

MARTLESHAM PARISH COUNCIL

Response to Consultation on the Suffolk Coastal Local Plan: Modifications

July 2020

TRACKED CHANGE VERSION OF LOCAL PLAN MAY 2020	MM	MODIFICATION	COMMENT
Page 10 @1.33	3	<p>Amended paragraph 1.33 reads:</p> <p>The Local Plan sets out the level of growth which needs to be planned for in Suffolk Coastal and identifies where this should be located and how it should be delivered. The Plan sets out the <u>strategic and non-strategic</u> planning policies which the Council will use to determine planning applications across Suffolk Coastal, <u>along with policies in made Neighbourhood Plans</u>. This Local Plan will cover the period 2018-2036.</p>	We support the identification of the important role Neighbourhood Plans play in the planning process.
Page 16/17@2.8 and Page 19 @SCLP 2.1	4	<p>Additional text inserted at the end of paragraph 2.8</p> <p>The housing need figures for the authorities in the ISPA are shown in Table 2.1. The starting point for each authority will be to meet their own housing needs within their own boundary. <u>Reflecting the agreed outcomes in the ISPA Statement of Common Ground (March 2019), where through the plan making process and adoption of a local plan, an authority is unable to meet its own housing need, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how need can be met within the ISPA. Where this would necessitate considering spatial and policy options to plan for further growth above that planned for within this Local Plan, a review of the Local Plan would be necessary. Policy SCLP2.1 refers to immediately commencing a review of the Local Plan or the strategic policies. In the context of the production of a Local Plan, the actions related to immediately commencing a review are likely to initially entail a review of the Local Development Scheme, consideration of strategic cross boundary issues and the production and consideration of an updated evidence base.</u></p> <p>Additional text inserted to Policy wording SCLP 2.1:</p> <p>SCLP 2.1 Should it be determined through the plan making process that <u>another authority within the ISPA is unable to meet its minimum housing need, the Council will, under the duty to cooperate, work collaboratively to determine whether housing development needs that cannot be met wholly within a particular plan area, could be met elsewhere. An agreement to</u></p>	<p>We question what prompted this amendment - the explanation is not provided in the explanatory text preceding the policy wording.</p> <p>We support any amendment which reduces the occasions which would trigger an early review of the Local Plan. We recommend any unmet need for housing which triggers a review should be restricted to a review of strategic <u>ISPA/housing</u> policies only and not <u>all</u> strategic policies in the Local Plan – and then to specify what a “review” would entail</p> <p>Any such amendment MUST be reciprocal in neighbouring Local Plans.</p>

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		<u>seek to accommodate unmet housing need would trigger an immediate review of the strategic policies of this Plan.</u>	
Page 19@ 2.15	5	<p>Modifications to paragraph 2.15: Additional text inserted</p> <p><u>Development in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and the ISPA authorities agree that robust steps must be taken to prioritise healthy and sustainable travel. A package of transport mitigation measures has been identified to reduce vehicle movements. Suffolk County Council as the Highway Authority has developed a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network. These include:</u></p> <ul style="list-style-type: none"> - <u>Transport infrastructure to encourage and support sustainable modes of transport</u> - <u>A Bus Quality Partnership</u> - <u>A Smarter Choices programme</u> - <u>Review of car parking and pricing strategies</u> - <u>Review of park and ride strategy</u> <p>...</p>	<p>This must point to an area-specific and clearly identifiable set of documents. The package of transport mitigation measures must be identified so that it can be consulted upon, referenced and validated. However, it is noted that the Transport Plan on the Suffolk County Council Website is dated 2011-2031 so is significantly out of date. Also, the map of strategic transport improvements on page 5 of Part 2 of the Transport Plan does not show any strategic improvements which would address problems in the ESC portion of the Ipswich Strategic Planning Area.</p>
Page 51	7	<p>Amended Policy SCLP3.3 Settlement Boundaries 4th paragraph reads:</p> <p>Proposals for new residential development outside of the Settlement Boundaries <u>and outside of land which is allocated for development</u> will be <u>carefully managed</u> strictly controlled in accordance with national planning policy guidance and the strategy for the Countryside.</p>	<p>We cannot see the justification for this change – the explanatory wording at paragraph 3.50 appears unaltered yet the Policy wording is revised and diluted for enforcement purposes.</p> <p>This change represents a significant relaxation of the controls on development.</p> <p>We recommend re-instating 'strictly controlled' per the original draft Policy wording.</p>

TRACKED CHANGE VERSION OF LOCAL PLAN MAY 2020	MM	MODIFICATION	COMMENT
Page 52@ 3.53-3.59	8	<p>Major Infrastructure – modified to include “<i>during the construction, operation and decommissioning</i>” of Sizewell across paragraphs 3.52 – 3.59</p> <p>Modification to paragraph 3.54:</p> <p>The decisions in respect of the new power station will be taken at a national level as a Nationally Significant Infrastructure Project (NSIP) with various regulators assessing safety, security and other issues through the necessary design and construction. <u>Decisions on any other energy related projects identified as NSIPs will also be taken at a national level, taking into consideration relevant National Policy Statements....</u></p>	<p>A welcome modification but we note the poor drafting.</p> <p>We recommend “will also be taken at a national level” is elevated to “must” at paragraph 3.54.</p> <p>We recommend explicitly stating “<u>all</u> nationally significant energy projects or infrastructure projects <i>must</i> be taken at a national level in line with national policy, taking into account East Suffolk policy.</p>
Page 53@ 3.56	8	<p>Major Infrastructure - Text inserted to paragraph 3.56</p> <p><u>...Where new major energy projects are proposed, potential alternative sites, located outside of designated areas should be considered at an early stage.</u></p>	Ambiguity in drafting – what is a designated area?

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Page 53 @ 3.57 and 3.59	8	<p>Modification to paragraph 3.57:</p> <p>The cumulative impact of hosting a variety of major energy infrastructure facilities in the area is likely to have an impact on existing and future generations. To balance this impact a variety of local economic, environmental and community <u>mitigation and enhancement measures</u> benefits will need <u>may be required to be delivered</u> to ensure <u>proposed Major Energy Infrastructure Projects are acceptable in planning terms, an overall positive balance of outcomes for the local communities and the District.</u> Community mitigation and enhancement could take many different forms over the plan period, but in land use terms these could be in the form of but not limited to examples such as sports facilities, meeting places, woodland planting schemes or habitat creation. Any measures proposed would need to be in accordance with the tests of for planning obligations and planning conditions set out in the National Planning Policy Framework.</p> <p>Modification to paragraph 3.59:</p> <p>A variety of local issues have been identified by the Council, as local planning authority, which need to be addressed in relation to Major Energy Infrastructure Projects. The Council will work with the local community, other local authorities, Government agencies, service providers and operators to ensure the most successful outcomes are achieved. <u>Although</u> Table 3.6 <u>identifies a variety of issues that may not be relevant to every Major Energy infrastructure Project, it below</u> is intended to inform pre-application and early engagement discussions and provides an early view on potential constraints and opportunities across the <u>plan area</u> District.</p>	<p>Review poor drafting - the relevant considerations are already set out satisfactorily at Table 3.6 (as amended).</p> <p>We support the amended text to Table 3.6. but without amendment to the title.</p> <p>We consider National Planning Policy Framework (NPPF) compliance is mandatory (we therefore recommend the use of “must” not “may”).</p> <p>We recommend deleting paragraph 3.57.</p> <p>We recommend keeping paragraph 3.59 as originally drafted</p>

TRACKED CHANGE VERSION OF LOCAL PLAN MAY 2020	MM	MODIFICATION	COMMENT
Page 53,54 Table 3.6	8	<p>Modification to Table 3.6 under Environment</p> <p>Title to Table 3.6 - Themes <u>that may be relevant to the consideration of energy infrastructure proposals during the construction, operation and decommissioning stages.</u></p> <p>- Impact of light pollution to nocturnal species, and on the AONB and the historic environment</p> <p>-Appropriate landscaping of sites after the decommissioning phases</p> <p>-Habitat loss and noise disturbance for species <u>and noise disturbance regarding the historic environment</u></p> <p>-Effect of light and dust on nature conservation sites <u>and the historic environment</u></p> <p>-<u>Impact on tranquillity</u></p>	<p>We recommend omitting the amended text in the title of Table 3.6.</p> <p>What does “noise disturbance regarding the historic environment” actually mean?</p> <p>We support the addition of Impact on tranquillity.</p>
Page 58	8	<p>Additional text inserted as new paragraph 3.68</p> <p><u>The Habitats Regulation Assessment of this Local Plan recommends that clarity is provided in the Local Plan regarding the timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen in order to ensure that there are no significant effects on European sites. The Cross Boundary Water Cycle Study identifies water recycling centres where treatment measures are expected to be needed to ensure that the objectives of the Water Framework Directive and the Habitats Regulation Directive are not compromised. This may also include improvements to the wider wastewater network. Anglian Water, in their role as a water company, and the Environment Agency, in their environmental oversight capacity, advise that phasing of development should be provided for in this respect. However, this should only be required where the size and type of development allows for phasing and where improvement works are identified. The cumulative impact of development should also be considered when determining the need for phasing.</u></p>	<p>Requires redrafting -</p> <p>This paragraph reads more like a drafting note, and as it stands is inappropriate to the Local Plan itself</p>

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Page 60 @ SCLP3.5	9	<p>Policy SCLP3.5 Infrastructure Provision</p> <p>....Development will be expected to follow the principles of Holistic Water Management as set out in Policy SCLP9.7 and will not be permitted where it would have a significant effect on the capacity of existing water infrastructure and follow the principles of Holistic Water Management. Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and wastewater network in time to serve the development. Where there is no insufficient capacity in the water recycling centre, Anglian Water will review the requirements for investment and development may will need to be phased, where necessary, in order to allow time for improvement works to take place, if required. The improvements shall ensure there is no breach of environmental legislations particularly in relation to the Water Framework Directive and Habitats Regulations Directive or subsequent replacements. The agreed improvements should be in place before occupation of proposed dwellings in order to avoid a breach of environmental legislations...</p>	<p>Review redrafting not least to correctly tie in the current legislation on Water and Water Services as amended from time to time.</p> <p>We recommend changing 'review' to 'assess' in "Anglian Water will review the requirements for investment"</p> <p>The Habitat Regulations Assessment authors have made a series of recommendations for inclusion in the Modified Final Draft Plan. Please see Appendix A.</p> <p>We recommend the HRA report writers provide the text for further modified wording for the Local Plan (i.e. both the explanatory text preceding the policy wording and the actual Policy wording).</p>
Page 64 @ 4.1-4.21		<p>Economic Activity – refers variously to East Suffolk/ area/ plan area/ local/ former Suffolk Coastal area/ Suffolk coastal local plan area/ the former suffolk coastal district council/ the Council</p>	<p>Requires consistent use of terms across the Local Plan.</p> <p>We recommend the 'Council' and 'The Local Plan Area'.</p> <p>Typographical error at 4.1 delete "which" before "makes".</p>
Page 69 @SCLP 4.2 Page 70@SCLP 4.3	10	<p>SCLP 4.2 New Employment Development - Additional text at second and third paragraphs, and a new fourth paragraph</p> <p>Proposals for new employment development falling within use classes B1, B2 and B8 outside of existing Employment Areas but within Settlement Boundaries will be supported where these do not have an unacceptable adverse impact on the surrounding land use, living conditions of local residents and local highway network.....</p>	<p>Review the drafting to phrase in the positive.</p> <p>If something 'Avoids' any adverse impact that surely means there is no adverse impact? Use "prevents" instead of 'avoids'?</p> <p>We recommend proposals will be supported where they do not have an adverse impact.</p>

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		<p>Proposals for new employment development falling within classes B1, B2 and B8 on land outside of Settlement Boundaries will be permitted where.....and</p> <p>a) It would not have an <u>unacceptable</u> adverse impact on surrounding land use; and</p> <p>b) It <u>avoids, or adequately mitigates, any</u> would not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment.</p> <p><u>In addition to the above, proposals for B1a office premises outside of town centres other than for small scale rural offices in accordance with Policies SCLP4.5, SCLP4.6 and SCLP4.7 on sites not allocated for employment use, should also be subject to a sequential test which demonstrates that there are no suitable and available sites within firstly town centres and then edge of centre sites to accommodate the proposal.</u></p> <p>Amendments to SCLP 4.3 Expansion and Intensification of Employment Sites</p> <p>Proposals to expand...will be permitted unless:</p> <p>a)...</p> <p>b) There will be <u>an unacceptable adverse effect on</u> a material harm to the environmental sustainability in <u>of</u> the area</p> <p>c)...</p> <p>d) There is an unacceptable adverse effect on harm to the amenity and living conditions...</p>	<p>Review the drafting.</p> <p>We recommend this is put in the positive as a general rule specifying the conditions which must be satisfied for B1a office premises, then apply exceptions to the rule and then apply the exemptions.</p> <p>This has been diluted by changing material harm to 'unacceptable adverse effect'.</p>

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Page 71 @ 4.32	12	<p>Economic Development in Rural Areas Modification to paragraph 4.32</p> <p>National planning policy seeks to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas. <u>Agriculture is particularly important to the District's economy and there is a need to enable the sector to erect new buildings, structures and infrastructure that it requires to grow, modernise and function efficiently. The Local Plan acknowledges that these buildings may need to be located in countryside locations.</u></p>	Redraft the modification to say "The Local Plan recognises that new buildings, structures and infrastructure are needed within the countryside to support the local agricultural economy."
Page 73 @ SCLP 4.5	12	<p>SCLP Policy 4.5 - Economic Development in Rural Areas</p> <p>Proposals will be supported where:</p> <p>a) b) c) The design and construction <u>avoids or adequately mitigates any</u> do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment; d) e) f) The proposal delivers additional community, cultural or tourism benefits.</p> <p>Additional text:</p> <p><u>Proposals will be expected to provide additional community, cultural or tourism benefits where opportunities exist.</u></p> <p><u>The delivery of new buildings, structures and infrastructure that the agricultural industry requires to grow, modernise and functions efficiently will be supported.</u></p>	<p>We do not support the diluting of the policy controls.</p> <p>We favour restoring the deleted sentence to ensure proposals will be supported where they "deliver additional community, cultural or tourism benefits."</p> <p>We recommend in the alternative</p> <ul style="list-style-type: none"> • Use 'proposals must provide' rather than 'Proposals will be expected to' • Add a new provision "Where the agricultural economic benefit requires it"

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Page 82@ 4.63	15	<p>Town Centres. New paragraph 4.63 reads:</p> <p><u>In primary shopping areas, the policy aims to ensure a dominant retail appearance which supports high levels of footfall. As such the policy restricts proposals which would undermine this approach and result in concentrations of non A1 uses. In coming to a view as to whether a proposal would result in a concentration of non A1 uses, using Table 4.1 as a baseline, the Council will have regard to the total number and proportion of different use classes along the immediate frontage and the continuity of non A1 uses</u></p>	<p>Review drafting - Which policy? SCLP 4.9?</p> <p>Review the drafting to put in the positive – State the conditions which must be satisfied for approval of dominant retail appearance.</p> <p>We recommend this policy aim (to ensure a dominant retail appearance in order to support high levels of footfall) should be included in the policy wording at SCLP 4.9</p>
<p>Page 92@ 5.25</p> <p>Page 94@SCLP 5.4</p>	16	<p>HOUSING CLUSTERS</p> <p>Amended paragraph 5.25 reads:</p> <p><u>A 'close group' of dwellings adjacent to an existing highway, is one where the dwellings are considered to be adjacent to each other, and not separated by extensive open areas. There may, for example, be garden space or other buildings between dwellings however separation by fields or open land would not constitute a close group.</u></p> <p>SCLP 5.4 HOUSING IN CLUSTERS IN THE COUNTRYSIDE</p> <p>Proposals for new dwellings within 'clusters' in the countryside will be supported where:</p> <p>a) The proposal is for up to three dwellings within a cluster of five or more dwellings; Or The proposal is for up to five dwellings within a cluster of at least ten existing dwellings AND....</p> <p>A 'cluster' in this context of this Policy: consists of a continuous line of existing dwellings or a close group ...</p>	<p>Review drafting</p> <ul style="list-style-type: none"> • It is not immediately clear where "close group" is used or why it is defined • It is inconsistent <p>We recommend inserting "In the definition of 'cluster' at SCLP 5.4, a 'close group' means...."</p> <p>Does this mean three <u>new</u> dwellings within a cluster of five <u>existing</u> dwellings?</p>

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Page 94 @ SCLP 5.4	16	<p>SCLP 5.4 HOUSING</p> <p>Where more than three dwellings are proposed under criterion b) above, applicants must be able to demonstrate that the scheme has the support of the local <u>meaningful and effective community engagement has taken place in the development of the scheme</u> and that the mix of dwellings proposed would meet locally identified needs.</p>	<p>Why has this been change been made?</p> <p>We recommend the wording retains a requirement for the support of the local community.</p>

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Page 99 @ 5.38	17	<p>HOUSING MIX Amended text at paragraph 5.38</p> <p>.. a particular focus on smaller properties has been identified. Policy SCLP5.8 includes a requirement for at least 40% of new dwellings to be 1 or 2 bedroom properties.....</p>	<p>This removes the <i>requirement</i> to have 40% of new dwellings as 1-2 bedroom dwellings and replaces it with a weak and diluted phrase "<i>a particular focus on smaller properties</i>"</p> <p>The Planning Inspector asked the Council to revisit SCLP 5.8 to delete 'at least 40%' 1 and 2 bed properties and provided suggested wording.</p> <p>We recommend adopting the Inspector's recommended wording "proposals for new housing will be expected to deliver the housing needed for different groups in the community as identified in the latest Strategic Housing Market Assessment. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 or 2 bedrooms)"</p>

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Page 101 @ 5.43 – 5.49	17	<p>Housing need evidence for older people and SCLP 5.8</p> <p>Amended paragraph 5.38 and Table 5.1:</p> <p><u>In reflection of the extent of need for older persons accommodation, Policy SCLP5.8 references that housing development over the plan period will contribute to the significant need for accommodation for older people and that all housing development of ten or more dwellings should demonstrate how it will contribute to meeting the needs of older people. ... larger allocations would consider and address needs for specialist accommodation where feasible as part of meeting this requirement.</u></p> <p>SCLP 5.8 HOUSING MIX amended text</p> <p>On proposals of 10 units or more <u>non-specialist dwellings</u> at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. <u>All specialist dwellings will be expected to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. Only in exceptional circumstances would a lower percentage of M4(2) dwellings be permitted. In such circumstances applicants would need to demonstrate that provision is either unfeasible or unviable and that the development incorporates alternative measures to enhance accessibility and adaptability where possible.</u></p>	<p>We support the policy that Housing need evidence can now be a material consideration.</p> <p>The intentions of providing for older people is also welcomed in paragraphs 5.42 – 5.49.</p> <p>The Planning Inspector asked that the Council revisits the calculation of minimum percentage dwellings which should meet M4(2) having regard to the contribution made by specialist housing, so he could then conclude what was an appropriate percentage figure to be applied to non-specialist housing.</p> <p>The drafting (particularly in 5.43) needs revision.</p> <ul style="list-style-type: none"> • Are the dwellings on larger sites, new dwellings or total of existing and new dwellings? • Incorrect paragraph references • An earlier, brief explanation of M4(2) and M4(3) text would help with the flow of the explanatory text • What does '...<i>where feasible</i>' 'unviable' and 'unfeasible' mean in this context? • On all proposals of 10 or more new dwellings, suggest 'at least 50% (better phrased as 50% or more) should meet the requirements of M4(2) • In what circumstances would a <i>specialist</i> site fail to meet the M4(2) requirement?

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Page 108 @ 5.66 Page 110 @ SCLP 5.10	18	<p>Policy SCLP5.10: Affordable Housing on Residential Developments</p> <p>Newly added Modifications to Paragraph 5.66:</p> <p>“In exceptional circumstances where proposals are not able to meet the requirements for affordable housing for viability reasons, and to ensure that development can still come forward and overall housing delivery is not compromised, the Council may agree to alter the requirements subject to this being demonstrated through a comprehensive viability assessment, to the Council’s satisfaction. Before reducing the overall provision of affordable housing, the tenure and type of affordable housing should be first adjusted to secure viability. In line with the National Planning Policy Framework, viability assessments will be made publicly available. Guidance on viability assessments is contained in Appendix G. <u>The Council’s Whole Plan Viability Study (January 2019) identified a series of site and development typologies that are common across the District. The Study shows that flatted developments on brownfield sites may not be viable when meeting the policy requirement for affordable housing. Nevertheless, where at the planning application stage provision of affordable housing is considered by an applicant to not be viable the Council would require demonstration of this through a viability assessment following the guidance contained in Appendix G.</u> In determining whether a site has capacity for more than ten units, consideration will be given to the potential developable area of a site and an appropriate density for development that accords with Policy SCLP11.1 Design Quality. The National Planning Policy Framework states that where vacant buildings are being re-used or redeveloped an affordable housing contribution should be reduced by a proportionate amount.”</p> <p>Policy SCLP5.10:</p> <p>In exceptional circumstances, where the Council is satisfied that the provision of affordable housing is not viable, as demonstrated through a viability assessment the Council may agree to vary the requirement for affordable housing. <u>The requirement for affordable housing does not apply to developments which are solely brownfield flatted schemes. In schemes with a mix of housing types the affordable housing provision will be assessed as a whole</u></p>	<p>Review the drafting of the accessible housing provisions considering document J14 in the Examination Document Bank</p> <p>We appreciate that the modification aims to address the Planning Inspector’s questions:</p> <ul style="list-style-type: none"> (a) the Inspector asked the Council whether 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 is justified and consistent with national policy and whether these requirements are deliverable and viable? (b) the Inspector asked the Council to consider a modification to the supporting text related to viability, to reflect that the Whole Plan Viability Study has concluded that achievement of the policy may not viable in relation to brownfield, flatted development. <p>In our view, the explanatory text does not explain the decision to exclude affordable housing from purely flatted brownfield sites.</p>

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Page 126 @ SCLP 6.2	25	<p>Policy SCLP6.2: Tourism Destinations Amended text</p> <p>Any destinations which would result in significant adverse effects <u>on European sites</u> which could not be appropriately mitigated will not be permitted</p>	<p>We question why this is limited to European sites – if it is to be retained, the term “European site” needs to be defined earlier on in the Plan and adopted consistently across the Plan. An attempt to define it appears at page 176 of the tracked changes version of the Local Plan at paragraph 10.17</p>
Page 131 @ 6.33	28	<p>New tourism accommodation paragraph 6.33 amended</p> <p>..New tourism accommodation will be should therefore be restricted by planning conditions and/or legal agreements to ensure that these uses can provide all year-round occupation for tourists and are not occupied by a person or persons as their main residence so that it is retained for the benefit of the tourism economy and not lost to residential use. Restricting Planning conditions will limit the occupation of new self-catering tourist accommodation units to a continuous period of 56 days by one person or persons within one calendar year retains these units for the benefit of the tourism economy by providing a range of available accommodation for those wishing to visit the district. The owners/operators of the accommodation will be required to maintain an up to date Register of all lettings, which shall include the names and addresses of all those persons occupying the units during each individual letting. The Register will be required to be made available at all reasonable times to the Local Planning Authority.</p>	<p>Review drafting- Suggest instead - new “all year round” tourist accommodation must not be used as a permanent residence and occupation will be restricted to a maximum of 56 days per person in any one calendar year</p> <p>Note: the latter will not prevent back to back bookings of 112 days over 2 different calendar years, nor splitting a long let between connected persons</p>

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Page 135 @ 7.5 Page 137 @ SCLP 7.1	29	<p>Transport Additional text at new paragraph 7.5</p> <p><u>In order to mitigate the cumulative impacts of growth in the Ipswich Strategic Planning Area on junctions and roads in and around Ipswich, and to promote healthy travel options, a package of transport measures has been identified to reduce vehicle movements. They include:</u></p> <ul style="list-style-type: none"> • <u>Transport infrastructure to encourage and support sustainable modes of transport</u> • <u>A Bus Quality Partnership</u> • <u>A Smarter Choices programme</u> • <u>Review of car parking and pricing strategies</u> • <u>Review of park and ride strategy</u> • <u>Junction improvements</u> <p><u>Sustainable transport measures will therefore be expected to promote and deliver modal shift in a manner consistent with local strategies.</u></p>	<p>We recognise the difficulties in providing public transport in rural areas and support the introduction of an identifiable and validated package of local transport measures.</p> <p>Should Policy SCLP7.1 be reviewed in light of social distancing?</p> <p>We question whether paragraphs 7.1& 7.2 contradict paragraph 7.5 and whether a package of local measures has been identified?</p> <p>We recommend Policy 7.1 expressly incorporates an identifiable transport document which may be referenced.</p> <p>The Habitat Regulations Assessment authors recommend the Plan “ includes text at an appropriate point to highlight the potential risk of traffic emissions to designated sites with features sensitive to air pollution, and that the Council commits to working with neighbouring authorities to gather more data to inform future plan reviews.”</p>
Page 139 @ 7.18 Page 141 SCLP 7.2	30	<p>Parking. Modifications to paragraph 7.18:</p> <p>As local highways authority, Suffolk County Council published ‘Suffolk Guidance for Parking’ in 2015 <u>and subsequently reviewed this in 2019.</u></p> <p>Additional text inserted at end of paragraph 7.18</p> <p><u>The parking standards contained in the Suffolk Guidance for Parking, and any subsequent revisions, should be considered as the principle starting point for development proposals involving parking. Development proposals involving parking that are unable to apply the guidance should provide evidence justifying why the guidance is not applicable to the proposal.</u></p> <p>SCLP 7.2 Policy Wording amended in final paragraph</p> <p>Proposals will be expected to meet <u>have regard to</u> the parking standards contained in the 2015 Suffolk Guidance for Parking (or including subsequent</p>	<p>The Guidance was not just reviewed, it was revised in 2019.</p> <p>We recommend “revised in 2019” is substituted for “reviewed in 2019”.</p> <p>The reason behind excluding ‘Residential Parking Design’ is not explained</p>

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		revisions), where they do not relate <u>excluding the elements of the Guidance related to 'Residential Parking Design'</u> , unless other local planning considerations indicate otherwise...	
Page 154 @ SCLP 9.1	33	<p>Policy SCLP9.1: Low Carbon & Renewable Energy Modified Policy wording</p> <p>The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below: low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the following criteria:.....</p> <p>.....</p> <p>Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan. The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed above:</p> <p>The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria. Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan</p> <p>...</p>	<p>The entire drafting of Policy SCLP 9.1 requires a review as it is contradictory and confused.</p> <p>What is the justification for passing the responsibility of sustainable low carbon delivery to Neighbourhood Plans? And then excepting wind power?</p> <p>It is unclear what the Council supports, and where.</p> <p>What is the policy for areas not covered by Neighbourhood Plans?</p>
Page 168 @ 9.61	36	<p>Holistic Water Management Modification to paragraph 9.61:</p> <p>.....In respect of implementing holistic water management, and applying the conclusions of the Habitat Regulations Assessment that underpins the Local Plan, to assure the timely delivery of required infrastructure and treatment capabilities, new developments will be required to be phased to allow water</p>	<p>Review drafting</p> <p>The Habitat Regulations Assessment authors have made a series of recommended wording for inclusion in the Modified Final Draft Plan. Please see Appendix A</p>

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		and wastewater infrastructure to be in place when needed. <u>There will however not always be a requirement for development to be phased, for example, where there are no identified water and/or wastewater improvement works required to serve the development, or where measures are or will be in place in a timely manner. The Council will work with the water companies, Natural England and the Environment Agency to ensure that water related matters and required infrastructure needs are continually reviewed and resolved to meet the needs arising from growth, as set out in the Monitoring Framework (Appendix C) of this Plan.</u>	
Page 174 @ 10.16 Page 175 SCLP 10.1	37	<p>Biodiversity and Geodiversity Paragraph 10.16 amended to add</p> <p><u>"In the majority of cases, a RAMS contribution will be the Council's preferred mechanisms for securing mitigation"</u></p> <p>And combining previous paragraph 10.17 with previously paragraph 10.16 to add</p> <p><u>"...In the interests of ensuring the continued effectiveness conservation of mitigation measures such as SANGs and compensatory areas, they will be protected in perpetuity" considerable weight should be afforded to the conservation of such measures where they are included as part of large scale development proposals.</u></p>	<p>The Habitat Regulations Assessment authors have made a series of recommendations for inclusion in the Modified Final Draft Plan here and for SCLP 10.1. Please see Appendix B</p>
Page 178@ 10.26		<p>Environmental Quality - New paragraph 10.26 inserted</p> <p><u>10.26 The Habitats Regulations Assessment of the Local Plan has identified the potential for emissions from vehicles and impacts on water quality and water quantity to have an effect on European protected sites, and has made recommendations in relation to monitoring as referred to in the Monitoring Framework in Appendix C. Where necessary, potential effects on European protected sites would need to be considered through the Habitats Regulations Assessment process.</u></p>	<p>We recommend SCLP Policy 10.3 includes a Habitats Regulation Assessment in the list as introduced in paragraph 10.26</p>

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Page 180@10.35 Page183 @SCLP10.4		<p>Additional text inserted at 10.35 <u>The National Planning Policy Framework states that planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, and sets out a series of 'tests' against which applications for major development would be considered. The NPPF explains that whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</u></p> <p>SCLP 10.4 Landscape Character - Additional text inserted <u>Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts. Planning permission for major development in the Area of Outstanding Natural Beauty will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, subject to the considerations set out in the National Planning Policy Framework</u></p>	<p>We recommend referring expressly to NPPF 172 and use NPPF wording. NPPF wording is "assessments" not "tests".</p> <p>We recommend 'Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty'...i.e. delete 'that cannot be adequately mitigated.'</p>
Page 187@11.9	41	Design Quality. Built and Historic Environment – references to Build For Life (BFL) considerations	We recommend simplifying the drafting by stating the BFL 12 (as amended) will be the Assessment framework used to inform applications and applicants should include a BFL 12 assessment within any Design and Access Statement.
Page 192 @ SCLP 11.2	41	<p>Policy SCLP11.2: Residential Amenity Additional text added</p> <p><u>"Development will provide for adequate living conditions for future occupiers and will not cause an unacceptable loss of amenity to neighbouring for existing or future occupiers of development in the vicinity"</u></p>	<p>The drafting should maintain a strong expectation of high-quality design.</p> <p>Please clarify this also covers existing occupiers of existing properties.</p> <p>We recommend instead <i>"Development will provide for superior living conditions for future occupiers.."</i></p>

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Page 200 @ 11.40	47	<p>Modification to paragraph 11.40:</p> <p><u>Scheduled Monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments</u>, are nationally significant assets and afforded great protection in the National Planning Policy Framework...</p>	<p>We support this modification.</p> <p>We recommend the list of Designated Heritage Assets at Policy SCLP 11.8 is expanded to expressly incorporate the Heritage Park and Scheduled Monuments at Brightwell Lakes.</p>
Page 205@ 11.45 / 11.46 and SCLP 11.9	49	<p>Policy SCLP11.9: Areas to be Protected from Development Policy Wording and supporting text 11.45 & 11.46 has been removed</p> <p>Areas to be Protected from Development 11.45 Areas to be protected from development are a long established policy across the District. These areas make an important contribution to the setting or character of a Town, Village or surrounding countryside. The identification of these areas is necessary to resist infilling development that could be detrimental to the character, spacing or density of a particular area. 11.46 In some locations such as Trimley St Martin and Trimley St Mary, areas to be protected from development have been identified to maintain the separation between settlements. The identification of these adjacent to residential allocations established in the Felixstowe Peninsula Area Action Plan reinforces the separation between settlements and protects the individual character of settlements. Policy SCLP11.9: Areas to be Protected from Development Areas to be protected from development as identified on the Policies Map comprise local scale sites, gaps, gardens and spaces that make an important contribution to the character and setting of a settlement in their unaltered form. In some locations these areas maintain settlement separation. Accordingly, development within these areas will be severely restricted to maintain the character of the area and ensure settlement coalescence is not compromised.</p>	<p>Please confirm this means that Areas Protected from Development by made Neighbourhood Plans (i.e. which have been put out to consultation, referendum and validation) are retained as areas protected from development. The Local Plan policy maps exclude settlement areas which are within the boundaries of made Neighbourhood Plans.</p> <p>In areas not covered by Neighbourhood Plans, the Inspector has not required the removal of Areas Protected from Development only asked for the justification for their retention. The justification for their removal outside of Neighbourhood Plan areas, should be made on a case by case basis with full community engagement. We object to the blanket removal of this Policy.</p>

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Page 285 @ 12.231	67	<p>Modifications to paragraph 12.231</p> <p>The Martlesham Neighbourhood Plan was 'made' in July 2018. Policy MAR5 identifies a need for bungalows, flats and sheltered accommodation in Martlesham Heath. <u>Due to its physical separation from the lower density parts of the village and its accessible location</u> it is considered that this site lends itself to <u>incorporating a mix of providing</u> flatted development and small, high density units in a manner which contributes to a high quality of design, due to its physical separation from the lower density parts of the village.</p>	<p>There is a contradiction as paragraph 55 of the Local Plan says the site is well connected whereas here it says the site has a physical separation.</p> <p>If it is recognised there is a physical separation, we require Policy wording which recognises that our intention is to have only the number of flats necessary to enhance the overall mix of housing in Martlesham. We do not accept that spatial separation, of itself, justifies intensively flatted development.</p> <p>If it is recognized that the site is well connected, we require Policy wording which recognises the heritage and connectivity with the rest of Martlesham Heath.</p> <p>We recommend a provision to ensure high quality innovative design in housing reflecting similar provisions cited elsewhere in the Local Plan.</p>
Page 285 @ 12.232	67	<p>Additional text inserted at the end of paragraph 12.232</p> <p><u>In identifying provision for open space and sports facilities, consideration should also be given to any needs being met by the existing sports provision on site, and any loss of provision, including through the proposed creation of alternative sports uses. Existing open space and sports facilities provision should be assessed in terms of whether it is surplus to requirements, would be replaced elsewhere or redevelopment of the site would incorporate equivalent or better provision in respect of quantity and quality. Owing to the existing facilities on site, the policy expects that open space and sports provision would be made available for the community through the redevelopment of the site.</u></p>	<p>We recommend that this paragraph reflects the need to provide actual sports provision <i>on site</i> and not simply provide funds to redress any loss of sporting provision without addressing the availability (or lack of availability) of local land to host sports provision.</p> <p>We recommend that the wording enunciates an intention to lock in sports provision on site.</p>

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Page 285 @ 12.234	67	<p>Modifications to paragraph 12.234</p> <p>This site affects an area of extremely high archaeological significance and potential, on the former Martlesham Heath in the area of a series of at least eight Bronze-Age/prehistoric barrows which are either extant monuments or cropmarks. <u>Three of the aforementioned eight bowl barrows are Scheduled Monuments and are outside but in close proximity to the site boundary to the north and west. The centre of the site includes below ground remains of one of these eight bowl barrows. One of these, a cropmark, lies on the site itself.</u></p>	<p>We recommend any newly identified assets are included within SCLP 12.25 (0) so that it reads:</p> <p>(o) Design, layout and landscaping to respect the site's close proximity to three Scheduled Monuments, any extant and newly identified non-heritage assets and a Bowl Barrow on site.</p>
Page 286 @ 12.236		<p>Modifications to paragraph 12.236</p> <p>The site presents an opportunity to provide outdoor spaces, exercise trails, community facilities and shared work / meeting space. The natural woodland surroundings, sports facilities and location in relation to networks of green infrastructure present an opportunity to provide community facilities such as allotments and sports pitches which would benefit the wider community. <u>Opportunities for community ownership and/or management of such community facilities could be explored.</u> Permeability throughout the site and linking into the existing public rights of way network is strongly encouraged, with particular regard to pedestrian and cycle accessibility.</p>	<p>We recommend the following amendment to the modified text: "should be explored including adoption of the facilities by the Parish Council".</p>
Page 286 @12.237	67	<p>Modifications to paragraph 12.237</p> <p>The design and layout and landscaping of the development will need to have regard to the amenity of residents alongside in relation to any continued use of surrounding areas of land for police functions, <u>including to ensure that their quality of life is not undermined by the fear of crime</u></p>	<p>We welcome that Policy wording incorporates the requirements of NPPF that the PIC planning policy will ensure the quality of life for future and existing residents, including in the surrounding area, is not undermined by the fear of crime.</p> <p>We recommend further adding "The continuing presence of the PIC must be mitigated in terms of its proximity to and screening from adjacent housing, and access arrangements which clearly delineate between the PIC and the residential area."</p>

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Page 288 @ SCLP 12.25	67	<p>Amended Policy SCLP12.25 now reads</p> <p>Suffolk Police HQ, Portal Avenue, Martlesham</p> <p>10.7ha of land at the Suffolk Police Headquarters Site is allocated for the development of approximately 300 dwellings, <u>which is expected to come forward as part of a programme for the re-provision of Police facilities.</u></p> <p>Development will be expected to comply with the following criteria:</p> <ul style="list-style-type: none"> a) Delivery of a high quality, high density residential scheme incorporating flats and mix of residences to meet local needs <u>including provision of properties that would be suitable for older persons;</u> b) Delivery of a distinctive scheme in the wider context of the Martlesham Heath hamlets and the important gaps between them; c) Provision of affordable housing on-site; d) If needed at the time of a planning application, 0.1ha of land on the site should be reserved for a new pre-school setting; e) An archaeological assessment is required; f) A site-specific Flood Risk Assessment is required; g) The mature woodland areas should be retained and be accessible; h) Provision of open space providing opportunities for all ages; i) Provision of allotments which are accessible to residents and the wider community; j) Provision of sports facilities with opportunities for community use; 	<p>We comment on the modifications to this policy as allowed by the consultation. Notwithstanding, we maintain our main objection to the inclusion of this Policy without a Neighbourhood Plan review of alternative uses of this site and without clear justification for the need for housing in this location.</p> <p>We recommend that Council takes account of the proximity of the Western Corridor (which incorporates a Site of Special Scientific Interest), the Deben Estuary, The Local Nature Reserve at Martlesham Common, the Portal Woodlands and Castan Woods.</p> <p>We recommend that Policy 12.25(k) locks in sports provision on-site and does not simply provide funds to redress any loss of sporting provision without addressing the availability (or lack of availability) of local land to host sports provision.</p> <p>We welcome the addition of an Ecology Survey at 12.25(n).</p> <p>We recommend the wording incorporates any newly identified non-heritage assets at SCLP 12.25 (o)</p> <p>We welcome the wording at 12.25 (p) which incorporates the requirements of NPPF that the PIC planning policy will ensure that the quality of life, for future and existing residents, including in the surrounding area, is not undermined by the fear of crime.</p> <p>We recommend the Policy wording at 12.25 (p) adds “The continuing presence of the PIC must be mitigated in terms of its proximity to and screening from adjacent housing, and access arrangements which clearly delineate between the PIC and the residential area.”</p>

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		<p><u>k) Proposals involving the loss of any existing open space, sports and recreational provision will need to demonstrate that such provision is surplus to requirements, that the loss would be replaced by equivalent or better provision in terms of quantity and quality or that the benefits of alternative sports and recreation provision outweigh any loss;</u></p> <p>k) l) <u>l) Significantly enhance permeability through the site and linking into adjacent pedestrian and cycle routes; and</u></p> <p>l) m) <u>m) Provision of an ancillary area of communal workspace supporting social interaction and cohesion;</u></p> <p><u>n) An ecological survey will be required, and any necessary mitigation provided;</u></p> <p><u>o) Design, layout and landscaping to respect the site's close proximity to three Scheduled Monuments, and a Bowl Barrow on site; and</u></p> <p><u>p) Any Police operations retained in use on and/or adjacent to the site will be addressed through scheme design, layout and landscaping, to ensure that the quality of life for future and existing residents, including in the surrounding area, is not undermined by the fear of crime.</u></p>	<p>Is there any opportunity to add to the Policy wording, or at the very least to add to the explanatory wording, a requirement to incorporate innovative design?</p>

APPENDIX A – EXTRACTS FOM THE HABITAT REGULATIONS ASSESSMENT RECOMMENDED FOR INCLUSION IN THE MODIFIED LOCAL PLAN

7.7 The Water Resources Management Plans are refreshed every five years by the water companies, and at the time of preparing the study, both the most up to date versions are not publicly available.

7.10 Policy SCLP 9.7 supports the recommendation within the study for stringent policy wording in relation to new build and water efficiencies.

*7.12 A full list of water treatment plan improvements are listed in the Infrastructure Delivery Plan that forms Appendix B of the Local Plan. It is understood that the infrastructure requirements listed will be continually checked and reviewed and are viewed as necessary for the delivery of the plan. The study recommends early discussions with Anglian Water Services on these matters. With the advice within the study in mind, **this HRA recommends that an annual review of the current situation** and planned works is timed annually to enable meeting outputs to inform the annual monitoring report for the Local Plan. Attendees of this water review group should include both utilities companies, the Environment Agency, Natural England and the Council.*

7.13 It is important to note that where growth is committed to via planning permissions, water utility companies must honour the connection requirements to the water network. These matters cannot therefore be left to the project level for solutions to be sought and must be continually reviewed as part of the Local Plan monitoring. *It is therefore recommended that clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen is required within the Local Plan.*

7.16 Relevant flood risk policies within the Local Plan at Final stage are SCLP 9.5, 9.6 and 9.7. Additionally, supporting text sets out the requirements to address flood risk, including the requirements for development project level flood risk assessments. *It is recommended that supporting text makes specific reference to the need for such assessments to consider impacts on designated sites from flooding*

"it is necessary to establish an annual water review group which should include both utilities companies, the Environment Agency, Natural England and the Council. It is recommended that this is timed annually to enable meeting outputs to inform the annual monitoring report for the Local Plan. The following recommendations are made in relation to text additions within the plan, which will give confidence that matters are continually reviewed and resolved ahead of growth needs: The plan should include a specific commitment to establishing and running an annual water review group, to include both utilities companies, the Environment Agency, Natural England and the Council. The stated purpose should be to ensure that water related matters (both supply and treatment) and required infrastructure upgrades are continually reviewed and resolved ahead of growth needs. It is recommended that clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen is required within the Local Plan, which may be best placed alongside the infrastructure needs table"

APPENDIX B – EXTRACTS FROM THE HABITAT REGULATIONS ASSESSMENT RECOMMENDED FOR INCLUSION IN THE MODIFIED LOCAL PLAN

"It is strongly advised that the biodiversity and geodiversity policy SCLP 10.1 is strengthened to be more reflective of the current focus on biodiversity net gain, which in turn provides a more holistic approach to biodiversity protection and enhancement, recognising the intrinsic links between designated sites and wider biodiversity, and the role that development can play in reversing declines". Suggested additional wording to the RAMSAR paragraph is provided in the HRA as set out below:

Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'. All development should follow a hierarchy of seeking to firstly avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.

Proposals that will have a direct or indirect adverse impact (alone or combined in combination with other plans or projects) on locally recognised designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with comprehensive evidence that the benefits of the proposal, in its particular proposed location, outweigh the biodiversity loss.

New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. New development must also secure ecological enhancements as part of its design and implementation and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal.

Where compensatory habitat is created, it should be of equal or greater size and ecological value than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan.

Where there is reason to suspect the presence of protected, UK or Suffolk Priority species or habitat, applications should be supported by an ecological survey and assessment of appropriate scope undertaken by a suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably.

Any proposal that adversely affects a European site or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission.

Any development with the potential to impact on a Special Protection Area or Special Area for Conservation within or outside of the District will need to be supported by information to inform a Habitat Regulations Assessment.

A Supplementary Planning Document will be prepared to implement a strategic Recreational [Disturbance] Avoidance and Mitigation Strategy in order to mitigate for any potential adverse effects arising from new growth on Special Protection Areas, Ramsar Sites and Special Areas of Conservation. The Council will work with neighbouring authorities and Natural England to develop and implement this strategy. The strategy will include a requirement for developers to make financial contributions towards the provision of strategic mitigation within defined zones