

Planning Committee

06 December 2024

Agenda item number 15

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed responses.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 11 November 2024

Appendix 1 – Planning Policy consultations received

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Suffolk County Council

Three Documents:

[Suffolk Local Transport Plan](#)

[Suffolk Local Cycling and Walking Infrastructure Plan](#)

[Beccles Area Transport Plan](#)

Response due date: 25 November 2024. We have an extension until 6 December.

Status: Draft

Proposed level: Planning Committee endorsed.

Notes

Suffolk Local Transport Plan: Every Local Transport Authority must produce and adopt a Local Transport Plan. This is the fourth for Suffolk, which moves forward the existing Local Transport Plan 2011 to 2031. The Local Transport Plan 2025-2040 develops the long-term vision and provides a set of objectives that will inform transport policy and investment decisions in Suffolk up to 2040. The Local Transport Plan provides essential policy direction that informs local planning authorities' Local Plans for growth and development.

Suffolk Local Cycling and Walking Infrastructure Plan: A Local Cycling and Walking Infrastructure Plan (LCWIP) is a way for local authorities to set out their long-term approach to improving local infrastructure for walking, wheeling and cycling. A key output of an LCWIP is a set of prioritised improvements which will create a safe, accessible and comfortable network of routes over the long term. The routes are selected based on a detailed analysis and are focused on creating the greatest benefit to residents and increase levels of walking, wheeling and cycling.

Beccles Area Transport Plan: This will support the development of sustainable travel options for the town's residents and visitors, so they become more attractive and realistic choices for everyone.

Proposed response

Summary of response

Generally, Suffolk County Council does not mention the Broads or the Broads Authority. There are some inconsistencies in the strength of wording used in some instances. There are also some inconsistent references to age groups of the community throughout.

Detailed response

Suffolk Local Transport Plan

Suffolk Local Transport Plan Page 9, last para – the Broads Authority is also an LPA in Suffolk and must be mentioned.

Page 13 says '700 million miles in 2020' – is that in Suffolk, the East, UK?

Page 27 – what % of buses operating in Suffolk are zero emissions? What is the target, by when?

Page 28 – Cost is a major factor. If four adults wish to get the train, it is likely to be cheaper to pay for diesel and drive and pay for parking.

Page 47 – it is not clear why the Broads is not mentioned in this section.

Generally, the photos don't have captions, so their relevance is not clear.

Page 52 says 'Local planning authorities must develop and maintain Local Plans, setting out a long-term vision for the employment and housing growth in their districts and boroughs'. Say 'in their areas' as we are an LPA, and we are not a district or borough.

Page 53 – no mention of the Broads Authority. We are an LPA.

Page 57 says - severance is bad for our health[?] – typo

Page 60 – the text focuses on older people only in relation to social isolation. Isn't everyone of any age that is separated from social or familial contact, community involvement or access to services socially isolated? The access to services in particular is relevant to rural areas. The same with loneliness; it talks about this applying to younger people – anyone can feel lonely. What is the relevance of talking about age in this section? It distracts from the point.

Page 61 – you talk about social isolation and lack of public transport or access to the car, but is it more about lack of facilities where they live?

Page 63 - on and **an** individual's

Page 64 - Approximately a third of Suffolk's population **live** in rural areas.

Page 65 – you might want to explain what 'chain tripping' is.

Page 69 says 'Area plans for Suffolk's fifteen main towns deliver projects contributing to our Local Transport Plan themes'. We see these have been produced, but it is not clear how the Broads Authority has been involved in relevant plans.

Page 71 – benefitting one use must not be at the expense of another road user, however. This applies to all schemes.

Page 72 - Create transport hubs to improve the integration **between** walking, cycling, buses, trains, and taxis.

Page 72 – are there plans to encourage bikes on buses?

Page 72 – making cycles on trains easier, more welcome and increasing capacity could be beneficial.

Page 72 – secured cycle parking, yes, but also in a convenient location.

Page 73 The increase is likely **from** individuals obtaining licences in the latter half of the twentieth century rising through the age groups, which will likely result in older individuals having access to a motor car compared with the same age groups three or four decades ago.

Page 73 says 'This provides independent travel choice for older individuals needing to access employment, essential services, and retail and leisure facilities, but less favourable for operating commercially viable bus services which will disadvantage children, younger adults and those without a driving licence'. Older people would get a bus pass anyway. And older people using the car and not the bus is one segment of the population. All adults could use the bus so as to not disadvantage children, younger adults and those without a driving licence.

Page 76 says '...consider sustainable drainage systems in all transport infrastructure schemes'. Why is this only 'consider'? Should it not be 'deliver'? With climate change and more intense rain bursts with the associated surface water run-off, SuDS are more important now than ever. The section implies that SuDS will be done, but the title is non-committal. Page 90, 15 A says you will install SuDS in all drainage schemes. Is a lack of consistency.

Page 76 – there is a random quote with no context or source.

Page 76 says 'We will consider the impacts of our projects on carbon emissions and the need for mitigation to respond to changes to the environment' whereas on page 77 it says 'We will positively enhance the biodiversity value of our land assets, which includes the management of roadside verges'. The language used and commitment made is very different. Why is the commitment to carbon emissions weaker than biodiversity? Especially considering the quote on page 76. Page 89 says 'Whole-life carbon assessments will be undertaken for schemes to understand the impact on decarbonisation targets and to inform decision-making'. So it seems that you '...will address the impacts..' of your projects on carbon emissions.

Page 79 – figure has not copied over well with some information cut off.

Page 82 text talks about data for incidents in 2021 and 2022 whereas the infographic talks about 2023.

Page 83 - representatives of from Suffolk – typo

Page 84 says that those walking, wheeling, cycling, and motorbiking are disproportionately at risk of injury yet page 83 talks about the perceived risks of walking, wheeling and cycling and seems to say that the risk to them is lower than car use. It seems there is a contradiction between pages 83 and 84.

Page 85 uses data from 2021 – should more up to date data be used?

Suffolk Local Cycling and Walking Infrastructure Plan

Under determining the scope – you mention Districts and Boroughs, but not the Broads Authority. We are producing a LCWIP.

Under determining the scope – you don't mention the Broads Authority in the list of Districts and Boroughs.

Gathering information – were the Broads Authority involved? We are not mentioned.

Application – again, no mention of the Broads Authority.

Governance - Will you involve the Broads Authority like you say you will the Districts and Boroughs? Will the Broads Authority be on the Suffolk Walking, Wheeling & Cycling Liaison Group? The Broads Authority is not on the Governance structure.

Beccles Area Transport Plan

There is no mention of the Broads or the Broads Authority in this plan.