SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 21 AUGUST 2019

MATTER 2C – DISTRIBUTION OF GROWTH AND THE SETTLEMENT HIERARCHY

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019
<table>
<thead>
<tr>
<th>Site Name:</th>
<th>Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich</th>
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<tr>
<td>Client Name:</td>
<td>Bloor Homes Eastern</td>
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<td>Type of Report:</td>
<td>Hearing Statement – Matter 2C</td>
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<td>Date:</td>
<td>31st July 2019</td>
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Matter 2C – Distribution of Growth and the Settlement Hierarchy

1.0 Introduction

1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.

1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies our Hearing Statement for Matter 2A.

1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.

1.4 This Hearing Statement is concerned with Matter 2C of the Examination Hearing programme, and specifically addresses Points 2.17 and 2.18 of the Inspector's questions for Matter 2C.
2.0 Point 2.17 - Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?

2.1 Policy SCLP3.1 states as follows:

**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 sq m 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);

d) Ensuring the provision of infrastructure needed to support growth;

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.

2.2 This Hearing Statement supports our client’s case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that part of our client’s site falls within the Ipswich Borough Council administrative area.

2.3 Policy SCLP3.1 sets out the plan for growth across the district throughout the Plan period, identifying targets and forecasts for delivery across key sectors with a significant boost planned for housing supply. The policy sets a target of delivering at least 10,476 new dwellings throughout the Plan period with the delivery mechanism largely focused on two new garden Neighbourhoods at North Felixstowe and South Saxmundham.

2.4 However, the policy and its supporting justification (paragraphs 3.27-3.35) fails to make any specific reference at all to the “East of Ipswich Major Centre” as defined in the Plan’s settlement hierarchy (within Policy SCLP3.2). There is no indication that the area is a part of the “Spatial Strategy for Growth” through to 2036 or indeed part of any ongoing strategic cross-boundary considerations with Ipswich Borough Council.

2.5 The thrust of our concerns regarding Policy SCLP2.1 is therefore also equally applicable to Policy SCLP3.1, in that the policy fails to recognise the Plan’s stated “close functional relationship” with Ipswich Borough.
Policy SCLP3.1 is therefore defective through its failure to recognise and address the strategic cross-boundary issues arising from the Plan’s strategy for growth over the period 2018-2036, and its further failure to take account of the “East of Ipswich Major Centre”, either as part of those cross-boundary considerations or as part of the Plan’s growth strategy. The policy is effectively silent on these matters. Furthermore, the policy does not reflect the outcomes and agreements set out in the submitted SoCG, notably the statement that “The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities’ approach to housing requirements and to inform and guide the approach to be taken within each Local Plan”. It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, at least in as far as addressing the cross-boundary implications of meeting housing need in both Ipswich and Suffolk Coastal Districts are concerned, with the small allocation set out at Policy SCLP12.24 being added at a late stage in the Plan’s preparation and without fuller consideration of other potential development opportunities in the North East Ipswich area, which include our client’s site.

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

Rushmere St. Andrew (excluding the village) is defined within Policy SCLP3.2 as constituting part of the “East of Ipswich Major Centre” within the policy’s settlement hierarchy. The policy notes that “The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities”, and also that “The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan”.

The summary of the various policy approaches to the Settlement Hierarchy set out in Table 3.4 indicates that the only projected housing growth for the “East of Ipswich Major Centre” will be through development at Brightwell Lakes, at the Suffolk Police HQ site at Martlesham Heath and by development within settlement boundaries. It
is noteworthy that the proposed allocation in Policy SCLP12.24 is not listed within Table 3.4, inferring that it is in fact not being considered as part of the planned approach for housing development in the East of Ipswich Major Centre, as also discussed at paragraph 2.6 above. This is indicative of the Plan’s disjointed approach towards addressing the strategic planning opportunities in that Major Centre.

3.3 As set out in our Hearing Statement for Matter 2A, we consider that the Suffolk Coastal Local Plan does not yet address strategic cross-boundary issues with Ipswich Borough with sufficient clarity, particularly as they will affect the later years of the Plan period. The emerging Ipswich Local Plan identifies a long-term strategic direction of growth to the north-east of the existing Ipswich urban area, which is not reflected in the Suffolk Coastal Local Plan. Such a planned direction of growth by Ipswich Borough Council is adjacent to the Plan’s “East of Ipswich Major Centre” and potentially a part of that Major Centre, at least for the period post-2031.

3.4 The Plan’s only statement, at paragraph 3.34, that “In future Local Plan revisions, the Council will reconsider growth opportunities in the parts of the District neighbouring Ipswich, taking into account delivery rates at Brightwell Lakes and opportunity to bring forward development that supports the Business Case for strategic road routes to the north of Ipswich (as promoted by Suffolk County Council)” is an inadequate and uncertain policy position, bearing in mind that the Plan is presently seeking to address growth requirements up to 2036, and that the Ipswich Northern Route could be delivered from 2027 onwards.
4.0 Conclusion and Proposed Change to Submission Local Plan

4.1 This Hearing Statement, specifically addressing Policies SCLP3.1 and SCLP 3.2, should be considered in the context of our client’s broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP3.1 presently addresses such matters with sufficient clarity) and it specifically does not recognise the potential growth requirements of Ipswich Borough post-2031 and any potential requirements for further development in the “East of Ipswich Major Centre”, as defined in Policy SCLP3.2 and amplified in Table 3.4.

4.2 We consider that Policy SCLP3.1, and its supporting justification, should be modified to provide a clear policy direction to the statement that is presently confined to paragraph 3.34 in the Plan, and that the “East of Ipswich Major Centre” will be expected to accommodate further growth in the later phases of this Plan period, together with supporting infrastructure such as the planned Ipswich Northern Route.