Suffolk Coastal Local Plan Review

Matter 2C – 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?”

Statement Prepared by:

Turnberry

On behalf of:

Grainger PLC

Word Count: 2,532
Main Matter 2C Statement – Distribution of Growth and the Settlement Hierarchy

Grainger PLC

1. 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 2C – Distribution of Growth and the Settlement Hierarchy.

Background

2. 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.

3. 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.

4. 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 2C Questions

2.17 Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?
5. The strategy for growth as set out in Policy SCLP3.1 is neither justified nor would it be effective in delivering sustainable development.

6. The most recent Statement of Common Ground (March 2019) agreed by the authorities which make up the Ipswich Strategic Planning Area (ISPA) states that each Local Planning Authority will plan to meet its own housing need. In line with this, Policy SCLP3.1 aims to meet the housing needs of Suffolk Coastal District only and sets a target of at least 582 dwellings per annum, or 10,476 over the period 2018-36.

7. However, in meeting its own needs, the Council is ignoring the needs of the County Town, which is conspicuous by its omission within Policy SCLP3.1, which makes it incompatible with criterion C in Policy SCLP2.1.

8. Table 1 below shows that despite Ipswich driving 50% of all employment¹ in the Ipswich Functional Economic Area (IFEA) and being a key focus for those seeking to live and work within the region, Suffolk Coastal is allocating just a small proportion (22.6%) of its overall housing growth in the strategically important East of Ipswich area, very little of which will deliver within the first five years of the Plan period.

9. Table 1 also shows that a large proportion of new housing will be developed in smaller, rural communities, many of which are located along the A12 corridor and do not have sufficient capacity in terms of employment or services to serve new residents who will instead be forced to commute to Ipswich or other large settlements. We consider that strategic infrastructure upgrades to the A12 and A14 could be leveraged from all new development via the Community Infrastructure Levy (CIL) without the need to also locate development where it is dependent on these corridors, where several junctions are at, or will be at capacity.

---

¹ Suffolk Coastal First Draft Local Plan. Table 2.3, p.18
10. Whilst some housing in communities beyond Ipswich to improve sustainability and to provide housing choice should be supported, this cannot be at the expense of the County town. The distribution of growth promoted in the draft Plan fails to accord with its own Policy on this point (SCLP2.1 aims to support the continued role of Ipswich as County Town) and its Vision (p.23) in terms of making sure new growth is able to support the ability for people to live and work within their communities. The Vision states:

“Suffolk Coastal will have a diverse, strong and prosperous economy which supports key sectors and embraced new opportunities that emerge over the plan period. The stronger and more diverse economy will provide more and better paid local earnings and job opportunities, ensuring that people can stay within their communities.”

11. These communities must surely include the administrative Borough of Ipswich and its immediate orbit of related communities that make up East of Ipswich.

---

Table 1: Housing Delivery by Area (Source: Final Draft Local Plan Appendix D and December 2018 SHELAA Appendix L)

<table>
<thead>
<tr>
<th>Area</th>
<th>Delivery in First Five Years</th>
<th>Delivery in First Five Years (%)</th>
<th>Total Homes Identified(^2) 2018-36</th>
<th>Total Homes Identified 2018-36 (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Ipswich</td>
<td>570(^3)</td>
<td>13.9</td>
<td>2,567</td>
<td>22.6</td>
</tr>
<tr>
<td>Felixstowe</td>
<td>1,098</td>
<td>26.8</td>
<td>3,252</td>
<td>28.6</td>
</tr>
<tr>
<td>Market Towns</td>
<td>1,217</td>
<td>29.7</td>
<td>2,678</td>
<td>23.6</td>
</tr>
<tr>
<td>Rural (inc. Small/Large Villages)</td>
<td>1,212</td>
<td>29.6</td>
<td>2,871</td>
<td>25.2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,097</strong></td>
<td><strong>100</strong></td>
<td><strong>11,368</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

\(^2\) Figures in Table 1 are a combination of the allocations in Appendix D – Housing Land Trajectory of the Final Draft Local Plan and Appendix L – Committed Housing Supply of the December 2018 SHELAA.

\(^3\) This figure assumes that Brightwell Lakes and the delayed Western part of land at Trinity Park both begin to deliver units in 2020/21, which is considered the earliest feasible delivery date
12. The neighbouring authority of Ipswich Borough Council 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. 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. 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.

13. Setting aside the needs of the County Town, it is also not clear how the expansion of Felixstowe and Saxmundham can be considered to be within ‘environmental limits’ as defined within the Vision. Notwithstanding the erroneous assumptions within transport modelling, these expanded towns will not be able to internalise all employment and service needs and nor will public transport reduce the impact on the A12/A14 corridor.

14. Referring to the WSP Forecasting Report (Volume 2, January 2019 - Document D32), there are a number of unresolved junctions listed on page 15 which includes the A12 junction east of Woodbridge. This Report confirms the risk of locating major growth, which is dependent upon the County Town for jobs and services, some distance away at the end of a congested network. Indeed, we contest the assumptions underpinning the strategic transport modelling which suggests that Saxmundham Garden Suburb will generate 559 jobs alongside its 800 homes (WSP Methodology Report, January 2019 – Appendix A, page 78). This notion is not supported by the evidence.
15. Ipswich Economic Area Sector Needs Assessment (D3, September 2017) identifies Ipswich and Martlesham as driving business and professional services and in computing and technology, with the A12/A14 corridor driving logistics and manufacturing. Indeed, the idea of a strategic employment area in Saxmundham is absent from the Norfolk and Suffolk Economic Strategy (D5). It is difficult to envisage high quality employment coming forward in Saxmundham, delivering 559 jobs when there is an abundance of employment growth coming forward in locations more aligned to Ipswich and areas of strategic interest to key sectors.

16. The employment allocation at Saxmundham Garden Suburb is a fig leaf to sustainability designed to drive down the real impact of that allocation on the A12. In reality, residents will be destined to drive to Martlesham employment areas which has no train station, or other existing and emerging employment areas East of Ipswich. This assessment is supported by the Sustainability Appraisal at paragraph 3.182 which states in relation to Saxmundham:

“Although with a rail station, existing poor service provision on the East Suffolk Line means rail connectivity is relatively poor. Like other settlements on the A12 corridor, bus service provision is relatively poor.”

17. We also note the question marks over the capacity of the A14 raised by the County Council in their representations on Page 2505 of the Representations (Document A7):

“Previous work to identify improvements to the A14 junctions (junctions 55 to 58) indicated a potential cost range of between £80 and £125 million, although this may now be even. There are opportunities along the A14 that could be cost effective, however, the cost of improvements to the Copdock Junction will require significant funding.”
Whilst Highways England control the strategic road network, and are expected to comment on the Plan, there are related impacts to the local highway network controlled by Suffolk County Council. If improvements to the A14 cannot be delivered, impacts to the local highway network may not be able to be mitigated to a satisfactory level.”

18. It is self-evident that the only way to reduce pressure on the A12/14 corridor is to allocate development in close proximity to employment and services. The East of Ipswich area is ideal in that it is already well served by public transport and has radial connections directly into the City. Investment in public transport provision in this area, both in terms of infrastructure and travel planning will lead to a more sustainable pattern of development rather than promoting large scale development in more distant centres.

19. The proposed Local Plan does not align with its own evidence base and is therefore lacking in the justification needed to make the strategy in Policy SCLP3.1 Sound. The strategy set out in Policy SCLP3.1 fails to align development patterns with sustainable transport strategies, contrary to Paragraph 104 b) of the NPPF.

20. Moreover, increased congestion on the A12 and A14 corridors is surely a threat to quality of life and economic development objectives which form the basis of Policy SCLP2.1 and are set out in the Vision for the draft Plan. To achieve sustainable development and avoid the wider Ipswich area failing to meet its housing need, the Council should allocate land in appropriate locations such as Kesgrave which is a recognised Major Centre and therefore a sustainable location for growth.

2.18 Is the identification of settlements as set out in the Settlement Hierarchy in Policy SCLP3.2 justified?
21. Yes – the hierarchy reflects an appropriate ordering of sustainable centres, notwithstanding the fact that development has not been directed to the most appropriate, sustainable locations, despite East of Ipswich being more sustainable than lower order Market Towns such as Saxmundham.

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?

22. In response to Question 2.17 we have already set out why we think the overall distribution of development has not been justified. However, turning to the specifics of the Wider Ipswich Area, there are very few strategic sites identified which could serve Ipswich’s identified need; two site allocations (SCLP12.24 and SCLP12.25), and two sites with outline permission (Brightwell Lakes and the Western Part of Land at Trinity Park).

23. The largest of these, Brightwell Lakes, lies beyond the urban boundary of Ipswich and the A12 and will predominantly serve the employment land at Adastral Park. The two site allocations are not expected to deliver until late in the Plan period, and the Western Part of Land at Trinity Park has had outline permission for residential development since 2015 seemingly without further progress. We consider that while these four sites are suitable for residential development, they represent long-term development prospects and do not meet the immediate needs of Suffolk Coastal District and the wider Ipswich Strategic Planning Area, which has a pressing need for significant residential delivery in the East of Ipswich area.

24. The only source of new housing coming forward within the first five years of the Plan, and within reach of Ipswich will be at Brightwell Lakes, which is beyond the A12 and is less accessible than those sites immediately adjacent to the Ipswich urban area to those working within Ipswich or seeking to access its services and facilities.
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?

25. Until there is greater clarity around Ipswich Borough’s ability to meet its housing need within its own borders, the authorities which make up the ISPA should build in sufficient flexibility to their Plans to accommodate a share of Ipswich’s unmet need. At the very least this plan requires a mechanism for an early review as it is presently unclear if Ipswich can indeed accommodate its growth and then also deliver it given the challenging market conditions that exist within the County Town, as evidenced in its low delivery rates shown in Table 2 below.

<table>
<thead>
<tr>
<th>Year</th>
<th>Annual Delivery</th>
<th>Cumulative Delivery (% of Total)</th>
<th>Total Cumulative Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011/12</td>
<td>283</td>
<td>57.9</td>
<td>489</td>
</tr>
<tr>
<td>2012/13</td>
<td>100</td>
<td>39.2</td>
<td>978</td>
</tr>
<tr>
<td>2013/14</td>
<td>228</td>
<td>41.6</td>
<td>1,467</td>
</tr>
<tr>
<td>2014/15</td>
<td>470</td>
<td>55.3</td>
<td>1,956</td>
</tr>
<tr>
<td>2015/16</td>
<td>496</td>
<td>64.5</td>
<td>2,445</td>
</tr>
<tr>
<td>2016/17</td>
<td>256</td>
<td>62.5</td>
<td>2,934</td>
</tr>
</tbody>
</table>

Table 2: Annual Housing Delivery in Ipswich Borough (Source: AMR 13, 2016/17. Published March 2018)

26. In addition to issues regarding the spatial distribution of new housing growth, Suffolk Coastal District’s Plan currently fails to adequately plan for the new Northern Bypass, and indeed Policy SCLP3.1 fails to mention this significant new infrastructure project, further reducing its effectiveness. Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate
and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The new Local Plan has not adequately considered the new bypass and so is in danger of quickly becoming obsolete in light of further development of that proposal. The Council would benefit from an early review of its Plan for this reason in addition to that stated above relating to Ipswich’s future unmet housing need.

27. This leads us to our final point; the strategy for growth 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). We therefore 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.