HEARING STATEMENT
Suffolk Coastal Local Plan Examination
Matter 2 Issue C Distribution of Growth and the Settlement Hierarchy

Chris Edwards
Section One

Personal statement

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Section Two

Issue C: Whether the Plan sets out a clear strategy for the pattern of development consistent with national policy? (Policies 3.1, 3.2, 3.3 and table 3.1)

Distribution of Growth and the Settlement Hierarchy

2.17 Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?

Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

The Council will deliver an ambitious plan for growth over the period 2018 - 2036 in Suffolk Coastal by:

The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:

f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;

g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;

h) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;

NPPF

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1. The strategy is both unjustified inconsistent and significantly inappropriate in regard to locating such a large percentage of growth to Saxmundham. This paper addresses Policy 3.1 in depth.

2. In relation to Saxmundham, Policy 3.1 is not set on a secure base. The growth quantum for housing is predetermined for modelling purposes as an appropriate strategy. It has not considered reasonable alternatives based on proportionate evidence.
3. In this case reasonable alternatives are modelling reduced quantum for similar but not necessarily all the policy benefit to see if it could influence tenure and diversity.

4. Likewise the allocation of employment land on the scale proposed is in contradiction to the evidence base.

5. The submission plan has modelled strategic scale of growth in three of four areas (Site selection Topic Paper Document D 36 Para 6.12) and concluded the scale is suitable in all four of them.

6. However it has not modelled scale of growth in Saxmundham it has only modelled locations. That is inconsistent, especially since both Saxmundham and Felixstowe are proposed for significant growth and for Garden Neighbourhoods to accept that growth.

   Different scales of growth at Felixstowe;
   Different locations for growth around Saxmundham;
   Different scales of growth on the eastern edge of Ipswich;
   Different scales of growth on the A12 corridor.

8. No reasonable alternative of reduced scale of growth has been modelled in Saxmundham. Growth has been modelled instead on a split site basis and it was concluded that a unitary site was a better option for both employment and housing.

9. The unitary site is in fact tripartite and not unitary at all.

10. The core assumption is that a quantum of 800 homes is considered an appropriate scale of growth, and 800 homes is considered the only appropriate quantum.

11. The rationale for this assumption is found in Suffolk County Council's Topic Paper s 106 developer guide. A copy of this was submitted as evidence at Reg 19 and also by Leave the Layers Alone and is covered in more detail by myself in Matter 3: Policy 12.29 - education.

12. The paper sets out the 0.25 pupil per dwelling yield formula thus requiring 800 homes for a 210 place school.

13. To base 23% of new regional spatial growth on one paper written in 2014 is not to use proportionate evidence. In fact SCC are out of step both with national policy and other Local Authorities in this matter.
14. The evidence base does not justify this scale of housing development to generate a school and employment.

15. However this same pupil yield formula is being used to support scale applications in West Suffolk where Hopkins and Pigeon submitted Planning Application DC/15/2483/OUT. This was approved for “erection of up to 1250 dwellings and associated infrastructure. The ‘associated infrastructure’ includes a new primary school, “(CE note:315 place which equates to 0.25 pupils per dwelling).

16. Suffolk Council appears to model all strategic developments to this Topic paper. It does not use current evidence to model local yield and tenure requirements to inform accurate development and education requirements. Para 185 of the West Suffolk DC/15/2483/OUT officer report states “The proposed development generates the need for a new primary school.” It might as well say “the size of the proposed school generates the need for 1250 houses”.

17. Policy 3.1 as it applies to Saxmundham sets out a generic approach to building estates. It is not a spatial strategy, and nor is it suitable for modelling development need in Saxmundham based on evidence of any sort. It is effectively a developer business model for which the minimum requirement appears to be 1250 homes to make it work (e.g. Red Lodge in West Suffolk – 1250 homes with a 315 place school.

18. Neither zero growth – requiring no school - nor a mid range housing quantum have been modelled and discounted.

   **Zero growth**

19. The proposed scale of growth in Saxmundham is argued to be justified by the predicted fall in primary pupil roll and the consequent need to sustain the school cohort intake.

20. There is however no evidence on the examination database to show the expected fall in roll will threaten the sustainability of any of the three schools in the cohort, Saxmundham, Kelsale/Carlton and Benhall.

21. Absent such evidence, a zero growth option cannot be discounted in Saxmundham.

   **Mid range**

22. The appendixed education consultant paper in Matter 3 reflects the poverty of thinking that underpins growth assumptions for Saxmundham.
23. It shows that with a model of higher pupil yield fewer homes are needed to support a school.

24. Local evidence shows that pupil yield is declining in relation to the change in definition of affordable housing and a trend to build a higher percentage of smaller homes for market sale.

25. The Issues and Options process presented 2 spatial options for the town, a “unitary” option and split site options, based on 800 homes.

26. There were several split site options, all for 800 homes. One of these was for 550 homes and a school on site 714, and 250 homes on site 435 (omission site). A unitary option for development was selected instead of a two site option.

27. Site 435 was promoted as suitable for 475 homes and a school but only assessed for 250 homes. The amended site can bear a quantum of homes which with a suitable pupil yield multiplier of 0.38 can with other allocated sites sustain a new 210 place school.

28. The SCDC Consultation Statement p2019 states:
   “How these comments have been taken into account in the Final Draft Local Plan:
   The amended site 435 (along with site 559) has been re-assessed through the SHELAA and Sustainability Appraisal, however it is not of a scale that would enable the delivery of the scale of the proposed Garden Neighbourhood in a comprehensive manner. Beyond the tree line, development would be particularly sensitive in landscape terms, reflecting the conclusions of the Landscape Sensitivity Assessment. Site 716 has been included within policy SCLP12.29 as part of the re-drafting of the policy and indicative masterplan, within which the school, community uses and 800 dwellings are located between the A12 and the railway line. A split site approach has been considered through the consideration of alternative sites, however it was considered for reasons relating to landscape impact and transport impact that the approach to allocate land to the south is preferable.”

29. Evidence document D2 the WSP Transport Assessment for SCDC has modelled the transport impact of a split site of 800 homes without a school. P15 of 40 states:
   3.3.3. The above conclusion also applies to Saxonmundham, however as the Land South of Saxonmundham was included within our development assumptions and consists of approximately 800 dwellings and 559 jobs, the V/C link values surrounding the development have been presented.

30. As the school is a fundamental element of the spatial strategy to deliver 800 homes this is a surprising omission, and it is not possible to conclude the strategy is justified without assessing the impact of a key element of the policy
to the strategy.

31. It further states: “The site south of Saxmundham included in Model Run 8 - 800 dwellings and 559 jobs split across both sides of the A12” - Document d32 p 18 of 40.

32. Site 716 is a separate site as it is not between the A12 and the railway line, it is to the west of the railway line. The SSGN is thus not a unitary site, and there has been no comparative assessment of this spatial strategy, nor any proper assessment of the impact of the school on traffic flow in that location.

33. The three primary requirements for allocation are that sites should be available suitable and viable and site 435 has tested for all of these (Bailey Venning report for Leave the Layers Alone at Reg 18 refers for viability).

34. The evidence supplied by jeremy Smith for Saxmundham Town Council Neighbourhood Plan survey shows the local impetus is to scale development but moderated and a majority located to the east of the town and not to the south.

35. A significant percentage support a split site option using the site 435 as a master site for a school and a major allocation and site 714 as a servant site, which is possible up to 250 homes without a roundabout on a “hop on, hop off” travel basis.

36. The evidence to support the option for a unitary development is flawed and incomplete. Proportionate evidence required for such a major decision allocating 23% of new housing growth to one site in a small market town needs to be substantial. It is not.

37. The employment land appears to be an afterthought and further there are 2 conflicting measurements for the employment site one on the plan website 7ha and the other in the Aspinall Verdi report 13.5ha.

38. There is no specific reason why a Garden Neighbourhood is needed to support a new school or an employment site. The SSGN site is not in fact unitary at all; it is split in three and is divided by a road and a railway line and is therefore only a Garden Neighbourhood in name only not in spatial planning terms.

39. The matter of scale was noted in the Suffolk Coastal Local Plan Working Group 17th March 2017. Garden cities, towns, and villages: Cllrs commented on the potential of garden villages/towns in relation to a revitalisation in Ebenezer Howard’s work. It was noted that this is unlikely to be an option for this area although growth at
Adastral Park is similar given its scale.

40. Adastral Park is of a different order to Saxmundham proposals being over 2000 homes and with a critical mass and unconstrained land area. The same group noted school development:
Suffolk Coastal Local Plan Working Group 9.15am 23rd February 2018
“7 Part 1 – Infrastructure Cllrs discussed the problems surrounding the supply of new school places linked to development and the funding of new schools. It was considered that new schools should be allocated land where there is little or no development value.”

41. There has been no comparative value testing for school sites in Saxmundham to see where best value can be achieved for development. A more accurate way to reflect this aspiration to capture social value is to say that land of little or no development value needs more homes to support the cost of school development than land with a higher value. Higher value land might have a higher value and require fewer homes to generate a landowner and developer return because it has fewer constraints to depress its value.

42. Land values are heavily influenced by infrastructure costs – “what lies beneath” - such as drainage and access works costs, both of which are high cost items on the policy site 714. This point has been made in the Reg 19 Leave the Layers Alone submission document – hydrology report.

43. The misplaced approach to value described in para 31 has been applied to the policy 12,29. The result is a flawed strategy and selection of a site that is not viable using standard inputs – Bailey Venning Reg 18 report refers. On p9-12 the report notes evidence to support a reasonable alternative to the original split site garden neighbourhood. That evidence still holds good but was never examined or tested by the Council.

44. The original Reg 18 sites were transposed to the present arrangement without any form of comparative analysis other than on the basis of 800 homes

**Employment**

45. A key driver for housing and employment growth strategy was the Four village by pass. That is not being funded by Government.

46. The spatial strategy places 63% of the baseline employment land for the district in the town.

47. The minutes of the Suffolk Coastal Local Plan Working Group 9th November 2017 record a discussion about spatial strategy. Members discussed the following issues:
• The possibility of establishing a new settlement somewhere in the District.
• Looking at examples in other Districts such as Bedford where infrastructure was installed before development commenced.
• Areas of the District that possess the capacity for growth.
• Increasing distribution along the A12 corridor, subject to the construction of the Four Villages bypass.
• Question 11 – Members were of the view that higher housing figures do not necessarily result in housing that people can afford.

48. The spatial strategy for employment is thus no longer supportable. And the member view expressed in the above Question 11 comment is pertinent to the garden Neighbourhood allocation proposal and borne out by the work if Bailey Venning.

49. Furthermore, the Saxmundham area is assessed for secondary office accommodation in the Lichfield Study on the examination website. Plan. There is a glut in the area at the moment. The site is amber in the Lichfield report as noted in the Leave the Layers Alone submission and its success is predicated on the already allocated Carlton Park. Employment site, which is not fully developed yet.

50. The minutes of the Suffolk Coastal Local Plan Working Group 9.15am 3rd May 2018 state:
“7 Employment Policies Officers presented draft policies to members. Economic Development emphasised the business community in the district is comprised predominantly of very small businesses, which totals approximately 88% businesses in Suffolk Coastal. Therefore, identifying the correct business premises, including move on space, is vital for the success of local businesses and economies.”

51. The allocation of an enormous net area of up to 28,000 square metres of commercial space at 40% coverage on the edge of a small town, outside the settlement boundary, when an underdeveloped allocated employment site already exists in that same town cannot be justified in view of the comments in Para 40 above. This is not an appropriate strategy and does not take account of a reasonable alternative approach which is to develop out that allocated site first then consider further allocations based on the market need.
Conclusion

The spatial strategy 3.1. policy insofar as it refers to Saxmundham is not justified either for housing quantum or for employment land allocation and the evidence does not support a view that Policy 3.1 is an appropriate strategy to meet housing or employment on that scale in that small area.

The addition of further large sites to the allocation policies means the target now exceeds the Government Guidelines as noted by the Inspector. A rebase to a minimum of 542 dwellings per annum would then allow a more measured approach to development in the town. A split site option is less risky and potentially could still provide necessary social infrastructure if the site costs allow from this, and this can only be discovered by testing and comparing financial outputs, something that has not been done by the Council.