HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins Homes

In respect of:
Matter 2C Distribution of Growth and the Settlement Hierarchy

Date:
July 2019

Document Reference:
GA/EW/05017/S0003
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of Matter 2C Distribution of Growth and the Settlement Hierarchy of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session 21st August 2019.

2. ISSUE – WHETHER THE PLAN SETS OUT A CLEAR STRATEGY FOR THE PATTERN OF DEVELOPMENT CONSISTENT WITH NATIONAL POLICY?

Question 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 The Local Plan seeks to significantly supply boost the supply of housing through the delivery of at least 582 new dwellings per annum (at least 10,476 over the period 2018 - 2036) based on the standard methodology. However, the PPG notes at Paragraph: 010 Reference ID: 2a-010-20190220 that the standard method for assessing local housing need provides a ‘minimum’ starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

2.2 Accordingly, it will be necessary to robustly consider this the housing requirement in the context of the need to support planned economic development and infrastructure, provide a degree of flexibility in the delivery of sites, account for any future changes in circumstances. Furthermore, there is a need to contribute to meeting any unmet needs arising within neighbouring authorities over the plan period, specifically that of Ipswich Borough which currently stands at 1,090 dwellings although the final extent of their shortfall will not be known until the emerging Local Plan has been robustly tested through the examination process for the emerging Ipswich Local Plan which has yet to reach the Regulation 19 consultation stage.

2.3 On the above basis, Hopkins Homes maintains that the housing requirement should be uplifted by at least 20% and accordingly there will be a need for further housing allocations beyond those currently
being proposed. The Council should therefore be positively seeking to allocate and/or maximise further suitable and sustainable sites for housing development in order to deliver sustainable development. Representations have been are made on behalf of Hopkins Homes and Hopkins & Moore in this respect.

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

2.4 The identification of settlements as set out in the Settlement Hierarchy is considered to be justified.

**Question 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?

2.5 Whilst Hopkins Homes supports the general principle housing growth to being directed to Felixstowe and particularly Saxmundham through the creation of two new Garden Neighbourhoods as well as to the higher order Market Towns, Large and Small Villages focused on the A12 corridor and other rural communities, it is felt that the Council is not taking the opportunity to allocate sufficient sites to address housing needs over the plan period in the rural areas such as Kirton and are concerned that the housing distribution set out in Table 3.5 is not consistent with national policy in this regard (paragraph 78 of the NPPF). When coupled with the restrictions imposed by Policy SCLP3.3 Settlement Boundaries (discussed below) this would severely restrict opportunities for any additional sustainable development during the plan period. It is therefore considered that the Plan should be more flexible to allowing suitable levels of growth in rural areas of the District in order to support sustainability.

**Question 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?

2.6 No. Policy SCLP3.3 has the express intention of containing the physical growth of settlements and is considered to be unduly restrictive and will serve to preclude otherwise sustainable development from taking place on the edge of settlements in appropriate circumstances. Such an approach would fail to fulfil the national objective of boosting significantly the supply of housing (NPPF paragraph 59) and does not include the necessary degree of flexibility to respond to rapid change over the Plan period and allow for the presumption in favour of sustainable development to be engaged in line with
paragraph 11 of the NPPF.

2.7 Policy SCLP3.3 should be amended to include a caveat that the settlement boundary can be breached and a positive approach taken reflecting the presumption in favour of sustainable development contained in the NPPF in circumstances where policies which are most important for determining an application are out-of-date by reason of the Council being unable to demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test is not met (NPPF paragraph 11, footnote 7).