

18 February 2019

## **Suffolk Coastal Final Draft Local Plan, February 2019, Public Consultation**

Having reviewed the final draft local plan policy documents, the Society has the following comments on the Site Specific Allocations and District Wide Strategic Planning Policies. These follow on from our response to the First Draft consultation in 2018. Representations at this stage should be limited to the legal and procedural compliance of the Suffolk Coastal Local Plan, the soundness of the Local Plan, its legal compliance and whether the Local Plan is in conformity with the Duty to Co-operate. On this basis SPS has submitted representations on the Suffolk Coastal draft plan on the following points:

### **Site Specific Allocations:**

The Society restricted its comments on the First Draft to sites which were not allocated in the Site Allocations and Area Specific Policies Development Plan (adopted January 2017). We have the following further comments on the Final Draft on the sites covered at the previous stage:

**SCLP12.29** – South Saxmundham Garden Neighbourhood – we welcome the change since the first draft that the mixed use development is to be restricted to the west of the railway line – retaining open space on ‘the Layers’ to the east. We also welcome that policy SCLP12.29 now includes reference to the Conservation Area, heritage assets, and views of the sensitive landscape and heritage setting to the east, as informed by a heritage impact assessment, feeding into the masterplan. However the policy list of issues informing the masterplan still does not include the requirement to avoid coalescence with Benhall to the south despite reference to this in Para 12.288 and policy SCLP10.5 Settlement Coalescence which sets out a district wide authority to avoid development causing the coalescence of settlements.

**SCLP12.XX** – Brandeston – *This is a prominent gateway site which abuts the conservation area has been removed from the Final Draft Plan. No further comment.*

**SCLP12.52** – Grundisburgh - SPS objected to the site proposed in the First Draft Plan. This has been removed and a new site on Chapel Road for 70 dwellings inserted into the Final Plan. SPS object to the unsustainable location of the new site due to the inadequate road access. Furthermore SPS questions the legal compliance of introducing a new site at this stage which is contrary to The Council’s Statement of Community Involvement (SCI) which sets out the Council’s strategy for involving the community in the preparation and revision of planning policy documents (including the Local Plan).

**SCLP12.XX** - Otley – *the site for 20 dwellings which does not relate well to the existing village has been removed from the Final Draft Plan. No further comment.*

## **District Wide Strategic Planning Policies:**

*SCLP11.5 – Conservation Areas – according to our comment the policy has been amended to specify that it applies to development within a conservation area or its setting. No further comment.*

**Enabling Development** –paras. 3.71 to 3.73 set out the council's stance with regard 'enabling development' whereby an exception to planning policy is permitted in order to allow for development that will provide sufficient public benefit such as retaining a heritage asset, enhancement of sports facilities, coastal defences and flood adaptation measures. We continue to object to this definition of enabling development as it is not supported within the National Planning Policy Framework which defines enabling development solely in terms of its benefit to heritage assets and does not extend to other public benefits (paras 79 and 202). We therefore continue to question the soundness of this policy as it does not comply with National Policy.

**Policy SCLP10.4 Landscape Character** – we welcome the change to the wording that gives particular importance to conserving and enhancing the AONB. However we remain disappointed that the policy is overly permissive and therefore consider that an appropriate separate policy for development within AONB landscapes is required.

The policy refers to Suffolk Coastal Landscape Character Assessment 2018 and the Settlement Sensitivity Assessment (2018) but does not reference the AONB Management Plan 2018 within the policy which is a material consideration. Accordingly we question whether this policy is justified.

***Policy SCLP11.3: Historic Environment** – the policy has been amended and now incorporates a more positive strategy for the protection and enhancement of the District's heritage assets in line with our comments on the First Draft Plan. No further comment.*