Suffolk Coastal Examination in Public (East Suffolk Coastal) Hearing Statement

Representor number: TBC

Matter: 3

On behalf of Landform Martlesham Limited

C. Distribution

Matter 3: Area Specific Strategies – Development Allocations

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

General question: Is each allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

General question: Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability?

Communities Surrounding Ipswich

Policy SCLP12.19 Brightwell Lakes

Q3.24 Would the Policy be effective in conserving the significance of the Scheduled Monuments within and close to the site?

1.1 Brightwell Lakes (formerly Adastral Park) has been promoted for development over a number of years and was allocated for mixed use in the previous Core Strategy (2013). The 2018 National Planning Policy Framework (NPPF) Housing Delivery Test is now applicable and we emphasise the requirements of Paragraph 7. The Test, which is to be applied on an annual rolling basis across the plan period, looks to the previous three-year housing delivery compared to the housing delivery target. Failure to meet the delivery target (in this context meaning less than 95%) means the local authority will be required to put in place an action plan; at less than 85% authorities will need to identify a 20% buffer and at less than 25% delivery there will be a presumption in favour of sustainable development. The most effective mechanism for the Council is to ensure that it has identified sites that are genuinely deliverable at the rate required and to build in some level of flexibility in supply to allow for the inevitable delays in delivery that occurs, particularly on larger sites.
1.2 Outline planning permission (ref. DC/17/1435/OUT) was approved in April 2018 for 2,000 dwellings, employment, local centres, education, green infrastructure, community uses and associated infrastructure. Since outline planning permission was granted, two separate reserved matters applications have been submitted to SCDC to allow delivery of the Site Entrance and Boulevard (ref. DC/18/2774/ARM) and Green Infrastructure (ref. DC/18/2775/ARM). An application for the discharge of conditions pursuant to the outline permission has also been submitted. While these applications were registered in July 2018, a decision has yet to be issued by SCDC.

1.3 The housing delivery trajectory set out in the Planning Statement (Table 23.1) attached to the outline planning application indicates that, in accordance with Policy SP1A of the Core Strategy, it is expected that annual occupations will be 150 dwellings per annum in the years 19/20 and 20/21 and 125 dwellings in 21/22. It is anticipated that a steady occupation rate of 160 dwellings per annum will be achieved from 22/23 to 30/31.

1.4 It is proposed that years 16/17, 17/18 and the early part of 18/19 "would involve the establishment of various consents including outline planning permission, infrastructure details, Highway Act consents and Reserved Matters for the early phases".

1.5 This delivery rate would appear to be optimistic and based on our considerable experience across similar sites on a national basis is unlikely to be achieved, and yet an even more optimistic delivery trajectory is put forward in the Council’s Housing Land Supply Statement 2018. It states:

"Of all the sites in the district, the largest single source of housing supply is at the land south and east of BT Adastral Park...The landowner has responded to our request for information about expected completions confirming that they intend to deliver homes from year 2019/20 with an expectation that it will deliver up to 260 homes per year in following years. The Council has approved measures through phasing, conditions and trigger points to open up more of the site in the first phase. Based on the rapid progress on infrastructure the Council is confident completions will commence in the 2nd year of this assessment period. The Council will closely monitor completions on this site and expects future assessments to show completions at the rate put forward by the landowner. However, for this first years of the site’s development (up to 2022/23), a conservative approach has been incorporated, based on the first phases completing at a rate of up to 150 homes per year”.

1.6 While the Council states that it is confident in the trajectory provided by the Applicant, with the first round of reserved matters still to be approved, and no subsequent reserved matters submitted for the proposed dwellings, there is clearly already slippage in the proposed delivery rates, even when a conservative approach is taken in the first phases.

1.7 In the context of the Housing Delivery Test, the Council will need to be certain that this site and other strategic allocations are deliverable in the timeframes outlined. In the context of providing housing for the elderly, the delays at Brightwell Lakes create uncertainty of delivery. The Council has included the full delivery of 2,000 dwellings (including a proportion of elderly accommodation) within its calculations for the Plan period, placing a heavy reliance on the site to meet the needs of the local population. If plans are brought forward in the timescales outlined, the care facility will likely be developed later in the Plan period meaning the local needs are not addressed.
1.8 Focusing on whether the Policy is effective in conserving the significance of the Scheduled Monuments within and close to the site, Landform consider that any constraints within or adjacent to the Brightwell Lakes site will not accelerate delivery.

**Conclusion**

1.9 In conclusion, Landform raises concern with the delivery of development proposals at Brightwell Lakes. In addressing this shortcoming, the draft Local Plan should be amended to include the following:

1. A monitoring mechanism to ensure delivery of strategic sites; and,
2. Identification of reserve sites to come forward in the event strategic development sites are delayed.

**BARTON WILLMORE**

1 August 2019