INDEPENDENT EXAMINATION OF THE SUFFOLK COASTAL LOCAL PLAN

MATTER 3 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 3 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, which forms part of a wider site referred to as ‘Site 520’ in the Council’s evidence base.

1.3 Matter 3 pertains Area Specific Strategies - Development Allocations and concerns the following issue:

**Issue: Are the proposed Area Specific Strategies, allocations and policies justified, effective and consistent with national policy?**

1.4 This statement considers the *General Questions Relevant to all Proposed Site Allocations*, as well as those questions proposed in respect of *Communities Surrounding Ipswich*. It does not consider questions related to all other settlements.
2. GENERAL QUESTIONS RELEVANT TO ALL PROPOSED SITE ALLOCATIONS

Policy SCLP12.1: Neighbourhood Plans

Question 3.1: What is the justification for the indicative minimum dwelling figures set out in Policy SCLP12.1?

2.1 The supporting text to Policy SCLP12.1 (Paragraph 12.6) states: "In identifying numbers, consideration has been given to the strategy of the Local Plan and the position of the settlement in the Settlement Hierarchy.”

2.2 Persimmon submits that, not only is this insufficient evidence to justify such a strategy, it also does not appear to be accurate. For example, had the position of a settlement within the settlement hierarchy been taken into consideration, it is submitted that Kesgrave (a ‘Major Centre’ in the first/top tier of the settlement hierarchy) would be afforded a greater minimum requirement than 20 dwellings. Indeed, there are settlements beneath Kesgrave within the settlement hierarchy that are afforded a greater number of dwellings through neighbourhood plans.
3. Communities Surrounding Ipswich

Policy SCLP12.18: Strategy for Communities Surrounding Ipswich

3.1 Question 3.23: Would the strategy be effective in addressing the potential impacts of development on the transport networks consistent with the policies of the Framework?

3.2 As set out in our response to Matter 2C Question 2.17, the SA does not refer to the findings of the various Transport reports that make up the Evidence Base, whilst the Interim Sustainability Appraisal predates the earliest report examining the strategic impact of the preferred strategy upon the network. The final SA also predates the final WSP Transport Reports issued in January 2019.

3.3 It is therefore difficult to see how the potential impacts of development on the transport networks has been properly considered.

3.4 The majority of development identified for Communities Surrounding Ipswich is to be delivered at Brightwell Lakes. Whilst the site is located to the east of Ipswich, it is separated both physically and in terms of public transport accessibility by the A12, a major barrier to sustainable transport options to accessing Ipswich. While Brightwell Lakes will deliver much needed housing within the District, this will predominantly serve the employment land at Adastral Park and relate to Martlesham Heath. Brightwell Lakes will inevitably lead to a rise in private car use as residents commute to central Ipswich, creating greater pressure on the transport network.

3.5 The Plan allocates two other strategic housing sites around Ipswich; SCLP12.24 Land north of Humber Doucy Lane and SCLP12.25 Suffolk Police Headquarters. While these sites would provide opportunities for sustainable development with good public transport links, they are not scheduled to come forward within the first five years of the Plan period, with SCLP12.24 not planned for development until 2033. In light of this, it is our position that while they represent sustainable allocations, they do not meet the immediate needs of the East of Ipswich area. Furthermore, as set out in our response to Matter 2A question 2.6, the Brightwell Lakes development has fallen behind its indicated delivery trajectory, further restricting the number of dwellings that will be delivered in this area within the first five years of the Plan period.
3.6 Paragraph 12.178 of the Plan’s supporting text for Policy SCLP12.18 states that the Plan does not seek to identify any large-scale developments which could potentially blight future options for a Northern bypass around Ipswich, further restricting choice of housing sites with potential to service Ipswich.

3.7 Elsewhere in the plan, paragraph 2.16 (preceding text to Policy SCLP2.2) suggests that, as plans for a northern strategic road around Ipswich become clearer, the Council will consider through a review of the plan the opportunity to bring forward development which can contribute financially to the new road. This approach is inconsistent with the South Saxmundham Garden Neighbourhood proposals, which indicate that 800 dwellings will be allocated now to support the provision of infrastructure in this part of the district.

3.8 The approach of relying on a review of the plan is also, we suggest, inconsistent with the requirements of the NPPF in paragraph 22, which states that; “Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” Therefore, as the plan does not engage with the future northern route around Ipswich, it is inconsistent with paragraph 22 and is therefore unsound.

3.9 Identifying land to the south of Kesgrave for housing could support the provision of a northern strategic road, outside of the CIL regime if the council chooses, whilst not blighting its route.