



Martlesham Parish Council

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East Suffolk Council
Planning Policy & Delivery Team
Riverside
4 Canning Road
Lowestoft
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NR33 0EQ

Dear Sir/Madam

Consultation on the Suffolk Coastal Local Plan: Modifications

Thank you for the opportunity to comment on the Main Modifications proposal.

We submit for consideration:

- General comments on the modifications to this Local Plan, and
- A table of specific comments (attached).

Please find our general comments below:

1. The modifications introduce imprecise terms

The Local Plan requires consistency of its use of terms throughout. Examples include:

- 'Mitigation' – Tourism SCLP Policy 6.4 Page 130 says 'mitigates'; elsewhere the phrase is 'adequately mitigates'.
- Impact assessment is used variously: see SCLP 9.1 "without causing any significant adverse impacts" without reference to mitigation, and Policy 10.4 "Significant adverse impact" that "cannot be adequately mitigated".
- 'People' or 'persons'.
- Revisions to legislation should be "as amended" and not 'including subsequent revisions'.
- Revise "not on site" to "offsite".
- 'European sites' and 'European Protected Sites' 'Sites of European importance'

2. The modifications introduce a recurring theme of relaxing controls

There is a general theme of relaxation and a significant weakening of the controls from the version of the Local Plan presented to the Examination – this might permit inappropriate levels of development.

We note the consultation requirement that all responses to the Main Modifications should be restricted to the modifications themselves, as all other matters were considered as part of the

Examination. Notwithstanding, East Suffolk Council has made wider changes than strictly necessary to address the Planning Inspector's notes on some matters. We question on what justification these changes have been made. What are the terms of reference under which East Suffolk Council can make modifications to the draft plan as laid before the Planning Inspector in Examination?

Regarding the removal of Areas Protected from Development not covered by Neighbourhood Plans, the justification for their removal should be made on a case by case basis with full community engagement. We object to the blanket removal of this policy.

3. Modifications to SCLP 12.25 (Constabulary Headquarters)

We object 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 at this location.

4. Consultation during the Coronavirus pandemic

In the Inspector's Letter to the District Council (J58), we note the Inspector wrote:

"If the consultation proceeds, it may be that during the consultation it becomes apparent that there is disadvantage taking place and the process would need to be changed and mitigation put into place, or the consultation suspended until a time when the disadvantage can be addressed."

The consultation response process could be considered prejudicial to the socially isolated and those with limited access to computer systems. We say this because we emailed the Council asking for hard copy consultation documents. We received the following which arrived by post free of charge:

- Schedule of Proposed Additional Modifications
- Schedule of Proposed Policies Maps
- Schedule of Proposed Main modification
- Reply Form to complete (parts A and B)

We did NOT receive:

- The Habitats Regulations Assessment
- The Sustainability Appraisal
- A copy of the tracked changes Final Draft Local Plan

Whilst each modification has been provided, they are difficult to read in isolation (i.e. without the full tracked changes version) as the context has been removed.

Thank you for taking these comments into consideration.

Please do not hesitate to contact us should you require clarification on any matter raised in this letter.

Yours faithfully

S C Robertson

Susan Robertson
Clerk

Enc

Cc: Annette Feeney, Programme Officer
Martlesham County & District Council ward members