Gladman

Matter 2
The Suffolk Coastal Spatial Strategy

East Suffolk Council
Examination of the Suffolk Coastal Local Plan

August 2019
A. Housing Provision

Issue: Is the overall strategy and provision for housing development effective and justified?

Calculating the housing need

2.4 The Plan seeks to provide for a contingency above the minimum housing need requirement. What is the overall provision for contingency (including the windfall allowance and contributions from Neighbourhood Plans) proposed and is it justified?

2.4.1 As set out in our response to the Regulation 19 version of the Local Plan at Section 4.7, a meaningful contingency of 20% is considered necessary to ensure that the housing requirement can be achieved over the plan period.

Scale and location of growth

2.5 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.5.1 Policy SCLP2.1 confirms several strategic planning priorities that have been established for the area through collaboration between local authorities and therefore has a clear purpose within the Local Plan. However, in its present form, Policy SCLP2.1 is not effective when read alongside Policy SCLP3.1. This is because together, they fail to provide a mechanism which will ensure that the housing needs of the area will be met in full over the plan period and that will ensure that wider than local infrastructure priorities that have been identified will be progressed. As discussed in our Matter 1 Statement, this is particularly important because the latest Ipswich Local Plan review has yet to be examined and the level of unmet housing need has therefore yet to be determined. The need to support the prospects of delivering wider than local infrastructure priorities is also an important factor and needs to be a central influence on whether the spatial strategy for Suffolk Coastal is appropriate, in particular with regard to the need to fully support Ipswich in its role as County Town by enabling development that has the ability to support infrastructure improvements in this area and ensure that its housing needs are planned for in full.

2.5.2 In order for the Policy to be considered effective, modifications will be required that explain the important inter-relationships between Policy SCLP2.1 and SCLP3.1 and to ensure that they are acted upon over the course of the plan period. This includes:
• the need for effective mechanisms to support the delivery of strategic infrastructure that has been identified; and,

• the need to confirm through policy, the role that Suffolk Coastal / East Suffolk must play in supporting Ipswich Borough in meeting its element of the housing requirement over the plan period.

2.5.3 The following modifications are recommended:

Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area

Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:

a) The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;

b) The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and

c) Supporting the continued role of Ipswich as County Town.

This will be achieved through the delivery of the requirements set out in Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District.

The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary through its Annual Monitoring Report. In the event that unmet housing needs are identified within the Ipswich Local Plan, the Council will address this through:

i. The commencement of a partial or full update of this Local Plan within 6 months of the adoption of the Ipswich Local Plan (commencement will be defined as the publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012;

ii. The full or partial Local Plan update will be submitted for examination within 24 months from the date that it is commenced.
2.5.4 Gladman also remain concerned that Policy SCLP3.1 does not adequately reflect and address the wider strategic infrastructure requirements that have been determined through joint working across the ISPA and consider that it will also require modification in order to ensure that it is positively prepared and effective. Gladman have proposed revised wording for Policy SCLP3.1 in response to Question 2.17 below. It is also notable that whilst the Plan’s monitoring framework at Appendix A identifies a number of circumstances whereby an early review of the Plan will be necessary, it fails to reflect the need for a review as a result of unmet housing needs being established in Ipswich, or as a result of the need to plan for strategic infrastructure (which the Council is committed to, as expressed through paragraphs 2.16 and 2.17 of the Plan).

**Housing needs**

2.7 Given historic levels of housing completions in the Plan area, are numbers of units to be built envisaged per annum realistic and achievable?

2.7.1 Yes, recent annual housing completion rates in Suffolk Coastal\(^1\) demonstrate that the annual housing requirement is realistic and achievable. The requirement can be achieved by ensuring that the plan provides sufficient land for new housing through its allocations and by ensuring that flexibility and contingency mechanisms are included within policy wording to ensure that a rapid response is made towards addressing any supply issues that might arise over the plan period (including the need to respond to unmet needs arising from neighbouring authorities).

2.8 Is the rate of delivery envisaged for the proposed allocations as set out in the trajectory realistic and justified?

2.8.1 Clear evidence is required to inform any assumptions that are made within the trajectory in relation to strategic sites. Lead in times and delivery rates for all of the strategic sites within the trajectory should be informed by historic local evidence of delivery from such sites, taking into account regional and national evidence where appropriate (such as that contained within Lichfields ‘Start to Finish’ Report and Savills “Spotlight: Planning and Housing Delivery Report). The Savills Report, dated May 2019, indicates the following from research on annual completion rates from sites of 500 or more dwellings:

“Our latest analysis covers 41 large greenfield sites with capacity for at least 500 homes. These are located across England, Scotland and Wales, in markets of varying strength. We have tracked annual completions,

\(^1\) See Table 4 (page 24) of the Suffolk Coastal Annual Monitoring Report 2017/18
covering open market sales, purpose-built rental stock and affordable housing tenures.

The average delivery rate from these sites is 145 homes per year, but there is a wide variation around this average. So, while 30% of the sites deliver more than 175 homes per year, three have delivered at more than double the average rate. Six sites, however, have delivered at less than half the average rate.”

Fig 1: Delivery rates Distribution of completions (all tenures) on sites with capacity of more than 500 homes

Source: Savills Research

2.8.2 A number of key factors must be considered in determining lead in times and build out rates and specific evidence provided to justify this. Consideration must be given to:

- Land assembly and associated promotion and option agreements
- The agreement of collaboration and equalisation agreements
- Periods associated with the exercising of option agreements
- The requirement for Environmental Statements at the planning application stage resulting in the involvement of third-party consultees (such as Highways England and Natural England)
- The complexity of s106 agreements where a significant number of service providers and infrastructure bodies are involved. Furthermore, multiple land ownership within strategic sites will result in the need for agreement between and sign off from multiple agents and solicitors which can take a significant length of time to achieve
- The need for enabling infrastructure works, which are often complex and require completion before initial dwellings can be constructed and occupied
- Developers and builders requiring time at each stage to secure the necessary board level agreements and share-holder approvals to support any large capital expenditure. It is not always realistic to assume that a number of aspects within the lead in period can be progressed in parallel

2.9  The housing trajectory assumes provision of 50 dwellings per annum by way of windfalls. What is the justification for this figure and is it realistic for the duration of the plan period?

2.9.1 Paragraph 70 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.

2.9.2 The evidence underpinning the proposed windfall allowance in Suffolk Coastal of 50 dwellings per year from 2020/21 is unclear and further information is required to test whether there is compelling evidence to justify this rate of delivery moving forwards. Consideration should be given to past windfall rates, together with the impact that the new local plan will have on the availability of such sites coming forward over the plan period. Care must also be taken to ensure that sites in the early years after adoption have not already been included within the commitments contained in the ‘outstanding planning permissions’ column’ this is certainly likely to be the case for completions that are expected in the 2020/21 monitoring year.
C. Distribution of Growth and the Settlement Hierarchy

Issue: Whether the Plan sets out a clear strategy for the pattern of development consistent with national policy?

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

2.17.1 As discussed in relation to Question 2.4, Gladman has concerns regarding the manner in which the strategic policies for the wider IPSA have been reflected through the proposed spatial strategy for Suffolk Coastal and Policy SCLP3.1.

2.17.2 SCLP3.1(c) fails to include a mechanism to ensure that a rapid response can be made once the quantum of unmet need arising from Ipswich Borough over the plan period has been determined. Furthermore, SCLP3.1(d) must reflect the need to provide infrastructure associated with the growth of the wider area as articulated through Policy SCLP2.2. SCLP3.1(c) and SCLP3.1(d) therefore require modification to ensure that they are positively prepared and effective.

2.17.3 An updated or replacement Local Plan will need to be submitted in order to address the infrastructure requirements set out in Policy 2.2 and/or in the event that the emerging Ipswich Local Plan identifies unmet needs once adopted, which would need to be addressed within its neighbouring authorities.

Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal by:

a) Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;

b) Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sqm of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;
c) Significantly boosting the supply of housing, the mix of housing available and
the provision of affordable housing, through the delivery of at least 582 new
dwellings per annum (at least 10,476 over the period 2018 - 2036) and updating
its Local Plan in accordance with the requirements of Policy SCLP2.1 in the
event that unmet housing needs are identified in the Ipswich Local Plan;

d) Ensuring the provision of infrastructure needed to support growth, including
the strategic infrastructure priorities for the wider area identified in Policy
SCLP2.2;

e) Protecting and enhancing the quality of the historic, built and natural
environment across the District. The strategy for growth will seek to provide
opportunities for economic growth and create and enhance sustainable and
inclusive communities through

f) The delivery of new Garden Neighbourhoods at North Felixstowe and South
Saxmundham;

g) Utilising opportunities provided by road and rail corridors, including a focus
on growth in the A12 and the A14 corridors;

h) New strategic employment allocations based around key transport corridors,
including to support the Port of Felixstowe;

i) Strategies for market towns which seek to reflect and strengthen their roles
and economies;

j) Appropriate growth in rural areas that will help to support and sustain existing
communities.

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

2.18.1 No. The Local Plan is predicated on addressing wider than local issues over the plan period,
as set out through policies SCLP2.1, SCLP2.2 and SCLP2.3. Despite this, the local approach to
determining the settlement hierarchy fails to fully recognise the role of Ipswich as County
Town (which is a role that must be supported over the plan period in accordance with Policy
SCLP2.1).

2.18.2 The area to the East of Ipswich is identified as a major centre and is proposed to be at the
same level as Felixstowe. This is not a justified position and needs to be amended to properly
reflect the position of Ipswich as County Town and operating at a tier above Felixstowe. In addition to this, whilst a number of parishes are listed as being East of Ipswich communities (Kesgrave, Martlesham Heath, Brightwell Lakes, Purdis Farm and Rushmere St Andrew), the list omits Foxhall despite its location to the immediate east of Ipswich. This is an anomaly that should be corrected.

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?**

2.19.1 There is a need to reassess the distribution of development within the proposed allocations of the Plan. This is required because the strategic priorities of the area are to support the role of Ipswich as County Town and to deliver significant infrastructure improvements to support this (such as the Ipswich Northern Route and at key junctions on the A12 and A14).

2.19.1 Paragraph 8 of the Framework explains the overarching economic, social and environmental objectives of achieving sustainable development. The economic objective is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; **and by identifying and coordinating the provision of infrastructure** (our emphasis added)

2.19.2 The current strategy fails to positively respond to the achievement of sustainable development. The opportunity exists now to positively plan for the delivery of identified infrastructure through the identification of additional levels of growth in the District’s most sustainable location at the East of Ipswich. The identification of additional strategic scale development in this area will have the ability to deliver homes from the mid years of the plan period and in doing so support the economic case for additional infrastructure investment. The distribution and location of development that is currently proposed fails to respond to the wider than local infrastructure priorities that have been identified through collaborative working and should therefore be re-visited. It is noted from the Plan’s SA² indicates that the next review of the Local Plan will provide an opportunity to consider route options for the Ipswich Northern Route in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth. Given the strategic importance of the route (as set out through it being identified in Policy SCLP2.2), strategic development proposals to the East of Ipswich that are able to support this should be

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considered and planned for now, or at the very least, there should be a clear policy commitment within the Suffolk Coastal Local Plan to review and update the Local Plan in a timely manner to address this issue. Having identified this strategic infrastructure through the policies of the Plan, a clear and positive route is required to ensure its provision in line with paragraph 8 of the Framework.

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?

2.20.1 No. As currently drafted, the plan does not include sufficient flexibility to respond to rapid change. This can be addressed (in part) through the proposed modifications to Policy SCLP2.1 and SCLP3.1 that Gladman have set out in response to the earlier questions above. The mechanisms identified by Gladman would ensure that the Local Plan is updated in a timely manner in the event that unmet needs are identified in the Ipswich Local Plan.

2.20.2 The Local Plan must also grapple with how any smaller scale shortfalls in delivery might be addressed over the course of the plan period in the event that predicted completions at the allocated strategic sites do not come forward at the rate that has been anticipated in the current version of the housing trajectory.

2.20.3 Policy SCLP3.3 indicates that development in the countryside (which could in effect be highly sustainable locations at the settlement edge) will be “strictly controlled in accordance with national planning policy guidance and the strategy for the Countryside”. However, this is a misinterpretation of national planning policy, which does not apply ‘strict control’ and instead operates a presumption in favour of sustainable development. The Framework requires local plans to recognise the intrinsic character and beauty of the countryside, but does not seek the strict control of development in the manner that is suggested by Policy SCLP3.3. A criteria based policy to allow the consideration of sustainable forms of development at the settlement edge is required, this will be a particularly important mechanism for decision making in the event that monitoring shows that a five year housing land supply is unlikely to be maintained, as it would allow a rapid response to be made as required by Paragraph 11 of the Framework. A corresponding change would also be required to Policy SCLP 5.3 to recognise the circumstances whereby sustainable proposals for residential development can be brought forward beyond the settlement boundaries.

2.20.4 Gladman would recommend the following modifications to Policy SCLP 3.3 and Policy SCLP5.3:
Policy SCLP3.3: Settlement Boundaries

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 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 will be strictly-controlled permitted in accordance with national planning policy guidance and Policy SCLP5.3: Housing Development in the Countryside—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.

1. The site is allocated for residential development; or

2. The proposal is for the re-use of buildings in the countryside in

Policy SCLP5.3: Housing Development in the Countryside

Outside of the defined Settlement Boundaries, new residential development will be limited to:

a) Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);

b) Limited development within existing clusters (in accordance with Policy SCLP5.4);

c) Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;

d) Subdivision of an existing larger dwelling;

e) Conversion of an existing building (in accordance with Policy SCLP5.5);
f) Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);

g) Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework.

h) Locations that are well related to a settlement and its settlement boundary where:

i. the proposal is for a scale of development that will not have a negative impact on the character of the settlement and the capacity of infrastructure and services within the settlement; and

ii. the proposal is within a reasonable safe walking distance of services (such as school and shop) or is within reasonable safe walking distance of a public transport stop providing access by public transport to services; and

iii. the proposal recognises the intrinsic character and beauty of the countryside and does not adversely affect environmental assets unless these can be suitably mitigated in line with other policies in the Plan.

F Infrastructure

Issue: Does the Plan make sufficient provision for infrastructure?

Policy SCLP2.2: Strategic Infrastructure Priorities

2.35 Would the policy be effective in dealing with cross boundary strategic infrastructure issues? Does the policy serve a clear purpose in seeking to support and enable infrastructure provision outside of the plan area and is it justified?

2.35.1 The policy plays an important role in setting out the infrastructure requirements associated with the growth of Suffolk Coastal and the wider area over the plan-period as agreed through the ISPA Board, working under the Duty to Cooperate. Several of the infrastructure proposals (and their associated benefits) relate to and extend across local authority boundaries and will have an influence on the spatial development of the wider area over the plan period.

2.36 Is criterion j) consistent with national policy as set out in paragraph 170 of the Framework in regard to net gains in biodiversity?

2.36.1 No comments