INDEPENDENT EXAMINATION OF THE SUFFOLK COASTAL LOCAL PLAN

MATTER 4 STATEMENT

ON BEHALF OF PERSIMMON HOMES (SUFFOLK)
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1. INTRODUCTION

1.1 This statement has been prepared by Pegasus Group on behalf of Persimmon Homes Suffolk (hereafter referred to as ‘Persimmon’) who has land interests within Suffolk Coastal District.

1.2 This statement provides a response to Matter 4 and should be read in conjunction with representations submitted to the Draft Submission Local Plan [CD-A1] in February 2019. Persimmon’s interest relates to land off Bell Lane, south of Kesgrave.

1.3 Matter 4 pertains to Policies and concerns the following issue:

   **Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?**
2. **HOUSING POLICIES**

**Policy SCLP5.8: Housing Mix**

**Question 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?

2.1 Whilst Persimmon fully supports the delivery of a mix of housing as key to creating sustainable communities, we have concerns regarding the wording of Policy SCLP5.8 as drafted. These concerns were submitted to the draft Regulation 18 version of the Local Plan, the wording of which remains unchanged. The policy sets onerous requirements on small and major housing development which could have significant implications in terms of viability and therefore deliverability of new housing. We therefore consider the policy to be inconsistent with the NPPF and advice within the PPG.

2.2 The revised iteration of the NPPF introduces the assumption that development proposals will be viable and capable of bearing the contributions set out within up-to-date policies. Paragraph 57 of the NPPF prescribes that "all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available". The NPPF therefore clearly expects development viability to be taken into account by local authorities in the preparation of their development plans.

2.3 The PPG supports this by confirming that the "role for viability assessment is primarily at the plan making stage". The clear aim of the NPPF and practice guidance is for local authorities to adopt plans that are realistic and deliverable and do not compromise sustainable development.

2.4 As was the case at draft Regulation 18 stage, there is no evidence to assess the impact of Policy SCLP5.8 and especially the requirement for 50% of all dwellings on sites of 10 dwellings or more to be designed to meet Part M4(2) of the Building Regulations.
2.5 Whilst it is acknowledged that the evidence contained within the Strategic Housing Market Assessment (SHMA) points towards a significant increase in the population aged 65 and over, it is necessary to bear in mind that a significant proportion of this age group will require specialist rather than mainstream market housing. For these reasons, there is no justification to require 50% of all housing on major development sites to be designed to Part M4(2) standards, especially without assessment of the financial implications of this policy requirement.

**Question 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?

2.6 See response to Question 4.4.

**Question 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?

2.7 See response to Question 4.4.

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

2.8 See response to Question 4.4.

**Policy SCLP5.9: Self Build and Custom Build Housing**

**Question 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?

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1 Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 (September 2017); Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 2 (August 2017); Ipswich Housing Market Area Strategic Housing Market Assessment Partial Part 2 Update (January 2019).
2.9 Whilst the supporting text to Policy SCLP5.9 refers to the Suffolk Coastal Self-build and Custom Build Register as evidence in order to justify the requirement of developments of 100 or more dwellings to provide a minimum of 5% self or custom build properties on site, it is considered that this evidence is not sufficiently objective.

2.10 Furthermore, the economic impact of this requirement on development has not been considered; specifically, how it may impact upon the viability of sites.

Lastly, the supporting text identifies that “a key element of self and custom build schemes is the flexibility to design and build homes to individual requirements.” However, the text then does on to require a design code to be agreed as part of an outline planning permission which establishes design principles to which each plot should adhere. This adds additional financial burden onto the developer, whilst simultaneously removing the flexibility which is paramount to the principles of self and custom-build plots.

Policy SCLP5.10: Affordable Housing on Residential Developments

**Question 4.10:** Is the requirement for 1 in 3 dwellings on sites of ten units or more to be affordable units and the split between affordable/social rent, shared ownership and discounted home ownership justified and consistent with national policy? Are these requirements deliverable and viable?

2.11 As was the case within the Regulation 18 draft plan, Policy SCLP5.10 requires all new major housing development to provide 1 in 3 (33%) homes as affordable housing. The draft policy goes on to provide a specific tenure mix, with 50% of the affording homes to be affordable / social rent; 25% shared ownership, and 25% discounted home ownership.

2.12 The January 2019 SHMA update states that within Suffolk Coastal, based upon the 2016-based household projections, “72.4% of new housing should be owner-occupied, 10.9% private rented, 6.3% should be Shared Ownership and 10.4% Social Rent/Affordable Rent.” The update goes onto state that there would be a potential demand for 397 discount home ownership dwellings in Suffolk Coastal (an affordable housing tenure). This figure is therefore deducted from the total requirement for private (market) rented accommodation (where the model
presumes they would otherwise be housed). This results in a requirement for 72.4% of new housing to be owner-occupied, 6.72% private rented, 6.3% to be Shared Ownership, 10.4% Social Rent/Affordable Rent and 4.13% discounted home ownership.

2.13 Collectively, this clearly suggests a market to affordable housing ratio of 79% to 21%.²

2.14 The affordable requirement of 1 in 3 new homes (33%) set by draft Policy SCLP5.10 is significantly higher than that identified within the 2019 SHMA update. There is no explanation why a higher percentage of affordable housing is sought. We do not believe there is justification for this higher affordable housing target.

2.15 We also note that Draft Policy SCLP5.10 sets out a specific tenure mix required for all major developments (50% affordable rent / social rent, 25% shared ownership and 25% discounted home ownership). Again, this affordable housing mix is inconsistent with the recommendations of 2019 SHMA update and therefore is not justified. Utilising the above figures, the recommended affordable housing mix should be (approximately) 50% affordable rent / social rent, 30% shared ownership and 20% discounted home ownership.

2.16 It is important for policies relating to the development and use of land to be properly scrutinised. As part of this the NPPF now requires viability assessments to be carried out by the local planning authority at the plan-making stage. This work should be undertaken as a priority to understand the impact of any affordable housing policy, particularly one which seeks a higher target, above that necessary to meet local need.

2.17 We also believe that it is important for the policy to reflect the new NPPF in other ways. For example, the NPPF makes clear that affordable homes should not be sought on sites of 10 or fewer dwellings. As currently drafted, Policy SCLP5.10 would require schemes of more than 1,000 sqm gross internal area to provide affordable housing as well. This is inconsistent with the Framework. The definition of ‘major developments’ at Annex 2 of the NPPF is now clear that for housing this means where 10 or more homes will be provided. There is no reference to floor areas. Consequently, Policy SCLP5.10 should be amended to remove reference to floor areas.

² (72.4% + 6.72% = 79% market) (6.3% + 10.4% + 4.13% = 21% affordable)
3. **Transport**

**Policy SCLP7.2: Parking Proposals and Standards**

**Question 4.22:** Is the Policy justified in seeking compliance with the 2015 Suffolk Guidance for Parking, East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy given that these documents do not form part of the development plan and is the Policy consistent with paragraph 105 of the Framework in respect of local parking standards?

3.1 Paragraph 7.13 of the Local Plan concerns electric vehicle parking provision and states: "The level of charging supplied should be commensurate with the number of vehicle parking spaces included in the development. However, higher levels of charging power will be supported, if considered appropriate and desirable."

3.2 Whilst Persimmon is supportive of the introduction of modern technologies such as electric vehicle charging, it is submitted that the above phrasing is vague and not effective. What is considered ‘commensurate’ is open to interpretation and may vary significantly between people and developments. Indeed, Paragraph 16 d) of the NPPF requires local plan policies to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

3.3 It is noted that the 2015 Suffolk Guidance for Parking contains specific requirements in respect of electric vehicle parking. If these are to be utilised, then the Local Plan should be re-worded to include a specific threshold or reference, based upon evidence and tested for viability as per the requirements of the NPPF.
4. Community Facilities and Assets

Policy SCLP8.2: Open Space

**Question 4.23:** Is the Policy consistent with national policy which sets out circumstances when existing open space, sports and recreational buildings including playing fields may be built on as set out in paragraph 97 of the Framework?

4.1 Draft Policy SCLP8.2 (Open Space) states: “New residential development will be required to contribute to the provision of open space and recreational facilities in order to benefit community health, well-being and green infrastructure.” Whilst Persimmon do not object to the provision of open space as part of residential development, clarity is sought as to the expected rate of provision per hectare. This should be grounded within the Local Plan evidence base.

Policy SCLP8.3: Allotments

**Question 4.24:** Would the Policy be effective and is it clearly written given the repetition between criteria a) and d)?

4.2 Similarly, Policy SCLP8.3 (Allotments) states: “The Council will encourage the provision of new allotments in order to meet a locally identified demand”, whilst the supporting text to this Policy states: “Proposals for new allotments will be preferred alongside residential allocations, master plans for the Garden Neighbourhoods or through Neighbourhood Plans which emerge over the plan period.”

4.3 Again, clarity as sought as to whether the Council expects a standard to be provided as part of residential development. Indeed, contrary to the above, there is no mention of allotment provision in any other policies in the Local Plan which relate to a specific allocation. Clarification is also sought as to the level of evidence required to demonstrate a need (or otherwise) for allotments, given that they may arise within future Neighbourhood Plans or planning applications.
5. Climate Change

_Policy SCLP9.2: Sustainable Construction_

**Question 4.27:** Is the requirement that all new developments over 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO₂ Emission Rate set out in the Building Regulations justified?

5.1 Policy SCLP9.2 requires all new developments of more than 10 dwellings to achieve energy efficiency standards that result in a 20% reduction in CO₂ emissions below the Target CO₂ Emission Rate (TER) set out in the Building Regulations. Exceptions will only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.

5.2 There is no evidence presented within the Local Plan as to why the standards set out within Building Regulations should be exceeded. Furthermore, as set out previously, the NPPF is clear that viability should be considered at the plan-making stage. It is therefore not appropriate to impose an onerous requirement through a local plan policy and then request a viability assessment at the decision-making stage.

5.3 The Policy goes on to state that all new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day. Again, there is no justification or evidence as to why this optional standard is being imposed on all new residential development.