the expectation that it is properly considered and conclusions analysed.

Compatibility with neighbouring uses

5.26 The Council provide very limited justification for scoring site 435 as an amber aside from its close proximity to the railway to the north of the site. The large coverage of the site provides an opportunity to ensure that dwellings and education provision is located away from this boundary. Any scheme put forward will be able to provide a sufficient offset from the railway line and ensure that appropriate mitigation is implemented so that any future occupiers, users have a high level of amenity.

5.27 Given it is not uncommon for sites to be developed in close proximity to railways, we do not agree with the Council’s scoring.

Concluding remarks

5.28 It is our view that the Council have failed to conduct a proper assessment of site 435 in relation to the above criteria utilising up to date evidence. As outlined previously, assessing reasonable alternative sites is an iterative process in terms of methodology and site scoring. Given that the Council have failed to consider up to date technical information in relation to reasonable alternatives there has clearly been a break in the iterative process required by planning policy and guidance. Given that the SA methodology and assessment of reasonable alternative goes to the heart of the SA process, the SA is fundamentally flawed and as such, not fit for purpose and unlawful.

Suitability Assessment findings

5.29 Having conducted the above Suitability Assessment, it is possible to use the Council’s scoring system to create a clear and reasonable comparison. The table below provides an overview of our scoring comparison exercise.

5.30 (See attached table 2. Suitability Assessment Comparison, in ‘Suffolk Coastal Local Plan Regulation 19 Stage Consultation pdf.’)

5.31 The above scoring comparison clearly highlights that the Council have incorrectly scored the site in relation to access, flood risk, landscape and townscape, biodiversity, transport and roads and neighbouring uses. Our analysis has shown site 435 scores green in 13 out of 14 scoring criteria. Having reassessed site 435 using the Council’s Suitability Assessment framework and criteria, it is clear there are several fundamental flaws which the Council have failed to address. They have failed to consider site 435 or review the latest up to date information and therefore have not carried out a proper assessment of the reasonable alternatives available. The Council have vastly underscored site 435 and in doing so have unlawfully dismissed an available, suitable, economically viable and deliverable site.

5.32 It is our view that without a revised assessment taking into consideration the
revised scores recorded above, the Council’s preferred strategy is fundamentally flawed and leaves the Council at risk of legal challenge. The shortfalls within scoring go to the heart of the Council’s assessment and must be revisited.

6. Conclusion

6.1 These representations to the Suffolk Coastal Local Plan have provided an assessment of the Suffolk Coastal Local Plan in relation to the Council’s Sustainability Appraisal, its scoring methodology, assessment of reasonable alternatives and reasoning behind dismissing site 435 - Land North and East of the Manor House, Church Hill, Saxmundham.

6.2 It is our view that the Council have failed to properly assess reasonable alternatives to the proposed Garden Neighbourhood within Saxmundham and as a result are in clear breach of guidance with the NPPG and SEA Directive. In conducting their assessment of reasonable alternatives, the Council have failed to consider the following;

- The proposed allocation SCLP 12.29 cannot deliver 800 homes;
- Up to date technical information in relation to site 435; and
- Have not based their decision on an accurate suitability assessment.

6.3 These representations and accompanying scoring exercise have identified that site 435 is available, suitable, economically viable and a deliverable site capable of delivering significant levels of housing and education growth as directed by Policy SCLP12.28 of the Suffolk Coastal Council.

6.4 It is our view that the process underpinning the SA is fundamentally flawed with the Council taking a close-minded approach. This is further evidenced by the Council failing to review up to date evidence despite it being provided during the previous consultation stage.

6.5 Site 435 should be reconsidered in light of the evidence presented in this report and as a result should be allocated within the Suffolk Coastal Local Plan to as to deliver housing and education growth at Saxmundham.

Attached documents

- Appendix 1 - Site Location Plan.pdf (309 KB)
- Appendix 4 Flooding & Drainage Report.pdf (681 KB)
- Appendix 2 - AECOM Technical Note.pdf (345 KB)
- Appendix 5 - Saxmundham_LVIA.pdf (3.7 MB)
- Suffolk Coastal Local Plan Regulation 19 Stage Consultation Site 435 Land North and East of the Manor House Saxmund Representations.pdf (426 KB)
- Appendix 3 - AECOM Letter_Redacted.pdf (134 KB)
## Environment Agency (Robson, Liam)

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Our previous comments have been adequately addressed. The policy can be further strengthened by referencing no deterioration in waterbody status and improvement objectives in this section. Reference should be made to the “no deterioration” objective of the Water Framework Directive (WFD) as this is a statutory obligation.

The section has correctly identified the main WFD objectives within the local plan. It could be further strengthened for the relevant River Basin Management Plan (RBMP 2016 baseline WFD for these waterbodies to be highlighted within the section to provide context.

As mentioned previously, it would also be useful to see the addition of WFD objectives in the Sustainability Appraisal Framework table.
Gladman Developments (Crosthwaite, Richard)

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| In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against all reasonable alternatives. The Local Plan Update should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against ‘all reasonable alternatives’. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council’s decision making, and scoring should be robust, justified and transparent. 

Gladman are concerned that the site selection process has not included a like-for-like analysis of the strategic sites that are available for potential allocation. The East of Ipswich is the most sustainable location in the District in terms of its location close to employment, facilities and services. Its position also offers significant opportunities towards supporting the case for infrastructure investment and should therefore form a fundamental element of the future strategy for growth from 2018 to 2036.

[please refer to attachment]

<p>| Attached documents | Gladman Developments Limited - Attachment.pdf (2.3 MB) |</p>
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Hallett, Margaret

18

Margaret Hallett

Sustainability Appraisal

The guidance notes re Legal compliance for the Suffolk Coastal Local plan state on page 2 under Sustainability Appraisal / Strategic Environmental Assessment – “The Local Planning Authority is required to undertake Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment, and to publish a Sustainability Appraisal Report when it publishes a Plan.” It continues that “Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental and economic factors”. I am unable to find any such appraisal for SCLP 12.61. The sole appraisal in Pettistree is for an employment site. The appraisals for housing in Wickham Market are for nine other sites none of which are identified in the SCDC local plan, so I consider that the local plan is not legally compliant and also unjustified as it does not consider the reasonable alternatives which were identified by the Sustainability Appraisal process.

Review the Sustainability Appraisals for housing development in Wickham Market parish and remove SCLP 12.61 from consideration.
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<td>I can not support this planning proposal, the reasons being displayed in paperwork provided. I do not agree farm land and green belt land should be used for building.</td>
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<td>Attached documents</td>
<td>Howe Mr &amp; Mrs J Attachment.pdf (179 KB)</td>
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# Leave the Layers Alone

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<td>Agent Organisation Name</td>
<td>Richard Buxton Environmental &amp; Public Law</td>
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1.1 ‘Leave The Layers Alone’ (“LTLA”) comprises a group of over 400 residents of Saxmundham and Benhall who object to the inclusion of South Saxmundham Garden Neighbourhood (“SSGN”) policy SCLP 12.29 in the Suffolk Coastal Final Draft Local Plan, January 2019. The 12.29 site is materially unsound on the basis that it has not been positively prepared nor is it justified, effective or consistent with national policy. (1 All references to documents and their internal page numbers shall be displayed as Documents/page e.g. SHELAA/17 to indicate page 17 of the SHELAA.)

1.2 LTLA’s supporting evidence includes:

- Appendix 1 – Inspector Clew’s letter to North Essex Authorities, 8 June 2018;
- Appendix 4 – Pigeon Capital Management 2 Ltd ‘Issues and Options Measured Area Plan’, 2017;
- Appendix 5 – Inspector Clew’s letter to North Essex Authorities, 2 August 2018;
- Appendix 6 – Landscaping Briefing Note, Michelle Bolger, 11 Sept 2018; Appendix 7 – Flooding and Drainage Report, GWP Consultants, Sept 2018; Appendix 8 – LTLA Foul Waste Drainage Survey, 8 Sept 2018;
- Appendix 10 – Interim Sustainability Appraisal, extracts, July 2018;
- Appendix 11 – LTLA First Draft Submission, extract on SA Scoring, 14 Sept 2018;
- Appendix 12 – Bidwells’ Submission on behalf of site 435 owner, 13 Sept 2018 (minus appendix).

1.3 LTLA made submissions on the ‘first draft Local Plan’ dated 14 September 2018. They expressed concern then, and remain concerned now, that there continues to be a systematic failure to do the ground work first i.e. undertake robust analysis of sites and only then consider the allocations and carry out the Sustainability Appraisal (“SA”) process on the basis of the detailed background reports. The consequence of this approach is that the SA scoring of the December 2018 SA report is neither reliable nor informed by SCDC’s
own internal evidence base. There continues to be top down land use planning. As a consequence, the SA report that purports to score the SSGN allocation does not withstand close scrutiny and the evidence base lacks the necessary demonstration of achievability and suitability. SCDC is creating the impression that sites are compatible with the growth policy for Saxmundham but on close examination the SSGN fails to deliver policy objectives for sustainable growth in the town.

1.4 The SA process is legally flawed as it has not been carried out objectively, and negative assumptions have been made about alternatives that are not supported by the evidence, and lead to an unreliable SA scoring process.

1.5 Of note is the lack of reasonable alternatives due to the inherent prejudice by SCDC against split sites for SSGN. Yet the inclusion of two split sites as “reasonable” alternatives to the SSGN policy means that SSGN is itself a “split” with employment land (site 716) across the busy A12.

1.6 It also appears that the December 2018 SA assessment of alternative option 1 has not meaningfully happened and the reason given for its exclusion is out of date, in direct contravention of NPPF 31 ‘Preparing and reviewing plans’ that the preparation and review of all policies should be “underpinned by relevant and up-to-date evidence” (see more on this at para 3.11-3.13). In this regard reference is made to paras 96-103 of the letter of Inspector Clews to North Essex Authorities (“NEA”), 8 June 2018 (Appendix 1). As SCDC will be aware from LTLA’s last consultation response, Inspector Clews did not recommend that the North Essex Authorities Local Plan was sound, in part due to the fact that the alternatives had not been objectively assessed. In fact in the NEA matter, the chosen spatial strategy (a Garden Community) was assessed against alternatives that did not include Garden Communities and so the Inspector found that “the authors of the SA report have generally made optimistic assumptions about the benefits of GCs, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions. As a result these assessments lack the necessary degree of objectivity and are therefore unreliable”.

1.7 Saxmundham Town Council raises similar objections which are set out in its submissions, and we understand LTLA’s 400+ campaigners echo the concerns of their professional consultants appended to this report.

1.8 All references to sites are based on those assigned in the Strategic Housing and Economic Land Availability Assessment (“SHELAA”) December 2018.

2. Matters and Issues

2.1 This section identifies the main matters and issues arising in connection with the SSGN allocation. LTLA have instructed a number of experts to assist and these are developed in the subsequent sections as referenced.

2.2 In summary:

- SSGN is the wrong vehicle for delivery of housing growth in Saxmundham and conflicts with the proposed town growth policy (SCLP 12.28) (sections 2.3-2.11);
- The proposed SSGN conflicts with Garden City Principles (sections 2.12-2.26);
- There are errors with the measurements of the allocation sites which raises questions regarding what is actually being appraised, and the knock-on effect with regards to important considerations like site viability (sections 2.27-2.35);
- SCLP 12.29 is not in fact “education led” despite representations it is (section 2.36) and
in any event the case for 800 dwellings to fund a new primary school is not supported by the evidence (section 2.37);  
• As presently formed SCLP 12.29 does not deliver 800 dwellings and there is serious doubt that SCLP 12.29 could deliver 800 dwellings and meet Garden City Principles (sections 2.38-2.43);  
• The viability assumptions are materially flawed, and there continues to be concerns for the viability of this scheme (sections 2.44-2.55);  
• The landscape assumptions are materially flawed, and there continues to be concern regarding the safeguarding of ‘The Layers’ (sections 2.56-2.60);  
• The drainage assumptions are materially flawed, and there continues to be drainage concerns in Saxmundham (sections 2.61-2.62);  
• The single-access serving the SSGN site does not meet highway safety standards (sections 2.63-2.67);  
• Safeguards to the heritage (e.g. Hurts Hall) are weak (sections 2.68-2.70);  
• There is no consideration of the major energy infrastructure in the District nor the impact upon the town or the proposed SSGN (section 2.71);  
• The SA is legally flawed and does not provide an objective assessment of reasonable alternatives (sections 3.1-3.34);  
• In conclusion the site allocation SCLP 12.29 does not withstand scrutiny and cannot be taken forward as it renders the final draft Local Plan unsound.

4. Conclusion

For the reasons above, LTLA objects to the 12.29 Site allocation on the basis it is not sound, that the scoring undertaken in the SA does not withstand scrutiny and has not been assessed objectively, and that the evidence base lacks the necessary demonstration of achievability and suitability. This current iteration of the Local Plan is in direct conflict with national policy namely NPPF para 67 in that SCDC have not identified a sufficient supply and mix of sites whilst correctly taking into account their availability, suitability and likely economic viability.

See attached documentation.

Attached documents:

App._7__Flooding__Drainage_ReportGWP_pt_2.pdf (2.5 MB)  
App._7__Flooding__Drainage_ReportGWP_pt_1.pdf (18.8 MB)  
App._11__LTLA_14_Sep_2018_extract_re_SA_Scoring.pdf (454 KB)  
App._10__Interim_Sustainability_Appraisal_extracts_July_2018.pdf (2.0 MB)  
App._3__BVA_Region19_Viability_Report_Compiled_Feb_2019.pdf (2.8 MB)  
App._4__Pigeon_Measured_Area_Plan_Issues_and_Options_2017_printed.pdf (1.8 MB)  
App._1__Inspector_Clews_letter_to_North_Essex_Authorities_8_June_2018.pdf (3.3 MB)  
App._6__Landscaping_Briefing_Note_Michelle_Bolger__11_Sep_2018.pdf (19.4 MB)  
App._5__Inspector_Clews_letter_to_North_Essex_Authorities.pdf (3.8 MB)  
App._8__LTLA_foul_waste_drainage_survey_8_Sep_2018.pdf (1.3 MB)  
Final_Draft_Local_Plan_Submissions.pdf (79 KB)  
App._12__Bidwels_Submission_13_Sep_2018_minus_appendix.pdf (1.1 MB)  
Mayhew, J E

Comment ID: 28

Organisation Name

First Name: J E

Surname: Mayhew

Agent Organisation Name

Agent First Name: Barbara

Agent Surname: Robinson

Comment:

Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page )

PLEASE let other affected residents know and question your local Councillors The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure'.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by this plan.

The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10' Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan are inadequately
and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) "serious adverse effects" have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

NPPF- 11. Conserving and enhancing the natural environment

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities' The SA does not appear to take account of the cumulative effect of CSs of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion.

THESE ASPECTS NEED TO BE FULLY ASSESSED IN ORDER FOR THE CS SA TO BE SOUND

1. DRAINAGE, Surface Water Drainage: APPEARS NON-COMPLIANT and may not work.
2. FLOODING LIKELIHOOD may increase at Westerfield.
3. SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems (eg recently at Rushmere)
4. TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS – no solutions
5. AIR POLLUTION and impact on our children’s health inadequate Air Pollution Action Planning
6. ADVERSE PRESSURES ON HOSPITALS, SCHOOLS & ACCESS TO GPs and SOCIAL CARE
7. ADVERSE EFFECTS OF ROAD WIDENING and REMOVAL OF TREES & VERGES
8. LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND
9. REMOVAL OF TREES, HEDGEROWS, HABITATS
10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

Mayhew, R T

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<td>Derk</td>
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<tr>
<td>Surname</td>
<td>Noske</td>
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Comment

I object to the Core Strategy Review Plan proposal for Land at Humber Doucy Lane, Rushmere St Andrew (SCLP12.24)

The proposal fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of development of the ‘Garden Suburb’, in combination with all the other cross boundary proposals of East Coast/Waveney, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure.

I suggest therefore the plans are unsound and do not comply with the national planning policy framework (NPPF)

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Meeting the challenge of climate change, flooding and coastal change. It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) “Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17).

The following issues need to be fully assessed & adequately addressed in order for the core strategy review to be ‘sound’.

1. DRAINAGE, Surface Water Drainage; appears non-compliant and may not work.
2. FLOODING LIKELIHOOD may increase at Westerfield.
3. SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems (e.g. recently at Rushmere).
4. TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS – particularly for Humber Doucy Lane and Tuddenham Road.
5. AIR POLLUTION and impact on our children’s health inadequate Air Pollution Action Planning.
6. ADVERSE PRESSURES ON HOSPITALS, SCHOOLS & ACCESS TO GPs and SOCIAL CARE.
7. ADVERSE EFFECTS OF ROAD WIDENING and REMOVAL OF TREES & VERGES.
8. LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND.
9. REMOVAL OF TREES, HEDGEROWS, HABITATS
10. ENCROACHMENT on green spaces and countryside, and effect on residents particularly the area around Tuddenham Lane
Noske, Elaine

Comment ID | 20
---|---
Organisation Name | 
First Name | Elaine
Surname | Noske
Agent Organisation Name | 
Agent First Name | 
Agent Surname | 
Comment | I am writing to object to the Core Strategy Review Plan proposal for Land at Humber Doucy Lane, Rushmere St Andrew (SCLP12.24)

The proposal fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of development of the ‘Garden Suburb’, in combination with all the other cross boundary proposals of East Coast /Waveney, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure. The plans are therefore unsound and do not comply with the national planning policy framework (NPPF).

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to NPPF 10. Meeting the challenge of climate change, flooding and coastal change. It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) “Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17).

The following issues need to be fully assessed & adequately addressed in order for the core strategy review to be ‘sound’.

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Attached documents
Pigeon Capital Management 2 Ltd & Trustees of Limes and Grange Farms

Comment ID 15

Organisation Name Pigeon Capital Management 2 Ltd & Trustees of Limes and Grange Farms

First Name
Surname

Agent Organisation Name Turley

Agent First Name Sophie

Agent Surname Pain

Comment

Representations to the Sustainability Appraisal

3.1 In line with good practice and UK Legislation a Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) must be carried out as part of the preparation of a new Local Plan which includes site allocation documents.

3.2 The role of an SA is to promote sustainable development by assessing the extent to which the emerging options, when judged against reasonable alternatives, will help to achieve relevant local environmental, economic and social objectives.

3.3 The SA process is an opportunity to consider if the proposals in the Plan are the most appropriate given the reasonable alternatives. The SA can be used to test the evidence underpinning the Plan and help to demonstrate how the tests of soundness have been met. It should be applied as an iterative process informing the development of the Local Plan to demonstrate that it complies with the National Planning Policy Framework (the Framework) and promotes sustainable development.

3.4 To demonstrate that the proposed allocation known as Land adjacent to Reeve Lodge, High Road, Trimley St Martin (“the Site”) constitutes sustainable development, it has been assessed by Suffolk Coastal District Council against the SA objectives of the Local Plan and subsequently allocated for a mix of uses as set out in Policy SCLP12.66 within the Final Draft Local Plan 2016-2036.

3.5 The SA notes that the spatial strategy will have many significant positive sustainability effects as a result of directing a significant quantum of growth to the sustainable settlements identified within Policy SCLP3.2 of the Final Draft Local Plan. Trimley St Martin has been identified as a Large Village within the settlement hierarchy and therefore considered suitable for growth. Trimley St Martin is recognised as having a primary school, village hall/community centre and convenience store as part of the mix of services and facilities present.

3.6 The SA has assessed the Site as a sustainable location for development with Table 3
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

(below) summarising the SA scoring of the Site which is replicated from Page 204 of the Final Draft SA Report. This scoring has resulted in the following summary of the Site’s sustainability performance with reference to ‘potential mitigation measures’ as identified by the Council:

3.7 ‘The requirements set out in Policy SCLP2.3 (Cross Boundary Mitigation of Effects on Protected Habitats) and Policy SCLP10.2 (Visitor Management of European Sites) will help to mitigate the impact of increased visitors on protected sites. The Environmental Quality policy, which highlights the need for developments to address impacts on soils, agricultural land and air quality will help mitigate the impacts on air quality and material assets. The requirements and standards set out in the Sustainable Construction policy will help mitigate the impact of development on emissions levels. The Design Quality policy requires adequate provision for the storage and collection of waste and recycling bins.’

3.8 To ensure that the Site is scored accurately, Turley Sustainability has reviewed the SA utilising the latest site specific technical evidence. In most cases we agree with the Council’s assessment of the Site’s performance against each of the SA Objectives. However there are certain areas where the technical evidence would suggest that the Site’s sustainability performance is in fact higher than the score currently assigned in the Council’s SA: These areas are as follows:

» SA Objective 7: Air Quality
» SA Objective 8: Soil and Mineral Resources
» SA Objective 10: Greenhouse Gas Emissions
» SA Objective 13: Biodiversity and Geodiversity
» SA Objective 19: Sustainable Travel and Access to Services

3.9 Appendix 1 provides the full list of headline objectives and decision making criteria which give additional detail on the methodology used to subjectively assess performance of the Site in accordance with the Council’s methodology.

3.10 The assessment utilises referenced technical information that was submitted in support of the Regulation 19 Representations to the Site, along with the professional expertise of Turley Sustainability.

SA Objective 7: Air Quality

3.11 Whilst development at the Site has the potential to increase traffic through the increase of residents, mitigation measures will be in place. The location of the Site will itself encourage both sustainable and active modes of travel. The Site is within walking and cycling distance of services and facilities within the village and the adjoining residential neighbourhood and the Site is served by an existing bus service along High Road, where buses run every 15 minutes between Ipswich and Felixstowe Monday to Saturday and every 30 minutes on a Sunday. As such, these measures provide tangible alternatives to the use of a private car and subsequent impact on air quality.

3.12 The site is thus scored as having a neutral effect on this SA objective.

SA Objective 8: Soil and Mineral Resources

3.13 Whilst it is acknowledged that the development will impact soils and agricultural land across the site, requirements within the Environmental Quality policy of the Suffolk Coastal District Council Final Local Plan (December 2018) will help to mitigate the
impacts of the development.

3.14 As there will be mitigation in place in line with local policy, and as it is acknowledged that soil and mineral resources will be affected district wide in order to meet the clear housing demand, the site is thus scored as having only a minor negative effect on this SA objective.

**SA Objective 10: Greenhouse Gas Emissions**

3.15 Although the SA concludes that overall emissions across the whole district could rise as a result of development, the energy consumption per capita should reduce as a result of compliance with Building Regulations. Improved u-values and system efficiencies will help to reduce dependency on non-renewable sources and improve overall energy efficiency of new buildings.

3.16 Draft Policy SCLP9.2: Sustainable Construction of the Suffolk Coastal District Council identifies the need for developments of 10 or more dwellings to reduce CO2 emissions below the Target CO2 Emission Rate, with on-site renewable energy generation encouraged.

3.17 Opportunities for the implementation of renewable energies will be explored during design development but it is likely that some provision for renewable or low carbon technologies will be made.

3.18 It can thus be assumed that the development will have a neutral effect on this SA objective.

**SA Objective 13: Biodiversity and Geodiversity**

3.19 An ecological assessment was undertaken by Hopkins Ecology in August 2018 to support the Regulation 18 Representations to the Site. The assessment identified that there are no wildlife designations on the site, and as an existing agricultural field, it contains little ecological value. A single tree presents potential for roosting bats and nesting birds. It is proposed to be retained within an area of green space, thereby protecting and enhancing this potential habitat.

3.20 The Concept Masterplan is landscape-led with a variety of open spaces and green infrastructure within the Site, providing links to the countryside via existing Public Rights of Way routes. Indigenous planting in new landscaped areas will deliver a net gain in biodiversity, in line with Draft Policy SCLP10.1: Biodiversity and Geodiversity.

3.21 In this context the development is considered to have a positive effect with regard to the objective.

**SA Objective 19: Sustainable Travel and Access to Services**

3.22 A preliminary Transport Assessment was undertaken by TPA in 2018 to support the Regulation 18 Representations to the Site. The conclusions of the Assessment supported the outcome of Draft Policy SCLP3.2 Settlement Hierarchy that the site is in a sustainable location with access to a wide range of services, amenities and employment opportunities. Table 1 indicates the proximity of the site to nearby key services.

Table 1: Distance to Services and Facilities [see attachment]
3.23 The Site is well connected to the existing footpath and cycle network, providing access to places of employment, services and facilities together with the railway station and bus stop. The culmination of these services in close proximity, means the development will reduce the need of new residents to travel by private car.

3.24 The Site is thus scored as having a major positive effect on this SA objective.

Summary

3.25 The assessment of the sustainability performance of the Site has been undertaken utilising the technical evidence which has been prepared in support of the Site.

3.26 Based upon the current technical evidence, the assessment has identified the proposed scheme for the Site has additional sustainability benefits than those initially considered/assessed by Suffolk Coastal District Council. A comparison of the assessment is provided in Table 3 below.

Table 2: SA Key [see attachment]

3.27 In conclusion, Land at Reeve Lodge remains a suitable and sustainable location for mixed-use allocation that is in full accordance with the approved spatial strategy. The Settlement Hierarchy in Policy SCLP3.2 identifies Trimley St Martin as a location with access to a mix of key services and facilities and is therefore suitable for new housing. The site at Land adjacent to Reeve Lodge has performed well against each of the Sustainability Appraisal Objectives, with the information provided above further demonstrating its sustainability and suitability as a mixed-use allocation.

Attached documents

Pigeon & Limes & Grange Farms (Turley) SA Attachment.pdf (654 KB)
3.1 In line with good practice and UK Legislation a Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) must be carried out as part of the preparation of a new Local Plan which includes site allocation documents.

3.2 The role of an SA is to promote sustainable development by assessing the extent to which the emerging options, when judged against reasonable alternatives, will help to achieve relevant local environmental, economic and social objectives.

3.3 The SA process is an opportunity to consider if the proposals in the Plan are the most appropriate given the reasonable alternatives. The SA can be used to test the evidence underpinning the Plan and help to demonstrate how the tests of soundness have been met. It should be applied as an iterative process informing the development of the Local Plan to demonstrate that it complies with the National Planning Policy Framework (Framework) and promotes sustainable development.

3.4 To demonstrate that South Saxmundham Garden Neighbourhood constitutes sustainable development, it has been assessed by Suffolk Coastal District Council against the SA objectives of the Local Plan and subsequently allocated for residential development as Policy 12.29 within the Final Draft Local Plan.

3.5 The SA notes that the spatial strategy will have many significant positive sustainability effects as a result of directing a significant quantum of growth to Saxmundham which has been identified as a sustainable settlement within Policy SCLP3.2 of the Draft Plan. This policy identifies Saxmundham as a ‘Market Town’, the second highest category following ‘Major Centre.’ Policy SCLP3.1 indicates that the largest levels of growth will be concentrated in Major Centres and Market Towns such as Saxmundham, as this will ensure the creation of sustainable rural communities.

3.6 The SA has assessed South Saxmundham Garden Neighbourhood as a sustainable location for residential development with Table 2 (below) summarising the SA scoring of the Site which is replicated from Page 202 of the Final Draft SA Report. This scoring has resulted in the following summary of the sustainability performance of the site with
reference to ‘potential mitigation measures’ as identified by the Council:

‘The loss of greenfield agricultural land is hard to mitigate in a district with limited brownfield land available, however requirements within the Landscape Character policy, Biodiversity and Geodiversity policy, and the Environmental Quality policy (in addition to the specific requirements already set out in this policy) will help mitigate the impact of the development. The requirements of the Environmental Quality policy will also help mitigate the impact on air quality. The requirements and standards set out in the Sustainable Construction policy will help mitigate the impact of development on emissions levels. The Design Quality policy requires adequate provision for the storage and collection of waste and recycling bins.’

3.7 To ensure that the Site is scored accurately, Turley Sustainability has reviewed the SA utilising the latest site specific technical evidence. In most cases we agree with the Council’s assessment of the Site’s performance against each of the SA Objectives.

However there are certain areas where the technical evidence would suggest that the Site’s sustainability performance is in fact higher that the score currently assigned in the Council’s SA: These areas are as follows:

> SA Objective 8: Soil and Mineral Resources
> SA Objective 10: Greenhouse Gas Emissions
> SA Objective 13: Biodiversity and Geodiversity

3.8 Appendix 2 provides the full list of headline objectives and decision making criteria which give additional detail on the methodology used to subjectively assess performance of the site in accordance with the Council’s methodology. These criteria have been used to reappraise the site as presented below.

SA Objective 8: Soil and Mineral Resources

3.9 Whilst it is acknowledged that the development will result in the loss of greenfield agricultural land across the site, requirements within the Landscape Character policy, Biodiversity and Geodiversity policy and the Environmental Quality policy of the Suffolk Coastal District Council Final Local Plan (December 2018) will help to mitigate the impacts of the development.

3.10 As there will be mitigation in place in line with local policy, and as it is acknowledged that soil and mineral resources will be affected District wide in order to meet the clear housing demand, the site is thus scored as having only a minor negative effect on this SA objective.

SA Objective 10: Greenhouse Gas Emissions

3.11 Though the Council’s SA concludes that overall emissions across the whole District could rise as a result of increase in development, the energy consumption per capita should reduce as a result of compliance with Building Regulations. Improved u-values and system efficiencies will help to reduce dependency on non-renewable sources and improve overall energy efficiency of new buildings.

3.12 Policy SCLP9.2: Sustainable Construction of the Suffolk Coastal District Council Final Local Plan (December 2018) identifies the need for developments of 10 or more dwellings to reduce CO2 emissions below the Target CO2 Emission Rate, with on-site
renewable energy generation encouraged.

3.13 Opportunities for the implementation of renewable energies will be explored during design development but it is likely that some provision for renewable or low carbon technologies will be made.

3.14 It can thus be assumed that the development will have a neutral effect on this SA objective.

SA Objective 13: Biodiversity and Geodiversity

3.15 An ecological assessment has been undertaken by Hopkins Ecology, establishing that there are no wildlife designations on site and the use of the site as arable farmland means that much of the existing habitat is of low or negligible ecological value.

3.16 The surveys indicate that habitats present include largely arable cropland, deciduous woodland, two ponds, scrub and improved grassland. As such, species scoped into the ecological assessment are great crested newts and reptiles, roosting bats may also be present on site. Mitigation measures proposed include retaining existing features including hedgerows and woodland with new areas of greenspace buffering these development areas; these features will enhance connectivity between existing green spaces for wildlife and aims to deliver a net gain in biodiversity, in line with thrust of Policy SCLP10/1: Biodiversity and Geodiversity from the Suffolk Coastal District Council Final Local Plan (December 2018).

3.17 In this context the development is considered to have a positive effect with regard to the objective.

Summary

3.18 The assessment of the sustainability performance of South Saxmundham Garden Neighbourhood has been undertaken utilising the current technical evidence.

3.19 Table 2 below summarises the sustainability performance of South Saxmundham Garden Neighbourhood. As noted, an appraisal detailing the full sustainability objectives and how the site has scored against each of these is provided in Appendix 2.

3.20 Based upon the current technical evidence, the assessment has identified the proposed development at South Saxmundham Garden Neighbourhood as having enhanced sustainability benefits than that initially considered/assessed by Suffolk Coastal District Council.

Table 1: SA Key (SEE ATTACHMENT)
Table 2: SA Performance Summary (SEE ATTACHMENT)

3.21 In conclusion, South Saxmundham Garden Neighbourhood remains a suitable and sustainable location for development. The Settlement Hierarchy in Policy SCLP3.2 identifies Saxmundham as a Market Town, suitable for sustainable development with access to a good level of services and facilities. The site at South Saxmundham Garden Neighbourhood has performed well against each of the Sustainability Appraisal Objectives, with the above information, supporting the site assessment and further demonstrating its sustainability and suitability for allocation as a reasonable alternative.
for a mixed-use development.

| Attached documents | Sustainability Appraisal Attachment.pdf (379 KB) |
Pledger, Brenda

Comment ID: 30

Organisation Name: 
First Name: Brenda
Surname: Pledger

Agent Organisation Name: 
Agent First Name: Barbara
Agent Surname: Robinson

Comment:

Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith. This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page)

PLEASE let other affected residents know and question your local Councillors. The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by this plan.

The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10' Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan are inadequately
and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) "serious adverse effects" have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

**NPPF- 11. Conserving and enhancing the natural environment**

**TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS**

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities' The SA does not appear to take account of the cumulative effect of CSs of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion.

**THESE ASPECTS NEED TO BE FULLY ASSESSED IN ORDER FOR THE CS SA TO BE SOUND**

1. **DRAINAGE, Surface Water Drainage:** APPEARS NON-COMPLIANT and may not work.
2. **FLOODING LIKELIHOOD** may increase at Westerfield.
3. **SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems** (eg recently at Rushmere)
4. **TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS** – no solutions
5. **AIR POLLUTION** and impact on our children’s health inadequate Air Pollution Action Planning
6. **ADVERSE PRESSURES ON HOSPITALS, SCHOOLS & ACCESS TO GPs and SOCIAL CARE**
7. **ADVERSE EFFECTS OF ROAD WIDENING and REMOVAL OF TREES & VERGES**
8. **LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND**
9. **REMOVAL OF TREES, HEDGEROWS, HABITATS**
10. **COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later**
11. **Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?**

Do not agree with planning policy.

Attached documents
The concept of sustainability is a difficult one for the lay person to understand without recourse to training in the language of planning. Assuming planning law is consistent throughout England, I have taken a definition of 'Sustainability' from Liverpool City Council’s website:


They state sustainability is:

"Sustainability means generating a better quality of life, Whilst improving local environmental conditions for local people and future generations. For the council, this means always challenging the way things are done and providing leadership for the whole community."

Referring to

**SCLP12.35 – LAND AT INNOCENCE FARM**

I struggle to understand how the development of Innocence Farm into a Lorry Depot will improve the quality of life for the residents of Trimley St. Martin and Kirton. The development is predicated on sustained growth emanating primarily from the Port of Felixstowe and draws upon the Lichfield Port Needs Study which has one solitary mention of Brexit and doesn’t factor in the deep uncertainty surrounding this chaotic national decision. At the current time of writing Businesses appear to be fleeing the U.K. The infrastructure required to support development will be immensely costly and unrealistic in a time of limited financial growth. S.C.D.C - shortly to be merged with Waveney D.C. to form East Suffolk D.C. proposes and supposes:

- Growth of the Port of Felixstowe
- Additional jobs arising from BT and the Adastral Business Park
- The needs of Sizewell C
- The growth of small / medium-size new businesses in the area
Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

This appears spurious.

I also consider a development on the Eastern side of the Orwell Bridge to be counterproductive in terms of improving the quality of life for the people of the Colneis Peninsula. There is only one way in and out of the Peninsula and when the Bridge is closed for whatever reason, the impact on Ipswich, both for people and businesses is disastrous and doesn't improve anyone's quality of life nor will it benefit future generations.

On these grounds alone, I view the development of Innocence Farm as being a poor decision.
Robinson, Barbara

Comment ID 25

Organisation Name

First Name Barbara

Surname Robinson

Agent Organisation Name

Agent First Name

Agent Surname

Comment

THE FOLLOWING ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

I SUGGEST THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to;

NPPF 10. Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

“Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes.

This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

NPPF-11 Conserving and enhancing the natural environment is not adequately taken into account.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of Cs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY
ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a “sustainable future” for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

1. DRAINAGE, Surface Water Drainage; APPEARS NON-COMPLIANT and may not work.
2. FLOODING LIKELIHOOD may increase at Westerfield.
3. SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems (eg recently at Rushmere)
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10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS

The national planning policy framework TESTS OF SOUNDNESS - NOT MET

suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT

I suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

Ipswich is failing to address air pollution and it’s AQ Action Plan is inadequate. These
**SCDC proposals will exacerbate this critical problem.**

(SEE ATTACHMENT FOR MAPS)

**General Comment**

As a resident of both Tuddenham, North Ipswich and Westerfield, I am appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Policies over recent years. I have have no confidence in their competence., nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURRENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.

Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

_Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for judicial review” PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018’_

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-undemocratic-planning- system-1-5477176?fbclid=IwAR2OZbd7Jwk6LOM_wPHuVqVq13cyk_48Lly-CpPStVQWly3yKKNjab7SH0

In effect SCDC have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

Our recent parish council meeting had the same findings;

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved-DRAFT-final.pdf

**Policy SCLP 12.24 Land at Humber Doucy Lane**

_It was agreed to make representations on the basis of both Soundness & Legality –_

- **It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).**
- **It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.**
- **The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25 th March 2019.**

**Specific Comments on SCLP12.24**
The public notices issued by IBC and SCDC are in the wrong locations for this area and are therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

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The area in question SCLP12.24 is part of the designated Green Rim and Green Corridor for Ipswich under current plan. It should remain so as there is a deficit of Green space in North and East Ipswich historically already identified in IBC Biodiversity and Open Space Policy Document.

This proposal is unsound as it takes no account of the established Biodiversity and Open Space BC Policy.

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**These development proposals by both SCDC and IBC**

will adversely impact on the sensitivity of the Fynn Valley and the need to address light Pollution and ancient heritage.

Post Brexit food security will be an issue with the need to protect “Best and Most Versatile” Grade 2 farming Land.

This area proposal will lead to the coalescence of Westerfield, Tuddenham and Ipswich.

The delays and continuing viability issues of the Ipswich Garden Suburb persist which will impact on this proposal too. Therefore, this land area proposal is both unnecessary and premature.

The road infrastructure is characterised as ‘rat runs’ unclassified roads or narrow roads with passing places.

There is no mention of the Felixstowe Freight line planned increase and the adverse impact this will have on passenger rail services and transport mitigation.
The Plan go against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies;

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SP15 Landscape and Townscape
DM21 – Aesthetics

Like the North Fringe Protection Group, we also share their concerns, outlined here. We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road:

1. The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018 Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at
the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc.

3. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.

4. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim”.

5. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim.

6. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.

7. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. The Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL

REPORT Strategic Environmental Assessment and Sustainability Appraisal JANUARY 2019

In our opinion it is too early to comment on the Sustainability Appraisal (SA) Report for several reasons, including:

No SA of IBCs decision not to comply with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
No SA of IBC’s non-adherence to Government Guidelines for IBC’s Air Quality Action Plan and the lack of a target to reduce air pollution in the AQAP and in the CS itself.
No traffic modelling assessment without TUOC for the IGS development and whether the delivery of the IGS is sustainable.
No sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required construction works.
No air quality modelling/assessment of the CS for road traffic.
No air quality or noise assessment in relation to rail transport. This is a major gap in the evidence base that risks rendering the CS unsound. AQ assessments are required for; the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollution clouds, additional freight to and from Port of Felixstowe, and additional freight in relation to the construction of Sizewell C.

The apparent lack of a full appraisal of the impacts on building on land at Humber
Doucy Lane in the north east.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. We reserve the right to comment on the SA as it is developed.

Attached documents

Robinson_Barbara.pdf (690 KB)
Save Our Country Spaces (Robinson, B)

THE FOLLOWING ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

NB SOCS wish to give oral evidence at Inspection.

WE SUGGEST THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to; NPPF 10. Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

“Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes.

This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

NPPF-11 Conserving and enhancing the natural environment is not adequately taken into account.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially
transport/traffic and increased air pollution and traffic congestion.

THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a “sustainable future” for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

1. DRAINAGE, Surface Water Drainage; APPEARS NON-COMPLIANT and may not work.
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10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS

The national planning policy framework TESTS of SOUNDNESS suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT

Save Our Country Space, (SOCS) suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

Ipswich is failing to address air pollution and it’s A Q Action Plan is inadequate. These SCDC proposals will exacerbate this critical problem.
(See map attached)

**General Comment**

As a residents of both Tuddenham, North Ipswich and Westerfield, SOCS are appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Policies over recent years. SOCS have have no confidence in their competence, nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURRENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.

Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for judicial review”

PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018’

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-undemocratic-planning-system-1-5477176?fbclid=IwAR2OZbd7Jwk6ILOM_wPHuVVqy3cyk_48Lly-CpP5tVQWyly9yKNjab7SH0

In effect SCDC have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

SOCS are stakeholders and SCDC failed to advise of of this consultation failing the Statement of Community involvement.

Our recent parish council meeting had the same findings;

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved-DRAFT-final.pdf

Policy SCLP 12.24 Land at Humber Doucy Lane

It was agreed to make representations on the basis of both Soundness & Legality –

- It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).
- It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.
- The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council
would fully discuss this at the next meeting prior to replying by the deadline date of 25th March 2019.

**Specific Comments on SCLP12.24**

The public notices issued by IBC and SCDC are in the wrong locations for this area and are therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

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Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

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Comments received on the Sustainability Appraisal Report of the Suffolk Coastal Final Draft Local Plan

Smith, T M

- Comment ID: 26
- Organisation Name: T M
- First Name: T M
- Surname: Smith
- Agent Organisation Name: Barbara
- Agent First Name: Barbara
- Agent Surname: Robinson
- Comment: SCLP12.24

Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith. This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page.)

PLEASE let other affected residents know and question your local Councillors. The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure'.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health. The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by this plan.

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THESE ASPECTS NEED TO BE FULLY ASSESSED IN ORDER FOR THE CS SA TO BE SOUND

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10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?

I do not agree with the planning policy and all of the 1–11 aspect need to be studied before any decision is reached.
## Sward, S D

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<td>Comment</td>
<td>I cannot support the proposal for planning on green belt land along Humber Doucy Lane and beyond. This is prime agricultural land and green belt it will destroy the countryside for all the reasons given in the enclosed paperwork. This land is the start of the Fyn Valley which is a natural beautiful valley and much loved.</td>
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