Suffolk County Council Statement on Matter 4: Policies

Issue: Are the individual policies clear, justified, consistent with national policy and effective?

Housing Policies

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?

1. NPPF paragraph 91 states that plan policies should “support healthy lifestyles, especially where this would address identified local health and well-being needs” and paragraph 92 states that planning policies should “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. As the lead public health authority and the social care Authority in Suffolk, housing is an important element of the County Council’s strategy to ensure older people in Suffolk have a good quality of life. This is one of the county’s four health and wellbeing priorities.

2. Suffolk’s Joint Strategic Needs Assessment\(^1\) highlights that appropriate housing is part of improving independence and social inclusion of older people and others who may be less mobile. Social isolation is a contributing factor in a significant proportion of preventable illnesses (prioritising prevention being one of the main four principles for improving the wellbeing for the people of Suffolk). Living in homes that can be adapted as people’s mobility changes means that people can be independent and continue to be an active part of their communities for longer. This in turn can reduce admissions to hospital and institutional care.

3. The Joint Strategic Needs Assessment also forecasts how the demographics of the county are expected to change. It is forecast that the proportion of people over 65 will increase compared to other age groups in the population, and Suffolk already has a population older than the English average, indicating that a high proportion of M4(2) compliant new homes is appropriate.

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\(^1\) [https://www.healthysuffolk.org.uk/jsna](https://www.healthysuffolk.org.uk/jsna)
4. It is noted that a number of objectors to this policy highlight that it is more likely to be younger people who move into new homes. While the County Council does not dispute this (although the aging population as stated above also needs to be considered) it is important to highlight M4(2) standard ensures that the homes are adaptable for changes in mobility in the occupants. While younger people move in initially it is likely that they, or future occupants will require changes to the dwelling to suit their needs.

5. Furthermore, new M4(2) standard homes, in offering additional benefits to older people and those approaching older age, could help to free up more family housing for younger people. In this way, M4(2) housing could have a wider benefit than just for older people.

6. For these reasons the County Council consider that the 50% requirement for dwellings built to M4(2) standards is justified and consistent with national policy.

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

1. Please see the County Council’s response to question 4.6, above. The M4(2) standard, in enabling modifications if mobility needs change, will help more older people to remain in their own homes.

2. The policy also sets out a positive and supportive approach toward housing with care.

**Question 4.12 - Would criterion b) of the Policy be effective in dealing with the transport implications of proposals?**

1. The County Council explained its position on this matter in its statement at the Regulation 19 consultation stage (Rep ID 1077) and is pleased to have common ground with the planning authority on this matter, with an agreed approach to amending the policy.

**Transport**

**Question 4.19 - What is the justification for the thresholds for Travel Plans and Transport Assessments and is the Policy consistent with paragraph 111 of the Framework?**

1. The Framework, in paragraph 111, sets out that all development which generates a significant amounts of movement should be accompanied by a transport statement or assessment. No national thresholds are established for determining what is a significant amount of movement, or when a travel plan should be required.
2. The thresholds for transport assessment and transport statements in the draft policy are based on those in the 2007 Department for Transport publication, ‘Guidance on Transport Assessment’\(^2\), being the last specific Government steer on this matter. The County Council considers that this figure still represents good practice.

3. The County Council has published guidance on Travel Plans, which includes thresholds for Travel Plans based on guidance from the Department for Transport (Good Practice Guidelines: Delivering Travel Plans through the Planning Process). The thresholds in the draft policy reflect this approach.

4. It is important to note that the policy describes the thresholds for transport assessment and statements as indicative and the specific circumstances of a particular development will also be taken into account when deciding how the transport impacts of a development should be assessed.

5. It is the County Council's experience that the specific local highway and environmental context of a development is a relevant factor in determining whether a site should be assessed via a transport statement or transport assessment. This approach has been considered robust at various appeals (such as the 49 dwellings permitted at Green Road, Woolpit, Suffolk by appeal reference APP/W3520/W/18/3194926).

**Question 4.20 - Would criterion f) be effective in seeking public transport in rural areas only and is that consistent with national policy?**

1. Please see Suffolk County Council’s statement on question 2.35 and the accompanying Statement of Common Ground with the District Council on this matter.

2. The County Council’s position is that the Plan, and this policy in particular, needs a robust and effective approach for promoting sustainable transport and modal shift. Public transport can support sustainable choices in rural areas and the plan must take all policy-compliant opportunities to maximise modal shift in new development.

3. The Framework sets the following requirements:

   84: Development in rural areas must ensure that it ‘exploits any opportunities to make a location more sustainable’.

   98: Planning policies and decisions should ensure that opportunities to enhance the public rights of way network and provide better facilities for users are taken up.

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102: In part c), opportunities to promote walking, cycling and public transport are taken up.

104: Planning policies should minimise the number of journeys needed, align (with highway authorities) strategies and investments in sustainable transport and provide for high quality walking and cycling.

**Question 4.21 – Would the Policy be effective in preventing significant impacts on the highway network.**

1. Via a Statement of Common Ground, the County Council has agreed a proposed amendment to this policy with the District Council.

2. The Framework, in paragraphs 108 and 109, sets out several tests in respect of considering the impacts of development on the transport network. Whilst it is not specified as a sequential approach; of taking up opportunities for sustainable travel, then ensuring safe access, then cost-effectively mitigating significant impacts on the network; this is a logical way of considering the assessment process as it is clear that, in referring to ‘residual’ impacts in paragraph 109, there is a distinction between these steps and the severe test.

3. This is relevant because an absence of severe impacts does not negate the need to limit any significant impacts; in respect of both capacity and safety.

4. This needs to be incorporated into the development plan to receive the full weight accorded by s38(6) of the 2004 Act, and the County Council welcomes the amendment to policy 7.1 agreed with the District Council.

**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?**

1. Whilst the 2015 Parking Guidance (as amended) is not a development plan document, this does not mean that it cannot be given weight by a development plan document.

2. The parking guidance has been developed using a body of evidence which justifies the recommendations within the guidance. The evidence base; of local survey and census data; is set out in Appendix 1 of the Guidance.

3. The parking guidance itself was subject to public consultation between June and August 2014, and feedback from the consultation was taken into account in the final drafting of the document before it was formally adopted by the County Council’s Cabinet.
4. The Guidance is consistent with the Framework and, in respect of the requirements set out in paragraph 105, the Guidance:

a) Recognises that the accessibility of the development (by non-car modes) may effect the number of car parking spaces required, and also recognises the requirements of the Equality Act 2010 to consider the needs of disabled people,
b) Sets specific standards for different use classes,
c) Allows for lower numbers of spaces where there is good access to public transport,
d) Has set parking requirements based on analysis of local car ownership levels as identified through the Census; and
e) Sets requirements for electric vehicle charging points and supports parking for low emission vehicles.

Climate Change

Question 4.30 – Is the requirement for phasing of development justified?

1. It is helpful to highlight in policy that water infrastructure (which would also cover SuDS) is phased to ensure infrastructure is delivered at appropriate stages of development. Surface water flood risks also need to be managed through the construction process. The Water Cycle Study highlights that Suffolk Coastal is in a water stressed area, which justifies the need for development to be managed in conjunction with necessary water infrastructure.

Built and Historic Environment

Question 4.36 - Is criterion h) clear?

1. The District Council have proposed a modification to this policy which is clearer, more concise and still prioritises pedestrian and cycle movements. Therefore, the County Council supports this modification as set out in a Statement of Common Ground.

Question 4.40 – In respect of proposals which would result in the loss of a non-designated heritage asset, is the Policy consistent with national policy as set out in paragraph 197 of the Framework in terms of the significance of a building?

1. The County Council does not advise local planning authorities in respect of historic buildings; its role is in respect of the Historic Environment Record and below-ground assets (archaeology).

2. It may be worth noting that, in respect of this question, policy SCLP11.7 covers below-ground assets which may not be designated due to the fact that they
have not been discovered. The policy establishes a principle of preservation in situ, but the strategy for managing treatment of archaeological remains will be carried out in accordance with the significance of the asset (as described in paragraph 11.41).