Suffolk Coastal Local Plan Examination

Hearing Day 3

Matter 2F Infrastructure

Note on viability of mitigation measures

1. This note responds to an action arising in the hearing session on Matter 2F Infrastructure (Thursday 22nd August, AM) which relates to the provision of a note confirming how the modifications put forward on transport mitigation relate to the conclusions of the Whole Plan Viability Assessment (Document D38).

2. The Council’s responses to Inspector’s question 2.35 (Council’s Matter 2F Statement, page 1-7), question 3.23 (Council’s Matter 3 SCLP12.1 – SCLP12.33 Statement, page 24-27) and question 4.21 (Council’s Matter 4 Statement, page 25-30), explain and set out modifications related to securing mitigation measures to address the cumulative cross-boundary impacts from growth on the transport network in and around Ipswich. The modifications relate largely to Policy SCLP2.2 Strategic Infrastructure Priorities and Policy SCLP7.1 Sustainable Transport, as well as modifications to the Infrastructure Delivery Framework. Modifications to Policy SCLP12.18 Strategy for Communities Surrounding Ipswich are also identified in reflection of the impacts on the highways network being identified in the Ipswich area, and the modifications that are put forward in relation to policies SCLP2.2 and SCLP7.1. The modifications result from additional work that has been undertaken to add clarity to the mitigation measures that would be required, and have been agreed through a Statement of Common Ground with Suffolk County Council (and with Highways England in relation to Policy SCLP2.2).

3. The Whole Plan Viability Study (Document D38) identifies Section 106 and Community Infrastructure Levy as outputs of the assessment, as set out on pages 52 to 53 of the assessment in relation to the typologies of residential development that have been tested, and on pages 56-57 and 59-60 for the South Saxmundham Garden Neighbourhood and the North Felixstowe Garden Neighbourhood respectively.

4. The Whole Plan Viability Study considered whether policies in the Final Draft Local Plan would have a high, medium or low impact on viability (Document D38, page 28 and Appendix 1).

5. Policy SCLP2.2 Strategic Infrastructure Priorities, as contained in the Final Draft Local Plan (Document A1, page 20), was assessed as having a high impact on viability. The costs for delivering SCLP2.2 were identified as being through either Section 106 and/or through Community Infrastructure Levy, as set out in Appendix 1 of the Study, and it is considered that any costs to be
provided through Section 106 or CIL would be captured through the surpluses identified. Policy SCLP2.2 reflects the strategic infrastructure priorities as agreed through the Ipswich Strategic Planning Area Statement of Common Ground. The costs associated with the delivery of specific projects that have been identified and that are related to the delivery of growth as planned for through the Local Plan, are set out in the Infrastructure Delivery Framework in Appendix B of the Final Draft Local Plan. Funding for some of these ‘larger’ projects are identified as being from a number of sources with the potential for some developer contributions.

6. The modifications to Policy SCLP2.2 identified through the Council’s Matter 2F Statement include a commitment to working with other authorities in the ISPA to ensure that there is a co-ordinated approach to funding the mitigation measures identified. This policy would not set out the development management approach to securing contributions, which would appropriately sit within Policy SCLP7.1, and therefore the conclusions related to Policy SCLP2.2 in the Whole Plan Viability Study remain applicable. Modifications have also been put forward in relation to a number of the projects identified in the Infrastructure Delivery Framework, in particular those related to junctions on the A14, through the Council’s Matter 2F Statement. These modifications provide further certainty over the costs associated with improvements to the strategic road network, and identify amounts which are lower than the total costs which had been set out in the Final Draft Local Plan. The Statement of Common Ground between the Council, Suffolk County Council and Highways England identifies, on page 3, a series of cost-effective and deliverable measures to resolve identified link and junction capacity problems arising from growth.

7. Policy SCLP7.1 Sustainable Transport, as contained in the Final Draft Local Plan (Document A1, page 121) was assessed through the Whole Plan Viability Study as having a low impact on viability. The Whole Plan Viability Study refers in Appendix 1 to the policy requirements being a current requirement and that it is assumed they would be covered through professional fees.

8. The modifications set out under Policy SCLP7.1 include that development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth. It is anticipated therefore that there would be a cost to the developer associated with this modification. The total anticipated costs are set out in the modifications put forward in the Council’s Matter 2F Statement relating to the Infrastructure Delivery Framework. The relevant modifications shown in the Infrastructure Delivery Framework are in the rows identified as ‘Sustainable transport measures in Ipswich’ and ‘Infrastructure improvements to support sustainable transport measures’. It is these measures which are anticipated to be funded through the ‘strategies’ referred to in the modifications put forward for Policy SCLP7.1, and the costs are reflective of the costs outlined in the strategy drafted by Suffolk County Council which is appended to their Matter 2 Statement (pages 86-87). The costs are anticipated to total around £6,600,000 to £8,000,000.

9. The Whole Plan Viability Study was undertaken by Aspinall Verdi. Following the hearing session on Matter 2F where the Inspector had queried how the costs relate to the Whole Plan Viability Study, the Council has had further discussion with Aspinall Verdi to provide clarity for the Inspector around
this. It is acknowledged that Policy SCLP7.1 will clearly have a cost impact however it is considered that this would be captured through the Section 106 or Community Infrastructure Levy surplus identified through the Study.

10. To summarise, Policy SCLP2.2 has been identified in the Whole Plan viability Study as having a ‘high impact’ on costs and Policy SCLP7.1 has been identified as having a ‘low impact’ on costs. The modifications put forward in relation to transport mitigation measures place a requirement for developer contributions within Policy SCLP7.1. Whilst the details around funding mechanisms are to be worked up and agreed with the ISPA authorities, it is considered that these will be accommodated within the Section 106 and CIL surpluses identified in the Whole Plan Viability Study, and should be viewed alongside the modifications to costs and funding sources associated with strategic transport infrastructure.