

16<sup>th</sup> November, 2009

East of England Plan Review,  
East of England Regional Assembly,  
Flempton House,  
Flempton,  
Bury St. Edmunds,  
Suffolk IP28 6EG

Dear Sirs,

**East of England Plan - 2031**  
**Scenarios for housing and economic growth**

1 Introduction

- 1.1 The Suffolk Preservation Society (SPS) is the County Branch for the Campaign to Protect Rural England (CPRE), with a membership of around 2,000, including 131 parish councils and 39 amenity societies. Whilst the SPS confines its comments to Suffolk, which is its remit, this should not be interpreted as approval for unsustainable development in neighbouring counties.
- 1.2 The SPS appreciates, as one of the key environmental groups in the County, this early opportunity to input in to the East of England Plan Review. The following comments are based on the SPS's experience of what is taking place in Suffolk, and the comments it receives from its Members, affiliated town and parish councils, local amenity societies, environmental issue groups, and the public.
- 1.3 The SPS supports the Assembly's concern that "*the delivery of the current Plan cannot be achieved without Government commitments to investment in infrastructure of all kinds, both to redress current deficits and to support new growth.*"
- 1.4 References in this document are to the Consultation Document of September 2009.

2 Section 3. Possible growth scenarios for the East of England Region

- 2.1 Section 3.1 It is accepted that populations grow, and that migration into the county will continue to evolve from London and from the rest of the UK, but this type of growth (organic) is very different from planning for economic growth. To plan to encourage growth in excess of what can be holistically

absorbed, and which becomes self-perpetuating should be examined carefully. Many of the points made in the Vision and objectives statement at 5. Objectives (i) are correct in themselves, but they are objectives made in isolation of the wider objectives of carbon reduction and world sustainability.

- 2.2 Huge amounts of energy go into house building, and huge amounts of waste from the building industry go to land-fill or to incineration. Huge amounts of water are required to service housing and sewage facilities, and huge amounts of energy resources and infrastructure are needed to support new development. While many eco-build developments do improve on the use of energy resources and materials, and are the way forward on sustainable house development, *building eco-build developments in huge quantities, for whatever reason, will not make the planet more sustainable.*
- 2.3 Section 3.5. It appears contrary to climate concerns and sustainable living that housing and employment are linked to drive growth. Linking jobs with housing, if one creates the other, is unsustainable. It is especially damaging in a rural context, as the two are quite separate issues. Some areas may lack jobs, but have housing and vice versa, although the evidence in Suffolk, at present, is that they are reasonably balanced, although with some pockets of deprivation. Rural employment often attracts a lower income base, although it may give other quality of life benefits. There is a significant lack of housing for rent or shared equity.
- 2.4 When considering scenarios for growth it is important to look at the topography of Suffolk which has a seaport, Felixstowe, on an eroding coastline but with important geo-diversity - Ramsar sites, county wildlife sites, nature reserves and sites of special scientific interest. There is heath and woodland, river valleys and flood plain, farm land for growing food, pasture for livestock, designated countryside including two Areas of Outstanding Natural Beauty, special landscape areas and small scattered housing patterns, (except for two main population centres, Bury St. Edmunds and Ipswich), and a rural tourist economy. It is also a holiday and retirement destination. Consideration needs to be given to all of these factors.
- 2.5 Suffolk has a distinct identity, like many counties. It is celebrated nationally and internationally for valued landscape qualities and historic market towns, attractive villages and scattered farming hamlets. These assets should continue to be valued for future generations to enjoy: there is great economic and social benefit in doing so. Unsustainable policies have the ability to destroy this for all time. Government planning needs to reflect what land-use can reasonably absorb by giving equal weight to other policy obligations, ie: carbon reduction, the availability of resources, the protection of the environment - and integrate them. If one of the policies is given greater weight then the balance is distorted, resulting in unsustainable outcomes.

- 2.6 The requirement is to balance different factors, not only in the south east, but across the whole of the country. Large tranches of spatial development centred around London and the South East and the East of England might give short term economic reward, but ultimately will bring long-term difficulties, deterioration of environments and social problems. The assets of the county will have been lost. These assets belong to everyone, and most people have high regard for them and what they offer in terms of peace, relaxation and beauty.
- 2.7 As stated at 3.1, extra pressure for growth comes from the Government's economic policy of inward migration from overseas into London and the knock-on effect that it has on housing provision in London and the South East and the East of England. Whilst the planning role will need to assess this, there are serious implications, evident from the irreconcilable conflicting guidance in planning documents in respect of climate concerns and sustainability vis-à-vis pressure for over-zealous economic growth at the cost of everything else. One set of planning guidelines cannot be carried out in isolation from other important policies. They need to be integrated in a sustainable way, otherwise climate concerns will be given lip-service only, and the spiralling carbon-generated problems will increase.
- 2.8 Where housing development is needed, then it should be concentrated around the larger towns in Suffolk, first using previously-developed land. In Suffolk in 2006-7 sixty-one per cent of all housing completions were on previously developed land, with Ipswich on the highest level.
- 2.9 Contrary to what is stated in section 3.7, the level of house prices *should not* be used as an economic lever to build more houses in order to bring down the cost of homes. This is an unsustainable and unsound way of planning for the future housing needs of the county, and appears to make little difference to house prices in practice. While an imbalance in supply and demand for houses can affect their price, it is not the only factor influencing the cost of market housing.
- 2.10 Section 3.12: Expanding development out of the larger centres, such as Ipswich, into adjoining planning districts, would run mainly into open countryside. It is important that the built envelope is not breached so as to impact on the surrounding coast and countryside. There may be pockets where some development is feasible, but both Ipswich and Bury St. Edmunds are towns placed in a mainly rural landscape. In sustainable terms it is right that the distribution of growth is concentrated at the two population centres, as these are employment hubs.

### 3 Scenario 1: Roll forward of existing Plan

- 3.1 Scenario 1 in section 3.13 will roll forward the number of existing planned houses with changes agreed by local authorities. It seeks to build 64,300

*additional* dwellings in Suffolk by 2031. For a rural county like Suffolk with its topography (as already discussed), and with social and economic benefit in retaining its individual character, Scenario 1 is possible but challenging but would, if implemented, change the character of Suffolk.

- 3.2 The ability of Suffolk's environment continually to absorb the building rates of the last 20 to 30 years, *ad infinitum*, has not been properly assessed in terms of environmental consequences, limits and capacity. In view of the seriousness of this situation, future growth scenarios need to reflect these concerns and a *lower growth rate* needs to be adopted.

#### 4 Scenario 2: National housing advice and regional new settlements

- 4.1 Scenario 2 in section 3.17, while concentrating growth on population and employment hubs, will give Ipswich an increase in housing of around 2,100 and Bury St. Edmunds 2,000. Both are country market boroughs: Bury amid rolling countryside and Ipswich on the River Orwell. It would be difficult to absorb this quantity of housing without spreading into the open countryside and encroaching on important designated areas of protection. There is a danger of attractive towns turning in to urban conurbations. SPS also agrees with 4.8 that Scenario 2 will increase and lengthen commuting patterns to London as a result of the housing growth and that new town settlements, or large extensions to towns, given the spatial pattern of existing development hubs, will attract resources and investments away from those that already require repair of infrastructure and additional resources.

#### 5 Scenario 3: National housing advice and regional economic forecasts

- 5.1 This scenario's approach in section 3.21 is different, as it looks at the potential to increase employment, driving housing demand, and to spread the employment base. Some parts of Suffolk are less economically strong: Lowestoft and Ipswich have received some regeneration. The landscape attracts that to which it is suited: farming, small businesses, working from home, countryside leisure pursuits and heritage coast tourism. Much of the land produces important food crops such as cereals, vegetables and fruit, and by-products from the landscape. It supports specialist animal stock producers and has a thriving local food chain. It provides sport and leisure recreation, and tourism - it is a country cottage and coast destination for visitors, and these represent some of its economic and employment opportunities.
- 5.2 It would seem more appropriate for an area like Suffolk to receive support for small business enterprise through direct assistance, as provided in the past by the *Council for Small Industries in Rural Areas*. To give more help to the farming and tourist industry, rather than impose business regeneration to attract

more housing to meet the Government's unsustainable housing policy would be a way forward. The predicted forecast for "longer term economic stagnation or decline" in some areas of Suffolk is likely to be because of poor transport facilities and access to services, like GPs, general stores, pubs, post offices and primary schools. Important service networks are essential and this highlights the urgency of maintaining them. The County would be best served if it could decide for itself where the housing and support were needed most and create an organic supply of growth.

6 Scenario 4: National household projections

- 6.1 Section 3.24 requires about 33,700 more new dwellings a year across the region, and implies a further 150,000 homes over a roll-forward of the Plan, and a further increase in the need to generate additional jobs. This is based on future migration trends based on past policy decisions, but as stated these figures need to be understood, as they have been used by past independent panels that have tested regional plans. These are based on new household projections and see extensive migration into Suffolk and Norfolk and would need to be matched with employment. There would be significant increases in all the Districts, apart from Ipswich. The scale of these increases is most serious and damaging, as the 33,700 additional dwelling envisaged are the highest of all scenarios. These figures just roll off the page but in reality it would be like *doubling* the built environment of Suffolk.

7 Question 1

- 7.1 Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?
- 7.2 **No. There is not any scenario which gives a lower growth rate to bring growth in line with other factors to provide for sustainable integrated policies, going forward, to combat climate concerns.**

8 Question 2

- 8.1 Do you have any comments on the four growth scenarios?
- 8.2 **They are all, in different degrees and different ways, damaging to a rural county.**

9 Question 3

- 9.1 What is your preferred growth scenario and why?
- 9.2 **None of these because they are all damaging to the rural fabric of Suffolk, and to climate concerns, and do not reflect a sustainable approach.**

- 10      Section 4. A regional overview of the impact of the scenarios
- 10.1      “The Assembly needs to test the impact of the scenarios on a range of social, economic and environmental factors in the Region. The effects of climate change up to and beyond 2031 must also be considered.”
- 10.2      **What does climate change mean for the scenarios?**
- 10.2.1      Section 4.2 states that there are two aspects to be considered in respect of climate change: *mitigation* (reducing greenhouse gas emissions to limit the effects of climate change); and *adaptation* (the changes necessary to cope with the climate changes that will happen). These are, of course, necessary as part of the process of helping to reduce the effects of damaging changes of unbalance in the world, created by human activity, releasing too much carbon dioxide and other gases in to the atmosphere. ‘Mitigation’ and ‘adaptation’ run through Government planning policy, however, they elude the most important factor - *the principle of too much building development in the first place* and how it is planned and monitored. This Consultation is a good example of how this point will be tested and acted upon.
- 10.2.2      Section 4.3 ‘Mitigation’ admits that if we build more we will create more emissions, and use more resources but it attempts to offset this by claiming that it will “*bring opportunities to invest in new ways of doing things, such as zero-carbon homes and renewable energy.*” Let’s be clear: this sounds as if the zero-carbon homes will cancel out the additional energy used in building new dwellings - more development of whatever type will not help to reduce world carbon levels because we will still be building at unsustainable levels and consuming more natural resources. If all carbon-neutral energy resources were to be brought on line today it would not be sufficient for today’s present consumption: society is energy-hungry.
- 10.2.3      We will all, of course, have to adapt to changes brought about by climate considerations. However the key point is how we can work to *reduce* our present rate of consumption.
- 10.2.4      *Reduction* is the key, both in terms of use and in providing a range of alternative renewable resources, and in investment in advanced nuclear technology to plug the energy vacuum until we have total renewable energy support and are living within our carbon footprint. *Mitigation should come after reduction.* We need to re-assess the model for economic growth linked to unsustainable building development to try to reduce the escalating carbon damage, waste and water proliferation and drain on energy resources that come with it. This does not mean that we cannot move forward, or be economically sound, but it does mean doing things differently, and re-evaluating what it is that gives people a quality of life, and whether the economic policies of government can deliver it.

- 10.2.5 Section 4.4 is an important and controversial matter, particularly for those living and working on the coast, in the river valleys and adjoining flood plains. As an eastern coastal county, Suffolk is very vulnerable. Through the Defra Pathfinders scheme, with local authorities and stakeholders, some work is being done to assess the problems as the coastal landscape is particularly at risk, and in places is eroding fast. There are land slips and serious incursions from the sea already, with homes and farms being put at risk, and fresh water marsh becoming salt water marsh. Coastal dwellers are needing to confront a move away from the coastline. The Pathfinders approach is one of keeping development away from the coast and trying to reduce building on or near it, without leaving it to fail. It is about support for some of what is there, and steering future development away from it. SPS, having engaged in the Defra Consultation on Coastal Erosion, is in no doubt that development along the lines of Scenario 4 would not be sensible, or even possible.
- 10.2.6 Much of the county in the east is affected by flood plain and any future building development needs to be steered away from it, because it has been shown that putting in more infrastructure only exacerbates the flooding problem in other nearby places.
- 10.2.7 Section 4.5 refers to water supply, which is a crucial matter for Suffolk, and well as elsewhere. In participating in the Consultation for the Waste Core Strategy for Suffolk, the SPS had to take into account the Environment Agency's advice that most of Suffolk overlies a major aquifer which provides most of the drinking water for the county. This final consultation document will ask for protection for vulnerable aquifers and for development not to impact on them. This seems advice of crucial importance. The Environment Agency and the water industry, with local authorities and other stakeholders, when developing an integrated approach to the management of the water environment will need to re-assess water concerns in the light of the different Scenarios.
- 10.2.8 Building development inevitably creates hard surfaces, and although more work is being done to prevent this, it still means that rain water is directed to drainage as waste water, instead of to the aquifers. This does not help maintain the drinking water supply of the county.
- 10.3 **What do the scenarios mean for the regional economy and employment?**
- 10.3.1 There are three issues for the economy: supporting a sustainable economy; meeting economic regeneration needs; and aligning the growth of jobs to local workers to prevent longer commuting patterns.
- 10.3.2 This section appears to assume that people will always travel to growth centres and to London for work, as probably many do now, but there is an increasing move for people to work from home, if not all of the days of the week, some of them. With advanced communications technology coupled with policies to encourage this, there could be a considerable reduction in the movement of

people across Suffolk to London or elsewhere. This, to a degree, is already happening in Suffolk, and is a sustainable way forward. Also more people working in their local rural environment could mean a more vibrant local economy, using the services that exist to their full potential and encouraging even more diverse local activity. With climate concerns there needs to be a new approach to work and travel patterns, reducing unnecessary use car and using other forms of transport where possible, and at the same time supporting the local rural community.

10.4 **What do the scenarios mean for affordability and affordable housing?**

10.4.1 As already stated, it is not sustainable or necessarily achievable to link flooding the market with housing to reduce house prices. It has been shown not to work, and this is a much more complex market which needs to include other factors, which are variable. There is a need for *county-based* target setting for housing which plans for the needs of its locality based on organic growth. This would be a sustainable way forward.

10.4.2 The method by which 'affordable' (rent or shared equity) homes are delivered within the main planning system is not a serious way of providing the number of homes for rent that are needed, and the process is in the control of the house builders and developers. In Suffolk, the monitoring report for 2006-7 showed that the number of dwellings completed decreased slightly (613 down to 571), after a dramatic increase in the previous period. Affordable homes built on 'exception sites' often 'steal' valuable amenity land from small village communities, and distort the figures for affordable housing rates. Homes for rent need to be part of mainstream planning, and properly planned for. Rented homes are needed now, and many more people would prefer to rent, especially when they are young: this should be seen as a standard available option, not one of last resort.

10.4.3 The County Council in Suffolk needs to be able to decide how much housing, both market and rented stock, is required for their locality. Housing should be built where it is needed most, and only as much as is needed, on a planned basis, and within the confines of planning controls. Local communities should advise on this process.

10.5 **What do the scenarios mean for rural areas?**

10.5.1 Whilst housing, (usually rented), is needed in some rural villages it is not needed in *all* villages. This has been demonstrated through the affordable housing questionnaires to villages. This aspect needs to be looked at sensitively otherwise it has the potential to unbalance and have an adverse impact on small communities. Organic growth over time to enable small country areas to survive, but not become swamped, should prevail if that is what those communities consider is right for them, but delivered within appropriate planning controls. It is not clear in section 4.14 whether it is referring to 'affordable' housing or market housing. Market housing in rural areas is not

usually easily assimilated, because of the number of houses required to make a profitable venture for a developer, and the pattern of rural settlements. Rural areas require organic housing growth, sensitively located.

10.5.2 Large scale growth in rural areas, not just in Suffolk, would take planners back to pre-1947 planning practises, which would be a retrograde step. The success of the planning system since then and up until 2004 was the move to retain the rural areas and build on to the built-up areas thereby regenerating the towns and retaining the countryside and small building patterns in the landscape for everyone to continue to appreciate. This policy has been the envy of other countries where they have failed to do this.

10.6 **What do the scenarios mean for areas in need of regeneration?**

10.6.1 To a degree this has been covered under 'regional economy and employment'. However, section 4.17 misses the point that it will be impossible to promote growth on the Suffolk coast, because of the nature of the landscape, coastal erosion and the move to discourage development there. Large towns and some infrastructure on the coast will continue to be supported but it is less likely to attract the sort of business investment envisaged by Scenario 4.

10.7 **What do the scenarios mean for land availability?**

10.7.1 The policy of reusing previously-developed land is a sustainable one, and should be continued. Suffolk does not have *greenbelt* because it is a rural county. It does have, however, nationally and locally important land designations, including two areas of outstanding natural beauty. The coastline is mainly protected by designation as mentioned at our 2.4, (Ramsar and SSSI sites and AONB Heritage Coast), and work has been undertaken by the Environment Agency and Natural England in preparing Shoreline Management Plans to protect and manage the interests and problems of the area. Suffolk contains a wide range of nationally and locally important ecological sites, including 144 Sites of Special Scientific Interest, 900 County Wildlife Sites and 39 Local Nature Reserves, as stated in the Monitoring Report for 2006-7.

10.7.2 SPS considers that whether land is *greenbelt* or 'designated' land both categories are equally important in the function for which they were derived and should continue to be supported, up-graded and protected.

10.8 **What do the scenarios mean for areas of flood risk?**

10.8.1 Section 4.20 is noted. The Defra Pathfinders Consultation outcome will be of interest and give additional information here.

10.8.2 Section 4.21 refers to Scenario 4, which allocates significant levels of growth in coastal districts, and even if associated with existing settlements, does not appear to be sensible or economically viable.

10.9 **What do the scenarios mean for transport?**

- 10.9.1 We have not only an unsustainable transport system but also an unsustainable distribution network system. Transport is difficult for Suffolk because it is a rural county where a car is required as a necessity, because of a lack of viable transport in some areas, mainly because of its lightly scattered settlement and landscape patterns. Except for the population hubs, this landscape, with its minor road networks, are the character of the county, rather like Devon and Cornwall. It is the landscape that dictated and informed this character. As already mentioned, however, more people do work from home and people working in London often stay overnight, or all week.
- 10.9.2 Whilst it is sustainable and desirable to place housing and employment together, it does not follow that people will work locally but may prefer to work elsewhere, or have no choice but to work in London or elsewhere because of the nature of their employment, and ultimately what they wish to do.
- 10.9.3 What is noticeable in Suffolk is that the distribution network of food and goods, transported across the country, has an impact on the county's roads. Suffolk has a potentially thriving local food network to be proud of, and, if not driven out by the big supermarkets, does much to help the local economy, keeps local people working locally, creates vitality in the countryside, helps to support good food habits and reduces the need to travel, both for livestock and people. It is a sustainable way forward. At the moment, the country's big supermarkets are dictating food distribution and transportation. It is completely unsustainable to send food products, like Brussels sprouts grown in East Anglia, to Poland for trimming to return to Suffolk to be sold locally. Neither is it sensible for large transporters to negotiate narrow country lanes. The large transporters emerging from the A14 and A12, and elsewhere in Suffolk contribute to the county transport problems, and congestion on minor roads.
- 10.10 **Carbon emission**
- 10.10.1 All future building, even eco-build, and transport of whatever kind will continue to contribute to carbon dioxide levels unless there is a complete shift in technologies and methodologies, which will be difficult to achieve in the short term. However, the most sustainable route always needs to be sought. This will be best achieved by re-examining the policies that guide the Plan.
- 10.11 **What do the scenarios mean for air quality?**
- 10.11.1 In the light of the foregoing, and the uncertain nature of future air travel at the same, or increased level of use, Stansted Airport expansion (section 4.28 refers) and the growth around it, expanding in to Suffolk, should be re-assessed. Over-flying of the county, particularly over the areas of outstanding natural beauty, and the tranquil parts of the county have caused residents to object strongly to over-flying patterns because of the frequency of planes and the noise levels which attend them. It had not been recognised by the Inspector, at the Stansted Inquiry, that the activities at Stansted had had such knock-on effects in to Suffolk. Pollution from air and road traffic, it is understood, is one of the

largest contributors to carbon dioxide levels and evidence has shown that it can cause ill-health to those who have to live near to congested road networks. Work is also being carried out on the effects of noise levels caused by air and road traffic, particularly with regard to schools, both teachers and children.

10.12 **What do the scenarios mean for waste?**

10.12.1 As already mentioned demolition and building waste is one of the highest contributors to waste disposal. Suffolk also receives 12% of London's waste. It is a huge and growing problem and will be exacerbated by additional people and businesses to the region. The more building development required, the more flushing of toilets, accumulation of rubbish, and waste disposal requirements needed.

10.12.2 SPS has participated in the consultation process for the Waste Core Strategy for Suffolk and is well aware of the unsustainable nature of waste. It has indicated its preference for *reduction at source* from all of us but particularly from industry, and a hierarchy of sustainable disposal routes, starting with reduction and re-use, followed by recycling, green composting, anaerobic digestion plant with incineration, and finally landfill and landraise as the last resort. Disposal routes all have their problems too numerous to lay out here but landfill is nearly complete in Suffolk, and landraise will be damaging to the landscape. Incineration burns everything and has some future energy transference input in to the national grid, but it produces high carbon emissions. Once again, the most sustainable route needs to be followed possibly locating small plants spread to wider locations, and where they are needed most to reduce transportation of waste material.

10.13 **What do the scenarios mean for water resources and quality?**

10.13.1 As stated, higher levels of growth will place greater stress on the region's scarce water resources and this is certainly the case in Suffolk. As already mentioned, a drinking water aquifer lies under large parts of the county, and it is important that this is not leached or tainted through development. Although a wonderful food-growing area, and this is part of Suffolk's economy, it is one of the driest places in the country, much of the soil is sandy and drains very quickly. Crop irrigation has become more common-place in recent years. It is important to safeguard the area, and its water, for the food supply chain.

10.14 **What do the scenarios mean for biodiversity?**

10.14.1 As section 4.33 points out, growth affects biodiversity in many ways, either by impacting directly on its area or by fragmenting its habitat. Suffolk is rich in biodiversity, and the county regularly deals with planning applications which affect habitats and although safeguarding conditions are placed on permissions, at this stage it is usually too late to save the species as the principle of building has been given. For some species *mitigation* is not possible, as they are unique to their site.

10.15 **What do the scenarios mean for the historic environment?**

10.15.1 Sections 4.38 to 4.40 covers the large historic settlements that could come under significant development impact pressure whereby the historic context is diminished. Continuing in this vein will further encroach on valued historic fabric, especially if draft PPS15 is adopted in its present form, which will no longer be able to safeguard Grade II buildings, or parts of conservation areas, and will be able to replace a historic building if it believes an eco-build will be more sustainable.

10.15.2 The effects of development pressure on small historic market towns and villages will be even more devastating. Small changes can quickly erode any historic setting but it does so much more dramatically when directed on to the smaller scale environments.

10.16 **What do the scenarios mean for landscape character?**

10.16.1 One of Suffolk's most important features is its landscape character. Section 4.44 mentions the potential for growth at some of the region's most sensitive landscapes, which includes the Suffolk Heritage Coast, which under Scenario 4 would be difficult to achieve as well as destructive to the area. The housing development scenarios for the county, with different levels of degree, are not just damaging but are likely to destroy the landscape character of the county for all time.

11 Question 4

11.1 Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?

11.2 The following are relevant points.

11.2.1 It is essential to safeguard the country's future food chain supply. A sustainable future with food security will need to ensure that it can adequately feed its population in the light of climate concerns. Farming land, pasture and orchards must be safeguarded for the future needs of the county. It should be asked whether the proposed building development impact scenarios on the county reduces its ability to continue to supply the food chain?

11.2.1.1 In connection with this it is important to examine the role of the largest supermarkets that appear to *control* food distribution in this country and the knock-on effects that this brings to road haulage movements. Do the large supermarkets impact on the region's ability to control its food supply and deliver it in a sustainable way?

11.2.2 If the region is to become sustainable it will be necessary to address the question of capacity limits. What quantity of development can a region absorb, in sustainable terms, without detriment to the planet and those who come after?

11.2.3 A key element to re-assess is *reduction* before *mitigation* in respect of climate concerns. National policies will need to strengthen and integrate their policies in respect of carbon footprint reduction and an about-turn on some areas of policy will be required. Has consideration been given to capacity limits and what scenarios evolve from these?

12 Questions 5 and 6

12.1 The foregoing will inform the answers to these questions.

12.2 SPS would add that the implications of the Overall Spatial Vision of the Plan at May 2008 needs to be explained to the public in terms of what it will do to their environment and the changes that it will bring, and ask them for a mandate to proceed with it. The objectives are aimed at economic development which is assumed will give a 'good quality of life', but it may not be realised what this is likely to deliver in real terms to people's living environment, and whether they consider this is the 'quality of life' they would prefer.

Thank you for taking our views into account. The SPS asks to be kept informed on the Consultation process.

Yours faithfully,

Linda Clapham

cc: SPS Trustees/Executive  
SPS Planning Transport & Countryside Group  
Suffolk MPs  
SPS website – for town & parish councils  
Suffolk View – for website route  
Media