Gladman

Matter 3
Area Specific Strategies – Development Allocations

East Suffolk Council
Examination of the Suffolk Coastal Local Plan

August 2019
Felixstowe


North Felixstowe Garden Neighbourhood

1. The strategy for Felixstowe and the requirements associated with the associated allocations introduce a number of factors that could act to delay delivery at the site. Furthermore, no evidence was made available at the Regulation 19 stage to demonstrate that the sustained delivery of 160 dwellings per annum can be achieved at the Garden Village taking into account the site-specific requirements that have been set out through Policy SCLP12.3 of the Plan and the factors highlighted in our Matter 2 Hearing Statement in response to question 2.8.

Communities Surrounding Ipswich

Policy 12.18: Strategy for Communities Surrounding Ipswich

Would the strategy be effective in addressing the potential impacts of development on the transport networks consistent with the policies of the Framework?

2. Gladman are concerned that the proposed strategy for the communities surrounding Ipswich fails to consider the full range of development opportunities that exist to the East of Ipswich and fails to contribute to the wider than local priorities that are set through policies SCLP2.1 and SCLP2.2. Indeed, Paragraph 102 of the Framework makes clear that transport issues should be considered from the earliest stages of plan making. This includes the need to ensure that opportunities from existing or proposed transport infrastructure, and changing transport technology and usage are realised. The Plan in its current form fails to fully consider opportunities for development to the East of Ipswich, such as Orwell Green Garden Village or the opportunities that will arise from the proposed Ipswich Northern Route. As discussed in Our Matter 1 and Matter 2 Hearing Statements, it is vitally important that the Local Plan is updated in a timely manner to take on board the opportunities associated with the area’s most sustainable location to the East of Ipswich, any unmet needs arising from Ipswich and the opportunities associated with new and existing infrastructure.
Policy SCLP12.24: Land at Humber Doucy Lane

What is the justification for the allocation of Land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?

3. Gladman note the long-term nature of this proposed allocation, which will come forward for development post 2031. As discussed in our Matter 1 Statement, this allocation raises concerns that it is being brought forward for allocation whilst reasonable alternative sites to the East of Ipswich have not be adequately tested through the sustainability appraisal.

Saxmundham

General Questions and Policy SCLP12.28: Strategy for Saxmundham

4. Gladman are concerned that the strategy proposes a significant amount of growth at a small market town when reasonable alternative approaches to locate development in locations that are better served to fulfil the strategic priorities of the wider area have not been adequately considered (as discussed in our Matter 1 Statement). In addition, clear evidence is required to justify the proposed delivery rates that have been set out in the Housing Trajectory at Appendix D of the Plan, which must take into account the site specific requirements that are set out in the Plan and the factors highlighted in our Matter 2 Hearing Statement in response to question 2.8.