Suffolk Coastal District Council Local Plan Examination

Matter Statement 2
The Suffolk Coastal Spatial Strategy

Response on behalf of Pigeon Capital Management 2 Ltd and their Landowners

August 2019
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Appendix 1: Regulation 18 Representations to Ipswich Borough Council Local Plan Consultation 11

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**Client**
Pigeon Capital Management 2 Limited

**Our reference**
PIGC3010 & PIGC3011
1. **Introduction**

1.1 This Hearing Statement has been prepared by Turley, on behalf of Pigeon Capital Management 2 Ltd (‘Pigeon’) and their Landowners, in respect of their land interests SCLP12.29 South Saxmundham Garden Neighbourhood and SCLP12.66 Land Adjacent to Reeve Lodge, Trimley St Martin pursuant to Matter 2 (The Suffolk Coastal Spatial Strategy) of the Suffolk Coastal Council Local Plan Examination.

1.2 Turley has previously submitted representations in response to the Council’s Issues and Options Consultation in August 2017, the First Draft Local Plan in September 2018 (Regulation 18) and the Final Draft of the Plan in February 2019 (Regulation 19) consultations.

1.3 The Landowners have entered into a partnership with Pigeon to process the sites through the planning process. Pigeon specialise in bringing together teams of leading designers and specialist advisors to deliver high quality residential and mixed-use sustainable communities. Pigeon is working with a number of landowners across Suffolk and the East of England to deliver high quality schemes. Pigeon’s experience demonstrates that it has a proven track record of planning and delivering high quality mixed-use sustainable schemes.

1.4 Through representations to the Local Plan consultations, Pigeon and their Landowners have demonstrated that their sites (SCLP12.29 and SCLP12.66) are deliverable, suitable, and achievable. Whilst the Council do not rely on these sites to deliver within the first 5 years of the housing trajectory, Pigeon consider that the trajectory is conservative and as set out in their Matter 3 Statements for individual sites, it is feasible that these sites could start to deliver homes in 2022/23.

1.5 Pigeon continue to support the thrust of the emerging Local Plan as a whole, but advocate a number of changes to ensure that the Plan can be found ‘sound’. Furthermore, this is to help the Council meet its aspirations to ‘significantly boost the delivery of housing’ as set out in the National Planning Policy Framework (the Framework) (2019).

1.6 Pigeon has requested the right to participate in the relevant Matter 2 Hearing Session to further articulate the issues raised in this Hearing Statement.
2. **Part A – Housing Provision**

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

*Calculating the housing need & scale and location of growth*

*Questions 2.1, 2.2, 2.3 and 2.4*

2.1 In response to questions 2.1 and 2.2, and as set out in the representations submitted to the Regulation 19 Consultation (Feb 2019), Pigeon is generally supportive of Policy SCLP2.1 which sets out an annual housing need of 582 dpa between 2018 and 2036 resulting in a total housing need of 10,476 over the Plan period.

2.2 The Government committed as part of the Autumn Budget 2017 to deliver 300,000 homes per year, on average, by the mid-2020s. To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in national planning guidance. However, it is recognised that in order to deliver the Governments targets some authorities will need to provide for a greater housing need and be ambitious with their targets.

2.3 According to the annual statistics published by MHCLG, 165,090 new-build homes were completed in the year ending December 2018. This falls significantly short of the 300,000 target. The Government has also committed to review the standard method over the next 18 months with a view to “establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government’s aspirations for the housing market.” In view of the Governments objective of significantly boosting the supply of homes, the proposed housing target set out within the Final Local Plan of 582 dpa is considered ‘justified’ in Pigeons view.

2.4 Fundamentally, the objective is to enable the delivery of 300,000 homes per annum and therefore the ambition of the Council to deliver more housing than their minimum need should be commended as they are recognising that for this authority, the 2014 projections require a lower housing need than the 2016 projections. By using the higher figure, the Council are seeking to boost the supply of housing which reflects one of the principle aims of the Framework within Paragraph 59.

2.5 In response to question 2.3, it is noted that the Plan seeks to provide an 8.5% contingency above the minimum housing need requirement. However as set out in our representations to the Final Draft Local Plan it is considered more appropriate that a 20% contingency be applied to the housing figure. This is justified by the low level of completions within the District over the past three years with housing delivery ranging from 72% in 2015/16, 79% in 2016/17 and 85% in 2017/18 based on the Core Strategy target of 465 dpa as shown within the Council’s Authority Monitoring Report (AMR) (Mar 2019).

2.6 Given the emerging unmet need for Ipswich, and the requirements of the Framework within Paragraph 35, there exists an opportunity for Suffolk Coastal, as the most
sustainable and deliverable location in the Housing Market Area (HMA) to accommodate Ipswich’s housing shortfall. This is recognised in the Memorandum of Understanding (June 2016) between Babergh, Mid Suffolk, Suffolk Coastal, Ipswich and Suffolk County. The Memorandum seeks to commit the Council’s to working with their neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans. Ipswich’s shortfall has been acknowledged and discussed in detail within Pigeon’s response to the Ipswich Borough Council Regulation 18 consultation which is attached at Appendix 1. In addition, Pigeon’s concerns with the strategic cross boundary issues are discussed further in the response to Part C of this Statement ‘Distribution of Growth and the Settlement Hierarchy’.

2.7 In answer to question 2.4, Pigeon is generally supportive of Policy SCLP2.1, however, accordingly, the housing target for Suffolk Coastal should be elevated to include a 20% contingency resulting in 698 dpa and 12,564 homes over the Plan period. This is to ensure that there is sufficient flexibility to adapt to any rapid change and ensure that the Council will maintain a five year housing land supply throughout the Plan period.

Housing Needs

Question 2.5

2.8 Pigeon consider that the Plan adequately addresses the needs of different groups in the community as set out in Paragraph 61 of the Framework. Both SCLP12.29 and SCLP12.66 include affordable housing, housing for older people such as bungalows, smaller sized properties for first time buyers and those wishing to downsize, homes built to Lifetime standards and capable of adaption and self-build plots. However, as noted within para 2.14 in the representations to the Final Draft of the Local Plan, Pigeon is concerned with the draft wording relating to part (a) of the policy. This requires that ‘A mix of housing should be provided on the site including housing for older people and the provision of self-build plots’. Pigeon is concerned that the requirement for ‘housing for older people’ is not clearly defined.

2.9 Recent changes to the PPG are relevant to this question and are important for the Council to consider. Paragraph 63-013 of PPG states that it is up to the plan making body as to whether to allocate sites for such development but where it does it is important to recognise that allocated sites should be in proximity to good public transport, amenities, health services and town centres.

The supply of housing and housing trajectory

Questions 2.6, 2.7 and 2.8

2.10 In response to questions 2.6 and 2.8, Pigeon consider that there will be a supply of deliverable housing sites on adoption of the Plan. Pigeon is highly supportive of the identification of SCLP12.29 South Saxmundham Garden Neighbourhood and SCLP12.66 Land Adjacent to Reeve Lodge, Trimley St Martin. Pigeon believe the proposed allocation of these sites is fully justified and it has been demonstrated that they are deliverable, suitable and achievable. Whilst the Council do not rely on these sites to deliver within the first 5 years of the housing trajectory, Pigeon consider that the trajectory is
conservative and as set out in their Matter 3 Statements for individual sites, it is feasible that these sites could start to deliver homes in 2022/23.

2.11 In response to question 2.7, Pigeon consider that the number of units to be built per annum is realistic and achievable. Pigeon is supportive of the projected early delivery of housing taking into consideration the Government’s aim of significantly boosting the supply of housing. Pigeon maintain that South Saxmundham Garden Neighbourhood and Land Adjacent to Reeve Lodge, Trimley St Martin will make a significant contribution towards Suffolk Coastal’s housing targets.
3. **Part B – Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers**

*Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers?*

*Questions 2.10 & 2.11*

3.1 The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for the Housing Market Area (HMA) identifies over the Plan period that 15 permanent pitches are required for Gypsies and Travellers.

3.2 As the existing population of travellers in the Suffolk Coastal area reside on two unauthorised sites which provide 10 pitches, the remaining need unaccounted for as set out in the ANA is 5 permanent pitches. The ANA concludes that these 5 pitches will relate to new family formations expected to arise from the existing family units on the unauthorised sites.

3.3 Given that family connections are the foundation for settled travellers, it would be appropriate in this situation to either allow the pitches to come forward as windfall sites or to allocate the pitches within the area where the Gypsies and Travellers have already settled.
4. Part 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?**

*Questions 2.17, 2.18, 2.19 and 2.20*

4.1 In response to question 2.17, the strategy for growth as set out in Policy SCLP3.1 states that the Council will deliver an ambitious Plan for growth with a significant boost for housing. The Policy sets a target of minimum of 10,476 homes throughout the Plan period 2018-2036.

4.2 As documented in the representations to the Final Draft of the Local Plan, Pigeon supports Policy SCLP3.1 and the Council’s aspirations for ambitious growth which is in line with the Framework and the PPG. As part of the Policy and key to boosting the supply of homes, Pigeon particularly supports the identification of the two new Garden Neighbourhoods, specifically the South Saxmundham Garden Neighbourhood. In addition, the spatial strategy for growth includes a full spectrum of housing sites within the trajectory at Appendix D of the Draft Local Plan. These comprise of schemes that will deliver within the first five years, intermediate and smaller sites spread throughout the plan period and those larger sites which will deliver throughout the Plan, particularly at the end.

4.3 The Sustainability Appraisal (SA) has assessed both the South Saxmundham Garden Neighbourhood and Land Adjacent to Reeve Lodge, Trimley St Martin sites against the SA objectives and concluded that both Saxmundham and Trimley St Martin are sustainable locations for growth and allocated the sites for residential development. The development of these two sites is in accordance with the spatial strategy.

4.4 As noted within the response to Part A of this Statement, there is a concern from Pigeon that the Plan as currently drafted fails to consider the authority’s position within the wider Ipswich Housing Market Area (IHMA) and address the strategic cross boundary issues for sustainable growth.

4.5 Pigeon’s overall concerns can be summarised as follows:

- **Failure to prepare simultaneous Local Plans**: Pigeon is aware that there is an objective towards discussion between the authorities approach to housing requirements and that the constituent authorities are committed to progressing an emerging generation of plans to a similar timetable. Pigeon note that Ipswich Borough Council (IBC) Preferred Options document was consulted upon in March 2019 and is not as progressed as Suffolk Coastal which provides difficulty in establishing the minimum requirement for homes across the IHMA.

- **IBC’s ambitious spatial strategy**: IBC proposes one single urban extension the ‘Ipswich Garden Suburb’ for 3,485 dwellings. This accounts for half of the Plan’s total housing requirement. Pigeon is aware that the site is reliant on multiple
landowners coming forward and as such delivery of the site could be significantly delayed.

- **IBC’s estimated housing shortfall**: IBC’s emerging Plan identifies the estimated housing delivery for the Plan period to be 7,532 homes which leaves a total shortfall of 1,090 dwellings.

4.6 Therefore, Pigeon consider that Policy SCLP3.1 as currently drafted should be revised to plan for more sustainable growth by taking into consideration IBC and the other neighbouring authorities, and their ability to meet their housing needs over the Plan period.

4.7 To ensure Policy SCLP3.1 is effective, Pigeon suggest a 20% contingency should be applied to the housing requirement. This would contribute to addressing the unmet need from neighbouring authorities. Furthermore, it would ensure that there is a degree of flexibility in the delivery of sites and account for any future changes in demographic behaviour or changing circumstances.

4.8 By applying the suggested contingency, it would address the issues facing the wider strategic planning area in which Suffolk Coastal is positioned.

4.9 In response to question 2.18, Pigeon support the recognition of Saxmundham as a Market Town in Policy SCLP3.2 and consider that it is entirely justified to direct growth to this location. Saxmundham is one of the most sustainable locations within the northern half of the District for economic and housing growth. Furthermore, it is well placed to support large scale businesses such as Sizewell Nuclear Power Station.

4.10 Pigeon is also supportive of the identification of Trimley St Martin as a Large Village within the Settlement Hierarchy recognising it as a sustainable location for growth and in close proximity to Felixstowe.

4.11 However, as set out in Pigeon’s Regulation 19 Representations they do have concerns in the way Policy SCLP3.2 is worded and Pigeon has requested a rewording to exclude the requirement for development requirements to be delivered through Neighbourhood Plans. The delivery of housing and its location should be considered to be strategic policy, which for the purposes of the Framework, is addressed within the Local Plan.

4.12 In response to question 2.19, Pigeon support the distribution of housing delivery as set out in Table 3.5 which identifies housing growth within Saxmundham and Trimley St Martin. Pigeon maintain that SCLP12.29 South Saxmundham Garden Neighbourhood and SCLP12.66 Land Adjacent to Reeve Lodge, Trimley St Martin as identified within the Local Plan will make a significant contribution towards Suffolk Coastal’s housing targets.

4.13 In response to question 2.20, as noted within the response to question 2.17 by incorporating a 20% contingency to the housing requirement this will ensure that there is a degree of flexibility in the delivery of sites which would act as a mechanism to address any under-delivery of development during the Plan period. This approach would assist in the sustained delivery of housing over the Plan period.
However, as referred to in more detail in Matter Statement 4, it is evident that there is an approach adopted within some of the proposed Local Plan policies which is overly prescriptive requiring obligations and standards which are restrictive and unnecessary. This could affect the deliverability of sites and hinder the overall strategy for growth. Examples of these policies are:

- Policy SCLP3.5 Infrastructure Provision
- Policy SCLP5.8: Housing Mix
- Policy SCLP5.9: Self Build and Custom Build Housing
- Policy SCLP5.10: Affordable Housing on Residential Developments
- Policy SCLP9.2: Sustainable Construction
- Policy SCLP9.7: Holistic Water Management
- Policy SCLP10.1: Biodiversity and Geodiversity
- Policy SCLP11.1 Design Quality

Pigeon therefore consider that there needs to be a degree of flexibility incorporated within those policies in line with Paragraph 11 of the Framework so that the Plan is sufficiently flexible to adapt to rapid change.

Table 3.1 Strategic Policies

Question 2.21

Pigeon is supportive of Table 3.1 which identifies the strategic priorities and objective for the Plan and lists policies that are strategic to the delivery of the priorities of the Plan.
5. Part D – Economy

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

**Question 2.22**

5.1 Pigeon support the principle of Policy SCLP4.2, which seeks to support the delivery of new employment development within the District, as set out in their Regulation 19 Representations. Furthermore, on the whole, Pigeon consider that the aspiration to deliver a wide range of employment land throughout the Plan period is justified and consistent with national policy.

5.2 Pigeon support the identification of SCLP12.29 South Saxmundham Garden Neighbourhood which comprises an employment allocation of 7.25 ha. However, as noted within Pigeon’s response to the Council’s Regulation 18 Local Plan consultation, the Plan seeks to allocate the three primary employment allocations along the A14 between Ipswich and Felixstowe. Beyond these allocations, the only primary allocation is within the Saxmundham Garden Neighbourhood. Pigeon consider that the proposed allocation of land for employment within the South Saxmundham Garden Neighbourhood is entirely justified and will contribute to the overall employment land requirement in the District and wider Economic Area.

5.3 In their Regulation 18 representations, Pigeon suggested that the geographical distribution of housing and employment growth has the potential to be misaligned encouraging commuting to the south of the District in the A14 corridor. The growth for Saxmundham is supported but it has been identified that residents from this settlement already commute on average 19km to work. On this basis, Pigeon would argue that the Plan needs to consider additional sites closer to Saxmundham along the A12 corridor.

5.4 In view of this, to complement the Garden Neighbourhood at Saxmundham, Pigeon within their representations to the Final Draft Local Plan proposed a new site allocation on land to the west of the A12 and to the south of the allocated employment land. Pigeon maintain that the addition of the site will aid in the delivery of the Garden Neighbourhood, provide a new service area for the A12 and further employment opportunities within the motorway service area to add to the employment land provision within the Plan. This new development will be delivered through a masterplan approach and will be delivered as part of the Garden Neighbourhood and in line with its principles to reduce the need to travel for job opportunities.
6. **Part F – Infrastructure**

**Issue: Does the Plan make sufficient provision for infrastructure?**

**Policy SCLP3.5 Infrastructure Provision**

**Questions 2.38 and 2.39**

6.1 In response to question 2.38 as highlighted within the Regulation 19 representations, Pigeon is supportive of the initial work on infrastructure delivery, however, they consider that overall Policy SCLP3.5 as currently worded is not ‘justified’ or clear and consistent with Paragraphs 54 to 56 of the Framework.

6.2 The second paragraph of the Policy seeks to apply a blanket approach to infrastructure provision for all new development and place onerous requirements on the developer which undermine the deliverability of the Plan. The Local Plan should instead take a positive approach towards supporting infrastructure and only impose conditions and obligations where they are necessary.

6.3 In response to question 2.39, Pigeon consider that the principles of Holistic Water Management as currently drafted within Policy SCLP3.5 are unclear. Pigeon consider the requirements overly prescriptive and is at risk of delaying development by introducing unnecessary obligations. There appears to be no evidence or reasoning to the requirements of Holistic Water Management. Pigeon therefore suggest that until additional evidence is obtained on the process of Holistic Water Management, the requirement should be removed from the Local Plan.
Appendix 1: Regulation 18 Representations to Ipswich Borough Council Local Plan Consultation
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Ella Murfet

**Client**
Pigeon Investment Management Limited

**Our reference**
PIGC3010

13 March 2019
1. Introduction and Background

1.1 This Statement has been prepared on behalf of Pigeon Investment Management Limited (‘Pigeon’). It is in response to the Preferred Options Consultation on the Ipswich Local Plan.

1.2 This submission does not seek to promote any specific sites for development, but rather contains responses in light of Pigeon’s wider land interests. The overriding point that Pigeon wish to raise as part of the consultation, is that Ipswich Borough Council should be looking to neighbouring authorities in order to assist them with meeting their housing need.

1.3 This Statement contains responses on behalf of Pigeon to both the Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Preferred Options (November 2018). This Statement is subsequently split to reflect both of the documents.
2. **Duty to Co-operate**

2.1 Ipswich Borough Council forms part of the Ipswich Housing Market Area (IHMA) and Ipswich Functional Economic Area (IFEA), which also encompasses Suffolk Coastal District Council, Babergh District Council and Mid-Suffolk District Council. In accordance with the Localism Act 2011 and Paragraph 24 of the National Planning Policy Framework (NPPF) these local authorities are under a Duty to Co-operate with each other on strategic matters that cross administrative boundaries.

2.2 For the Ipswich Local Plan, a Duty to Co-operate Statement has been prepared alongside the Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Preferred Options (November 2018).

2.3 Within the Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018) the Council set out that they are actively engaged with Suffolk County Council and the neighbouring councils of East Suffolk, (Suffolk Coastal / Waveney Councils) and Babergh / Mid Suffolk on strategic growth matters, through the Ipswich Strategic Planning Area Board. The Ipswich Strategic Planning Area (ISPA) is an area that has long been used for strategic planning purposes around Ipswich and consists of the Borough Council area plus a number of surrounding parishes.

2.4 It adds that work is being undertaken through the Ipswich Strategic Planning Area Board which includes joint evidence gathering and agreement on joint approaches to the scale and distribution of future growth, cross boundary green infrastructure and strategic transport matters.

2.5 Pigeon are supportive of the fact that a working draft Statement of Common Ground (November 2018) has also been published alongside the Ipswich Local Plan Review. This sets out that one of the strategic cross-boundary matters to be addressed is ‘agreeing the approach to the delivery of the housing requirement’. It adds that ‘throughout the plan-making process should any authority identify that their overall land supply falls below that required to meet the housing need, further co-operation will be required across the ISPA to identify potential solutions to inform distribution across the ISPA’.
3. Core Strategy and Policies Development Plan
Document Review – Preferred Options (November 2018)

Policy CS2 – The Location and Nature of Development

3.1 Pigeon support that this policy recognises under point (c) the need for Ipswich Borough Council to work with neighbouring authorities to address housing need within the Ipswich Housing Market Area (IHMA). Notwithstanding this, Pigeon object to the fact that this ambition does not appear to be implemented in the Council’s proposals for housing development.

3.2 The subtext to the policy sets out that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF (which encourages the use of previously developed land). However, Pigeon seriously dispute the Council’s ability to deliver housing on many of the brownfield sites, which are discussed in further detail in the following section of this report.

3.3 Within the policy subtext the Council add that later in the plan period after 2031, the Council’s housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries within the neighbouring local authorities. In the first instance Pigeon are of the view that housing opportunities within the Borough are currently limited, and that there is a present need to consider sites beyond the boundary. In any case, there also does not appear to be any further evidence as to how housing will be delivered later in the plan period, and as such Pigeon have fundamental concerns that the Council have not explored these opportunities any further.

3.4 It is recommended that Ipswich Borough Council should look to sustainable locations which have good infrastructure, high accessibility to settlements with employment opportunities and connectivity to Ipswich. For example, neighbouring satellite villages around Ipswich such as Claydon, Sproughton and Wherstead can assist in delivering the housing growth to meet the objectively assessed need for housing in the Borough. These areas are well connected to Ipswich. Another example is the need for liaison with Suffolk Coastal District Council on the potential of growth corridors to the Felixstowe Peninsular, and along the A12 corridor around Saxmundham which can deliver housing growth.

Policy CS7 – The Amount of Housing Required

3.5 Policy CS7 of the adopted Core Strategy (2017) sets out an interim housing requirement of at least 9,777 dwellings (at 489 dwellings per annum) between 2011 and 2031. The Core Strategy recognised an urgent need to work with neighbouring authorities to produce an up to date Objectively Assessed Need for the Housing Market Area and joint or aligned plans to deliver it. However, capacity constraints in the Borough meant that sufficient suitable, deliverable and available land to deliver significantly more than 9,777 dwellings could not be met within the Council’s administrative area. In these circumstances, rather than delay adoption of the Core Strategy whilst an updated
Objectively Assessed Need for housing within the IHMA was identified, the Council undertook to complete this additional work post-adoptions as part of the production of joint or aligned local plans or a new strategic plan.

3.6 The supporting text to adopted policy CS7 states that the Council will, along with its neighbours, keep the housing target figure under review and consider any implications for meeting Ipswich need within the IHMA. Whilst Pigeon support this approach they again query how ‘its neighbours’ are responding to the housing requirements of Ipswich Borough Council.

3.7 Draft Policy CS7 within the Consultation Document sets a housing target of at least 8,622 dwellings for the period 2018-2036. The Council consider it necessary to adopt a stepped housing trajectory as the Council are currently unable to demonstrate that they a five-year housing land supply. Pigeon recognises that there may be circumstances where a Council needs to adopt a stepped trajectory. However, the lack of a five-year housing land supply on adoption of the plan cannot be considered to be relevant justification. Paragraph 3-034 of the Planning Practice Guidance indicates that there are two circumstances where a stepped trajectory may be appropriate – where there is a significant change in a housing requirement or where strategic sites will deliver later in the plan period. Whilst it would appear that the Council can satisfy one of these tests in that strategic sites in the plan will not deliver until later in the plan period, we would suggest that the step as set out in this policy does not reflect expected delivery. We would recommend that whilst a requirement in the first two years of 350 dpa is acceptable this should increase to 400 homes between 2020/21 and 2022/23. At 2023/24 this should then increase to 550. This is more in line with the delivery trajectory expected by the Council and will ensure that the Council remains focussed on delivering the necessary sites to meet housing needs.

3.8 In addition, the housing land supply set out in draft Policy CS7 only amounts to a total of 7,532 dwellings. The Council therefore already acknowledging a shortfall of 1,090 units. There is no evidence as to how the Council are intending to deal with this shortfall, and as such Pigeon have major concerns about the amount of new housing that is being proposed under the Ipswich Local Plan Review.

3.9 Table 3 sets out that 54.7% of all proposed housing allocations are on previously developed land. This appears to take into account the Garden Suburb which is 0% previously developed. Whilst the development of previously developed land may be supported by the NPPF, further commentary on the risks of this are set out in the subsequent section.

3.10 The subtext of the policy adds that due to the constrained nature of the Borough boundary, the Council has a limited capacity for future development. It adds that the Council is actively working with neighbouring authorities to identify housing need across the IHMA and prepare joint or aligned Local Plans to deliver it, but Pigeon are concerned that there is no evidence of this.

3.11 Ipswich is a driver of economic growth across the Ipswich Functional Economic Area (FEA). To support this economic growth the draft Core Strategy sets out how it will achieve job growth in draft policy CS13. However, in order to realise Ipswich’s economic growth objectives, the creation of new jobs needs to be supported and aligned with the
delivery of additional market and affordable homes. Pigeon consider that the draft Core Strategy does not achieve this synergy.

3.12 The starting point for assessing needs is set out clearly within national policy and guidance. Councils are expected to consider whether other factors will necessitate a higher housing requirement to support delivery in other areas such as employment or to improve delivery of affordable housing. Given that the level of affordable housing needs within Ipswich will not be met and to support economic growth in this key location, the Council needs to consider whether additional sites could be allocated that would make a further contribution to meeting these needs. It will also be important to raise this with neighbouring authorities to consider whether it is possible to allocate additional sites within the vicinity of Ipswich to increase the provision of affordable housing and support job growth.

3.13 Finally, the Housing Delivery Test results published in February 2019, determined that Ipswich Borough Council will need to apply a 20% buffer to their housing land supply, as they have only delivered 66% of their housing requirements between 2015-2018. The Council are therefore under further pressure to deliver housing.

Policy CS10 – Ipswich Garden Suburb

3.14 This urban extension is proposed to the north of the city. The policy text makes reference to the fact that this is the only area of extensive greenfield land still available within the Borough for development, due to the tight urban boundary. This demonstrates how limited the development opportunities within Ipswich Borough are.

3.15 There is an adopted SPD for this site, and within this it states that ‘the success of the development of the Garden Suburb will depend to a large extent on the continued partnership working of the landowners, IBC and other key stakeholders to secure delivery’. This site is therefore reliant on multiple landowners coming forward and Pigeon would therefore argue that this complication will significantly delay the delivery of the development during the plan period. This concern should be afforded significant weight by the Council given that the Garden Suburb accounts for around half of the supply of housing.

Summary

3.16 Therefore, whilst there appears to be much mention of Ipswich Borough Council working with neighbouring authorities, this does not appear to materialise into any real contribution to delivering housing outside of the Ipswich Borough Council area during the plan period.

3.17 In addition, it is of significant concern that the Council are clearly not able to meet their housing need requirements (and the level of affordable housing needs within Ipswich) within the plan period in their own authority area.

4.1 This commentary focuses specifically on the residential site allocations that are proposed by the Council under this document. It does not form a detailed assessment of each individual allocation, but rather provides broad comments. It is Pigeon’s argument that many of the sites proposed for allocation cannot be considered deliverable under the definition provided in Annex 2 of the NPPF.

4.2 There is also a requirement under the NPPF for the viability of sites to be tested at the plan making stage, which does not appear to have been thoroughly carried out in this case. It is the responsibility of the Council to test the sites proposed for development at this stage, particularly given the known constraints, which are covered in more detail below.

4.3 The vast majority of sites proposed for allocation are previously developed land. Most of these sites appear to have contamination constraints and the Council do highlight this. Survey and remediation work will therefore inevitably delay the completion of development on such sites, which Pigeon flag up as an issue with the strategy.

4.4 Furthermore the majority of these sites rely on relocation of other uses before the sites can be delivered. Those that will require relocation include small businesses, various types of depots, Council services etc. There does not appear to be any evidence in most cases that relocation sites have been found or secured. Some of these existing establishments are fairly large scale facilities and so it is unclear where the space for these will be, particularly when so much development is being directed to other previously developed sites, and the Council acknowledge that greenfield sites are limited. Pigeon therefore object to the amount of housing that is proposed on previously developed land where uses will need to be relocated. If businesses are placed under pressure to relocate or displaced altogether then this would contravene economic development aspirations set out within the Plan. If businesses are not however willing, or are indeed put under pressure to relocate, then these sites cannot reasonably be considered as deliverable.

4.5 Some of the proposed allocation sites are currently open space, amenity land or recreation grounds. There would either therefore be a loss of this space, or indeed provision would need to be reprovided. Again, there is no evidence that alternative sites have been found and if these would relate well to the parts of the community that would lose them. Pigeon object to this approach as allocating these sites will result in unacceptable and irreplaceable loss of open space for members of the public.

4.6 Many of the sites are car parks and constraints have been raised that parking would need to be reprovided, again with no indication that this has been considered, other than in a couple of examples where there is mention of an element of parking needing to remain
on the sites. Pigeon are concerned that in order to deliver these sites, much needed car parking in the city will be lost, displacing cars and putting further pressures on road parking.

4.7 Several of the sites appear to be within industrial or commercial areas of the city which may have amenity issues for residents. This will be a constraint on any planning application that comes forward on such sites, and may limit the amount of development that can be delivered.

4.8 Some of the sites appear to be in protected employment areas, which would seem to conflict with the intention behind the designation of these parts of the city.

4.9 Finally, the majority of sites identified for allocation are described to be medium or long term opportunities, with a much smaller number of short term sites. Even some of the short term sites are subject to constraints that are set out within this section, and as such Pigeon think that the conclusion that they could be short term is overoptimistic.

Summary

4.10 Therefore, Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Pigeon do not consider the approach of relocation of existing uses, where there is no reassurance that these can be successfully located elsewhere, as an appropriate strategy for delivering housing in Ipswich. Pigeon therefore strongly object to this approach, and suggest that the Council follow their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.

4.11 Pigeon would welcome the opportunity to meet with the Council to discuss how their portfolio of sites could assist the Council in meeting their housing need on sustainable sites, close to Ipswich, but within the neighbouring authorities.
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