SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 20 AUGUST 2019

MATTER 2A – HOUSING PROVISION

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019
<table>
<thead>
<tr>
<th>Site Name:</th>
<th>Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich</th>
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<td>Client Name:</td>
<td>Bloor Homes Eastern</td>
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<td>Type of Report:</td>
<td>Hearing Statement – Matter 2A</td>
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<td>Date:</td>
<td>31st July 2019</td>
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Matter 2A – Housing Provision

1.0 Introduction

1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.

1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies this representation.

1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land, which lies to the north east of Lamberts Lane. This is being promoted as a medium-term opportunity by Bloor Homes for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.

1.4 This Hearing Statement is concerned with Matter 2A of the Examination Hearing programme, and specifically addresses Point 2.4 of the Inspector’s questions for Matter 2A.
2.0 Point 2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.1 Policy SCLP2.1 states as follows :-

*Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area*

Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:

- a) The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;

- b) The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and

- c) Supporting the continued role of Ipswich as County Town.

The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.

2.2 The four authorities of Ipswich Borough Council, Suffolk Coastal District Council, Mid-Suffolk District Council and Babergh District Council are presently progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities. In particular, with specific relevance to our client’s interests, the authorities (following the Inspector’s report in 2017 on the Examination of the now adopted Ipswich Local Plan) are working together in order to meet the housing need for the Ipswich Housing Market Area and agree the strategic distribution of development to meet that need.

2.3 In 2017 the Ipswich Local Plan Inspector reported as follows:

"28. Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-
published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019."

and

29. However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period"

2.4 The authorities have prepared a Statement of Common Ground (SoCG) (v4 March 2019) to address the strategic cross-boundary planning matters in the Ipswich Strategic Planning Area. Key extracts from that document regarding the approach to the delivery of the housing requirement are set out below:

"Process of reaching outcomes and agreements

The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities’ approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.

C1) The housing need calculated under the standard methodology will form the starting point for identifying housing requirements. The Suffolk Coastal First Draft Local Plan, published for consultation between July and September 2018, was based upon the need figures published by MHCLG in September 2017 under the ‘Planning for the Right Homes in the Right Places’ consultation. The NPPF was published in July 2018 and the Planning Practice Guidance updated in September 2018. The 2017 ratios of median workplace earnings to median house prices were published in April 2018 and the 2016-based household projections were published in September 2018. The Planning Practice Guidance has subsequently been updated in February 2019 to state that the 2014-based household projections should be used in
the calculation. Local housing need as calculated under the standard method will form the starting point in identifying housing requirements.

C2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.

C3) Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where the need cannot be met within the local authority’s boundary, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority’s local plan.

C4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority’s boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority’s local plan.

C5) Mix and type of housing: The Authorities published an update to Part 2 of the Strategic Housing Market Assessment in January 2019. This updates the size, type and tenure of housing needed, including the need for affordable housing, based upon the housing need calculated under the standard method.
C6) Strategic policies in emerging Local Plans are to reflect the outcomes above.

D. Consideration of bordering strategic housing developments

Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

Evidence

The Councils have jointly commissioned transport modelling (with Suffolk County Council). The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan. Further transport modelling of preferred options has been undertaken and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019. The Councils jointly commissioned a Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich. The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

Process of reaching outcomes and agreements

The conclusions of the above evidence have been, and will continue to be, considered in site selection and in identifying any necessary mitigation.
Outcomes and agreements

Land north east of Humber Doucy Lane is identified as a cross-border location for future development (within Ipswich Borough and Suffolk Coastal District) for housing delivery post 2031. This joint approach will help enable land within Ipswich Borough to come forward for housing. The relevant policies in Local Plans are:

- Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018), Policy ISPA4 ‘Cross Boundary Working to Deliver Sites’
- Suffolk Coastal Final Draft Local Plan (January 2019), Policy SCLP12.24 ‘Land at Humber Doucy Lane, Rushmere St Andrew’

2.5 The key points arising from this strategic cross-boundary co-operation are that the four authorities are presently planning to meet a housing need of 37,278 dwellings up to 2036. Secondly, the SoCG recognises that “due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich borough boundary”.

2.6 However, Policy SCLP2.1 as presently drafted fails to provide sufficiently clear and effective strategic policy guidance on the nature of the Plan’s “close functional relationship” with Ipswich Borough. In fact, Section 2 of the Plan entitled “Wider Strategic Planning Area”, containing Policy SCLP2.1, is generally not explicit on the potential strategic cross-boundary issues that will clearly affect both the Suffolk Coastal Local Plan and the emerging Ipswich Local Plan during the respective Plan periods. We give detailed consideration to Policy SCLP12.24 (Land at Humber Doucy Lane) in our Hearing Statement for Matter 3 (Communities surrounding Ipswich). However it should be noted at this point that Policy SCLP12.24 is not set in the context of meeting strategic, long-term cross-boundary objectives. In fact, it was an addition to the Plan’s housing allocations introduced into the Plan at a relatively late stage.

2.7 As we understand the position, there is presently no intention by the Suffolk authorities to prepare a statutory or non-statutory Spatial Development Strategy for the Ipswich
Strategic Planning Area. It will therefore fall to the individual Local Plans prepared by the constituent authorities to take forward the strategic policy issues identified by the Ipswich Strategic Planning Area Board.
2.8 In our submission, the Suffolk Coastal Local Plan does not yet address such issues with sufficient clarity, particularly as they will affect the later years of the Plan period. It is clear from the Preferred Options consultation of the emerging Ipswich Local Plan that the Borough Council foresee a long-term strategic direction of growth to the north-east of the existing Ipswich urban area. This is identified on the Key Diagram accompanying that consultation, as below:

**Diagram 3: The Ipswich Key Diagram**

![Diagram 3: The Ipswich Key Diagram]

2.9 We would suggest that this long-term approach, which clearly indicates the proposed “direction of travel” for the growth of Ipswich, and which has obvious cross-boundary implications with the strategy of the Suffolk Coastal Local Plan, should be reflected with greater clarity in that Plan, and specifically within Policy SCLP2.1.
2.10 Furthermore, the recent publication for consultation of three potential routes for the Ipswich Northern Route (the link between the A12 and A14) reinforces the need for the Plan to set out in greater detail the strategic planning context for that link road, which is described in the Factual Note prepared by the Council on 25 July 2019.

2.11 Our client’s land has key significance for the potential delivery of the Option C route, which is the southernmost and shortest route option. Whilst we clearly support that route option, it is not yet possible to pre-judge the outcome of the ongoing consultation. Nevertheless, we firmly consider that the Plan does need to contain a much clearer and fuller position statement by East Suffolk Council on the strategic planning implications of the proposed Link Road. In our assessment, it clearly recognises and endorses the long-term approach to the future growth of Ipswich, as being indicated in the emerging Ipswich Local Plan, which should be recognised in this Plan.

3. Conclusion and Proposed Change to Submission Local Plan

3.1 In the context of the long-term strategic cross-boundary planning matters being addressed by the Ipswich Strategic Planning Area Board, and described above, we do not consider that Policy SCLP2.1 is effective. It presently fails to address cross-boundary matters with sufficient clarity. Specifically, it does not recognise the “direction of travel” for the growth of Ipswich post-2031, being identified in the emerging Ipswich Local Plan, nor the strategic implications of the proposed Ipswich Northern Route, in so far as it will directly support new homes and employment growth.

3.2 We consider that the Policy should be modified to reflect the content of the Factual Note published on 25 July 2019, together with a fuller position statement by the Council on its strategic planning objectives for the delivery of the Link Road and the spatial implications for future growth in the Ipswich/Suffolk Coastal Local Plan areas. It is absolutely clear that these are significant cross-boundary matters which should be addressed in the respective Local Plans. We therefore request that the Inspector recommends that such modification be made to the Plan in order to address these points.
Appendices

Appendix A – Humber Doucy Lane Development Framework

Appendix B – Rushmere St Andrew Masterplan
Considerations

- Land subject to representation No.1
- Land subject to representation No.2
- Railway
- A - Road
- B - Road
- Minor road
- Track on site
- Public Right of Way
- Downward slope
- Noise pollution
- Required junction improvement
- Required road improvement
- Potential cycle lane
- Local authority boundary
- Contours (5M)
- Priority habitat - deciduous woodland
- Rushmere MX track
- Listed building
- Orchard

LAND AT HUMBER DOUCY LANE
**A Healthy Community**

The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places.

"When taking a place-based approach, healthy developments will not only help the local authority to improve population health in terms of both physical and mental wellbeing, but will also help the people who live and work in the area. A good example is planning for appropriate amounts of green space, which can lead to reduced health inequalities and can result in attracting the right workforce to work in the health and care system and in other local industries."

Source: TCPA, 2017, guide 8 creating health promoting environments.

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**A Complete Community**

New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over-reliance on a private car.

If well planned, the Land at Humber Doucy Lane, Ipswich, can be a self-sustaining community. The scale of the site presents an opportunity to create a new healthy garden community of up to 2,500 new homes at 35dph. New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over-reliance on a private car.

The Land at Humber Doucy Lane will not be a dormitory community, or a place which just uses ‘garden’ as a convenient label. We will set clear expectations for the quality of the environment and places, and planning permission will be conditional on the Local Authority’s approval of a Local Plan that meets the needs of its citizens, and neighbouring communities.
A Garden Community

The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government’s planning policies for England and how these are expected to be applied. The National Planning Policy Framework (NPPF) recommends Local Authorities plan for larger scale development (new settlements or extensions) following the principles of Garden Cities. In response to the Government’s Garden communities: prospectus we intend to submit the Land at Humber Doucy Lane for consideration.

The Land at Humber Doucy Lane will not be a dormitory community, or a place which just uses ‘garden’ as a convenient label. We will set clear expectations for the quality of the development and how this can be maintained. We want to see a vibrant, mixed-use, community where people can live, work, and play for generations to come – a community which view themselves as the conservation areas of the future. The Land at Humber Doucy Lane will be holistically planned, self-sustaining, and characterful.

A Healthy Community

Access to local facilities is fundamental to the concept of locating sustainable development. New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.

If well planned, the Land at Humber Doucy Lane, Ipswich, can be a self-sustaining community. The scale of the site presents an opportunity to create a new healthy garden community of approximately 5,000 people. A population of this order is enough to trigger a full range of facilities including shops, employment, leisure and education on-site to support daily life and provide a well-rounded community that meet the needs of its citizens, and neighbouring communities, over their lifetime.

A Complete Community

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NPPF, 2018, guide 8 creating health promoting environments.

A healthy community

Planning policies and decisions should aim to achieve healthy, inclusive and safe places.

"When taking a place-based approach, healthy developments will not only help the local authority to improve population health in terms of both physical and mental wellbeing, but will also help in achieving multiple local objectives and priorities within the wider place-making agenda, such as improving road safety, reducing air pollution, maximising environmental protection, or securing infrastructure investment to attract new residents and a skilled working population. Meeting these wider objectives can result in attracting the right workforce to work in the health and care system and in other local industries.

All this makes creating a high-quality living environment more than just a matter of addressing issues that adversely affect health. Addressing such multiple local priorities can also help to promote good health: the quality of the environment and the local socioeconomic context are contributing factors."

Source: TCPA, 2017, guide 8 creating health promoting environments.