Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 2
The Suffolk Coastal Spatial Strategy
C - Distribution of Growth and the Settlement Hierarchy

August 2019
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Question 2.17

Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?

1. The Council consider that Policy SCLP3.1 is justified as it provides the Final Draft Local Plan (Document A1) with an appropriate strategy on which to guide the development across the District to 2036, based on a robust and comprehensive evidence base. Policy SCLP3.1 provides an ambitious strategy which meets the economic, social and environmental needs of the District through clear requirements and targets that set the context for the rest of the Local Plan.

2. The National Planning Policy Framework (Document C1) is clear in paragraph 7 that “the purpose of the planning system is to contribute to the achievement of sustainable development.” The Final Draft Local Plan (Document A1) seeks to meet the needs of the present without compromising the ability of future generations to meet their own needs and has taken into account local circumstances which reflect the character and needs of the District. Policy SCLP3.1 will deliver sustainable development across the District and it is considered to be the most appropriate option for addressing many of the issues faced in the plan area.

3. The strategy for growth set out in Policy SCLP3.1 is justified and has been informed by:
   - The National Planning Policy Framework (Document C1).
   - The Council’s Business Plan (Document G1) and Economic Growth Plan (Document G2).
   - Economic evidence (Documents D1-D5).
   - Retail evidence (Documents D6-D9).
   - Housing evidence (Document D10-D17).
   - Environmental evidence (Documents D18-D28).
   - Transport evidence (Documents D29 –D33).
   - Viability evidence (Document D38).
   - Council Topic Papers (Document D34-D37).
   - Sustainability Appraisal process at each stage of plan making (Documents A3, B2, B3, B6, B7).
• Habits Regulation Assessment (Documents A4, B8).

• Public engagement and consultation at earlier stages of plan making as detailed in the Council’s Consultation Statement (Document A10).

• Equality Impact Assessment (Document A5).

4. The strategy for growth supports and facilities economic activity in the District by supporting the key sectors that have been identified through the evidence base and the consultation stages. Alongside these key sectors the role of retail and commercial leisure activities is promoted to further boost economic activity and community cohesion in the town centres. Policy SCLP3.1 also seeks to protect and enhance the historic, natural and built environment that is cherished by the local community and is a key factor in attracting people to visit the area. Boosting the supply of housing and the mix of dwellings available across the District whilst ensuring the necessary infrastructure provision is also a key factor in the Council’s strategy for growth. Together these economic, environmental and social aspects promote the continued delivery of sustainable development across the District over the plan period.

5. The strategy allows for development to be distributed across a variety of locations in the District through the identification of Garden Neighbourhoods, enabling market towns to reflect and strengthen their roles and appropriate growth in the rural areas to support and sustain existing communities.

6. The role of the Major Centres and the market towns across the District have seen development targeted in these locations in previous Local Plan strategies in accordance with the principles of sustainable development. This approach has been continued in the emerging Local Plan as these locations provide a range of services, facilities and opportunities that can be enhanced over the plan period. The emerging Local Plan, however, also directs more significant levels of development into the rural areas of the District. Consultation responses have highlighted the need for new development in the rural areas to support and sustain the existing communities. More significant levels of development in the rural areas also has social benefits by allowing people with a local connection or those who work in the rural areas to live in these locations. Identifying a wider variety of sites in a variety of locations across the District, also ensures that the Local Plan provides a mix and choice of development opportunities and meet the requirements of the National Planning Policy Framework (paragraph 68) for the provision of small sites.

7. The housing requirement set out in Policy SCLP3.1 is for at least 582 dwellings per year to come forward (10,476 over the plan period), as calculated through the standard methodology as set out in the Planning Practice Guidance on Housing and Economic Needs Assessment (Document C2), as published the time of the preparation of the Final Draft Local Plan. The Council’s response to Inspector’s question 2.1 explains that following the publication of the revised Planning Practice Guidance in February 2019 and the 2018 affordability ratios in
March 2019, the housing need for Suffolk Coastal would be 542 dwellings per year (9,756 of the Plan period), and that the Council would support a modification to set a housing requirement of this level, consistent with the paragraph 59 of the National Planning Policy Framework.

8. A number of representations to the Final Draft Local Plan have been submitted which suggest that a higher housing requirement and/or a higher contingency should be set (Rep IDs: 980, 991, 1026, 1245, 1476, 1482, 1484, 1494, 1495, 1517). The specific points made by the representations have been considered further in response to Inspector’s question 2.21. Paragraph 3.39 of the Final Draft Local Plan shows that the Council has identified a contingency of 8.5% which is approximately 890 additional dwellings over the plan period. This figure excludes the anticipated delivery from windfall housing development of 800 dwellings over the Plan period. As explained in the Council’s response to Inspector’s question 2.3, this would equate to a contingency of 16.1% if windfall is included. Applying a housing requirement of 542 dwellings per year would provide a contingency of 24% including windfall. Policy SCLP3.1 conveys the housing requirement as a minimum through the inclusion of the words ‘at least’ in criterion c), reflecting the Planning Practice Guidance (Document C2, Paragraph 2a-002-20190220) which states that the housing need figure represents a minimum. The Council’s approach to providing for housing is therefore consistent with the Government’s objective as set out in the NPPF to significantly boost the supply of housing, and the provision of the contingency provides confidence that the figure of 542 would at least be met each year.

9. A number of representations requested that a 20% uplift should be applied to the housing figure to take account of development not coming forward (991 Gladman Developments, 1245 Hopkins Homes Limited and Hopkins & Moore Limited), (1484, 1495 Pigeon Capital Management Ltd). The Council do not consider it appropriate to add a 20% uplift to the housing requirement, as this (in Policy SCLP3.1) is derived from the Government’s standard methodology. Paragraph 3.39 of the Final Draft Local Plan shows that the Council has identified a contingency of 8.5% which is approximately 890 additional dwellings over the plan period. The Council believe that the level of contingency follows best practice and is appropriate for the District and ensures delivery of sustainable development without identifying land that is not needed or would place further pressure on infrastructure and services. Add info about change in housing numbers from standard methodology.

10. Hopkins Homes Limited and Hopkins & Moore Limited (Rep ID: 1245) outline that the plan relies on a number of large sites which are unlikely to comply with the delivery tests in the National Planning Policy Framework (Document C1). The Council have identified Garden Neighbourhoods in Felixstowe and Saxmundham and these make up a large proportion of the development expected over the plan period. However, the Council is confident that these sites are deliverable and developable over the plan period and will create positive additions to the existing communities and ensure sustainable development over the plan period.
11. As identified in the Key Issues, page 7 of the Final Draft Local Plan (Document A1), the District’s population is older than the county, regional and national averages. A number of representations received against this policy (885 MS Oakes, 1214 Christchurch Land and Estates Limited, 1320 M Scott Properties Ltd) call for greater provision in the Council’s strategy for accommodation to meet these specific needs. The Council acknowledge this specific local characteristic and have included requirements in individual site allocation policies found in Chapter 12 of the Final Draft Local Plan. The provision of accommodation to meet the needs of the older population is part of the overall housing need for the District and should be delivered alongside other forms of accommodation to achieve mixed and inclusive communities, community integration and sustainable development.

12. Representations have identified the potential unmet housing need from Ipswich Borough and other neighbouring authorities. Those received (980 Grainger PLC, 991 Gladman Developments, 1245 Hopkins Homes Limited and Hopkins & Moore Limited, 1476 and 1517 Bloor Homes Eastern, 1484 and 1495 Pigeon Capital Management 2 Ltd) reference that Policy SCLP3.1 should include consideration of the potential for unmet need from neighbouring authorities to be provided within the District. The Council consider this inappropriate as throughout the plan making stage, neighbouring authorities have not requested that East Suffolk Council (or the former Suffolk Coastal District Council) provide dwellings to meet any unmet need. The authorities across the Ipswich Strategic Planning Area (ISPA) have all committed to meeting their own housing needs within their local planning authority areas as detailed in the ISPA Statement of Common Ground (Document A13).

Question 2.18

Is the identification of settlements as set out in the Settlement Hierarchy in Policy SCLP3.2 justified?

13. The Council consider that Policy SCLP3.2 is justified as it supports the delivery of the overall strategy for growth outlined in Policy SCLP3.1 of the Final Draft Local Plan (Document A1). As outlined in paragraphs 3.40- 3.45 of the Plan, the Settlement Hierarchy is a policy tool for managing the spatial distribution of development whilst taking into account the availability of services and facilities of each settlement. The settlement hierarchy is therefore a key to the delivery of sustainable development.

14. Policy SCLP3.2 has been informed by a robust and comprehensive assessment of services and facilities within settlements. As set out in paragraph 3.44 of the Final Draft Local Plan this included consideration of the following:

- Convenience stores
- Primary schools
- Village halls/community centres
- Play areas
• Employment opportunities
• Medical facilities
• Public transport and
• For villages, proximity to a major centre or town

15. The methodology and results of the assessment were set out in the Topic Paper: Settlement Hierarchy (First Draft Local Plan) (Document D35) which was published alongside the First Draft Local Plan. Following receipt of consultation responses this was amended and republished (Document D34) alongside the Final Draft Local Plan.

16. The approach in policy SCLP3.2 is in accordance with National Planning Policy Framework (Document C1). The NPPF is clear in paragraph 7 that “the purpose of the planning system is to contribute to the achievement of sustainable development.” Furthermore, paragraph 103 of the NPPF states that the planning system should “actively manage patterns of growth” to support the objective of promoting sustainable transport.

17. The NPPF in paragraph 78 also encourages the delivery of housing where it will enhance or maintain the vitality of rural communities. The Local Plan seeks to encourage development in those locations where services can be accessed by sustainable modes of transport. In identifying smaller settlements as part of the hierarchy, policy SCLP3.2 recognises that in more rural parts of the District sustainable transport may be more limited but that some smaller scale development may help sustain these communities.

Question 2.19
Is the distribution of housing development as set out in table 3.5 justified and is it consistent with national policy for the achievement of sustainable development?

18. Table 3.5 in the Final Draft Local Plan is the representation, by Parish, of the strategy and distribution set out in the Plan for housing growth, including existing commitments as at 31st March 2018 and new growth planned for in the Local Plan.

19. Table 3.2 identifies the existing commitments, being outstanding planning permissions, resolutions to grant planning permission and allocations in the current adopted Local Plan and the Neighbourhood Plans, and identifies a residual figure to be planned for through new locations identified in the Final Draft Local Plan.

20. The Council has considered options for the strategy within the Local Plan and the approach towards this, in terms of how it relates to site allocations and numbers identified for designated Neighbourhood Plan areas, is set out within the Site Selection Topic Paper (December 2018) (Document D36, paragraphs 3.1 – 3.6). The Sustainability Appraisal has assessed options for the strategy of the Plan which has also informed selection of the

21. As explained throughout the Site Selection Topic Paper (December 2018) (Document D36, pages 2-3 and 8-12), the selection of individual sites for allocation for housing, to take forward the strategy of the Local Plan, has been informed by a number of considerations including the Strategic Housing and Economic Land Availability Assessment, consultation responses, the Sustainability Appraisal and infrastructure capacity.

22. Paragraphs 7-14 of the NPPF sit under the heading ‘Achieving Sustainable Development’. Paragraph 8 identifies three overarching objectives – economic, social and environmental. The approach to the distribution of housing supports economic objectives in terms of focusing growth on the A12 and A14 corridors, which are identified in paragraphs 1.29 and 1.30 of the Final Draft Local Plan as being key connections within Suffolk Coastal and beyond. Directing site allocations to those locations that have sufficient range of services and facilities to be identified as major centres, market towns, large villages or small villages, will help to support both economic and social objectives through providing opportunities for new housing to support businesses and local services such as schools. This approach is consistent with paragraph 78 of the NPPF which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

23. Environmental considerations have formed part of the site selection process, as considered through the Strategic Housing and Economic Land Availability Assessment (Document D10), the Sustainability Appraisal Report (Document A2) and through evidence as outlined in the Site Selection Topic Paper (December 2018) (Document D36). The site allocation policies themselves include criteria, where appropriate, relating to protecting and enhancing environmental assets including the natural environment, built and historic environment and the landscape. Through focusing housing growth on those locations which have a sufficient range of services and facilities to be identified as major centres, market towns, large villages or small villages, the distribution seeks to reduce the need to travel which will contribute towards mitigating climate change. The site allocations process has also sought to make effective use of land through the approach to densities, whilst ensuring this is appropriate to the character of the location, and through allocating previously developed land where appropriate.

24. The approach to housing distribution is therefore justified and is consistent with national policy for the achievement of sustainable development.

25. Since publication of the Final Draft Local Plan, the Council has identified a small number of figures in the table that need to be corrected, as set out below:
Table 3.5, Woodbridge row – column A+B additional modification ‘103336’, column D additional modification ‘323 (3%) 556 (4.9%)’

**Question 2.20**

Would the Plan as drafted be sufficiently flexible to adapt to rapid change as set out in paragraph 11 of the Framework and would the definition of Settlement Boundaries through Policy SCLP3.3 be effective in meeting the objectively assessed needs for housing and other uses?

26. Paragraph 11 of the National Planning Policy Framework (Document C1) relates to the presumption in favour of sustainable development, and states that in relation to plan making ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’ This should be viewed alongside paragraph 15 of the National Planning Policy Framework which states that the planning system should be genuinely plan led. The Council has therefore sought to provide certainty for communities and developers through the production of the Plan whilst also incorporating an element of flexibility.

27. The preparation of the Local Plan is underpinned by a robust evidence base covering a range of topics and specialisms and which has informed the development of policies. Where evidence has been produced in relation to needs for housing, the economy and retail and commercial leisure, consideration has been given to recent and current trends and likely future changes and demands. However, it is acknowledged that it is not possible to predict with complete certainty the changes that may take place over the period to 2036.

28. In relation to housing, the Plan contains a variety of housing allocations aimed at significantly boosting the supply of housing. This includes two new Garden Neighbourhoods at Saxmundham and Felixstowe, along with a range of medium sized and smaller allocations across the plan area, including allocations on both greenfield and previously developed sites. The Plan also sets out a contingency on top of the housing requirement to provide additional certainty that the housing need can be provided for should any sites be delayed or not come forward. This would provide some flexibility to react to, for example, changes in the construction industry. The Local Plan also sets out a range of development management policies which would support housing development in Settlement Boundaries or in the countryside where appropriate, as set out in Chapter 5 of the Final Draft Local Plan.

29. The Council acknowledges that a representation (Rep ID: 1023 and 1024) raises concerns that there is insufficient flexibility to respond to rapid change should the housing planned for not be delivered, however the Council is confident that there is a sufficient variety of sites to ensure that the strategy of the Plan can be delivered. The Delivery Framework in the Final Draft Local Plan (Document A1, Appendix A, page 414), identifies a potential scenario within
which sites do not come forward or needs change, however recognises the role of the housing Action Plan in identifying ways in which issues can be addressed should they arise.

30. In relation to the economy, Policy SCLP3.1 seeks to plan for significantly more than the baseline requirement of 11.7ha of land. The Plan includes three new employment allocations, at Innocence Farm (67ha under Policy SCLP12.35 for port related businesses and operations), Land at Felixstowe Road, Nacton (22.5ha under Policy SCLP12.20 for B1 and B2 uses) and to the west of the A12 at Saxmundham (under Policy SCLP12.29 for employment uses, to be delivered as part of the South Saxmundham Garden Neighbourhood). Alongside this the protection of existing employment areas and allocations, and development management policies to guide economic development including in the rural areas (as set out in Chapter 4 of the Final Draft Local Plan), the Plan provides flexibility to support a range of economic sectors.

31. In relation to retail and town centre uses, paragraph 3.18 of the Final Draft Local Plan recognises that the retail sector is characterised by rapid change and changing consumer demands. Paragraph 4.51 of the Final Draft Local Plan identifies that the capacity to grow floorspace in Suffolk Coastal is modest. Therefore, and accepting that there are limited opportunities for retail development the Council’s approach is to support and monitor retail and town centre development which is supported by policies set out in Chapter 4 (in particular SCLP4.8 New Retail and Commercial Leisure Development and SCLP4.9 Development in Town Centres).

32. Rapid change could also relate to environmental factors, for example climate change and coastal erosion. The preparation of the Local Plan has been informed by Strategic Flood Risk Assessment which has factored in anticipated future flood risk as a result of climate change. Policy SCLP9.3 recognises the vulnerability of the coastline to erosion and this would be a consideration in the determination of planning applications for proposals close to the coast. Policy SCLP9.4 provides an approach to support appropriate relocation and replacement of uses affected by coastal erosion.

33. In addition to the flexibility provided above, the Council is required, under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to complete a review of the Local Plan every five years. This would enable any changes which are so significant as to result in a change in focus of the strategy of the Local Plan to be addressed.

34. Policy SCLP3.3 Settlement Boundaries sets out the approach which supports the principle of development within Settlement Boundaries. The strategy for meeting identified needs for housing and other uses is provided through the Plan as a whole, including site allocations and development management policies, in accordance with the strategy set out in Policy SCLP3.1, and is therefore not solely reliant on the definition of Settlement Boundaries. As the strategy of the Local Plan has sought to identify new allocations for housing in locations which are sustainable (as explained in the Site Selection Topic Paper, Document D36) many of these are
adjacent to existing Settlement Boundaries and the boundary has therefore been extended to incorporate new allocations. There are circumstances where appropriate locations for growth have been identified which are not adjacent to Settlement Boundaries. The Council would support modifications to Policy SCLP3.3 in order to clarify this position as set out below.

“Settlement Boundaries are defined on the Policies Map and apply to Major Centres, Market Towns, Large Villages and Small Villages. Land which is outside of Settlement Boundaries and which isn’t allocated for development in the Local Plan and Neighbourhood Plans is defined as Countryside.

New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.

New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.

Proposals for new residential development outside of the Settlement Boundaries and outside of land which is allocated for development will be strictly controlled in accordance with national planning policy guidance and the strategy for the Countryside.”

Neighbourhood Plans can make minor adjustments to Settlement Boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall strategy and distribution as set out in this Local Plan.

Table 3.1 Strategic Policies

Question 2.21

Is the identification of strategic policies in Table 3.1 consistent with national policy as set out in paragraphs 20 to 30 of the Framework?

35. The Local Plan is considered to be a strategic plan for Suffolk Coastal dealing with strategic priorities of the Council in terms of land-use, development and regeneration. The policies of the Plan as a whole set out the strategy for the pattern, scale and quality of development, as established in Paragraph 20 of the NPPF. Table 3.1 of the Plan details the strategic priorities and the strategic policies of the Plan which help to cumulatively deliver these priorities, which is in line with Section 19(1B) and (1C) of the Planning and Compulsory Purchase Act 2004 and paragraph 21 of the NPPF. To do otherwise would run the risk that objectively identified development needs are not met or that non plan-led development would need to be approved. As all policies are considered strategic, this gives those undertaking Neighbourhood Plans clarity about which policies they need to be in general conformity with.
To further aid this many of the policies of the Local Plan give specific guidance for Neighbourhood Plans, including where they can take a different approach to some of the policy requirements.

36. The Council has prepared a Statement of Common Ground (Document A13) with neighbouring authorities in the Ipswich Strategic Planning Area as required in paragraph 27 of the Framework (Document C1). The Statement of Common Ground focuses on strategic cross boundary matters and outlines agreements and outcomes in relation to these strategic matters within the requirements of the Duty to Co-operate. Neighbouring authorities have participated in the preparation of the Suffolk Coastal Final Draft Local Plan (Document A1) through the production of the Statement of Common Ground and representations submitted. Within this participation no issues in respect of the identification of strategic policies have been raised by neighbouring authorities.
## Suggested Modifications

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<th>Paragraph / Policy</th>
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<tr>
<td>2C.1</td>
<td>Table 3.5 (MIQ 2.19)</td>
<td>Amend Table 3.5 as follows: Woodbridge row – column A+B additional modification “103336”, column D additional modification “323 (3%)556 (4.9%)”</td>
<td>To correct error in table.</td>
<td>N/A</td>
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| 2C.2             | Policy SCLP3.3 (MIQ 2.20) | Amend SCLP3.3 to read: “Settlement Boundaries are defined on the Policies Map and apply to Major Centres, Market Towns, Large Villages and Small Villages. Land which is outside of Settlement Boundaries and which isn’t allocated for development in the Local Plan and Neighbourhood Plans is defined as Countryside.

New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.

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Proposals for new residential development outside of the Settlement Boundaries and outside of land which is allocated for | To clarify that there are allocations outside of Settlement Boundaries and that development would be acceptable in those locations. | N/A |
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