



Suffolk County Council (20049304)

Answers to Examining Authority's First Written Questions (ExQ1)

Five Estuaries (EN010115)

Deadline 2

22 October 2024

Table of Contents

1	Glossary of Acronyms.....	2
2	Purpose of this Submission	2
3	Answers to Examining Authority’s First Written Questions (ExQ1).....	3
	General and Cross-topic questions (GC).....	3
	Terrestrial Transport and Traffic (TT)	15

1 Glossary of Acronyms

<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>LPA</i>	<i>Local Planning Authority</i>
<i>SCLP</i>	<i>Suffolk Coastal Local Plan</i>
<i>DVAONB</i>	<i>Dedham Vale Area of Outstanding Natural Beauty</i>
<i>OSSES</i>	<i>Outline Skills and Employment Strategy</i>
<i>OCTMP</i>	<i>Outline Construction Traffic Management Plan</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>“The Council” / “SCC” refers to Suffolk County Council</i>	

2 Purpose of this Submission

This document has been prepared by Suffolk County Council in response to the Examining Authority’s First Written Questions (ExQ1) and is based on a template provided by the Planning Inspectorate case team. For ease of use, questions which are not addressed to Suffolk County Council have been deleted and where another authority is the Lead Authority, this has been attributed. Examination Library references have been used throughout to assist readers.

3 Answers to Examining Authority’s First Written Questions (ExQ1)

	Question to:	Question	Local Authority Answer
General and Cross-topic questions (GC)			
GC.1.01	Local Planning Authorities (LPAs)	<p>Development Plan policies</p> <p>Confirm whether you are content with the Applicant’s policy analysis. The local planning authorities in responding to this question should also advise on whether there have been any changes to the Development Plan operative in their respective areas following the submission of the Application for the Proposed Development and/or as to whether any changes are anticipated prior to 17 March 2025 the latest date by which the Examination must be completed.</p>	<p>When it comes to the Applicant’s visual assessment of the onshore substation, there are several local policies, such as Policy LP17 and Policy LP18 (Babergh and Mid Suffolk Joint Local Plan, Appendix F) which require the Applicant to assess cumulative impacts from a landscape and visual perspective. The Applicant has not yet assessed the cumulative impact of the scheme with the pylons from the Norwich to Tilbury project on the Dedham Vale Area of Outstanding Natural Beauty (DVAONB), so completing that should be a priority for the Applicant.</p> <p>In paragraphs 7.9 and 7.22 of its LIR, SCC mentions some possible impacts to Orford Ness because of the Applicant’s construction activities for the compensatory area. The mitigation and clarification SCC is asking for on the issue of parking is supported by Policy SCLP7.2 of East Suffolk Council’s Suffolk Coastal Local Plan (Appendix G). This policy promotes suitable off-road parking to mitigate impacts of projects on local communities and prospective visitors. Therefore, as in its LIR, SCC requests clarification on the logistical</p>

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details of these works to ensure that they comply with this policy.

As highlighted in SCC’s LIR in paragraphs 8.39 and 8.40, there is an absence of reference to Suffolk policy in the Outline Skills and Employment Strategy (OSES). Such policies include Policy SCLP3.4 (Appendix G), and Policies LP09 and SP05 (Appendix F). The policies in Suffolk’s Development Plans relating to economic development, skills and employment should be explored by the Applicant so that SCC can be satisfied that the Applicant has adequately considered them and intends on carrying out an adequate level of relevant activities in Suffolk. SCC argues that this is an important point because the OSES is currently vague on substantive details, especially concerning the locations of the suggested activities. Therefore, SCC wants to be assured that Suffolk will be treated as a priority, rather than an afterthought, when it comes to skills and employment. More detail on SCC’s current opinion of the OSES, and what it expects in terms of skills and employment, can be found in section 8 of its LIR.

As detailed in its response to question GC.1.12, SCC does not believe that the Applicant has adequately considered other Nationally Significant Infrastructure Projects (NSIPs) in some of its cumulative assessments. This point is not only supported by national policy, but also

	Question to:	Question	Local Authority Answer
			by Policy LP29 (Appendix F), Policy SCLP7.1 (Appendix G) and Policy SCLP3.4 (Appendix G) for other impacts.
GC.1.02	LPAs	<p>Neighbourhood Plans</p> <p>Are there any relevant made or emerging neighbourhood plans that the ExA should be aware of? If there are, please:</p> <ul style="list-style-type: none"> a) Provide details, confirming their status and, if they are emerging, the expected timescales for their making. b) Provide copies of the relevant parts of any made plan or emerging plan. <p>Indicate what weight it is considered the ExA should give to these documents.</p>	<p>As a general point about the weight to be given to neighbourhood plans, SCC would note that they are part of the local development plan framework in much the same way as a district council’s local plan is, or indeed a county council’s minerals and waste local plan.</p> <p>However, as the ExA will be aware, the local development plan does not have direct application to the Planning Act 2008 (“PA 2008”) regime. Section 38 of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”), which imposes the requirement for determinations to be made in accordance with the development plan, only applies to determinations made under ‘the planning Acts’, which as defined in section 117, does not include the Planning Act 2008.</p> <p>The Planning Act 2008 does not directly refer to the development plan (except in relation to amendments to the PCPA 2004, which are irrelevant to NSIPs).</p> <p>However, the development plan could be considered to be matters which are both important and relevant for the purposes of section 104 of the Planning Act 2004. The extent to which the development plan, including neighbourhood plans, will be important and</p>

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relevant will be a matter of planning judgement. The decision-maker is likely to have to consider (among other issues) the degree to which the specific policy addresses the issues of the present case, the extent to which they are in conflict with the National Policy Statements, and how up-to-date they are.

Below is a summary of relevant neighbourhood plans in Suffolk:

Southwold Neighbourhood Plan 2020-2039, made 23rd February 2022

The relevant parts of Southwold's neighbourhood plan are attached in Appendix A to this document. These parts include Policy SWD6 and supporting text which focuses on the protection of the national landscape and the distinctive character the surrounding landscape gives to Southwold. These policies and objectives may be impacted by the offshore part of this project. As demonstrated by the Applicant's viewpoints from Southwold – Gun Hill [APP-204] and Southwold Pier [APP-219], turbines from this project, and those of other projects, will be visible from Southwold at certain levels of visibility.

Reydon Neighbourhood Plan 2019-2036, made 26th May 2021

The relevant parts of Reydon's neighbourhood plan are attached to this document in Appendix

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B. These parts cover Key Issue 2: Protecting the Countryside Around the Village, including Policy RNP 5 and the supporting text. This policy also promotes protecting the natural beauty and special qualities of the national landscape and encourages projects to enhance these features. This policy is deemed to apply to the project due to the fact that this project's offshore activities

Aldringham cum Thorpe Neighbourhood Plan 2018-2036, Pre-Submission Version, October 2024

The status of this neighbourhood plan is currently emerging and in the pre-submission phase, with a referendum expected in the winter of 2025/26. A diagram of the projected timescale for this plan to made is included in Appendix C, which also includes the parts of the draft plan relevant to this project. Policy ACT4 requires mitigation and compensatory actions where relevant to deal with the impacts of major energy infrastructure. Policy ACT5 aims to protect the character of landscape in the area, including the national landscape

East Bergholt Neighbourhood Plan 2015-2030, made July 2016

This Neighbourhood Plan is approved and lasts until 2030, and relevant parts are attached as

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Appendix D to this document. These parts include maps of the DVAONB and policies with supporting text which promote the protection of the AONB, its setting and associated views from East Bergholt into the AONB. Policy EB6 and Policy EB9 provide standards and guidance on how developers should approach projects which are directly in, or in the setting of, the DVAONB. The promotion of biodiversity is also a key policy of East Bergholt, covered in Policy EB8. SCC understands that the measures proposed by the Applicant to mitigate the visual impact of the onshore substation will take 5-15 years to grow, and SCC is unsure to what extent the Applicant will commit to ensuring this mitigation will negate the visual and landscape impact for the entirety of the project's lifespan. So, there will be negative visual impacts on East Bergholt to some extent.

Stutton Neighbourhood Plan 2022-2037, made July 2023

This Neighbourhood Plan is approved and lasts until 2037, and relevant parts are attached as Appendix E to this document. The parts of this plan deemed relevant are similar to those of East Bergholt's plan, including relevant maps, views and respective assessments, and policies regarding the protection of the AONB, and views from Stutton onto it. Specifically, Policy SN9, Policy SN10 and Policy SN13 are included due to their relevance to the DVAONB,

	Question to:	Question	Local Authority Answer
			<p>with maps referenced within the policies also appended. Assessments of “Fringe Character Areas” 3,4 and 5 are also included, since these areas are within the AONB and are within the zone of theoretical visibility of the onshore substation, as identified by the Applicant [APP-180].</p>
GC.1.03	LPAs	<p>Updates on other development Provide an update on any planning applications that have been submitted or any permissions that have been granted following the submission of the Application for the Proposed Development which could either affect the Proposed Development or be affected by the Proposed Development and whether those developments would affect the conclusions reached in the Environmental Statement (ES).</p>	<p>In [APP-232], the Applicant claims compliance with paragraph 4.1.5 of EN-1 in terms of adequately assessing cumulative impacts in the ES. However, there are notable omissions in some of the Applicant’s cumulative assessments of NSIPs which are spatially, and temporally in terms of construction timeframes, proximate to this project. Such NSIPs include EA1N, Sealink, Lionlink, Nautilus and Bramford to Twinstead. Whilst these projects may not have been submitted since the submission of the Application for the Proposed Development, SCC argues that this point is relevant due to the scale and spatial-temporal proximity of these projects, which also warrants their inclusion in assessments of cumulative impacts. In relation to Suffolk, their inclusion could affect conclusions reached in Traffic and Transport assessments. Other assessments may also be affected., Regarding the Socio-Economic, Tourism and Recreation assessments [APP-085, section 3.11], the Bramford to Twinstead</p>

			<p>Grid Reinforcement project is omitted from the assessments of cumulative impacts.</p> <p>In fact, no upcoming NSIPs are considered in the Applicant’s Outline Skills and Employment Strategy (OSES), which SCC views as problematic due to the large impacts these projects are expected to have on the workforce in Suffolk, especially from Sizewell C. Specifically, SCC wishes for the Applicant to clarify how it will adapt and coordinate its activities in relation to those of proximate NSIPs. Further details on SCC’s position on this issue can be found in paragraphs 8.26, 8.31 and 8.41 of its LIR.</p> <p>It is also possible that other NSIPs in Suffolk will contribute to cumulative impacts of this project in terms of port activities, since several offshore windfarms are already using, or intending to use, Suffolk ports, or ports bordering Suffolk such as that of Great Yarmouth, during construction and/or operations and maintenance. Examples include EA1N, EA2, EA3, EA1, Greater Gabbard, Galloper and London Array, as well as other types of projects which may also use such ports, including Sea Link, Lion Link and Nautilus Interconnector. Whilst SCC does not expect the Applicant’s cumulative impact to be significant, it is nevertheless valuable to ensure that no unforeseen complications regarding the Applicant’s use of ports arise through the</p>
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	Question to:	Question	Local Authority Answer
			creation of an outline port construction traffic management plan.

<p>SLV.1.01</p>	<p>Applicant and Suffolk and Essex Coast and Heaths National Landscape Partnership</p>	<p>Duty to seek to further the purpose of conserving and enhancing the natural beauty of the area</p> <p>Is it possible for an offshore wind farm to comply with the duty to further the purpose of conserving and enhancing the natural beauty of the area?</p>	<p>New Question SLV.1.04 is relevant to the concerns raised by SCC about the effects of the proposal on the SCHAONB and so is responded to by SCC at this stage. SCC may comment further when it has seen the response provided by the Applicant to this question.</p> <p>The duty is set out in section 85(A1) of the Countryside and Rights of Way Act 2000 and was brought into force on 26 December 2023. It applies to the Applicant, as a statutory undertaker within section 85(2)(c), and to the Secretary of State as a Minister of the Crown within section 85(2)(a), both being ‘relevant authorities’ for the purposes of section 85. The duty is as follows:</p> <p><i>“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”</i></p> <p>This duty replaces an earlier duty which was simply to ‘have regard’ to the purpose of conserving and enhancing the natural beauty of the designated area. The formulation of the duty means that it can apply to the giving of development consent for works that are not within a designated area where the carrying out</p>
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	Question to:	Question	Local Authority Answer
			<p>of those works would 'affect land in' a designated area. This is confirmed by the guidance at paragraphs 5.10.8 and 5.10.34 of EN-1. The duty is not expressed as an absolute obligation to achieve an outcome of furthering the purpose of conserving and enhancing the natural beauty of the designated area, but there is a mandatory requirement, on both the Applicant and on the Secretary of State, that they '<u>must seek to</u>' do so. In SCC's view, this requirement means that as much as is practical must be done to avoid or minimise any harm to the designated area (so conserving it) and where residual harm remains that measures should be put in place to offset that residual harm by improvements to the designated area (so enhancing it).</p> <p>SCC notes that section 85(1A) empowers the Secretary of State to make regulations including provisions on how the duty is to be performed but no such regulations have yet been made.</p> <p>SCC considers that it is <u>possible</u> for an offshore windfarm which impacts on a designated area to comply with the duty, but this will only be so where it is demonstrated that all realistic measures have been taken to avoid or minimise any harmful impacts and, where there is still residual harm, that realistic and proportionate measures are proposed to improve the</p>

	Question to:	Question	Local Authority Answer
			<p>designated area by way of offsetting that residual harm. As noted in its Local Impact Report, SCC is only aware of one offshore windfarm that has been approved since the new duty came into force (the Sheringham and Dudgeon Extension Projects, approved by the Secretary of State on 17 April 2024). In that case the Secretary of State was satisfied that the applicants had taken all possible steps to comply with the new duty (as noted at paragraphs 4.55 and 4.56 of the decision letter). SCC considers that the mitigation hierarchy should be applied in considering such steps or measures so that avoidance is preferred before minimisation, and minimisation is preferred before offsetting.</p> <p>The SCC Local Impact Report provides further comments (in section 6) on what measures should be considered in the case of the impacts on the SCHAONB.</p>

	Question to:	Question	Local Authority Answer
		Terrestrial Transport and Traffic (TT)	

	<p>National Highways, Essex County Council, Suffolk County Council and any other IP</p>	<p>Assessment of onshore traffic and transport impacts</p> <p>Do you consider that the assessment of onshore traffic and transport impacts for the Proposed Development, as set out in Chapter 8 of the ES [APP-090] and the Traffic and Transport Baseline Report [APP-172 and APP-173] addresses all relevant issues?</p> <p>If not, what are your concerns and how might they be addressed?</p>	<p>The affected highways are within Essex and SCC will restrict its comments to those matters that may result in traffic impacts within Suffolk.</p> <p>SCC noted in its Local Impact Report (LIR) concerns relating to the study area of the assessments, which did not include the A137, which is a road connecting Ipswich to Manningtree and hence the A120. SCC accepts the exclusion of this road from the assessment area on the basis that the Applicant has committed to excluding the road from its HGV routes within the Outline Construction Traffic Management Plan [APP-257]. SCC’s specific concern is the cumulative, repeated impact of the temporary works required to allow special order movements to exit the Port of Ipswich via the A137 for NSIPs in the region.</p> <p>It is unclear to SCC why the Applicant has not included the Bramford to Twinstead Grid Enhancement, Sealink, Lionlink, Nautilus and EA1N within the cumulative developments in its assessment of cumulative impacts on traffic [REP1-018, section 8.12 and table 8.45]. It is also not clear within the Applicant’s cumulative assessment whether the full Norwich to Tilbury project is included, as opposed to only the substation, since only the substation is included in assessment tables [REP1-018, table 8.46]. The full project should be included, as much traffic related to the southern end of the scheme is routed via the A12, for example to access the</p>
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	Question to:	Question	Local Authority Answer
			<p>main construction compound off the A134 at Leavenheath.</p> <p>As stated in its LIR, SCC is concerned that the AIL movements may be subject to change following appointment of the contractor [see sections 7.13 to 7.15]. The main concern is that AILs may still be routed move through Suffolk impacting on routes from Ipswich and other ports and the local road network when diverted from the SRN. SCC’s concerns mainly apply to special order AILs, although the route for non-special order AILs should also be demonstrated to be fit for purpose. Details on what mitigations SCC deems necessary can be found from paragraphs 7.16 to 7.18 of SCC’s LIR, which includes detailed assessments of possible routes in collaboration with SCC and coordination with North Falls on AIL strategy.</p> <p>SCC also has concerns relating to the movement of construction traffic and workers for the purpose of constructing the Orford Ness. Although SCC acknowledges the duration is short and the proposed vehicle movements low, the authority remains concerned that vehicles may need to be parked, or plant / material stored in Orford due to weather or tidal access problems crossing the river. Details on logistical plans, including parking, welfare facilities and how long the works will take should be provided</p>

	Question to:	Question	Local Authority Answer
			and where necessary secured in the control documents, such as the OCTMP [APP-257].

	<p>Essex County Council and Suffolk County Council</p>	<p>New Question Transport impacts at ports During ISH1 you made the case that the Applicant should prepare and submit an Outline Port Construction Management Plan to manage the impacts of traffic at ports during the construction and operation of the offshore elements of this proposed development. Given the Applicant’s comments on their offshore activities and resulting onshore traffic impacts at ports in paragraphs 2.7.4 to 2.7.7 of [REP1-059], do you still consider such an Outline Port Construction Management Plan should be submitted?</p>	<p>SCC considers that the Applicant should be required to submit an Outline Port Construction Traffic Management Plan, contrary to the Applicant’s position stated in paragraphs 2.7.4 to 2.7.7 [REP1-059]. As the location of the port has yet to be determined it would appear difficult to determine whether any traffic impacts associated with construction or maintenance of this project are included within extant planning permissions. Whilst SCC acknowledges that the Applicant expects the impact to be relatively minimal in in paragraphs 2.7.4 to 2.7.7. [REP1-059], such findings have not been presented as a formal assessment and are not referenced in control documents. A precedent was set for this in the SPR EA1(N) DCO at part 3 of schedule 1, Requirement 36, and in identical terms for EA2.</p> <p>While welcoming the opportunities of the Applicant using a port in Suffolk, the authority is also aware of the potential cumulative impacts if more than one project utilises the same port. An additional benefit from such a plan, and of a travel plan for the operational phase, would be to further support the use of sustainable transport where provision is likely to be greater than for workers employed on the onshore cable route.</p> <p>If the Applicant creates an Outline Port Construction Traffic Management plan for traffic associated with its port activities within Suffolk,</p>
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	Question to:	Question	Local Authority Answer
			<p>then the Applicant should reference relevant Suffolk policy and guidance depending on what the relevant plans are for the chosen port. Policy SCLP7.1 (Appendix G) and Policy WLP8.21 (East Suffolk Council Waveney Local Plan 2019, Appendix H) are examples of possible relevant policies.</p>



Five Estuaries

**Response to ExQ1 Appendix A:
Extracts from Southwold Neighbourhood
Plan**

Explanatory note

Relevant extracts of Southwold's Neighbourhood Plan are included in this document. These parts include Policy SWD6 and supporting text which focuses on the protection of the national landscape and the distinctive character the surrounding landscape gives to Southwold. As demonstrated by the Applicant's viewpoints from Southwold – Gun Hill [APP-204] and Southwold Pier [APP-219], turbines from this project, and those of other projects, will be visible from Southwold at certain levels of visibility. A map of the Plan's boundaries is also included.



Southwold Neighbourhood Plan 2020-2039

Made 23rd February 2022

Blue areas: New employment zones (Policy SWD10) Green areas: Development areas (Policy SWD16) Red line: Physical development limit of Southwold (Policy SWD16)



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POLICY SWD6 - DESIGN

In order to create high quality buildings and places that are beautiful and enduring, development proposals should be informed by the National Design Guide as appropriate to their scale nature and location and respond positively to its principles.

All planning applications should demonstrate, either through the Design and Access Statement where this is required or through sufficiently detailed plans and documents, that they have:

- A. understood and followed the process for creating high quality design set out in the National Design Guide;**
- B. understood and proposed design that is sympathetic to and in keeping with the best of the prevailing local character area;**
- C. maximized the opportunities to improve the quality of design;**
- D. positively addressed the Recurrent Design Issues and area-specific Sensitivities and Susceptibilities identified in the Southwold Character Area Appraisal (SCAA) and reinstated character where the SCAA identifies opportunities for this; and**
- E. where relevant, addressed heritage management issues identified in the Southwold Conservation Area Appraisal.**

Development proposals which do not demonstrate their compliance with the design principles A – E above will not be supported.

Supporting text for Policy SWD6:

Landscape

- 5.4 The Waveney District Council Landscape Character Area Assessment⁴⁶ describes the town as having a “unified character which adds to the strong sense of place evident in this part of the Suffolk Coasts and Heaths AONB.” The town is “traditional,” “compact,” “low key,” “contained by landform and estuary,” and characterised by “an intimate spatial scale in terms of streets and building heights”. Its skyline has “a simple and uncluttered character.” As for its setting, “this is a simple, often wild coastal landscape of big skies and defined by panoramic views across a windswept, exposed coast to an ephemeral seascape characterised by tidal movement and associated changes in the quality of reflected light and shadow.”
- 5.5 The National Planning Policy Framework requires local planning authorities to give great weight to conserving landscape and scenic beauty in the AONB (Paragraph 176).
- 5.6 Local Plan Policy WLP8.33 requires development proposals to be informed by and be sympathetic to the distinctive character of Southwold’s landscape. “Proposals should demonstrate that their location, scale, form, design and materials will protect and where possible enhance the special qualities and local distinctiveness of the area and visually sensitive skylines, seascapes and significant views towards key landscape and cultural features... Proposals should also include measures that enable a scheme to be well integrated into the landscape...”
- 5.7 The impact of development on landscape is particularly important on the perimeters of the built area of the town – for example, North Road, Ferry Road, the Harbour, the Common, Blyth Road, Mights Road, Station Road, North Parade, East Cliff, Centre Cliff, and Gun Hill.

The National Design Guide and Southwold Character Area Appraisal

- 5.13 The Local Plan states unequivocally that development proposals “will be refused” if they fail to meet the Local Plan’s criteria for demonstrating “high quality design which meets local distinctiveness.” (Policy WLP 8.29 –design). The Neighbourhood Plan reinforces this expectation by incorporating the National Design Guide (NDG) and the Southwold Character Area Appraisal (SCAA) into its design policy.
- 5.14 The NPPF requires the use of design guides to help applicants achieve high quality design. The NDG (Para 168) states that the NDG should be used in the absence of a local design guide. The Local Plan calls for the use of Building for Life12 for “major residential development proposals”, defined as schemes of over ten dwelling. However, the Local Plan is silent on the use of design guides for the small scale development typical of Southwold. A Suffolk Design Guide has been commissioned but has not yet been published. Until such time as the Local Plan adopts a local design guide that is suitable to the Neighbourhood Plan Area, then the NDG (which is applicable to proposals of all sizes) will be used to achieve high quality design in Southwold and to determine applications.⁴⁸
- 5.15 In specifically adopting the NDG as part of its Neighbourhood Plan, Southwold is encouraging decision-makers, applicants, and designers to ask the question, “Is this design good enough to be accepted?” instead of “Is it bad enough to be refused?”
- 5.16 The NDG makes clear that good design is achieved by making the right choices -- at all levels and scales (Para 57) -- about layout; form and scale; appearance (a concept not included in the Local Plan), landscape, materials and detailing.
- 5.17 The NDG introduces 10 characteristics of well-designed buildings and places. Whilst not all characteristics will apply to every application, it is expected that Context, Identity and Resource will always be relevant.
- 5.18 The NDG highlights the importance of taking the opportunities available for improving the character and quality of an area. *“Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones (Para 40). Well designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it (Para 41).*
- 5.19 The emphasis on opportunities is especially relevant to Southwold, whose small scale, density, and the lack of land for development amplify the impact of poor quality design. Simply put, Southwold does not have the room for mistakes, nor does it have room for design that is “better” but still not “best.” When schemes do not maximise the opportunities for improving the quality of design, they should be refused.
- 5.20 The purpose of the SCAA is to help applicants understand the Context and Identity of Southwold. This document uses four character areas identified in the Southwold Conservation Area Character Appraisal 2008⁴⁹ and adds three more areas. (See Section 13)

⁴⁸ National Design Guide, p4, paras 13-14 <https://www.gov.uk/government/publications/national-design-guide>

⁴⁹ <http://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/waveney-conservation-areas/conservation-area-appraisals/southwold-conservation-area-appraisal/>

The seven distinct character areas are:

1. Old Town
2. Marine Villas
3. Seaside Suburban
4. Seaside Corporation
5. Town Farm
6. Gateway
7. Harbour and Ferry Road

- 5.21 The SCAA describes the history of development, landscape, townscape vegetation, undesignated heritage assets, and open and green spaces. It also provides some pictorial guidance on design that is considered "in character" and "out of character," with explanations.
- 5.22 The SCAA will need to be read in conjunction with the Conservation Area Appraisal. The primary focus of the Conservation Area Appraisal is identifying and describing heritage assets. The SCAA focuses on the qualities that give each area a distinctive identity.
- 5.23 For each area, the SCAA highlights sensitivities and susceptibilities. All applications will be expected to demonstrate how they are responding positively to sensitivities and susceptibilities and how they are taking opportunities to avoid and correct previous mistakes by, for example, reinstating original boundary treatments, window styles and other detailing, or restoring and improving garden space. Sensitivities and susceptibilities are based on the field work undertaken for the SCAA, which identified the recurrent design issues discussed below. This approach is consistent with the design-led approach as captured in national planning policy. The Neighbourhood Plan sets out the Town Council's approach towards a clear design vision and expectations for development sites. This will ensure that applicants have as much certainty as possible about what is likely to be acceptable.

Landscape Character

- 5.25 Development on the perimeter of the built area of the town does not always respond to and enhance the character of its exceptional landscape.
- 5.26 Landscape is experienced from two directions – from inside the town looking out, and from outside the town, looking in. Accordingly, development proposals should be treated as double-sided and assessed from the special landscape areas identified in the Character Area Appraisal.

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- 5.27 For perimeter development, the landscape may be the most important element in the setting. Therefore, the application needs to demonstrate that the applicant has understood the landscape context and that the design has responded to this context.

Amenity – Sense of Space and Visual Amenity

- 5.28 The Local Plan, Paragraph 8.157, states: "It is a primary aim of the planning system that development should deliver good standards of amenity for existing and future occupiers and surrounding uses and does not generate significant harmful effects. Harmful effects can arise from overlooking, loss of privacy, noise and light pollution, and overbearing development, amongst others. Such effects can be triggered by individual developments or as a result of cumulative impacts. The impact can be acute or dispersed, affecting the general amenity or tranquillity of an area."
- 5.29 In Southwold, amenity impacts are frequently dispersed. The town is densely developed with an urban grain that is a mixture of "ancient desire lines" and planned development from the Victorian, Edwardian and Garden City periods – all within a small and contained geographic area. In many parts of the town, dwellings are in close proximity, overlooking each other. Southwold also has a number of alleys, footpaths, and private shared paths that lead to courtyards or individual buildings. This creates visibility even when structures do not front onto streets.
- 5.30 Within Southwold's dense urban grain, the open spaces around buildings (including gardens, courtyards, and all rights of way) combine to create a sense of space for surrounding dwellings. Encroaching development can affect this essential amenity. Accordingly, a proposed scheme's impact on sense of space should always be considered, taking into account the cumulative impact of earlier development on the surrounding area.
- 5.31 Poor quality design creates visual blight, which will always have a significant adverse impact on visual amenity. In Southwold, the design of buildings can be experienced not only from the street but also from the public or private domain in the rear of buildings, or from public rights of way or shared private paths. Accordingly, when an application is assessed, its impact on visual amenity should be considered from all sides, including from private space from which it would be visible. This principle of looking at the impact of design from the side and rear as well as front elevations is already embedded in the Waveney Built Heritage and Design Supplementary Planning Document⁶⁰ (April 2012), (Sections 4.19 – 4.20).

The Public Realm

- 5.32 Historic walls are protected within the Conservation Areas but outside the Conservation Areas, there are 20th century boundary treatments that contribute positively to character. Some have been identified in the Character Area Appraisals; others will be identified through individual planning applications. Where boundary walls contribute positively to character, they should be preserved and restored.
- 5.33 Development proposals will be expected to take account of their impact on the public realm, and preserve and enhance its character. Landscaping should provide green areas visible to the public and contribute to bio-diversity. New boundary walls should harmonise with the character of the area.

⁵⁰ <http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/existing-waveney-local-plan/supplementary-planning-documents/guidance-for-historic-buildings-and-conservation-areas/>

Coherence

- 5.34 Often, new development is poorly integrated because of forms, elevations, materials, and detailing that are incongruous, out of scale and not proportional. There are also examples of visually dominant subsidiary development that has overwhelmed the original building.
- 5.35 Many of Southwold's buildings are simple cottages, whose quality depends to a large extent on maintaining their simplicity and their completeness. Design proposals that clutter and dilute the character of simple cottages will not be acceptable.
- 5.36 Southwold has a number of rows of terraces, pairs of semi-detached houses, and one cluster of bungalows, whose quality of design derives from uniformity, and repetition of rhythms. Alterations to some of these buildings has degraded character by introducing elements and details that noticeably break up uniformity and rhythm, creating incongruity. Where uniformity, including rhythmic repetition, is a part of character, design proposals will be expected to preserve and enhance these qualities including through the use of consistent forms, elements, materials, fenestration, and detailing. Loss of coherence is not a justification for further erosion of character but an opportunity for reinstatement of lost character.



Five Estuaries

Response to ExQ1 Appendix B:
Extracts from Reydon Neighbourhood Plan

Explanatory note

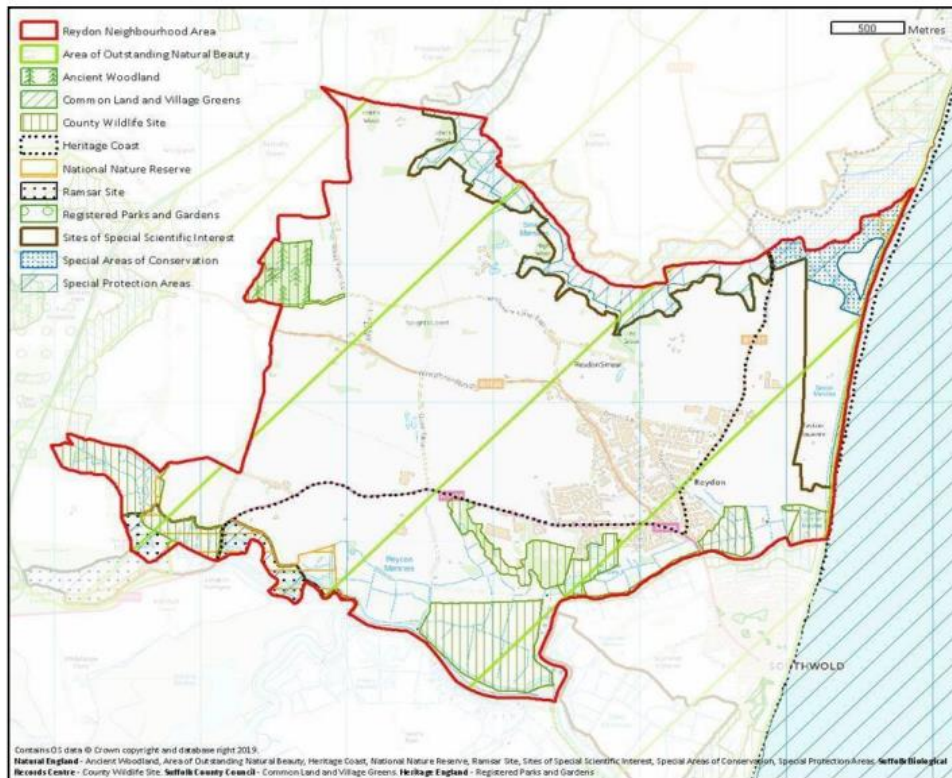
Relevant extracts of Reydon's neighbourhood plan are included in this appendix. These parts cover "Key Issue 2: Protecting the Countryside Around the Village", including Policy RNP 5 and the supporting text, which is captioned. This policy also promotes protecting the natural beauty and special qualities of the national landscape and encourages projects to enhance these features.



Reydon Neighbourhood Plan 2019-2036

Made 26th May 2021

Reydon Nature Designations



5. KEY ISSUE 2: PROTECTING THE COUNTRYSIDE AROUND THE VILLAGE

5.1 Almost all new development in Reydon, whether for housing or other uses, will be in the countryside at the edge of the built area of the village. This countryside is already protected by its status as an Area of Outstanding Natural Beauty (AONB).

5.2 Reydon includes and is surrounded by habitats sites designated for their international wildlife value. To the north, there is Benacre to Easton Bavents Special Protection Area (SPA), Benacre to Easton Bavents Lagoons Special Area of Conservation (SAC) and to the south the Minsmere-Walberswick SPA and the Minsmere-Walberswick Ramsar site.

5.3 As part of the plan-making process, the Parish Council sought the community's views about what are the most valued elements of the countryside around the village and also in what circumstances they thought development could be allowed on some of the less sensitive areas.

5.4 They identified Reydon Wood, The Hen Reedbeds, Pottersbridge Marshes, Reydon Smere, Smere Marshes, Reydon Common Marsh, the St Felix County Wildlife Site and the Riverside Grazing Meadows and Marshes as the most valuable areas of the surrounding countryside. Many of these areas comprise or include sites which have formal designations as natural areas of special importance. These are shown on the map on P22. These designations will continue to operate in their own right throughout the Plan period. In addition, the countryside west of Quay Lane to the parish boundary and that between the northern and southern marshes has been identified as areas of "very high landscape value" (Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study, 2016).

5.5 For all other areas of the countryside in and around the parish, the community commented that development should only be allowed where there is clear evidence that it is required to meet local need and help maintain a sustainable community. We believe the housing policies set out above, together with the proposed development of 220 houses on land west of Copperwheat Avenue included in WLP (Policy 6.1), reflect this balance.

5.6 Nonetheless, the large increase in housebuilding in Reydon over the next few years (at least 312 currently planned and possibly up to 331) compared with the modest growth of the last ten years (109 new houses, 2008 - 2018) will be a significant pressure on the village and its surrounding countryside. Our consultation showed that the community regards this quantity of development to be at the limit of what can be managed. Within this context, Policy RNP3 (Affordable Housing on the Boundary of the Settlement) identifies circumstances where such development will be supported on the edge of the settlement boundary, and therefore within the countryside.

5.7 East Suffolk Council have developed the Recreational Avoidance and Mitigation Strategy (RAMS) to mitigate recreational disturbance impacts on habitats sites. The approach set out in the RAMS document will apply across the Neighbourhood Plan area.



Footpath off School Lane

5.8 Policy RNP 5: Maintaining Protection of the Countryside Around the Village:

Development outside the settlement boundary should protect and where possible enhance the natural beauty and special qualities of the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty in accordance with Policy WLP 8.35 of the adopted Waveney Local Plan.

The following areas (as shown on Policy Map RNP Map 3) are identified as the most-valued parts of the countryside in the neighbourhood area:

- Reydon Wood;
- The Hen Reedbeds;
- Pottersbridge Marshes;
- Reydon Smere;
- Smere Marshes;
- Reydon Common Marsh;
- St Felix County Wildlife Site; and
- Riverside Grazing Meadow and Marshes

Within the most-valued parts of the countryside identified above, proposals for development will not be supported unless:

- the development is needed to preserve their character and integrity;
- a demonstrable need for the development to take place in the location has been satisfactorily evidenced;
- there are no suitable and available alternative sites outside of these areas; and
- the impact on the landscape is mitigated through sensitive design and a detailed landscaping scheme.



Smere Marsh



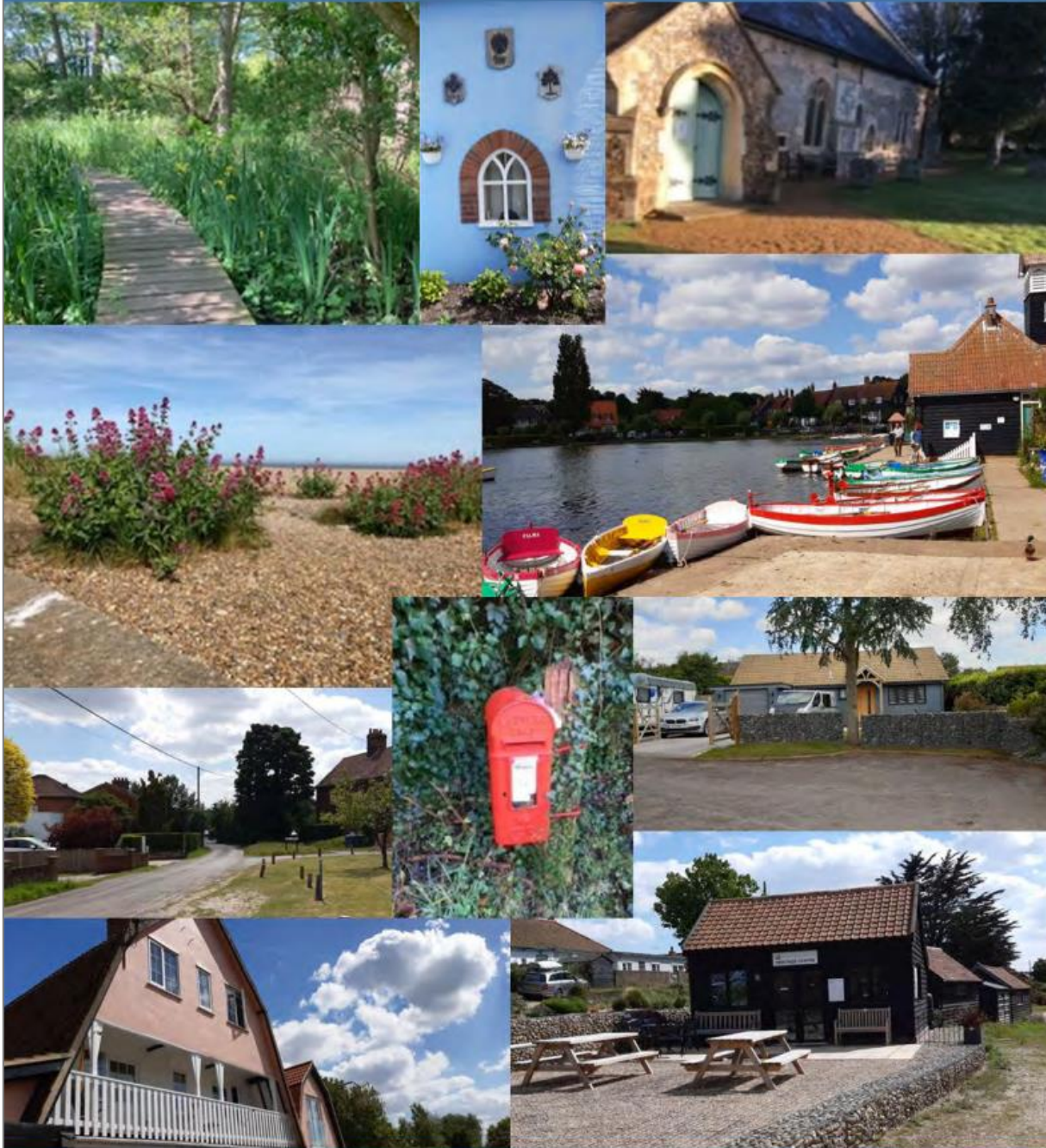
Five Estuaries

Response to ExQ1 Appendix C:
Extracts from Aldringham-cum-Thorpe
Draft Neighbourhood Plan

Preface

The status of this Neighbourhood Plan is currently emerging and in the pre-submission phase, with a referendum expected in the winter of 2025/26. A diagram of the projected timescale for this plan to be made is included in this appendix, which also includes the parts of the draft plan relevant to this project. Policy ACT4 requires mitigation and compensatory actions where relevant to deal with the impacts of major energy infrastructure. Policy ACT5 aims to protect the character of landscape in the area, including the national landscape. The supporting text for policies included in this appendix is also included and captioned as such. A map indicating the Plan's boundary is included.

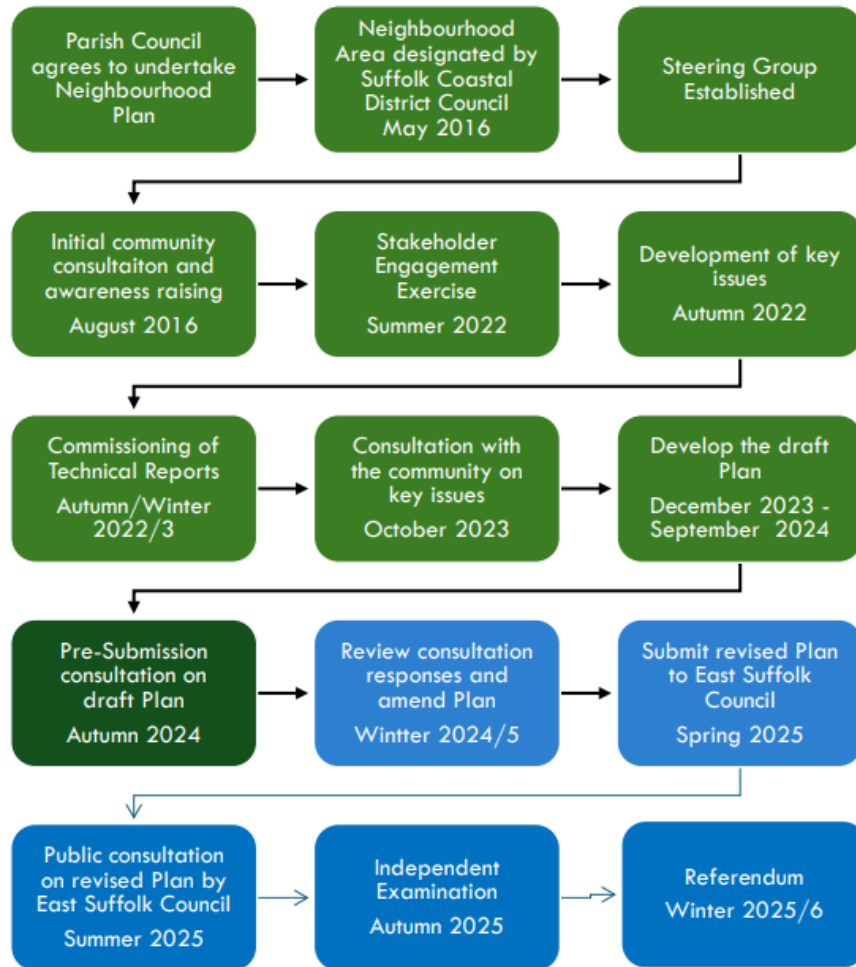
Aldringham cum Thorpe Neighbourhood Plan 2018-2036



Pre-Submission Version, October 2024

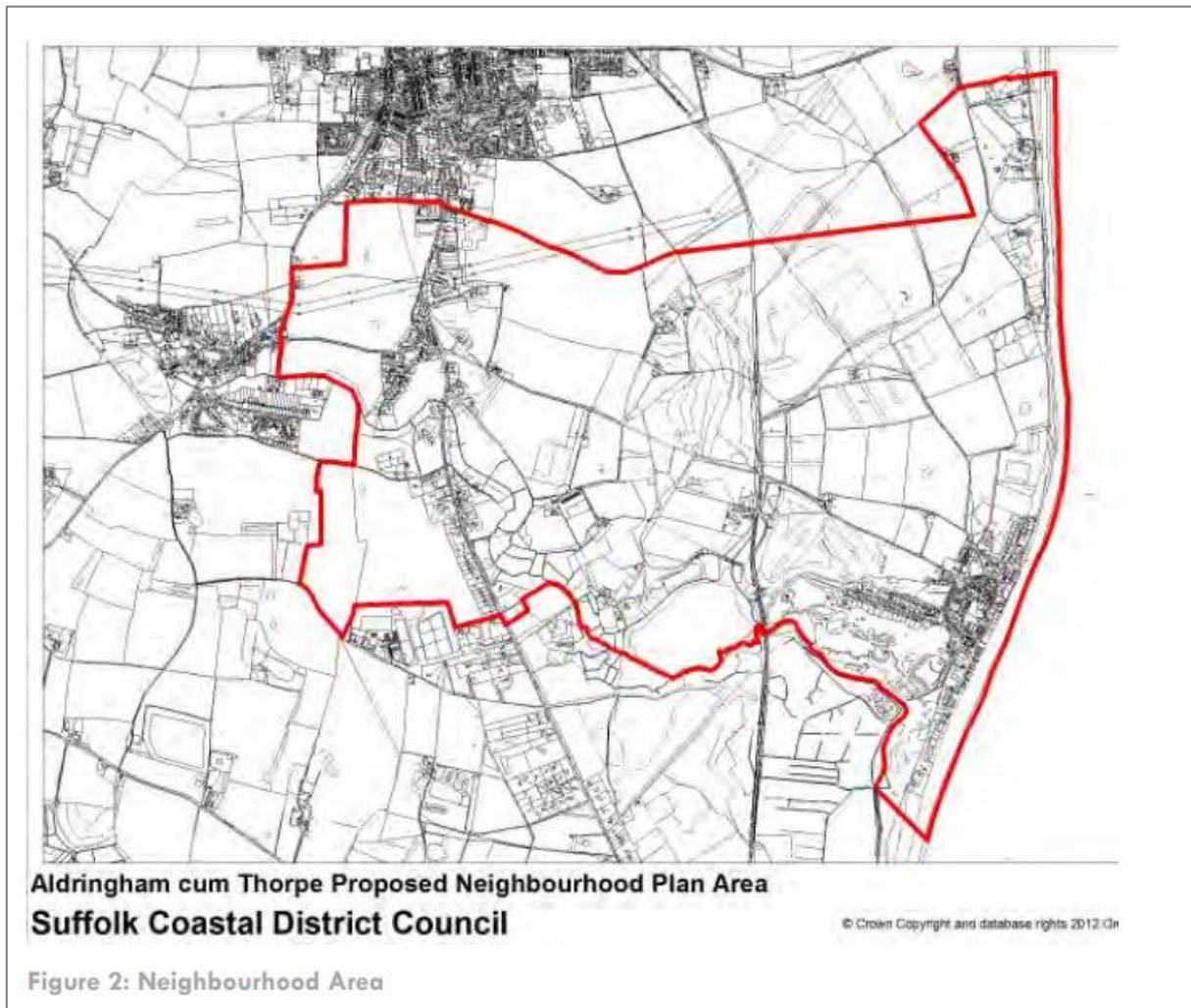
Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

Figure 1: Neighbourhood Plan process and progress.



Key

- Completed stage
- Current stage
- Future stage



<p>Policy ACT4</p>	<p>Mitigating the impacts of large scale energy projects</p> <p>The potential adverse impacts on the parish of major energy projects, including cumulative impacts from multiple schemes, should be given significant weight in the determination of such schemes.</p> <p>Where mitigatory or compensatory measures are identified which are considered necessary to remedy the impacts of major energy schemes on the landscape, natural environment, historic environment or the residential amenity of the parish, these should be provided in the first instance directly in the parish where those impacts are most felt and only if this is not possible or practicable should they be provided elsewhere in the parish.</p>
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Supporting text for Policy ACT4:

8. Natural Environment

Objective 2: To respond to the effects of climate change and sea level rise by requiring new development to adapt and mitigate to the environmental and constructional challenges arising.

- 8.1 The National Planning Policy Framework (NPPF 2023), makes it clear that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change including providing support for renewable and low carbon energy and associated infrastructure.
- 8.2 The NPPF goes on to explain that planning policies should help to increase the use and supply of renewable and low carbon energy and heat and provide a positive strategy for energy from these sources, that maximises the potential for suitable development and their future re-powering and life extension whilst ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts). The Government's 25 year Environment Plan outlines a broader commitment to reduce emissions from 1990 levels by 80% by 2050.
- 8.3 The Adopted Local Plan recognises that in respect of wind power, much of East Suffolk's environment is a sensitive one and needs protection. The Local Plan encourages the generation of renewable energy, most notably to serve local communities. Although generally encouraged, proposals will need to ensure they do not adversely affect the high quality landscape, natural beauty and special qualities of the Suffolk Coast and Heaths AONB, wildlife populations or habitats and avoid noise pollution. The Local Plan indicated that the Council intended to undertake a Supplementary Planning Document related to low carbon and renewable energy development, following completion of the Local Plan, however this is yet to come to fruition.
- 8.4 The Local Plan recognises that multiple energy proposals could have potentially significant and cumulative impacts on the East Suffolk countryside and will be working closely with Government and other agencies to ensure issues related to the National Grid are considered comprehensively and not incrementally. Figure X below shows the

51

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

routes and impacts of the of the multiple large scale energy projects located in and around the Neighbourhood Area.

- 8.5 Proposals for wind energy and energy from biomass or waste of more than 50MW installed capacity are defined as nationally significant infrastructure projects and are determined by the Secretary of State. Policy relating to such proposals is contained in the National Policy Statement for Renewable Energy Infrastructure. The major energy projects affecting the parish outlined in Chapter 2 and shown in Figure 32 below fall within this category and therefore the ability of this Neighbourhood Plan to influence such schemes is extremely limited.

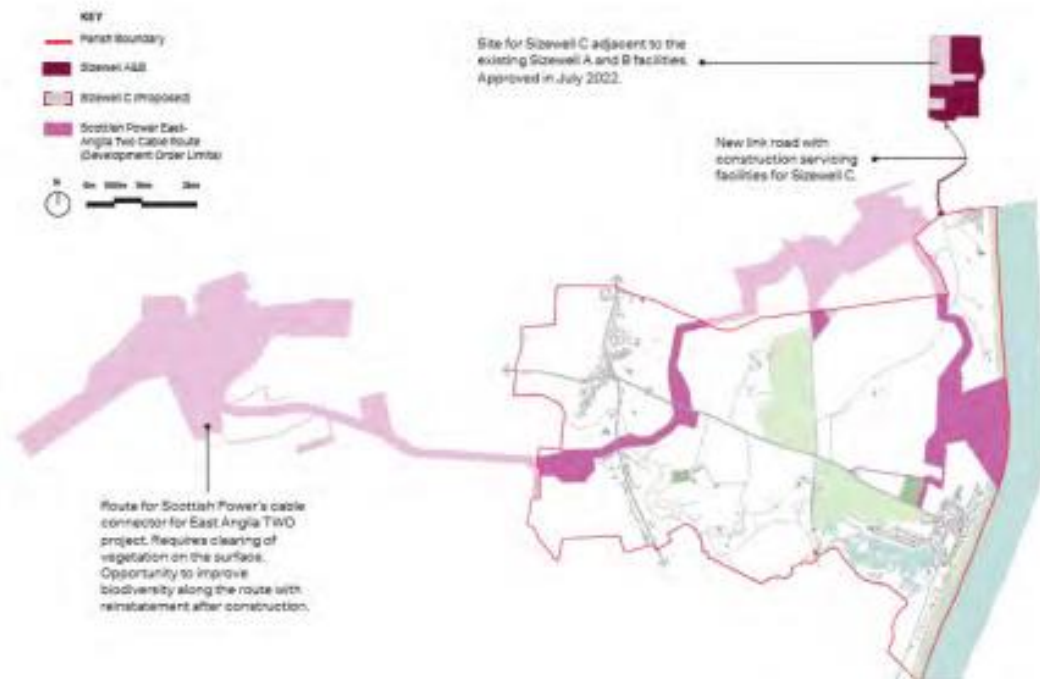


Figure 37: Map showing the impacts of large scale energy projects on the Neighbourhood Area. (Extract from AECOM report)

- 8.6 The Policy Ideas Exhibition Results revealed a level of concerns from local residents about the scale and number of major energy projects proposed in and around the parish and concerns over the potential cumulative impacts on the natural and historic assets of the parish together with the potential to adversely impact residential amenity. This concern not only related to the major energy projects themselves (which are predominantly to be located offshore) but also to the associated infrastructure required to connect them to the National Grid for example, cables, connectors, pylons etc.
- 8.7 The Neighbourhood Plan, therefore, seeks to ensure that the cumulative impacts of multiple energy schemes on the Neighbourhood Area are taken into account by the relevant determining body. The Plan also seeks to ensure that where such energy schemes are identified as being likely to have adverse impacts on the parish, including the cumulative impacts from multiple schemes and their associated infrastructure) that those mitigations are prioritised and suitably located within the Neighbourhood Area.

8.37 Taking all of the above into account **Policy ACT5** has been developed.

**Policy
ACT5**

Landscape Character:

The visual scenic value and distinctive landscape character of the countryside within the parish but outside of the defined settlement boundaries will be protected from development that may adversely affect this character. In particular landscape features such as pine lines, areas of heathland, common and blocks of woodland which are synonymous with the Estate Sandlings and the Coastal Broads and Marshes landscape character types will be retained, restored and enhanced.

The existing clear landscape breaks that physically separate the distinctive settlement within the parish (as shown on Figure 31) and those immediately adjoining will be maintained as open countryside in order to prevent coalescence and loss of settlement identity and distinctiveness.

When considering applications for development high priority should be given to:

- Preserving the landscape break between Aldringham and Thorpeness
- Protecting the sense of separation and openness between the settlements of Aldeburgh and Thorpeness and avoiding ad hoc and incremental development which urbanises this coastal landscape, particularly along the open coast road
- Protect remnant heathlands from any development that would result in their loss or reduction in area
- Protecting the natural character of the foreshore and its vegetated shingle.
- The open and undeveloped valley floor of the Hundred River to the southwest of Aldringham where development may have a material adverse impact on the qualities of the landscape that make it special.
- Including landscape improvements as an integral part of the development proposal
- Ensuring that the special qualities of Thorpeness and Aldringham are retained

61

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

Important Views

The views and vistas as shown on (Figures 39 and 40) above are identified as important public local views.

Development proposals within or that would affect an important public local view should take account of the view concerned and developments which would have an unacceptable adverse impact on the landscape or character of the view concerned will not be supported.

(See also Thorpeness Design Guidance and Codes)

Supporting text for Policy SCT5:

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

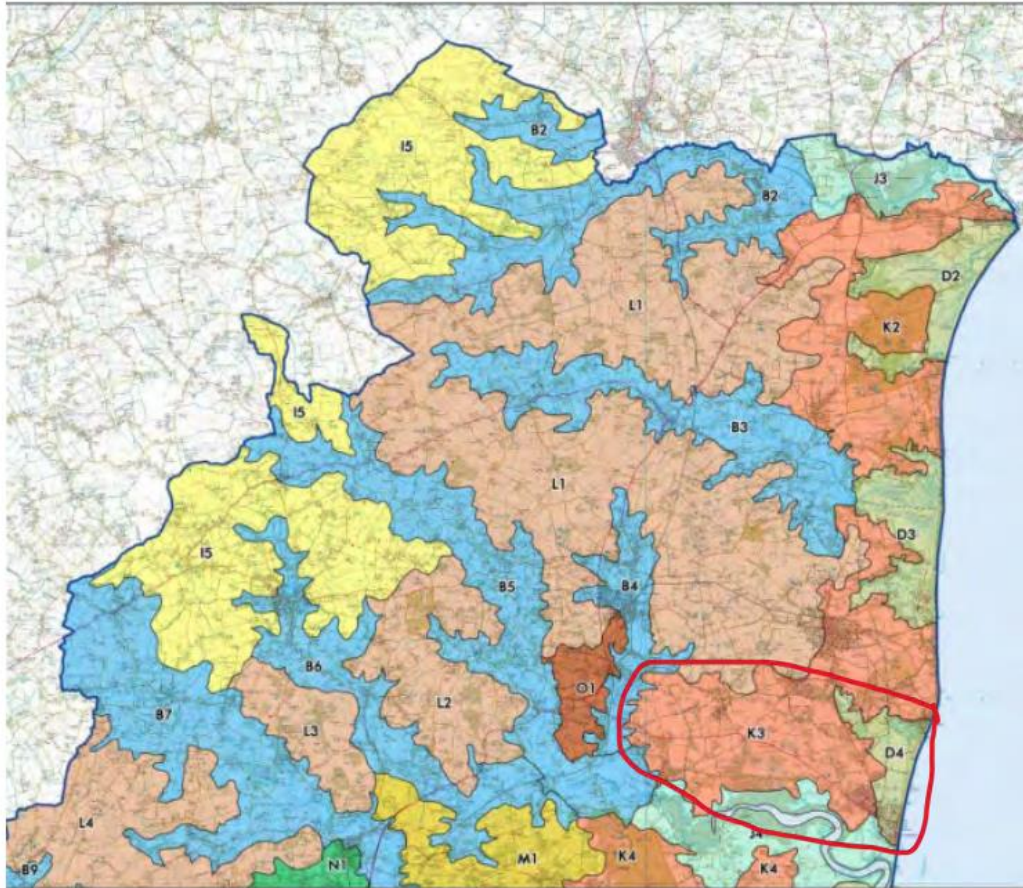


Figure 38: Suffolk Coastal Landscape Character Assessment 2018. Location of Neighbourhood Area shown in red.

Aldringham & Freston Sandlands Character Area K3

8.11 Aldringham falls within the Aldringham & Freston Sandlands Character Area K3 as identified in Suffolk Coastal Landscape Character Assessment produced in 2018 to support the Local Plan.³ The area is a coastal strip forming south of Minsmere to Thorpeness and Aldeburgh, then fans out to wrap under the south side of Leiston and spreads westwards to Knodishall, Friston and Snape. The edge of the Ore valley defines the area to the south and west. The area is entirely within the Estate Sandlands landscape type and is distinguished by its 'Sandlings' character and its relationship with the coast and its popular resorts. This is largely a flat and gently rolling farmland, regularly interspersed with small woodlands, and strips, and oak studded field boundaries. Pockets of heathland and woodlands exist alongside large-scale intensive agriculture, with leisure and tourism featuring heavily near the coast. It comprises the flat and gently rolling southern facing slopes that form the transition between the plateau of clay to the north and west, and the low lying Coastal Levels and Valley Meadowlands of the Ore valley to the south. Land rises from just above sea level to the plateau edge at 15-20m AOD. The soils are the freely draining sandy

³ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/SCDC-Landscape-Character-Assessment.pdf>

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

acidic soils found along the Suffolk Coast, overlying red crag which is formed of shelly-sand and silt deposits. Much of this landscape was previously managed as lowland heath, over many centuries, as it was too marginal to be of use to farming. It was used as common sheep grazing and for rabbit warrening. The landscape then underwent rapid change with the advancement of agricultural practices, such as irrigation, in the 20th century.

- 8.12 There is heathland at North Warren, Aldringham Common, The Walks, and Thorpeness Common, Names such as The Walks in Aldringham, references the old practice of walking sheep through the grasslands. These commons are varied in their composition. There are patches of sand sedge and heather, dispersed within acid grassland and associated flora, with gorse and bracken invading in some areas. The heaths are important for rare birds such as wood lark and night jar, and the woodlands support nightingale, bull finch, and tree pipits.
- 8.13 Tourism is contained at Aldeburgh and Thorpeness. Some related land uses spill into the countryside, such as car parks and the two golf courses. Along the Aldringham Road to the north-west low density plots spread out along the B1122, continuously linking Aldringham to Aldeburgh. This road has a distinctive character whereby the ribbon development is set within the structure of the pine-heavy, wooded heath and has a strong vegetated character. The houses are well absorbed, yet feel somewhat intrusive within this distinctive, semi-natural Sandlings environment.
- 8.14 Sizewell nuclear power station is isolated from the landscape to the west, behind a series of marshes (in the Coastal Levels type), whose wooded edges provide screening from Leiston. The absence of water courses in the sandlands means settlement here was historically not very viable, but there are scattering of tumuli indicating the presence of ancient settlement here incusing Bronze age barrows in the vicinity of Aldringham Common. Traditional buildings tend to be subsumed within 20th built form, and hard to pick out. In the countryside only occasional cottages or farmsteads that predate this period are seen. These are a scattering of 17th century timber farmhouses, or roadside red brick cottages with plain tiles or pan tiles. There are thatched cottages in Aldringham and houses and walls with flint or cobble panels.
- 8.15 Detracting features include the double row of giant pylons that cross the area, carrying power away from Sizewell, passing north of Aldringham. They have a substantial impact in the more open areas, and they distort the sense of scale within the landscape. The white dome of Sizewell B has a similar effect on scale although is perhaps more an accepted and familiar sight, up and down the coastal zone. Visual experience and perceptions vary. The more semi-natural areas can feel scenic, feel rich in naturalness and provide enclosure in the woodland and wooded heaths. The farmland, where the structure of hedges and field boundary trees is sound, it can feel pleasant and looked after although expansive and windswept at times.
- 8.16 The settlements of Aldeburgh and Thorpeness are key components of this landscape. They have very different appearance and histories, exerting a significant influence on the overall character of the area and shaping people's experience and recreational focus. Two long distance footpaths pass through the area, The Sandlings Walk follows a route along the south of the and the Suffolk Coast path.
- 8.17 The priorities for managing the impacts of development on this landscape type are identified in the landscape character assessment as :

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

- Protect remnant heathlands from any development that would result in their loss or reduction in area.
- Protect the sense of separation and openness between the settlements of Aldeburgh and Thorpeness and avoid ad hoc and incremental development which urbanises this coastal landscape, particularly along the open coast road.
- Manage AONB landscape to ensure its qualities are not harmed.
- Manage the heathlands to ensure retention and conservation of the remnants that remain.
- Consider how to prevent indirect effects resulting from adjacent land use changes such as increase in recreational pressure.
- Manage proliferation of further leisure and tourist related land uses (eg golf courses, caravan parks) especially in the quieter areas of the character area to avoid the profound direct and indirect impacts can result.
- Restore, maintain and enhance the network of pine lines, tree belts and pattern of small plantations found across much of this landscape type.
- Plan for the growth of settlement ensuring that the special qualities of Thorpeness Aldringham and Aldeburgh are retained.

Thorpeness to Aldeburgh Character Area D4

- 8.18 This area comprises the stretch of coastline between the settlements of Thorpeness and Aldeburgh, and the shallow valley of the Hundred River, which stretches inland. The landscape is comprised of Estate Sandlands, Coastal Levels Sand dunes and shingle ridges along the coast and is an expansive, open and windswept landscape. The sense of scale strongly contrasts with the small-scale, sheltered character of the settlements of Thorpeness and Aldeburgh which represent important cultural and historical tourism features.
- 8.19 The flat, open valley floor of Hundred River, which comprises mainly reclaimed drained marshes used for grazing, is divided by regular, reed filled ditches and wetland areas, and dissected by a disused railway embankment which used to connect Aldeburgh with Saxmundham. Within the drained marshes, along the railway and around The Meare) are areas of scrub vegetation which provide visual structure. The open and unsettled area from the coast and landwards to the eastern side of the Fens is designated as part of the Leiston Aldeburgh SSSI as ‘a rich mosaic of habitats including acid grassland, heath, scrub, woodland, fen, open water and vegetated shingle. This mix of habitats in close juxtaposition and the associated transition communities between habitats is unusual in the Suffolk Coast and Heaths.’
- 8.20 Inland, where the railway line bisects the landscape, The Fens comprise part of the Sandlings SPA which is an area dominated by heathland developed on glacial sandy soils, exploited and lost during the 20th century when large areas of heath were planted with blocks of commercial conifer forest and others were converted to arable agriculture. Remnant heath and those restored through conservation work support both acid grassland and heather dominated plant communities with dependent invertebrate and bird communities of conservation value. Woodlark and Nightjar have also adapted to breeding in the large blocks of conifer forest, as well as areas managed as open ground.

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

- 8.21 The area is known for the historic coastal settlements of Thorpeness and Aldeburgh, connected by a straight, unenclosed coast road offering views inland and out to sea. The beach comprises a shingle ridge, and close to Thorpeness, supports rare vegetation. There is a strong focus on recreation and coastal holidays, evident in the caravan parks and the 1900s planned seaside village of Thorpeness. Fishing boats and fresh fish outlets are scattered along Aldeburgh beach and coupled with wooded groynes and Victorian villas give rise to a more settled and urbanised coastal character contrasting with the character further north. There are open views across the water with boating activity focused around the fishing fleets and occasional views to distant container vessels in the North Sea.
- 8.22 The condition of this landscape is affected by the proximity of urban development and high numbers of visitors. Nevertheless it retains a strong and intact character. Changes which are related to tourism can be seen in linear housing development along the coast, pressure for recreational development including caravan parks and access to the coast, and urbanisation of the seafront and beach between settlements. Vegetated shingle habitats are also suffering due to recreational disturbance and beach litter can sometimes be an issue due to the large numbers of people who frequent this stretch of coast.
- 8.23 The priorities for managing the impacts of development on this landscape type are identified in the landscape character assessment as:
- Protect the sense of separation and openness between the settlements of Aldeburgh and Thorpeness and avoid ad hoc and incremental development which urbanises this coastal landscape, particularly along the open coast road.
 - Protect the natural character of the foreshore and its vegetated shingle.
 - Manage use of this area for recreation, protecting nature conservation value, facilitating appropriate access and channelling visitor pressure away from sensitive areas.
 - Manage areas of existing scrub and woodland, protecting the mosaic of habitats and variety of contrasting open and enclosed spaces found in this landscape.
 - Plan for the growth of settlement ensuring that the special qualities of Thorpeness and Aldeburgh are retained.

Thorpeness seafront

- 8.24 The seafront area of Thorpeness represents a gentle transition from the built up area to the open sea. This is achieved by several gaps allowing for views out to the sea from within the settlement, and by extensive open spaces and vegetation, which creates an open and inviting space for visitors and residents. Thorpeness was designed with access to the sea at its heart, and the many paths leading down to the beach are an important element of this area's specific character within the wider village. Proposals close to the seafront should consider the special atmosphere of this part of the settlement.

Key Views

- 8.25 Due to the areas of high quality landscape in the parish, there are a number of important key views both within and between the two main areas of settlement.

Figure 39: Key views in Aldringham (AECOM)



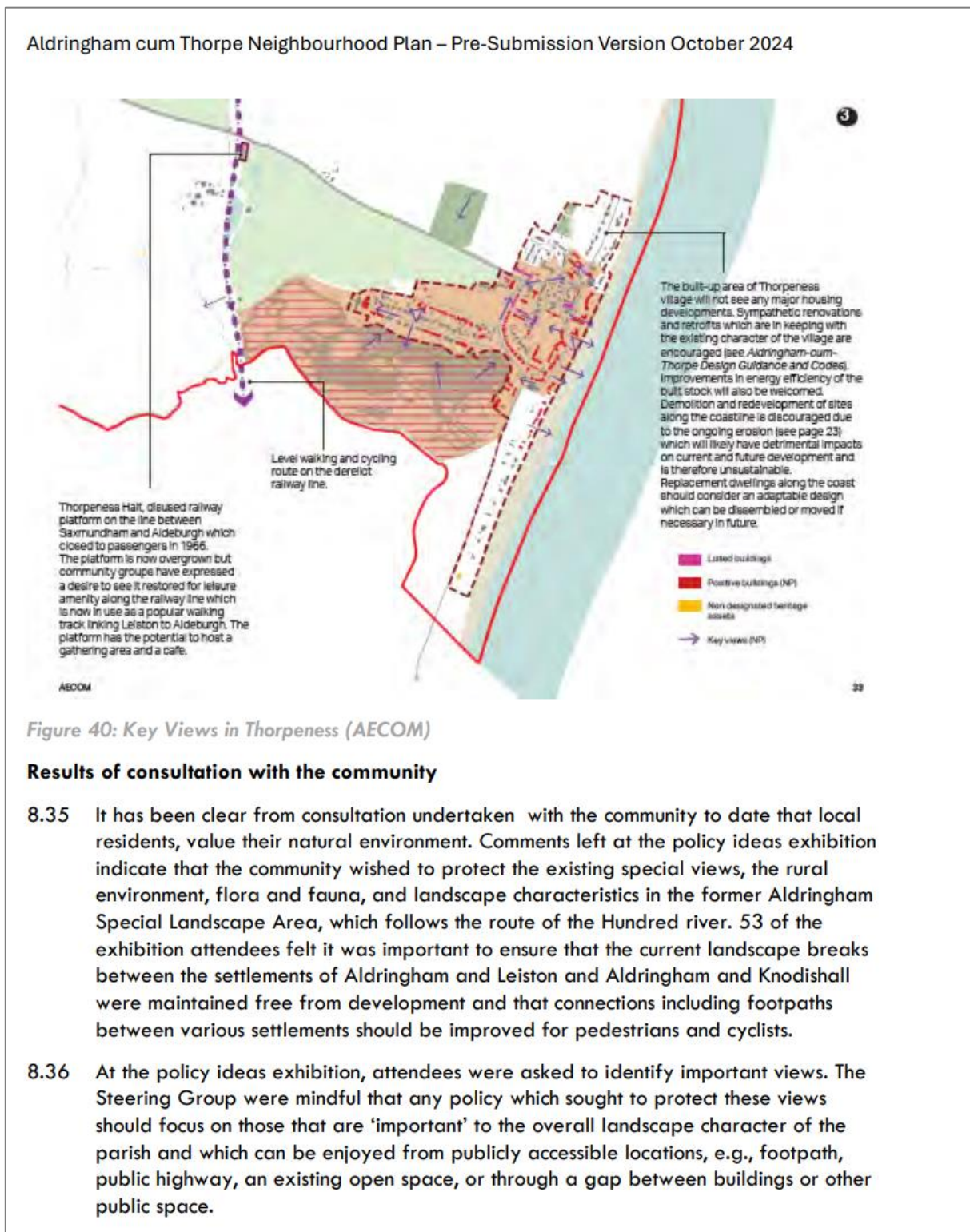
Key Views in Thorpeness

- 8.26 Due to the unique history and evolution of Thorpeness key views have a significant importance. Designed vistas in Thorpeness are an important feature of the settlement. Unlike many Conservation Areas, which developed over a long period, every detail at Thorpeness was planned which allowed buildings to be strategically placed, and long and short views to be included as part of the design process. Key views within Thorpeness fall largely into two categories; those focussed on landmark structures and those relating to landscape. These are shown on Figure X below.
- 8.27 The Whinlands is a clear example of an axial route with the impressive form of The Almshouses providing a focus to the north, and The Meare being visible to the south. Lakeside Avenue is an example of a planned avenue with the Golf Clubhouse located on rising ground and in straight axis with the road. Views are also offered in the opposite direction towards The Haven. From the roundabout, as well as elsewhere along Lakeside Avenue, there are important views of both The Windmill and The House in the Clouds.
- 8.28 A similar effect is created on Westgate. The land rises to the east, and the line of structures either side of the road direct views towards Westbar. The Westbar also forms an impressive structure viewed from the east.
- 8.29 The curving form of The Haven, which heads south and becomes Aldeburgh Road, allows numerous views of The Meare as well as glimpsed shorter views towards The

Aldringham cum Thorpe Neighbourhood Plan – Pre-Submission Version October 2024

Emporium and the treed verges of the road. From The Whinlands, The Margaret Ogilvie Almshouses offers an impressive focal point.

- 8.30 From almost any point within the village, The House in the Clouds and the Windmill can be seen, although closer views of these and other structures, glimpsed between houses and over rooftops, are equally important.
- 8.31 Views of the coastline are best experienced from higher ground as the beach is largely obscured from view by dunes, houses, boundary walls, gardens, and scrub. However there are important glimpses of the sea viewed from the end of Old Homes Road, The Coast Guards, The Benthills, the footpath between Killarney and Sans Souci and the boardwalk between The Shanty and The Cabin. The higher ground of The Benthills also provides clear views of Aldeburgh in the distance.
- 8.32 The open expanse of The Meare is a particularly good vantage point from which to enjoy views of the village and an opportunity to see the winding and climbing forms of The Haven and The Whinlands, as well as glimpses of the Golf Clubhouse and The House in the Clouds.
- 8.33 To the north, where the network of roads and paths are more informal, views are shorter and focussed on buildings and front gardens. These include views northwest up Beacon Hill Lane as well as east along Old Homes Road to The Old Barn. Facing west on Old Homes Road offers a view of both Ogilvie Hall and the village sign.
- 8.34 When approaching from the northwest, along the B1353, the crenelated top to Westbar can be seen over rooftops, and the side of Ogilvie Hall gradually comes into view. A belt of trees close to the north side of the road and behind a low wall largely restricts views of The Almshouses, whereas the gable end of The Dolphin Inn provides a clear focal point. The limited signage and lack of streetlighting and pavements make the views into the Conservation Area feel appealingly unspoilt.





Five Estuaries

Responses to ExQ1 Appendix D:

Extracts from East Bergholt

Neighbourhood Plan

Explanatory note

This Neighbourhood Plan is approved and lasts until 2030, and relevant parts are included in this appendix. These parts include maps of the DVAONB and policies with supporting text which promote the protection of the AONB, its setting and associated views from East Bergholt into the AONB. Policy EB6 and Policy EB9 provide standards and guidance on how developers should approach projects which are directly in, or in the setting of, the DVAONB. The promotion of biodiversity is also a key policy of East Bergholt, covered in Policy EB8. Maps of the Plan's boundaries which show other relevant information are included. Two maps of important viewpoints are included.



2015- 2030

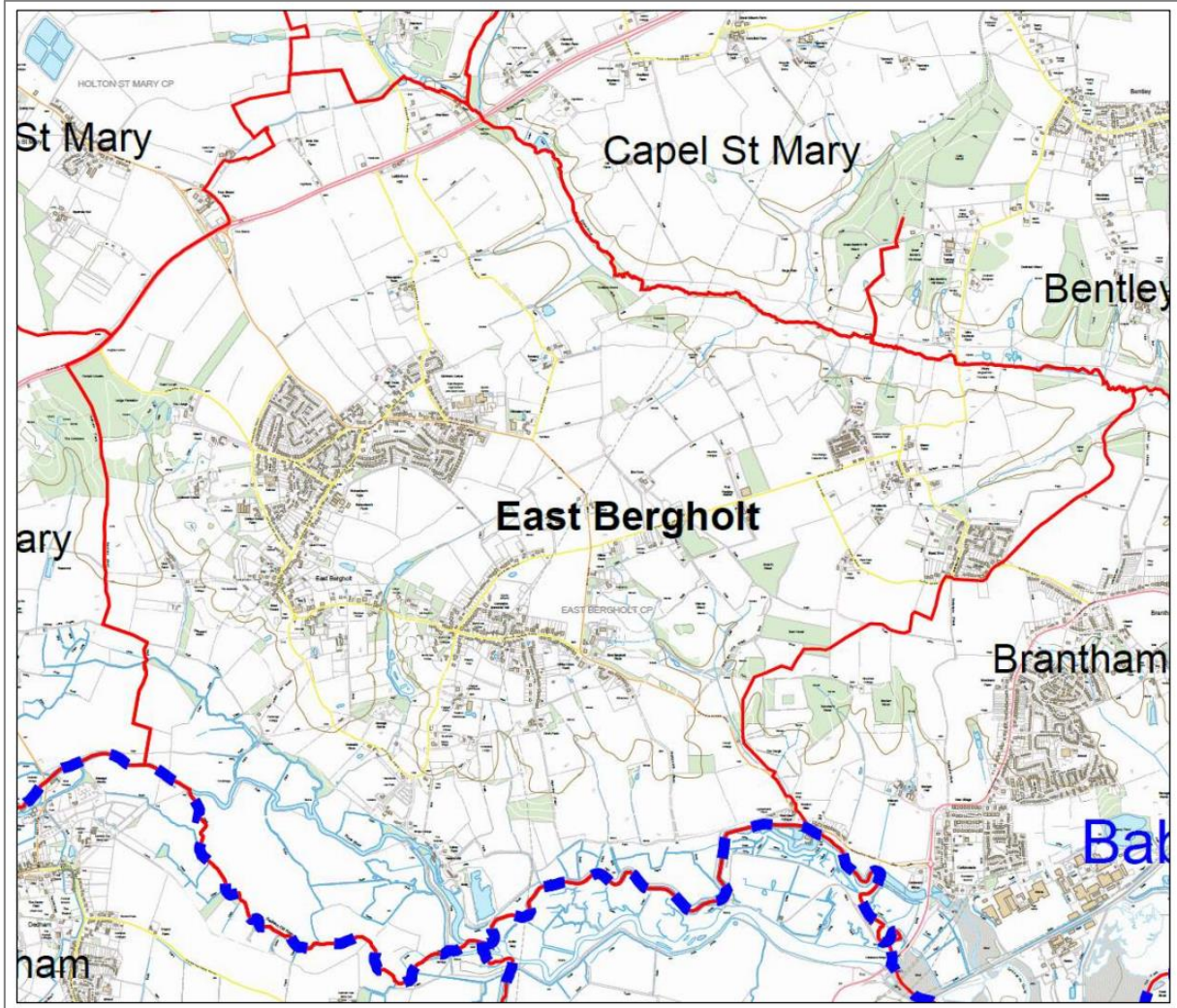


East Bergholt, the birthplace and Suffolk home of John Constable

Version 1.1

Incorporating Examiner's Modifications

July 2016

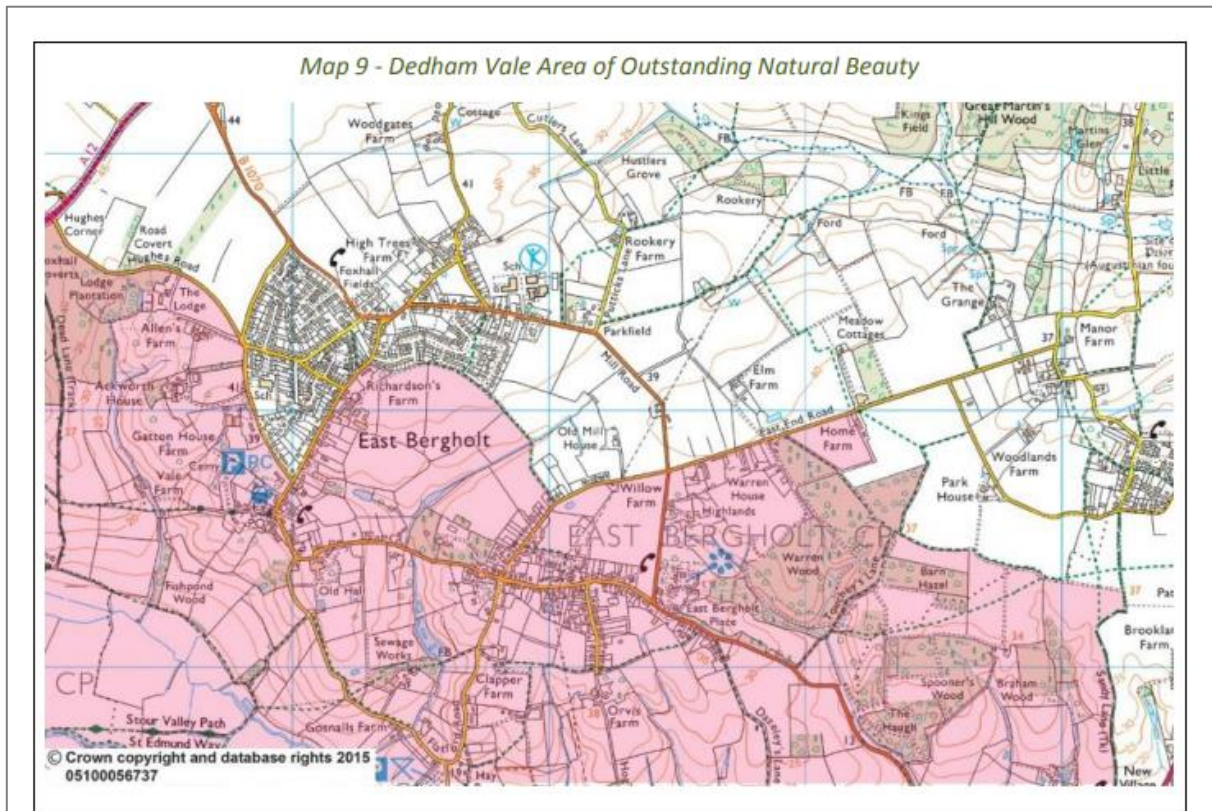


Policy - EB6 Landscape and Views

Development proposals shall demonstrate that they:

1. Comply with the policies and guidance relating to the Dedham Vale AONB and its setting;
2. Where appropriate, satisfy the development tests set out in paragraph 116 of the National Planning Policy Framework;
3. Respond positively to the special qualities and scenic beauty of the Dedham Vale AONB and its setting;
4. Have taken full account of the capacity assessment set out in the Landscape Sensitivity and Capacity Assessment (Map 11) ; and
5. Would not have an unacceptable adverse impact on the landscape setting of the village demonstrated through a Landscape and Visual Impact Assessment

Supporting text for Policy EB6:



132. The Area of Outstanding Natural Beauty (Map 9) includes the west and southern parts of East Bergholt as part of the Stour Valley. The National Planning Policy Framework is clear that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty as these have the highest status of protection in relation to landscape and scenic beauty. The National Planning Policy Framework also states that planning permission should be refused for major developments within an Area of Outstanding Natural Beauty (Map 9) except in exceptional circumstances and where it can be demonstrated they are in the public interest. Therefore if any application for development comes forward within the Area of Outstanding Natural Beauty (Map 9), significant weight should be given to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty (Map 9). Account has been taken of the Dedham Vale and Stour Valley Project Management Plan (<http://www.dedhamvalestourvalley.org/about-us/the-aonb-management-plan/>) as well as relevant policies at District level.

133. The National Planning Policy Framework is clear that the planning system should contribute to and enhance the natural and local environment. As well as protecting and enhancing landscapes and soils, this also means paying attention to biodiversity.

4.3.1 Landscape and Views from Within and Around the Village

135. It is notable that in consultation in the course of preparation of this plan, the character of East Bergholt as “a village not a town” was widely identified as a defining and cherished characteristic (Appendix C.7).

Dedham Vale – John Constable



136. Accordingly, whilst appropriate and sustainable development should be encouraged, it should not be permitted where it would adversely affect that distinctive character.

137. One of the features of East Bergholt which contributes substantially to its character as a village is its setting within the landscape and the fact that it is approached from the A12 to the north through open agricultural land with wide and uninterrupted views. It is enclosed to the east and south

by agricultural land, again offering wide and uninterrupted views. In particular, such views are enjoyed from the Donkey Track across the area of East Bergholt known as the Heath and much used by local residents. Any substantial development which narrows or interrupts these views potentially damages the amenity of the village and the distinctive character of the village in its setting. As discussed above, land to the south and west of the village is included within the Area of Outstanding Natural Beauty (Map 9).

138. It should also be noted that there is a significant distance and a clear separation between the northern boundary of the built-up area of the village and the A12. This is a significant contributing factor towards the sense of East Bergholt being a

Dedham Vale



village set apart from urban areas and other infrastructure in a wide agricultural landscape. Any substantial development of the village towards the A12 and connecting it more closely with the infrastructure of the A12 potentially erodes that sense of a distinctive village which has been identified as being so important by the residents of East Bergholt.

¹³⁹. To support this, the Parish Council has prepared the East Bergholt Views Assessment (Map 10) (Appendices D.19, D.20 and D.21), which identifies the most significant and valued views and is an integral part of the evidence base for this set of policies. It is important to recognise that the village derives its distinctive character from the combined effect of these views and significant weight should be given to preserving them if any development proposal is made which potentially would restrict or interrupt them.

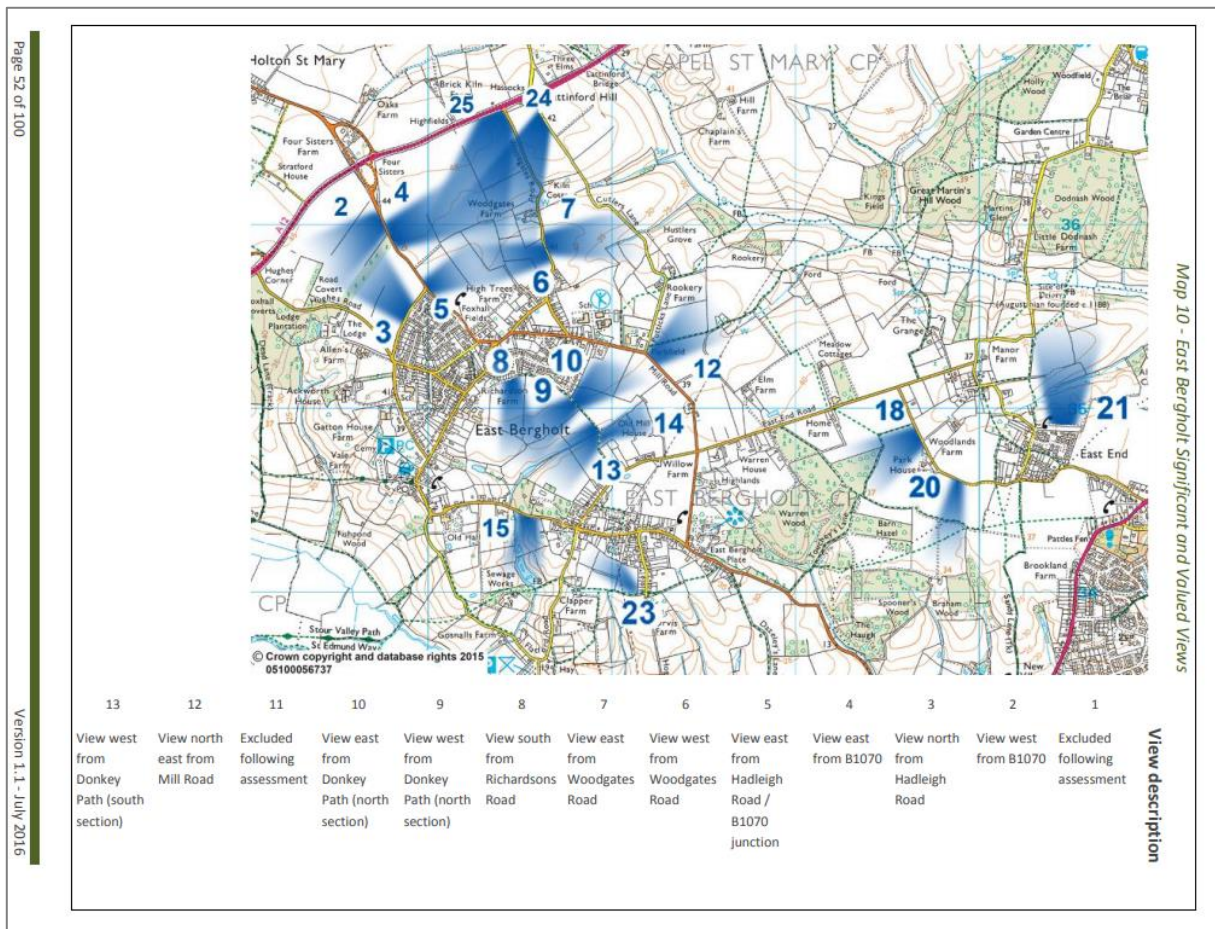
140. The process for compiling the East Bergholt Views Assessment (Map 10) included

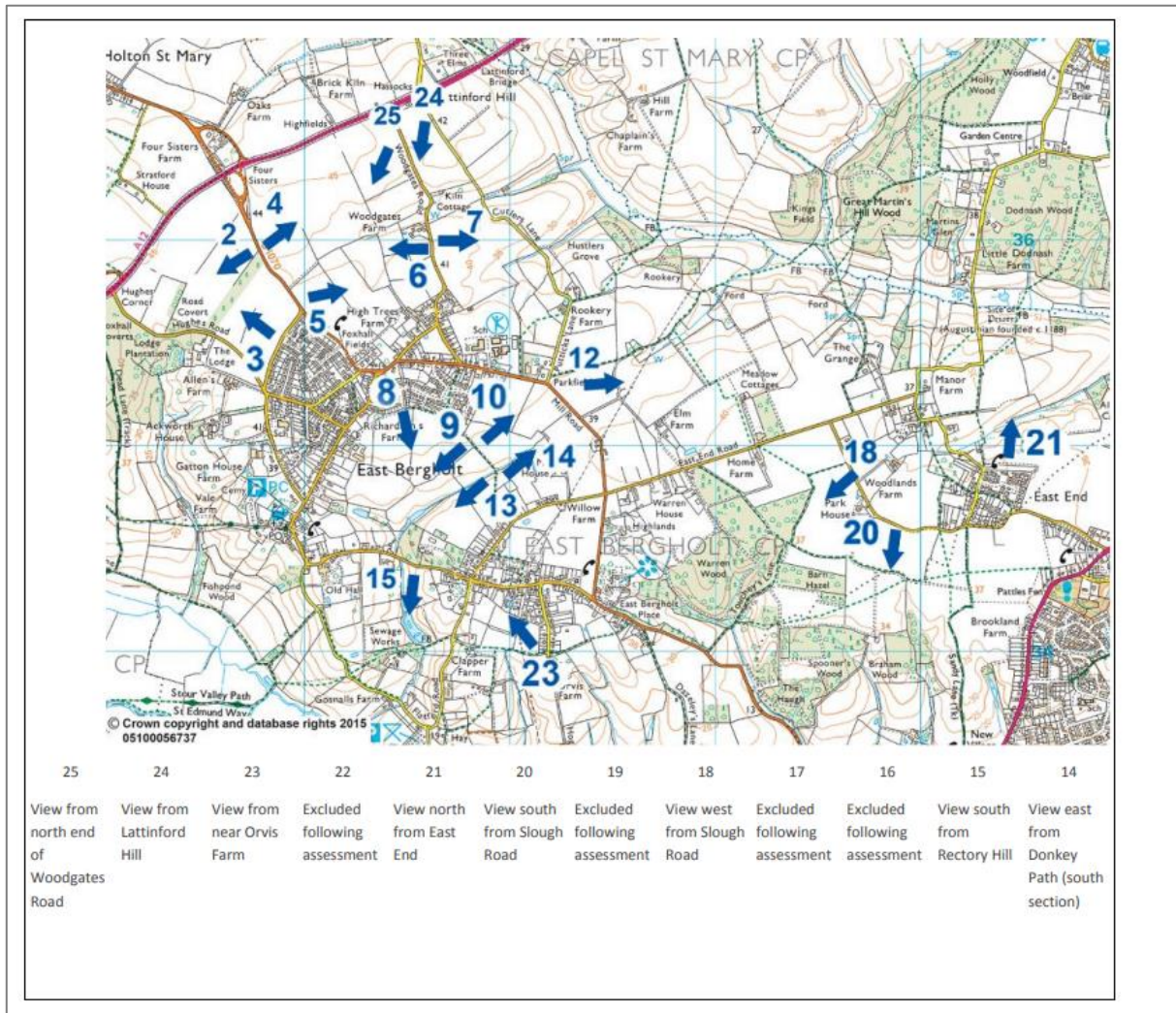
- Initial consultation
- Discussion of views at two open meetings
- Subsequent field survey by members of the Working Group.

141. As part of the field survey a standardised sheet, employing a consistent scoring method, was used to ensure that views were subject to an objective and consistent assessment.

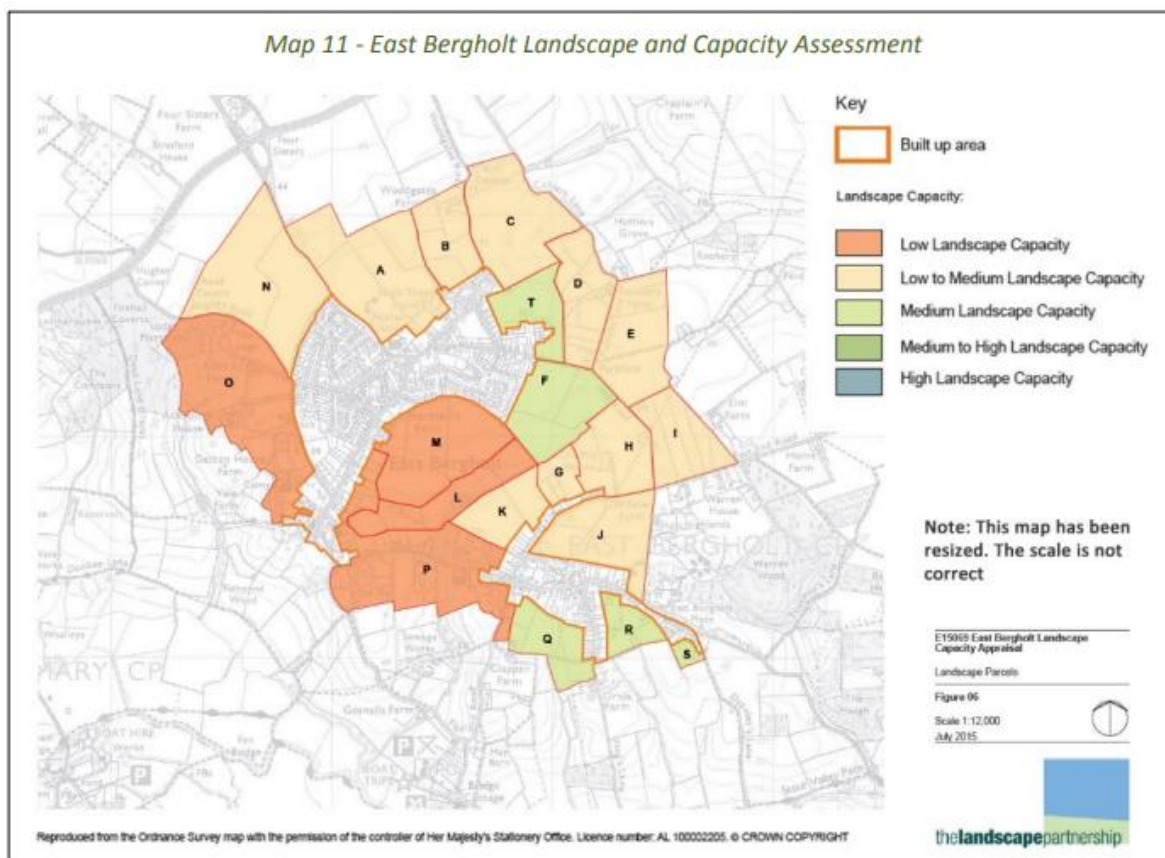
142. In view of the importance of these matters, the Parish Council also commissioned an independent report from The Landscape Partnership. The East Bergholt Landscape Sensitivity and Capacity Assessment (Map 11) follows guidance provided by Natural England (<http://publications.naturalengland.org.uk/file/5769353077194752/>) and assesses identified parcels of land located in the countryside around the village, including some within the area falling within the Area of Outstanding Natural Beauty (Map 9). The characteristics of each area are analysed against the wide range of criteria identified in the Natural England publication, along with other relevant considerations. An assessment is made for each area with regards to its landscape value, sensitivity and its capacity to accommodate development without significant effects on landscape character (landscape capacity). Capacity is assessed as Low, Low to Medium, Medium, Medium to High, or High as appropriate.

143. The conclusions of the East Bergholt Landscape Sensitivity and Capacity Assessment confirm that the countryside within and surrounding the main built-up area of the village comprises rural, intact, high quality landscapes. The majority of the identified parcels of land in the countryside surrounding East Bergholt were found to have only a Low to Medium capacity to accommodate development, based on the assumptions set out in the report. Five parcels were found to have a Medium capacity to accommodate development on that basis and none were found to have a Medium to High or High capacity. The parcels of land which were subject to this report and ratings assigned to them are set out below.





- ^{142.} In view of the importance of these matters, the Parish Council also commissioned an independent report from The Landscape Partnership. The East Bergholt Landscape Sensitivity and Capacity Assessment (Map 11) follows guidance provided by Natural England (<http://publications.naturalengland.org.uk/file/5769353077194752/>) and assesses identified parcels of land located in the countryside around the village, including some within the area falling within the Area of Outstanding Natural Beauty (Map 9). The characteristics of each area are analysed against the wide range of criteria identified in the Natural England publication, along with other relevant considerations. An assessment is made for each area with regards to its landscape value, sensitivity and its capacity to accommodate development without significant effects on landscape character (landscape capacity). Capacity is assessed as Low, Low to Medium, Medium, Medium to High, or High as appropriate.
- ^{143.} The conclusions of the East Bergholt Landscape Sensitivity and Capacity Assessment confirm that the countryside within and surrounding the main built-up area of the village comprises rural, intact, high quality landscapes. The majority of the identified parcels of land in the countryside surrounding East Bergholt were found to have only a Low to Medium capacity to accommodate development, based on the assumptions set out in the report. Five parcels were found to have a Medium capacity to accommodate development on that basis and none were found to have a Medium to High or High capacity. The parcels of land which were subject to this report and ratings assigned to them are set out below.



144. It is important to recognise that both the East Bergholt Views Assessment (Map 10) and the East Bergholt Landscape Sensitivity and Capacity Assessment (Map 11) concentrate on areas within and surrounding the built-up areas of the village and therefore (for reasons of efficiency and to avoid duplication of effort) these reports do not attempt an evaluation of the full extent of the important and valuable views and landscapes which are included within the wider Area of Outstanding Natural Beauty (Map 9), in particular those located towards the west of the village on the flank of the Stour valley. These views and landscapes already enjoy a high level of statutory protection by virtue of their location within the Area of Outstanding Natural Beauty (Map 9) and it is essential that this protection should continue and must not be allowed to be eroded by inappropriate development.
145. The value and sensitivity of the views, landscape and countryside as discussed above and their fundamental importance to the character of the village should be given significant weight in considering any application for development.

4.3.4 Biodiversity

153. There is a statutory duty on public authorities to have regard to the purpose of conserving biodiversity. The Planning Policy Guidance explains that a key purpose of this duty is to embed consideration of biodiversity in formulating policies and in decision-making. The National Planning Policy Framework also provides for the incorporation of provisions to protect and enhance biodiversity within planning policies. This also helps to achieve sustainable development as the National Planning Policy Framework is clear that in pursuing sustainable development, there should be a move from any net loss of biodiversity to the achievement of net gains. Within the context of this Plan the importance of biodiversity is addressed through the following policy.

154. The incorporation of nest bricks for swifts and house martins will be encouraged.

Policy - EB8 Biodiversity

Proposals for development should protect and enhance biodiversity and geodiversity to reflect the requirements of paragraphs 109, 117 and 118 of the National Planning Policy Framework and comply with all the following criteria:

1. Protecting and enhancing internationally, nationally and locally designated sites, protected species and ancient or species-rich hedgerows, grasslands and woodlands;
2. Preserving ecological networks, and the migration or transit of flora and fauna;
3. Protecting ancient trees or trees of arboricultural value;
4. Promoting the preservation, restoration and re-creation of wildlife priority habitats and the protection and recovery of priority species;
5. Providing a net gain in biodiversity;
6. Avoiding potential impacts on the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site. Proposals should demonstrate that ecological considerations have been properly assessed in relation to the application site and those adjacent to it where appropriate. Where necessary appropriate mitigation measures should be carried out. Where adverse impacts on biodiversity cannot be avoided, necessary appropriate mitigation measures or, as a last resort, compensation measures will be carried out as described in paragraph 118 of the National Planning Policy Framework; and
7. In line with paragraph 118 of the National Planning Policy Framework, biodiversity features should be incorporated in and around new developments and biodiversity enhancements added wherever possible.

Policy - EB9 Housing and Non-Residential Design

Proposals must plan positively for the achievement of high quality and inclusive design reinforcing the locally distinctive and aesthetic qualities of the buildings and landscape in the Parish as described in the Character Assessment and follow the Local Design Guidance. The spirit of this guidance is to encourage good design whether it may be historically-derived or in a contemporary idiom.

Any development (whether new build, extensions or alterations) is required to respond to local character and reflect the surroundings. Development should protect or enhance the positive elements of an area, as identified within the Plan's Character Assessment, and proposals must demonstrate that this is the case

Developments in the Conservation Area (Map 18) should preserve or enhance the character and appearance of the Conservation Area (Map 18), whilst developments within the setting of a listed building should not result in harm to that building's significance.

Due to the highest status of landscape protection afforded to AONBs, the highest standards of design will be required for development within the AONB and, where appropriate, its setting. In accordance with paragraph 125 of the National Planning Policy Framework proposals must ensure that light pollution from development avoids negative impacts on the natural environment.

Proposals must submit a statement demonstrating regard for the findings of the Character Assessment and where relevant compliance with the Local Design Guidance.



Five Estuaries

Response to ExQ1 Appendix E:
Extracts from Stutton Neighbourhood Plan

Preface

This Neighbourhood Plan is approved and lasts until 2037, and relevant extracts are included in this appendix. The parts of this plan included as potentially relevant include maps, views and respective assessments relating to the DVAONB, and policies regarding the protection of the AONB. Specifically, Policy SN9, Policy SN10 and Policy SN13 are included due to their relevance to the DVAONB, with maps referenced within the policies also appended. Assessments of “Fringe Character Areas” 3, 4 and 5 are also included, since these areas are within the DVAONB and are within the zone of theoretical visibility of the onshore substation, as identified by the Applicant [APP-180]. A map of the Neighbourhood Plan area is also included.

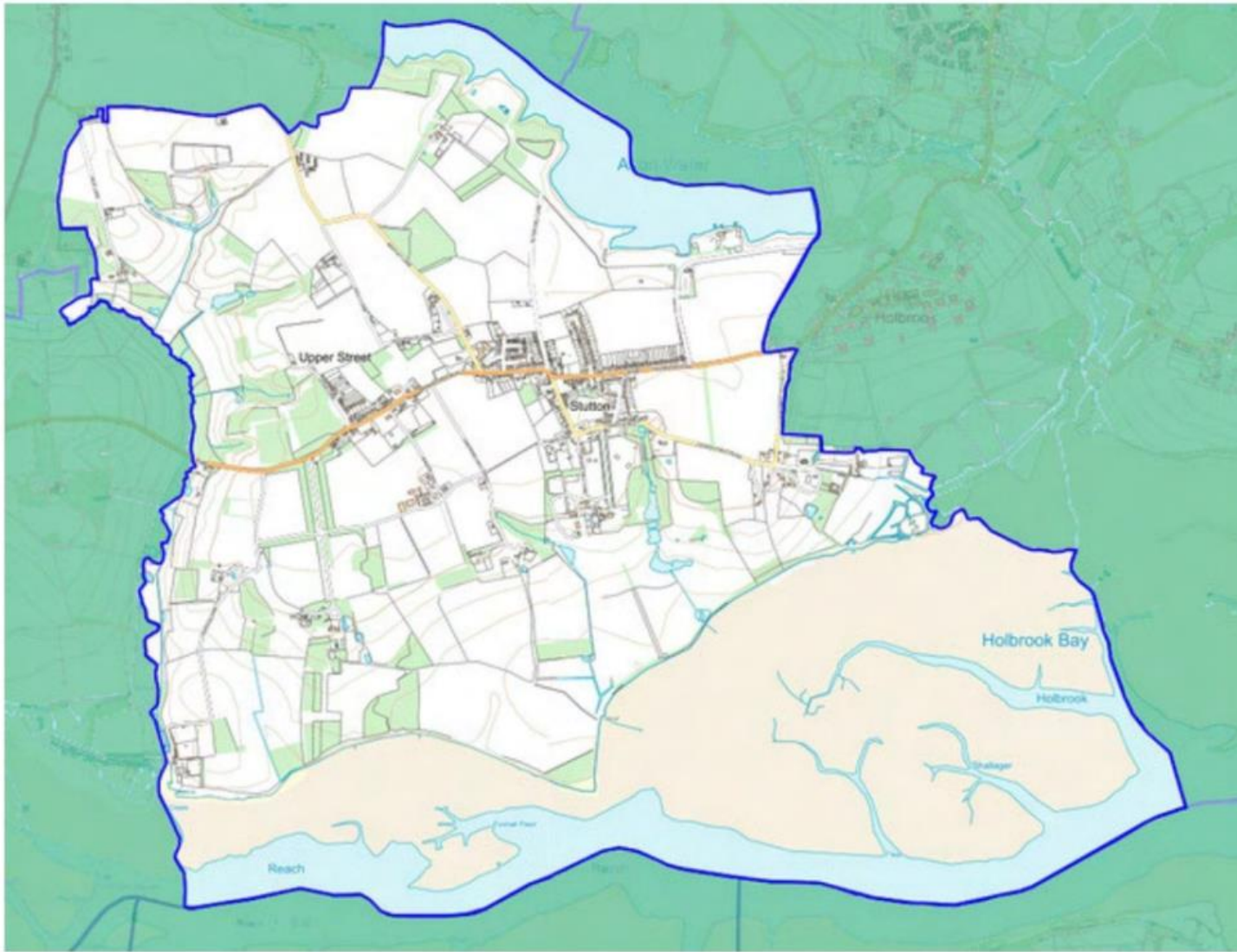
Stutton Neighbourhood Plan 2022-2037

Adopted Version July 2023

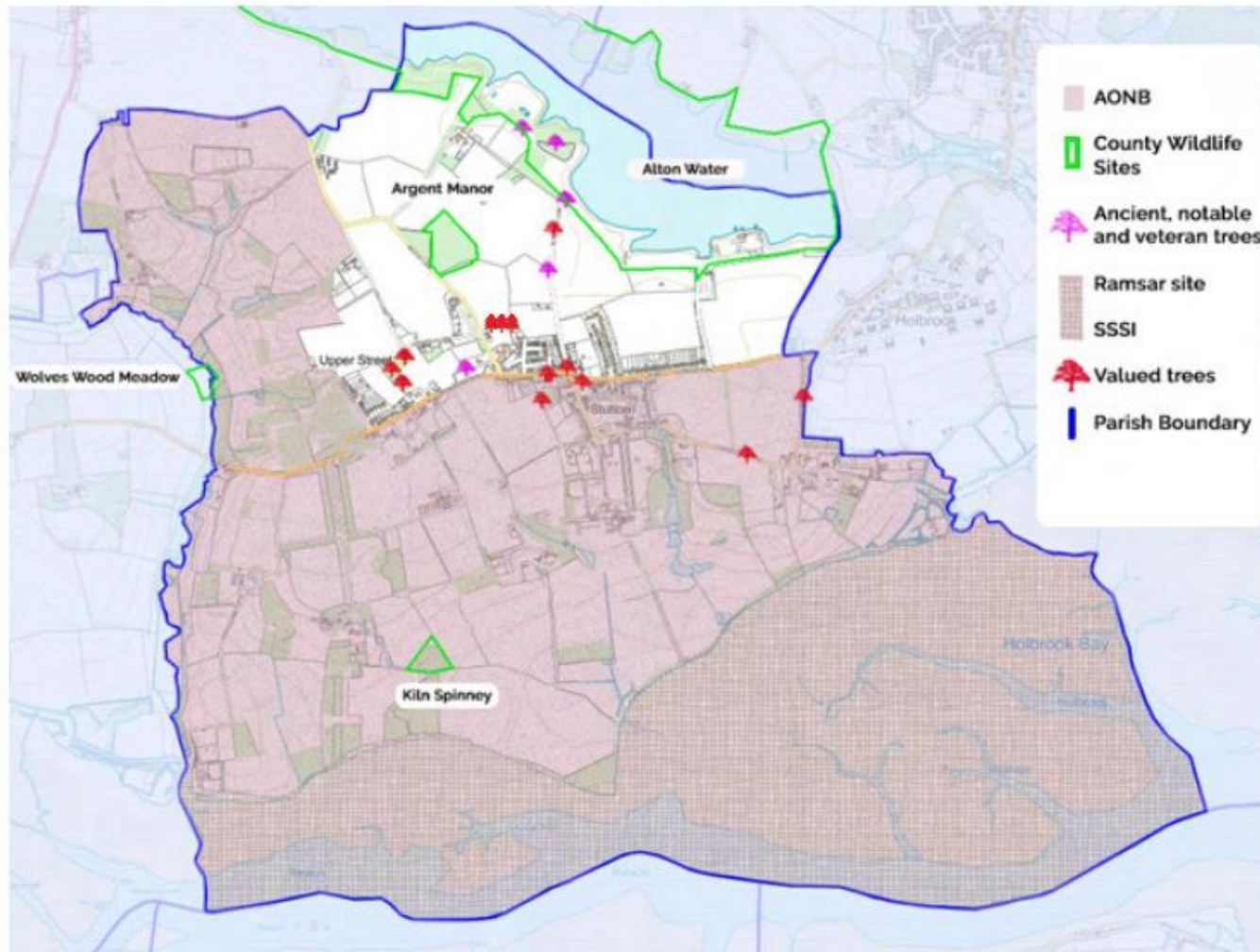
Stutton Parish Council



Map 1 Stutton Neighbourhood Plan Area



Map 3 Landscape Designations and Features



'Valued trees' were identified by village residents during the Big Conversation. 'Ancient, Veteran and Notable' were identified by Suffolk Biodiversity Information Service.

Policy SN9 Stutton Landscape and Settlement Character

All development proposals shall be sensitive to the distinctive landscape, settlement character and features in Stutton, as described in the Landscape Study.

In particular, development proposals:

- must respect and not significantly adversely impact the key views identified on Policy Map SN9A
- should demonstrate how they protect or enhance the landscape features that contribute to local distinctiveness and sense of place, as described in the Stutton Landscape Study and summarised in the supporting text to this policy
- carefully consider boundaries of any new development especially where they interface with the countryside, to ensure they restore or create an appropriate rural edge. Particular care should be taken with development proposals impacting on the visually sensitive settlement edges as shown on Policy Map SN9B
- maintain the general open character of the landscape gap between the main village and Stutton Green indicated on Policy Map SN9B and protect the character of the landscape gap between Upper Street and the main village
- protect or enhance the rural character at key village gateway points shown on Policy Map SN9B, for example, tree planting where this would define and enhance the gateway

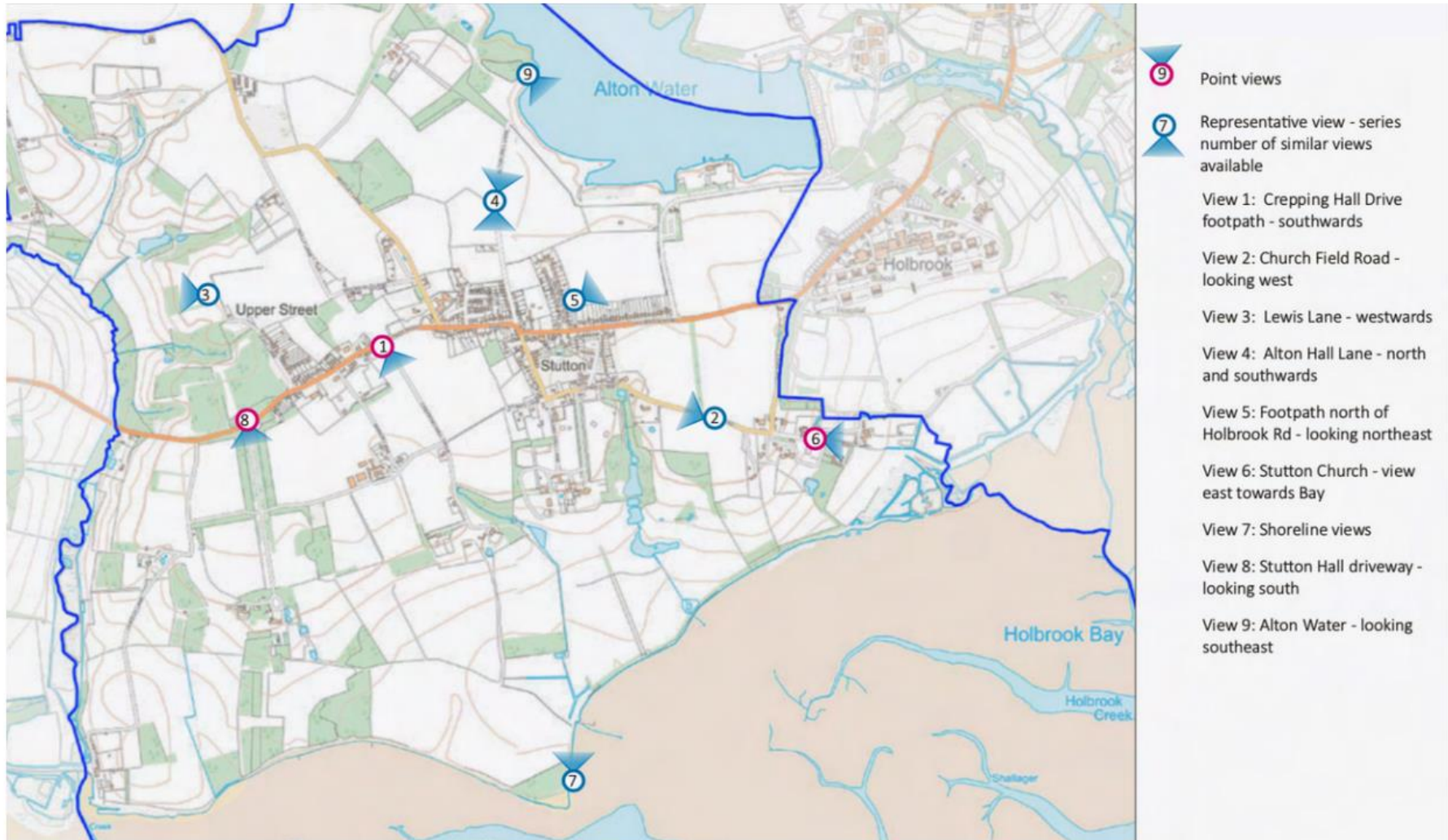
Where otherwise acceptable, proposals will be also supported that enhance the village entrance at settlement edge locations.

Examples of such opportunities include:

- proposals that enhance the village entrance point at Holbrook Road, for example tree planting where this would define and enhance the gateway and help assimilate new residential development
- utilising opportunities, where they arise, to improve the setting of heritage assets along Lower Street

Where potential impacts on Stutton's landscape and settlement character are identified, applicants will be expected to demonstrate accordance with this policy through the provision of an assessment of landscape and visual impacts (proportionate to the scheme proposed) and drawing, in this process, on guidance and recommendations in the Landscape Study. For any schemes proposed in the AONB, Policy SN13 also applies.

Policy Map SNGA Key Views



3. Viewpoint photographs

Important View 1 - Crepping Hall Drive



Location and description:

View southward down the Crepping Hall driveway from the main road giving a wide angle view from the south-east to the south-west. The view comprises the long straight drive, open farmland to either side, with distant wooded skyline, and a big sky seen overhead. The holly lined driveway is a distinctive feature and emphasises the estate farm character. The wooded skyline ahead prevents longer views as far as the estuary.

The view is through parish character area FCA 4.

Justification:

This view is through the designated AONB landscape, it is rural and scenic. It also offers a key local amenity as the driveway is a very well used footpath which connects into a wider network. It offers greatly valued local amenity. Both residents and visitors enter the AONB here and can continue southwards past Crepping Hall to access the estuary - this is a key access point for the River Stour. Visitors park at the nearby village hall.

This view is also experienced by traffic passing between the two settlement clusters. It offers a sudden long view and rural feel after the contained views experienced in the settlement

clusters. The landscape here emphasises the way the village and the farmland interacts and fits into the Suffolk countryside.

Change management objectives:

Protect the unspoilt nature and rural estate farm character of the AONB landscape.

Maintain the openness of the long view and conserve its unspoilt rural character.

Protect the gap between the two village clusters because the expansive rural views provide a distinctive experience at the heart of the village.

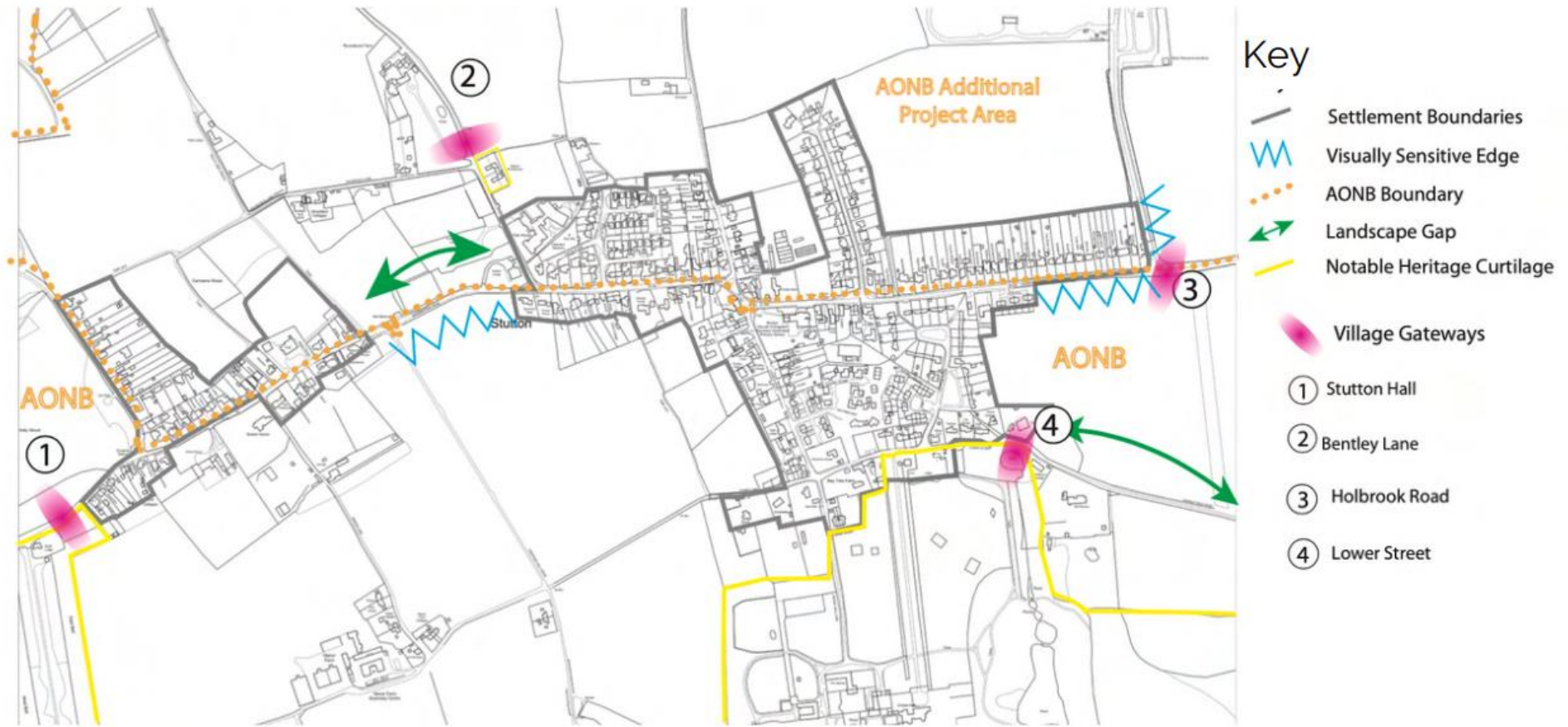
Conserve the special character so that people continue to enjoy recreation in this area - there is a good network of footpaths in the parish that attracts visitors.

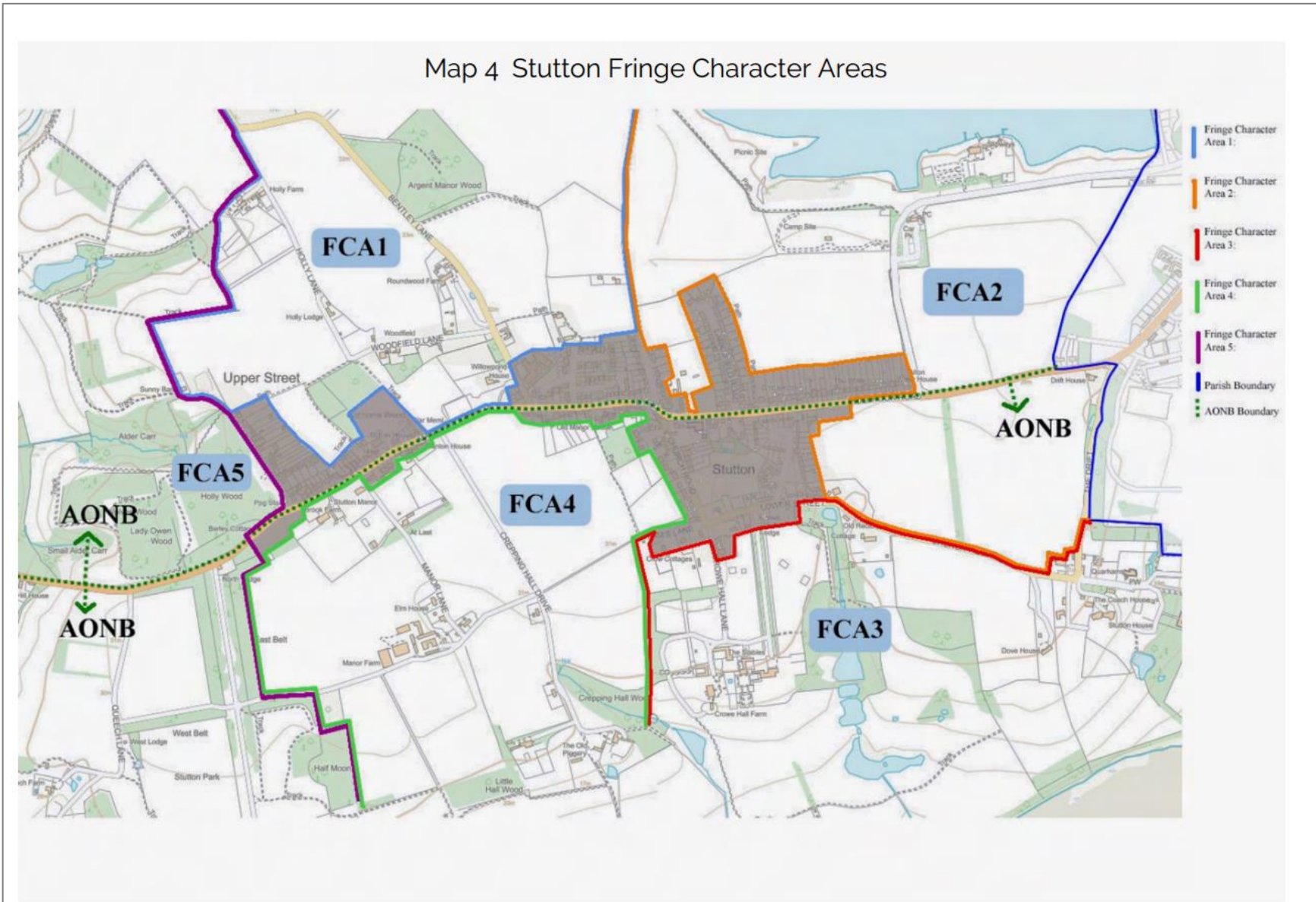
Conserve and manage the holly avenue as a distinctive feature

Maintain a low key approach to signage related to the business park

Maintain the heath and wellbeing benefits offered by the ready access to the rights of way network, and access point for the River Stour.

Policy Map SN9B Landscape Sensitivities





FCA3: Fringe Character Area 3

- 7.21 "This character is dominated by the extensive private designed parkland of historic Crowe Hall and its related estate buildings and enclosures. The extensive grasslands with scattered trees, copses and linear tree features contribute greatly to the AONB landscape. Its interface with the village brings its distinctiveness and a strong sense of the historic landscape.
- 7.22 Public access is not possible so perceptions are limited to the treed skylines seen to either side and this area presents views of large area of undeveloped wooded rural landscape".

Recommendations for change management

The Landscape Study recommends that change management in this character area should account for:

- "Development is generally less appropriate in the AONB"
- "Policy might allow for small scale exceptional innovative design in places where assimilation can be demonstrated. However, there is little opportunity for development into undeveloped land along the village edge"
- "The private ownership of Crowe Hall parkland and its high heritage significance means development is not likely to be a dominant issue in this character area"
- "Development west of the village edge beyond the Old Rectory is not appropriate. It would cause a departure from the more nucleated form of this part of the village and be hard to assimilate"
- "Interpretation boards for visitors could potentially tell the story of Stutton's great houses and gardens even if views of them aren't possible"
- "Future opportunities may arise to enhance the character of Lower Road where its heritage character is weakest"
- "Any new development in this area must seek to integrate within substantial boundary hedges and trees. New boundary planting should only use native species"
- "Vernacular materials (brick, clay tiles, render) are most appropriate although visual prominence can be reduced with use of timber on both elevations and roofs"



"FCA4: Fringe Character Area 4

7.23 "This landscape fringe is an ordered grid of fairly flat land with rectilinear fields divided by tracks and drives. It is high value estate farmland. Some small meadows backing the settlement provide a soft edge to the village. The area is contained and fringed by trees because it is flanked by mature wooded boundaries of parkland to both east and west. The area is important for amenity and offers numerous access opportunities. The holly avenue along Crepping Hall Drive is a distinctive feature and communicates the estate feel of the landscape".

7.24 **Recommendations for change management:**
 The Landscape Study recommends that change management in this character area should account for:

- "Development is generally less appropriate in the AONB. NPPF and Local Plan Policy requires any development to avoid harm to the special character and scenic qualities of AONB landscapes. However small scale, affordable, exceptional or innovative design, can be supported in places where a successful and sympathetic response to landscape and setting can be demonstrated"
- "The undeveloped gap between the main village and Upper Street should be conserved given the visual amenity it offers. Development to link the two clusters, or erode the gap, is not appropriate"
- "There may be opportunities for single plot or very small development to 'mesh' successfully, e.g. where the village edge has indentations, but patterns such as small-scale meadow boundaries or historic hedge lines must be conserved. Detailed work at a site level would need to assess potential impacts of any such proposal"
- "Any development should be attached to the existing village edges. The farmland is more open and visually sensitive and has limited capacity to accommodate development"
- "Any new development in this area must seek to integrate within substantial boundary hedges and trees. New boundary planting should only use native species. Linear forms are appropriate in line with the estate character of the adjacent farmland."
- "Vernacular materials (brick, clay tiles, render) are most appropriate although visual prominence can be reduced with use of timber on both elevations and roof. Large windows likely to spill light into adjacent dark landscapes should be avoided"



FCA5: Fringe Character Area 5

- 7.25 *Land is flat along the village edge then falls towards the west into the tributary of Samford valley, and south towards the estuary. This character is very scenic and is dominated by the parkland setting of Stutton Hall and its wooded estate. South of the main road the character is more formal and geometric, north of the main road it is more organic in form and rural in character as woodland and farmland interact. Apart from the estate buildings settlement is absent. It is an important part of the footpath network, linking walkers down to the estuary from the west side of the village and offers a series of experiences and views finally culminating in the estuary itself and views across the water to Mistley*.

Recommendations for change management:

- 7.26 The Landscape Study recommends that change management in this character area should account for:
- "Development is generally not appropriate in the AONB. Policy is in place to require development to provide protection of its special character"
 - "There is little opportunity for development along this village edge which is mostly woodland. The private ownership of Stutton Hall parkland and high heritage significance means development is not likely to be an issue in this character area"
 - "The western limits are well defined by Stutton Hall. Development west of the existing village edge is not appropriate"
 - "Interpretation boards for visitors could potentially tell the story of Stutton's great houses and gardens even if views of them aren't possible"



Policy SN10 – Enhancing the natural environment

Any new development proposal must meet the requirement to plan positively for the protection, enhancement and creation of networks to improve the connectivity between biodiversity assets and green infrastructure.

In particular proposals must:

- **take measures to avoid or reduce adverse impacts on existing biodiversity assets, such as the strong stag beetle population in Stutton and be assessed by an appropriately qualified ecologist. Where adverse impacts are unavoidable, suitable measures will be required to mitigate any adverse impacts. Where mitigation is not possible, full compensatory provision should be made in accordance with the Mitigation Hierarchy**
- **provide a 10% net gain for biodiversity**
- **appropriately contribute to the creation of biodiversity features through the use of landscaping, building and construction features and sustainable drainage systems (SuDS), and including features such as bird boxes and hedgehog runs**
- **safeguard and enhance the environment for the farmland birds found in Stutton such as grey partridge, turtle dove, yellow hammer, linnets and skylark, all of which are red listed on the new Birds of Conservation Concern 5**
- **safeguard protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006**

Otherwise acceptable development proposals will only be supported where they:

- **achieve net gains in biodiversity which exceed 10% through, for example, the creation of new habitats and the enhancement of existing sites**
- **help to restore and repair fragmented biodiversity networks**

Development proposals should avoid the loss of, or substantial harm to, hedgerow, field boundary, mature or veteran trees or those otherwise identified as features in the [Landscape Study](#).

The scale and extent of development in the AONB will be limited. Any development should be sensitively designed and located taking into account the need to conserve and enhance the landscape and scenic beauty in the AONB as well as consideration of wildlife and cultural heritage'.

Supporting text for Policy SN10:

Views Assessment

7.32 In June 2021, landscape architect Lucy Batchelor-Wylam prepared a [Key Views Assessment](#) of Stutton. The consultant worked together with the Neighbourhood Plan group, who had in turn given opportunities for village residents to nominate important views. From fourteen views initially selected the number was reduced to nine after the working group reviewed the views against the following factors:

- Scenic value relating to the composition of rural views – including complexity, appreciation of topography, depth of field, naturalness, and arrangement of natural and vegetative features
- Number of people likely to be experiencing it – i.e. value relating to shared experience. The more people that experience a viewpoint, the higher the value attributed
- Presence of a landmark feature, perhaps with skyline presence, aiding orientation in the landscape or along a route
- View contributes to the setting of a heritage asset
- Other locally distinctive points of interest or cultural associations that particularly define the character of Stutton
- Views that are indicative of a special 'sense of place' which reflect its intrinsic character and important characteristics

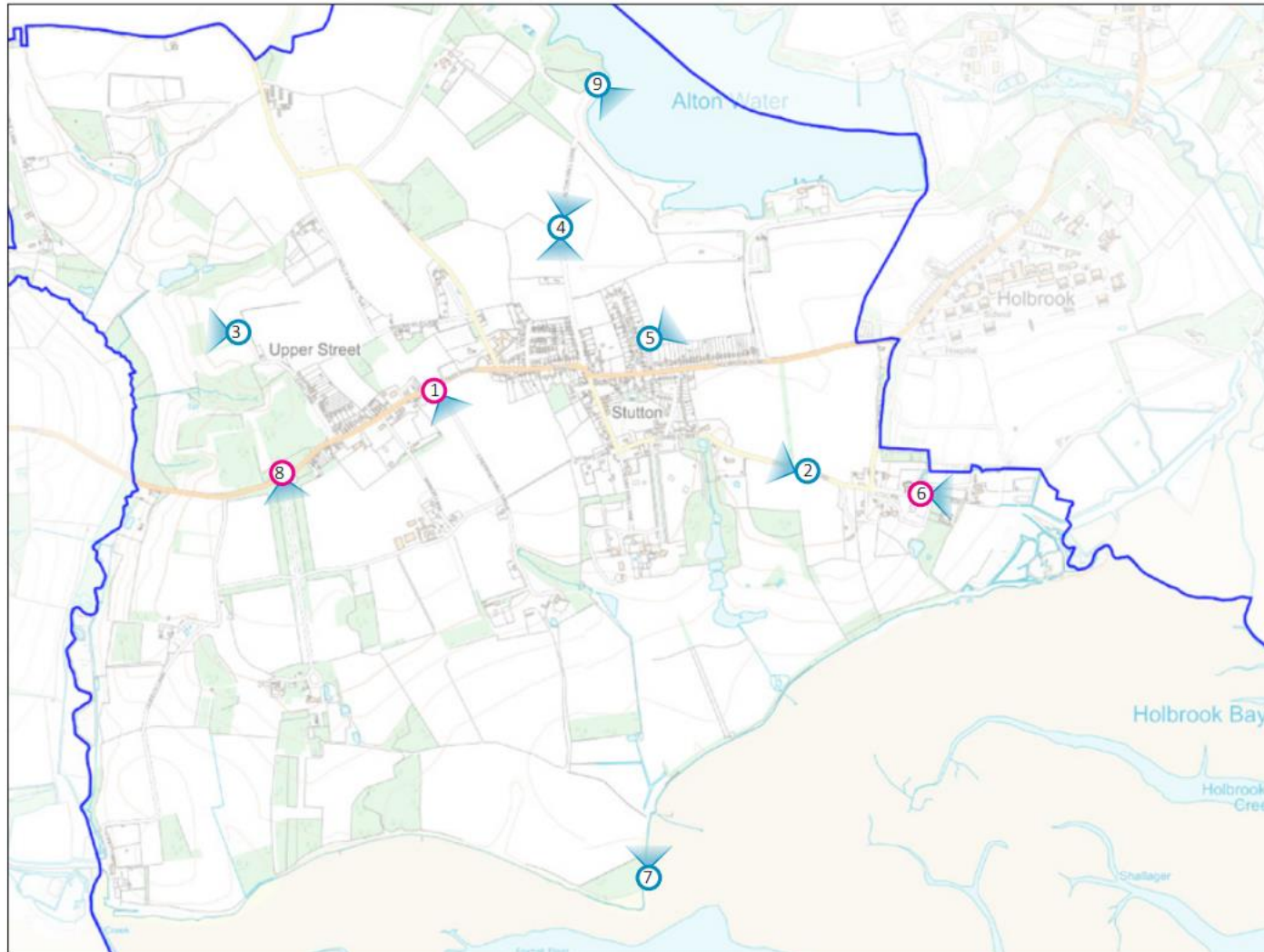
7.33 It should be noted that the defined views are not the only views with special qualities in the parish. There are many other views that contribute to local distinctiveness and rural character and it should not be inferred that other views in the parish have little value. The defined views are held in high public regard and demonstrate particular qualities or features. Each view, together with supporting text, is fully explained in the [Key Views Assessment](#).





The Views are:

- 7.34 View 1: Crepping Hall Drive footpath – southwards. This is from one point and is through the designated AONB landscape. It is rural and scenic. The view is southward down the Crepping Hall driveway (a very well used footpath) from the main road giving a wide angle view from the south-east to the south-west. Please see the 2021 views assessment for a more detailed description.
- 7.35 View 2: Church Field Road. Historic narrow lane offers views (through the designated AONB landscape) towards the village edge en route from Stutton Green. It is particularly rural, tranquil and quiet. Intermittent glimpses of the estuary are possible to the south – this is highly valued as it's one of the only places where public glimpses of the river are achievable from the village edges. Please see the 2021 views assessment for a more detailed description.
- 7.36 View 3: Lewis Lane: View westward (over land now designated as AONB) through farmland from footpath along Lewis Lane. Please see the 2021 views assessment for a more detailed description.
- 7.37 View 4: Alton Hall Lane. View southward from Alton Hall Lane – a quiet, historic, tree-lined lane, also known locally as 'Watery Lane'. The views comprise the lane itself and the tranquil farmland setting on either side. Please see the 2021 views assessment for a more detailed description.
- 7.38 View 5: Footpath north of Holbrook Road. View eastwards across farmland from the village edge towards Alton Water to the north and the clocktower of the Royal Hospital School to the east. Please see the 2021 views assessment for a more detailed description.
- 7.39 View 6: Stutton Church – View over the meadows of the Grade II listed Markwells Farm towards Holbrook Bay. Please see the 2021 views assessment for a more detailed description.
- 7.40 View 7: Estuary Views. A representative shoreline view – from Stutton Ness to the northeast. Views comprise a mosaic of rich visual textures – open water, mud at low tide, shingle and sand beaches, wooded cliffs, rich vegetation communities. Please see the 2021 views assessment for a more detailed description.
- 7.41 View 8: Stutton Hall Drive. View from the main road adjacent to the gatehouse. Please see the 2021 views assessment for a more detailed description.
- 7.42 View 9: Alton Water. A view from the footpath along the reservoir edge southeast to the sailing centre. A block of woodland occupies the centre of the view behind the top of the dam, and a water tower and the RHS clocktower break the skyline and provides orientation. Please see the 2021 views assessment for a more detailed description.

2. Important view locations



List of Important Views:

-  Point views
-  Representative view - series number of similar views available
- View 1: Crepping Hall Drive footpath - southwards
- View 2: Church Field Road - looking west
- View 3: Lewis Lane - westwards
- View 4: Alton Hall Lane - north and southwards
- View 5: Footpath north of Holbrook Rd - looking northeast
- View 6: Stutton Church - view east towards Bay
- View 7: Shoreline views
- View 8: Stutton Hall driveway - looking south
- View 9: Alton Water - looking southeast

Policy SN13 – Conserving and enhancing the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)

The scale and extent of development in the AONB will be limited. Any development should be sensitively designed and located taking into account the need to conserve and enhance the landscape and scenic beauty in the AONB, as well as the consideration of wildlife and cultural heritage.

All development proposals will be expected to be compatible with the management objectives set out in the most up to date Management Plan for the Suffolk Coasts and Heaths AONB.

andscape and Natural Environment

Apart from change of use applications, very minor development and householder proposals, proposals will be expected to be accompanied by a proportionate landscape assessment that provides full justification for the proposal. Proposals should be of a scale and design that do not adversely impact on the AONB designation and show how the landscape and scenic beauty of the AONB and its setting will be conserved and enhanced.

Where impacts are identified, the landscape assessment will demonstrate how these will be mitigated. Applicants will be expected to draw on up to date available guidance relating to appropriate colour palette and protecting dark skies in the Suffolk Coast and Heaths AONB.

Any proposal that is not capable of mitigating the impacts of development will not be permitted.

Context and Evidence	
7.63	The purpose of AONB designation is to conserve and enhance the natural beauty of the landscape. The NPPF seeks to protect national landscape designations from major development: Paragraph 176 states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas...The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".
7.64	Poorly designed development in the setting to an AONB can have a significant impact on the nationally designated landscape. This is recognised in paragraph 177 of the NPPF and in paragraph: 042 Reference ID: 8-042-20190721 of the Planning Practice Guidance (PPG).
7.65	The <u>Landscape Study</u> assesses landscape character in Stutton parish including the areas which fall within the AONB.
7.66	Information on the Suffolk Coast and Heaths AONB is available to view at https://www.suffolkcoastandheaths.org/ . From here the following documents can be accessed: <ul style="list-style-type: none"> • The Suffolk Coast & Heaths Area of Outstanding Natural Beauty Management Plan 2018 to 2023 – this sets out a series of objectives for managing the AONB. • The Suffolk Coast & Heaths Area of Outstanding Natural Beauty Guidance on the selection and use of colour in development
Landscape and Natural Environment	
7.67	A character assessment of the National Character Area in which the AONB sits is provided by Natural England at http://publications.naturalengland.org.uk/publication/5626055104659456 (see National Character Area 82 Suffolk Coast and Heaths).
7.68	Light pollution is a serious emerging issue in protected landscapes, and the areas immediately adjacent to them, and has important implications for the planning and design of development. Poor lighting can detract from the architectural appearance of a building and may produce glare which can conceal rather than reveal. Inefficient lighting can be a waste of energy, thus a waste of money and resources.
7.69	The British Astronomical Association's Campaign for Dark Skies states that councils and organisations should use 'the right amount of light and only where needed, to help stargazers. Also, of relevance is the Joint Babergh and Mid-Suffolk District Council Landscape Guidance (August 2015) which requires any development to consider and mitigate its impact on the dark skies character of the countryside.



Five Estuaries

Response to ExQ1 Appendix F:
Extracts from Babergh and Mid Suffolk
Joint Local Plan

Policy LP09 - Supporting A Prosperous Economy

- 1. Proposals for employment use must:**
 - a. Be sensitive to the surroundings, including any residential and other amenity, landscape and heritage assets;**
 - b. Demonstrate a high standard of design;**
 - c. Where necessary, provide contributions to the enhancement of the digital infrastructure network; and**
 - d. Demonstrate a safe and suitable access for all users, sufficient on-site parking and that it will not have a severe impact on the road network.**

- 2. Change of use to small scale employment within a residential curtilage is supported where:**
 - a. There are no direct sales from the site;**
 - b. The direct and indirect effects of the scale of the business activity, including the employment of non-residents at the business, must remain incidental to the overall use of the site for residential purposes;**
 - c. The hours of operation are compatible with residential use; and**
 - d. The business does not create noise, dust, fumes or other emissions, outdoor storage or frequent delivery/collection that are likely to give rise to significant adverse impacts on health, quality of life or local amenity.**

Policy LP09 Supporting Text:

LP09 - Supporting a Prosperous Economy

Policy background and explanation

- 14.01 The purpose of this section is to provide a planning framework which;
- I. Encourages the development of employment uses of the right type, in the right place.
 - II. Encourages investment by supporting the delivery of infrastructure improvements that will support the continued growth of the Port of Felixstowe and strengthen the Districts' links to the Port and the rest of the UK.
 - III. Supports the tourism sector.
 - IV. Provides flexibility to be responsive to changing behaviours, innovation and sectoral advancements to enable business to be competitive and improve productivity.

Supporting A Prosperous Economy

- 14.02 The economic base of the Districts comprise a wide range of employment sites and units ranging from the large strategic employment sites to small sites, often occupied with small and medium sized enterprises (SMEs), located across the Districts and sometimes outside settlement boundaries. Many sites have grown organically over time responding to changes in demand and new opportunities. The aim of the Plan is to maintain a suitable diversity of employment sites to meet current and future economic needs in a sustainable way.
- 14.03 The Plan also provides flexibility to support small scale employment use and flexible working practices. The predominantly rural nature of the Districts means that there are many small scale businesses, often within agricultural complexes and also within residential curtilages in both the towns and the wider countryside. This is an important component of the Districts' economic sustainability and diversity. The purpose of the policy is to provide a consistent framework to enable such uses to be regularised where it is considered necessary and appropriate to do so.

Policy LP17 - Landscape

- 1. To conserve and enhance landscape character development must:**
 - a. Integrate with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements;**
 - b. Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and**
 - c. Consider the topographical cumulative impact on landscape sensitivity.**
- 2. Where significant landscape or visual impacts are likely to occur, a Landscape and Visual Appraisal (LVA) or a Landscape and Visual Impact Assessment (LVIA) must be prepared to identify ways of avoiding, reducing and mitigating any adverse effects and opportunities for enhancement.**

Policy LP17 Supporting Text:

LP17 - Landscape

Policy background and explanation

- 15.19 The landscape and the historic environment have a strong inter-relationship, as the character of the landscape is influenced by its historic environment, as well as traditional villages and historic townscapes. Equally, the landscape can be important to the setting of a historic asset.
- 15.20 All landscape whether designated or not, has its own character, sense of place and local values. These include areas with uninterrupted or panoramic views of surrounding landscapes, landmarks and distinctive field patterns with associated hedges, woodlands and copse of trees, as well as areas of tranquillity, dark skies and strong rural character.
- 15.21 Landscape character assessments of the area have been carried out and provide information on the different landscape character types of the area²⁷. These assessments recognise particular characteristics, qualities and features of landscapes to provide an understanding of distinct sense of place and sensitivities to development and change. They will be used as a basis to guide decisions about whether development is appropriate in the landscape and provide a framework for the provision of appropriate landscape mitigation and enhancement.
- 15.22 The Plan seeks developments to be sensitive to their landscape and visual amenity impacts; subject to siting, design, lighting, use of materials and colour, along with the associated mitigation measures.
- 15.23 Where development is visually prominent or is likely to significantly affect landscape character, production of a Landscape and Visual Appraisal (LVA) or Landscape and Visual Impact Assessment (LVIA) (as appropriate) will be required. This should inform strategic landscape masterplans and/or landscape management plans detailing mitigation proposals if required.
- 15.24 The Plan seeks to conserve and enhance the landscape, taking account of its natural beauty, characteristics and features of natural, archaeological or historic interest. All new development proposals need to ensure they respond to and reinforces the local distinctiveness of the area in scale, form, design, materials and location. For example, by use of materials which complement the local individual landscape character, archaeological and historic patterns of settlement and land use and designations; being demonstrably informed by local guidance, in particular the Councils' Joint Landscape Guidance, the Suffolk Landscape Character Assessment and Settlement Sensitivity Assessment.

Policy LP18 – Area of Outstanding Natural Beauty

- 1. Proposals for major development²⁸ within the AONBs will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.**
- 2. The Councils will support non-major development within the AONBs and development within the setting²⁹ of the AONBs that:**
 - a. Gives great weight to conserving and enhancing the landscape and scenic beauty;**
 - b. Integrates positively with the character of the area and reinforces local distinctiveness of the AONBs;**
 - c. Is sensitive to the natural and built landscape and visual impacts (including on dark skies and tranquil areas);**
 - d. Supports the provision and maintenance of local services, facilities and assets (including affordable housing), so long as it is commensurate with the character and objectives of the AONBs;**
 - e. Demonstrates special regard to conserving and enhancing landscape character, landscape values and heritage assets in the AONBs; and**
 - f. Conserves the distinctiveness of the AONBs (including quality views), supports the public enjoyment of these areas and the wider social and economic objectives set out in the AONB Management Plans.**
- 3. Development within the AONB Project Areas should have regard to the relevant Valued Landscape Assessment.**

²⁸ Major Developments as defined within NPPF 2021 – “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”.

²⁹ Setting is considered to impact on the purposes for which the area has been designated or defined in the opinion of LPA.

Policy LP18 Supporting Text:

LP18 – Area of Outstanding Natural Beauty

- 15.25 Babergh and Mid Suffolk have a diverse landscape character, with parts of Babergh lying within Dedham Vale AONB and the Suffolk Coast and Heaths AONB. Adjoining the Dedham Vale AONB is an area defined as the Stour Valley Project extending beyond Sudbury and into West Suffolk. The Suffolk Coast and Heaths AONB also has a project area which encompasses the Shotley Peninsula. Whilst these project areas do not benefit from the same protection as the AONBs, development proposals in these areas should conserve their special qualities as identified in the Valued Landscape Assessments, and where relevant seek to deliver enhancements where the special qualities have been impacted by changes in farming practices or previous development.
- 15.26 The conservation of AONBs includes its setting. In line with the National Planning Policy Framework great weight is given to conserving and enhancing the landscape and scenic beauty in the AONBs and the conservation and enhancement of wildlife and cultural heritage are important considerations.
- 15.27 The Plan requires development to be sensitive to landscape character and visual amenity impacts. This could be achieved through the use of good built and landscape design, including materials and colour, siting, design and lighting, along with the associated mitigation measures which complement the local individual landscape character, archaeological and historic patterns of the settlement.

Policy LP29 - Safe, Sustainable and Active Transport

- 1) All developments will be required to demonstrate safe and suitable access
- 2) Development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth, whilst protecting and enhancing the Public Rights of Way network.
- 3) All development should be informed by the relevant parking guidance⁴⁰, with adequate access for servicing and emergency vehicles.
- 4) Where necessary, development will be expected to provide home to school transport contributions.
- 5) Development proposals that are expected to, or likely to cause a significant increase in transport movements must:
 - a) Be supported by a transport statement and if appropriate a transport assessment⁴¹; and
 - b) Provide a travel plan informed by the relevant County⁴² / National Guidance to mitigate the highway impact of development and maximise sustainable transport modes.
- 6) Significant impacts on highway safety or the function of the highway network must be mitigated. Impact on highway safety must not be unacceptable and the residual cumulative impacts on the road network must not be severe.

⁴⁰ Currently the Suffolk Guidance for Parking (updated May 2019)

⁴¹ Indicative thresholds: a transport statement will be required for residential developments between 50 and 80 dwellings and a transport assessment should accompany residential developments of over 80 dwellings, however other circumstances will also be considered. Non-residential development will be considered on a case by case basis. The scope of transport statements and assessments should extend across administrative boundaries of the LPA where it is appropriate to do so.

⁴² <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

Policy LP29 Supporting Text:

LP29 - Safe, Sustainable and Active Transport

Policy background and explanation

- 16.09 This policy has aims to ensure accessibility for all and to deliver sustainable development. It also seeks to provide a suitable policy framework for more detailed considerations of planning around transport and accessibility.
- 16.10 The National Planning Policy Framework states that developments that will generate significant amounts of traffic should provide a travel plan, to set out measures to facilitate sustainable modes of transport. SCC have produced new guidance for Travel Plans, for use as a material planning consideration. Furthermore, the National Planning Policy Framework, paragraph 34 states that:- 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).'
- 16.11 With regards to home to school transport contributions, these are already being secured through the planning process, where relevant to the development. This is done in accordance with the Department for Education (DfE) publication 'Securing developer contributions for education' (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations (revised March 2019). It is therefore appropriate for the policy to require development contributions to provide for home to school transport where necessary.
- 16.12 The health benefits of 'Active Transport' are widely understood and supported, as such Sport England have published 'Active Design' which seeks to promote sport and physical activity in new and existing developments, to create an active environment, through designing and adapting where we live to encourage activity in everyday lives. The Councils have also published a Local Cycling and Walking Infrastructure Plan (LCWIP), which identifies opportunities for cycling and walking improvements at a local level.
- 16.13 Development should have regard to the most recent County Council Rights of Way Improvement Plan.

SP05 – Employment Land

- 1) In order to support and encourage sustainable economic growth (i) the designated strategic employment sites (as identified in Table 6 and on the Policies Map) shall be protected and employment uses within them will be supported in principle; and (ii) other land used for employment purposes shall be protected for ongoing employment use, unless such use is convincingly demonstrated to be unviable.**
- 2) The ongoing regeneration at Brantham and at the Former Sproughton Sugar Beet Factory regeneration sites is supported. Development at the Brantham site must be sensitive to the estuarine/coastal location, which is in close proximity to the AONB, in relation to landscape, biodiversity, potentially flood risk, and, where relevant, the historic environment. This site could offer significant potential for biodiversity net gain as well as landscape enhancements to reflect its location close to the AONB and coast. Similarly, regeneration at the Former Sproughton Sugar Beet Factory, must be sensitive to landscape, biodiversity (with consideration given to potential for biodiversity net gain) and heritage assets.**
- 3) Where appropriate, conditions will be applied to Use Class E developments to control the uses which can be operated.**
- 4) In determining applications for new employment development weight shall be given to proposals which make provision for skills and training packages which are supported by the relevant LPA.**
- 5) To ensure a deliverable supply of employment sites to accommodate the changing needs of the economy, development of other land for employment uses along the strategic transport corridors (as defined in the glossary) shall be supported in principle, subject to:**
 - a. The applicant demonstrating that any proposal is deliverable and would enhance provision which cannot be accommodated on existing strategic employment sites;**
 - b. All proposals demonstrating adequate highway capacity and access with sufficient on-site parking;**
 - c. Ensuring provision of accessibility to public transport, including walking and cycling provision;**
 - d. The site design and layout being sensitive to the surroundings, including any landscape, heritage and biodiversity assets;**
 - e. Prioritisation being given to development on previously development land; and**
 - f. All new buildings demonstrating a high standard of design, by having regard to the relevant policies of the Plan.**
- 6) Any application for non-domestic proposals requiring heavy water usage across the two Districts will be required to demonstrate that sufficient water capacity is available through a Water Supply Management Statement in liaison with the relevant water supply company. Any use of this nature in the Hartismere Water Resource Zone (Mid Suffolk District) will be prohibited until confirmation of sufficient water capacity by the relevant water supply company (currently anticipated from 2032).**

Policy SP05 Supporting Text:

10 – THE ECONOMY**Economic****Economic Growth**

- 10.01 Across Babergh and Mid Suffolk there is a diverse network of employment sites of different sizes and locations with wide ranging suitability for different employment uses. The sites include large strategic sites which are concentrated along the transport corridors and on the edge of the towns, as well as smaller scale business estates and many other sites located throughout the Plan area, many of which are on diversified farmland. It is important that the diversity of sites is maintained to accommodate the wide-ranging requirements of employers and industries located in the Districts.
- 10.02 The Employment Land Needs Assessment (2016) identifies that Babergh and Mid Suffolk have modest net additional employment land requirements equating to approximately 2.9 Ha in Babergh and 9.4 Ha in Mid Suffolk, up to 2036. In quantitative terms, there is considered to be adequate land supply through vacant land (20.1 Ha in Babergh and 109.8 Ha in Mid Suffolk) on strategic employment sites to meet the additional employment land requirements over the Plan period. In addition to the designated sites in Table 6, there are further employment sites which have been granted planning permission along the strategic transport corridors (as defined in the glossary).
- 10.03 Whilst the baseline land forecast indicates modest employment land requirements, it is important that there is sufficient policy flexibility to meet sustainable economic demands over the Plan period. At the same time, it is also important to continue to support the retention and improvement of the network of established sites of varying sizes located across the Districts. Flexibility to accommodate net growth, to enhance the employment provision for uses that cannot be accommodated upon the existing strategic employment sites, is important to securing the future prosperity of the area.
- 10.04 In total, the strategic employment sites cover approximately 190 Ha in Babergh and 440 Ha in Mid Suffolk, as shown in Table 6. In Babergh, there are two key regeneration sites in employment use. One is at Brantham located on the Stour Estuary, and one is at Sproughton (the former Sugar Beet site) located on the A14 corridor, the latter also being a strategic employment site.

Table 6: Strategic Employment Sites and Gross* Areas

Site No.	Site Name	Total Site Area (Ha)	Vacant Land (Ha) (as at Nov 2022)
Babergh			
1	Acton – Bull Lane	11.8	0
2	Hadleigh – Lady Lane	22.9	0.5
3	Raydon – Notley Enterprise Park	11.2	0
4	Sproughton – Farthing Road	20.9	0
5	Sproughton Former Sugar Beet Factory	35.5	17.2
6	Sudbury – Chilton Industrial Estate, Delphi Site, Church Field Road and Northern Road	69.8	2.4
7	Sudbury – Wood Hall Business Park	9.4	0
8	Wherstead Business Park	7.2	0
Babergh Sub-Total		188.7	20.1

Site No.	Site Name	Total Site Area (Ha)	Vacant Land (Ha) (as at Nov 2022)
Mid Suffolk			
9	Eye Airfield	140.8	11.0
10	Great Blakenham – Gipping and Claydon Business Park	44.2	0
11	Needham Market – Lion Barn	17.4	3.4
12	Stowmarket – Charles industrial Estate	2.2	0
13	Stowmarket – Gipping Employment Corridor	111.9	4.1
14	Stowmarket – Mill Lane / Gateway 14	79.3	79.3
15	Woolpit – Brickworks	4.4	0
16	Woolpit Business Park	10.7	2.3
17	Woolpit – Lady’s Well	11.8	1.5
18	Woolpit – Lawn Farm	17.1	8.2
Mid Suffolk Sub-Total		439.8	109.8
Total		628.5	129.9

* Gross includes developable areas for employment uses as well as areas of constraint such as access roads, landscaping, and areas of flood risk.

10.05 It is important that the flexibility to enable economic investment is balanced with the need to safeguard and encourage investment and improvements to the existing network of employment sites, which have a central role in supporting economic activity across Babergh and Mid Suffolk. Proposals for net additional (new) employment land should enhance the economic potential of the Districts and not jeopardise the ongoing retention of the existing employment uses. There is a need to ensure that employment opportunities exist throughout the Districts, to help to support sustainable communities and reduce the need for out-commuting. The economic importance of supporting the retention of existing sites across the Districts remains vital to the ongoing economic sustainability of many settlements. Cumulatively these sites support the economic sustainability of Babergh and Mid Suffolk. Detailed policies to secure the diversity in the type, scale and location of employment sites are set out in the Non-Strategic Local Policies of the Plan.

10.06 Through the production of the Water Cycle Study, Essex and Suffolk Water commented that the supply headroom in the Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development. It has been identified that additional supply capacity will not be available before 2032 at the earliest.



Five Estuaries

ExQ1 Appendix G:

Extracts from East Suffolk Council, Suffolk
Coastal Local Plan

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects

In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities.

The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership, service providers, public bodies and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any Major Infrastructure Projects as outlined in Table 3.6.

Proposals for Major Energy Infrastructure Projects across the plan area and the need to mitigate the impacts arising from these will have regard to the following policy requirements:

- a) Relevant Neighbourhood Plan policies, strategies and visions;
- b) Appropriate packages of local community benefit to mitigate the impacts of disturbance experienced by the local community for hosting major infrastructure projects;
- c) Community safety and cohesion impacts;
- d) Requirement for a robust Environmental Impact Assessment
- e) Requirement for a robust Habitats Regulations Assessment;
- f) Requirement for a robust Heritage Impact Assessment;
- g) Requirement for robust assessment of the potential impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;
- h) Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;
- i) Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;
- j) The development and associated infrastructure proposals will seek to deliver positive outcomes for the local community and surrounding environment;
- k) Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;
- l) Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;
- m) Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and
- n) Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.

Policy SCLP3.4 Supporting Text:

Major Energy Infrastructure

- 3.52 The Suffolk Coast is at the forefront of electricity energy generation across the country both in respect of onshore and offshore energy. It is essential that major energy infrastructure projects are delivered in a planned way which takes into account the potential impact of constructing, operating and decommissioning large and nationally significant infrastructure in East Suffolk. The Council is committed to working in a collaborative partnership approach with the scheme promoters, local communities, Government, New Anglia Local Enterprise Partnership, service providers and public bodies to ensure the best outcomes of major energy infrastructure projects can be achieved.
- 3.53 The Government, through the Department for Business, Energy and Industrial Strategy is committed to the increased delivery of Nuclear Energy Provision across the country. A new nuclear power station at Sizewell is a nominated site in the National Policy Statement for Nuclear Power Generation EN6 as part of this national package. Nuclear Energy has been generated at Sizewell since the 1960's and the operation of the site will continue beyond the plan period as a result of the separate operations that take place such as the decommissioning programme at Sizewell A and the continued production at Sizewell B and at a new station.
- 3.54 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. 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. The Council would be a statutory consultee in this process. However it is considered that one of the biggest development and construction programmes faced by the Council and its communities in generations should be developed alongside the overall policy framework for East Suffolk to enable the impacts and benefits to be managed, including addressing the issues of cumulative impact and outcomes of other large scale projects.
- 3.55 The role of the Local Plan will be to consider the suitability of any specific proposal and the mitigation of local impacts (both positive and negative) on the communities across the plan area and to realise the economic benefits during the construction, operation and decommissioning stages. The current Sizewell site is a rural location in close proximity to the town of Leiston and other nearby settlements such as Aldringham cum Thorpe and Eastbridge. In addition the wider highway and rail network to this location is challenging. As well as the social impacts affecting the communities nearby, the environmental impacts of a site on the coast, within the Area of Outstanding Natural Beauty and close to protected landscapes such as Sizewell Marshes and Minsmere Nature Reserve, and the impact on the Suffolk Seascape will need to be assessed both during construction and beyond. Impacts on the historic environment should be avoided, and if not possible, minimised. Opportunities to co-locate infrastructure may reduce impacts, and there may be opportunities to enhance the setting of assets through restoration after construction, operation and decommissioning. Focus should be on prevention of impact on the natural and historic environments as opposed to compensation for the effect. Where a project involves multiple consents, developers will be expected to work collaboratively with authorities to prepare a project wide Habitats Regulations Assessment.

- Suffolk Coastal Local Plan | Adopted September 2020 | Suffolk Coastal Spatial Strategy
- 3.56 Although the provision of nuclear energy is currently prominent, the Suffolk Coast is increasingly coming under pressure to support developments associated with the off shore energy sector and linking this into the national grid, as well as inter-continental connections to enable the exchange of electricity with other countries. Investment in a variety of major energy infrastructure projects needs to be supported by infrastructure and facilities on shore and these sectors are expected to require land to enable activities over the plan period. Where new major energy projects are proposed, potential alternative sites, located outside of designated areas should be considered at an early stage. Where possible companies and developers will be encouraged to work collaboratively and share infrastructure and facilities that serve other requirements to reduce any potential impacts during the construction, operation and decommissioning stages of projects.
- 3.57 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 mitigation and enhancement measures may be required to ensure proposed Major Energy Infrastructure Projects are acceptable in planning terms. 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 for planning obligations and planning conditions set out in the National Planning Policy Framework.
- 3.58 The timing of the Major Energy Infrastructure Projects across East Suffolk is not yet confirmed and the planning, construction, operation and decommissioning of existing and future projects are likely to be beyond the Local Plan period but are required to have regard to the policies in the Local Plan. It is not possible to fully identify all the issues that may arise as a result of individual or cumulative projects for local communities and operators. As such, this will need to be kept under consideration alongside future reviews of the Local Plan.
- 3.59 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. Although Table 3.6 identifies a variety of issues that may not be relevant to every Major Energy infrastructure Project, it is intended to inform pre-application and early engagement discussions and provides an early view on potential constraints and opportunities across the plan area.

Table 3.6 – Themes that may be relevant to the consideration of energy infrastructure proposals during the construction, operation and decommissioning stages.

Theme	Issue – what do we need to consider as East Suffolk on these aspects?
Community	<ul style="list-style-type: none"> ■ Engagement with the local community on the provision of infrastructure ■ Housing ■ Community facilities ■ Health facilities
	<ul style="list-style-type: none"> ■ Police facilities ■ Legacy and local community benefits for hosting major significant energy developments
Economic Opportunities	<ul style="list-style-type: none"> ■ Economic strategies recognise importance of the Suffolk Energy Coast ■ Need to maximise the economic growth and balance these against economic and social impacts ■ Creation of jobs during the construction, operational and decommissioning stages of all projects ■ Realisation of local economic opportunities and benefits ■ Associated demands on local supply chain and sectors which support projects ■ Minimise adverse impacts and effects on the tourist economy in east Suffolk and maximise benefits where possible
Emergency Planning	<ul style="list-style-type: none"> ■ Requirement for a co-ordinated Emergency Plan to be established across all organisations
Environment	<ul style="list-style-type: none"> ■ Sites located within the Area of Outstanding Natural Beauty and Heritage Coast ■ Impact on designated and protected landscapes and habitats. Projects to be supported by Habitat Regulations Assessment ■ Physical form, scale and appearance of buildings within the landscape ■ Impact on built, historic and natural environment arising from development, operation and decommissioning of projects ■ Potential impact on designated heritage assets, non-designated heritage assets, archaeological assets, and their settings, in the areas within and surrounding Major Energy Infrastructure Projects ■ Risk of significant dust deposition and damage to vulnerable landscapes including Minsmere Nature Reserve ■ Impact on Suffolk Seascapes ■ Impact of light pollution to nocturnal species, on the AONB and the historic environment ■ Appropriate landscaping of sites after the decommissioning phases ■ Habitat loss and noise disturbance for species and noise disturbance regarding the historic environment ■ Effect of light and dust on nature conservation sites and the historic environment ■ Impact on tranquillity
Flood Risk Management and Coastal Change	<ul style="list-style-type: none"> ■ Potential sites for Major Energy Infrastructure Projects located on an active coast line ■ Coastal management, erosion, adaptation ■ Flood risk related to estuaries ■ Effect of climate change on the coastline and hydrological processes ■ Detrimental impact on the sea bed and coastal foreshore environment

Health	<ul style="list-style-type: none"> ■ Construction and transportation noise impact on local communities ■ Long term loss of tranquil areas ■ Loss of large areas of countryside used for leisure and tourism ■ Negative impact on air quality
Housing and Accommodation	<ul style="list-style-type: none"> ■ Provision of campus style accommodation for construction workers ■ Influx of construction workers into the area and overwhelming the accommodation opportunities for local people and people visiting the area
Training and Education Opportunities	<ul style="list-style-type: none"> ■ Availability of skills in the local area ■ Upskilling of the local workforce through appropriate training programmes and education ■ Investment in training opportunities for the local workforce
Transport Network	<ul style="list-style-type: none"> ■ Local roads are not well suited to carrying the number or type of vehicle movements that will be necessary to enable construction and operation of Major Energy Infrastructure Projects ■ Agreement of dedicated routes with local community participation ■ Need for park and ride facilities to be created ■ Inadequate provision of laybys on the road network across Suffolk ■ Cumulative impact of other associated growth across and outside of Suffolk ■ Utilisation of existing rail networks

Policy SCLP7.1: Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

- a) Any significant impacts on the highways network are mitigated;
- b) It is proportionate in scale to the existing transport network;
- c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;
- d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;
- e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
- f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
- h) The cumulative impact of new development will not create severe impacts on the existing transport network.

Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.

Opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.

Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for:

- i) New large scale employment sites;
- j) Residential development of 80 or more dwellings; and
- k) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or road network.

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed.

Policy SCLP7.1 Supporting Text:

7 Transport

- 7.1 The Suffolk Coastal Local Plan area has a mixture of urban and rural settlements with limited public transport opportunities in certain parts of the plan area which places a heavy reliance on the private motor car as a form of transport to conduct day-to-day business. Many local roads are single track and unsuitable for conventional public transport and the lack of alternatives increases the use of the private motor car across the plan area. For those residents and visitors close to a range of facilities a bicycle may offer an alternative or additional transport option but this is limited.
- 7.2 As a result of this, the Local Plan seeks to acknowledge that sustainable transport opportunities are limited and appropriate provision for vehicle parking is required alongside developments and to maintain the viability and vibrancy of the area's town centres, visitor locations and wider communities. The Local Plan outlines strategic ambitions in respect of transport and highways infrastructure in Chapters 2 and 3. Policies in this chapter relate to local and site specific transport issues.
- 7.3 The Council has prepared a parking strategy and policies as part of Civil Parking Enforcement to be introduced across the District in April 2020. The Parking Plan details the Council's approach to parking management and enforcement, and the Local Plan helps to deliver the objectives through appropriate parking provision and sustainable transport as part of new developments.

Sustainable Transport

- 7.4 Many areas do not have access to convenient public transport and many local roads are single track and unsuitable for conventional public transport such as buses. This is reflected by the level of household vehicle ownership in the plan area which amounts to 86% compared to a national average of 74% (Census, 2011). Furthermore, approximately 44% of people in the plan area use a car as their primary mode of travel to work compared to a national average of 37% (Census, 2011).
- 7.5 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:
- Transport infrastructure to encourage and support sustainable modes of transport
 - A Bus Quality Partnership
 - A Smarter Choices programme
 - Review of car parking and pricing strategies
 - Review of park and ride strategy
 - Junction improvements

Sustainable transport measures will therefore be expected to promote and deliver modal shift in a manner consistent with local strategies.

Transport | Suffolk Coastal Local Plan | Adopted September 2020

- 7.6 The Suffolk Local Transport Plan 2011-2031 sets out priorities to support the growth of businesses, reducing demand for car travel, making efficient use of transport networks and improving infrastructure. The County Council's Rights of Way Improvement Plan complements the Local Transport Plan by identifying changes that will secure an improved network, contributing to its four shared priorities of reducing congestion, accessibility, air quality and safety. In consideration of this, Policy SCLP7.1 encourages and facilitates the use of sustainable transport options where possible, and supports the efficient use of existing transport networks.
- 7.7 In designing and assessing development proposals, the Public Rights of Way Network should be considered as a means of encouraging physical activity, providing access to the natural environment, supporting tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.
- 7.8 Travel Plans are required by the National Planning Policy Framework for all new developments that create significant amounts of movement. The purpose of a Travel Plan is to set out measures to facilitate sustainable forms of travel and reduce the use of the private car. This will help to leave a lighter footprint on the environment by enhancing sustainability and will ultimately create better places to live - an action of the Government's 25 year Environment Plan. It is not necessarily the size of the development that triggers the need for such a plan but more the nature of the use.
- 7.9 The Council will work in partnership with Suffolk County Council as they draft new guidance for Travel Plans. When published the new guidance will be considered by the Council and adopted for use as a material planning consideration if appropriate.
- 7.10 Travel planning can offer good practice for meeting the requirements set out in this policy for maximising sustainable transport even on sites that do meet the thresholds for a full travel plan.

Policy SCLP7.2: Parking Proposals and Standards

The Council will work with partners to ensure that vehicle parking provision is protected and managed to support the economy and sustainable communities. The level of parking provision required will depend on the location, type and intensity of use. Proposals that minimise congestion, encourage sustainable transport modes and reduce conflict between road users across the plan area will be supported.

Proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include:

- a) The provision of safe, secure, and convenient off-street parking of an appropriate size and quantity including addressing the need for parking or secure storage for cars, cycles and motorcycles, and where relevant, coaches and lorries;
- b) Opportunities to reduce the recognised problem of anti-social parking or potential problems that may arise which impacts the quality of life or vitality of an area for residents and visitors;
- c) Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles; and
- d) The incorporation of sustainable drainage systems (SuDS), permeable surfacing materials and means of protecting water quality in drainage schemes should be ensured.

Where proposals involve public transport improvements or re-developments, the Council will encourage the provision of Park & Ride facilities, if appropriate.

Proposals will be expected to have regard to the parking standards contained in the Suffolk Guidance for Parking (including subsequent revisions), excluding the elements of the Guidance related to 'Residential Parking Design', unless other local planning considerations indicate otherwise. Proposals should also accord with both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy, or Neighbourhood Plans for the area where applicable.

Policy SCLP7.2 Supporting Text:

Vehicle Parking

- 7.11 The reliance on the car as a primary form of transport in the plan area necessitates the need for provision of adequate, reasonably priced car parking to maintain the viability and vibrancy of town and district centres, as well as resorts and other areas popular with tourists across the plan area.
- 7.12 Transport and logistics form a very significant part of the local economy. To support the specific needs of this sector, the Council will work with relevant organisations such as Highways England and Suffolk County Council to ensure that needs such as stopping places are provided. Vehicle parking is an important tool for visitor management particularly in relation to tourism across the plan area. The provision of off-street visitor parking, (including multi storey) particularly where it applies to tourism and town centres, will be supported in appropriate locations.
- 7.13 Some people, either self employed, or as a condition of their employment, are required to take their work vehicle (such as a van or recovery vehicle) home with them. Modern vehicles tend to be bigger than the size of residential garages and parking spaces which means that these are not always suitable or available for parking. Where possible, the Council will encourage larger residential garages and parking spaces in new and renovated residential development to help address this.
- 7.14 Many modern vehicles are being manufactured with the aim of decreasing carbon emissions. This has led to the increase of low-emission vehicles as a usable and reliable form of transport. Although the concept of low-emission vehicles has been promoted and embraced in urban areas (such as town centre locations, supermarkets or places of work), rural areas have not seen a similar level of uptake. Notwithstanding this, the National Planning Policy Framework promotes the facilitation of low-emission vehicles. Over the plan period, it is anticipated that technological advances could lead to a wider uptake of such vehicles and the Council will support and encourage the facilitation of low-emission vehicles and their ancillary infrastructure needs, such as:
- Passive electric charging (capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces).
 - Active electric charging (fully installed and ready-to-use charging points):
 - Rapid charging hubs (22-50kw charging power)
 - On-street electric charging (7kw charging power)
 - Off-street electric charging (3kw charging power)
- 7.15 The level of charging supplied should reflect the standards set out for electric vehicle charging in the 2019 Suffolk Guidance for Parking (or subsequent revisions). However, higher levels of charging power will be supported, if considered appropriate and desirable. Technological advances throughout the lifetime of the



plan may require a flexible approach to be taken when considering low-emission vehicles and charging points in developments.

Parking Proposals and Standards

- 6 The level of parking provision required can be influenced by the location of new development, accessibility to public transport, provision for cyclists and the availability of public and on-street parking. The Local Plan recognises that improvements to public transport can reduce the requirement for parking provision, and have a beneficial impact on 'anti-social' parking, particularly with respect to commuter vehicles. The Local Plan will therefore support all improvements in public transport and sustainable travel options that have a positive impact on existing problems of parking provision and congestion at key 'pinch points'.
- 7 When considering proposals for parking, in order to reduce potential for surface water flooding and for the protection of water quality, sustainable drainage systems should be implemented (SuDS) with permeable surface materials⁴⁸.
- 8 As local highways authority, Suffolk County Council published the current 'Suffolk Guidance for Parking' in 2019. The document provides details in respect of vehicle parking standards to be implemented across the county subject to local considerations. Residential standards in the County Council document are presented as minimums and the Local Plan will seek to ensure appropriate parking does not proliferate the parking issues faced by many communities. The visual impact of parking will be considered against relevant policies of this Local Plan including Policies SCLP10.4 and SCLP11.1. 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.



⁴⁸ Examples of such can be found in the CIRIA SuDS Manual which details examples of best practice in this regard.



Five Estuaries

Response to ExQ1 Appendix H:
Extracts from East Suffolk Council,
Waveney Local Plan 2019

Policy WLP8.21 – Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

- It is proportionate in scale to the existing transport network;
- It is located close to, and provides safe pedestrian and cycle access to services, facilities and public transport;
- It is well integrated into and enhances the existing cycle network including the safe design and layout of new routes and provision of covered, secure cycle parking;
- It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
- It will improve public transport in the rural areas of the District;
- It includes facilities for charging plug-in and other ultra-low emission vehicles; and
- The cumulative impact of new development will not create severe impacts on the transport network.

Developments should connect into the existing pedestrian and cycle network. Where possible, proposals are to include measures set out in the Waveney Cycle Strategy (2016 and subsequent updates) and demonstrate they have considered how the scheme will encourage people to walk and cycle to access services and facilities where practical.

Subject to design considerations under Policies WLP8.29, WLP8.30 and WLP8.31, new developments will be required to provide parking that meets the requirements set out in the Suffolk Guidance for Parking issued by Suffolk County Council (2014 and subsequent updates).

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds, Transport Statements will be required for residential developments between 50-80 dwellings. Transport Assessments and Travel Plans will be required for residential developments larger than 80 dwellings. Non-residential development will be considered on a case by case basis.

Policy WLP8.21 Supporting Text:

Sustainable Transport

- 8.110 In Waveney, the car is the most used method to travel to and from work. Cycling levels are above average for the county and walking is also popular. Bus and train use is below county and national averages.
- 8.111 The Suffolk Local Transport Plan 2011-2031 sets out a priority to support the growth of businesses, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure.
- 8.112 The Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) identified that a number of junctions within the District, particularly in south Lowestoft would be close to capacity by 2036 and would therefore increase congestion.
- 8.113 Active travel such as walking and cycling positively contributes to public health and reduces the reliance on private vehicles. To encourage people to walk and cycle for convenience and enjoyment it is important that routes are delivered so they are direct, well connected to key local destinations and easy to follow. The Suffolk Walking Strategy (2015) and the Waveney Cycle Strategy (2016) set out the value and benefit of these activities, how existing provision can be improved to encourage greater participation and making use of opportunities afforded by a quality public realm and public right of way network. Delivery of these strategies will be critical in mitigating the impacts of congestion.
- 8.114 The Public Rights of Way Network has an important role in delivering sustainable development. The network provides a means of encouraging physical activity, providing access to the natural environment, supporting tourism, reducing travel by vehicular modes, reducing carbon emissions and (where relevant) aiding recreational avoidance of sensitive sites.
- 8.115 Policy WLP8.21 sets out requirements which should help improve the use of sustainable transport options and reduce the risk of congestion. The policy sets out basic principles for encouraging sustainable modes of transport. It also requires developers to have regard to the Waveney Cycle Strategy and subsequent updates.

8.116 Parking provision in new developments can have an impact on the use of private cars and also the success of the development. Suffolk County Council has published parking provision guidance and Policy WLP8.21 requires this guidance to be taken into account. To support the use of low emission vehicles, electric vehicle charging points are to be provided in accordance with the standards set out in the Suffolk Guidance for Parking published by Suffolk County Council and subsequent updates. Due to the potential increase in the use of electric vehicles developers are encouraged to provide each house with on plot parking with at least one electrical charging point accessible from either the driveway or garage. For houses with communal parking, flats and other developments, developers are encouraged to provide ducting and electricity supply to each car parking space to enable the installation of a charging point in the future.

8.117 Large scale developments can have significant impacts on local transport networks. The National Planning Policy Framework states that for developments which are likely to generate significant new movements, Transport Assessments and Travel Plans or Transport Statements should be prepared. Transport Assessments and Statements assess the potential transport impacts of developments and identify mitigation measures to promote sustainable development. Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a less detailed evaluation to be used where this would be more proportionate to the potential impact of the

development. Travel Plans are long-term management strategies for encouraging sustainable transport and mitigating the traffic impacts of a development. Suffolk County Council as the Highway Authority can provide advice on the scope and content of Transport Statements, Assessments and Travel Plans. Given the potential impacts of traffic on European protected habitats, particularly the Broads Special Area for Conservation, Transport Assessments should evaluate the potential increase in traffic on streets within 400m of protected sites. Where vehicle movements are likely to significantly increase in these locations, further assessment on air quality and impact on habitats will be required to inform project level Habitat Regulations Assessments.