MATTER 4


A7_RepID842: my R19 response; the attachment to pp1049-1052 forms a basis for answers here.

Generally, it touches upon questions here from the perspectives of SCLP12.18, SCLP12.35, SCLP12.66.

Port = Port of Felixstowe, its operator
LA = Suffolk Coastal/East Suffolk Council

Question 4.4 SCLP5.8 NPPF61

Question 4.5 SCLP5.8 Table 5.1

Answer: No with reference to SCLP12.65, SCLP12.66 (para 2 applies to Q4.5).

1. The preamble to SCLP5.8 recognises a wide scope for size, type and tenure for different groups. However, this is not reflected in Table 5.1 that is referred to by the policy: it is confined to proportions of bedroom numbers and applies those uniformly.

2. Thus, housing developments in rural areas will be expected to have the same proportion of 1-2 bedroom dwellings as those in major towns. I suggest that is not reasonable given the varying mix of people needing them. Developers will build what they believe will be the best types of houses to sell and, given any shortage, buyers will relocate accordingly. However, within the constraints of viability, planning should intervene: otherwise the result could be young singles commuting from country to town and families not finding the space they need in more open areas.

3. SCLP5.8 specifies a target for M4(2) dwellings, but nothing more.

4. The mix of size, type and tenure for different groups will be a significant factor in the design and viability of housing proposals. For reasons of viability, NPPF encourages site policies to specify requirements per site.

5. SCLP5.8 mandates developers will be required to demonstrate how a proposal contributes to the increasing choice and mix of housing available for the older population, but I’m not aware of any baseline they may refer to; and this is not an effective method of meeting a target when proposals are submitted and approved piecemeal. Again, targets should be set per site policy.

6. I do not see this in SCLP12.65 and SCLP12.66 and the latter (at least) is not working. SCLP12.66 encourages dwellings for the elderly, suggesting vaguely apartments (12.760), and the developer responded to Reg19 consultation with “bungalows” (A7_ReplID1513_2149). Bungalows are popular with young as well as elderly. I suggest SCLP5.8 is not working even at the planning stage.
Answer: Yes

7. NPPF180(b) requires this. Much of the area is rural or coastal and characterised as tranquil. All communities should have the opportunity to identify tranquil places. Relevance will vary across the area, but NPPF is not a tick-box so allows for this.

8. The issue I see is that a major site allocation (SCLP12.35) is not respecting that. With SCLP12.35, tranquillity would be difficult to maintain in the nearby AONB and its rural setting south of the A14, which has indeed long-enjoyed silence and has long been valued both near and afar for that. This scores against the soundness of that policy, and the SA that selected it.