Local Plan
Covering the former Suffolk Coastal area

Council Response to Inspector Questions – H2 (20/05/19)

May 2019

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This document has been prepared by East Suffolk Council in response to the Inspector’s additional questions (Document H2).

Below each question where required, the Council has provided a specific response along with associated information and tables.

Where document references have been provided, these are to those found in the Examination Document Library.

31 May 2019
Desi Reed – Planning Policy and Delivery Manager
East Suffolk Council

By email

20 May 2019

Dear Ms Reed

Examination of the Suffolk Coastal Local Plan

1. Further to my letter of 16 May 2019, I am writing with my initial questions relating the provision of employment land and in respect of sites for Gypsies, Travellers and Travelling Showpeople. Your responses to these further questions will also help to inform me how the Examination should proceed and to better focus the Matters, Issues and Questions (MIQs) for the Hearings.

Supporting and facilitating economic growth

2. Please would the Council highlight to me where I would find the most up-to-date and succinct explanation/justification for the Council’s approach to economic growth/jobs/employment land and floorspace. It would be very helpful for my Examination if the Council would provide a briefing note in this regard, which signposts me, with precise references to the relevant specific parts of the evidence as appropriate.

3. In the briefing note, please also address the following points:

Council Response: In responding to these questions, the Council has provided an answer to each of the questions in turn as opposed to providing a briefing note. The Council consider that answering the questions directly provides more focused answers and greater clarity for the Inspector.

a) In my initial reading, I have seen that the Plan and evidence base documents state different figures for the ‘baseline’ employment land requirement. For example, Policy SCLP3.1 refers to 11.7 Hectares (Ha), the first bullet point under the heading Ambitions for growth supporting
business and growth on page 29 states 13 Ha, whilst table 4.2 of Ipswich Economic Area Employment Land Supply Assessment Suffolk Coastal (D2) refers to 14.4 Ha. What is the minimum employment land requirement for the plan period and how has it been derived?

Council Response: In preparing the Local Plan, the Council has worked with neighbouring authorities¹ to consider economic needs, land requirements, sector requirements and identifying the Functional Economic Area. The evidence base is comprehensive and has provided a robust position on which to base the Local Plan policies.

The Employment Land Needs Assessment (Document D4) provided an update to the economic needs of each local authority area by 2031 in line with the NPPF and the PPG. The period to 2031, was considered the most appropriate at the time as this evidence was used in relation to the plan period of the Ipswich Borough Council Local Plan which was at examination stage in 2016.

Following the publication of the Employment Land Needs Assessment (Document D4) and the completion of the Ipswich Borough Council Local Plan examination (Ipswich Borough Council Local Plan adopted in 2017), the Council’s commissioned the Ipswich Economic Area Sector Needs Assessment (Document D3). The Sector Needs Assessment identified that the economic baseline land requirements were 14.4ha over the period 2014-3026 (22 years) as seen in Table 3.7 of Document D3 (page 31). This figure has been calculated using the East of England Forecasting Model (EEFM) and applies an appropriate plot ratio assumption to floor space estimates and local adjustments to reflect the pattern of development in the Ipswich Economic Area (Document D3, page 31, paragraph 3.27).

At the time of the Economic Sector Needs Assessment (Document D3) being undertaken, the 2014 EEFM figures were the most up to date to use. To ensure consistency between evidence base documents these were also used in the Ipswich Economic Area Employment Land Supply Assessment (Document D2). Note figures in Table 3.7 of Document D3 (page 31) are the same as those figures in Table 4.2 of Document D2 (page 14).

The land requirements identified through the EEFM, have then been used to inform the Local Plan documents published by Suffolk Coastal District Council (as well as those published by neighbouring authorities since 2017). During the preparation of the Local Plan, the authorities across the Ipswich Functional Economic Area have strived to ensure consistent plan periods, which all end in 2036 as seen in Section A (page 5) of the ISPA Statement of Common Ground (Document A13).

The Council’s Issues and Options document (Document B1) and the First Draft Local Plan (Document B4) both used the plan period 2016-2036 (20 years). Along with neighbouring authorities, the Council agreed to amend the baseline figure of 14.4ha to reflect the 20 year plan period which resulted in an annual average being calculated (14.4ha / 22 years). The annual average was then multiplied by the plan period (20 years) to result in a figure of 13ha which was included within the documents at that time.

¹ Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council (now East Suffolk Council).
Between the publication of the First Draft Local Plan (Document B4) and the Final Draft Local Plan (Document A1), the neighbouring authorities agreed to amend the plan period to better reflect the requirements of the Planning Practice Guidance in respect of housing supply. The agreement between authorities and plan periods is detailed in section E1 (page 13) of the Ipswich Strategic Planning Area Statement of Common Ground (Document A13). Due to the agreed position in respect of plan period from 2018-2036, the Council therefore once more recalculated the land requirement over an 18 year plan period to result in a figure of 11.7ha as seen in Policy SCLP3.1.

In line with the economic evidence that underpins the Final Draft Local Plan (Document A1), the minimum employment land requirement is 14.4ha, for the period 2014-2036. When this requirement is then adjusted to reflect the Local Plan period of 2018-2036 the baseline requirement is amended to 11.7ha.

The figure of 13ha as seen in the box on page 29 of the Final Draft Local Plan (Document A1), is a typographical error – this should read 11.7ha to ensure consistency with the figures outlined in Policy SCLP3.1.

b) The Plan is seeking to supply significantly more employment land than the baseline requirement. It is not clear however how much additional employment land is proposed over the plan period, or whether the existing allocations carried forward form part of the baseline provision. Please highlight where I can find the total figure of additional employment land proposed, or otherwise please provide confirmation of it.

**Council Response:** The Final Draft Local Plan (Document A1) includes a number of allocations for employment land. Some of these are existing employment areas (from the Site Allocations and Area Specific Policies Development Plan Document (Document F2) and the Felixstowe Peninsula Area Action Plan Development Plan Document (Document F3)) which have been reconsidered and carried forward. These existing employment areas are listed in paragraph 4.12(page 60) of the Final Draft Local Plan (Document A1) and contribute to the provision of employment land across the former Suffolk Coastal district and are monitored accordingly. Large parts of the existing employment areas are already developed and operational, but these areas were included within the East of England Forecasting Model to determine the current provision of employment land across the Ipswich Functional Economic Area.

To ensure continued provision of employment land across the district (former Suffolk Coastal area), a number of new allocations for employment land have been identified within the Final Draft Local Plan (Document A1). The new allocations and their site areas are clearly identified in Table 1 below.

The Final Draft Local Plan (Document A1) does not include a total figure of additional employment land proposed however the Council can confirm that an additional 96.62 ha is identified in the Final Draft Local Plan (Document A1) and detailed in Table 1 below. When this figure of 96.62ha is subtracted from the 11.7ha requirement identified in Policy SCLP3.1, a total of 84.92ha employment land is provided across the district.
Table 1 – Final Draft Local Plan employment land allocations

<table>
<thead>
<tr>
<th>Policy</th>
<th>Policy Name / Location</th>
<th>Existing Employment Areas (ha)</th>
<th>New Allocation (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SCLP12.7</td>
<td>Port of Felixstowe</td>
<td>466.73</td>
<td></td>
</tr>
<tr>
<td>SCLP12.8</td>
<td>Land at Bridge Road</td>
<td>0.73</td>
<td></td>
</tr>
<tr>
<td>SCLP12.9</td>
<td>Land at Carr Road/Langer Road</td>
<td>10.44</td>
<td></td>
</tr>
<tr>
<td>SCLP12.10</td>
<td>Land at Haven Exchange</td>
<td>5.09</td>
<td></td>
</tr>
<tr>
<td>SCLP12.20</td>
<td>Land at Felixstowe Road</td>
<td>22.53</td>
<td></td>
</tr>
<tr>
<td>SCLP12.21</td>
<td>Ransomes, Nacton Heath</td>
<td>29.95</td>
<td></td>
</tr>
<tr>
<td>SCLP12.29</td>
<td>Land south of Saxmundham</td>
<td>7.09</td>
<td></td>
</tr>
<tr>
<td>SCLP12.35</td>
<td>Land at Innocence Farm</td>
<td>67</td>
<td></td>
</tr>
<tr>
<td>SCLP12.36</td>
<td>Former airfield, Debach</td>
<td>10.96</td>
<td></td>
</tr>
<tr>
<td>SCLP12.37</td>
<td>Carlton Park, Main Road, Kelsale</td>
<td>7.82</td>
<td></td>
</tr>
<tr>
<td>SCLP12.38</td>
<td>Levington Park, Levington</td>
<td>4.23</td>
<td></td>
</tr>
<tr>
<td>SCLP12.39</td>
<td>Land at Silverlace Green, Parham</td>
<td>2.26</td>
<td></td>
</tr>
<tr>
<td>SCLP12.40</td>
<td>Former airfield Parham</td>
<td>5.74</td>
<td></td>
</tr>
<tr>
<td>SCLP12.41</td>
<td>Rendlesham (Bentwaters)</td>
<td>382.25</td>
<td></td>
</tr>
<tr>
<td>SCLP12.42</td>
<td>Riverside Industrial Estate, Border Cot Lane</td>
<td>2.01</td>
<td></td>
</tr>
<tr>
<td><strong>Total (ha)</strong></td>
<td></td>
<td>928.21</td>
<td>96.62</td>
</tr>
<tr>
<td><strong>Total Combined (ha)</strong></td>
<td></td>
<td>1024.83</td>
<td></td>
</tr>
</tbody>
</table>

c) Where would I find the justification for the proposed provision of employment land providing ‘significantly more’ than the baseline requirement and above that to meet anticipated needs over the plan period?

**Council Response:** The East Suffolk Business Plan (Document G1) is clear in its desire to grow employment opportunities across the district (both the former Suffolk Coastal and former Waveney areas) and continue to play a central role in the economic growth of the country. The Council believes that a strong local economy is essential for vibrant local communities in East Suffolk and the Local Plan policies can play an important role in this belief.

The Norfolk and Suffolk Economic Strategy (Document D5) identifies on page 12 the economic sectors which give the local economy its real strength. Specifically within the district, the energy sector, the ICT, Tech and Digital Creative and Transport, Freight and Logistics sectors are significant for this Local Plan. The East Suffolk Business Plan (Document G1 page 6) complements the Norfolk and Suffolk Economic Strategy and also identifies that enterprises such as the Port of Felixstowe, BT and Sizewell Nuclear Power Station play a significant role in the local economy and these operations should continue to be supported over the plan period.

The relationship between employment land growth and employment growth isn’t a direct correlation and the Final Draft Local Plan (Document A1) has taken a positive approach to ensuring that land is
made available for employment purposes. The Ipswich Economic Area Sector Needs Assessment (Document D3) identifies the most appropriate locations (paragraphs 2.22-2.24, page 9 and Figure 2.12, page 23) to support the key business sectors in the district, such as the Business and Professional Services, Transport and Logistics and Wholesale and Distribution sectors. The variety of sites identified for economic purposes in the Final Draft Local Plan (Document A1) ensures that a range and choice of employment sites are provided across the district to create the conditions in which businesses can invest, expand and adapt in East Suffolk as required in paragraph 80 of the NPPF.

In response to the Local Plan Issues and Options document (Document B1), the Port of Felixstowe identified that port land is in short supply and coming under pressure, which over the plan period will increase due to demand not being met in Felixstowe and along the A14 corridor. Acknowledging the economic role of the Port of Felixstowe and the needs of that sector, the Council commissioned the Port of Felixstowe Growth and Development Needs Study (Document D1).

The Port of Felixstowe has an international role and the needs of operations which support the activities of the Port are unique in terms of land needs and requirements and therefore need to be considered separately. Particular land requirements in relation to the Port of Felixstowe (Document D1) are considered necessary to ensure that the operations of the Port can be supported fully by third party businesses in the supply chain network. Operations of this nature are land hungry and are best located (both for economic and environmental reasons) in close proximity to the Port itself. The Ipswich Strategic Planning Area Statement of Common Ground (Document A13) outlines in paragraph E3 under the outcomes and agreements on page 14 that the specific needs for off port land requirements will be met within East Suffolk (former Suffolk Coastal District) area. Identifying new employment land to serve this sector enables logistics and haulage type operations to plan on a comprehensive scale and provide confidence for inward investment in the area. A piecemeal approach which did not make significant provision for this sector may result in a disjointed approach across the area which may have detrimental impacts on the existing employment areas.

Further employment land has also been identified at Felixstowe Road (Policy SCLP12.20) for the Business and Professional Services sector in a location which is well matched to market demand area seen in the Ipswich Economic Area Sector Needs Assessment (Document D3, page 57, figure 5.9). Additional employment land has also been identified in Saxmundham (Policy SCLP12.29) to provide economic opportunities in relation to the principles of Garden Neighborhoods such as reducing the need to travel. Integrating land for economic opportunities as part of the Garden Neighborhood will ensure that the Local Plan achieves sustainable development in Saxmundham.

In order to facilitate and continue economic growth in the key sectors across the district, the Final Draft Local Plan (Document A1) has taken a positive approach to land provision to meet these identified needs. The Council acknowledge that the employment land identified is significantly more than the baseline requirement (identified in Policy SCLP3.1), but has sufficient justification established through a robust and objective evidence base to meet the anticipated needs of the district’s economy over the plan period.
d) Has the forecast of additional jobs (6,500) which would be created during the plan period taken into account the proposed provision of employment land in the Plan? If not, are there potential consequences of this for the future jobs forecast and the development and infrastructure provisions of the Plan?

**Council Response:** The forecast of additional jobs to be created over the plan period results from the East of England Forecasting Model (EEFM) as outlined in paragraph 3.6 of the Ipswich Economic Area Sector Needs Assessment (Document D3). The EEFM provides breakdown by sectors and reflects recent trends and projections at the regional level and takes into account the current post recession economic climate. Table 3.1 of the Ipswich Economic Area Sector Needs Assessment (page 26, Document D3) identifies the baseline jobs growth over the period 2014-2036 (22 years) as being 7,940 in the former Suffolk Coastal district. When this figure is recalculated to reflect the plan period 2018-2036 (18 years), the projection is 6,500 jobs (rounded). Neighbouring authorities have agreed to reflect the evidence in the same way as outlined in the Ipswich Strategic Planning Area Statement of Common Ground (Document A13) in section E1 found on page 13.

The EEFM forecast (August 2016) was undertaken with existing employment allocations and permissions already accounted for. However the forecasts do not include the new employment allocations as identified in Table 1 above. The forecasts provide a “business as usual” view of growth and do not take account of planned developments or policies as detailed in paragraph 16.12, page 202 of the Ipswich Sector Needs Assessment (Document D3).

Across the district (former Suffolk Coastal area), the acutely ageing population and lower unemployment than the national and regional average (as detailed in paragraphs 1.5 and 1.21 of the Final Draft Local Plan (Document A1)) brings limitations in the ability of the local area to generate the required workforce over the plan period. Encouraging employment opportunities which enable people to move from lower paid to better paid employment will translate into higher earnings in real terms instead of additional jobs over the plan period.

The Council anticipates that the additional employment land allocated in the Final Draft Local Plan (Document A1) will have an impact on the number of jobs created in the district (former Suffolk Coastal area) over the plan period, but this is not anticipated to be significant. Over the plan period, the size and nature of the new employment allocations will be monitored and kept under review given the uncertainties around employment forecasts and the type of activities expected on the new allocations. However, it is widely acknowledged that the ratio between floor space and jobs is entirely dependent on the operations taking place. For example, warehousing requirements can demand large amounts of floor space but provide relatively few jobs, whereas office developments may require smaller amounts of floor space but provide a greater number of jobs.

The Final Draft Plan considers any potential consequences of development and infrastructure over the plan period and outlines requirements that each site allocation needs to take account of. Individual planning policies and area specific allocations along with infrastructure requirements as detailed in Appendix B of the Final Draft Local Plan (Document A1) clarify needs which have been developed in partnership with stakeholders.
Gypsies, Travellers and Travelling Showpeople

4. The submitted Plan does not make any allocations for sites for Gypsies, Travellers or Travelling Showpeople. Policy SCLP5.17 does not identify what is the need for such sites over the plan-period, nor the immediate need so as to identify what is the required 5 year supply of pitches and plots.

Council Response: To confirm, the Final Draft Local Plan does not make allocations for sites for Gypsies and Travellers or Travelling Showpeople.

Paragraph 5.90 of the Final Draft Local Plan (Document A1) sets out the needs related to Gypsy and Traveller accommodation, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, May 2017 (Document D17) (hereafter referred to as Accommodation Needs Assessment). This refers to the need for 15 pitches for permanent accommodation in the Suffolk Coastal area (Appendix 1, page 120) and the need for 2 to 3 short stay stopping sites across the ‘study area’ (which is the area covered by the 2017 assessment) (paragraph 6.32, page 75).

Paragraph 5.91 of the Final Draft Local Plan (Document A1) sets out the needs for plots to meet the needs for Travelling Showpeople, as identified through the Accommodation Needs Assessment (Document D17)(Appendix 1, page 125).

Further information in relation to this position is provided in response to question 5 below.

5. In order to reflect national policy, I would normally expect a local plan to state in a policy that provision will be made for specific numbers of pitches and plots (for Gypsies/Travellers and Travelling Showpeople respectively) for the whole plan-period, as identified in an up-to-date needs assessment; confirm what is the immediate need (to assess whether there is the required 5 year supply) and, where a plan is making allocations to meet at least the 5 year supply of land for conventional housing, make allocations to at least provide the 5 year supply. If a plan does not do so, there should be very good reasons why.

Council Response: Paragraph 9 of Planning Policy for Traveller Sites (2015)² states that ‘Local planning authorities should set pitch targets for Gypsies and Travellers as defined in Annex 1 and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.’

Paragraph 10 states that ‘Local planning authorities should, in producing their Local Plan:

- Identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets
- Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible for years 11-15
- Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density;
- Protect local amenity and environment.

The numerical targets for the Plan period are currently set out in paragraphs 5.90 and 5.91, as set out above. The response below is set out separately in relation to the needs for permanent pitches for Gypsies and Travellers, the needs for short stay stopping (or ‘transit’) provision for Gypsies and Travellers and the needs for plots for Travelling Showpeople. The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, May 2017 (Document D17) considers these needs separately, and this is reflective of the Planning Policy for Traveller Sites which sets out different definitions for Gypsies and Travellers and for Travelling Showpeople, and in paragraph 7(b) distinguishes between the needs for ‘permanent’ and ‘transit’ accommodation.

**Permanent pitches for Gypsies and Travellers**

Gypsies and Travellers are defined in Annex 1 of Planning Policy for Traveller Sites (2015).

Paragraph 5.90 of the Final Draft Local Plan set out the needs related to Gypsy and Traveller accommodation, as identified through the Accommodation Needs Assessment (Document D17).

The needs for permanent pitches for Gypsies and Travellers identified in the assessment, are shown below in Table 2 (split into five year periods) (taken from page 120 of the Accommodation Needs Assessment).

**Table 2: Accommodation needs for permanent pitches for Gypsies and Travellers**

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent pitches</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>15</td>
</tr>
</tbody>
</table>

Note that the need relates to 2016 – 2036 due to the point in time at which the assessment was undertaken.
The Accommodation Needs Assessment (Document D17) identifies the need for permanent pitches in Suffolk Coastal as relating to the population of New Travellers. The existing population of New Travellers in Suffolk Coastal reside on two unauthorised sites, as referenced in paragraph 5.28 of the Accommodation Needs Assessment, which together comprise of 10 pitches. As the sites are unauthorised these therefore in themselves generate a need for 10 pitches within the Accommodation Needs Assessment, as identified in Appendix A of the Assessment. The remaining 5 pitches needed over the Plan period relate to new family formations expected to arise from within existing family units on this site. Paragraph 6.3 of the Accommodation Needs Assessment explains that the first five year period is determined by the survey responses (carried out as part of the assessment) and that future five year periods are determined by projections.

Whilst there is a need for 12 pitches in the first five years of the period covered by the Accommodation Needs Assessment, it is necessary to consider this in light of the characteristics of that need. Paragraph 2.21 of the Accommodation Needs Assessment refers to the situation as described in the current adopted Core Strategy and Development Management Policies (2013) (Document F1), which acknowledges that the groups of New Travellers have existed in Suffolk Coastal for 20 years or so and that this is a lifestyle choice. Paragraph 11.19 of the Accommodation Needs Assessment recognises that the need could be met through options other than the provision of an alternative site or sites, through for example authorising unauthorised development.

The Council undertook a ‘call for sites’ exercise in 2016, as explained in the Strategic Housing and Economic Land Availability Assessment (Document D10). Whilst ‘Gypsy and Traveller pitch’ was included as an option in the list of uses for which sites could be submitted, no sites have been submitted for Gypsy and Traveller use through the ‘call for sites’ or through subsequent consultations undertaken as part of the production of the Local Plan.

Policy SCLP5.17 sets out a framework for the consideration of planning applications to meet the needs for permanent pitches, which is consistent with the criteria set out in paragraph 13 of Planning Policy for Traveller Sites.

In light of the circumstances surrounding the current population of Gypsies and Travellers and the need identified, it would not be appropriate for the Council to seek to meet the need described above through the provision of a site allocation or allocations in the Local Plan.

**Plots for Travelling Showpeople**

Travelling Showpeople are defined within Annex 1 of Planning Policy for Traveller Sites (2015).

Paragraph 5.91 of the Final Draft Local Plan sets out the needs for plots to meet the needs for Travelling Showpeople, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, May 2017 (Document D17). To clarify, this need is for 2 plots, the figure of 4

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3 Note that the glossary in the Accommodation Needs Assessment (Document D17) identifies that New Travellers were formerly referred to as New Age Travellers.
referred to in paragraph 5.91 relates to the total provision in Suffolk Coastal once this need is provided for.

The needs for permanent pitches for Gypsies and Travellers identified in the assessment, are shown below in Table 3 (split into five year periods) (taken from page 125 of the Accommodation Needs Assessment (Document D17)).

Table 3: Accommodation needs for Travelling Showpeople

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travelling Showpeople plots</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
</tbody>
</table>

Note that the need relates to 2016 – 2036 due to the point in time at which the assessment was undertaken.

Paragraph 7.15, page 80 of the Accommodation Needs Assessment (Document D17) identifies that there is one authorised Travelling Showpeople yard in Suffolk Coastal which consists of 2 plots occupied by an extended family. Appendix A of the Accommodation Needs Assessment identifies that the need relates to family units seeking residential plots in the area and to new family formations expected to arise from within existing family units.

The Council’s approach to providing for this need is to provide a policy framework which would support new provision where this meets with the criteria set out in the Policy. This is consistent with paragraph 11.17 of the Accommodation Needs Assessment which suggests that the need could be met by increasing provision on the existing site. Policy SCLP5.17 in the Final Draft Local Plan (Document A1) therefore provides a framework for the consideration of any planning applications which is consistent with the criteria set out in Paragraph 13 of Planning Policy for Traveller Sites.

**Short stay stopping sites**

Paragraph 7(b) of Planning Policy for Traveller Sites distinguishes between identifying needs for permanent or transit accommodation. Transit accommodation is referred to as short stay stopping sites in the Accommodation Needs Assessment (Document D17).

Paragraph 5.90, page 106 of the Final Draft Local Plan (Document A1) sets out the needs for short stay stopping sites. The need for short stay stopping sites is for 2 to 3 sites across the study area over the period 2016 - 2036 (which is the area comprising the former Suffolk Coastal District, Babergh District, Mid Suffolk District, Ipswich Borough and the former Waveney District). This need is not broken down into an annual need within the Accommodation Needs Assessment (Document D17).
The Councils across Suffolk have established an agreed way of working in order to bring forward short stay stopping sites to meet the need identified. This is explained in the Council’s Local Development Scheme (Document E1) (paragraphs 26 – 29, pages 5&6). This agreed way of working across Suffolk has been progressing, and recently a Special Projects Officer – Gypsies and Travellers has been appointed to take forward the work of delivering three sites across Suffolk. This position is reflected in the Council’s Private Sector Housing Strategy (2019 – 2023)\(^4\) which states, on page 8, that the Councils across Suffolk have jointly funded a post to deliver a solution to the need for short term transit sites in the County. The Private Sector Housing Strategy sets a specific action for the identification of a short stay stopping site within East Suffolk for operation by 2021 and states that a small number of possible sites have been identified and that work is underway on progressing feasibility studies (see page 24 - 25).

The Private Sector Housing Strategy relates to the full East Suffolk Council area, and therefore the appropriate site may be outside of the area covered by the Suffolk Coastal Local Plan.

In light of the above agreed approach to address the needs for short stay stopping sites, it would not be appropriate for the Local Plan to allocate sites to meet this need.

6. It would be helpful if the Council would consider what potential modifications could be made to the Plan, reflecting these national planning policy requirements, in order to advance matters during the Examination.

Council Response: The Council considers that modifications could be made to Policy SCLP5.17 and to the supporting text to that policy to clarify the position in relation to meeting needs for Gypsies and Travellers, as set out in response to questions 4 and 5 above.

The Council considers that modifications could be made to the supporting text to Policy SCLP5.17 to include the breakdown of need for permanent sites for Gypsies and Travellers and Travelling Showpeople over the Plan period. The Council considers that reference could be included in the supporting text to clarify that the needs for permanent pitches for Gypsies and Travellers relate largely to the unauthorised nature of existing sites. The Council also considers that the needs for permanent sites for Gypsies and Travellers and Travelling Showpeople could be included within Policy SCLP5.17.

The Council considers that reference could be included in the supporting text to explain the current position in relation to identifying short stay stopping sites to meet needs across Suffolk. The Council also considers that the approach to delivering sites to meet the needs for short stay stopping sites could be stated within Policy SCLP5.17.

To indicate the modifications that the Council considers would provide these clarifications, possible changes are set out in Table 4 below. (Note, potential deletion of text shown as strikethrough and potential addition of text shown as underlined).

The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (2017) identifies Suffolk Coastal as ‘unique’ in the eastern region in that it has a relatively stable population of New Age Travellers and concludes that there is a need for 15 permanent Gypsy and Traveller pitches over the period 2016 – 2036. This need relates largely to the unauthorised nature of sites on which the existing population of New Travellers reside. The need over the period 2016 – 2036 is set out below.

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent pitches</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>15</td>
</tr>
</tbody>
</table>

Move existing text from 5.90 to new paragraph:

The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area. The Council is working with other authorities across Suffolk to deliver the need for short stay stopping sites, as set out in the East Suffolk Private Sector Housing Strategy (2019 – 2023).

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5 Area on a site developed for a family unit to live
The District also has one, long-established Travelling Showpersons site. The Accommodation Needs Assessment identifies a need for 4.2 plots for Travelling Showpeople in Suffolk Coastal over the period 2016 - 2036. The need over the period 2016 – 2036 is set out below.

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travelling Showpeople plots</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
</tbody>
</table>

Policy SCLP5.17: Gypsies, Travellers and Travelling Showpeople

The Council will support the provision of permanent sites for Gypsies and Travellers and Travelling Showpeople, to meet the needs identified through the 2017 Accommodation Needs Assessment as set out below:

- **Policy SCLP5.17:**
  - *a)* Provision of 15 pitches to meet the needs for permanent accommodation for Gypsies and Travellers;
  - *b)* Provision of 2 plots to meet the needs for Travelling Showpeople.

The Council will work with other Councils across Suffolk to deliver identified needs for short stay stopping sites, including the delivery of one short stay stopping site within East Suffolk.

Sites for Gypsies and Travellers and Travelling Showpeople will be permitted where:

- **Policy SCLP5.17:**
  - *a)* The proposed occupants meet the definition of ‘Gypsies and Travellers’ or ‘Travelling showpeople’ as set out in ‘Planning Policy for Traveller Sites’ (2015) (or subsequent revisions);
  - *b)* The site is within, adjacent to or well related to a Major Centre, Town, Large Village or Small Village. Where the requirement for a site is linked to the education or health needs of the occupants the site must be well related to locations...
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>where these services are provided;</td>
</tr>
<tr>
<td>c)</td>
<td>The site is capable of being provided with mains water and adequate sewage/waste disposal provision (including the storage of waste prior to disposal);</td>
</tr>
<tr>
<td>d)</td>
<td>The site is acceptable in terms of highway safety;</td>
</tr>
<tr>
<td>e)</td>
<td>The site is designed so as to minimise visual impact on the surrounding area and landscape character, and does not dominate the nearest settled community;</td>
</tr>
<tr>
<td>f)</td>
<td>The site is not located in flood zone 2 or flood zone 3;</td>
</tr>
<tr>
<td>g)</td>
<td>Any industrial, retail, commercial, or commercial storage activities to take place on the site must be ancillary to the primary use of the site for residential purposes and must not harm the amenity of occupants of the site or surrounding areas;</td>
</tr>
<tr>
<td>h)</td>
<td>The scale and range of uses proposed within the site are acceptable in terms of their impact on any existing neighbouring uses; and</td>
</tr>
<tr>
<td>i)</td>
<td>Where it is intended that a site should be self managed by the occupants, the capacity of the site should not normally exceed 8 pitches.</td>
</tr>
</tbody>
</table>

Where the proposal is for a Travelling Showpersons site (or extension to an existing site) sufficient space for storage of vehicles and equipment will be provided.

Neighbourhood Plans may allocate sites for Gypsy and Traveller use.
7. The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, May 2017 (D17) appears to provide the necessary information to achieve the above requirements on identified needs.

**Council Response:** The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, May 2017 (Document D17) has been produced in accordance with Planning Policy for Traveller Sites (2015) and Draft Guidance to Local Housing Authorities on the Periodical Review of Housing Needs for Caravans and Houseboats (2016). It provides the necessary information as set out in the responses to questions 4-6 above.

**Boat Dwellers**

8. In respect of provision for boat dwellers, please confirm whether the it is intended that the need for additional residential moorings would be met within areas designated under Policy SCLP5.15.

**Council Response:** The Council confirms that the need for additional residential moorings is intended to be met within areas designated under criterion (a) of Policy SCLP5.15, pursuant to the other criteria set out in the policy and any other relevant policies. These areas are shown on the Policies Maps.

**Conclusion**

9. I would be grateful for your response to these questions by 31 May 2019, after which I will be able to complete my MIQs. If that is not possible, please provide me with a timetable for your response.

10. Please publish this letter on the Examination website.

Yours sincerely

*Philip Lewis*

INSPECTOR
Write to us

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