Gladman

Matter 4
Policies

East Suffolk Council
Examination of the Suffolk Coastal Local Plan

GLADMANN

August 2019
Matter 4: Policies

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

Housing policies

Policy SCLP5.8: Housing Mix

4.4  The Framework in paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and be reflected in planning policies. Has the size, type and tenure of properties needed for the Plan area been adequately assessed and would the Policy be effective in meeting needs?

4.4.1  The proposed policy SCLP5.8 is considered too prescriptive and provides insufficient flexibility for individual development proposals to provide a mix that responds positively to the specific characteristics of an individual site. The policy should instead reflect that the SHMA provides a guide to the housing mix requirement for development proposals.

4.5  Is it justified to apply the housing size requirements as set out in Table 5.1 to all proposals of 5 or more dwellings? Have the viability implications of such requirements been assessed?

4.5.1  The requirement for sites of 5 or more to provide for at least 40% to be 1 or 2 bed properties is not justified. Flexibility should be introduced to ensure that an optimum mix that reflects the evidence of the SHMA can be provided on a site-by-site basis, taking into account the individual characteristics of a site.

4.6  Is Policy SCLP5.8 justified and consistent with national policy in applying M4(2) standards to at least 50% of dwellings and on developments of more than 10 units?

4.6.1  It is important that any requirement to introduce optional technical standards is based on identified needs. Whilst the SHMA does identify an increase in the number of older people over the plan period, including those with a limiting long-term illness, further consideration is needed to inform whether this directly translates into the level of M4(2) standard homes that are being required by this policy.

4.6.2  In formulating the need for M4(2) standard housing, several additional considerations need to be taken on board, including:
• The extent to which the older population are content to remain within their existing homes
• The ability of new homes built to M4(1) standards to meet the needs of older people
• The consideration of needs within different tenures

4.6.3 Gladman are of the therefore of the view that this element of the policy has not been suitably justified and should be removed.

4.7 Would the Policy be effective in meeting the housing needs of older people?

4.7.1 Gladman supports the proposed approach, which reflects the evidence and provides the flexibility that is needed to respond positively to meeting the needs of older people through the decision making on individual planning applications.

Policy SCLP5.9: Self Build and Custom Build Housing

4.8 Is the policy justified in terms of need, threshold and minimum target and how would it be effective in encouraging and providing for self-build and custom-build housing?

4.8.1 Gladman supports the concept of planning for self-build and custom-build housing, however local planning policies relating to these products must be fully justified and effective in responding to and meeting the demand for these types of product over the plan period.

4.8.2 There does not appear to be any clear justification for the introduction of an arbitrary requirement for developments of 100 or more dwellings to provide a minimum of 5% self build or custom build properties on site through the provision of custom / self build plots. The Local Plan at paragraph 5.51 indicates that there were ‘over 250 people on the Suffolk Coastal self-build’ in November 2018, although it does not confirm the actual number. It is also unclear whether the individuals on the register would wish to develop their homes on large scale housing sites (of over 100 dwellings). It is important that policies of this nature are only included in plans where they respond to clear evidence of need and demand for such products across a local authority area.

4.8.3 Alternative approaches that will support the delivery of custom and self-build in locations that match demand should also be fully explored through the plan making process. These alternatives should include the consideration of how to support the demands that have been identified through the Council’s evidence base contained in its Custom and Self Build Register and any supplementary work that has been undertaken to better understand the specific needs of those wishing to develop homes in this way. A positive approach to identifying the
land that is required to meet the demand for this type of product is required, this could include:

- developing exceptions policies in their Local Plan for self build and custom housebuilding and engage with landowners with suitable sites in locations where demand exists;
- setting out within strategic policies of the plan how neighbourhood planning can facilitate the availability of land for self build and custom build where demand exists;
- exploring the potential to use council owned land to provide plots for custom and self-build to market to those on the register.

Natural environment

SCLP10.4: Landscape Character

4.34 Are the requirements for development to protect and enhance tranquillity justified?

4.34.1 Paragraph 80(b) of the Framework requires local authorities to “identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”. The general approach that has been set out in the proposed policy is not considered consistent with the Framework because it does provide the justification for or identify tranquil areas. Furthermore, the approach set out in the Framework seeks to protect tranquil areas once they have been identified rather than ‘enhance’ them.

4.34.2 The proposed policy as drafted is also considered to be inconsistent with Paragraph 180(c) of the Framework. The references to protecting and enhancing dark skies should be amended to reflect national policy which seeks to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.

SCLP10.5: Settlement Coalescence

Gladman also raised concerns at the Regulation 19 stage with regard to Policy SCLP10.5: Settlement Coalescence. The inclusion of local environmental policies that seek to prevent coalescence (either within local plans or neighbourhood plans) should be predicated on robust evidence. Furthermore, the associated policy wording should be drafted in a criteria based manner that enables case-by-case judgements to be made on the impact of proposed developments in relation to issues of coalescence. Within any such approach, it must be recognised that new development can often be located in areas between settlements without leading to them physically or visually merging. Any policy of this nature should recognise that
where harm arises, this should be mitigated where possible and assessed against the wider sustainability benefits of a development proposal in line with the presumption in favour of sustainable development.

Built and Historic Environment

Policy SCLP11.9: Areas to be Protected from Development

4.41 What is the justification for the specific areas to be protected from development as shown on the Policies map?

4.41.1 No specific evidence was published to justify the introduction of the ‘Areas to be Protected from Development’ alongside the Regulation 19 version of the Plan. There is no specific restrictive mechanism of this kind set out in national policy and therefore it is essential that any local policy of this nature is formulated alongside evidence that explains why the specific locations might need to be protected and how this accords with the provisions set out in Section 15 of the Framework, in particular paragraph 170.

4.42 Is the Policy clear in respect of what development in the designated areas would be ‘severely restricted to’ and would it be effective?

4.42.1 The proposed approach appears to restrict all development within the areas identified on the policies map. This is not consistent with the paragraphs set out in Section 15 of the Framework, which provide a more nuanced approach which would allow the consideration of any harm alongside the benefits of a development proposal. Justification is required to explain why the identified areas should be afforded an enhanced level of protection and a policy approach introduced that requires development proposals to recognise and have regard to any such issues.