INDEPENDENT EXAMINATION OF THE SUFFOLK COASTAL LOCAL PLAN

MATTER 2C STATEMENT

ON BEHALF OF PERSIMMON HOMES (SUFFOLK)
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1. **INTRODUCTION**

1.1 This statement has been prepared by Pegasus Group on behalf of Persimmon Homes Suffolk (hereafter referred to as ‘Persimmon’) who has land interests within Suffolk Coastal District.

1.2 This statement provides a response to Matter 2: The Suffolk Coastal Spatial Strategy and should be read in conjunction with representations submitted to the Draft Submission Local Plan [CD-A1] in February 2019. Persimmon’s interest relates to land off Bell Lane, south of Kesgrave, which forms part of a wider site referred to as ‘Site 520’ in the Council’s evidence base.
2. **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?

**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 As set out within the response to Matter 1 Question 1.2, the SA is inadequate in its assessment of alternative and indeed more sustainable development options. The SA does not refer to the findings of the various Transport reports that make up the Evidence Base, whilst the Interim Sustainability Appraisal predates the earliest report examining the strategic impact of the preferred strategy upon the network. The final SA also predates the final WSP Transport Reports issued in January 2019.

2.2 It is therefore clear that the SA has been written to justify and evidence the preferred growth strategy, rather than to inform and advise as to the most sustainable growth strategy.

2.3 We have also previously raised concerns that the Suffolk Coastal Local Plan, as currently drafted, focuses upon its own need rather than providing a meaningful commitment to accommodate the needs of Ipswich Borough.

2.4 Ipswich Borough has seen significant under delivery against its annual housing target since 2011 (489 dpa), whereby it has delivered an average of 306 homes per year between 2011/12 and 2016/17. This equates to just 63% of its target so far, with the Council predicted to under deliver against its overall target by the end of the Plan period. Ipswich 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.

2.5 As it stands, the cooperation by Suffolk Coastal extends to an agreement to allocate the Humber Doucy Lane site (allocation reference: SCLP12.24) which is only intended to deliver 150 houses post-2031. This site is clearly dependent upon the wider Ipswich Garden Village (within Ipswich Borough) coming forward to deliver the infrastructure required to unlock it and therefore is constrained in the short to medium term.
2.6 The strategy for growth set out in Policy SCLP3.1 is therefore neither justified or effective in delivering sustainable development.

2.7 Persimmon’s interest at land off Bell Lane, south of Kesgrave, (part of wider site ‘Site 520’) would serve to meet housing needs arising from both within Ipswich Borough and Suffolk Coastal District in the short-term. The site is available for development now and is not dependent on infrastructure improvements provided by alternative sites.

2.8 Furthermore, the site was the subject of an appeal (ref: 3160194) which concluded that the site is a highly sustainable location for development (para 100 of appeal decision) but was instead dismissed on grounds of being contrary to the overall growth strategy within the Local Plan.

2.9 It is considered that these circumstances have now changed and, given the needs of Ipswich Borough, it is entirely appropriate to include the site within the overall growth strategy for Suffolk Coastal District.

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

2.10 Please see response to Question 2.19.

**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?**

2.11 Kesgrave is identified as part of the ‘East of Ipswich’ settlements, which collectively are classed as a ‘Major Centre’, sitting atop the Settlement Hierarchy defined within Policy SCLP3.2. Kesgrave is, consequently, clearly a sustainable location for development. It is therefore conflicting that Table 3.5 of the Local Plan identifies Kesgrave as only contributing approximately 39 dwellings (<0.5% of the overall minimum housing requirement) across the plan period, especially when settlements in lower tiers (such as the Market Towns as well as a number of Large Villages) are consistently identified as accommodating a greater level of growth.
2.12 It is considered that this approach will not deliver the most sustainable development strategy for Suffolk Coastal District and is therefore not consistent with national policy, as per the requirement of the fourth bullet point of paragraph 35 of the NPPF.

2.13 For these reasons we firmly believe that the allocation of land south of Kesgrave would be fully justified, particularly the inclusion of the Persimmon land which offers a deliverable site to help ensure that the Council has a robust five-year housing supply from the point of adoption. The site has previously been found to be sustainable and deliverable through the planning application and appeal process, and a planning application can be determined quickly to enable housing delivery very early in the plan period, thus supporting the delivery of larger strategic sites later in the plan period.

2.14 Paragraphs 67 and 68 of the NPPF are clear that the Local Plan should identify specific, deliverable sites for the first five years of the plan period (with an appropriate buffer), whilst Paragraphs 73 to 76 require Councils to maintain and monitor housing land supply (with Footnote 7 of Paragraph 11 clearly setting out the consequences of not maintaining a five-year housing land supply). That is that the Council should grant planning permission except where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

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?

2.15 Policy SCLP3.3 is not sufficiently flexible in line with the NPPF. In particular, the third paragraph states:

"New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise."

2.16 This paragraph does not reflect the provisions of the NPPF in respect of a number of matters, for example; rural affordable housing exception sites (NPPF para. 77),
agricultural worker’s dwellings, heritage assets or exceptional quality dwellings (NPPG para. 79), live-work units (NPPF para. 81 d) and supporting the rural economy (NPPF paras. 83-84)

**Question 2.21:** Is the identification of strategic policies in Table 3.1 consistent with national policy as set out in paragraphs 20 to 30 of the Framework?

2.17 No – those policies listed in Table 3.1 encompass the majority of the policies contained within the plan. NPPF para. 21 (incl. footnote 13) is clear that “where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies”. 