East Suffolk Council.  Examination of the Suffolk Coastal Local Plan

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INSPECTOR’S INITIAL MATTERS, ISSUES AND QUESTIONS

Following my initial reading of the Suffolk Coastal Local Plan (the Plan) (Final Draft Plan January 2019), the supporting evidence and the representations, I have identified the matters and issues and have posed the key questions for the examination. These are set out in this document.

Please read and be familiar with the accompanying Inspectors Guidance Note which sets out important details of the organisation and conduct of the Examination and the hearings, and regarding the preparation of hearing statements. I shall assume that the Guidance Note has been read by participants at the Hearings.

It may be that some of the questions set out in this document will be answered in written statements. Consequently, I will not need to consider them further at the Hearings as I would have sufficient information. The scope of specific hearing sessions will be confirmed in the agendas published on the Examination website. It is important to note that written representations and oral representations carry the same weight, and I will have equal regard to views put at a hearing or in writing.

Any reply to my questions should be in accordance with the guidelines set out in my Guidance Note and should be sent to the Programme Officer by 4.00 pm on Friday 2 August 2019.
Matter 1: Procedural/legal requirements

Issue: Whether all Statutory and Regulatory requirements have been met?

Duty to Cooperate

1.1 Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the Planning and Compulsory Purchase Act 2004, as amended [the 2004 Act]?

Sustainability Appraisal

1.2 Is the Sustainability Appraisal (SA) adequate?
1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?
1.4 Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

Habitats Regulations Assessment

1.5 Has the Habitats Regulations Assessment (HRA) been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017?
1.6 Has the HRA screened all the proposed allocations and considered potential in-combination effects? If so, where are the results of this set out?

Local Development Scheme

1.7 Is the Plan compliant with the Council’s Local Development Scheme in terms of its form, scope and timing?

Community Involvement

1.8 Has the Council complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

Climate Change

1.9 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?
Matter 2: The Suffolk Coastal Spatial Strategy

A Housing Provision

**Issue: Is the overall strategy and provision for housing development effective and justified?**

*Calculating the housing need*

2.1 The PPG specifically advises that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes (Paragraph: 005 Reference ID: 2a-005-20190220). The Council’s response to my initial questions, calculates the figure of 542 homes per annum needed on this basis, using the latest published affordability ratio. Is this figure justified as the minimum number of homes needed in the Plan area on an annualised basis?

2.2 What implications (direct and consequential) for the Plan would arise from the use of a housing need figure derived using the 2014 based household projections?

2.3 The Plan seeks to provide for a contingency above the minimum housing need requirement. What is the overall provision for contingency (including the windfall allowance and contributions from Neighbourhood Plans) proposed and is it justified?

*Scale and location of growth*

2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

*Housing needs*

2.5 Does the Plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework?

*The supply of housing and housing trajectory*

2.6 Will there be a five year supply of deliverable housing sites on adoption of the Plan?

2.7 Given historic levels of housing completions in the Plan area, are numbers of units to be built envisaged per annum realistic and achievable?

2.8 Is the rate of delivery envisaged for the proposed allocations as set out in the trajectory realistic and justified?
2.9 The housing trajectory assumes provision of 50 dwellings per annum by way of windfalls. What is the justification for this figure and is it realistic for the duration of the plan period?

**Matter 2: The Suffolk Coastal Spatial Strategy**

**B Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers**

*Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers?*

2.10 Having regard to the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (D17) has the need for additional pitches, plots and moorings been robustly calculated?

2.11 Having regard to the ANA and the Councils response to my initial questions, should the Plan set targets for the provision of pitches, plots and/or moorings? What is the present position in respect of the planning status of the unauthorised 'New Traveller’ sites which are indicated to be a significant component of the identified need in the Councils response to my initial questions?

2.12 To be positively prepared, is it necessary for the Plan to make provision for the identified need for additional pitches and/or plots through a site allocation(s)?

2.13 How would the needs of the wider community who reside in caravans including people who are no longer classified as gypsies, travellers or travelling showpeople be identified and addressed by the Plan?

2.14 Is there sufficient capacity within the identified areas shown on the Policies Map (Policy SCLP5.15) to meet the identified need for additional moorings?

2.15 Will a five year supply of specific developable sites for gypsies, travellers, travelling showpeople and boat dwellers be provided on adoption of the plan together with a supply of specific, developable sites for years 6 to 10? How would any shortfall be addressed?

2.16 Is Policy SCLP5.17 justified and consistent with National Policy?
Matter 2: The Suffolk Coastal Spatial Strategy

C Distribution of Growth and the Settlement Hierarchy

Issue: Whether the Plan sets out a clear strategy for the pattern of development consistent with national policy?

2.17 Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?

2.18 Is the identification of settlements as set out in the Settlement Hierarchy in Policy SCLP3.2 justified?

2.19 Is the distribution of housing development as set out in table 3.5 justified and is it consistent with national policy for the achievement of sustainable development?

2.20 Would the Plan as drafted be sufficiently flexible to adapt to rapid change as set out in paragraph 11 of the Framework and would the definition of Settlement Boundaries through Policy SCLP3.3 be effective in meeting the objectively assessed needs for housing and other uses?

Table 3.1 Strategic Policies

2.21 Is the identification of strategic policies in Table 3.1 consistent with national policy as set out in paragraphs 20 to 30 of the Framework?

Matter 2: The Suffolk Coastal Spatial Strategy

D Economy

Issue: Is the overall strategy and provision for employment development effective and justified?

2.22 Is the proposed provision of land for new employment development ‘significantly above’ the baseline employment land requirement justified and is it consistent with national policy?

2.23 Has the assessment of the baseline employment land requirement taken into account any losses of existing employment land through redevelopment/change of use or allocations for other uses?

Economy Policies

2.24 Are Policies SCLP4.1, SCLP4.2 and SCLP4.3 consistent with national policy for ensuring the vitality of town centres as set out in paragraphs 85 and 86 of the Framework and would they be effective in regards to the sequential approach to the location of Use Class B1 offices (a main town centre use)?

2.25 Are Policies SCLP4.2 and SCLP4.3 positively prepared and would they be effective by requiring development not to have ‘adverse impacts on’ or ‘no harm to’...?

Policy SCLP4.5: Economic Development in Rural Areas

2.26 Is criterion c) consistent with national policy for the natural and historic environments in stating ‘no adverse impact and no harm’. Is the Policy positively prepared and would it be effective?

2.27 Is the requirement for a proposal to deliver additional community, cultural or tourism benefits justified and consistent with national policy for planning conditions and obligations as set out in paragraphs 54-57 of the Framework?

Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use

2.28 Is criterion b) clear, effective in terms of highway safety or consistent with paragraph 109 of the Framework?

Policy SCLP4.8: New Retail and Commercial Leisure Development

2.29 What is the justification for the definition of ‘edge of centre’ being within 300 metres of a Primary Shopping Area or Town Centre?

2.30 To be consistent with national policy as set out in paragraph 87 of the Framework, should the criteria a) to c) apply to edge of centre sites?

Policy SCLP4.9: Development in Town Centres

2.31 Is the Policy clear and unambiguous as to how proposals for ground floor non A1 uses would be dealt with in Primary Shopping Frontages and would it be effective?

E Major Energy Infrastructure

Issue: Are the strategic policies for Major Energy effective and justified?

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects.

2.32 Given the process for the consenting of Nationally Significant Infrastructure Projects (NSIP) and the designated National Policy
Statements, would the Policy as worded be effective? Is the distinction between projects which may be determined locally and those nationally, sufficiently clear?

2.33 Is criterion b) consistent with national policy as set out in paragraphs 55 and 56 of the Framework and the Community Infrastructure Regulations and is it positively prepared?

2.34 Is criterion i) seeking local positive outcomes justified in the context of NSIP projects where National Policy Statements apply?

F Infrastructure

Issue: Does the Plan make sufficient provision for infrastructure?

Policy SCLP2.2: Strategic Infrastructure Priorities

2.35 Would the policy be effective in dealing with cross boundary strategic infrastructure issues? Does the policy serve a clear purpose in seeking to support and enable infrastructure provision outside of the plan area and is it justified?

2.36 Is criterion j) consistent with national policy as set out in paragraph 170 of the Framework in regard to net gains in biodiversity?

Policy SCLP2.3: Cross Boundary Mitigation Effects on Protected Habitats

2.37 Does the Policy serve a clear purpose?

Policy SCLP3.5: Infrastructure Provision

2.38 Is the second paragraph of the Policy clear and consistent with paragraphs 54 to 56 of the Framework and the legal tests set out in the CIL Regulations and would it be effective?

2.39 Is it intended that development follows the principles of Holistic Water Management as the policy as drafted is unclear in this regard? If so, is this justified?
Matter 3: Area Specific Strategies - Development Allocations

Issue: Are the proposed Area Specific Strategies, allocations and policies justified, effective and consistent with national policy?

General Questions relevant to all proposed site allocations

- Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?
- Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

Policy SCLP12.1: Neighbourhood Plans

3.1 What is the justification for the indicative minimum dwelling figures set out in Policy SCLP12.1?

3.2 Would the policy be effective in bringing development forward in Leiston? What is the present planning status of the consented sites in Leiston allocated in the Neighbourhood Plan SA1, SA3, SA4?

Felixstowe

Policy SCLP12.2: Strategy for Felixstowe

3.3 Would the strategy be effective in addressing the potential impacts of development on the transport networks in and around Felixstowe consistent with the policies of the Framework?

Policy SCLP12.3: North Felixstowe Garden Neighbourhood

3.4 What is the justification for the threshold of ‘up to 2000 dwellings’?

3.5 Would the Policy be effective in achieving the comprehensive development of the allocated area and integrating the development with the existing community of Felixstowe?

3.6 Would the Policy be effective in achieving the provision of education facilities?

3.7 In terms of vehicular access, is the proposed Garden Neighbourhood deliverable or developable?

3.8 Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the scheme?

3.9 Would the Policy be effective in conserving the significance of designated Heritage Assets?
Would the policy be effective in mitigating any potential significant effects on the Deben Estuary SPA?

Would the proposed allocation safeguard the character and appearance of North Felixstowe?

Should the Master Plan be informed by the landscape character of the Suffolk Coast and Heaths AONB?

**Policy SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe**

Would the policy be effective in conserving and enhancing the landscape and scenic beauty of the Suffolk Coast and Heaths AONB?

**Policy SCLP12.5: Land at Brackenbury Sports Centre**

Would the Policy be effective in conserving the significance of the Grade II listed Tyndale House?

Is the Policy justified and consistent with paragraph 97 of the Framework which states that existing open space, sports and recreational buildings should not be built on except in specified circumstances?

**Policy SCLP12.7: Port of Felixstowe**

Is it justified that all development proposals at the site should be subject to Habitats Regulations Assessment Screening given that some forms of development may not be capable of affecting the designated interest features of European Sites?

**Policy SCLP12.8: Land at Bridge Road, Felixstowe**

Should part e) of the Policy be split into 2 parts to be effective?

**Policy SCLP12.9: Land at Carr Road/Langer Road, Felixstowe**

Given the proximity of the Felixstowe Water Recycling Centre, is the Policy consistent with paragraph 182 of the Framework and would it enable new development to integrate effectively with the existing water recycling facilities?

**Policy SCLP12.14: Spa Pavilion to Manor End**

Would the Policy be effective in sustaining and enhancing the significance of the Conservation Area and is it consistent with national policy in this regard?
Policy SCLP12.16: Felixstowe Leisure Centre

3.20 Is the Policy consistent with paragraph 97 of the Framework which states that existing open space, sports and recreational buildings should not be built on except in specified circumstances?

3.21 Are criteria b) and i) which relate to the town centre and residential accommodation respectively clear as to how a decision maker should react to development proposals?

3.22 Would the Policy be effective in sustaining and enhancing the significance of the Conservation Area and is it consistent with national policy in this regard?

Communities Surrounding Ipswich

Policy SCLP12.18: Strategy for Communities Surrounding Ipswich

3.23 Would the strategy be effective in addressing the potential impacts of development on the transport networks consistent with the policies of the Framework?

Policy SCLP12.19: Brightwell Lakes

3.24 Would the Policy be effective in conserving the significance of the Scheduled Monuments within and close to the site?

Policy SCLP12.21: Ransomes, Nacton Heath

3.25 Is the proposed allocation consistent with paragraph 172 of the Framework? Where is the evidence that the proposed allocation has regard for the purpose of conserving and enhancing the natural beauty of the AONB?

Policy SCLP12.22: Recreation and Open Space in Rushmere

3.26 Is the identification of recreation and open space land under Policy SCLP12.22 justified?

Policy SCLP12.24: Land at Humber Doucy Lane

3.27 What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?

Policy SCLP12.25: Suffolk Police HQ, Portal Avenue, Martlesham

3.28 Is Policy SCLP12.25 consistent with the policies of the Martlesham Neighbourhood Plan?
3.29 Are there any factors which would mean that the site is not ‘deliverable’ or ‘developable’ as per the definitions in the Framework?

3.30 Is the loss of office floorspace justified in the context of the overall supply of employment land?

3.31 Is the Policy consistent with national policy in respect of open space and recreation as set out in paragraphs 96 – 97 of the Framework and is it justified?

3.32 Would the Policy be effective in conserving the significance of designated Heritage Assets?

**Aldeburgh**

**Policy SCLP12.27: Land rear of Rose Hill, Saxmundham Road, Aldeburgh**

3.33 Where is the evidence that Policy SCLP12.27 has been subject to Habitats Regulations Assessment screening?

**Saxmundham**

**Policy SCLP12.28: Strategy for Saxmundham**

3.34 Is the ‘and’ at the end of point e) necessary to make the Policy effective?

**Policy SCLP12.29: South Saxmundham Garden Neighbourhood**

3.35 Is the allocation of land for approximately 800 dwellings achievable within the area indicated for housing between the A12 road and railway line on the indicative draft masterplan?

3.36 Is the indication of the area to the east of the A12 road for mixed use development justified given it would be used to provide open space?

3.37 In the context of Policy SCLP3.3: Settlement Boundaries, is the definition of the settlement boundary to include land which would be solely used for informal/open space justified? Why is the proposed employment land outside of the settlement boundary?

3.38 Would the provision of the SANG to the east of the railway be effective given the limited crossing points of the railway? Is the extent of land indicated for informal/formal open space to the east of the railway justified?
3.39 Would the Policy give rise to coalescence with Benhall village?

3.40 Would the Policy be effective in achieving the provision of required education facilities? Is it justified to include early years provision within both criteria a) and b)?

3.41 Are there any factors which would mean that the site is not ‘deliverable’ or ‘developable’ as per the definitions in the Framework?

3.42 Is it justified that the site is accessed via a single vehicular access?

3.43 Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the development?

**Woodbridge**

**Policy SCLP12.32: Former Council Offices, Melton Hill**

3.44 Would the Policy be effective in conserving the significance of designated Heritage Assets?

**Policy SCLP12.33: Land at Woodbridge Town Football Club**

3.45 Is paragraph 12.350 consistent with Policy SCLP12.33 in that it refers to the relocated facilities being ‘within the town’? Is this justified?

3.46 Would the Policy be effective in conserving the significance of designated Heritage Assets?

**Rural Areas**

**Policy SCLP35: Land at Innocence Farm**

3.47 Is the proposed allocation of land at Innocence Farm justified, taking into account the employment land requirement for the plan area and reasonable alternatives for port related development, and is it based on proportionate evidence?

3.48 Is there any matter which would mean that the site would not be developable?

3.49 In terms of the proposed access to the A14 road, is the policy sufficiently clear so that it is evident how a decision maker should react to a development proposal?
3.50 Is the provision of a rail connection justified and is it realistic? Is sufficient land allocated to accommodate adequate railway infrastructure to serve the site?

3.51 In regard to the criteria points a) – e) which specifies requirements for planning applications, would the policy be effective by not requiring an air quality assessment, landscape and visual assessment, noise assessment or transport assessment? Is point e) consistent with the findings of the HRA in referring to Habitats Regulation Assessment Screening?

Policy SCLP12.44: Land South of Forge Close between Main Road and Ayden, Benhall

3.52 Is the Policy justified in allocating land for about 50 dwellings given the size of the village and existing housing commitments?

Policy SCLP12.46: Land to the South of Station Road, Campsea Ashe

3.53 Would the Policy be effective in conserving the significance of the Listed Buildings near the site?

3.54 Is the site located where it would enhance or maintain the vitality of the village or local communities?

3.55 Should paragraph 12.496 refer to Wickham Market railway station?

Policy SCLP12.47: Land behind 15 St Peters Close, Charsfield

3.56 Would the Policy be effective in conserving the significance of the Grade I listed St Peters Church?

3.57 Is it justified that the Policy does not require a biodiversity survey and appropriate mitigation measures?

3.58 Can safe and suitable access to the site be achieved for all users?

Policy SCLP12.48: Land to the South of Darsham Station, Darsham

3.59 Is the Policy justified in dealing with the whole site area as mixed use, when the built development, except for access, would be provided in the north of the site?

3.60 Is the site located where it would enhance or maintain the vitality of the village or local communities?

3.61 Is the second sentence of paragraph 12.512 clear?

Policy SCLP12.49: Land North of the Street, Darsham

3.62 Is access via the Millfields development as set out in criterion a) deliverable and justified?
3.63 Paragraph 12.529 is inconsistent with Policy SCLP12.49 in respect of the number of dwellings anticipated.

**Policy SCLP12.50: Land off Laxfield Road, Dennington**

3.64 Is the provision of approximately 50 dwellings at the site justified given the size of the site and the proposed policy requirements?

3.65 Is the provision of dwellings designed to meet the needs of the older population justified?

3.66 Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?

**Policy SCLP12.51: Land to the South of Eyke CoE Primary School and East of the Street, Eyke**

3.67 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

3.68 Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?

**Policy SCLP12.52: Land to the West of Chapel Road, Grundisburgh**

3.69 Would the proposed access via Chapel Road and the wider village road network achieve safe and suitable access for all users? Is the Policy sufficiently clear as to how a decision maker should react to a development proposal in this regard? In terms of vehicular and pedestrian access and the requirement for any off site works, is the site deliverable or developable as per the Framework definitions?

3.70 Is the requirement for the provision of on-site public open space justified?

3.71 Is the provision of dwellings designed to meet the needs of the older population justified?

**Policy SCLP12.54: Land North of the Street, Kettleburgh**

3.72 Is the provision of approximately 16 dwellings on the site justified given the character and appearance of the area?

3.73 If the capacity of the site is less than that stated, should the criterion in regard to affordable housing be qualified given the requirements of Policy SCLP5.10 that contributions would be sought for schemes of 10 units or more?
Policy SCLP12.55: Land to the rear of 31-37 Bucklesham Road, Kirton

3.74 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Kirton Water Recycling Centre?

Policy SCLP12.56: Land at School Road, Knodishall

3.75 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Benhall Water Recycling Centre?

Policy SCLP12.58: Land North of Mill Close, Orford

3.76 Is the Policy in seeking a contribution towards affordable housing justified in the context of Policy SCLP5.10?

Policy SCLP12.59: Land adjacent to Swiss Farm, Otley

3.77 Notwithstanding paragraph 12.659 and the reference to policy SCLP11.2, the proposed allocation boundary appears to bisect farm buildings, with other buildings and structures adjacent. Is the Policy justified in not addressing the future of these structures given the uncertainty they present for the living conditions of future occupiers of any dwellings at the site, or on the continued use of the adjacent land for agricultural purposes?

3.78 Is the Policy justified in not requiring a contaminated land survey given the previous use of the site?

3.79 In the context of the requirements for a transport statement particularly addressing the B1078/B1079 junction, can the site be considered to be deliverable or developable?

Policy SCLP12.60 Land Adjacent to Farthings, Sibton Road, Peasenhall

3.80 Is the allocation of land for housing within an area of Flood Zone 2 justified in terms of the sequential test?

Policy SCLP12.61: Land between High Street and Chapel Lane, Pettistree (Adjoining Wickham Market)

3.81 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

3.82 Is the provision for the specified area of land for new early years setting justified and if so, should it be specifically identified/safeguarded on the Policies Map?
3.83 Would the development criteria be effective in providing a ‘soft gateway’ to Wickham Market or maintaining the separation of Wickham Market and Pettistree?

3.84 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Wickham Market Water Recycling Centre?

Policy SCLP12.62: Land West of Garden Square Rendlesham

3.85 Would criterion a) be effective in safeguarding the operation of the Rendlesham Water Recycling Centre and provide adequate living conditions for future residents of the site?

3.86 Is the figure of approximately 50 dwellings at the site justified?

Policy SCLP12.63: Land East of Redwald Road, Rendlesham

3.87 Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

Policy SCLP12.64: Land opposite The Sorrel Horse, The Street, Shottisham

3.88 Given the stated stance of the shareholders of the Sorrel House in representations, is the site deliverable or developable within the plan period?

3.89 Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

Policy SCLP12.65: Land off Howlett Way, Trimley St Martin

3.90 Paragraph 12.740. Is the site allocated in Felixstowe Peninsula Area Action Plan?

3.91 Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

Policy SCLP12.66: Land adjacent to Reeve Lodge, High Road, Trimley St Martin

3.92 Is the site boundary as defined justified in regard to the rear of properties on High Road?

3.93 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

3.94 Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?
3.95 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Kirton Water Recycling Centre?

3.96 What is the purpose of criterion j) and would it be effective?

3.97 Where is the evidence that the Policy has been subject to Habitats Regulations Assessment screening?

**Policy SCLP12.67: Land off Keightley Way, Tuddenham**

3.98 In respect of access and potential effects on the wider highway network is the Policy justified?

**Policy SCLP12.69: Land West of the B1125, Westleton**

3.99 In the context of the proposed community led housing schemes, is the scale of development proposed at Westleton justified?

3.100 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

3.101 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?

3.102 Would criterion e) be effective in safeguarding the characteristics of Westleton Common County Wildlife Site?

3.103 Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?

**Policy SCLP12.70: Land at Cherry Lee, Darsham Road, Westleton**

3.104 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?

3.105 Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?

**Policy SCLP72: Land at Street Farm, Witnesham (Bridge)**

3.106 Is the allocation of land for housing including an area of Flood Zone 3 justified in terms of the sequential test?

3.107 The proposed allocation boundary appears to exclude certain farm buildings. Is the Policy justified in not addressing the future of these structures given the uncertainty they present for the living conditions of future occupiers of any dwellings at the site, or on the continued use of the adjacent land for agricultural purposes?
Matter 4: Policies

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

Housing policies

Policy SCLP5.4: Housing in Clusters in the Countryside

4.1 Is the Policy consistent with national policy as set out in paragraph 78 of the Framework and what is the expected contribution to housing supply that would result from the Policy?

4.2 Is the Policy clear and unambiguous and is it evident how a decision maker should react to a development proposal for housing development in an existing ‘cluster’ in the Countryside?

4.3 Is it justified to require that a scheme is supported by the local community? Is the Plan clear as to how such support should be demonstrated?

Policy SCLP5.8: Housing Mix

4.4 The Framework in paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and be reflected in planning policies. Has the size, type and tenure of properties needed for the Plan area been adequately assessed and would the Policy be effective in meeting needs?

4.5 Is it justified to apply the housing size requirements as set out in Table 5.1 to all proposals of 5 or more dwellings? Have the viability implications of such requirements been assessed?

4.6 Is Policy SCLP5.8 justified and consistent with national policy in applying M4(2) standards to at least 50% of dwellings and on developments of more than 10 units?

4.7 Would the Policy be effective in meeting the housing needs of older people?

Policy SCLP5.9: Self Build and Custom Build Housing

4.8 Is the policy justified in terms of need, threshold and minimum target and how would it be effective in encouraging and providing for self-build and custom-build housing?

4.9 Would self-build and custom build housing be provided through Policy SCLP5.4?
Policy SCLP5.10: Affordable Housing on Residential Developments

4.10 Is the requirement for 1 in 3 dwellings on sites of ten units or more to be affordable units and the split between affordable/social rent, shared ownership and discounted home ownership justified and consistent with national policy? Are these requirements deliverable and viable?

Policy SCLP5.11: Affordable Housing on Exception Sites

4.11 Would the Policy be effective in conserving and enhancing landscape and scenic beauty in the AONB or preserving or enhancing Conservation Areas?

Policy SCLP5.12: Houses in Multiple Occupation

4.12 Would criterion b) of the Policy be effective in dealing with the transport implications of proposals?

Policy SCLP5.13: Residential Annexes

4.13 Is the Policy and supporting text in paragraph 5.73 consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions?

Policy SCLP5.14: Extensions to Residential Curtilages

4.14 Is the Policy clear as to which permitted development rights may be removed and why, and would the Policy be effective and consistent with national policy as set out in paragraph 53 of the Framework?

Tourism

Policy SCLP6.2: Tourism Destinations

4.15 Is the final paragraph of the Policy clear, consistent with national policy and is it evident how a decision maker should react to a development proposal where an assessment is required under the Habitats Regulations?

Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast

4.16 Is the 10 pitches/units threshold in criterion b) justified?

Policy SCLP6.5: New Tourist Accommodation

4.17 Is the Policy clear as to where new tourism accommodation comprising permanent buildings would be permitted and would it be effective?
4.18 Are the Policy and supporting text in paragraph 6.33 consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions? Is the restriction of occupancy to a period of 56 continuous days justified and should this be set out in the Policy?

Transport

Policy SCLP7.1: Sustainable Transport

4.19 What is the justification for the thresholds for Travel Plans and Transport Assessments and is the Policy consistent with paragraph 111 of the Framework?

4.20 Would criterion f) be effective in seeking public transport in rural areas only and is that consistent with national policy?

4.21 Would the Policy be effective in preventing significant impacts on the highway network?

Policy SCLP7.2: Parking Proposals and Standards

4.22 Is the Policy justified in seeking compliance with the 2015 Suffolk Guidance for Parking, East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy given that these documents do not form part of the development plan and is the Policy consistent with paragraph 105 of the Framework in respect of local parking standards?

Community Facilities and Assets

Policy SCLP8.2: Open Space

4.23 Is the Policy consistent with national policy which sets out circumstances when existing open space, sports and recreational buildings including playing fields may be built on as set out in paragraph 97 of the Framework?

Policy SCLP8.3: Allotments

4.24 Would the Policy be effective and is it clearly written given the repetition between criteria a) and d)?
**Climate Change**

**Policy SCLP9.1: Low Carbon and Renewable Energy**

4.25 The Policy supports low carbon and renewable energy developments (excepting wind energy) where they are in an area identified as suitable for renewable or low carbon energy. Where are areas suitable for renewable or low carbon energy defined?

4.26 Is it justified to require low carbon and renewable energy development to provide benefits to the surrounding community and is this consistent with national policy as set out in paragraphs 54 to 56 of the Framework in regard to the use of planning obligations and conditions?

**Policy SCLP9.2: Sustainable Construction**

4.27 Is the requirement that all new developments over 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate set out in the Building Regulations justified?

**Policy SCLP9.3: Coastal Change Management Area**

4.28 Is the Policy justified in seeking compliance with Shoreline Management Plans and/or endorsed Coastal Strategies given they are not part of the development plan?

**SCLP9.5: Flood Risk**

4.29 Has the preparation of the Plan taken a sequential, risk-based approach to the location of development as per national policy set out in the Framework?

*(This question has also been asked about specific allocations which include land in Flood Zones 2 and 3)*

**SCLP9.7: Holistic Water Management**

4.30 Is the requirement for phasing of development justified?

**Natural environment**

**SCLP10.1: Biodiversity and Geodiversity**

4.31 Is the statement that the Recreational Avoidance and Mitigation Strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation consistent with national
policy as set out in paragraph 34 of the Framework? Has the effect of any such contribution been assessed in terms of viability?

**SCLP10.3: Environmental Quality**

4.32 Given the requirements of the Habitats Regulations, would the Policy be effective in regard to impacts on European designated wildlife sites?

**SCLP10.4: Landscape Character**

4.33 Is the Policy consistent with national policy in respect of Areas of Outstanding Natural Beauty and Heritage Coasts as set out in the Framework in paragraphs 172 and 173?

4.34 Are the requirements for development to protect and enhance tranquillity justified?

**Built and Historic Environment**

**SCLP11.1: Design Quality**

4.35 Have the viability implications for residential development of the Building For Life 12 requirement been assessed and is the requirement justified?

4.36 Is criterion h) clear?

**Policy SCLP11.2: Residential Amenity**

4.37 Would the Policy be effective in securing adequate living conditions for future occupiers of new development?

**Policy SCLP11.4: Listed Buildings**

4.38 Is the Policy consistent with national policy as set out in paragraph 190 of the Framework in regard to the setting of a listed building?

**Policy SCLP11.5: Conservation Areas**

4.39 The Policy states that proposals for demolition of buildings in a conservation area will only be permitted in defined circumstances. Are the listed criteria consistent with paragraphs 195 and 196 of the Framework and are they justified?

**Policy SCLP11.6: Non-Designated Heritage Assets**

4.40 In respect of proposals which would result in the loss of a non-designated heritage asset, is the Policy consistent with national policy as set out in paragraph 197 of the Framework in terms of the significance of a building?
**Policy SCLP11.9: Areas to be Protected from Development**

4.41 What is the justification for the specific areas to be protected from development as shown on the Policies map?

4.42 Is the Policy clear in respect of what development in the designated areas would be ‘severely restricted to’ and would it be effective?

*Philip Lewis*

INSPECTOR

21 June 2019