Suffolk Coastal Local Plan Review

Matter 2A – Housing Provision

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

Statement Prepared by:

Turnberry

On behalf of:

Grainger PLC

Word Count: 1,336
This Statement has been prepared by Turnberry on behalf of Grainger PLC (Grainger), in advance of the Examination in Public (EiP) of Suffolk Coastal District Council’s (SCDC) Local Plan Review (the Plan). This Statement responds to **Matter 2A – Housing Provision.**

**Background**

1. We have responded to each stage of consultation on the emerging Local Plan and have been consistent in our point that more land for housing serving the wider Ipswich Area must be found. In that respect we have promoted land at Kesgrave, east of Bell Lane and south of Long Strops, known as Alternative Site 520. Full details of our Vision for the site, a mixed use community that is seeking to develop additional facilities and infrastructure for Kesgrave, are fully detailed in **Appendix 1 of our Main Matter 1 Statement**. This includes placing the existing Suffolk Aviation Heritage Group Museum on a sustainable path as part of a new community hub at the heart of the development.

2. The north western part of the site is under Option to Persimmon Homes and has been subject to a planning application for 300 dwellings. The application was the subject of an appeal (APP/J3530/W/16/3160194 – **Appendix 2 in our Main Matter 1 Statement**) which concluded that the site is a highly sustainable location for development (para 100) but was rejected on grounds of being contrary to the adopted Local Plan.

3. The allocation of Alternative Site 520 would sustainably contribute to the housing needs of Ipswich whilst the transformation of the Museum would leave a lasting and meaningful legacy for Kesgrave and the wider community in accordance with the Vision of the Local Plan.

**Response to Main Matter 2A Questions**

*Scale and Location of Growth*

2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?
5. We refer the Inspector to our response under **Main Matter 2C** and point out that this Policy cannot be effective as it purports to support the role of Ipswich as the County Town, yet only allocates 22.6% (2,567 homes) to the Wider Ipswich Area, of which the vast majority (2,000 homes) is at Brightwell Lakes and therefore beyond the urban area of the County Town. This means just 5% of total residential growth in the District will be located in the strategically important East of Ipswich area within the boundary of the A12. The spatial strategy is promoting growth in peripheral locations which, as set out in our **Main Matter 2C Statement**, are likely to contribute to congestion in the A12 and A14 corridors, which in itself is a threat to fulfilling quality of life and employment objectives referred to within policy SCLP2.1.

*The Supply of Housing and Housing Trajectory*

2.6 *Will there be a five year supply of deliverable housing sites on adoption of the Plan?*

6. The proposed growth strategy is over-reliant on strategic sites which do not deliver significant housing numbers within the first five years of the Plan, if any at all. Furthermore, strategic sites allocated in previous Development Plan Documents have failed to come forward in line with expected housing trajectories, and indeed the Brightwell Lakes site has fallen behind the phasing plan set out as recently as December 2018 in the Strategic Housing and Economic Land Availability Assessment (SHELAA).
7. The phasing in the SHELAA was itself a delay on the housing trajectory included within the Planning Statement of the outline planning application (DC/ 17/1435/OUT) which indicated delivery of 75 units in the year 18/19 (page 46). The SHELAA indicates that the Brightwell Lakes development will deliver 150 homes in the year 19/20 and a further 150 in the year 20/21. Given that construction of the units has not yet started, this target will inevitably be missed. In light of this, we consider that the Plan is not flexible enough to deliver enough housing in the first five years of the Plan that can meet the need of the Wider Ipswich Area.

8. The Plan allocates two other strategic housing sites around Ipswich; SCLP12.24 Land north of Humber Doucy Lane and SCLP12.25 Suffolk Police Headquarters. While these sites would provide opportunities for sustainable development with good public transport links, they are not scheduled to come forward within the first five years of the Plan period, with SCLP12.24 not planned for development until 2033. In light of this, it is our position that while they represent sustainable allocations, they do not meet the immediate needs of the East of Ipswich area.

9. We would also refer you to the evidence provided by Highways England which in Document A7 on page 1274/5 states:

“The principle mechanism for identifying and delivering major improvements to the SRN is the government’s future Road Investment Strategies (RIS). We also recognise therefore that there is something of a disjunction between the preparation of local plans and the preparation of future RIS. A14 junctions 55 to 58 have been the subject of studies related to the preparation of RIS2 (covering the period 2020 to 2025). However, we cannot confirm whether schemes to improve any or all of these junctions will be included in a future RIS before the government make their announcement towards the end of this year.”
Clearly this has potential to affect the overall soundness of the local plan in that delivery trajectories could be influenced." [Our emphasis]

10. However, it is the neighbouring authority of Ipswich Borough Council where delivery is particularly problematic. Ipswich has seen significant under delivery against its annual housing target of 489 homes since 2011, whereby it has delivered an average of 306 homes per year between 2011/12 and 2016/17 (shown in Table 1 below). This equates to just 62.5% of its target so far, and despite a significant increase in delivery planned from 2019/20 onwards, the Council is predicted to under deliver against its overall target by the end of the Plan period.

<table>
<thead>
<tr>
<th>Year</th>
<th>Annual Delivery</th>
<th>Cumulative Delivery (% of Total)</th>
<th>Total Cumulative Requirement</th>
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<td>2016/17</td>
<td>256</td>
<td>62.5</td>
<td>2,934</td>
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Table 1: Annual Housing Delivery in Ipswich Borough (Source: AMR 13, 2016/17. Published March 2018)

11. The Borough’s most recent Authority Monitoring Report (AMR) (March 2018), which covers the period 2016/17, shows that the Council cannot demonstrate a five year housing land supply, and that it cannot meet its adopted housing target. Until Ipswich Borough Council can advance its evidence base, there will be uncertainty surrounding its ability to achieve the right mix of lower density housing within the urban boundary which is deliverable.
12. There is therefore a strong likelihood that the area East of Ipswich will need to respond to a potential shortfall in housing and/or delivery rates. This Plan should be doing more to address the housing needs of the County Town by allocating more deliverable sites in close proximity to employment. Site 520 and its smaller Appeal site (the Persimmon application – Appendix 2 of our Main Matter 1 Statement), is one such example of a sustainable site deliverable within the first five years of the Plan.

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?

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

13. Notwithstanding an increase in delivery rates over the previous three years, the draft Plan is characterised by a few large strategic sites which will bring with them many challenging infrastructure issues that will take time to resolve. Indeed, Brightwell lakes was first allocated in 2013, but is unlikely to deliver its first occupation until 2020 at the earliest. If the newly allocated strategic sites follow this same trajectory, Saxmundham and Felixstowe Garden Suburbs are at least 8 years away from delivering. This points to restricted choice within the housing market and an over-reliance on a single site at Brightwell Lakes as well as isolated rural sites in the early years of the Plan. This will produce a perfect storm of a lack of sites serving the Wider Ipswich Area and a shortage of housing within the overall ISPA.