

Forest Heath and St Edmundsbury Joint Development Management Policies Preferred Options

Document January 2012

Public Participation Report

1 Introduction

1.1

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1 Introduction				
<i>1.1</i>				
19888	Comment	hope that Core Strategy WILL be adhered to in planning decisions esp re non coalescence of Haverhill with Calford Green	Noted	None
19877	Support	I think that the whole document has been carefully thought out, covers all necessary points and has been well produced. I ave some small comments on typographicl errors	Noted	None
<i>1.3</i>				
19889	Comment	hope flood risk is noted re bidwells proposals for Kiddy land in centre of Kedington	Noted	
<i>1.5</i>				
19980	Comment	Moulton Parish Council have considered your consultation document and have also considered the submissions of the five Villages Preservation Trust and the Suffolk Preservation Society. At the Council meeting on 27th February it was resolved that Moulton PC would endorse in full the submission by the Five Villages Preservation Trust.	Noted	None
19921	Comment	This representation relates to Policy 1	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20092	Comment	Thank you for the opportunity to comment on the Forest Heath/St Edmundsbury Joint Development Management Policies Preferred Options Document. The County Council has no comments to make on this consultation.	Noted	None
19982	Comment	This was considered by Mid Suffolk's Environment Policy Panel on 28 February 2012 and no objections were raised. Mid Suffolk will be producing a joint development management policies document with Babergh District Council and will liaise with neighbouring authorities in relation to cross-boundary issues and the "duty to cooperate".	Noted	None
20091	Comment	This representation relates to Policy 1	Noted	None
19920	Comment	Thank you for consulting the County Council on the above Joint Development Management Policies DPD. I can confirm that Norfolk Council does not have any issues to raise with regard to this DPD.	Noted	None
19978	Support	' I support 1.5. It provides for peer group dialogue and appraisal, and should avoid duplication of written materials. It also provides more than one route of access for the general public to obtain information, or ask for clarification.'	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.6</i> 19917	Comment	This promises to be a most useful document containing as it does often much needed guidance particularly to Parish Council Planning Committees. That said, I would like to see, in the introduction a full and precise definition of "the Local Planning Authority". You know what that means and I think I do but not everyone will.	Local Planning Authorities are defined in the glossary to the NPPF. It should not be necessary to repeat it in local documents.	none
<i>1.9</i> 19890	Support	In taking account of previous consultations I hope that planners will note representations made then about Calford Green, and also the inspector's written report about the sensitivity that should be exercised about Calford Green when deciding on the policy for NE Haverhill	Noted	None
<i>1.12</i> 19893	Support	In general I agree with 1.12. However 'amongst other material considerations' could include matters that might nullify the sentiments of 1.12	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.13</i> 19915	Comment	Thank you for your letter of 10 January and we note formal responses are required by Thursday 8 March 2012. Meantime, we have read the 89 page document and note that the NPPF is frequently referred to, as if it was on the statute book. The NPPF is currently only a draft and there have been strong representations for major changes from The National Trust, MPs and many organisations, including The Clare Society who emailed the Minister on 5 September 2011. If the NPPF in its final version differs significantly from the draft then are we correct in assuming that you will have to revise your above document and seek a fresh consultation period ?	The NPPF has now been published in its final form and any consequential amendments will be made to the document, which will be subject to further consultation.	None
<i>1.15</i> 20026	Comment	The county council welcomes the opportunity to comment on St Edmundsbury and Forest Heath's preferred policy options, and does so in support of the aims of the Transforming Suffolk Sustainable Community Strategy and the county council's service responsibilities, which include: <ul style="list-style-type: none"> - Highways and Transport - Social Care - Education - Archaeology - Biodiversity and Landscape - Minerals and Waste Development 	Noted	None

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19894	Comment	<p>This instruction was very confusing...and sent me round in circles.Details of how to comment should be simple to follow if the intention is to have the general public involved. Luckily the Forest Heath office was able to help</p> <p>'Details of how to comment in the letter accompanying the document were not easy to follow. Little account had been taken of those with poor (or no) computer skills, but who might wish to be part of the dialogue. Some of these people might have valuable contributions to make'</p>	Noted.	We will review process for next consultation

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
2 Context				
2.1				
19985	Comment	<p>Policy 1 - Creating Places- Development Principles and Local Distinctiveness</p> <p>We agree with the councils statement made in 3.1 that "Good design is important for all development types in all locations", however this policy fails to adequately reflect the needs for sustainable growth, development and design for and within rural communities and locations. We believe the thrust of this policy should be to "raising" the quality of life for communities and "enhancing" the intrinsic qualities of the countryside, rather than just "preserving" or "not affecting adversely"</p> <p>Our district should be striving to become a beacon for excellent design standards and as such developers should be required to build homes that comply with the BREEAM standards of development.</p> <p>Herringswell, Red Lodge and Tuddenham have and continue to have major problems associated with the removal of sewerage. This policy needs to include an additional point that requires all major development within the district to consult with Anglian Water to ensure that the available infrastructure is capable of accommodating any additional growth. We would suggest this requirement could be inserted in point (h) of the policy, under section v).</p>	This representation relates specifically to Plocy 1 and is addressed in that section.	None
20025	Comment	This representation relates specifically to Policy 1 and endorses the policy.	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
2.2				
19979	Comment	<p>GENERAL</p> <p>- The word "sustainable" is used frequently but, like the NPPF draft, there is no clear definition of what this means. It is a much overused word and can mean all things to all people - perhaps that is the intention - but surely for planning purposes it needs to be carefully defined.</p> <p>- The NPPF is mentioned many times and it gives the impression that the two Councils have adopted it even though it is a draft document and not on the statute book. We believe that the NPPF, as drafted, is seriously flawed - as do the National Trust and many other organisations - and therefore if the Government apply common sense to create a reasonable balance in the final version your current consultation document will require amendment.</p> <p>- In our view it is essential that - in Clare for instance - no sites are developed unless basic Infrastructure, such as sewers and drains, are up-graded to take the increased volume. An Infrastructure analysis should be an integral part of the planning application process. Nowhere in this document is this important issue spelt out.</p>	<p>The NPPF has now been adopted and the document will need to be fully assessed to ensure compliance. The comments with regard to infrastructure are noted and addressed in other documents. In the instance of Clare, this is the draft St Edmundsbury Rural Vision 2031 Document.</p>	<p>Fully assess draft document for compliance with the NPPF</p>
20027	Comment	<p>The county council supports the proposed policies, but we noted the document's treatment of the draft National Planning Policy Framework.</p>	<p>Noted</p>	<p>The draft document will be fully assessed for compliance with the NPPF</p>
2.3				
19925	Comment	<p>Please see attachment.</p> <p>This representation relates to the HRA and has no objection.</p>	<p>Noted</p>	<p>None</p>
2.5				
20094	Comment	<p>I. You have listed a number of International and European sites in section 2.5 of the Document, does this list contain all such sites within the Boroughs or are there still some others?</p>	<p>Some sites are mentioned later in the document, but they are not listed as they may be subject to change, or new sites identified.</p>	<p>None</p>

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2.6 19895	Comment	It states in the Dec 2010 core strategy that there will be no coalescence of Haverhill with surrounding settlements. I trust that this will still be the case	Noted	None
20016	Object	<p>The process failed during stage 1 of the Sustainability Appraisal:</p> <p>Core Strategy mentions negative CO2 emissions, however, it was not listed as a Key sustainability indicator to target and monitor during the implementation of the plan!</p> <p>Dispersion of jobs and fragmentation of population means housing and jobs will be required throughout the area. However, the core strategy limits development primarily to key service areas.</p> <p>The Core Strategy is flawed because increasing mobility leads to residents travelling in many directions simultaneously. The reliance on and weight given to importance of provision of "sustainable transport modes" is non-sense.</p>	This objection appears to relate to criticism of the Core Strategy, not the development Management document.	none

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3 Sustainable Growth, Development and Design Principles				
3.1				
20038	Comment	Please see attachment. The representation relates to chapter 3,4,5,7,8,9 and 10, there are also general comments.	Noted - see individual responses.	None
3.3				
19965	Comment	Subjective. Include reference to Conservation areas and listed buildings?	Although Conservation Areas are referred to in the policy, specific guidance and policies relating to Conservation Areas is considered in detail at Chapter 4.	None
19987	Comment	Add 'its listed buildings and conservation areas' after 'respecting' line 1	Although Conservation Areas are referred to in the policy, specific guidance and policies relating to Conservation Areas and Listed Buildings is considered in detail at Chapter 4.	None
19966	Comment	Include a reference to "scale" as intrusive features in the landscape may conflict with the aim of conserving and enhancing the natural environment.	Paragraph 3.3 relates to the built environment. Matters relating to landscape and natural environment are addressed in Chapter 4.	None
19896	Comment	Calford Green has local character and distinctiveness . That this is acknowledged by many with no direct link to the hamlet was obvious at the 2010 Hearing and I hope development proposals will be mindful of that; and of the written sentiment expressed by Inspect Mike Moore	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 1 - Creating Places - Development Principles and Local Distinctiveness</i>				
19886	Comment	The preamble to this policy notes the importance of "good design" (paras. 3.1 and 3.2). Regrettably, in Bury St Edmunds there are prominent examples where this has been severely lacking. Two examples are the grey, windswept and cheerless Arc shopping development and quite recently the hideous orange hulk that has been erected behind the old Borough Offices on Angel Hill. The latter development ruins the skyline of the attractive old building with a confused mish-mash of design and seriously degrades the streetscape as viewed from Mustow Street. St Edmundsbury Council needs to take more cognisance of its declared policies.	This representation appears to be a criticism of interpretation of previous policies, rather than a comment in respect of the policy proposed.	none
20087	Comment	<p>This policy fails to adequately reflect the needs for sustainable growth, development and design for and within rural communities and locations.</p> <p>We believe the thrust of this policy should be to "raising" the quality of life for communities and "enhancing" the intrinsic qualities of the countryside, rather than just "preserving" or "not affecting adversely"</p> <p>The district should be striving to become a beacon for excellent design standards and as such developers should be required to build homes that comply with the BREEAM standards of development.</p> <p>As Lakenheath has major problems associated with the removal of sewerage, the policy needs to include an additional point that requires all major development within the district to consult with Anglian Water to ensure that the available infrastructure is capable of accommodating any additional growth.</p>	The sentiments of this representation are acknowledged and shared. The policy is intended to achieve high quality design, but should not be seen in isolation. Policies 6 and 22, for example seek to raise standards of construction and design.	None

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19972	Comment	<p>These comments are submitted by the 107 residents of the Home Farm Lane [South]/Hardwick Park Gardens Residents Group. More detail is contained in a document/petition delivered to St. Edmundsbury Council.</p> <p>Existing Policy DS3-f)i) of the Local Plan 2016 and item 3f)i) of the Supplementary Planning Document dated September 2011 recognised that building amongst/near existing houses required special consideration to control unsuitable development, density, scale etc. and this should therefore be replicated in Policy 1 as a new clause. Alternatively, the words "scale, density, massing, height and materials" should be inserted into clause a). We support the rest of Policy 1.</p>	<p>Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.</p>	<p>Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.</p>
20146	Comment	<p>The general design policy (Policy 1), seeking to protect residential amenity from new development, should also recognise that all proposals for new residential development should be considered relative to any existing employment uses within the vicinity, and the impact these would have on the residential amenity of future occupants of the proposed residential use. If such effects would arise, this should dictate against the location of sensitive receptors (such as residential uses) next to or within the vicinity of established nationally significant and long term employment uses.</p> <p>Policy 1 also requires that all development proposals should not adversely affect important landscape characteristics and prominent topographical features, and sites, habitats, species and features of ecological interest. This is in addition to a more detailed policy on development on sites of biodiversity and geodiversity importance (Policy 10) and landscape features (Policy 13). Given that the "settlement pond/soil storage/soakaway" areas of the British Sugar site form an integral and important part of the operation of the factory (as per our comments above), we would object to these policies as they are currently drafted, and would request that "where appropriate" or "where there is a proven need," is inserted into the policy text, where the policy requires tests or supporting information for all development relative to landscape/biodiversity matters.</p>	<p>Agreed. As currently worded the policy does not take account of existing activities which could give rise to problems if subject to new sensitive development in close proximity.</p>	<p>Insert additional sub-category after h) which reads: "i) not site sensitive development where its users would be adversely affected by noise, smell vibration or other forms of pollution from existing sources unless adequate mitigation works can be implemented;"</p> <p>Re-number following sub-categories accordingly.</p>

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19922	Comment	Please see attachment. This representation relates to policy 1	Please see comments and changes recommended in response to separate detailed submission.	
20102	Comment	Policy 1 Creating Places - Development Principles and Local Distinctiveness Legally compliant: Yes Sound: No Why unsound: Not justified Policy 1 (d) indicates that development proposals should produce a landscape/townscape character appraisal prior to or as part of any Concept Statement and/or masterplan. Clarification is however required as to who will produce Concept Statements. We appreciate that some development proposals may have an impact on the landscape and townscape character and that the local authorities may want information about the nature of those impacts to be submitted with a planning application. It is however unjustified to require potential applicants to produce such appraisals as part of any Concept Statement if these Concept Statements will be produced by the local authorities. Proposed Changes Clarification is required in Policy 1(d) as to who will produce Concept Statements.	Agree. Clarification should be provided in paragraph 3.5	Amend paragraph 3.5 to provide the necessary clarification.
19988	Comment	These comments are submitted by the 107 residents of the Home Farm Lane [South]/Hardwick Park Gardens Residents Group. More detail is contained in a document/petition delivered to St. Edmundsbury Council. Existing Policy DS3-f)j) of the Local Plan 2016 and item 3f)i) of the Supplementary Planning Document dated September 2011 recognised that building amongst/near existing houses required special consideration to control unsuitable development, density, scale etc. and this should therefore be replicated in Policy 1 as a new clause. Alternatively, the words "scale, density, massing, height and materials" should be inserted into clause a). We support the rest of Policy 1.	Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.	Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.

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20109	Comment	<p>It is anticipated that the NPPF will continue to include the "presumption in favour of sustainable development".</p> <p>Policy 1 of the document should therefore clearly set out how this requirement will be translated by the Councils and provide clear guidance on what would constitute sustainable development and how development proposals will be assessed against the requirement.</p> <p>Some of the elements of Policy 1 may well be considered as facets of "sustainable development". Until the NPPF is published it is not possible to fully appreciate how this will impact on locally derived development policy approaches. We consider that Policy 1 will need a significant redraft in the light of the NPPF.</p> <p>Elements of Policy 1 appear to be more general development objectives than planning/spatial policy. Such general objectives should be separate, leaving Policy 1 as the tool to determine what constitutes sustainable development.</p>	<p>The NPPF clearly identifies "sustainable development" as performing an economic, a social and an environmental role. These are mutually dependant and should not be undertaken in isolation. Policy 1 fully accords with the core planning principles outlined in paragraph 17 of the NPPF.</p>	None
20056	Comment	<p>The county council supports the reference to public health as a design consideration, but we would like to explore ways in which this policy, or another, can be used to deliver increased provision of sprinkler systems in all development.</p>	Noted	None
20122	Comment	See representation 20082	See representation 20082	See representation 20082

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20114	Comment	<p>The policy includes a requirement that a landscape/townscape character appraisal be prepared prior to or as part of any concept statement and/or masterplan.</p> <p>We would highlight that the existing character of the landscape and townscape is just one of a number of issues to be considered during the preparation of a Masterplan. It is unclear why this is the subject of a separate criterion within Policy 1 as it is a matter to be considered in relation to Policy 2. In short the policy test for a Masterplan is whether there is a distinctive landscape or townscape character and how this can be reflected in the Masterplan, be it inclusion of key on-site features of a combination of this and a set of design principles to be taken forward at the appropriate time.</p>	<p>Although it would appear that this criterion may be more appropriately located within Policy 2, the policy serves to inform Policy 2. Policy 1 is concerned with local distinctiveness and is the appropriate place for considering the broad character appraisal. The policy does not require the appraisal prior to a masterplan, but it does facilitate the preparation of such in advance.</p>	None
20148	Comment	See representation 20100	See representation 20100	See representation 20100

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20100	Comment	<p>This lays out the development principles for all new development. Flexibility is a key criteria of soundness both in PPS12 and in the NPPF and it is considered that Inspectors now seek to ensure that flexibility is appropriately incorporated into Development Management Policies. It should be made clear that not all of the requirements stated can apply to all development proposals. There also needs to be a recognition that not all sites have the ability to meet all the requirements e.g. the ability to intergrate cycle and pedestrian routes can often be dependent on neighbouring landownership that is not controlled. With the NPPF seeking to reduce the amount of planning regulation care must be taken to ensure that policies which seek to operate under the NPPF do not simply put back layers of regulation.</p> <p>Development Management requires the balancing of varying sometimes conflicting objectives. Policies such as number 1 can create confusion and uncertainty by seeking to cover ever eventuality. For example (b) requires that "all development should as appropriate maintain or create a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded." This is not sufficiently precise or appropriate for the majority of development projects. Another example is (i) "produce designs and layouts which are safe and take account of crime prevention, community safety and public health." It is not clear how a layout can take account of "public health." This is a policy which is not sufficiently clear, lacks necessary flexibility and will be in danger of being open to wide interpretation.</p> <p>The policy refers to sustainable design and construction measures and energy efficiency matters which in turn are covered in more detail in Policies 6 & 7. It is considered that such policies are better and more appropriately catered for within Building Regulations. This has been recognised in other planning authorities Development Management Policies and by Planning Inspectors. Placing requirements of this nature in a planning document is considered to be unnecessary duplication.</p>	<p>Policy 1 applies to all forms of development and has, therefore, to incorporate a high degree of flexibility. It is acknowledged that not all of the criteria will apply to all applications.</p> <p>Certain elements of a proposal may be subject to more detailed analysis under different policies, elsewhere in the document. For example, the reference to designs which take account of public health may be addressed through the masterplan/development brief process, or through the building for life standard.</p> <p>Although more appropriately addressed in detail elsewhere, sustainable design and construction measures and energy efficiency matters cannot be catered for by Building Regulations alone, when fundamental design and layout issues can have a significant impact. This accords with the advice contained within paragraphs 95, 96 and 97 of the NPPF.</p>	None

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		<p>Reference should clearly be made in the preamble to this policy that planning decisions are often a judgement made from assessing the pros and cons of any proposal and arriving at a balanced view. In this way it would be clear that not every aspect of the policy has to be achieved before support for a proposal is forthcoming.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20082	Comment	<p>Principle d) requires a 'landscape/townscape character appraisal' to be prepared 'prior to or as part of any concept statement and / or master plan'. It is questioned why one of these will be required for all development proposals.</p> <p>As currently worded, Principle e) suggests that development will not be permitted which 'involve the loss of open, green or landscaped areas which make a significant contribution to the character and appearance of a settlement'. This would appear to go beyond national policy and also supersedes existing local policies and designations. It suggests that provided it can be demonstrated that an area of land makes a significant contribution to the character and appearance of a settlement then development will not be permitted. It is therefore questioned what quantifies as "significant". It is also questioned what would happen if an area of greenfield land was not related to a settlement. Overall, it is considered that Local Authorities should continue to use appropriate landscape designations that are made in Development Plan Documents, such as 'Visually Important Open Spaces'.</p> <p>The design standards and principles are generally supported, and it is agreed these will be worked up during the planning process. However, the inclusion of "appropriate refuse and recycling facilities, compost bins, water butts and litter and dog waste bins" as set out in principle l) is considered to go too far. The level of detail required in this principle is therefore objected to.</p> <p>Overall, the initial wording of Policy 1 leads to confusion: "Proposals for all development, should, as appropriate: ..." This does not offer the reader precise or definitive guidance, and ultimately suggests that it will be down to the Local Authority to determine exactly what is necessary on an individual application basis. If that is the case, it would be better to add wording at the start of this policy to the effect that the definitive principles required for each individual development will be agreed during pre-application discussions.</p>	<p>Criterion d) relates specifically to the masterplan/concept plan process and not all development proposals as implied.</p> <p>Criterion e) does not go beyond national policy, but fully accords with the aims of the NPPF, particularly paragraphs 58 and 77. Existing local policies set out to define these areas. However, by specifically identifying areas in advance, there is little opportunity to respond to changing circumstances.</p> <p>Criterion l) includes the word 'appropriate'. This level of detail will not be appropriate in all cases, but there are instances, particularly on larger developments, where failure to take account of these issues will result in a poor environment.</p> <p>It is not agreed that the use of the phrase "Proposals for all development, should, as appropriate:..." leads to confusion. It is not beyond the scope of any applicant to identify what they consider to be appropriate, using the criteria which follow.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20162	Comment	See representation 20102	See representation 20102	See representation 20102
20134	Comment	See representation 20087	See representation 20087	See representation 20087
20005	Object	<p>The policy includes a number of elements which are repetitive of national policy or legal requirements. For example, criterion c) relates to a statutory duty, although does not actually accurately reflect that statutory duty. Requirements such as f) and g) are covered by other policies of the plan and can simply be deleted.</p> <p>The policy is not consistent with National Policy as set out at para. 4.32 of PPS12.</p>	<p>It is acknowledged that the policy incorporates elements which are considered in greater detail elsewhere in the plan, but the context of Policy 1 is to bring those elements together in the consideration of place making. The specific reference to Conservation Areas goes beyond the statutory duty and adds value.</p> <p>Paragraph 4.32 of PPS12 is not carried forward into the NPPF.</p>	None
20060	Object	<p>This is a far too loose a brief /definition and dramatically dilutes down what any key features may be or "are and omits important "Key.No mention of referring in determining whether greenfield urban extensions should be developed.The is no mention of the "naming" of the Development & Design principles. This is a massive "omission". Each development should have a precise "public identifiable name from day one of inception.Simply not North east of Bury st Eds.If a development "moves" such as Compiagne Way Development towards another area.It should be identified as changed.</p>	<p>The objection is noted, but the local Planning Authority has no authority to require a particular name for a development.</p>	None
19904	Object	<p>The existing St. Edmundsbury Local Plan included controls over the density, scale height, massing etc of development but this is missing from the new Policy 1. These requirements are important where development is proposed near to existing homes and therefore should be inserted in Policy 1. I give my comments on the basis that the rest of Policy 1, which I approve, remains unaltered.</p>	<p>Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.</p>	<p>Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.</p>

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19875	Object	<p>These comments are submitted by the 107 residents of the Home Farm Lane [South]/Hardwick Park Gardens Residents Group. More detail is contained in a document/petition delivered to St. Edmundsbury Council.</p> <p>Existing Policy DS3-f)i) of the Local Plan 2016 and item 3f)i) of the Supplementary Planning Document dated September 2011 recognised that building amongst/near existing houses required special consideration to control unsuitable development, density, scale etc. and this should therefore be replicated in Policy 1 as a new clause. Alternatively, the words "scale, density, massing, height and materials" should be inserted into clause a). We support the rest of Policy 1.</p>	Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.	Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.
19903	Object	<p>Policy 1 should state that development should incorporate designs of a scale, density, massing, height and material compatible with the locality. This requirement should be inserted as a separate item in Policy 1 or included in the text of Policy 1a). The word "density" is particularly important as it will control development amongst existing dwellings. I approve of the remaining parts of Policy 1.</p>	Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.	Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.
19939	Object	<p>As the ward member for Southgate in St Eds I have been contacted by a group of 107 residents from the Home Farm Lane and Hardwick Park Residents Association who would like to see the following statement (broadly taken from Policy 24) inserted as h) vii) "the character, scale, density and design of existing dwellings and the character and appearance of the immediate and surrounding area". I fully support this suggested amendment and would like to see it included to offer extra protection to residents against unsympathetic development.</p>	Agree with the principle of the objection, but revised wording should take account of all forms of built environment, not just residential.	Add further paragraph i) - "produce designs that respect the character, scale, density and massing of the locality". Following paragraphs to be re-numbered accordingly.
19897	Support	<p>Strongly support vis a vis NE Haverhill Plan, the place of Calford Green, and the needs of Kedington village. Particularly important clauses: a, e, h(i) (iii)(v)</p>	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.4				
19844 19849 19854 19860	Object	Masterplans prepared in advance of an outline planning application act as barriers to delivery. The masterplan in the case of 2.5 ha at Crown Lane, Ixworth allocated in 2006 has taken four years to achieve. The requirement for the LPA to produce and consult on a Concept Statement, which promised to deliver landscaping and open space on land beyond the control of the developer and then to consult on a Masterplan which excludes these elements has put back the development and created a feel on animosity between local residents and the LPA.	This process need not result in undue delay, but should be seen as part of the pre-application engagement and front loading advocated in the NPPF. The process should look beyond the confines of a particular site, or the initial development period, which may include aspirations which cannot be immediately delivered, but will guide any subsequent development. In respect of the case referred to, work commenced on the Concept Statement in 2008 and the final masterplan was adopted in 2010. A planning application has yet to be submitted	None
3.5				
19898	Comment	Clause a) d) and s) most important for whole NE Haverhill area Clause e) major consideration for Bidwell's proposal (Kiddy land) for centre of Kedington.	Noted	None
19845 19850 19853 19859	Object	Concept Statements prepared by the LPA are often funded by the developer due to resource and timing issues, which is unacceptable. In our experience, little or no account is paid to the developer's comments during the preparation or the public consultation period. The Crown Lane, Ixworth, Concept Statement identified off-site works, which were promised to the local Parish Council which were ultimately undeliverable. The Concept Statement has only resulted in alienating the community which is extremely unhelpful. Concept Statements if retained must actively engage with and listen to the developer to assess what is deliverable.	The purpose of the Concept Statement is to engage with all those who will be affected by/ benefit from development at a pre-application stage. This includes the developer/landowner, statutory undertakers and local communities. All have a role to play in informing the process. Paragraph 3.5 and Policy 2 do not require funding from a landowner or developer, but at a time when public resources are limited, it is not unreasonable to seek funding from those who will benefit most from the process.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 2 - Masterplans</i>				
20187	Comment	<p>Masterplans should only be required where they are genuinely needed to help secure a co-ordinated and balanced approach to the delivery of development. Paragraph 2 of Policy 2 is onerous. It appears to go beyond established planning policy in that it does not appear to allow for a consideration of other material considerations that may outweigh certain aspects of Policy 1's criteria (see other comments on Policy 1). The requirement for Masterplans to follow LPA approved documents also has the potential to delay development. Development proposals cannot be held back because the Council has not had the time or resources to prepare and adopt design guidance, concept statements or other Supplementary Planning Documents (SPDs) for each qualifying allocated site. This is a potential throttle on growth and likely to be contrary to forthcoming national policy. Also some of the specified requirements for the matters to be included in Masterplans may be difficult to fulfill on planning applications that are brought forward in outline, rather than detail. These representations on Policy 2 should also be read in conjunction with the Bidwells (Mr Michael Hendry) representations also submitted on behalf of Persimmon Homes Ltd.</p>	<p>There is nothing in paragraph 2 of the policy which suggests that other material considerations would not be considered that may outweigh certain aspects of Policy 1. Policy has an inbuilt flexibility through the wording 'as appropriate'. Although prepared by LPA's when required, landowners/developers are encouraged to participate in the process and may provide additional resources to ensure swift delivery. The policy is fully compliant with the NPPF, particularly in respect of pre-application engagement and front loading. The existence of an adopted masterplan should facilitate outline applications rather than hinder them, as much of the information required with an application will already have been provided and outstanding issues can be addressed at the detailed stage.</p>	None
20088	Comment	we support the reference to biodiversity in Policy 2, criterion (d).	Noted	None
20140	Comment	Support - Policy 2 - We support the reference to biodiversity in policy 2, criterion (d).	Noted	None
20115	Comment	<p>Natural England also supports the provisions set out in Policy 2 (Masterplans), specifically points c, d, e, l, m, o, p and s. However, we also recommend that GI is included in point c as follows: 'major landscaping, green infrastructure and open space proposals to assimilate new development into the landscape, provide sufficient recreational greenspace and create new habitats.'</p>	Agreed	'major landscaping, green infrastructure and open space proposals to assimilate new development into the landscape, provide sufficient recreational greenspace and create new habitats.'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20029	Comment	The county council would appreciate specific reference being made to 'blue corridors', areas designated for the channelling of overland flows of water away from property and key infrastructure, under section e).	This suggestion would provide positive guidance.	Insert ', including details of blue corridors (areas designated for the channelling of overland flows of water away from property and key infrastructure)' after 'infrastructure and services'.
20024	Comment	Criterion f) should clarify that retail development outside of existing centres will only be permitted where they are of an appropriate size and scale to meet the local needs arising from the development. A retail impact assessment should be required to assess the impact of any proposals on existing centres in accordance with national policy PPS4 (Policies EC14 and EC16) and draft NPPF.	Protection of town centre viability and vitality is already exists within the Core Strategies. It is not necessary to repeat it.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20149	Comment	<p>The preamble to this policy refers to Concept Statements, seemingly where appropriate as an integral part of the planning process, yet there is no policy covering the production of such statements. There should be a clear indication as to what scale of development warrants the production of a Masterplan rather than it being at the discretion of the Council. This would help provide greater certainty when development proposals are being considered.</p> <p>a) Clarification is sought as to the need for Masterplans to consider "any growth proposed beyond the plan period." Guidance is needed as to what would have to be addressed by such a requirement.</p> <p>g) It is acknowledged that the policy states "where appropriate" but the suggestion that public art is a prerequisite of any successful scheme and therefore needs to be included in a Masterplan should be deleted. The creation of an acceptable public realm or community base should be the objective of a scheme and this should be able to be achieved without the need for it to be adorned by pieces of art. Public art may only be appropriate in certain circumstances and this needs to be made clear. It is too often the case where public art is used to either prop up or distract from the design deficiencies of a scheme.</p> <p>h) It cannot always be assured that affordable housing will be provided "in line with adopted policy". As such this reference needs to be revised or deleted accordingly. In many cases the Masterplan must contain flexibility and the requirements for affordable housing are likely to change over the course of a development, particularly major schemes.</p> <p>m) It should be made clear that developer funding would be required to only mitigate the impact of the proposed development.</p> <p>p) It is acknowledged that the policy states "where appropriate" but securing on-site renewable, decentralised or low carbon energy generation may not be the most appropriate solution for the site. There needs to be the opportunity to look beyond site specifics to optimise how this issue is addressed. In regard to on-site provision there may be alternative green solutions that can be incorporated into a scheme - these also need to be acknowledged.</p> <p>r) The same comments apply, as above, in relation to</p>	<p>As Concept Statements are prepared by the Local Planning Authority, a separate policy would serve no beneficial purpose.</p> <p>The policy clearly states that the need for a masterplan will be identified by Area Action Plans and Sites Allocation DPD. However, there remains a need for flexibility to take account of unforeseen circumstances such as the unexpected release of a large brownfield site.</p> <p>There have been instances in the past and they may occur in the future, where a site clearly has the ability to provide for growth beyond the plan period. In such circumstances, this should be recognised and identified as such.</p> <p>The respondent acknowledges that public art may be appropriate in certain circumstances. This is the purpose of identifying it at the masterplan level. This should also serve to avoid art being used as a distraction.</p> <p>It is entirely appropriate that the policy should require affordable housing in line with adopted policy. The affordable housing policy in the Core Strategies incorporates the necessary flexibility to take account of changing circumstances. Developer funding will need to accord with CIL regulations.</p> <p>The policy is seeking a variety of measures relating to energy demand, efficiency and generation, which would include alternative green solutions.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		references re beyond the plan period and in regard to funding matters.		
20089	Comment	<p>Client's site (British Sugar) is currently designated in adopted Local Plan as requiring a masterplan and it is understood this will be carried forward into the emerging Vision 2031 document.</p> <p>Primary planning use of the whole site is industrial and is of national and significant local importance. This should be reflected in emerging policies. The need for a masterplan is not understood and should be removed.</p> <p>Will be submitting representations relative to the emerging policies in the Vision 2031 document and reserve the right to make representations on Policy 2 subject to the removal, or otherwise, of our clients site from the masterplanning approach.</p> <p>In the meantime, note that paragraph 3.4 confirms that masterplans will be prepared by the developer. we object that the wording does not explicitly state that other key stakeholders should be consulted.</p>	<p>This response relates primarily to the principle of a site being identified by other documents as requiring a masterplan approach, rather than to the principle or drafting of the policy.</p> <p>The objection is respect of the lack of information relating to consultation is addressed elsewhere in respect of this policy.</p>	None
20107	Comment	<p>We recommend that this policy refers to protection of the historic environment interest of sites in the context of masterplanning, through an additional category following part d) covering nature conservation. This would ensure that any heritage constraints or opportunities are recognised and designed into the development from an early stage. PPS5 advises in para7 that consideration of the historic environment is integrated into policies promoting place shaping. English Heritage's guidance documents 'Understanding Place' provide some information on how analysis of the historic environment might be approached to inform new development.</p>	<p>In practice consideration of the historic environment is always required, although it is acknowledged that it appears to be an omission from the policy. The inclusion of a new category to reflect this requirement would strengthen the policy.</p>	<p>Insert new category following d) to refer to protection of the historic environment.</p>
20144	Comment	See representation 20089	See representation 20089	See representation 20089
20064	Comment	<p>What would the definition of medium to long term be, in a time line scale and its provided service during the period is irrespective of demand & its continued sustainability to continue eg Profitable for operator. Not Born to Fail.</p>	<p>Except where determined by a Core Strategy, it is for each masterplan to identify relevant timelines.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20180	Comment	<p>Policy 2 Masterplans</p> <p>We recommend that this policy refers to protection of the historic environment interest of sites in the context of masterplanning, through an additional category following part d) covering nature conservation. This would ensure that any heritage constraints or opportunities are recognised and designed into the development from an early stage. PPS5 advises in para 7 that consideration of the historic environment is integrated into planning policies promoting place-shaping. English Heritage's guidance documents 'Understanding Place' provide some information on how analysis of the historic environment might be approached to inform new development. These are available on the Historic Environment Local Management (HELM) website.¹</p>	<p>It is acknowledged that the protection of the historic environment should form part of the masterplanning process. However, the second paragraph of the policy refers to the requirement for proposals to accord with Policy 1. Policy 1 contains the specific safeguards in criteria d) and h).</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20123	Comment	<p>3.0 Masterplans (Policy 2) (p. 13-15)</p> <p>3.1 The principles of Masterplans are fully supported. They are seen as helpful and beneficial tools in the planning process that can help with engagement and management of expectations.</p> <p>3.2 The idea of 'Concept Statements' is not fully explained or understood. It is insinuated that these Concept Statements will be prepared by the Local Authority, and Masterplans and Development Briefs will then need to be prepared in accordance with any Concept Statement. However, it is unclear if developers would be required to prepare a Concept Statement. Either way, it would be helpful if greater clarity could be provided.</p> <p>3.3 Some of the specifications set out for the preparation of a Masterplan are particularly detailed. For example, point d) requires a comprehensive biodiversity plan with various protection and mitigation measures for the whole site; while point e) requires design principles and measures to minimise climate change risks. This is considered to be far too detailed for a Masterplan approach. If this level of detail were to be required in a Masterplan then assurances must be written in that this information will not be required with a subsequent planning application. The Masterplan must be accepted as part of an application, or else there is the possibility of duplication of material and waste of resources which is simply unacceptable in the current economic circumstances.</p> <p>3.4 The provision of public art within a Masterplan is also questioned, as set out in point g). It is questioned whether such a formal requirement can be justified for inclusion within a Masterplan, and what sort of criteria, including size and price, would be applied. There is a specific Public Realm Improvements policy (Policy 35), and is considered that public art is better to be considered in that context, rather than also be a requirement of a Masterplan as well.</p> <p>3.5 The requirement for a Travel Plan to accompany a Masterplan, as set out in point m), is also questioned.</p>	<p>The role of the concept statement is explained in paragraph 3.5, although it is acknowledged that it does not make it clear that they are prepared by the LPA.</p> <p>The level of information required will vary from site to site and the policy is quite clear that the information will be required "where appropriate". Where an issue is adequately addressed in a masterplan, it should not be necessary to repeat it in a planning application.</p> <p>The provision of public art within new development is not considered inappropriate and again is qualified for the overarching statement 'where appropriate'. This would not necessarily be achieved through Policy 35 alone.</p> <p>The broad principles established by a travel plan can be entirely appropriate at a masterplan stage. Both authorities operate a three bin disposal system and this needs to be facilitated at an early stage in terms of design and access to avoid later problems of clutter and collection difficulties. Similarly, water collection/recycling needs to be identified and accommodated at an early stage.</p>	<p>Amend paragraph 3.5 to read "A Concept Statement is the high-level vision prepared by the Local Planning Authority of the place that a new development should create."</p>

<i>Representations</i>	<i>Nature Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>The specific developer funding and timetable for delivery/funding/implementation is considered to be too detailed for a Masterplan. For example, the requirement for a Masterplan to ensure revenue funding is secured to enable bus services to run from the first occupation of the site is considered unrealistic and too onerous for this stage in a planning process. There is a specific policy requiring Transport Assessments and Travel Plans (Policy 43), so this would appear to be a repetitive policy requirement and should be removed as a Masterplan requirement.</p> <p>3.6 It is unclear how the Local Authorities wish the domestic waste disposal, storage and collection set out in point o) to be incorporated into a Masterplan. This also leads into the need for a waste management plan (point q) to also be incorporated into a Masterplan.</p> <p>3.7 The Local Authorities are setting out considerably more requirements than are normally associated with Masterplans.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20163	Comment	<p>Policy 2 Masterplans Legally compliant: Yes Sound: No Why unsound: Not justified, effective, consistent with national policy We recognise that local authorities wish to understand how development sites will be planned and delivered. The current validation process requires applicants to submit an appropriate level of information to assist the decision making process and can cover the information requirements set out in Policy 2. The appropriate information is either included in the Design and Access Statement accompanying planning applications, other technical assessments, or forms part of an environmental impact assessment as necessary. Given the adopted Core Strategy policies, other policies contained in the Development Management Policies DPD, particularly Policy 1 and current validation requirements there is no justification for potential applicants to also produce a masterplan. The introduction of a requirement to specifically produce a masterplan for development proposals would add a further unnecessary stage in the planning process, adding delay, cost and could undermine the timely delivery of new development. Our concerns that this policy could delay new development are underlined by the requirement for masterplans to be based on upon a Concept Statement, or content of an Area Action Plan prepared by the local authorities. The preparation of these documents will therefore be dependent on the availability of local authority resources. There is no certainty for potential applicants that this approach will facilitate the timely delivery of development contrary to PPS1 (paragraph 9). We are also concerned about the high level of detail required by this policy for inclusion in any masterplan. Masterplans should set out principles and parameters for guiding future development phases and be flexible enough to respond to changing circumstances over time. The high level of detail required such as a Travel Plan, a comprehensive biodiversity plan, litter and dog waste bins and funding arrangements for public transport and other infrastructure is too prescriptive and could undermine the flexibility of the masterplan and add</p>	<p>The masterplan process has been in existence within the Borough of St Edmundsbury for a number of years and has been the subject of an RTPI award. It is fully compliant with the NPPF, particularly in respect of pre-application engagement and front loading. It is acknowledged that concept statements will be required where there is no Area Action Plan. Although prepared by LPA's when required, landowners/developers are encouraged to participate in the process and may provide additional resources to ensure swift delivery. The level of information required will vary from site to site and the policy is quite clear that the information will be required "where appropriate". The requirement for separate development briefs in criterion b) is only likely to occur on large phased schemes which may not contain sufficient detail at the local level.</p>	None

<i>Representations</i>	<i>Nature Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>unnecessary cost and delay to the development process. Such matters are more appropriately considered as part of a planning application. The approach in Policy 2 is contrary to PPS12 (paragraph 5.2) that seeks to ensure that DPD's are flexible and PPS1 (paragraph 38) that advises design policies should avoid unnecessary prescription or detail, concentrating on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally.</p> <p>Policy 2, as drafted, requires details of developer funding and a timetable for its implementation for public transport and other social and physical infrastructure. These details are likely to evolve Eclipse Planning Services 3 1011/FHDCMPPPO reps/fv March 2012 through negotiation with consultees and would more appropriately be dealt with as part of a planning application and any associated planning obligation.</p> <p>Criterion (b) requires separate Development Briefs to be prepared for defined neighbourhoods and development parcels. We consider this to be an unnecessary requirement when masterplans are defined in paragraph 3.4 of the DPD as "blueprints" for development and paragraph 3.6 states that Development Briefs provide a detailed framework for development where a full masterplanning approach is not justified. To include this provision would further add to costs and delays in the delivery of new development.</p> <p>We do however welcome the approach in this policy that any masterplan required would not be subject to approval by the local authorities prior to the submission of a planning application thereby reducing any delays in the development process in this respect. Overall, we consider that the need for a masterplan can be assessed on a site by site basis through the validation and pre-application process and that the inclusion of this policy is therefore unsound.</p> <p>Proposed Changes Delete Policy 2.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20017	Comment	<p>Area Action Plans must only be prepared on land which is within the development boundary of the settlement in question.</p> <p>If the area outside defined development boundaries is classified as the countryside, then the core strategy and preferred options chosen must ensure that there is protection to this countryside and existing established buffer zones and all boundaries so that no future significant movements are subsequently made to development boundaries. This is required to protect neighbouring villages and hamlets from urban creep.</p>	This response appears to relate to the relationship between Core Strategies and the definition of countryside. However, it is possible that a masterplan may incorporate areas of countryside. In such cases, the masterplan must respect such designation and accord with all other policies in the LDF.	None
20063	Object	<p>No mention of stakeholders or other recognised parties bodies for local positive input / knowledge* The is no mention of protecting settlement identity*</p> <p>No mention of red lines / boundaries/ buffers to separate encroachment, sprawl and countryside. * Requirement to consult the affected community is not mentioned</p> <p>No mention of resolving infrastructure ie roads , increased / impact traffic from inside & outside development</p>	<p>It is acknowledged that this detail is not contained within the policy. The detail of the consultation requirement will be contained in each council's statement of community involvement and supporting protocol.</p> <p>Boundaries for development will be provided by the proposals map for each council.</p>	None
19846 19848 19855 19861	Object	Reference to concept statements, masterplans and development briefs delay delivery making the plan ineffective and unsound. Policy 2 should be deleted or if not deleted restricted to the larger developments only with a clearly defined threshold after which it will be applied. Policy P2 must not be related to employment sites.	See previous comments in respect of paragraphs 3.4 and 3.5. The objection relating to employment development is not borne out by experience. The Masterplan process can assist in identifying issues at an early stage of the overall development process, avoiding unnecessary costs and providing an degree of certainty prior to the submission of a planning application.	None
20084	Object	The policies contain no reference to need for public consultation. This should, as a minimum, take the form of a public exhibition of the proposals and oblige the promoter to pay regard to the responses received. There should also be a requirement to report in writing to the LPA on the consultation. The report should record the action which it is proposed to take to the comments received.	This objection is noted and it is acknowledged that the policy does not include the advice suggested. It is for each council to require consultation in accordance with its own statement of community involvement and any adopted protocol.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20006	Object	<p>The requirement to produce, concepts statement, masterplans, development briefs, SPDs, design guidance is likely to place a major strain on the Council's resources over the next few years at a time when funding is reduced. There is a danger that developments cannot simply be progressed if the Authority's resources are stretched. The policy results in rigid approach, contrary to the aims of PPS12 which seeks to ensure plans can respond flexibly.</p> <p>Given that Design & Access Statements need to set out the approach to matters within the policy, we consider there is no need for the policy 2.</p>	<p>The concern relating to Council resources is noted - see comments in respect of paragraph 3.5. It is acknowledged that the process may appear rigid, but it may be subject to review if required following adoption. Masterplans may also be developed with a degree of flexibility. Design and Access Statements are not a substitute for a masterplan and its associated public engagement. The masterplan process conforms with the aims of the NPPF in respect of pre-application engagement and front loading.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20237	Object	<p>The St Edmundsbury Core Strategy DPD sets out a requirement for certain sites to be the subject of Concept Statements and Masterplans ahead of the submission of a planning application, such as for strategic growth locations. The above draft policy sets out the matters that should be addressed within these Masterplans.</p> <p>We object on the basis that many of the criteria go beyond the level of detail appropriate for a Masterplan exercise and include matters that should be could either date quickly or should be addressed and considered through the preparation and determination of a planning application. Examples are provided below.</p> <p>Criteria (h) seeks that a Masterplan includes the level of affordable housing provision in line with adopted policy. To address this within a Masterplan document would be premature and quickly become out of date. Since the St Eds Core Strategy DPD was adopted in December 2010 there has been a change in national planning policy in terms of affordable housing tenure with corresponding changes to funding regimes. There is therefore a need to review the change in policy against the provisions of the core strategy DPD which were based on previous assumptions regarding tenure and funding regimes. The level of affordable housing provision is therefore best determined through the submission and negotiation of an application once scheme costs are known together with the availability of public subsidy in the context of the above.</p> <p>Criteria (m) seeks the submission of a travel Plan with the Masterplan. The criterion also seeks confirmation of developer funding towards maximising modal shift together with details of a funding implementation timetable. Again this goes beyond the level of detail that should be required for a masterplan. Whilst the desire to reach agreement and address issues upfront is supported, the level of detail should be appropriate to a masterplan. For example, it is appropriate for a Masterplan to consider scheme phasing requirements in relation to possible highway impacts and options for mitigation measures, however, to require details of funding and timetables is a matter best determined through the assessment of a planning application.</p> <p>Criteria (o) the requirements for inter alia a water butt</p>	<p>The masterplan process has been in existence within the Borough of St Edmundsbury for a number of years and has been the subject of an RTPI award. It is fully compliant with the NPPF, particularly in respect of pre-application engagement and front loading.</p> <p>It is acknowledged that some of the matters referred to could and traditionally have been dealt with at the planning application stage. However, this misses the point of Masterplans, which are designed as part of an overall spatial vision for an area. The amount and level of information required will vary from site to site and according to differing circumstances. Masterplans need not be prescriptive and can build in flexibility.</p> <p>By addressing key issues at an early stage, rather than leaving them to be dealt with by condition of a planning permission, can bring with it a degree of certainty of delivery for all parties involved in the development process.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		per household and litter and doc waste bins are matters of detail that could be addressed on submission of an application or even the subject of conditions.		
<hr/>				
3.6				
19847 19851 19852 19862	Object	<p>Development Briefs act as a barrier to development and should be incorporated into the planning application stage. Any reference to Development Briefs should be deleted from the document.</p> <p>If the Inspector determines that Development Briefs remain it should be clear that they should not be overly prescriptive so as to avoid protracted negotiations on detailed layout issues which are better addressed at the application stage. A threshold of 100 or more dwellings should be set below which a Development Brief is not required as all elements can adequately be addressed at the application stage.</p>	This process should not be seen as a barrier, but should be seen as part of the pre-application engagement and front loading advocated in the NPPF. It can highlight issues and opportunities at an early stage and encourages community involvement.	None
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<i>Policy 3 - Development Briefs</i>				
20111	Comment	Policy is vague about what development types would qualify for a development brief. It appears to be focussed on large scale mixed or residential development schemes. Greater definition is required to ensure effectiveness of the policy.	The policy is intended to relate to any form of development, not just residential or mixed schemes. The need for a development brief will be determined by the criteria including sensitivity of the site or location and the potential impact of development.	None
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20172	Comment	We consider that this policy is unduly restrictive by virtue of the fact that the development brief will need to be agreed prior to the submission of a planning application, and will potentially slow down the planning process or restrict a planning application from being made.	This process should not be seen as a barrier, but should be seen as part of the pre-application engagement and front loading advocated in the NPPF. It can highlight issues and opportunities at an early stage and encourages community involvement.	None
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20030	Comment	<p>In line with our comments on Policy 2, above, we would also appreciate a requirement for Development Briefs to consider Blue Corridors, perhaps under k).</p> <p>Further to this point on SuDS, there will be situations in which parts of developments have multiple uses; for example a sports pitch which is also designated to be flooded in exceptional circumstances. The district council may wish to consider adding the following to section b):</p> <p>b) the mix of uses to be provided on a site, including the potential for areas to have multiple uses, perhaps to support flood risk management.</p>	<p>The suggested amendments would be a positive addition, albeit it is considered to make the policy more generic, and simply refer to the potential for multiple uses per se.</p>	<p>Insert 'including the potential for areas to have multiple uses' after 'site' in section b).</p> <p>Insert ', including blue corridors (areas designated for the channelling of overland flows of water away from property and key infrastructure)' after 'infrastructure' in section k).</p>
20124	Comment	<p>The principles for the preparation of Development Briefs are supported. However, some the requirements, such as a Travel Plan in point l), are considered to be too detailed.</p> <p>The "Note" at the bottom of Policy 3 is useful, and should also be incorporated into Policies 1 and 2.</p>	<p>Noted - the policy does specify 'where appropriate'. A travel plan will not be required in all circumstances.</p> <p>The note at the end relates specifically to Policy 3. It would not be necessary at Policy 1 and would be inappropriate at Policy 2, where, by definition a Development Brief will not be required.</p>	None
20188	Comment	<p>If the Councils wish development briefs to be provided on allocated sites, then it is for the LPA to prepare and adopt the briefs in consultation with developers, stakeholders and local communities. It should not be a requirement of developers/site promoters as this is onerous and covers matters that would normally be included in material supporting planning applications, such as Design and Access Statements, transport Assessments and Parameter Plans etc.</p> <p>The requirement for the preparation of development brief also has the potential to delay proposals and stifle growth. Because of these risks, Policy 3 should be deleted.</p> <p>These representations should also be read in conjunction with the Bidwells (Mr Michael Hendry) representations also submitted on behalf of Persimmon Homes Ltd.</p>	<p>Disagree - Design and Access Statements are not a substitute for a Development Brief and its associated public engagement. The Development Brief process conforms with the aims of the NPPF in respect of pre-application engagement and front loading. It is acknowledged that there is a time element involved, but it should not stifle development, rather it would result in greater certainty when a planning application is submitted.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20150	Comment	<p>Again there should be a clear indication as to what scale of development warrants the production of a Development Brief rather than it being at the discretion of the Council. This would help provide greater certainty when development proposals are being considered.</p> <p>Clarification is also sought as to what is likely to be the "process of consultation" that is to be agreed. The Councils' expectations in regard to community engagement would assist, if reasonable, the development process.</p> <p>It cannot be the case that the Councils will operate a process whereby any matters need to be "approved prior to the submission of a planning application". This needs to be deleted or amended accordingly.</p>	<p>The criticism relating to an apparent lack of guidelines is noted, but a more prescriptive approach would lack the necessary flexibility required to take account of the potential impact of a development. A small development in a particularly sensitive location may have significant implications for a locality, whereas a larger site in a less sensitive area may have little impact. Early engagement with the LPA is advised to ascertain the need for a Development Brief.</p> <p>The process of consultation is addressed in the respective Statements of Community Involvement and/or adopted protocols.</p> <p>The Development Brief process conforms with the aims of the NPPF in respect of pre-application engagement and front loading.</p>	None
20232	Comment	See representation 20111	See representation 20111	See representation 20111
20105	Comment	<p>We consider that this policy is unduly restrictive by virtue of the fact that the development brief will need to be agreed prior to the submission of a planning application, and will potentially slow down the planning process or restrict a planning application from being made.</p>	<p>This process should not be seen as restrictive, but should be seen as part of the pre-application engagement and front loading advocated in the NPPF. It can highlight issues and opportunities at an early stage and encourages community involvement.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20164	Comment	<p>Policy 3 Development Briefs Legally compliant: Yes Sound: No Why unsound: Not justified, effective, consistent with national policy We recognise that local authorities wish to understand how development sites will be planned and delivered. The current validation process requires applicants to submit an appropriate level of information to assist the decision making process and can cover the information requirements set out in Policy 3. The appropriate information is either included in the Design and Access Statement accompanying planning applications, other technical assessments, or forms part of an environmental impact assessment as necessary. Given adopted Core Strategy policies, other policies contained in the Development Management Policies DPD, particularly Policy 1 and current validation requirements there is no justification for potential applicants to also produce a detailed framework for new development in the form of a Development Brief. The introduction of a requirement to specifically produce Development Briefs for development proposals would add a further unnecessary stage in the planning process, adding delay, cost and could undermine the timely delivery of new development.</p> <p>Our concerns that this policy could delay new development are underlined by this restrictive policy which requires Development Briefs to have been through an agreed consultation process and approved prior to the submission of a planning application. The preparation and approval of the Development Briefs would therefore be dependent on the availability of local authority resources. If this approach is taken it would significantly constrain the development process with the effect of delaying and increasing the cost of delivering new development, including essential housing development and exacerbate housing supply issues.</p> <p>It is not clear from the policy what status such a Development Brief would have once approved or the weight that should be attached to it in the decision-making process. PPS12 (paragraph 6.4) advises that</p>	<p>Design and Access Statements are not a substitute for a Development Brief and its associated public engagement. The Development Brief process conforms with the aims of the NPPF in respect of pre-application engagement and front loading.</p> <p>Although approval of development Briefs is dependant upon local authority resources, preparation rests with the landowner/developer. It is acknowledged that there is a time element involved, but it should result in greater certainty when a planning application is submitted.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		local authorities should not produce guidance other than SPD where the guidance is intended to be used in the decision making process.		
20065	Comment	The word "should" to be substituted with MANDATORY. As a basic duty of future care leading to advance thought The need to incorporate a Landscape Assessment / design brief as identified by Residents , Association "Affected" by development. Paid by the "developer" Demand for these should be within "reason" And not add ons Does this allow for Landscaping / buffers prior to development start Will the locals residents have a "approval system" in place to agree or disagree the "Home designs" How will this come about with so much " corridor employment" as the is little local "Skills Business Parks"	The requirements within a development brief need to remain flexible in order to address the differing circumstances for a range of sites and developpment constraints and opportunities. The policy is intended to guide rather than prescribe. The issues raised in this representation may be relevant in certain circumstances, in which case, they would be a consideration in the Development Brief and community involvement.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20110	Comment	<p>We are concerned that Policy 3: Development Briefs does not provide clear guidelines on when and where a Development Brief will be required. Under the terms of this policy development proposals on sites of a size, location or proposed mix of uses and/or significant local interest identified by the Local Planning Authority will be subject to a Development Brief.</p> <p>For the overwhelming majority of development proposals issues such as landscaping, housing mix, parking and vehicular movement can be determined adequately throughout the planning application process without the need for a Development Brief. The requirement for the preparation of a Development Brief should therefore be limited to sites of exceptional importance.</p> <p>The preparation of a Development Brief is a time consuming process and would significantly hinder a development proposal should the applicant not be informed of the need to prepare such a document well in advance. For the purposes of clarity therefore the Council should have clear thresholds over which the preparation of a Development Brief is required, as presently the wording of Policy 3 is too ambiguous. This will allow developers the opportunity to timetable the preparation of a Development Brief at the earliest opportunity and avoid any unnecessary delays. Furthermore, the need for a Development Brief should not be applied retrospectively to sites to avoid unnecessary delays to the planning application process.</p>	<p>The criticism relating to an apparent lack of guidelines is noted, but a more prescriptive approach would lack the necessary flexibility required to take account of the potential impact of a development. A small development in a particularly sensitive location may have significant implications for a locality, whereas a larger site in a less sensitive area may have little impact. Early engagement with the LPA is advised to ascertain the need for a Development Brief.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19856 19857 19858 19863	Object	<p>Development Briefs act as a barrier to development and should be incorporated into the planning application stage. Any reference to Development Briefs should be deleted from the document. If the Inspector determines that Development Briefs remain it should be clear that they should not be overly prescriptive so as to avoid protracted negotiations on detailed layout issues which are better addressed at the application stage. A threshold of 100 or more dwellings should be set below which a Development Brief is not required as all elements can adequately be addressed at the application stage.</p> <p>Development Briefs must not be imposed on employment development as it would further delay very marginal development opportunities and drive development out of the district.</p>	This process should not be seen as a barrier, but should be seen as part of the pre-application engagement and front loading advocated in the NPPF. It can highlight issues and opportunities at an early stage and encourages community involvement.	None
20007	Object	<p>Given that Design & Access Statements submitted as part of a planning application will need to set out the approach to matters within the policy, we consider there is no need for the policy 3.</p> <p>It is unclear what status such a brief will have during the statutory planning application stages.</p> <p>PPS12 advises that local authorities should not produce guidance other than SPD where that guidance is intended to be used in decision-making (para. 6.4 PPS12).</p> <p>The approach is:</p> <ul style="list-style-type: none"> - Not consistent with National Policy - Not justified - Not effective 	Design and Access Statements are not a substitute for a Development Brief and its associated public engagement. The Development Brief process conforms with the aims of the NPPF in respect of pre-application engagement and front loading.	None
3.7 19868 19899	Support	2nd sentence. Suggest word conserved not protected	There is no explanation of what the suggested change would achieve. The interpretation of conserve could be deemed too restrictive. Where conservation is required such as sensitive areas or areas of significant landscape value, there are specific policies elsewhere in the document.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.8				
19967	Comment	Provided such new development does not detract from, or despoil, the natural and local environment.	The essence of this statement is incorporated Policy 4.	None
19990	Comment	Add at the end ' provided such development does not detract from or despoil the natural and local environment'	The essence of this statement is incorporated Policy 4.	None
19869	Comment	Suggest add after recreation and leisure. ,where this does not conflict with the rural character of the area.	The essence of this statement is incorporated Policy 4.	None
19901	Support	Test	Test noted. Paragraph needs to be updated to reflect the changes in the adopted NPPF.	Delete 'emerging' from the first sentence and replace 'the planning system should aim to conserve and enhance the natural and local environment' with 'the planning system should contribute to and enhance the natural and local environment'.

Policy 4 - Development in the Countryside

20067	Comment	Who will be accountable for the decision process to provide this information	Ultimate accountability rests with the Local Planning Authority	None
20181	Comment	We recommend that the importance of protection and enhancement of the historic environment in the countryside should be reflected in this policy - at present only landscape and nature conservation issues are referred to. The environment, identified in para 3.8, should clearly identify and encompass the historic environment. The countryside has been shaped by man over thousands of years, and this history is represented in rural buildings, archaeological remains, formal parks and gardens and the grain of the landscape itself. Further reference to the final draft of the NPPF may also be appropriate.	Agreed	Amend paragraph 3.8 to read "The Government's NPPF advises that 'the planning system should contribute to and enhance the natural and local environment...'" Amend Policy 4 criterion c) to read "there will be no significant detrimental impact on the historic environment, visual amenity...."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20151 20233	Comment	This policy seeks to prevent new or extended buildings in rural areas for commercial purposes. A great many businesses operate in rural areas. To deny them the opportunity for new buildings or extensions, particularly at a time when government policy is seeking the planning system to drive economic growth, will frustrate their ability to grow or in some cases even put businesses at risk. Furthermore, the policy lacks sufficient flexibility. In particular (b) which seeks to prevent the loss of the "best and most versatile agricultural land" is far more restrictive than paragraphs 28 of PPS7 and paragraph 167 of the NPPF which deal with this issue. This policy should be much more flexible so the benefits which may accrue from developing agricultural land can be taken into account.	This policy should be read in conjunction policies 29 and 31 (as amended) which allow for development for economic growth in the countryside. However, as recognised in representation 19916 submitted in response to this policy, the policy as currently worded could be improved. There is no conflict with the NPPF (paragraph 112), which states that areas of poorer quality land should be used in preference to that of higher quality. There are forms of economic development which do not result in the irreversible loss of agricultural land.	Replace "Except where permitted by other policies within this DPD, a new or extended building will only be permitted where it is for:" with "In addition to where permitted by other policies within this DPD, a new or extended building will normally be permitted where it is for:"
20018	Comment	St Edmundsbury Borough carried out its 2nd round site specific allocations / LDF public consultation August - October 2009. The aim of the site specific allocations consultation was to ask the public about the suitability of sites before the council makes decisions. The council intended to make a decision on these preferred sites in 2010. Can I request that it does so now, particularly on the most contested sites ? Otherwise - what was the point of previous consultations ?	This is currently being addressed in St Edmundsbury by the Vision 2031 documents.	None
20066	Comment	Agree in Principle	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19916	Comment	<p>Support for Existing Businesses</p> <p>It is not considered that the restrictive tone of this policy reflects the tenor of the draft National Planning Policy Framework which states (paragraph 81) that 'planning policies should support sustainable economic growth in rural areas by taking a positive approach to new development'.</p> <p>This recent Government advice confirms that the purpose of the planning system is to contribute towards the achievement of sustainable development, and that an assessment of the sustainability of any development should be based on a consideration of its three separate elements, namely its economic, social and environmental impact.</p> <p>Para 11 of the NPPF states that "These three components should be pursued in an integrated way, looking for solutions which deliver multiple goals. There is no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly. The planning system must play an active role in guiding development to sustainable solutions."</p> <p>The wording of Policy 4 is unduly restrictive since it provides a prescriptive list of those uses which new development must be associated with in order to be acceptable within the countryside. As such, it does not allow for the possibility of new development associated with any established business within countryside areas unless the business in question relates to agriculture, forestry or the horse racing industry.</p> <p>The proposed policy fails to recognise the vital role that many existing businesses play in supporting employment and the local economy in rural areas. As such, it conflicts with the thrust of the Government's new agenda which is to make the planning system more and "inherently and unashamedly pro-growth" with a strong presumption in favour of sustainable development (The Plan for Growth - paragraphs 2.11 and 2.13).</p>	<p>The general premise of this objection is that the policy is too restrictive as it provides a prescriptive list of uses which may be acceptable and, by definition, all other uses are excluded. Although category a) provides for alternative forms of development which may require a countryside location, the policy as drafted effectively precludes them due to the prescriptive list. This could be resolved by replacing the word 'only' with 'normally' in the sentence between d) and e). This would also reflect guidance in the NPPF.</p>	<p>Replace "Except where permitted by other policies within this DPD, a new or extended building will only be permitted where it is for:" with</p> <p>"In addition to where permitted by other policies within this DPD, a new or extended building will normally be permitted where it is for:"</p>

<i>Representations</i>	<i>Nature Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>Accordingly, it is requested that Policy 4 be revised by the inclusion of an additional category of development which can be considered appropriate within the Countryside providing that it can be considered a 'sustainable' form of development having weighed its economic, social and environmental impacts. The suggested wording of this addition is: " (k) it is associated with a lawfully established existing business, would provide economic benefits and could be achieved without detriment to the character or amenities of the area".</p> <p>Justification for Development within the Countryside Paragraph (a) of Policy 4 indicates that new development may be permitted where "there is a justification for the development to be located in the countryside". Further amplification of this clause is requested in order to ensure that it would include certain specialist retail uses such as nurseries, garden centres and farm shops.</p> <p>The National Planning Policy Framework states (inter alia) at paragraph 6 that Local Planning Authorities should "set policies for the consideration of retail or leisure proposals which cannot be accommodated in or adjacent to town centres". This reflects existing advice contained within PPS4 Planning for Sustainable Economic Growth which requires local planning authorities to ensure that their development plans support existing business sectors (Policy EC2.1b).</p> <p>Policy EC2.1d indicates that development plans should seek "to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use and, subject to the specific policy requirements of this PPS for town centres, reflects the different location requirements of businesses, such as the size of site required, site quality, access and proximity to markets, as well as the locally available workforce" (my emphasis).</p> <p>Garden centres comprise one such retail use being distinct in character and having specific locational requirements which make it best suited to a countryside site. Typically, they require a high</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>proportion of open land for the display of plant material which can be provided without detriment to the open character of their location. They also tend to sell low value, bulky products that are not economically viable to retail within the High Street.</p> <p>Accordingly, the policy requires further elucidation to refer specifically to the fact that some retail uses require a countryside location. Such an approach would be entirely consistent with up to date Government guidance.</p>		
19902	Comment	Trust that (c)(no significant detrimental impact on visual amenity of landscape) will apply to proposed NE extension to Haverhil vis a vis its impact on the hamlet of Calford Green	This is an issue which is being addressed in the Haverhill Vision 2031 document.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20022	Comment	<p>Under this Policy the planning authority seeks to control development within the Countryside. Unfortunately for this Policy to be effective it is necessary to provide plans identifying both the urban areas as defined as the Countryside. It does not appear that this exercise has been done and no plan appears in the Preferred Options document. As such therefore we cannot distinguish the urban area of Bury St Edmunds from the countryside. The Plan therefore must be unsound in this respect alone.</p> <p>In addition there is no information in the Preferred options document that the planning authority have carried out an appropriate and rigorous identification of the boundaries of settlements such as Bury St Edmunds to determine whether or not land should be properly included either within the urban area or within the Countryside. Without this rigorous research and identification the planning authority are not properly carrying out their duty to review the previous Development Plan, consider appropriate growth and re-consider what should be the appropriate boundaries of the town. In this respect the Preferred Options document is unsound.</p> <p>In terms of the Policy itself the Policy gives no credence to development within or as part of existing developed complexes such as Nowton Court. In addition where there is a demonstrable over-riding need such as that for "care for the elderly" then that should feature as a positive reason for allowing development in the Countryside rather than the alternative of a simple justification. Further there should be an acknowledgement or recognition that development of "brownfield sites" in the Countryside should have a presumption in favour of reasonable alternative development and use. The present Policy 4 is unsound in that it has not considered the above reasonable points in the feamework of the Policy guidance.</p>	<p>The plans identifying the countryside and the housing settlement boundaries are included in the Proposals Map, which is a separate document.</p> <p>The boundaries of the town have been rigorously reviewed following the adoption of the Core Strategy and are included in the Bury St Edmunds Vision 2031 document and identified in the proposals Map.</p> <p>The policy does provide the necessary flexibility, particularly when used in combination with Policy 23. No justification is given in the representation as to why "care for the elderly" should be a positive reason for allowing development in the countryside, away from sevicees and facilities.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19993 19996	Comment	The policy is restricted to affordable housing which is dependent on high levels of grant funding. The New National Planning Policy Framework (NPPF) makes reference to the inclusion of housing for sale on rural exceptions sites to cross subsidise affordable housing for rent and shared ownership. Policy 4 should take account of the NPPF and allow a minority of the site to be developed as housing for sale. Sale could have a restriction period giving local people the priority for purchase for their only residence and the dwellings should be of a type to meet an identified local housing need.	The NPPF at paragraph 55 advises that LPA's should consider whether allowing some market housing would facilitate the provision of significant affordable housing to meet local needs. Policy 4 as drafted will not preclude this from happening, but including an element of market housing in this policy, or policy 50 could raise expectations in all cases, with a consequential increase in land values to the detriment of the delivery of affordable housing.	None
19968	Comment	b)the irreversible loss of best OR most versatile agricultural land	The wording in the policy reflects the guidance in the NPPF (paragraph 112)	None
19900	Comment	Policy 4b states that agricultural land in Grades 1-3a will not be permissible for development. This is in direct conflict with the St Edmundsbury Core Strategy which proposes development of 1250 houses to the south-east of Bury St Edmunds on land currently beyond the housing settlement boundary and therefore of countryside status. The agricultural land that would be under the footprint of this development is clearly Grade 3a, according to the published criteria (see DEFRA website and verbally confirmed by Natural England). It also largely lies within a Special Landscape Area. This conflict needs to be resolved.	The area identified is a Strategic Growth Area identified in the St Edmundsbury Core Strategy. As such, it will no longer be classified as countryside.	None
19870 20173	Comment	We consider that the wording of this policy is unduly rigid and may stifle potential development opportunities involving the reuse of existing developed sites that could enhance the visual amenities of the countryside. Nor is it consistent with para 9 of PPS7 which supports all types of housing for local people on land adjoining existing villages.	This policy should be read in conjunction with other policies which allow for development for in the countryside. However, as recognised in representation 19916 submitted in response to this policy, the policy as currently worded could be improved.	Replace "Except where permitted by other policies within this DPD, a new or extended building will only be permitted where it is for:" with "In addition to where permitted by other policies within this DPD, a new or extended building will normally be permitted where it is for:"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19909	Comment	<p>Nowhere in the Consultation paper can we find any provision for self-build sites or being built by a contractor for the individual! Self build homes rely on being affordable because they ultimately mean that the owner has a stake in the home and are often more environmentally friendly and built to a higher standard. In most European countries having your own property is very much encouraged and has an important impact on the housing needs of an area. Also, the planning system does not seem to allow owners of land to put in plots for self-build with the services connected to sites without very detailed planning.</p> <p>With the extension of old agricultural sites under the new planning regulations will become brown field sites. No mention of this is made in your planning document as these sites would be ideal for affordable housing.</p> <p>Building a development in bigger so called "sustainable villages" gives no opportunity for smaller communities to become more sustainable and services to that community becoming more viable. Whilst do we not want to see good farming land covered with loads of houses altering the character of the area in which we all live, the constraints of village boundaries reduces the availability of affordable properties to youngsters within their communities. A small number of properties being developed in so called "unsustainable villages" would be preferable to large scale building in so called "sustainable villages".</p> <p>For instance, in Gazeley, early last year, we struggled to keep our public house open. We have no children's activities, the church and Women's Institute all struggle with membership. Extra housing would revitalise the village and stop it becoming dormant, mainly for the elderly and rich who do not take any part in village life!</p> <p>More housing would offer young people a good value</p>	<p>It is acknowledged that there are no policies relating specifically to self build sites as it is not the role of development management policies to determine who should be able to build homes. Conversely, the policies in no way restrict the ability for any site to be a self build site.</p> <p>Other issues raised relate primarily to the settlement policy identified in the respective Core strategies, rather than the Development Management Policies.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>of life set in pleasant countryside. There would be more volunteers to participate in village activities, such as the cricket and football teams. The table tennis team is likely to close shortly due to a lack of leadership!</p> <p>We have no wish for large scale housing development as at Red Lodge (which was built on good farming land and now has sewage problems). Gazeley has only very few infill sites left and will stagnate unless more housing is allowed. Two bungalows were built in Highwood Crescent and residents are now complaining about the cricket balls coming into the properties! They should not have been allowed to build next to the cricket pitch in the first place!</p>		
20189	Comment	Policy 4 will need to be assessed against the requirements in the NPPF when published. There will be no need to repeat national policy.	Noted - see representation 20181	See representation 20181
20057	Object	Policy 4 is excessively restrictive in seeking to define all the circumstances in which development in the countryside will be permitted. The Policy must be amended to allow the development management process to respond with appropriate flexibility to planning proposals in as yet unforeseen 'exceptional circumstances' which may justify particular development proposals, for instance in response to acute housing need in the countryside. This approach has been successfully pursued in the current Local Plan policies, and in a similar context with national Green Belt policy. Insufficient flexibility would make the policy inconsistent with national planning policy guidance.	It is not considered excessively restrictive as it seeks only to restrict inappropriate development. However, it is acknowledged that the use of the word 'only' between categories d) and e) could contradict the flexibility of the first part of the policy and it is recommended elsewhere that 'only' be replaced with 'normally'.	The word 'only' be replaced with 'normally' between categories d) and e).

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20008	Object	<p>Housing settlement boundary of Bury St Edmunds has not yet been amended and strategic urban extensions might be seen as outside the urban areas. Therefore tension between Policy 4 and Core Strategy until the settlement boundaries are re-drawn. Either, introduction to policy needs amending to refer to the urban extensions or an additional criteria needs to be added.</p> <p>Approach to Best and Most Versatile is inconsistent with PPS7 - B&MV is a factor to weigh alongside other sustainability criteria rather than a blanket approach of its protection.</p> <p>Add new criterion "the Core Strategy has identified a direction of growth"</p>	There is no conflict. The Core Strategy for St Edmundsbury states that boundaries will be identified by Area Action Plans. For Bury St Edmunds, this is being delivered through the Bury St Edmunds Vision 2031 document, separate from the Development Management DPD.	None
<hr/>				
<i>3.11</i>				
20031	Comment	<p>The county council supports this policy, though we would request an articulation of our preference for systems that allow overland flows of flood water, over piped systems. A sentence inserted between 3.11 and 3.12 might read as follows:</p> <p>'Surface water run-off systems should not be buried, unless there is no alternative. Overland systems will be considered preferable to piped systems for ease of maintenance and increasing public awareness of the impact of water.'</p>	Agreed	<p>Add sentence at end of para 3.11 as follows:</p> <p>'Surface water run-off systems should not be buried, unless there is no alternative. Overland systems will be considered preferable to piped systems for ease of maintenance and increasing public awareness of the impact of water.'</p>
<hr/>				
19926	Comment	St Edmundsbury, and in particular the area around Haverhill, has fewer park areas than the rest of Suffolk. The NE Haverhill proposals should try to address that whilst also considering problems that will be caused by run off if the area is heavily built on	Noted	None
<hr/>				
<i>3.12</i>				
19927	Support	The area proposed for NE Haverhill could be at risk from increased flooding once the services have been put in	Noted - the purpose of this section is to ensure that the risk of flooding is not increased.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 5 - Flooding and Sustainable Drainage</i>				
20125	Comment	<p>The requirements for all development schemes to address rainwater harvesting and greywater recycling is a new policy approach. It is questioned where the reasoning and justification for these specific elements of sustainable development are set out. There are currently no specific references within the document.</p> <p>It is also questioned how these requirements will work with emerging drainage standards, national obligations, and current regulations. There appears to be growing contradictions between local and national requirements, which would suggest this policy is 'unsound'.</p> <p>There is a genuine concern amongst developers and house builders about the amount and complexity of guidance, standards, and requirements that is either existing, being amended or emerging in relation to flooding and drainage issues.</p> <p>For example there is: the Flood and Water Management Act 2010; the emerging Sewers for Adoption 7th Edition (release date spring 2012); statutory undertakers requirements; EA requirements; planning and building regulations; plus the Code for Sustainable Homes. This illustrates the burden that is being placed on developers and house builders, and how it can lead to problems in understanding and interpretation of what is being expected. Trying to comply with so many differing standards could end up restricting development, which would be contrary to the Government's intentions towards the growth of the economy.</p> <p>This local policy will only add to this already difficult and complex situation. As such, Policy 5 should be removed.</p>	<p>This has now been "softened" to a requirement to for schemes to address "water recycling (e.g. rainwater harvesting and greywater recycling)" which is less specific. It should be noted that asking a scheme to "address" something is not same as requiring its inclusion - it should be regarded more as a point for consideration.</p> <p>The key justification for this is the fact that St Edmundsbury is located in an area of low rainfall.</p> <p>All of the requirements in Policy 5 are in conformity with national legislation (e.g. the Flood and Water Management Act (2010), the Building Regulations Part G and the Code for Sustainable Homes/BREEAM). It is therefore unclear what "growing contradictions between local and national requirements" are being referred to here.</p> <p>The rationale behind including these requirements in Policy 5 is to ensure that potentially significant design features are considered at an early stage and are compatible with other planning requirements on the site. However, much of the effort needed to comply with this policy will also contribute to compliance with the national regulatory regimes referred to in the comment and therefore does not need to be regarded as an additional burden.</p>	<p>Amend second paragraph to read 'Flooding, water recycling (e.g. rainwater harvesting and greywater recycling), and run-off.....'</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20097	Comment	<p>Thank you for the opportunity to comment on the Forest Heath District Council and St Edmundsbury Borough Council Joint Development Management Policies Preferred Options Consultation. We have no concerns and support the inclusion of surface water management and water efficiency requirements.</p> <p>Surface Water Management, following the hierarchy set out in Part H of the Building Regulations and PPS25, is important in managing flood risk. Additionally, adequate surface water management contributes to climate change mitigation and adaptation. We therefore support the sentiment within Policy 5 that ensures developments consider surface water management through SuDS.</p> <p>Prudent use of natural resources is fundamental to achieving sustainable development. We support the requirement for water efficiency in Policy 6.</p> <p>Please do not hesitate to contact me on the details below should you wish to discuss this further.</p>	Noted	None
20174	Comment	This policy states for all applications details on flooding, rainwater harvesting, SUDs etc. have to be submitted appropriate to the scale of proposal. It is considered that this is too vague and could be unduly onerous and unnecessary for small scale schemes.	The use of the word 'appropriate' is essential to ensure the policy is not unduly onerous for small schemes. However, this does not remove the necessity for such issues to be addressed.	None
20190	Comment	Policy 5 appears to be more an item for a "validation checklist". Unless it is redrafted to provide more informed guidance/advice on how the impact of proposals on flood risk and drainage will be assessed; or how the approach to flood risk/drainage may vary in the two districts compared to the national approach, it is not necessary.	The rationale behind including these requirements in Policy 5 is to ensure that potentially significant design features are considered at an early stage and are compatible with other planning requirements on the site. It is therefore considered to be a necessary re-iteration of the national approach.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20152	Comment	Policies 5, particularly in relation to internal features, 6 & 7 are considered unnecessary because their content is already effectively covered by Building Regulations. If the respective Councils are going to seek standards which exceed Building Regulations then it should be made clear why such exceptional circumstances exist within the Councils' administrative areas. If the policies are to remain they lack sufficient flexibility to be sound and in accordance with PPS12 or the NPPF.	Disagree. The issues raised by Policy 5 need to be addressed as part of the wider spatial planning considerations, particularly where it impacts upon issues such as layout and the use of land and open space. These issues cannot be addressed by Building Regulations alone.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20106	Comment	<p>The DPD makes reference to the water environment and water resources with specific policies mentioning habitats, sustainable design and leisure and specific section on Flooding and Sustainable Drainage (policy 5). Significant regulatory changes are being introduced which will have an impact on how the water environment is managed. These include:</p> <ul style="list-style-type: none"> * The Water Framework Directive (WFD) which looks at the ecological health of surface water bodies as well as achieving traditional chemical standards. The impact of the Directive on water resource, habitats and abstraction will be felt increasingly through the decade as surface and groundwater quality and quantity has to be improved under EU statute * The Suffolk Local Flood Risk Management Strategy required under the Flood and Water Management Act 2011. <p>It is worth noting that the absence, rather than the excess, of water is going to be a critical problem during the life of the DPD with East Anglia declared in drought by the Environment Agency following seasonally low winter rainfall during 2011.</p> <p>The DPD does not address water management in as coherent or comprehensive manner as it could with a strong bias towards flooding and urban design. The section - Flooding and Sustainable Drainage - of the DPD should be extended to consider water management as well as flooding and drainage. Paragraph 3.10 does not consider the role of rivers and drains as a means of water augmentation schemes which are a tool used by the water companies with Environment Agency agreement for water catchment</p>	<p>The policy is intended primarily to address flooding and sustainable drainage as the title implies, although, through the methods advocated it does also address elements of water management which also form part of policy 6.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		management and ensuring sufficient drinking water. It is acknowledged that the use of Code for Sustainable Homes (CSH) and BREEAM in Policy 6 - Sustainable Design and Construction - address the need to reduce water demand.		
20104 20168	Comment	Section 3.9 refers to the NPPF. It must be noted that the NPPF is still in its Draft format and changes to it are likely to take place prior to its publication. Whilst the Draft NPPF identifies the overall objectives for directing development away from flood risk sensitive areas, it does not classify some of the terms that it uses (i.e. Sequential Test / Exception Test). In the absence of any clear indication of the way to interpret the policy, we would recommend that the interpretation of flood risk issues, such as the sequential and exception tests be clearly stated within the DMP Document. This is, of course, subject to the format or what details are contained within the finalised NPPF (and any supplementary planning guidance). The details of the Joint Level 1 Strategic Flood Risk Assessment (SFRA) could be used to inform any planning policy. As stated above, we would be happy to work together with your Authority in the development of a suitable and robust policy on this issue for incorporation within the revised Local Plan.	The draft NPPF has now been superseded by the adopted NPPF which addresses these issues at Section 10.	None
20009	Object	Care is needed with the imposition of supposedly sustainable technologies as evidence suggests such technologies may actually be having the opposite affect to reducing carbon and water footprints. Accordingly, we strongly recommend that policy is flexible and pragmatic so as to adopt and or adapt to emerging evidence.	Comments are noted. The wording of the policy is not considered inflexible and should be capable accommodating emerging evidence.	None
20068	Support	Accept	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.13</i>				
19969	Comment	Manufacture of component parts, on site construction and removal following decommissioning will be taken into account when quantifying resource consumption	Agree that the resource consumption and CO2 emissions associated with construction and decommissioning should be quantified and reduced where possible.	Amend to read '.....resource consumption during construction, throughout operation and where relevant, removal and also how it is located.....'
20020	Comment	Flood Risk Assessments should factor in the increased risks predicted with climate change and pay particular attention to areas "down hill" and prove that new development will not increase risk of flooding elsewhere. This is particularly important when proposals are near to areas or individual properties that already at risk. Flood risk mitigation measures may be required to achieve resistance and resilience to any properties that may become adversely affected. Where developments reduce the natural soak away, and existing drainage infrastructure is already strained, new drainage infrastructure should be built to cope with the section of the settlement affected.	These issues should be addressed in the implementation of Policy 5.	None
<i>3.16</i>				
19928	Support	I support this	Noted	None
<i>Policy 6 - Sustainable Design and Construction</i>				
20169	Comment	Preferred Policy 7 is supported as it will require sustainable construction in new developments.	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20098	Comment	<p>Thank you for the opportunity to comment on the Forest Heath District Council and St Edmundsbury Borough Council Joint Development Management Policies Preferred Options Consultation. We have no concerns and support the inclusion of surface water management and water efficiency requirements.</p> <p>Surface Water Management, following the hierarchy set out in Part H of the Building Regulations and PPS25, is important in managing flood risk. Additionally, adequate surface water management contributes to climate change mitigation and adaptation. We therefore support the sentiment within Policy 5 that ensures developments consider surface water management through SuDS.</p> <p>Prudent use of natural resources is fundamental to achieving sustainable development. We support the requirement for water efficiency in Policy 6.</p> <p>Please do not hesitate to contact me on the details below should you wish to discuss this further.</p>	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20191	Comment	Policy 6 appears to repeat the requirements of Part L of the building regulations, and does not need to be restated. Also, it is inappropriate for the policy to require certain types of development to perform above national requirements. If the Council insists on such an approach it will have to demonstrate that it is both technically and financially viable and deliverable.	<p>The Code for Sustainable Homes, while a "nationally described standard" (and therefore acceptable under the NPPF) is not mandatory and therefore imposing a target under the Code cannot be viewed as duplicating national policy.</p> <p>While the timetable for introducing Code Levels (i.e. stepping up to Level 4) has been deliberately chosen to ensure that the mandatory CO2 reduction requirements set are no greater than the requirements of Part L, this is not considered a duplication of national policy for two reasons:</p> <ol style="list-style-type: none"> 1. Including the CO2 reduction of Part L in a planning policy ensures that an energy strategy is defined at an earlier stage than the building consent phase, and also means that any conflicts with the energy strategy and other planning issues (e.g. visual appearance) can be resolved as part of the planning process. 2. The Code for Sustainable Homes covers a wide range of issues in addition to energy, many of which can be addressed at limited additional cost and thus imposing a Code level is one of the most effective ways of ensuring a wide range of sustainability measures are delivered in new development. 	None
20234	Comment	Policy 6 covers sustainable design and construction principles in line with BREEAM Guidance. Such guidance includes a number of different development types that are excluded from the requirements of BREEAM, one of which is minerals and associated development. As drafted, this policy does not take account of this variance and is therefore not justified in its application. We would suggest that the policy be amended to relate to development types covered under BREEAM only.	Minerals development would be considered at a County level and would not, therefore, be considered against policies in this document.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20165	Comment	<p>We recognise the need to seek to address the issue of climate change and the role of sustainable design and construction in doing so. Sustainable construction methods and criteria are being introduced nationally through the Code for Sustainable Homes and through Building Regulations.</p> <p>As the energy performance of a development proposal would be assessed against the relevant Building Regulations or Code for Sustainable Homes requirements in place at the time planning permission is granted, there is however no justification for a policy on sustainable design and construction in this Development Management Policies DPD. PPS1 (paragraph 30) advises that planning policies should not replicate, cut across or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building Regulations for energy efficiency.</p> <p>Proposed Changes Delete Policy 6.</p>	<p>This comment is based on the PPS1 supplement which has now been superseded by the National Planning Policy Framework (published 27/3/12) which does not contain the same statement and rather states:</p> <p>"Local planning authorities should... when setting any local requirement for a building's sustainability... adopt nationally described standards" (95)</p> <p>Moreover, the Code for Sustainable Homes, while a "nationally described standard" (and therefore acceptable under the NPPF) is not a "regime" in the sense of being mandatory and therefore imposing a target under the Code cannot be viewed as duplicating national policy.</p> <p>While the timetable for introducing Code Levels (i.e. stepping up to Level 4) has been deliberately chosen to ensure that the mandatory CO2 reduction requirements set are no greater than the requirements of Part L, this is not considered a duplication of national policy for two reasons:</p> <ol style="list-style-type: none"> 1. Including the CO2 reduction of Part L in a planning policy ensures that an energy strategy is defined at an earlier stage than the building consent phase, and also means that any conflicts with the energy strategy and other planning issues (e.g. visual appearance) can be resolved as part of the planning process. 2. The Code for Sustainable Homes covers a wide range of issues in addition to energy, many of which can be addressed at limited additional cost and thus imposing a Code level is one of the most effective ways of ensuring a wide range of sustainability measures are delivered in new development. 	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20126	Comment	<p>The importance of design in maximising the energy efficiency of a development is acknowledged and supported. However, the aim of achieving Code Level 3 (and later Code Level 4) through the Code for Sustainable Homes, and BREEAM rating "very good" is not supported.</p> <p>It is unfortunate, but the principle of the Code has been lost within the approximately 300 pages of technical documentation, which presents a host of unjustifiable costly requirements that impact on a development's viability.</p> <p>It is felt the individual circumstances of a development must be considered by the respective Local Authority on its own merits. The current wording of the policy is therefore considered to be too rigid and does not allow for any element of flexibility.</p> <p>The final paragraph indicates there will be opportunities for some development to go beyond these requirements, which will be set out in Area Action Plans, Concept Statements and then Masterplans and Development Briefs. It is highly recommended these are discussed with developers, landowners and agents as early as possible. This will ensure sites are properly planned, and will avoid any site from stalling due to unachievable expectations. It is considered unjustifiable and unreasonable to expect developers and house builders to sign-up to increasingly changing standards, when they are unsure what they will be agreeing to and what the cost implications will be. Therefore, Policy 6 should be removed.</p>	<p>The policy does not preclude individual circumstances being taken into account, but the Code does provide an objective measure which can be applied uniformly.</p> <p>It is acknowledged that surpassing these requirements in Area Action Plans and Concept Statements will need to be the subject of discussions at an early stage. However, Area Action Plans and Concept Statements are both subject to public participation, which would include developers, landowners and agents.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20010	Object	<p>The policy requires compliance with other regimes, notably the Code for sustainable Homes and the building regulations. This is unnecessary and burdensome. Paragraph 11 of the supplement to PPS1 makes it clear that the controls under planning and other regulatory regimes should not duplicate each other.</p> <p>The energy requirements are dealt with via the Building Regulations, and therefore inclusion within the plan of such an approach is contrary to the supplement to PPS1, paragraph 11.</p> <p>The approach is:</p> <ul style="list-style-type: none"> - Not consistent with National Policy - Not justified <p>and should be deleted</p>	<p>This comment is based on the PPS1 supplement which has now been superseded by the NPPF which states:</p> <p>'Local planning authorities should....when setting any local requirement for a building's sustainability adopt nationally described standards'</p> <p>The Code for Sustainable homes while a 'nationally described standard' (and therefore acceptable under the NPPF) is not a 'regime' in the sense of being mandatory and therefore imposing a target under the Code cannot be viewed as duplicating national policy. While the timetable for introducing Code Levels (i.e. stepping up to Level 4) has been deliberately chosen to ensure that the mandatory CO2 reduction requirements set are no greater than the requirements of Part L, this is not considered a duplication of national policy for two reasons:</p> <ol style="list-style-type: none"> 1. Including the CO2 reduction of Part L in a planning policy ensures that an energy strategy is defined at an earlier stage than the building consent phase, and also means that any conflicts with the energy strategy and other planning issues (e.g. visual appearance) can be resolved as part of the planning process. 2. The Code for Sustainable Homes covers a wide range of issues in addition to energy, many of which can be addressed at limited additional cost and thus imposing a Code level is one of the most effective ways of ensuring a wide range of sustainability measures are delivered in new development. 	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20238	Object	Draft Policy 6 states that all new dwellings will normally be required to meet Code level 3 of Code for Sustainable homes, with Code Level 4 once updates to Part L of the Building Regulations come into effect. In our view the policy is not sufficiently flexible to deal with changing circumstances and should state that dwellings should meet the Government's prevailing code at the point of submission of the planning application.	<p>As the Code for Sustainable Homes is not a mandatory requirement under national policy or legislation (except in the case of social housing) it does not make sense to refer to the "Government's prevailing code". Policy 6 therefore seeks CSH Levels in line with the proposed update to Part L and specifically includes the words "or an equivalent standard where appropriate" in order to maintain a flexible approach.</p> <p>The policy does need to be adjusted to take account of forthcoming updates to Part L of the Building Regulations. Clarification of the forms of development to which the policy applies would also assist.</p>	<p>Add new paragraph at top of policy: 'All proposals for new development including the re-use or conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction.'</p> <p>At end of third paragraph add: '...until 2013 when developments will be required to meet BREEAM "Excellent" standard or equivalent. New non-residential developments below this threshold will also be encouraged to meet this standard.'</p> <p>Amend first sentence in fourth paragraph to read: 'The submission of Code for Sustainable Homes or BREEAM pre-assessment reports (as appropriate), will...'</p>
20069	Support	Accept	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 7 - Improving Energy Efficiency</i>				
19981	Comment	<p>I would like to comment on policy 7 as follows:-</p> <p>While I support the drive for greater energy efficiency and lower CO2 emissions, the policy requiring an additional 10% reduction in residual carbon emissions over and above the Building Regulation minimum may create opposition from developers (and the risk of an increased numbers of appeals) since the Building Regulations standards are at present increasing with a goal that "zero Carbon" buildings will become the norm in 2016 for new domestic and 2018 for new commercial buildings.</p> <p>The current Building Regulation standard is equivalent to a Code for Sustainable Homes level 3, and next April (2013) when the next Building Regulation amendments come into force, Level 4.</p> <p>The evidence for complying with policy 7 is proposed to be a TER/DER indicating the predicted CO2 emissions. This is VERY unlikely to be provided as the detail required to calculate the rates would mean the developer has to specify the make and model of the heat producing appliance, the heating controls, the full constructional specification including possible additional re-newable or low carbon technologies (Solar heating, Photovoltaic panels etc..) The solar and PV panels may well be required to meet the Building Regulations minimum.</p> <p>If the scheme when built, does not meet the 10% (due to Air leakage tests or minor site revisions), would the Planning Enforcement then require additional retrospective measures to be carried out on site.(Change of boilers, additional fitting of PV panels, Solar water heating, etc)?</p>	<p>Comments are noted. It is unlikely that retrospective measures will be required unless there are significant differences between forecast and actual performance.</p>	<p>Give further consideration to the evidence requirement for predicted CO2 emmissions.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20166	Comment	<p>Policy 7 proposes a new local standard, requiring a 10% reduction in residual CO2 emissions in all buildings after compliance with Building Regulations Part L. Whilst we recognise the need to seek to address the issue of climate change and the role of sustainable design and construction in doing so, we are concerned that the policy introduces a higher standard of provision for improvements to energy efficiency over that required by Building Regulations without the evidence base to justify such an approach. The Supplement to PPS1 (paragraph 33) is clear that in testing local requirements for sustainable buildings planning authorities should ensure that what is proposed is evidence-based and viable, having regards to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities. This approach could prejudice the delivery of new development, including new housing schemes that are required. The policy states that the 10% reduction in residual CO2 emissions after compliance with Building Regulations Part L can be achieved through 'carbon compliance' and then specifies those measures. We support the reference to a "combination of energy efficiency measures" as this provides flexibility for potential applicants to also consider the use of 'passive' (through fabric solutions) and 'operational' (through operation and heat recovery solutions) energy saving solutions to achieve the additional 10% reduction in CO2 required by the policy. Reference to these options should be made in the explanatory paragraphs (currently unnumbered) preceding this policy.</p> <p>The policy states that "planning approval will be dependent on" the provision of design stage and asbuilt Building Control Compliance documentation. Clarification is required over whether it is intended that planning permission will not be granted until the submission of these documents or if such information will be required to satisfy any planning condition that may be attached to a planning permission in this respect. Clarification is also required as to what is meant by 'as-built Building Control Compliance documentation' and whether such</p>	<p>This is not strictly a "new local requirement" so much as a variant on a commonly-used policy type e.g. found in:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The London Plan Policy 5.2. <input type="checkbox"/> Ashford Core Strategy Policy CS 10. <input type="checkbox"/> South Cambridgeshire Development Control Policies NE1 and NE3. <input type="checkbox"/> London Borough of Sutton Site Development Policies Policy DM6. <p>It is also consistent with one of the requirements in St Edmundsbury's Core Strategy Policy CS2 Part J, for new development to consider "Energy and CO2 Emissions - seeking, where feasible and viable, carbon neutral development, low carbon sources and decentralised energy generation"</p> <p>The supporting text has now been updated to include more detailed reference to the energy hierarchy as suggested in this comment. Further clarity on the process issues (around Building Control Compliance documentation) will be provided in an amended issue of the policy.</p>	Need to consider clarification in respect of documentation requirements.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>information is likely to be available either prior to the determination of a planning application or to enable the discharge of a planning condition prior to the commencement of development depending on the outcome of the above.</p> <p>Overall, it is considered that there is no justification for the introduction of a new local standard for energy efficiency in this policy, above that required by Building Regulations at the time that any planning application is determined. Such an approach is contrary to the established advice in PPS1 (paragraph 30) and its Supplement (paragraph 11) that planning policies should not replicate, cut across or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building Regulations for energy efficiency.</p> <p>Proposed Changes Delete Policy 7.</p>		
20192	Comment	It is inappropriate for the policy to require certain types of development to perform above the policy requirement, unless it can be properly and robustly justified. This will require the Councils to demonstrate that requiring higher efficiency targets on qualifying sites are both technically and financially viable and deliverable.	The justification is provided in the evidence base.	None
20170	Comment	Preferred Policy 7 is supported as it will require sustainable construction in new developments.	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20127	Comment	<p>The intention to mitigate climate change and to reduce CO2 emissions is supported. However, the wording of this policy suggests there should be a further 10% reduction in residual CO2 emissions "after" Building Regulations Part L compliance. This target seeks to go beyond accepted regulations. As such, this policy is not supported.</p> <p>It is interesting to note that Policy 7 indicates the Local Authorities will exert an element of flexibility regarding viability. A similar principle and wording could be incorporated into Policy 6.</p> <p>There is a specific reference within this policy to on-site renewable technologies, which is also referred to in point p) of Masterplan Policy 2. This will be an additional cost to the developer that must also be taken into account when assessing the viability of a scheme as a whole. It is suggested that a 'fabric first' approach would be a better solution rather than using on-site renewables, particularly in relation to reducing CO2.</p> <p>The penultimate paragraph again indicates there may be opportunities for some development to go beyond these requirements, which will be set out in Area Action Plans, Concept Statements and then Masterplans and Development Briefs. It is again recommended that any specific sites should be discussed at an early stage.</p> <p>The "Note" at the bottom of the policy suggesting there will be additional information and guidance provided by the Local Authorities in the future. It insinuates this information has yet to be prepared, and it is therefore questioned how this policy can be implemented without supporting guidance or reasoned justification.</p>	<p>See responses in respect of representations 20011 and 20166.</p> <p>It is acknowledged that surpassing these requirements in Area Action Plans and Concept Statements will need to be the subject of discussions at an early stage. However, Area Action Plans and Concept Statements are both subject to public participation, which would include developers, landowners and agents.</p> <p>Although additional guidance may be beneficial, it is not essential for the implementation of the policy and the justification already exists as part of the evidence base underpinning the policy.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20239	Object	<p>The policy seeks a '10% reduction in residual CO2 emissions in all buildings as after Building Regulations Part L compliance has been demonstrated'.</p> <p>To ensure clarity in application we would suggest that the policy express the percentage target to be applied flexibly. Moreover as Building Regulations change over time, with the requirements often changing from scheme design to implementation, with the option for developers to register schemes to meet certain Building Regulations, the policy should relate to Building Regulations at a fixed point in time such as 2010 to ensure consistency in approach and clarity in terms of compliance requirements.</p> <p>The policy also states that planning approval will be dependent upon the provision of design stage and as built compliance documentation showing Target Emission Rate and Dwelling Emission Rate. We would highlight that the mechanism for ensuring compliance should be determined having regard to the proposal scheme and means to achieve the 10% target with conditions imposed as appropriate. To define the mechanism for compliance through policy is inflexible.</p>	<p>It is acknowledged that the requirements will have to change over time in line with the building Regulations.</p>	<p>Amend the policy to read '...emissions in all buildings after compliance with the current/prevaling version of Building Regulations Part L (until such time as zero carbon standards are required under Part L) has been demonstrated....'</p>
20011	Object	<p>The policy is inconsistent with Policy 6 which seeks compliance with Code and building regulations. This seeks to improve on carbon reductions by a further 10%. However, there is no assessment of the costs of achieving this in the evidence base, nor of the impact on housing delivery, as required by the supplement to PPS1 and its Supplement.</p> <p>The approach is - Not consistent with National Policy - Not justified</p> <p>and the policy should be deleted</p>	<p>Disagree that the policy is inconsistent with Policy 6 which sets out broad sustainability standards. Policy 7 focuses specifically on one element (CO2 emissions) and sets additional standards which are, essentially, a flexible variant of Policy ENG 1 of the East of England Plan.</p> <p>The requirement is consistent with the National Planning Policy Framework which states that:</p> <p>"[Local planning authorities] should design their policies to maximise renewable and low carbon energy development." (paragraph 97)</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 8 - Low and Zero Carbon Energy Generation</i>				
19970	Comment	<p>d) inclusion of "documented effects on health, relating to noise emission" and light pollution</p> <p>e) soil quality is not affected adversely by construction, operation OR DECOMMISSIONING OF THE DEVELOPMENT</p> <p>F) in considering development proposals which may give rise either directly, or indirectly, to serious health problems for local residents, the LPA will apply the precautionary principle.</p>	<p>The suggested addition to (e) is valid, and should be included.</p> <p>The suggested amendment to (d) and proposed point (f) are too broad to include in a policy and might best be addressed by the insertion of "and effects on public health" at the end of point (d).</p>	<p>Amend criterion e) to read '...operation or decommissioning of the development'</p> <p>Insert "and effects on public health" at the end of point (d).</p>
20193	Comment	<p>Is it necessary for all proposals for low and zero carbon energy generators to include Landscape and Visual Impact Assessments? (LVIA) For example, ground source/thermal recovery; solar panels stc. Only those proposals that have the potential to cause an adverse visual/landscape impact should be required to provide an LVIA.</p>	<p>Although the likely landscape impact from the types of development referred to could be insignificant, this would be reflected in the information required to comply with the policy. Rewording the policy to refer only to development with the potential to cause adverse visual/landscape impact would still require an assessment to determine whether it causes an adverse impact.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19991	Comment	<p>Having regard to policies contained within the draft NPPF (carried forward in the adopted NPPF), and the approach set out in the National Policy Statement for Renewable Energy Infrastructure, STOC propose the amendments to Policy 8 set out below:</p> <p>First paragraph insert "environmental, social and economic impacts are addressed satisfactorily and" after "...will be encouraged"</p> <p>Amend criterion a) to read as follows:</p> <p>"a) proposals will be required to include an environmental impact assessment which should, where appropriate, show the impact of the proposal on:</p> <ul style="list-style-type: none"> i. The landscape or the townscape, including the impact on views; ii. Heritage and cultural assets, including setting; iii. Residential amenity of nearby residents; iv. Geology, hydrogeology and hydrology; v. Ecology; vi. other economic interests, including tourism; vii. traffic and transport." <p>Include new criterion b) rewording former sub-category of criterion a) as follows:</p> <p>"b) The proposal should include an appraisal of the impact of the proposal, on the environment either in isolation or cumulatively with any other similar developments;"</p> <p>Amend (former) criterion b) to read as follows:</p> <p>"c) where appropriate the proposal should include provision for mitigation and compensation measures, such as measures to address the visual impact of the scheme, habitat enhancement or relocation."</p> <p>Amend (former) criterion d) to read as follows;</p> <p>"e) in respect of proposals for wind turbines, current standards relation to noise emission, shadow flicker and other negative effects such as interference to television transmission, airports, aircraft and</p> 	<p>The requirement for an environmental impact assessment (EIA) is governed by primary legislation and it is not possible require an EIA where it would not otherwise be required in a local policy. Although not including all the criteria listed, the proposed change agreed in response to representation 19984, incorporating text from Policy 9 d) i) and ii) will address many of the issues raised while maintaining consistency with other policies. There is no justification or evidence for requiring any arbitrary separation distance from dwellings. Each case should be considered on its merits using the evidence provided. In some instances a greater distance may be required and in others a lesser distance.</p>	See representations 19984 and 19970

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		communications, navigation and surveillance systems; and" Add paragraph at end as follows: "Large scale wind turbines will not be permitted within 2km of dwellings to protect residents from noise disturbance and visual impact. If the applicant can prove that there will be no adverse impact then a shorter distance would be considered. On no account will turbines be permitted within 1000m of a dwelling."		
19973	Comment	Policy should reflect local concerns. Clare PC submitted proposal for 2km setback from industrial sized wind turbines in rural locations as suggested by GE Turbine manufacturer	This is a contentious and highly location-specific issue.	None
20147	Comment	British Sugar's long term options include sustainable energy initiatives. Accordingly, our client is supportive Policy 8 in general terms, which encourages such provisions.	Noted	None
20070	Comment	Agree in principle with addition below:Should the need for the installation cease, operators will be required to return the land / area to its natural / original habitat and / or better"	Agreed.	See representation 19970
20182	Comment	We recommend that the impact of developments on the historic environment should be included in this as an additional category to the policy.	Agreed	See representation 19984
19984	Comment	Policy 8 refers to proposals being encouraged, whereas Policy 9 says "will be granted only where" but the references to power generation in both is confusing. Policy 8 has no reference to visibility from Conservation Areas, and merely requires the inclusion of a landscape and visual assessment, whereas Policy 9 makes much of minimising intrusion and visual impact.	The reference to "Power Generation" in Policy 9 is perhaps ambiguous as it does not explicitly exclude low and zero carbon generation (for which the overall need does not have to be demonstrated - NPPF (98)). Points made are valid.	Re-word opening of Policy 9 to read "All power generation (except low and zero carbon generation which is addressed in Policy 8)" Insert text from Policy 9 d) i) and ii)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 9 - Infrastructure Services and Telecommunication Development</i>				
20183	Comment	We welcome the reference to conservation areas in this policy. Such developments may also have a direct impact on historic fabric; for instance, proposals may come forward for installations on church towers, or in archaeologically sensitive areas. We recommend that part d) is amended to read '...in nature conservation sites, within or visible from conservation areas or affecting other heritage assets, the developer....'	Agreed	Amend Criterion d) to read "...from Conservation Areas or affecting other heritage assets, the developer can...."
20108	Comment	Policy 9 of the Preferred Options document sets out the circumstances in which "permission for infrastructure for the connection or supply of power to the National Grid" will be granted where the development is located within a nature conservation area, or within or visible from a conservation area. As worded it is unclear whether the policy is intended to relate to high voltage transmission networks as well as lower voltage distribution networks. As set out in National Policy Statement (NPS) EN-5 for Electricity Networks Infrastructure, above ground electricity lines whose nominal voltage is expected to be 132kV or above would require a DCO application. NPS EN-1 and NPS EN-5 provide the primary basis for decisions taken by the IPC on applications for electricity networks infrastructure. Therefore, given that there is already existing policy guidance for high voltage electricity network infrastructure, the 'Infrastructure Services' part of Policy 9 should be deleted, or amended to specifically refer to only distribution infrastructure for the connection or supply of power which operates below 132kV.	Policy 9 relates to all forms of development which would fall to the LPA to determine and in accordance with the advice contained within Section 5 of the NPPF.	None
20112	Comment	See attachment submitted in respect of Policy 8 in relation to Low and Zero Carbon Energy Generation. This representation has been submitted by action group Stop Turbines Over Clare and comments specifically on the policy on relation to proposed wind turbines.	This representation relates to Policy 8, not Policy 9	None
20194	Comment	No comment at the present time	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20032	Comment	<p>The county council, St Edmundsbury and Forest Heath all recognise that improving the availability of and access to High Speed Broadband is an imperative for all our authorities. Therefore, these policies should, if appropriate, contribute to that goal. Given the changes in broadband cabling specifications for new homes being made by the development and communications industries, it is not clear as to what an appropriate response from the planning system is. But given the pressing need in Suffolk, particularly in the rural areas, for improvements to the broadband network, all parts of local government should consider the ways in which they can support that goal.</p> <p>The approach being proposed by South Norfolk District Council, in their Development Management Policies, is a policy that delivers their Core Strategy requirement that all development demonstrates how it contributes to the area's broadband improvement objectives. This may be a flexible policy that could be implemented through requiring contributions toward network improvements, or imposing planning conditions to require specific ducting and cabling systems.</p> <p>The county council would also suggest that St Edmundsbury and Forest Heath reconsider sentence a) of policy 9 in relation to telecommunications development, as it appears to be in conflict with paragraph 99 of the draft NPPF, which says that 'local planning authorities should not question whether the service to be provided is needed'.</p> <p>In some parts of the county, problems have arisen where the placing of BT distribution cabinets has partially blocked footpaths and cycle paths. The county council would appreciate greater consideration being given to this issue in this policy, perhaps with requirements to consult the county council on structures affecting the highway and minimising the number of structures that reduce the width of the highway.</p>	<p>The conflict identified in paragraph 99 of the draft NPPF remains in paragraph 98 of the adopted NPPF and the policy needs to be amended accordingly. The issue relating to distribution cabinets is unlikely to be addressed by this policy as such structures are generally 'permitted development' and exempt from the requirement to obtain planning permission.</p>	<p>Reword the opening of Policy 9 to read: "All power generation (except low and zero carbon generation which is addressed in Policy 8) should be...."</p> <p>Amend Policy 8 criterion a) i) to read "Show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact."</p>
19864	Object	<p>Unclear measures for protecting biodiversity. Not inline with other policies within the document. unclear definitions</p>	<p>Although not specifically referred to in Policy 9, Policy 10 provides guidance in respect of protecting biodiversity. No information is provided to advise how the policy is not in line with other policies.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20071	Support	Fully endorse.	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4 The Natural and Historic Environment				
4.2				
19865	Object	There is no detail on how surveys and ecological reports will be assessed within the planning process. the only mention is regard will be given to advice from suffolk wildlife trust and natural england. natrual england will only provide advice where development affects a sssi or similarly desginated site. unless the suffolk wildlife trust is contracted to assess biodiversity aspects of planning applications it appears the authorities are unable to assess biodiversity impacts from plannign applications	This paragraph is providing advice on the level of information required to support a proposal. It does not prescribe how that information will be intepreted by the LPA.	None
<i>Policy 10 - Impact of Development on Sites of Biodiversity and Geodiversity Importance</i>				
20072	Comment	Without Prejustice "agreement"	Noted	None
19930	Comment	Broadly agree	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20195	Comment	<p>The LPA should have regard to the expertise provided by developers/promoters to support planning applications, not just the expertise of Natural England and Suffolk Wildlife Trust. Elements of the policy will need to be reassessed in light of the publication of the NPPF.</p> <p>Also, if the policy is to remain it needs to be considered on the basis of proposals having a "significant" adverse impact on designated sites, not just an adverse impact.</p> <p>The role of mitigation compensatory measures needs to be taken into account of in the policy. For instance to provide alternative habitat where there is an unavoidable impact on locally designated sites.</p> <p>The application of the precautionary principle will need to take account the current review being undertaken by DEFRA on the implementation of the EU Habitats and Wild Birds Directive in England. In particular, how Local Authorities are to interpret the precautionary principle, and the impact of case law.</p>	<p>There will still be role for the expertise provided by developers/promoters in addition to Natural England and Suffolk Wildlife Trust.</p> <p>The addition of the word 'significant' will not improve clarity, but could lead to ambiguity over the definition of what is significant. It is the effect of any adverse impact and the potential for mitigation which is of importance.</p> <p>Mitigation is considered further at Policy 12.</p> <p>It is acknowledged that the review published on 22 March 2012 is recommending a move away from the precautionary principle to a more risk based approach. However, until further guidance is published the precautionary principle remains appropriate.</p>	None
20103	Comment	<p>This representation relates to sections 14.1 - 14.4 and 14.8 - 14.9. Introduce policy relating to special character areas.</p>	<p>This representation relates to sections of the Bury St Edmunds Vision 2031 Document, but is proposing the addition of an additional policy in this document relating to Residential Areas of Special Character. Given that the identification of such areas would come from Area Action Plans, it is considered that Policy 1 of this Document would recognise any such area and an additional policy would be superfluous.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20235	Comment	Policy 10 relates to development on and in proximity to sites of biodiversity and geodiversity importance. The policy identifies a presumption against development unless the need for the development outweighs the importance of the given asset. This does not take into account that some forms of development result in the creation of wildlife habitats such as Lafarge's operations at Higham. Where such instances occur the given habitat can then be easily translocated in accordance with an appropriate scheme. The caveat at the end of the policy should recognise this scenario, consistent with Para 13 of PPS9.	It is acknowledged that some forms of development may create new wildlife habitats and this is a matter which can be taken into account. This is addressed at criterion e). However, there remains a requirement to assess the nature and importance of the existing habitat which would be lost.	None
20171	Comment	We are also in favour of Preferred Policy 10. The protection of water resources (ground and surface) from pollution is an important environmental issue in the Forest Heath District. This is particularly due to the number of ecologically designated sites and also to the number of groundwater source abstractions and their groundwater source protection zones.	Noted	None
20141	Comment	We query how the "need" for development which will adversely impact on a site of biodiversity importance will be judged? We suggest that the policy reflects the emerging National Planning Policy Framework which suggests that "if significant harm from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission should be refused".	Policy 10 needs to be considered in conjunction with Policy 2 of the respective Core Strategies and paragraph 118 of the NPPF. It is against this background that the assessment of need will be made.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20086	Comment	The Woodland Trust appreciates the inclusion of "ancient and semi natural woodland and veteran trees" in Section 4 The Natural and Historic Environment, Page 28, paragraph 4.5. However, the corresponding Policy (Policy 10) only refers to "nature conservation sites or interests" and states that "local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources". Whilst we appreciate that the Woodland Trust may be considered a "specialist source" we consider the term "regard", with particular reference to ancient woodland, to be weak. We would like to see greater protection afford to ancient woodland due to it's specific unique value on biodiversity, cultural and historic grounds.	The LPA cannot delegate its decision making function to another body, so the term 'regard' is appropriate, particularly when read in conjunction with the remainder of the policy.	None
19907	Comment	Biodiversity Policy 10 - the policy approach is one of addressing the exceptions that can result in development having an adverse impact on nature conservation sites, rather than stating that such species/areas will be protected in the first instance. The phrasing of this and other policies in section 4 could be reviewed and more positive wording potentially used, to afford species and areas of biodiversity value/interest appropriate levels of protection. By this we mean emphasising early in the policy what will be permitted and then later on discussing what could happen if an adverse effect is identified. The Councils may wish to look at the wording of Breckland Councils' Adopted Core Strategy policies DC12 and CP10.	The protection sought in Section 4 and Policy 10 in particular is already in place in Policy CS2 of the respective Core Strategies. The policies referred to in the Breckland Core Strategy combine both Core Strategy and Development Management Policies.	None
19867	Comment	We fully support Policy 10. With respect to Local Geodiversity Sites, please note that GeoSuffolk has registered a number of County Geodiversity Sites (CGS) with the Suffolk Biological Records Centre. These are in addition to the Suffolk RIGS.	Noted	None
20116	Comment	Natural England supports policies 10 (Impact of Development on Sites of Biodiversity and Geodiversity Importance), 11 (Protected Species), 12 (Protection, Mitigation and Enhancement of Biodiversity), and 13 (Landscape Features).	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19994	Object	Whilst I do not have any problem with the principle of this policy, I think the test of 'adverse impact' is too strict since any impact, however minor, could be used to prevent development. I would suggest a minor change to 'material adverse impact' in the two paragraphs following (g).	The addition of the word 'material' will not improve clarity, but could lead to ambiguity over the definition of what is material. It is the effect of any adverse impact and the potential for mitigation which is of importance.	None
<hr/>				
4.6				
19931	Support	support... and hope this will be the case as far as Calford Green is concerned	Noted	None
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<i>Policy 11 - Protected Species</i>				
19983	Comment	In the first paragraph of this policy we would like to suggest that the policy is amended by adding in the words shown in italics and underlined below to read; Will not be permitted unless there is no alternative and that there is no overall negative impact to the protected species and the Local planning Authority	The protection being sought is already in place in the form of the criteria which need to be met.	None
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20135	Comment	it is suggested that the first paragraph be amended by including, after "will not be permitted unless there is no alternative", and that there is no overall negative impact to the protected species	The protection being sought is already in place in the form of the criteria which need to be met.	None
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20196	Comment	Policy 11 appears to repeat the requirement of the various wildlife and related Acts quoted. The need for this policy needs to be reassessed in light of the NPPF's publication.	The policy is fully compliant with paragraph 113 of the NPPF which advises LPAs to set criteria based policies against which proposals for development on or affecting wildlife will be judged. It is not inappropriate for a planning policy to cross reference with other legislation.	None
<hr/>				
19995	Object	This is the same point as in Policy 10 in that the policy refers to 'adverse impact', whereas it should be 'material adverse impact'.	The addition of the word 'material' will not improve clarity, but could lead to ambiguity over the definition of what is material. It is the effect of any adverse impact and the potential for mitigation which is of importance.	None
<hr/>				

Representations

Nature Summary of Main Issue

Council's Assessment

Action

Policy 12 - Protection, Mitigation and Enhancement of Biodiversity

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19912	Comment	<p>The Development Management document does not include any reference to Environmental Quality - which can be found in the St Eds Local Plan (and which includes policy NE5). So I am suggesting that this is added to the DM policy document.</p> <p>From Local Plan: Environmental Quality 1. Paragraph 10.20 leave as it is (but amended to refer to both St Eds and FH); 2. New paragraph 10.21: * Air quality and light pollution are two issues which have received growing attention in recent years. Councils are required to carry out review and assessments of air quality within their areas to determine the likelihood of any exceedences of the Government's objectives in respect of certain prescribed pollutants. Supplementary Planning Guidance on Air Quality and New Development, adopted by both Councils, ensures that planning applications properly take account of the impacts of new development on existing air quality, and requires the provision of mitigation measures where there may be an adverse impact. The use and power of outdoor lights has increased considerably in recent years, which has resulted in the artificial lighting of the night sky ('skyglow'). Planning Guidance on lighting will be prepared and developers will be expected to comply with its advice. 3. Paragraph 10.22 (noise) to remain the same - (but amended to refer to both St Eds and FH); 4. Paragraph 10.23 to remain the same - (but amended to refer to both St Eds and FH); 5. Policy NE5: Environmental Quality Include in this policy the following (suggest after the third paragraph on noise): 'Development will not normally be permitted where it is likely to result in an exceedence of the Government's Air Quality</p>	<p>This response relates to the addition of a new policy and explanatory paragraphs rather than to Policy 12 and requires separate considerations.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		Objectives. Developers are expected to comply with the requirements of the Supplementary Planning Guidance on Air		
20236	Comment	Policy 12 seeks to provide for an element of mitigation and enhancement. The Council have adopted an arbitrary approach to provide a trigger mechanism for the inclusion of biodiversity measures. We would consider that this policy needs to take better account of geographical context and the actual nature of the proposals. The policy as written appears to be too generic and cannot be effectively enforced.	The trigger mechanism has been removed in response to representation 20143. Consideration of the geographical context and the actual nature of the proposal will be a key element of the consideration of any proposal.	None
20143	Comment	We object to policy 12 as currently worded. Measures to protect biodiversity and mitigate any harm which may result should be a part of all developments, not just those of more than 10 dwellings or 1,000m ² of non-residential floorspace. We suggest that policy 12 is worded as follows: "In addition to, or as part of the requirements of other policies in this DPD, measures should be included as necessary in the design of all developments for the protection of biodiversity and the mitigation of any adverse impacts. Additionally, enhancement for biodiversity should be included in all proposals, commensurate to the scale of the development. For example such enhancement could include habitat creation, wildlife links and building design which creates wildlife habitat (e.g. green roofs, bird and/or bat boxes)".	Agreed, subject to the retention of the words "and where appropriate".	Amend policy to read: In addition to, or as part of the requirements of other policies in this DPD, measures should be included as necessary and where appropriate in the design of all developments for the protection of biodiversity and the mitigation of any adverse impacts. Additionally, enhancement for biodiversity should be included in all proposals, commensurate with the scale of the development. For example such enhancement could include habitat creation, wildlife links and building design which creates wildlife habitat (e.g. green roofs, bird and/or bat boxes).
20153	Comment	This policy lacks flexibility. These measures should "be encouraged" where appropriate. The policy goes beyond mitigation measures which are fairly and reasonably related to all developments.	See response to representation 20143. The revised wording retains the wording "where appropriate". This should ensure that the requirements are both fairly and reasonably related to the development proposed.	None
20197	Comment	Policy 12 needs to have the test of financial viability and technical feasibility included if it is to remain.	See response to representations 20143 and 20153. The wording includes "where appropriate". Any financial implications can be considered on a case by case basis.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>4.8</i>				
19932	Support	The character of Calford Green will be lost if it merged with Haverhill	Noted, this matter is addressed in the adopted St Edmundsbury Core Strategy	None
<i>Policy 13 - Landscape Features</i>				
19933	Comment	The coalescence of Haverhill (or near coalescence) with Calford Green would make it difficult to accord with the main thrust of this policy. The Core Document has stated 'there will be no coalescence'	This matter is being addressed through the Haverhill Vision 2031 document.	None
20154	Comment	It is too broad brush to require that all "Gaps between settlements and their settings and the nocturnal character of the landscape, must be maintained." Sites need to be judged on their individual merits and as such this section of the policy needs to be revised substantially or deleted accordingly. Clarification is also sought as to the need to ensure that "there is no net loss of characteristic features" in regard to a development proposal. If there are compelling benefits to a proposal then it should be supported without such prerequisites. Such a requirement should be an aspiration and not something which stops development being permitted as suggested in the last line of the policy - "Where this is not possible development will not be permitted". This last sentence does not contain any flexibility which is contrary to the thrust of national planning policy in PPS12 and the NPPF.	Disagree that protection of gaps between settlement is too broad brush. This is an essential feature of the Suffolk landscape and is supported by paragraph 125 of the NPPF. Acknowledge that final sentence is absolute and inflexible. Inclusion of the word 'normally' should provide flexibility for any exception.	Amend final sentence to read "...will not normally be permitted."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20198	Comment	<p>Elements of the policy, such as wildlife and amenity are covered in other policies and do not need to be repeated. The identification of locally designated sensitive sites needs to be reassessed in light of the published NPPF. Previous national guidance suggested that local landscape designations should not be promoted.</p> <p>Other elements of the policy are onerous. For instance, to require all development to be "informed by, and be sympathetic to, the character of the landscape" is unnecessary. As an example, it seems unnecessary for a proposal for a change of use in an existing built up areas/towns, to be judged against landscape character.</p>	<p>The NPPF does not advise against local landscape designations and includes them as a consideration in criteria based policies for development (paragraph 113).</p> <p>Although the policy does refer to all development proposals, the information required will be proportionate to the likely impact. Accordingly, a change of use in a built up area may have little or no impact and therefore, require little assessment. However, even in exiting built up areas, development can still have an impact on the landscape and should not be exempt from consideration.</p>	None
20128	Comment	<p>The wording in the fourth paragraph refers to "the nocturnal character of the landscape". The reader would benefit from a fuller explanation of what is meant by "nocturnal character" in order that it can be properly applied and understood.</p>	<p>Noted. The addition of a further sentence at the end of paragraph 4.9 should assist in understanding.</p>	<p>Add at end of paragraph 4.9 'This includes not only the physical retention of such features, but also their protection from impacts such as light spillage.'</p>
19871	Comment	<p>First paragraph should make reference to historic landscape features.</p> <p>5th para. A visual impact assesement should be submitted where development proposals have the potential to significantly impact, positively or negatively, the landscape charater.</p>	<p>As currently worded the policy includes all landscape features including 'historic' features. The addition of 'historic' would not add anything further.</p> <p>There may well be circumstances where a visual impact assessment is necessary in order to assess the impact of proposed development and this would be covered by the information required to meet the paragraph 4.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20033	Comment	<p>The county council would like to make some suggestions relating to this policy, which would make the policy stronger in ensuring suitable mitigation of landscape impacts.</p> <p>- The paragraph beginning 'Where the harm..' should be rephrased to read:</p> <p>'Where the other benefits of the development are considered to significantly and demonstrably outweigh the risk or detriment to the character or condition of the landscape, the development will be permitted by the Authority subject to other planning considerations'</p> <p>- The penultimate paragraph should be rephrased as:</p> <p>'However, in these cases it is essential that commensurate provision should be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features'.</p> <p>- The second paragraph should also be modified, to refer to 'Special Landscape Areas' (as per the proposal maps), rather than 'Areas of particular landscape sensitivity'.</p>	<p>The suggested changes to paragraphs 6 and 7 will strengthen the policy. The suggested change to paragraph 2 would have the impact of making the policy exclusive, whereas at present it is inclusive. An alternative would be to include Special Landscape Areas within the inclusive definition.</p>	<p>Amend paragraph 2 to read "Areas of particular landscape sensitivity including Special Landscape Areas....."</p> <p>Amend Paragraph 6 to read "Where the other benefits of the development are considered to significantly and demonstrably outweigh the risk or detriment to the character or condition of the landscape, the development will be permitted by the Authority subject to other planning considerations"</p> <p>Amend Paragraph 7 to read "However, in these cases it is essential that commensurate provision should be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features."</p>
20019	Comment	<p>The LDF was spacially based and should not drop the spacial planning objectives for the rural aeas. Amenity Areas designations within settlement boundaries should continue to be protected against development. It is not clear that the planning policies within the development management document is adequate to do this, particularly areas which are of primarily visual importance but are not used for recreation.</p>	<p>This concern is addressed by Policy 1.</p>	<p>None</p>
20073	Object	<p>A "firm definition required" of unacceptable and from whom / which party(s) .</p>	<p>This is a subjective judgement which will be made by the LPA in consultation with all interested parties.</p>	<p>None</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4.12 19934	Comment	New development will create significant light pollution for Calford Green	This is an issue which will need to be addressed with any new development in accordance with this policy.	None

Policy 14 - Safeguarding from Hazards

20155	Comment	<p>Part c is regarded as too inflexible because "a full assessment of risk levels" and remediation is required prior to or as part of any planning application. At present minor applications in Suffolk often have to include a simple contamination form. Large applications often a Phase 1 Contamination Assessment. These Phase 1 Assessments often recommend further work, for example, if there is any history of ground disturbance or for very minor contamination such as bonfire ash. In the vast majority of cases some "potential"contamination is identified but the risk is minimal and can be dealt with adequately by planning condition.</p> <p>The policy as worded could require unnecessary and very costly intrusive contamination surveys by requiring a "full assessment of the risk levels." On large and small sites this will add massively to the cost and therefore the risk of preparing planning applications without providing any tangible public benefit. Appropriate amendments are required so as to ensure that this policy does not unintentionally frustrate the delivery of sites, particularly given the current economic climate.</p>	<p>The wording of the policy does not depart from the current situation. The information required is proportionate to the development proposed or the known or perceived hazard. It is still necessary to undertake a full assessment prior to the determination of a planning application. Planning conditions will usually then be used to ensure appropriate remediation.</p> <p>Rather than imposing an additional burden on landowners/developers, it will highlight potential problems and costs at an early stage of the development process.</p>	None
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20099	Comment	<p>Although we agree with the basic principal of the policy, rewording and additions to the text within the document are necessary in order for it to accord with our local technical guidance notes and national best practice. Therefore we wish for the section and policy to be amended to the following:</p> <p>Policy 14 Safeguarding from Hazards Development will not be permitted where there is an unacceptable risk: a) due to siting on known or suspected unstable land; b) due to siting on land which is known to be or potentially affected by contamination or where the land may have a particular sensitive end use; or c) due to the storage or use of hazardous substances.</p> <p>Proposals for development on or adjacent to land which is known to be or potentially affected by contamination; or land which may have a particular sensitive end use; or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels, site investigations and other relevant studies, and remediation proposals and implementation schedule prior to or as part of any planning application.</p> <p>In appropriate cases, the Local Planning Authority may impose planning conditions or through a legal obligation secure remedial works and/or monitoring processes. Proposals for such developments will be permitted only where proposals accord with adopted policy/guidance.</p>	<p>With the exception of the final sentence, the suggested changes make a positive contribution to the policy. The final sentence is not a necessary addition.</p>	<p>Category b) be amended to read "due to siting on land which is known to be or potentially affected by contamination or where the land may have a particular sensitive end use;"</p> <p>The penultimate paragraph be amended to read "Proposals for development on or adjacent to land which is known to be or potentially affected by contamination; or land which may have a particular sensitive end use; or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels, site investigations and other relevant studies, and remediation proposals and implementation schedule prior to or as part of any planning application."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20136	Comment	The policy does not go far enough to include sites that may be adjoining sites that are hazardous. The PC would like to request that the same protection and precautions are offered to those sites that may be adjacent to as well as those sites that are considered hazardous.	The penultimate paragraph includes sites which are adjacent to sites which are hazardous. See also response to representation 20099 which extends the protection to sensitive end users.	None
20199	Comment	Policy 14 should allow for mitigation measures to be taken account of. The policy as written is also vague and imprecise. For instance, it may be appropriate to allow for development where there is a risk (due to the storage or use of hazardous substances). For instance, development in association with the storage or use of hazardous substances.	The aim of the policy is to protect members of the public from hazards. It does not preclude the forms of development referred to, where there is a risk, but it does require a full assessment of that risk.	None
<i>4.15</i>				
19935	Comment	The 5 listed buildings in Calford Green are a joy because of their setting. It is important that proposals will not detract from those settings	Noted	None
<i>Policy 15 - Listed Buildings</i>				
20200	Comment	The Policy's requirement will need to be reassessed in light of the NPPF. There will be no need to repeat national policy	Noted	Check for full compliance with NPPF
<i>Policy 16 - Buildings of Local Architectural or Historic Significance or Protected by an Article 4 Direction</i>				
20201	Comment	This policy will need to be reassessed in light of the publication of the NPPF. It is inappropriate to apply an extra layer of protection on "locally" listed buildings. "Local" lists have no statutory basis.	There is no conflict with Section 12 of the NPPF and paragraph 135 of the NPPF makes specific reference to assessing the impact of proposals on non-designated heritage assets in the determination of planning applications.	None
20074	Support	Agree Policy.	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 17 - Conservation Areas</i>				
19974	Comment	Who defines the local distinctiveness and where are the references to the specific characteristics of a given locality to be found? Bricks, fenestration, paving, acceptable colours?	Each Conservation Area has an appraisal which identifies these features. Each appraisal is subject to public scrutiny.	None
20202	Comment	The policy will need to be reassessed in the light of the publication of the NPPF. There will not be a need to repeat national policy. It is inappropriate to apply additional protection to "locally" listed buildings. "Local" lists have no statutory basis.	See response to representation 2021 submitted in respect of Policy 16.	None
20062	Comment	We believe a dual entry/cross reference may be needed in this DPD [a new policy number perhaps] and Item 14.19 of Bury Vision 2031 relating to Residential Areas of Special Character. This seems to be the process being adopted for other Councils. Whilst not of sufficient historical/architectural value to warrant conservation status, there should be development guidelines to maintain low residential density levels, plot sizes/ratios and spaces between buildings similar to that existing in the area. Protection is needed for landscaping/trees/bushes and building lines to prevent access roads being driven through to create backland development. See our Petition, Item 1.	This representation relates to sections of the Bury St Edmunds Vision 2031 Document, but is proposing the addition of an additional policy in this document relating to Residential Areas of Special Character. Given that the identification of such areas would come from Area Action Plans, it is considered that Policy 1 of this Document would recognise any such area and an additional policy would be superfluous.	None
20012	Object	Criterion a) does not accord with the legal provisions which require that the development preserves or enhances the character or appearance. It's difficult to see how development outside a conservation area can enhance the appearance of that conservation area - which is what the policy requires as drafted. To meet legal requirements it is sufficient that the development preserves the appearance of the Conservation Area. Approach is not consistent with National Policy and is unnecessary as it is already covered by a statutory duty. If policy remains "character and appearance" in criterion a) should be replaced by "character or appearance".	Disagree - developments adjacent to, but outside or visible from a Conservation Area can have a significant impact. Agree that criterion a) should be replaced by "character or appearance".	Change criterion a) to read "character or appearance".

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 18 - New Uses for Historic Buildings</i>				
20203	Comment	It is inappropriate to apply additional protection to locally described "historic buildings" (i.e. properties with no statutory listing). Such properties should be assessed in the same way as other buildings.	Although this policy is intended to primarily protect buildings which would be defined as designated heritage assets, paragraph 135 of the NPPF does extend consideration to non-designated heritage assets.	None
20075	Comment	Agee in principle.	Noted	None
<i>4.23</i>				
19971	Comment	Development affecting Parks, Gardens AND COMMONS of Specific Historic or Design Interest Include reference to " Commons" in following paragraphs as well	This policy relates specifically to parks and gardens included within the English Heritage Register of Parks and Gardens. Commons are not part of this register.	Noted
<i>Policy 19 - Development Affecting Parks and Gardens of Special Historic or Design Interest</i>				
20204	Comment	No comments at this time.	Noted	None
<i>Policy 20 - Archaeology</i>				
20205	Comment	This policy will need to be reassessed in the light of the NPPF.	Noted	Check for conformity with NPPF
20156	Comment	The preamble to this policy states that "the known sites are considered to be only a small proportion of the total archaeological remains, due to the lack of systematic investigation across the West Suffolk area". The policy states that sites of "potential archaeological importance" are to be the subject, in a number of ways, of assessment. There should be more clarity in the policy and supporting text how potential sites of archaeological importance will be identified.	Noted - Additional supporting information would assist.	Add at end of paragraph 4.25: "A full inventory of all known heritage assets is maintained by Suffolk County Council's Archaeological Service. Policy 20 applies to all archaeological sites and areas of high archaeological potential."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19911 20034	Comment	<p>The county council welcomes the section relating to archaeology, and is pleased to see that the majority of our earlier, informal comments have been taken up. In particular, we are pleased to see reference made in paragraph 4.25 to the fact that known sites are only a small proportion of total remains yet to be discovered.</p> <p>However, we do have some suggestions on the wording of Policy 20, which we have outlined in our full representation. We believe that this will make the policy more robust still.</p>	The recommended changes should make the policy more robust.	<p>In second paragraph change 'importance ' to 'interest'.</p> <p>In criterion a) amend to read 'an appropriate desk based assessment and/or field evaluation of the archaeological interest or significance prior to determination.'</p>
<i>Policy 21 - Enabling Development</i>				
20184	Comment	With regard to policy 21, covering enabling development, English Heritage normally advises that this topic is not appropriate for local plan policy, quite simply because such developments will only be justified by exceptional circumstances. By including a policy it is possible that there could be perverse incentives to allow heritage assets to fall into disrepair. Any enabling development proposal will, by definition, be justified on its own merits, as a unique set of circumstances.	Disagree. The NPPF is clear at paragraph 140 that LPA's should assess proposals for enabling development. It is appropriate, therefore, that the LPA has a policy to provide appropriate guidance. Criteria c) and g) should avoid any incentive to allow a heritage asset to deliberately fall into disrepair. Reference is also made to the English Heritage guidance at paragraph 4.27.	None
20206	Comment	No comment at this time	Noted	None
19945	Object	Policy 21 should be relaxed by deleting criteria (c) with its need to prove that the enabling development is "the minimum necessary".	Criterion c) is necessary given the exceptional circumstances required to justify development which would not otherwise be permitted.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
5 Housing and Homes				
5.1				
20083	Object	Please see attachment. This representation relates to chapter 5.	The document is to be read as a suite of policies covering all prospective development proposals. Within this context it is considered satisfactory.	No change proposed to text.
20090	Object	Please see attachment. This representation relates to chapter 5 and John Pophams comments.	The document is to be read as a suite of policies covering all prospective development proposals. Within this context it is considered satisfactory.	No change to policy proposed.
19839	Object	This paragraph suggests that Local Service Centres will be part of the focus for major new development. This is inconsistent with paragraph 4.54 of the St Edmundsbury Core Strategy, which states that "Key Service Centres will be the main focus for additional homes, jobs and community facilities outside of Bury St Edmunds and Haverhill" and paragraph 4.56 which says that in Local Service Centres "some small scale housing and employment development will be encouraged." To conform with the Core Strategy, the reference to Local Service Centres must be removed from paragraph 5.1	Comments noted and accepted. As worded, the para. is at odds with the provisions of the adopted Core Strategy and amendment is required.	Amend the final sentence of Para. 5.1 to read as follows - 'The focus for major new development will be the larger towns and Key Service Centres'.
Policy 22 - Building for Life				
20035	Comment	The county council supports the intention to achieve better public health outcomes through requiring the Building for Life Standard, though we believe that Building for Life does not go far enough in supporting the housing needs of older people.	It is acknowledged that Policy 22 on its own may not address all the needs of older people, but it would complement other policies when used in conjunction with Policies 23 and 24.	None
20175	Comment	It is considered that this policy and its requirement that developments of 20+ dwellings will need to meet the Building for Life Silver Standard is running in advance of National Planning Policy	The NPPF promotes good design as being indivisible from good planning. It is clear therefore that within national policy the importance of good design is highlighted. The Building for Life standards seek to achieve this and does not therefore run ahead of policy.	No change proposed to policy as a direct result of this representation, albeit it is accepted, in response to other representations, that the policy requires some amendment.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20129	Comment	The minimum BFL standard is considered to go beyond reasonable expectation and is therefore objected to. This will only serve to make development unviable, thereby reducing development.	Comments noted and accepted. Changes proposed to policy.	See response to representation 20175.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20207	Comment	The policy is a burden upon the viability of proposals and does not make it clear how outline applications are assessed.	It is accepted, on reflection, that the policy is not fit for purpose as drafted, is overambitious, and potentially difficult to interpret. Nonetheless, the importance of good design remains a key element within the NPPF and a re-drafted residential design policy is proposed in order to provide greater guidance to developers and to the authorities in seeking to assess the design acceptability of residential development proposals.	<p>Amend supporting text and policy as follows -</p> <p>'Residential Design</p> <p>5.3 'Good quality housing design can improve social wellbeing and quality of life by reducing crime, improving public health, easing transport problems and increasing property values' Commission for Architecture and the Built Environment, (CABE), 2008.</p> <p>5.4 The NPPF makes it clear that 'good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings'.</p> <p>5.5 The detail within this policy should be read as well as, and in conjunction with, other policies in this DPD.</p> <p>Policy 22 - Residential Design</p> <p>All residential development proposals should maintain or create a sense of place and / or character by:</p> <p>a) employing designs that are specific to the scheme, and which respond intelligently and appropriately to a clear brief articulated in a Design and Access Statement.</p> <p>b) basing design on an analysis of existing buildings, landscape or topography, and fully exploiting the opportunities that these present.</p> <p>c) utilising the characteristics of the locality to create buildings and spaces that have a strong sense of place and distinctiveness.</p> <p>d) creating or contributing to a coherent and legible place that is structured and articulated so that it is visually interesting and welcoming.</p> <p>e) creating and supporting continuity of built form and enclosure of spaces.</p> <p>Residential development should be laid out to</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				<p>optimise amenity with streets and parking facilitating this primary objective. Therefore, in addition to the criteria above, development should:</p> <p>f) avoid the dominance of highways and parking, and the rigid application of engineering geometry to meet highways design standards.</p> <p>g) take opportunities for parking to support the street scene.</p> <p>h) consider the needs of pedestrians and cyclists before car users.</p> <p>i) integrate comfortably with surrounding street networks.</p> <p>j) seek to create a safe and welcoming environment.</p> <p>New dwellings should also be of a high architectural quality, meaning that:</p> <p>k) they are fit for purpose and function well, providing adequate space, light and privacy.</p> <p>l) They are adaptable in terms of lifetime changes and use.</p> <p>m) They are well built and physically durable.</p> <p>n) They are the product of coherent and appropriate design principles.'</p>
20157	Comment	BFL should not be an absolute requirement in schemes and there have only be a small number of awards due to its aspirational nature.	Comments noted and accepted. Changes made to policy.	See changes proposed in response to representation 20175
20240	Object	Policy 22 states that all development of more than 20 dwellings will normally be required to meet the Building for Life Silver Standard. Whilst Bellway support the aims of Building for Life, it is a subjective design assessment, often only possible to be undertaken at the completion of a project and is not therefore appropriate as a planning policy requirement. In our view the policy should be deleted.	Noted, and accepted. See comments made in relation to this policy in response to 20207	See representation 20207

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20013	Object	<p>Not appropriate to in effect delegate decisions to a standard produced by another body which could change outside of the Council's control.</p> <p>The criteria:</p> <ul style="list-style-type: none"> - are not always equally important and there is no weighting in the standard - have not been subject to testing and scrutiny through the DPD process. - against which development will be judged should set out in the plan <p>Criteria can be contradictory.</p> <p>If a scheme is judged good enough to approve against general policies of plan, there is no need for it to also be considered against the subjective criteria in the Building for Life Standards.</p>	<p>The Building for Life standard is a robust tool for considering a set of subjective design criteria in as objective a way as is possible. Reference to national standards does not necessarily conflict with advice in the NPPF, where it is specifically advocated in respect of policies for low a low carbon future.</p> <p>However, see wider comments and changes proposed in response to representation 20207</p>	See changes made in response to 20207.
<i>Policy 23 - Special Housing Needs</i>				
20036	Comment	<p>Given the pressing need for suitable housing to meet the challenge of our ageing population (set out in the Appendix to our covering letter), the county council has been working with registered providers and Suffolk's district and borough councils to ensure the availability of a range of housing options for older people, throughout Suffolk.</p> <p>In making the following comments on Policy 23, the county council hopes to achieve the modification of policies to give strong encouragement and support to the development of a wide range of older and vulnerable people's housing.</p>	Agree.	<p>Rephrase first line to read; 'Proposals for new or extensions to existing specialist accommodation for elderly and vulnerable people will....'</p> <p>Replace the word 'acceptable' in the first and last sentences with 'supported'.</p> <p>Rephrase criterion c) to read; 'the location of the development is well served by, public transport, community and retail facilities; and...'</p>
20176	Comment	<p>Policy not consistent with PPS1 which seeks to create fully inclusive communities. The policy is unduly restrictive as it does not permit elderly persons' accommodation in smaller village settlements and would therefore limit the possibility of achieving a mix of housing stock.</p>	<p>Comments noted and partially agreed with. It is accepted that some residential development is acceptable within the lower order settlements, and that, therefore, special needs housing ought to also be so acceptable in these settlements. It is not accepted that more rural locations should accommodate special needs housing where they would not be appropriate for residential development but some change to the policy is justified.</p>	Amend the policy - delete 'within the towns, Key Service Centres and Local Service Centres / Primary villages'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20208	Comment	No Comment from Bidwell	'No comment' position noted	No change to policy
<i>5.7</i>				
19878	Support	The word "practise" in the first line should be practice.	Agree	Change 'practise' to 'practice'.
<i>Policy 24 - Alterations or Extensions to Dwellings, including Self Contained Annexes and Development within the Curtilage</i>				
20209	Comment	No Comment from Bidwells	'No comment' position noted	No change to policy
19938	Comment	As the ward member for Southgate in St Eds, I have been contacted by a group of 107 members of the Home Farm Lane and Hardwick Park Residents Association, who would like to see the word "density" inserted in point a, so it reads "respect the character, density, scale and design of existing dwellings, and the character and appearance of the immediate and surrounding area". I fully support this comment and would like to see the addition of the word to the policy.	As the policy relates to extensions and annexes and not the creation of new residential dwellings, it has no impact on density. For this reason, it is character scale and design which is most important.	None
<i>Policy 25 - Extensions to Domestic Gardens in the Countryside</i>				
20210	Comment	No Comment from Bidwells	'No comment' position noted	No change to policy
20117	Comment	Suggests that a further criterion should be added to state that there should be no significant effects upon biodiversity or geodiversity	It is not considered necessary to widen the scope of this policy to cover biodiversity and geodiversity interests since these are protected by policy 10. The document is to be read as a suite of documents.	No change to policy proposed.
<i>Policy 26 - Agricultural and Essential Workers Dwelling</i>				
20211	Comment	No Comment from Bidwells	'No comment' position noted	no change to policy
19879	Support	In the penultimate paragraph, first line, additional should be changed to addition. In the last line of the last paragraph the "s" should be deleted from reflects.	Agree	In penultimate paragraph change 'additional' to 'addition'. In last line of last paragraph, delete 's' from 'reflects'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>policy 27 - Residential use of Redundant Rural Buildings in the Countryside</i>				
20212	Comment	No Comment from Bidwells	'No comment' position noted	No change to policy
20177	Comment	Consider that the policy is unduly restrictive.	<p>Comments are noted. PPS4 has been replaced by the NPPF, and it is noted that the NPPF (para. 55) supports the re-use of redundant or disused buildings in rural areas for residential development providing that it would lead to an enhancement of the existing setting. Within this context it is accepted that the policy as worded is unduly restrictive and needs to better reflect the NPPF position. Principally, it is accepted that criterion A and B and in particular restrictive and do not reflect the more permissive stance of the NPPF. These will need to be removed from the policy and it will also need to be tweaked to reflect the need to lead to an enhancement of the immediate setting. Final para. wil need amending however to ensure that any resi re-use is genuinely sustainable in terms of its location for example</p> <p>In changing this policy consequential amendment will also be required to policy 31 to reflect, under additional criterion V) the possibility of residential re-use in accord with policy 27.</p>	<p>Amend policy as follows -</p> <p>Remove criterion A and B. Reword criterion E as follows -</p> <p>'the proposal would lead to an enhancement to the immediate setting of the building and the creation of a residential curtilage and any associated domestic paraphernalia would not have a harmful effect on the character of the site or setting of the building, any wider group of buildings, or the surrounding area.'</p> <p>add ', perhaps due to their unsuitable or unsustainable location or to the condition or appearance of the structure' after 'new uses' in the final paragraph.</p>
20158	Comment	Flexibility is required in regard to the re-use of buildings in the countryside. A criteria rather than a prescriptive approach would therefore be more appropriate and would allow for greater innovation in the re-use of such buildings. As long as the principles of sustainable development are appropriately respected then the prospect of these buildings making a significant contribution to the rural economy and its quality of life would be enhanced.	It is agreed that flexibility is required in the re-use of buildings in the countryside given the wording of the NPPF and it is considered that the changes agreed in response to representation 20177 respond to such a requirement. It is considered that the policy as re-drafted respects the principles of sustainable development.	No further change to policy, over and above those made in response to representation 20177.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20058	Object	Policy 27 has been drafted so as to allow only buildings in the countryside which are of architectural or historic merit to be reused. This policy must be flexible enough to respond to other equally, and sometimes more important, planning concerns, such as the need for development to be sustainable. The policy does not consider, for instance, how the reuse of buildings can be a far more sustainable form of development than new greenfield development. Clause b should be deleted, as should the word 'rural' in the Policy's first line.	<p>Disagree with the removal of criterion b), there would be too many opportunities for abuse, particularly for modern buildings which may be redundant for their original purpose. If there is a need for homes in a rural area covered by other policies, this policy does not preclude it from being achieved through conversion rather than new build.</p> <p>Agree with the removal the eord 'rural' in the first line as it serves no purpose.</p>	Remove the word 'rural' from the first line.

Policy 28 - Appropriate Employment Uses and Protection of Employment Land and Existing Businesses

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
6 Sustainable Economic and Tourism Development				
Policy 28 - Appropriate Employment Uses and Protection of Employment Land and Existing Businesses				
20213	Comment	Elements of this policy are onerous. The policy should be simplified and relate to whether the continued use of land for employment use is financially viable, appropriate (in terms of amenity) or whether an alternative use would achieve more sustainability objectives.	<p>The policy does relate to whether or not any continued use of land for employment purposes is viable (criterion B) and also does relate to whether the existing use is not appropriate (criterion C).</p> <p>The prospect of an alternative use achieving greater sustainability objectives is considered reasonable, subject to the benefit outweighing the loss of the site for employment purposes, and compliant with the NPPF. The policy is proposed to be amended to reflect this.</p>	<p>Add criterion F - 'An alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site'.</p> <p>remove word 'only' from first line.</p> <p>Add - 'where relevant and' before 'in addition to other policies in the Plan'</p>
20145	Comment	<p>Policy 28 concerns proposals on existing employment sites, and is drafted in such a way that any development, including employment uses (to include B-class uses) will be subject to a series of tests where the proposed use is expected to have an adverse effect on "employment generation". It is evident from a review of the relevant tests stated in this policy that these are intended to be applied to proposals for non-employment uses on employment sites. However, we consider that the policy, as currently drafted, is ambiguous and object on that basis.</p> <p>4</p> <p>The policy should be amended to clarify that this policy relates to proposals for non-employment uses only, as clearly employment uses should in principle be considered acceptable on sites allocated, and currently utilised, for such uses.</p>	<p>Comments noted, and accepted. Wording of the second para. is not clear, and could be made clearer if it was re-worded to make it obvious that it relates to non-employment uses.</p>	<p>Amend second para. by inserting 'non-employment' between 'any' and 'use'</p>
Policy 29 - Farm Diversification				
20214	Comment	No Comment from Bidwells	'No comment' position noted	No change proposed to policy
Policy 30 - Business and Domestic Equine Related Activities				
20215	Comment	No Comment from Bidwells	'No comment' position noted	No change proposed to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19873	Comment	Suggest para a to read: the size, scale, design, including amount and type of lighting and fencing, does not have a significant adverse appearance on the local landscape character and appearance of locality	Agree that lighting and fencing can have a significant impact.	Amend criterion a) to read 'the size, scale, design and siting of new development (including lighting and means of enclosure), does not have....'
<i>Policy 31 - Re-use or Replacement of Buildings in the Countryside</i>				
20216	Comment	No Comment from Bidwells	'No comment' position noted	No change proposed to policy
20178	Comment	We consider the wording of criterion D is not consistent with the recommended approach of the Taylor Review of the Government's response to this review in March 2009	<p>The NPPF requires support to be given to the sustainable growth and expansion of business and enterprise in rural areas, including through the conversion of existing buildings. This support must be for sustainable proposals however. Accordingly, in instances where a proposal is likely to create a significant number of jobs that is likely, in turn, to lead to significant movements to and from a site, then it is considered reasonable, in the interests of sustainability, to ensure that such uses are 'well located' in relation to towns and villages and in circumstances where there are not so well related, to ensure that they are accessible by other means than the private car. In recognition of the lack of public transport provision in rural areas, and in response to this representation, it is considered justified to replace the word 'readily' with 'reasonably'.</p> <p>In relation to criterion C it is not considered that the policy would be unduly restrictive. It seeks to provide a balance between the desire to support economic growth in rural areas through the re-use of buildings, and the desire to promote sustainability aspirations through the location of proposed uses and the need to support sustainable transport solutions. It is considered that this balance is effectively struck in the wording of this policy.</p>	Amend criterion D - replace 'readily' with 'reasonably'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20085	Object	The policy purports to cover both the re-use and replacement of buildings in the countryside. In fact, while it covers the re-use of buildings it makes no mention of their replacement. The policy should state the circumstances in which a replacement building may be permitted. These could include where a replacement building would retain the visual, architectural or historical coherence of a group of buildings, in cases where this would otherwise be lost (e.g on a traditional farm homestead).	Agree	<p>Add additional paragraph to read; 'Furthermore, in exceptional circumstances and notwithstanding criterion a) above, it may be appropriate to permit the replacement of a building where:</p> <p>g) the replacement building will result in a more acceptable and sustainable development than might be achieved through conversion;</p> <p>h) the replacement building would restore the visual, architectural or historical coherence of a group of buildings where this would otherwise be lost.</p> <p>Buildings which are remote, or have become so derelict, have been abandoned or are otherwise incapable of adaption or re-use will not be considered favourably for replacement.</p>
<i>Policy 32 - Tourism Development</i>				
20137	Comment	The policy fails to address the impacts of tourism development upon the surrounding road network, or the impact it might have upon wildlife, particularly ground nesting birds. The policy should also require any road alterations to be in keeping with the character of roads already in that area.	<p>Impacts upon surrounding roads, including the impact of any necessary alterations upon character, are considered under Policy 1. Impacts upon ecology are considered in relation to Policy 1 and Policies 10, 11 and 12.</p> <p>The document should be read as a suite of policies when considering development proposals.</p>	No change to policy proposed.
20078	Comment	Is there a consideration to the re development of existing structures worthy of saving. Where new buildings would be introduced would / are they to be aesthetically pleasing to the current surroundings.	This is addressed by criteria c) and f).	None
20217	Comment	No Comment from Bidwells	'No comment' position noted	No change to policy
19872	Comment	suggest new paragraph e. Proposals are of suitable scale and design suitable for location so as to not detract from its landscape character	This is adequately covered by criterion c).	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19905 19986	Support	<p>This area is currently under-served with self-catering tourist accommodation, compared to other areas of East Anglia, yet it has much to offer. We currently get over-demand every year for our own single holiday dwelling, and we know that our visitors, often from overseas, hugely value the natural resources and the nearby historic locations which the area has to offer, and can be justly proud of. The rural locations will benefit from this proposed policy enabling them to gain a share of the tourist pound, and it is right that any new development should enhance what the region already has.</p> <p>We currently operate a single self-catering holiday dwelling and our experience tells us that there is a growing need for quality self-catering holiday accommodation in the countryside areas providing this is sympathetic to the local environment natural and built environments. This will serve as a welcome boost to the local economy and support the many local visitor attractions.</p>	Noted	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7 Retail, Community Facilities and Leisure				
7.3				
19880	Comment	In the 4th line the comma after "Some" should be deleted.	Noted	Delete comma after 'Some'
7.4				
19989	Comment	We support paragraph 7.4 on page 65 but are struggling to find an appropriate policy that will protect and enhance your cultural facilities (theatres, cinemas, museums and libraries) that provide vital services for your town centres.	Noted	None
7.7				
19881	Support	The first sentence needs clarification . The word "centre(s)" appears 3 times, each with a different meaning and is confusing to this reader.	Noted. This is wording taken from central government advice and could be improved.	Amend the first sentence to read; 'Proposals for main town centre uses for sites elsewhere will need to demonstrate.....on existing town centres.'
7.8				
20023	Object	The southern Bury St Edmunds town centre boundary reaches substantially into the main residential area in the mediaval grid , running in an east-west direction parallel and to the south of Churchgate Street The CAA propose a new boundary still parallel to Churchgate Street but moved northwards aligned to Langton Place. All of Langton Place would remain within the town centre business boundary	It is not for this document to define boundaries. These will be defined by Area Action Plans (Bury St Edmunds Vision 2031) and/or the Proposals Map.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19942	Support	The Newmarket Town Centre boundary should be reviewed and changed at the former swimming pool end of the High Street. The boundary should extend as far as the current Total garage and include the site of the former swimming pool and the Queensbury Lodge / Fitzroy Land (Forest Heath draft site specific reference FHDC/N/11). This will encompass the site which is being promoted for a mixed use development including an ASDA supermarket, an hotel, car parking and other retail and restaurant uses which will regenerate and safeguard the High Street with significant community benefits.	It is not for this document to define boundaries. These will be defined by Area Action Plans and/or the Proposals Map.	None
<i>Policy 33 - Proposals within the Town Centre Boundaries</i>				
19923	Comment	This comment relates to the inclusion of Waitrose within the Primary Shopping Area of Newmarket. The Waitrose fits the definition of edge of centre sites and should be defined as such. The inclusion of the Waitrose store in the PSA would constitute bad practice and could lead to poor decision making.	It is not for this document to define boundaries. These will be defined by Area Action Plans and/or the Proposals Map.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20113	Comment	Criterion A sets out a dated approach to managing the balance of retail. Restaurants, cafes etc can add substantially to the vitality and viability of a town centre and will help ensure that levels of vacancy remain low and investor confidence is maintained. Such uses also increase durations of stay in town centres.	<p>Criterion A does not seek to manage the balance of retail and non retail. Rather, it seeks to manage the extent of continuous non A1 frontage, which is not the same thing. An appropriate balance of retail to non retail will be supported by further monitoring of the policy to establish a suitable threshold for each of the towns, to be maintained, in the interests of vitality and viability, and in seeking to retain a 'concentration' of retail units within the Primary Shopping Areas.</p> <p>Furthermore, the comment that restaurants and cafes etc can add to the vitality and viability of a town centre is recognised and supported. It is for this reason that, elsewhere within the town centres and outside of the Primary Shopping Areas, Policy 33 is permissive of a more market-led approach to appropriate development, in accordance with the flexible approach advocated by the NPPF. However, within the Primary Shopping Areas, it is expected that the predominant use will be retail, with more diverse uses supporting the viability and vitality of the town centre outside of the PSA's but still within the town centre.</p>	No change to policy as a result of this representation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19924	Comment	<p>Comments submitted on behalf of Barclays Bank PLC.</p> <p>Recommend changes to the policy to include banks and building societies (as 'active' ground floor uses) as being generally appropriate within the Primary Shopping Areas. Argue that banks increase vitality and viability in primary frontages and that there is considerable benefit in seeking to attract A2 users who provide a high level of investment and maintenance of premises, resulting in attractive and active street frontages.</p> <p>Suggest it is made clear therefore that active ground floor uses such as banks and building societies will be appropriate in all designated frontages.</p>	<p>It is recognised that healthy town centres contain a rich and diverse number of uses and serve as more than just a destination for shopping trips. However, the Primary Shopping Area is, by definition from the NPPF, the area where 'retail development is concentrated'. It is also recognised that whilst some non A1 uses can promote high levels of footfall and encourage 'active' frontages, several consecutive non-A1 class shops can also lead to the creation of lengths of space which can discourage pedestrian footfall towards retail uses. Within this context it is considered reasonable to restrict the principle of non-A1 uses within the Primary Shopping Areas, as well as restricting the extent of any consecutive frontage which can be none A1, albeit it is accepted that the policy must also be flexible where any such proposals for none A1 use will not harm the balance of retail vitality and viability. It is considered that the policy as drafted achieves such.</p> <p>The restrictive wording of the policy must also be read in conjunction with the maps setting out the extent of the Primary Shopping Areas, and the further wording of proposed policy 33. In order to deliver the flexibility required by the NPPF the policy deliberately seeks to retain a 'concentrated' retail core, with a more responsive and market-led approach being promoted within the remaining town centre, where a much wider range of uses will be acceptable, as a matter of principle.</p>	No change proposed to policy.
19913	Comment	<p>Bury St Edmunds Town Council suggests that the Bury St Edmunds Town Centre map should be amended to include the area opposite St John's Church (running down the centre of St John's Street which would include the Bushel public house) and across to St Andrew's Street (which would include Saxon Monumental Craft) as it is mainly retail (amended map sent by email)</p>	<p>It is not for this document to define boundaries. These will be defined by Area Action Plans (Bury St Edmunds Vision 2031) and/or the Proposals Map.</p>	None
20218	Comment	No Comment from Bidwells	'No Comment' position noted	No change proposed to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19884	Comment	Bury St Edmunds Town Council suggests that the Bury St Edmunds Town Centre map should be amended to include the area opposite St John's Church (running down the centre of St John's Street which would include the Bushel public house) and across to St Andrew's Street (which would include Saxon Monumental Craft) as it is mainly retail (amended map sent by email)	It is not for this document to define boundaries. These will be defined by Area Action Plans (Bury St Edmunds Vision 2031) and/or the Proposals Map.	None
<i>Policy 34 - Protection of Local Centres</i>				
20219	Comment	No Comment from Bidwells	'No comment' position noted	No changes proposed to policy as a result of this representation
<i>Policy 35 - Public Realm Improvements</i>				
20118	Comment	We recommend that the text of policy 35 goes further to recognise the importance of good quality public realm in promoting sustainable modes of transport such as walking and cycling.	The supporting text to policy 35 makes it clear that the quality of the public realm has an important role to play in promoting sustainable modes of travel such as walking and cycling. It is not considered necessary, within this context, to change the wording of the policy.	No change to policy
20220	Comment	Policy 35 is onerous. Any requirement to approve public realm should only be applied where it is demonstrably necessary to mitigate against the impact of the development proposed and only where it can be demonstrated that it would not impact upon the viability of development proposals. The role of the policy in light of any forthcoming proposals through CIL is also questioned.	Policy 35 is not considered onerous in principle, albeit it is accepted that any contribution sought must be justified, and changes proposed in response to comments elsewhere recognise this. It is not considered necessary to include issues of viability within the policy since consideration of such is an established principle.	See changes proposed to representations 20000 and 20014
20130	Comment	The importance of improvements to the public realm are acknowledged, and Policy 35 is supported. It is important that it is acknowledged within the policy wording that it is town centre developments that will be contributing to these improvements. It would be inappropriate to require development outside of these town centres to contribute.	Support for policy 35 noted. It is not considered that the policy should be applied only to development proposals within town centres and it is not considered inappropriate to secure contributions from development elsewhere. Residential development elsewhere, for example, may justify a contribution if it is to improve walking and cycling routes towards nearby local or town centres. On this basis, the policy as drafted is considered acceptable.	No change to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20014	Object	<p>Fail to see how public realm improvements can be said to pass tests in CIL Regulation 122 and:</p> <ul style="list-style-type: none"> * be necessary to make the development acceptable; or * be directly related to the development; or * be fairly and reasonably related. <p>The policy should be deleted as it is</p> <ul style="list-style-type: none"> - Not consistent with National Policy - Not justified 	<p>The principle of making a contribution towards the costs of public realm improvements, as a results of direct impacts arising from a development (for example, greater pedestrian use of routes between a development site and a town centre), is considered wholly in accord with the legal framework set out within the CIL Regulations. It is noted however that there may be occasions where a contribution cannot be justified so it is considered reasonable to insert the words 'where justified' between the words 'will' and 'be' in the first sentence.</p>	<p>Amend policy as follows -</p> <p>Proposals for new major development or redevelopment in the towns will, where justified, be required to provide or contribute towards public realm improvements appropriate to the scale of the proposal. Proposals in the Primary Shopping Areas should also provide active street frontages to create attractive and safe street environments.</p> <p>Note: Necessary improvements to the public realm will be identified and schemes and priorities outlined in Area Action Plans for the towns. Where appropriate the Local Planning Authority will secure public realm improvements through the use of conditions and/or planning obligations.</p>
20000 20159	Object	<p>This policy is too inflexible. It requires major development or redevelopment to contribute to public realm improvements. This should be reworded so that contributions are made where they are fairly and reasonably related to the development so that it accords with national policy and planning law.</p>	<p>Comments noted - similar nature of comment to those made within representations 20000 and 20014 and the amendments proposed in response to that comment are considered satisfactory to address this representation.</p>	<p>No further change to the policy, over and above amendments made as a result of representations 20000 and 20014.</p>
<i>Policy 36 - Shop Fronts and Advertisements</i>				
20132 20221	Comment	<p>Have no comments on this proposed policy</p>	<p>No comments noted</p>	<p>No change to policy</p>
<i>Policy 37 - Street Trading and Street Cafes</i>				
20222	Comment	<p>Have no comments on the policy.</p>	<p>No comments position noted.</p>	<p>No change to policy</p>
<i>Policy 38 - Ancillary Retail Uses</i>				
20223	Comment	<p>No Comment from Bidwells</p>	<p>No comments position noted.</p>	<p>No change to policy</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20080	Object	should include village halls as it should be heart of a village .Such Village hall & Post office combo if relocation of PO / other required.	Policy 38 is intended to relate to mixed uses where the possibility of some modest retail sales are expected but where it is also considered reaosnable, in the interests of sustainability, to limit such sales. This is not considered relevant to the issue of potential sales at village halls, perhaps as temporary post offices, since this would be covered by Policy 39, which would, in principle, be supportive of such sales.	No change proposed to policy.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 39 - Community Facilities and Services</i>				
20101	Comment	<p>Reference is made to compliance with PPS12 and PPS4.</p> <p>States that is not in the public interest to seek to safeguard all sites which are not valuable where good accessibility to alternatives will remain.</p> <p>The supporting text must make it clear that the LPA's need to objectively assess the community facility needs of their communities</p>	<p>Comments noted - PPS12 and PPS4 are both superseded by the NPPF.</p> <p>Para. 70 of NPPF seeks to 'guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs'.</p> <p>Para. 7.18 simply re-iterates the policy, albeit not entirely correctly since it states that the change of use or redevelopment of community facilities and services will be resisted, whereas in fact the policy is permissive, albeit subject to strict criteria.</p> <p>The policy does not seek to safeguard all facilities and services although reference to the term 'valued' would bring it closer to the NPPF wording. Furthermore, the policy does not seek to retain facilities and services where good access to alternatives remains, as is presently reflected in criterion D.</p> <p>Issues of viability are inherently recognised within the policy. Where the market has deemed any particular use or site unviable (and, ultimately, it will be for the market to balance supply and demand) for any reason then the policy allows for demonstration of this through criterion A.</p>	<p>Delete Para. 7.18</p> <p>Amend policy 39 to read -</p> <p>The provision and enhancement of community facilities and services will be supported where they contribute to the quality of community life and the maintenance of sustainable communities. Proposals that will result in the loss of 'valued' facilities or services which support a local community will only be permitted where:</p> <p>a) it can be demonstrated that the current use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months; and</p> <p>b) it can be demonstrated that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; and</p> <p>c) there is no evidence of significant support from the community for the retention of the use; or</p> <p>d) alternative facilities and services are available or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking. Where a local need has been identified the Local Planning Authority will require developers of residential schemes to enhance existing community buildings, provide new facilities or provide land and a financial contribution towards the cost of these developments.</p>
20179	Comment	<p>It is considered that the policy is unduly onerous and has the potential to stifle redevelopment of such site, particularly in the areas where this is most needed such as rural areas.</p>	<p>Comments noted and to a limited degree accepted - see responses made under representations 20101 and 20131</p>	<p>See changes proposed under representations 20101 and 20131</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20160	Comment	The policy needs to make it clear that provision will only be required where it is directly related to the development.	<p>Comments relating to contributions only being required where it is directly related to the development are noted, and accepted.</p> <p>The response to representation 20241 makes this clear, and amendments to address this point are proposed.</p>	See amendments to policy proposed in response to representation 20241.
20224	Comment	The definition of community facility and services is too wide. It currently includes business such as shops and pubs etc. Where such businesses have become financially unviable or unsustainable it is inappropriate to apply a sequential approach to alternative uses. In addition community support for a service / facility is an insufficient reason upon which to refuse an application for re-use / conversion / re-development, such support taking no account of financial viability.	<p>The response to representation 20101 makes it clear that the Authorities will be expected to objectively assess the value of community uses.</p> <p>The response to representation 20131 also makes it clear that criteria A and B are considered sufficient and reasonable, and that criterion C cannot be justified.</p>	See changes proposed in relation to representations 20101 and 20131
20131	Comment	<p>The principle for the provision and enhancement of community facilities and services is acknowledged. The requirement to enhance, provide or contribute towards existing or new facilities is also acknowledged, provided there is sufficient evidence to justify and reason these requirements.</p> <p>11.2 Although the loss of existing facilities and services must be closely examined, the inclusion of both points b) and c) is questioned. Point b) requires a demonstration that there is no longer a local need for the facility, while point c) requires there is no evidence of significant support from the local community for the retention of the use.</p> <p>11.3 By definition, if it can be demonstrated there is no local need, then there should be no need to test local support. Vice versa, if there is local support one would assume there is a local need. For example, what view would a Local Authority take if it can be physically evidenced and demonstrated that a village pub only has 10 customers a week, yet over 300 or the 500 local residents wanted to keep the pub. It is therefore considered that the inclusion of both points b) and c) is unnecessary, and that point c) should be removed as it merely adds an extra opportunity for a failing community use to be prevented from being regenerated</p>	<p>Support for the principle of the policy noted. Comments around 'significant support' noted and accepted. Support for a particular community use is not, on its own or in combination with other factors, likely to be determinative. If it shown that a present use if not viable, there is no local demand for it, and that the site is not needed for any alternative community use, then it should be accepted that the site can be lost and that the regeneration and economic benefits of redevelopment should be capable of being accepted.</p>	<p>Amend policy as follows -</p> <p>criterion B - remove 'and' and replace with 'or'</p> <p>criterion C - delete</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20001	Object	Whilst we recognise the need to enhance existing facilities or provide new facilities as part of any residential scheme, it is important to state within Policy 39 that the provision of these improvements should be appropriate to the scale of the development.	Noted and agreed	See response to representation 20101
20241	Object	Any requests would need to comply with the statutory tests within the CIL Regulations.	Any such enhancement of existing facilities or provision of new facilities will need to be justified with reference to the tests within the CIL Regulations. Comments noted and some reflection of this, and of the fact that any such improvements must be appropriate to the scale of the development is accepted.	Amend policy as follows - amend final para. - 'Where a local need justifies such, proposals for residential development will be expected to contribute to the enhancement of existing or the provision of additional facilities, at a level appropriate to the scale of the development proposed.'
19976	Support	<p>Sport England supports this policy in principle because it supports the protection and enhancement of indoor sports facilities such as village halls or sports halls.</p> <p>Where equivalent replacement facilities are to be provided, the policy should refer to the need for equivalent management arrangements, as Sport England would not support the loss of community facilities where they were to be replaced by commercial facilities that are not as accessible to all members of the local community (eg, a village hall replaced by a commercial facility requiring private membership).</p>	<p>Support for policy noted.</p> <p>The view that there is a need for equivalent access arrangements is noted. The policy requires any replacement provision that might be considered acceptable with reference to criterion D to be of 'at least an equivalent standard' and it is considered that this would allow for consideration of community / public access standards, insofar as they are a material consideration.</p>	No change to policy proposed.
7.19				
19936	Support	The suggestion at a 2011 workshop that parkland be established between the golf course and Calford Green is a positive one. There is a lack of quality parkland in this part of the county, and if established would help to preserve the character of Calford Green, the setting for its listed buildings, and its rich and varied wildlife.	<p>Support noted.</p> <p>A positive element of the proposal which seeks to support the comments in Para. 7.19 is considered appropriate.</p>	<p>Amend policy 40 by the insertion of the following at the start of the policy -</p> <p>'Proposals for the provision, enhancement and expansion of amenity, sport or recreation open space or facilities will be supported subject to compliance with other policies within this DPD'</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 40 - Open Space, Sport and Recreation Facilities</i>				
19977	Comment	Sport England supports this policy in principle but recommends that certain areas of the policy need to be more specific in terms of guidance for potential applicants, as set out above.	1) Noted 2) Noted and agreed 3) Reference to a 'high standard' relates to the layout and external appearance but it is accepted that changes could be made to strengthen consideration of internal layouts.	Amend criterion b to read 'replacement for the space or facilities lost is made available of at least equivalent quantity and quality and in a suitable location to meet the needs of users of the existing space or facility'. Amend final paragraph as follows - 'Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout, and in accordance with other policies in this DPD'.
20225	Comment	The policy simply repeats the NPPF and so will need to be reassessed.	The proposed policy has been considered against the NPPF and it is considered that it supplements the requirements of Para. 74, rather than simply repeating them. On this basis it is considered acceptable.	No change to policy
20185	Comment	Opportunities for combining green infrastructure with enhancement of heritage assets as part of a multi-functional approach to open space should be sought.	Comments noted. Consideration of open space and its relationship to heritage assets is recognised as being of importance, albeit it is considered that policies 15 and 17 offer adequate opportunities for the enhancement of open space and heritage assets.	No change to policy proposed.
20161	Comment	The final para is very onerous since the buildings referred to are, by their nature, functional. The policy should be more positive and encouraging.	The requirement for high quality design stems from NPPF Para. 57. It is not considered to be onerous therefore.	No change proposed to policy.
20167	Comment	Policy 40 states that contributions and open space will be sought as part of office developments. If this approach is to be taken then it needs to be justified and what is proposed founded on a credible evidence base. There does not appear to be any evidence justifying this aspect of policy 40.	The wording of the proposed policy includes the words 'where appropriate'. It is accepted that the insertion of the words 'and justified' following such would indicate that such open space should only be sought on a bespoke basis rather than as a matter of routine. Within such a circumstance the policy is considered sound and relevant.	Insert the words 'and justified' after 'Where appropriate' in the penultimate para.
20015	Object	Paragraph 8 of PPG17 requires that the standards for open space and recreation are set out in the Development Plan. Those standards do not seem to be included within the Plan so they cannot be tested. The approach is not consistent with National Policy	PPG17 has been superseded by the NPPF. However, local authorities standards are set out within the supporting text to the policy	No change to policy proposed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 41 - Leisure Facilities</i>				
20226	Comment	No comment at this time.	No comment position noted.	No change proposed to policy
20037	Comment	The county council supports this policy, particularly the reference to different modes of sustainable transport, though experience has shown that leisure facilities have been known to cause highway problems through the generation of inappropriate parking on the highway. On that basis, we would suggest an addition to the supporting text that expresses this. 'Parking will be required to be sufficient for the facility proposed, and development proposals must not require parking on the highway unless agreed by the highway authority.'	criterion C) as worded of policy 41 is considered capable of allowing effective consideration and control of car parking, access and highway safety issues.	No change proposed to policy
20076	Support	agree in principle	Support noted	No change to policy
<i>7.26</i>				
19874	Comment	Reference here to long distance routes, eg Stour Valley Path,	reference to public rights of way is considered satisfactory and fit for purpose in this context	No change to text proposed
19882	Support	In the penultimate line "and" should be deleted and substituted with "providing".	Noted and agreed	In the penultimate line of 7.26 - replace 'and' with 'providing'
<i>7.27</i>				
20039	Comment	The reference to the Rights of Way Improvement plan needs to be updated to reflect the fact that the ROWIP was reviewed in 2011 and is integrated into LTP3 (2011-2031). In addition, the same paragraph states there are '...a number of missing links in the pedestrian rights of way network'. The word pedestrian is unnecessary as it suggests there are issues with footpaths only. In fact, missing links affect all hierarchies of PRow.	Update on ROWIP noted. Suggested deletion of the word pedestrian, and context to comment also noted.	Replace the first sentence of 7.27 with 'Suffolk Rights of Way Improvement Plan was updated in 2011 and forms part of the Local Transport Plan (2011 - 2031)' In final sentence - delete the word 'pedestrian'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7.28 20040	Comment	We would suggest the words in 7.28 are strengthened and expanded.	Comments noted. Text is broadly fit for purpose but some strengthening of the mitigation would be beneficial.	In the penultimate paragraph insert the word 'adequately' between 'are' and 'mitigated'
<i>Policy 42 - Rights of Way</i>				
20227	Comment	<p>It is inappropriate to refuse development on the basis that it affects the 'character' of an existing or proposed right of way. The test should be whether it affects people's ability to use the right of way.</p> <p>Improvements to rights of way should only be sought where it can be demonstrated that the improvements will directly mitigate the impact of the development proposed.</p>	<p>Use of rights of way, in particular those in rural areas, goes beyond simple physical access, and embraces the enjoyment that walkers, horse riders and cyclists obtain for using it. Within this context it is considered reasonable to seek to protect the character of such rights of way, in the public interest.</p> <p>Where improvements to existing rights of way are sought from development proposals they have the potential to increase pedestrian and cycle use of such routes, thereby potentially significantly increasing the sustainability of proposals and also improving the quality of their layout and design. Such aspirations are considered compliant with the aims and objectives of the NPPF.</p>	
19841	Support	There are you say many opportunities missed in making available safe walking opportunities in our countryside. There have been too many poorly planned diversion routes and restrictions which are unnecessary when the aim should be to encourage outdoor activities such as walking.	Comments and support noted	No change to policy proposed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8 Transport				
<i>Policy 43 - Transport Assessment and Travel Plans</i>				
19918	Comment	Financial contributions towards the delivery of improvements to the existing transport infrastructure should be appropriate to the scale of the development and this should be stated within Policy 43.	In order to be CIL Regulations compliant any contributions or works required must be justified, and appropriate to the scale of the development, but stating of such implicitly within the policy is reasonable.	Amend policy as follows - first sentence of penultimate para - 'Developers may also be required to make a financial contribution, appropriate to the scale of the development, towards the delivery of improvements to the existing transport infrastructure that negates the impact of cumulative development in a given area and / or improves access to and use of more substantial transport modes.'
19914	Comment	This representation is a general comment in relation to a train station at Haverhill.	Haverhill has no rail connection so a railway station is not necessary. The provision of a railway connection and station is a decision that is above the scope of this document.	No change proposed to policy
20133	Comment	The requirements for major developments to provide a transport assessment and travel plan is acknowledged. It is anticipated these requirements, plus any necessary transport mitigation, will be taken into consideration when the viability of the whole scheme is considered. The penultimate para. suggests that developers may also be required to make financial contributions towards transport improvements that negates the impact of cumulative effects. The Local Authorities are reminded that there will only be a definitive amount of money available from each proposed development, which will be determined through viability testing. Once it has all been used up there will be no more.	Acknowledgement of Transport Assessment and Travel Plan requirements are noted. Comments in relation to viability are noted but it is not considered necessary to amend the policy since matters of viability must always be universally taken into account and it is not considered necessary to specifically refer to such in each and every policy.	No change proposed to policy.
20228	Comment	Requirements for contributions to improvements to the existing transport infrastructure can only be sought where it can be demonstrated that it is necessary to mitigate the impacts of the development proposed.	Comments noted and accepted. It is considered that the wording of the policy as proposed is clear and fit for purpose, and must sit within the legal framework of the CIL Regulations in respect of any contributions sought.	No change proposed to policy.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20041	Comment	The county council welcomes the status given to transport as a development consideration, with a policy dedicated solely to Transport Assessment and Travel Plans. However, we would suggest that the emphasis be changed both within the policy and the covering text, in order to be in line with current practice, which tends to place greater emphasis on the Travel Plan over the Transport Assessment/Statement.	It is not considered that any change in emphasis is necessary. A Transport Assessment is an essential pre-requisite in order establish the effect of a development and to inform the subsequent content of any travel plan and other mitigation measures. They each remain an integral element of development proposals.	No change proposed to policy.
20242	Object	The policy identifies that developers may be required to make financial contributions towardst he delivery of improvements to the existing transport infrastructure that negates the impact of cumulative development in a given area. We would highlight that the council needs to demonstrate how any requested contribution complies with the statutory tests. Within this context, we would query whether a financial test that is to address existing deficiencies or those arising from other schemes meets the tests	Comments around the CIL Regulations noted and agreed. Any contributions sought must be CIL Regulations compliant and it is considered that the policy is so compliant. Any cumulative impacts are considered capable of being mitigated, but, as is set out in response 19918, and such contribution must be appropriate to the scale of development proposed.	No further change to policy over and above that proposed in response 19918.
20002	Object	Financial contributions towards the delivery of improvements to the existing transport infrastructure should be appropriate to the scale of the development and this should be stated within Policy 43.	Haverhill has no rail connection so a railway station is not necessary. The provision of a railway connection and station is a decision that is above the scope of this document.	No change proposed to policy
20081	Object	Would wish to retain thresholds as set out in current policy. All relevant traffic reports / surveys to be fully available before further consultation takes place. The size of any development is not a true indicator of the travel impact. Does it allow for the Domino effect of developments on the same route / area with seasonal changes .Thus causing congestion and "Rat Runs" Developers should make a mandatory financial contribution towards the delivery of improvements to the existing transport infrastructure before construction starts that removes the impact of cumulative development in any given area .	The thresholds proposed are considered to be robust and relevant. The policy as proposed does allow for the 'domino' impact to be taken account of and for a contribution appropriate to the scale of the development that is proposed to be sought. It is not reasonable, or CIL Regulations compliant, for a mandatory contribution to be requested on all developments.	No change to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>8.4</i>				
20095	Comment	II. The Document also mentioned in section 8.4 that the current Suffolk Parking Standard is likely to be reviewed and updated. Do you have an idea of when the update is likely to be and probably what might need to be amended.	Support noted. Details of timings for the review of the Suffolk Parking Standards are not yet known.	No change to text.
20077	Support	The encouragement of walking is a good idea. However more speed restrictions need to be introduced to make this safer. For example there has been a long standing request to introduce a restriction between Barton Hill and the village of Fornham St Martin so that residents of the Russell Baron Road area can walk in safety and support the village. Footpaths should also be kept clear of obstructions.	Support for wording noted. Introduction of speed restrictions are a matter for Suffolk County Council, either as part of their LTP or via responses to individual planning applications.	No change to policy proposed.
<i>Policy 44 - Parking Standards</i>				
20138	Comment	Parking provision should be located within developments to maximise pedestrian and road safety and to minimise visual impact.	Comments noted. It is accepted that car parking should be sited so as to minimise where possible its visual impact. Other comments relate to the parking standards, which remain outside the scope of this policy.	Amend policy as follows - The Authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. All proposals for development, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application. In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking will generally be sought in all new development proposals. Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example, by providing shared use parking, and/or car pooling as part a Travel Plan. Exceptions may be made to parking standards for economic development proposals in rural areas where satisfactory evidence and justification is included along with a transport assessment and Travel Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20229	Comment	The policy is vague and imprecise	It is accepted that the policy could be better worded and amendments have been proposed in response to other comments made in relation to this policy.	<p>The Authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. All proposals for development, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application.</p> <p>In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking will generally be sought in all new development proposals. Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example, by providing shared use parking, and/or car pooling as part a Travel Plan.</p> <p>Exceptions may be made to parking standards for economic development proposals in rural areas where satisfactory evidence and justification is included along with a transport assessment and Travel Plan.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20119	Comment	Natural England consider that the first para. of Policy 44 is confusing and suggest amendments.	Comments noted and accepted. The policy does appear confusing and poorly drafted. In particular the initial paragraph, but also in respect of the statement 'proposals for residential development will be expected to cater for anticipated levels of residential and visitor demand', which suggests parking should be provided at whatever level is 'demanded', rather than at whatever level is needed.	Amend policy as follows - The Authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. All proposals for development, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application. In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking will generally be sought in all new development proposals. Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example, by providing shared use parking, and/or car pooling as part a Travel Plan. Exceptions may be made to parking standards for economic development proposals in rural areas where satisfactory evidence and justification is included along with a transport assessment and Travel Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19840	Object	I do not believe there should be a desire to reduce town centre parking. This is especially for disabled residents. If the desire is to have a vibrant town centre trade then there should be adequate on street parking and ideally at NO COST. Many people now use out of town stores purely because the street and car park charges are so high and space availability close to the desired shops is limited. Just take a look at the state of the town centres and the empty shops, which will get much worse if the reductions stated go ahead.	The policy does not seek to reduce town centre parking from its present levels. Rather, it seeks to provide reduced levels in new development proposals, compared to the levels ordinarily sought in other development proposals. Nonetheless, it is accepted that the wording of the policy is potentially unclear and clarification is considered justified.	Amend policy, in conjunction with other amendments made in response to other comments made on this policy, as follows - The Authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. All proposals for development, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application. In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking will generally be sought in all new development proposals. Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example, by providing shared use parking, and/or car pooling as part a Travel Plan. Exceptions may be made to parking standards for economic development proposals in rural areas where satisfactory evidence and justification is included along with a transport assessment and Travel Plan.
20047	Object	proposals to reduce parking only make sense in the context of an agency established to fully control the operation of restricted parking. Currently the Council does not take any responsibility for illegal parking on double lines etc and it is left to the police to juggle this activity with many others, resulting in a very poor standard of dealing with this problem in Bury St Edmunds. No policy for further restrictions in parking should be made other than with the establishment of an agency which fully polices parking restrictions	Adequate enforcement of parking restrictions is important in ensuring any proposal to reduce the level of expected parking provision on town centre proposals actual works. However, ensuring such adequate control goes beyond the scope of this document and no changes are proposed to the policy as a result of this representation.	No change proposed to policy.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19843	Object	There is no mention of public transport commitment. Living in an area designated as a "Key Service Centre" then having the majority of scheduled buses removed has drastically changed that element of the service centre. Therefore if you are going to make major and very long lasting decisions on design, layout and provisions for car parking based on current public transport, then you must commit to continue to provide that transport - not allow it to be removed. But this is ignored in this policy, therefore the policy is meaningless.	The Authorities have no direct control over the provision of public transport but must respond in considering planning applications based on the position as it stands at the time of any such proposal. Within this context the policy is considered satisfactory and compliant with the aims of the NPPF.	No direct change to policy as a result of this representation.
19883	Support	In the first paragraph "emergency vehicles" should be included. I live in a situation where a fire-engine cannot get into the yard.	Comments noted and accepted. Insertion of emergency vehicles into the policy is considered reasonable and justified.	<p>Amend policy, including amendments made in response to other comments made on this policy, as follows -</p> <p>The Authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport. All proposals for development, including changes of use, will be required to provide appropriately designed and sited car and cycle parking, plus make provision for emergency, delivery and service vehicles, in accordance with the adopted standards current at the time of the application.</p> <p>In the town centres and other locations with good accessibility to facilities and services, and/or well served by public transport, a reduced level of car parking will generally be sought in all new development proposals. Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example, by providing shared use parking, and/or car pooling as part a Travel Plan.</p> <p>Exceptions may be made to parking standards for economic development proposals in rural areas where satisfactory evidence and justification is included along with a transport assessment and Travel Plan.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
9 Forest Heath Specific Policy - Horse Racing				
9.1				
20028	Comment	The county council also notes the specific policies on horseracing at Newmarket, which reflect the unique position and status of Newmarket.	Comments noted	No change to policy
20061	Comment	<p>I write concerning the FHDC and St. Edmundsbury Borough Council Joint Development Management Policies Options Consultation Document "Specific Policy - Horse Racing".</p> <p>I have concerns about the merit of granting planning permission for new stables for use in the racing industry especially on the Bury Side of Newmarket when there are:</p> <p>(a) existing yards standing empty</p> <p>(b) a surfeit of horses on Newmarket Heath in any case</p> <p>It seems to me far more sensible to either restrict the building of new boxes as was the policy in the 1990s or to allow redundant yards to be developed for modern use. Newmarket is an historical centre of racing but it has evolved as such over the past 400 years. Newmarket cannot be "preserved in aspic" otherwise it will fail to maintain it's position as the Headquarters of Racing. It would seem far more sensible to adapt the existing Charter to allow older yards that are struggling to remain functional in a modern world to be developed for other uses. The granting of planning permission for new yards in suitable areas would then seem more sensible.</p>	<p>The suite of policies allows, in a wider sense, for the industry to develop and expand as it wishes, within the framework of policies. Consultation will take place on all horse racing industry related applications with Jockey Club Estates who are well placed to advise on the capacity implications on Newmarket Heath and on issues relating to yard vacancies.</p> <p>Policies 47 and 48 between them set out the circumstances where redevelopment of racing related uses will be permitted. These policies continue long established policies from the 1995 local plan and are considered fit for purpose.</p>	No change to policies proposed.
20044	Support	Support with minor changes: For the purpose of factual correctness add the word HISTORIC before headquarters of the Jockey Club.	Comments noted and accepted	In Para. 9.1, insert 'the historic' before 'headquarters'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
9.2 20048	Support	Support with minor changes. Add the word TWO before racecourses. Change "exercise areas" to TRAINING GROUNDS.	Comments noted and accepted.	Insert 'two' before 'racecourses' and change 'exercise areas' to 'training grounds'
9.4 20049	Support	We would respectfully suggest deletion of the words "flexibility and cyclical volume", as those managing and working in the Horseracing Industry are trying to protect against the peaks and troughs of cyclical volume in particular as such swings of fortune are damaging to the industry.	Comments noted. The reference to the policies needing to remain responsive to the changing needs of the industry sufficiently summarises the intent of this section and removal of the wording as suggested would not impact on the strength of wording.	Amend by removing the words 'flexibility and cyclical volume'
9.5 20045	Comment	Given transport concerns in Newmarket, the county council would wish to see greater emphasis placed on the transport and travel implications of development related to the horse racing industry. On that basis, we would suggest including a new paragraph in the supporting text, below; Development related to the horse racing industry does, however, have implications for Newmarket, notably in terms of traffic impacts. The local planning authority and local highway authority will both work with the horse racing industry to promote the safety of horses, riders, pedestrians and all other road users.	The additional text provided context for criterion C of proposed policy 45 and is therefore considered to be relevant and useful supporting information.	After Para. 9.4 insert the following Para. 'Development related to the horse racing industry does, however, have implications for Newmarket, notably in terms of traffic impacts. The Local Planning Authority and Local Highway Authority will both work with the horse racing industry to promote the safety of horses, riders, pedestrians and all other road users'.
<i>Policy 45 - Development Relating to the Horse Racing Industry</i>				
20120	Comment	Natural England has no comment on this chapter.	No comment position noted	No change to policy proposed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19908	Comment	Please see attachment. This representation relates to training yards.	The suite of policies allows, in a wider sense, for the industry to develop and expand as it wishes, within the framework of policies. Consultation will take place on all horse racing industry related applications with Jockey Club Estates who are well placed to advise on the capacity implications on Newmarket Heath and on issues relating to yard vacancies. Policies 47 and 48 between them set out the circumstances where redevelopment of racing related uses will be permitted. These policies continue long established policies from the 1995 local plan and are considered fit for purpose.	No change to policy
20230	Comment	No comment at this time.	No comment position noted	No change proposed to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20093	Comment	<p>Having read the document,I welcome the co-operation which it demonstrates,co-operation which will obviously bring advantages to our area.I welcome the assurance which has been given that all policies contained in the document form an integrated whole,including the contents of Chapters 9 and 10(pp.83-89).I understand from you that the contents of Chapters 9 and 10 differ from the rest of the document only in the sense that Chapter 9 is restricted to Forest Heath only and chapter 10 is restricted to St. Edmundsbury only.</p> <p>The Document seems to me to be,overall,a careful and commendable piece of work,which would be hard,generally,to criticise.I do,however,have concerns about some of the contents of Chapter 9:</p> <p>Forest Heath's 1995 Local Plan contained SIX Policies referring specifically to "Racehorse Training Establishments".But none of the new Policies contained in the new Document mention this type of institution,which has a precise meaning e.g.being subject to the control and disciplines of the British Horseracing Authority,which latter demands certain facilities and TOTAL control of the Yard by the Trainer,whose qualifications it sets and supervises. The new document prefers instead to refer to the (far more vague)"Horse Racing Industry",whose members are varied,of high qualifications and none,and subject to varying levels of control,being fully independent in some cases.In some cases,they will have access to a very high level of assets and legal advice.Only specific mention of TRAINING in the actual Policies offers protection of the standards required by the BHA- a simple mention of "intent to protect" in the accompanying text is inadequate in practice.</p> <p>Consequent upon my observations over the years,Policy 45 is far too permissive.It is not difficult for someone, expert and determined, to show that "need" equates to "want";access statements are sometimes less than thorough(when have detailed street movements of horses been monitored?);the "appearance and character of the townscape" is subject to different interpretations; and "operation and management" is a hazy notion bearing in mind that "horse racing establishment" is a very loose definition. All in all-and bearing in mind that the local</p>	<p>Comments on co-operation noted.</p> <p>Experience of the operation of the 1995 Local Plan policies and their reference to Racehorse Training Establishments has indicated that the policy, and the level of protection to be afforded, is considerably more robust when the policy is drawn around the 'industry' generally, rather than simply around specific elements such as training establishments. The industry is diverse and works together as a cohesive whole. Within this context it is better to consider the impacts of development upon the industry generally rather than in relation to specific elements of it.</p> <p>The policy is deliberately permissive. It seeks to provide support to the 'industry' within a context within which it has existed and grown for centuries. Given the importance of the 'industry' to Newmarket this is considered a reasonable stance. Of course appearance and character of the townscape are subject to an individuals subjective interpretation but that highlights the role of the LPA in seeking to arbitrate on individual proposals.</p> <p>All proposals, including any submitted within the context of policy 45 are also subject to full scrutiny under the entire suite of policies. For example, therefore, any proposal which lead to pollution as suggestion may therefore fall foul of policy 1 criterion H, V.</p> <p>The importance of the 'industry' to Newmarket is of significant importance, but in all decisions, a balance between competing policies must be struck and it is considered that the document, reading as a suite of policies, enables this balance to be effectively struck.</p>	No changes to policies proposed.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Conservation Area Appraisal has recently been officially interpreted (not by Committee!!) to mean that "open spaces such as paddocks are to be preserved for the use of the Horse Racing Industry" is an expression that essentially means "open spaces that are available as building sites for owners of Conserved Racing Land"-we have a situation where attractive and expansive greenfield sites will be available to a wide variety of people,as I mention above,and such people will have the freedoms described in the preceding paragraph.</p> <p>The drawbacks,e.g.pollutions,of horse stables have been addressed elsewhere in the Joint Document,and Policy 45 would advisedly be tempered by an accompanying reference to such disadvantages- and the curbs which might flow from them in fairness to other citizens of Forest Heath.</p> <p>I also think that Policy 46 is too sweeping and thus unfair to other citizens or businessmen.Protection and Conservation do not equate to Hegemony and Absolute Privilege.This Policy could be read as a Restraint on Trade-I have heard such an argument recently being used to oppose development of a supermarket in what seems to me to be a reasonable spot.After all,the public roads belong to all and are available for the use of all.</p> <p>I was pleased to see the reference to Article 4 Directions,used for the protection of valuable features.I would like to commend their future use throughout the Joint Area.</p>		
20046	Comment	<p>Given transport concerns in Newmarket, the county council would wish to see greater emphasis placed on the transport and travel implications of development related to the horse racing industry.</p> <p>We would suggest modifying sentence c) of policy 45 to read as follows:</p> <p>c) access proposals (including the movement of horses for training) and the impact of all movements are acceptable to the local highway authority.</p>	<p>Comments noted and accepted, although it is considered, in reflection, that any decision is for the LPA to take, albeit in conjunction with the highway authority, but that reference to the highway authority within criterion c is potentially misleading and should be rmeoved, in conjunction with the changes suggested here.</p>	<p>Amend criterion C as follows -</p> <p>'c) access proposals (including the movement of horses for training) and the impact of all other movements are acceptable.'</p>
20050	Support	Support	Support noted	No change to policy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 46 - Development Affecting the Horse Racing Industry</i>				
19998 20003	Object	As currently phrased, policy 46 seeks to apply the test of 'adverse effect'. This is a very low threshold and could be triggered by some minor or non material impact which, in reality, would not be a threat to the "horse racing industry as a whole". Amend Policy 46 to read "Any development, including other development proposals within and around Newmarket, which would have a material adverse impact on the operational use of an existing site within the horse racing industry, or would threaten the long term viability of the horse racing industry as a whole, will not be permitted".	see 19998	Amend policy 46 as follows 'Any development within or around Newmarket which is likely to have a material adverse impact on the operational use of an existing site within the horse racing industry, or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted'.
20051	Support	Support with minor amendments. To make the policy wording consistent and effective amend as follows; 'Any development , including other development (delete "proposals") within and around Newmarket, which (delete "would") IS LIKELY TO adversely affect the operational use of an existing site within the Horseracing Industry, or the Horseracing Industry as a whole, will not be permitted'.	see 19998	Amend policy 46 as follows 'Any development within or around Newmarket which is likely to have a material adverse impact on the operational use of an existing site within the horse racing industry, or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Policy 47 - Redevelopment of Existing Sites relating to the Horse Racing Industry</i>				
19940	Object	Policy 47 should be amended so that the alternative uses permitted in the re-development of existing sites relating to the horse racing industry include "uses with significant community benefits" rather than being restricted to uses directly related to the horse racing industry.	See also response 20004 The horse racing industry has existing in Newmarket for centuries. As the supporting texts makes amply clear, it is very important that irreversible decisions are not taken which threaten the town's long term position as the headquarters of racing. It is also the case that vacancy, even over an extended time frame, does not indicate that the site cannot be used by the industry at some stage in the future. It may be the case, on an individual case by case basis, that any 'significant community benefits' outweigh the harm as a result of any conflict with this policy but this is an argument that can be made on a bespoke basis and, given the context set out above, does not justify an amendment to this proposed policy.	No change proposed to policy.
20004	Object	The policy should allow for a change of use where a site is allocated for an alternative use in the Local Development Framework or in exceptional circumstances. Exceptional circumstances should not only apply to alternative uses directly related to the horse racing industry.	See response to 19940	No change proposed to policy
20052	Support	Support with minor changes. Change "exercise areas" to TRAINING GROUNDS.	Comments noted, and accepted.	Amend as follows - change 'exercise areas' to 'training grounds'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
9.13 20053	Support	Support with minor changes. The Horsemen's Group generally supports the purpose and remit of the policy. However, the Group suggests it would be useful towards the understanding of the context for this policy to refer to an example in point at the end of paragraph 9.13 as follows: 'For example, at Queensbury Lodge it may be appropriate to consider some enabling development in the yard itself but utilising as much of the paddocks as possible for horse racing related purposes and protecting the adjoining horsewalk. Each case will be considered on its individual merits taking into account other policies in the DPD.'	The comments are noted. However, it is not considered necessary, when the policy is intended to be generic, to refer, even within the supporting text, to specific examples. The Authority can prepare separate specific guidance for particular sites should these be considered necessary.	No change to policy proposed.
<i>Policy 48 - Securing the Restoration of Horse Racing related Assets</i>				
20186	Comment	See attachment relates to chapter 9 and policy 48	Comments noted. Policy 48 specifically excludes an exemption to the positive wording of the policy in relation to sites that have deliberately allowed to fall into disrepair.	No proposed change to policy
19946	Object	Policy 48 is unviable, unworkable, unrealistic and will prevent, rather than encourage, the restoration of listed buildings which were previously in horse racing uses. The policy should be replaced with one which allows alternative uses of the listed building to secure its retention and which is not based on the "minimum necessary" enabling development criteria.	It is considered impossible to consider, at this stage, and on the basis of a generic policy, that it unviable, unworkable, or unrealistic. neitehr it is considered that it will prevent the restoration of listed building and, in any event, if it does, other powers are available to the Authority to restore such heritage assets if nrequired.	No change proposed to policy.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20054	Support	<p>Support with changes. Delete clauses c) and d) and replace with clauses c) and d) below, for the purposes of clarity;</p> <p>c) That the development of the Horseracing Related Historic assets (including paddock land) provides for the re-provision of equivalent facilities to the Horseracing industry (including paddock land) within the area of development which may include land adjacent to that occupied by the Historic Racing Related Historic asset, or where the land to be developed is paddock land, it will need to be demonstrated that the benefit of the enabling development to the Horseracing Industry significantly outweighs the loss of any paddock land;</p> <p>d) That it will secure the re-establishment of a historic racing yard within the development, with an appropriate and enforceable legal mechanism; and</p>	<p>As suggested by the respondent, criterion c of the policy would be very difficult to apply, since 'equivalent' facilities would need to be provided on the same or adjacent site, which may not be possible since the 'enabling' development may be elsewhere, and also since 'equivalent' would be difficult to quantify.</p> <p>Suggested amendments to criterion D are considered to improve the clarity and wording of the proposed policy, albeit the wording 'within the development' should not be included since the enabling development may not necessarily be on the site of the racing yard, but could conceivably be elsewhere. Suggest using the Jockey Club's suggested wording, but without the words 'within the development'</p>	Amend criterion D as follows - 'd) That it will secure the re-establishment of a historic racing yard with an appropriate and enforceable legal mechanism; and'
<i>9.18</i>				
20055	Support	<p>Support with minor changes. Change "gallops" to STABLE YARDS for clarity.</p>	Comments noted and accepted. Changes justified for clarity	Amend 'gallops' to 'stable yards'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
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10 St Edmundsbury Specific Policy - Rural Housing Exception Sites

10.1

19910	Comment	<p>Having lived in Hopton for over 40 years we are very interested in the way development will be determined in the village in the future.</p> <p>In 2010 the St Edmundsbury appraisal of site (1) SS17 as suitable for development was negative because its development was thought to be adverse to an existing viable business.</p> <p>We disagree with this decision as this site would be ideal for residential development, being right in the centre of the village with easy access to all facilities allowing the public house continue with its car park and most of its garden space. Any development would be further away from the pub than all existing dwellings and (2)</p> <p>'this site already lies within the settlement boundary and is suitable in principle for residential development'.</p> <p>According to government policy there is a need for modest, affordable houses and this would be an ideal site for such a development.</p> <p>We await your reply with interest and would be pleased to discuss the matter further.</p>	The purpose of the policy is to provide the criteria for the consideration of rural housing exception sites, rather than to identify specific sites.	Notes
20096	Comment	<p>Under section 10.1 the Document talks about Rural Housing Exception Sites. Bearing in mind that local residents in some areas seem to abhor Social/ Affordable Housing for the sake of it don't you think that schemes that fall within these sites run the risks of being thrown out by the local residents, even when there may be a genuine need for such? Does the Authority have a system in place to distinguish the genuineness of need of Social/ Affordable Housing in such areas?</p>	It is acknowledged that delivery of exception sites relies upon the identification of local need, which requires partnership working between Parish Councils and the Borough Council Housing Enabling Team. It also relies upon the willingness of landowners to make appropriate land available for such housing when the need has been identified.	None

Policy 50 - Rural Housing Exception Sites

20231	Comment	No comment at this time	Noted	None
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19997	Comment	Suffolk ACRE is supportive of the current policy which has helped to progress the developemnt of several local needs affordable housing schemes in both Districts. Butreduction of govenment funding to Regitered providers to progress affordable hosuing 2011-2015 HCA programme and the Localism bill,plus increasing awareness and need shown from parish local needs surveys, consideration should be taken to including in the policy that is if a need can be proven, the additional provision of a limited number of local needs units for sale ie bungalows for elderly home owners wishing to stay in the parish	The NPPF at paragraph 55 advises that LPA's should consider whether allowing some market housing would facilitate the provision of significant affordable housing to meet local needs. Policy 4 as drafted will not preclude this from happening, but including an element of market housing in this policy, or policy 50 could raise expectations in all cases, with a consequential increase in land values to the detriment of the delivery of affordable housing.	None
19992	Comment	Suffolk ACRE is supportive of the current policy which has helped to progress the developemnt of several local needs affordable housing schemes in both Districts. Butreduction of govenment funding to Regitered providers to progress affordable hosuing 2011-2015 HCA programme and the Localism bill,plus increasing awareness and need shown from parish local needs surveys, consideration should be taken to including in the policy that is if a need can be proven, the additional provision of a limited number of local needs units for sale ie bungalows for elderly home owners wishing to stay in the parish	The NPPF at paragraph 55 advises that LPA's should consider whether allowing some market housing would facilitate the provision of significant affordable housing to meet local needs. Policy 4 as drafted will not preclude this from happening, but including an element of market housing in this policy, or policy 50 could raise expectations in all cases, with a consequential increase in land values to the detriment of the delivery of affordable housing.	None
20139	Comment	Exception sites should be limited to meeting a proven need within the "parish" or immediately neighbouring parishes rather than as currently defined; "locality". A further point should be added to specify that the development would not involve the loss of high agricultural land or be sited on areas of special designation.	The need is assessed locally in partnership with parish councils. It may or may not include one or more parishes, depending on local circumstances. The use of locality in the policy provides the necessary flexibility to cater for local circumstances. The siting of development is addressed by criterion iii and additional criterion iv.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20121	Comment	<p>Whilst Natural England appreciates the difficulty in providing affordable housing in rural areas, we feel that Policy 50 (Rural Housing Exception Sites) does not go far enough to ensure that such development on exception sites does not negatively impact on biodiversity, geodiversity and the surrounding landscape character. Natural England recommends that further text is added to the Policy as follows: 'the development will not negatively impact on biodiversity, geodiversity or the surrounding landscape character. Any unavoidable harm to the natural environment will be adequately mitigated.'</p> <p>We also recommend that the policy makes reference to the importance of landscape character assessments in considering development on exception sites in rural areas.</p>	Agreed	Insert additional criterion between iii and iv stating "the development will not negatively impact on biodiversity, geodiversity or the surrounding landscape character. Any unavoidable harm to the natural environment will be adequately mitigated; and"
19842	Object	<p>There should be no exceptions to this policy; an exception is only used as cover for a poorly drafted piece of policy. Once a precedent for an exception is allowed it can, and will, be challenged in the future. This leads to an erosion of the original restrictions. A boundary must mean an absolute limit; else it means nothing and becomes an "advisory limit". If this is what you intend then the policy should be reworded to reflect this.</p>	This policy follows national guidelines for exception sites and has been in place in previous documents for a number of years.	None
19885	Object	<p>Nowhere in the Consultation paper can we find any provision for self-build sites or being built by a contractor for an individual. With the extension of old agricultural sites under the new planning regulations becoming brown field sites. No mention of this is made in your planning document.</p> <p>Building a development in bigger so called "sustainable villages" gives no opportunity for smaller communities to become more sustainable and offer the services the village requires. A small number of properties being developed in so called "unsustainable villages" would be preferable to large scale building in so called "sustainable villages".</p>	The settlement hierarchy is established by the respective Core Strategies. Policy 50 relates solely to exception sites for the delivery of affordable housing to meet local housing need. Other forms of exception can be found at Policy 4.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
19866	Object	there is no inclusion of a clause to ensure such developments do not have an adverse impact on biodiversity or features of ecological interest. this is not in line with other policies in the document and is also not fulfilling NERC requirements.	The impact of development on biodiversity or features of ecological interest is already covered by Policy 10. There is no need to repeat that policy.	None
20079	Support	As the population increases there will be a hugh demand for farmland therefore developement should not be permitted on this type land for what ever reason.	The amount of farmland lost in total across the Borough as a result of this policy is minimal.	None