Suffolk Coastal Local Plan Review

Matter 3 – Area Specific Strategies - Development Allocations

“Issue: Are the proposed Area Specific Strategies, allocations and policies justified, effective and consistent with national policy?”

Statement Prepared by:

Turnberry

On behalf of:

Grainger PLC

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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 3 – Area Specific Strategies – Development Allocations.

**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 3 Questions**

*Policy SCLP12.18: Strategy for Communities Surrounding Ipswich*
3.23 Would the strategy be effective in addressing the potential impacts of development on the transport networks consistent with the policies of the Framework?

5. It is our consideration first and foremost that the Strategy is not effective as it relies too heavily on the Brightwell Lakes site, which cannot be considered part of the East of Ipswich area in the same way that allocations SCLP12.24 Land north of Humber Doucy Lane and SCLP12.25 Suffolk Police Headquarters are.

6. While lying to the east of Ipswich, Brightwell Lakes is separated both physically and in terms of public transport accessibility by the A12, a major barrier to future sustainable development which could serve Ipswich’s needs. While Brightwell Lakes will deliver much needed housing within the District, this will predominantly serve the employment land at Adastral Park and relate to the far eastern edge of the East of Ipswich built-up area at Martlesham Heath. The Brightwell Lakes site will inevitably lead to a rise in private car use as residents commute to central Ipswich, creating greater pressure on the transport network.

7. 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. Furthermore, the Brightwell Lakes development has fallen behind its indicated delivery trajectory, further restricting the number of dwellings that will be delivered in this area within the first five years of the Plan period.
8. This pressure could be alleviated by allocating Site 520, which would offer a greater choice of housing in a more sustainable location firmly within the East of Ipswich area, as well as providing land to support the Suffolk Aviation Museum and creating economic gain to enable the future growth of the historic asset, fulfilling the objectives of the Strategy by maintaining a healthy and vibrant community with appropriate community infrastructure.

9. Paragraph 12.178 of the Plan’s supporting text for Policy SCLP12.18 states that the Plan does not seek to identify any large scale developments which could potentially blight future options for a Northern bypass around Ipswich, further restricting choice of housing sites with potential to service Ipswich. In respect of the NPPF, we believe that the Plan’s intention to review “potential future scenarios for housing and employment growth beyond that which is being planned for within this Local Plan” (paragraph 2.16) once a location for the northern bypass is resolved is inconsistent with paragraph 22 of the NPPF. Paragraph 22 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”.

10. As outlined in our Main Matter 2C – Distribution of Growth and the Settlement Hierarchy Statement, the expansion at Brightwell Lakes along with Felixstowe and Saxmundham and other settlements along the A12/A14 corridor will not be able to internalise all employment and service needs, increasing the use of these corridors. In that statement we refer to the evidence provided by Suffolk County Council and Highways England as to the capacity of these corridors and the risk to both congestion and delay that the Garden Suburbs bring with them.
11. One of the ‘key issues’ identified in paragraph 1.32 of the draft Plan is that there is a reliance on the private motor car and a lack of public transport provision. Allocating the majority of housing beyond the A12 at Brightwell lakes and in areas such as Felixstowe and Saxmundham will exacerbate this issue and the Strategy is therefore not effective.