

Suffolk Coastal Local Development Framework Core Strategy & Development Management Policies

# Housing Distribution - Updated Preferred Option 7/09

Consultation (Regulation 25) Sept 2009



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#### 1 Introduction

- 1.01 The District Council is preparing a new type of plan that will replace the Suffolk Coastal Local Plan (including First and Second Alterations). This will be called a Local Development Framework (LDF) which will act as the blueprint for how the district will grow and change up to 2025, setting out the principles as to where and how developments in the future will be acceptable. The new LDF comprises a series of documents. The first and most important of these documents is the Core Strategy
- 1.02 The Core Strategy document provides the overarching approach to development, setting out the vision and principles that other Local Development Documents will be expected to accord. Once adopted, it should be possible just from the Core Strategy to state whether or not any development proposal, for whatever use, size or location, is acceptable in principle. It is vitally important therefore that the Core Strategy is right. It is for this reason that the Council is progressing with the Core Strategy ahead of other documents such as the Site Specific Allocations document. No decision will be taken in respect of individual sites submitted to the Council until the Core Strategy has been all but agreed.

### 2 The Core Strategy consultation to date - in brief

- 2.01 The content of the Core Strategy is necessarily wide ranging covering a range of topics that are key to the future of the communities of Suffolk Coastal, including the economy, transport, community well-being, the environment etc. as well as housing. For many aspects other than housing distribution the Core Strategy document has now achieved a measure of support. For this reason this current consultation focuses on changes to the housing distribution element.
- 2.02 The District Council is now inviting comment on changes to the broad distribution of new housing within the District as proposed in the Updated Preferred Option 7/09, considered by the Council's Cabinet at their meeting on 7<sup>th</sup> July 2009. The changes are being put forward specifically to address concerns raised in response to the Preferred Option 12/08, consultation on which finished in February 2009, and also to recognise other changes in circumstances since the content of the Preferred Option 12/08 was formulated earlier in 2008.

#### How many homes?

2.03 The total number of new homes needed in the district by 2025 has not changed and remains at 7,710<sup>1</sup> new homes, around 450 per annum. In addition, it is a requirement of national planning policy (PPS3 – Housing) for local authorities to set out in their Development Plan Documents the strategy for enabling a continuous delivery of housing for at least 15 years (measured from the date of the Core Strategy being finally adopted by the Council i.e. 2010). This should demonstrate the identification of a "flexible, responsive supply of land".

#### The phasing of the homes

- 2.04 The fifteen year period should be broken down as follows:
  - First 5 years (2010 2015) sufficient and specific deliverable sites should be identified
  - Second 5 years (2015 2020) specific, developable sites should be identified

 $<sup>^1</sup>$  7710 dwellings is the residual amount of new housing to be provided over the period 2008 - 2025 to meet the extended RSS requirement. i.e. total new housing requirement 2001-2025 minus new housing completions 2001 - 2008.

- Final 5 years (2020 2025) where possible, specific and developable sites should be identified. Where it is not possible to identify specific sites, broad locations for future growth should be indicated. If the Council can demonstrate a strong case of historical windfall (unpredictable) sites, then these may be included in housing projection assumptions but this can only be included in the final 5 year period, due to their uncertain nature.
- 2.05 In addition to the explicit recognition of the three phases above, the key changes in the housing distribution strategy include:
  - Reducing the amount of housing proposed for the Felixstowe/Walton and Trimley villages
  - A substantial increase in the amount of new housing within the Ipswich Policy Area<sup>2</sup> east of the A12 at Martlesham
  - A modest increase in provision at the market towns
  - A reduction in the number of new homes that could be expected to come forward as small 'windfall sites' <sup>3</sup>(e.g. building on side gardens; replacing one large dwelling with two or more new ones etc).
- 2.06 The Council is maintaining its strategy of concentrating new housing at the major centres, market towns and larger villages remains the same, as does the strategy of development east of the A12 at Martlesham being in a single location forming a new community, but adopting a dispersed strategy for development in Felixstowe/Walton/Trimley.
- 2.07 Comments are now sought solely in respect of these limited aspects of the Updated Preferred Option 7/09 which are different to the Preferred Option 12/08 Strategy. A summary of the Updated Preferred Option 7/09 is provided on page 13.
- 2.08 The following sections set out the background to the process so far and more detailed information on how the housing distribution was originally drawn up and the reasons for the changes now suggested.

## 3 Background – what has influenced the Core Strategy to date

#### How much new housing is needed?

3.01 Since 2004, Suffolk Coastal has regularly consulted with local residents, town and parish councils, businesses, services, utility providers, developers, landowners and others over how best to meet the identified housing needs for the District up to 2025.

3.02 New housing provision is certainly the most contentious issue covered by the LDF Core Strategy, but the needs are clearly apparent in a number of broadly consistent contexts, namely:

1) Future needs are assessed at a regional level (The Regional Spatial Strategy - East of England Plan 2008<sup>4</sup> (RSS)) and are based on population forecasts to assess the amount of new housing, jobs, education, leisure, health provision etc. that will be

<sup>2</sup> In Suffolk Coastal district, the Ipswich Policy Area refers to the area covered by the parishes of Brightwell, Foxhall, Kesgrave, Little Bealings, Martlesham, Nacton, Playford, Purdis Farm and Rushmere St. Andrew

<sup>&</sup>lt;sup>3</sup> Small windfall sites are sites which come forward on an irregular basis, but which cumulatively can contribute a significant number of new homes. For this reason government guidance states that council's should not rely on these as a source of housing within the first 10 years of their plans. The "small windfall" allowance is therefore included within Phase 3 (2020 – 2025). Small windfall sites which are built during the first 10 years still count towards the overall housing requirement and will be taken into account in future reviews of the LDF.

<sup>&</sup>lt;sup>4</sup> RSS – It is noted that the RSS is currently the subject of its own review. That review is looking at possible new housing options for the period to 2031. It has no impact on the housing numbers to be accommodated in the current Suffolk Coastal Core Strategy document on which comments are now sought.

required over the period 2001 - 2021 across the Eastern Region as a whole, and then on a District by District basis. The Government requires that each Council's LDF must show how it will meet these housing numbers as a minimum. For Suffolk Coastal, this district housing figure is 10,200 new homes between 2021 and 2021 or 510 new homes per year. However, the LDF must cover a 15 year period (i.e. 2010 – 2025) hence it is necessary to add a further 4 years at the same annual rate, a further 2,040 homes. The RSS housing requirement is also then sub-divided between the Suffolk Coastal part of the Ipswich Policy Area (IPA) and the rest of the district.

- 2) There is a very consistent long-term trend for the average number of people per household to reduce, due to various social trends. Hence even if there were no increase in population, more homes are needed, not least because people are living longer, often at home rather than in care homes, marital/relationship break-ups create a need for two homes rather than one, and young people are leaving home earlier. This trend is steady, amounting to about 10% change over 15 years. Beyond those factors, within Suffolk Coastal, there is also a trend for people moving here for both work and retirement.
- 3) At a local level the Strategic Housing Market Assessment 2008 also confirms that the structure of population will change due to falling birth rates, longer life expectancy and the effect of migration. It highlights the marked growth in the number of older people as a percentage of the forecast population to 2021 and the fact that they are concentrated in the owner-occupied and social rented sectors.
- 4) In determining the level of new housing provision, the overall regional strategy is also one which promotes economic growth. In relation to Suffolk Coastal it acknowledges the wider economic role that the Port of Felixstowe and BT research and development at Martlesham Heath play both nationally and within the Haven Gateway sub-region<sup>5</sup>. This wider economic role was an additional factor taken into account when the district housing numbers in the RSS were set. At the same time, the RSS also broadly recognises that the quality of much of the Suffolk Coastal countryside, its soils and the wildlife it supports are of national and in some cases international importance.

#### Where should the new housing go?

- 3.03 It is the role of the District Council through its LDF Core Strategy and the consultation that it involves, to decide where this new development, particularly housing, should take place, taking into account what new housing has already has been built between 2001 and 2008 (the base date for the Core Strategy). In doing so it has to take on board all of the sometimes conflicting issues balancing local, regional, and national priorities. Ensuring that the necessary infrastructure is there to support new development be it roads, healthcare, education etc. is recognised as being critical to maintaining the quality of life currently enjoyed by the local community.
- 3.04 In addition to the consultation which has taken place to date, and to further help inform the decision making process at the district level, the Council has commissioned a number of additional studies. These studies provide the detailed evidence to ensure that any decision taken in relation to new development is soundly made. A list and brief explanation of each study is provided at Appendix 1 together with a summary of findings for the very recent studies. The evidence base includes an independent study of Felixstowe (The David Lock Study), commissioned in 2005, to look specifically at Felixstowe to identify what could be done to mitigate several negative trends in respect of it's projected evolution as a town and as a seaside resort.

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<sup>&</sup>lt;sup>5</sup> Haven Gateway Sub-Region spans part of north-east Essex and south-east Suffolk.. It is focussed on the key centres for development and change of Colchester and Ipswich, the towns of Clacton, Felixstowe and Harwich and the major ports at Felixstowe and Harwich (Bathside Bay)

### How will the Core Strategy be finally agreed?

- 3.05 Inevitably, for a plan such as this, not everyone will be happy with what is proposed. It is partly for this reason that the final say on the matter will rest with an independent Planning Inspector whose role it is to say whether or not the Council's strategy is justified, effective and consistent with national policy. It is only following that stage that the Core Strategy finally becomes adopted. Any new development that takes place after that will be expected to accord with what is in the Core Strategy.
- 3.06 Appendix 3 sets out the process to date; where we are now; and the next steps through to adoption. It includes references to all of the relevant committee reports for those who wish to follow the matter in more detail. The table shows that we are already a long way down the road towards finalising what the long term Vision and Strategy for the district should be. The Council would like at this stage to thank all of those people and organisations who have taken the time to comment to date, and whose views have helped shape, and re-shape the Core Strategy to where it now stands.
- 3.07 Appendix 2 also shows that following the current consultation on the Revised Housing Distribution, there will be one final opportunity for the public to make comments. Comments given at the "Submission stage" will be to help inform the independent Planning Inspector in their assessment as to the "soundness" or otherwise of the plan. Before we get to that stage it is therefore important that everyone has the opportunity to comment on this outstanding issue, the Updated Preferred Option 7/09 Housing Distribution.

# 4 So what is this Revised Housing Distribution Strategy consultation all about?

- 4.01 This consultation is **very focused.** It is seeking views on the Updated Preferred Option 7/09 **housing distribution** that the Council is now putting forward, and whether or not you think that the reasons behind the changes are:
  - Justified; and
  - Will ensure that the necessary broad housing strategy for the District will be better met as a result of these changes.
- 4.02 The basic principles behind how the houses are distributed remain the same. In short this means concentrating development at the larger settlements where most people already live and work, and where facilities and services are concentrated. It is also where external partners such as the providers of public transport, health and education will be looking to, and will be encouraged to invest.
- 4.03 It must be emphasised that there is no change to the amount of new housing which the Core Strategy must provide. This number is fixed at the regional level and represents the minimum amount of new housing the District must provide for. It is how those numbers are distributed across the district which has altered, particularly for the major centres and towns, since the last round of consultation, i.e. what percentage of the new housing provision is now to be apportioned to each settlement or settlement type.
- 4.04 It is also important to bear in mind that these houses will not all come at once. Wherever new housing occurs across the District it will be phased between 2008 and 2025. This translates to an annual provision of some 155 homes within the Ipswich Policy Area and 295 homes across the rest of the district.

# 5 How has the housing distribution been drawn up? And how and why has it changed?

- 5.01 In order to be able to comment on the revised housing distribution, it is important to understand the logic behind it. The following paragraphs explain in more detail how and why the housing distribution strategy has come about and how and why it is proposed that it now be changed.
- 5.02 This process starts by looking at broad principles as to where development should be directed, and then more specifically at the opportunities and constraints for each of the main settlements or settlement types. The scales of development are those set down in regional guidance (RSS) with which the District Council has to comply as well as being in general accordance with other national planning policy guidance.

#### **Setting the Principles**

### Step 1-The Settlement Hierarchy

- 5.03 The most important "places" which the Core Strategy addresses are the 100+ individual settlements large and small across the district, because these provide the location for homes, jobs, services etc. Their character and location provide other historic and cultural links between individual communities, and their built and natural environments.
- 5.04 The 2001 census recorded that some 65% of the district population lived within the towns of Aldeburgh, Felixstowe, Framlingham, Leiston, Saxmundham and Woodbridge and within the Ipswich Policy Area. The population of individual towns varied between around 2,700 and 24,000. A large variation exists in population density between the more very sparsely populated north of the district, and the southern areas closer to Ipswich.
- 5.05 In order to begin to make sense of this very large number and variety of settlements, the Council devised and sought views on a Settlement Hierarchy. The role of the Settlement Hierarchy is to provide a framework for considering more detailed development issues. The Settlement Hierarchy has been well received and supported with few amendments.

#### How does the Settlement Hierarchy work?

- 5.06 The Settlement Hierarchy operates on two levels. It looks at what facilities exist now as well as what function or role a settlement plays. It then looks to the future, identifying what type and scale of development is appropriate for each town or village in the coming years. Individual settlements are listed against the appropriate level within the Hierarchy (see Table 1, Appendix 5). The Settlement Hierarchy also sets out the scales of new development that are considered acceptable and appropriate for each type of settlement and level within the Hierarchy (see Table 2, Appendix 5). This has not changed and clearly shows that in relation to housing most new development is to be directed towards the major centres and market towns, with very much smaller scale development at the Key and Local Service Centres.
- 5.07 The Revised Settlement Hierarchy now proposed is set out in Table 1, Appendix 5. The amendments it contains relate principally to where an individual settlement had been placed within the Hierarchy.
- 5.08 Note for all those settlements listed as "Other Villages" or "Countryside" no change is proposed in terms of the revised housing distribution. Those settlements are not proposed to have any allocations of new homes.

# Step 2 Individual Strategies and policies produced for the Major Centres and Towns, together with a more general approach to development at Key and Local Service Centres.

- 5.09 Following on from the Settlement Hierarchy, individual strategies and policies were then drawn up for each of the major centres and market towns, setting out how each is envisaged to grow and evolve to 2025. A more general approach to development at settlements identified as Key and Local Service Centres and "Other Villages" and "Countryside" was adopted given the numbers of settlements involved. The scales of development set for the major centres, market towns and more generally for the other settlements reflect those set out in the Settlement Hierarchy, but refined to reflect individual circumstances such as historic character, flood risk, the need for regeneration etc. Again this approach and the strategies themselves were generally well received, attracting few, other than minor comments. The main concerns related to the area East of Ipswich and Felixstowe/Walton and the Trimley villages where the bulk of the new homes are proposed. It is essentially in response to these issues that the original housing distribution strategy is now proposed to be revised.
- 5.10 As noted, this approach as a means of dealing with future development needs has been generally supported and is reflected in the feedback we have received as follows:-
  - New housing should not be provided in isolation, but should be built where facilities already exist or could be upgraded or provided;
  - Any new or improved infrastructure should be provided in advance of or in parallel with new development;
  - We should look first to re-developing old "brownfield" sites before looking to identifying new greenfield sites; (these are however limited in number and scale)
  - The road, rail and other public transport networks should be capable of accommodating the traffic and journey requirements that new housing inevitably brings with it;
  - New housing should allow integration with existing communities but at the same time should respect and maintain the character of individual settlements and communities;
  - In deciding where new development should go, it should respect the quality of the local environment;
  - Protection should be given to wildlife and to the landscape, particularly those areas that are designated as being of national and international importance;
  - That housing and jobs should be provided in tandem; and
  - Building on high quality agricultural land should be avoided as far as possible.

# Step 3 Produce a housing distribution strategy based on the principles set out above, which meet the regional requirements and comply with national planning policy guidance.

- 5.11 There are a number of smaller steps or tasks that need to be taken to produce the housing distribution.
  - Establish/confirm the number of new homes still to be provided to meet the RSS requirement.
    - A base date of March 2008 was used for the last round of consultation and for comparison purposes this base date has been retained.i.e.

To meet as a minimum the RSS requirements, adjusted to the 2025 LDF end date (an additional 4 years), and for the 4530 homes already built between 2001 and 2008 i.e

RSS total requirement 2001-2021	10,200	(510 p.a.)
Add 4 years at 510 p.a.	2,040	
Total requirement 2001 – 2025	12,240	
LESS built 2001-2008	4,530	
Net requirement 2008–2025	7,710	(454 p.a.)

- Identify the different means or sources by which these new homes will be provided.
  - In simple terms this relates to outstanding planning permissions, known brownfield opportunities, new greenfield allocations and other small infill type developments (e.g. building on side gardens) which tend to occur on a regular basis, but which cannot be predicted precisely.
- Identify in broad terms the scale and distribution of development, giving reasons.

#### Why are the new homes being shared out in the proposed way?

- 5.12 As noted, the broad scale and distribution of development has evolved and refined over time as a result of public consultation. Importantly each round of consultation has received more and more comments. Further changes have been brought about by the need to update information on housing completions and outstanding planning permissions on an annual basis. The underlying objectives i.e. the reasons for the distribution however have not changed and remain as follows:-
  - To provide a continuous 5 year housing land supply as required by national government
  - To provide for a range of size and type of site across the district, but concentrating strategic and large scale development at the main urban areas and towns, whilst maintaining flexibility to provide more limited housing provision elsewhere.
  - To provide sufficient housing at Felixstowe/Walton and Trimley Villages to meet the regeneration needs of the area as identified in the David Lock Study. Of the four scenarios suggested in that Study, Scenario 3 was the one favoured by the Council as best meeting these needs;
  - To provide new housing where it will support new employment provision and has the optimum opportunity for providing new and improved infrastructure to support it;
  - Limiting any adverse impact of new development on existing communities, countryside and wildlife
  - To make best use of known "brownfield" development opportunities; and
  - To provide a high quality, sustainable living environment for all residents, new or existing
- 5.13 Appendix 3 tracks the various consultations and changes to date and includes references to the relevant committee reports and minutes as well as to the background study information available at the time. Key reference points are the Further Issues and Options potential strategic housing areas consultation Feb 2008 and the Preferred Option 12/08 consultation in December 2008.

#### The Further Issues and Options Report Feb 2008

- 5.14 Proposals for implementing the above three steps were published in the Further Issues and Options Consultation, which targeted specifically the East of Ipswich and Felixstowe/Walton and Trimleys as the two main areas where strategic levels of housing growth were proposed. The marked locations represented broad areas or directions where such large scale development could potentially occur. These areas together with the final choice are set out below.
- 5.15 It should be noted that in December 2008, the Council also published the Site Specific Allocations & Policies Issues & Options document. This contained all of the specific sites which had then been formally registered to the Council from the public including agents, landowners, parish councils etc. The sites were published on a 'for information' basis, and without any assessment or endorsement from the Council. As the Site Specific Allocations & Policies document is to conform with the Core Strategy, the document and site

assessments will not be undertaken until the Core Strategy progresses further towards adoption.

#### The Preferred Option Report Dec 2008

5.16 The results of the February 2008 consultation were further considered in the summer of 2008, and incorporated in the Preferred Option 12/08 in December of that year. The evolution of proposals through the above two reports are summarised below.

#### **Housing Distribution East of Ipswich**

5.17 None of the five options considered offered a perfect solution. In particular, all sites would raise problems in relation to the main and local road network (which would need to and could be addressed); all would require the provision of improved health and education provision. The area East of the A12 was chosen as the Preferred Option as offering the best all round solution to meeting the objectives set out above, creating a stand-alone community but well related to a range of employment uses, the primary road network, public transport and other facilities and having the least impact on other individual communities. It was considered that with careful planning and management the identified problems could be managed to an acceptable level.

#### Housing Distribution Felixstowe/Walton and Trimley Villages

- 5.18 Six areas or directions for growth were considered. The numbers of new housing units to be provided was around 1,660 the number required to meet the Going for Growth Scenario 3 from the David Lock Study (which however did not take account of the approval of the Felixstowe Port expansion known as 'Felixstowe South Reconfiguration', and any consequential additional housing requirement).
- 5.19 All of these options however were rejected in favour of a Preferred Option dispersed strategy of "organic and evolutionary growth". This approach recognised the key concerns raised by the public, namely to reduce the impact of one or two single large developments on any single community or the road network; to protect the setting of Felixstowe; to provide a more dispersed pattern of traffic movement; to avoid where possible building on prime agricultural land; to make more use of brownfield sites and to allow for a slower rate of growth linked to new jobs without being so wholly reliant on the port. It was recognised that with this type of approach careful consideration would need to be given to ensure that the necessary new and improved infrastructure requirements could still be achieved and that this would be more difficult than developing on one or two large sites.

#### The Updated Preferred Option Report July 2009

5.20 The results of the consultation on the Preferred Option 12/08 were further considered during the spring of 2009, and some further changes were proposed, specifically in respect of the distribution of the proposed housing numbers across the District. These were first published in the report to Cabinet in July 2009 (Updated Preferred Option 7/09). It is these changes which are the subject of the current consultation. A summary of the issues raised and the Council's responses which have led to the changes are set out in the following section.

# The Council's Response to the Preferred Option 12/08 Consultation And Reasons for the Updated Housing Distribution

- 6.01 Table 1, Appendix 4 Shows the Preferred Option 7/09 numbers, with the Preferred Option 12/08 numbers shown in brackets.
- 6.02 A number of key concerns relating to housing growth were raised in response to the Preferred Options 12/08 document. Comments from the public were broadly directed to the East of Ipswich and Felixstowe/Walton and the Trimley villages areas, as these locations were indicated for the majority of housing growth.
- 6.03 The Council's response to those comments, coupled with the reasoning for the Core Strategy Housing Distribution in its updated form is set out below. A summary of the complete revised housing distribution strategy then follows on page 13.

Comments	Council's Response		
Felixstowe/Walton and Trimley Villages – proposal to reduce the numbers			
1.Too many houses are proposed for the Felixstowe peninsula	The housing allocation for Felixstowe/Walton and the Trimley villages was based on advice coming out of the David Lock Study. This number was designed to address the negative trends which the study highlighted i.e. a declining infrastructure; an ageing population, with trends likely to increase that imbalance; an over-reliance on the Port of Felixstowe jobs; an imbalance between people travelling into Felixstowe for work compared to those commuting out of Felixstowe; a declining tourism offer and the need to invest in the town centre and seafront areas – and all of these coupled with a significant imbalance of housing supply against demand, in particular housing affordable for local first time buyers and lower wage households.		
	<ul> <li>However, while all of these issues remain, it is clear that:</li> <li>A number of the regeneration schemes supported under scenario 3 are progressing without the new housing to support it</li> <li>Suffolk County Council have now decided on a single secondary school option</li> <li>The financial crisis and resulting recession have significantly slowed the rate of expansion of the Port of Felixstowe</li> </ul>		
	A reduction in housing numbers could therefore be considered, particularly during phases 1 and 2, without seriously compromising the overriding objective of securing regeneration.		
2.Too much reliance is placed on the Port of Felixstowe for jobs	It remains the case that the Port of Felixstowe is an important economic driver for both the local and regional economy. The Felixstowe South Reconfiguration works have started but have been phased over a longer period than originally intended. It is important that existing jobs both direct and indirect which are linked with the Port are safeguarded. An increase in the provision of housing in this area will provide the opportunity for those people currently commuting into the area to work to live closer to their jobs. At the same time the Core Strategy includes policies to encourage a wider diversity of jobs locally, but it is accepted that this will take time to happen. A rate of new housing growth more		

	closely linked to new jobs provision is a sensible approach.
3. The A14 is unable to cope now let alone with	The traffic studies which have been done indicate that the A14 even with the additional lorry traffic
increased traffic from the new housing	which will result from the port expansion will be able to cope with the housing numbers proposed.
	Work on improvements to the Dock Spur roundabout and the Copdock interchange to support
	increased HGV traffic, and funded by the Port of Felixstowe, is in the final stages of planning, and is
	expected to start within the next year. Providing housing opportunities for people employed within
	the town to also live there should assist in reducing inward commuting. Reducing the number of
	homes will reduce the impact on the A14. It remains the case however that pursuing a dispersed
	strategy makes it more difficult to project what the impact will be and when it will occur. A clear
	strategy for securing developer contributions will be essential.
4. The emphasis should be on brownfield	This is and remains a fundamental element of both government and local council policy, and the
development in advance of building on new	Council's best estimate for the availability of brownfield land is included in the analysis in Table 1,
greenfield sites.	Appendix 4. However such sites are limited in number and scale in the District, certainly in
	comparison with larger towns with redundant industrial sites. Not all brownfield sites are suitable for
	re-development for residential use, nor is their timing guaranteed. It remains the case that brownfield
	opportunities are limited. The availability and viability of brownfield sites at any point in time will
	therefore be relevant as to whether greenfield sites should be released.
5. The Vision for Felixstowe is wrong. More	It is essential for any area that agreement is reached as to what its Vision for the future is. Whilst
emphasis should be given to the role of tourism	tourism alone will not be sufficient to regenerate the town (David Lock Study) the balance between
and therefore the need to protect its setting.	tourism and other employment opportunities can be re-balanced to reflect this greater level of
	importance. Protecting the setting of Felixstowe will provide an additional criterion when looking at
	where new housing development could take place.
6. Lack of social and community infrastructure to	A thorough investigation into the Felixstowe/Walton and Trimleys area infrastructure requirements
support new housing.	has been undertaken by consultants. The studies have included an appreciation of the existing
	pressures on the area as well as any additional pressures which development may bring. The
	findings have dealt with what infrastructure is required, estimated costs of implementation and
	approximate timescales for delivery. A summary breakdown of the identified infrastructure needs in
	the Felixstowe/Walton and Trimleys area is set out in Appendix 1.
Canalysian	Constraion
Conclusion  An alternative housing distribution which reduces	Conclusion  A strong case can be made for reducing the amount of new housing to be provided within the
An alternative housing distribution which reduces	A strong case can be made for reducing the amount of new housing to be provided within the
the amount of housing to be provided is required	Felixstowe peninsula at least in the short to medium term without compromising the overriding
	strategy which is to regenerate the town and maintain the individual integrity of the various local
	communities. With more emphasis now on the role of tourism additional guidance can be provided as to where development should be broadly directed bearing in mind that it would still be provided
	using a dispersed strategy. A very clear mechanism needs to be found to secure the necessary
	developer contributions to support the identified new and improved infrastructure required to meet
	the needs of the whole Felixstowe/Walton and Trimley area.
	the needs of the whole i elixstowe/walton and infinitely area.

Comments	Council's Response			
Ipswich Policy Area – East of A12 – proposal to increase the numbers				
The numbers of houses currently proposed is too great.	housing figures. It is of sufficient size to provide a relatively self contained community including a measure of health, primary education and a district centre type facility. (To reduce the numbers would mean not meeting RSS requirements as well as resulting in a development which was little more than an overgrown housing estate).			
1,000 is insufficient to provide a stand- alone community	A larger allocation provides the basis for a significantly improved range of community facilities, eventually leading to a 'good sense of place' in the community created. However careful consideration needs to be given to see whether the benefits of additional housing would outweigh the disbenefits for example in relation to traffic impacts. The evidence suggests that the benefits do indeed outweigh the disbenefits.			
Adverse impact on existing communities at Martlesham, Martlesham Heath and Waldringfield  Waldringfield  Output  Description:	One of the reasons for choosing this area east of the A12 is to create a stand alone community, but closely linked to the existing and proposed employment retail and social provision at Martlesham Heath/Adastral Park business centre. The increase in numbers, provided it is the subject of a comprehensive development plan actually creates the opportunity to provide for a more self contained development but which triggers the need for additional infrastructure, particularly secondary education which is of wider benefit to other existing communities. It also offers the opportunity to better mitigate the potential impact of visitors and residents on the neighbouring countryside and estuary through properly managed informal open space provision e.g. for dog walking. Provision of structural landscaping can help with visual intrusion.  The lie of the land in the proposed area, coupled with the fact that much of the land involved either has been or is scheduled to be used for mineral extraction, is such that the degree of the disbenefit from damage to the landscape, loss of agricultural land and the like from the increased size of this allocation is limited, and overall is less than that resulting from other potential locations.			
	Increasing the numbers also offers greater funding opportunities for improving existing and creating new public transport provision which will also be of benefit to these other local communities.			
Unacceptable impact on the neighbouring wildlife and countryside	Development on this scale must be undertaken as part of a comprehensive development which places significant emphasis on mitigating these potential impacts. This could include significant levels of advanced planting; large well managed open areas for dog walkers etc which would help to lessen the impact on the nearby AONB and estuary.			
Unacceptable Impact on the primary and local road network	Development east of the A12 both employment and residential will require improvements to be undertaken to the main and local road networks. However the impact of 2,000 homes as opposed to 1,000 on individual junctions etc when linked to new and improved transport infrastructure is limited but will help to secure the necessary developer funding to secure these upgrades to a good standard.			

6.	The	existing	social	and	community
	infras	structure ca	innot cop	e.	

A thorough investigation into the Ipswich Eastern Fringe infrastructure requirements has been undertaken by consultants. The studies have included an appreciation of the existing pressures on the area as well as any additional pressures which development may bring. The findings have dealt with what infrastructure is required, estimated costs of implementation and approximate timescales for delivery. A summary breakdown of the identified infrastructure needs in the Ipswich Policy Area – East of Ipswich is set out in Appendix 1.

#### Conclusion

## Conclusion Doubling the

Consideration should be given to an alternative housing distribution

Doubling the numbers of new houses at Martlesham provides the impetus/opportunity to create a stand alone community which is of a scale to trigger the need for wider community benefits, particularly a secondary school, and improved public transport provision. It will also increase the amount of developer contribution available to pay for necessary infrastructure. A larger scale development also has the opportunity to provide for a more meaningful set of mitigation measures which can be provided to limit the impact of development on the nearby AONB and nature conservation interests of the estuary. The area has lower negative impacts on landscape quality and public amenity overall than other potential alternatives.

#### **Comments**

### Council's Response

### Small Windfall Provision – reduce provision from this source

National planning policy guidance relating to housing provision places emphasis on the deliverability of new housing. For this reason, housing provision for the first 10 years of a plan must be shown to be deliverable. Small windfall sites by their nature are not sites which can be readily identified and therefore should not be relied upon as part of the main housing provision.

Suffolk Coastal has a long history of small sites coming forward for development. This is largely a product of the nature and amount of small towns and villages which go to make up the district. It is inevitable that these types of sites will decrease in number over time as small scale infilling or replacement of existing homes at a higher density takes place. In response to concerns raised, the Council has decided to reduce the amount of housing it expects to come forward by this route in the earlier years of the Strategy. As is currently the case, the numbers of units being provided in this manner will nonetheless be taken into account when the housing completion figures are updated every year. It will be part of the monitoring process which will be used to identify as and when new greenfield sites need to be released.

#### Reason

### Council's Response

### Market Towns - increase provision from this source

The changes suggested in response to the areas East of Ipswich, Felixstowe/Walton and Trimley villages and the need to reduce the small windfall allowance as noted above mean that to meet the RSS housing requirements some measure of adjustment is required across the rest of the district.

The Strategies for the individual market towns attracted few comments. Those that did respond generally agreed with what was said. In essence the revised housing distribution strategy re-affirms the figures set out in the Preferred Options. It is only in the third phase of development ie years 11 – 16 (2020 – 2025) that it is now suggested that the capacity of the individual towns is re-assessed with a view to providing a further 470 units. For this reason no specific towns are identified although the needs (if any) for Sizewell may influence the strategies of Leiston and Saxmundham.

# 7 The Updated Preferred Option 7/09 Housing Distribution Summary

#### 7.01 Base Requirements

- Total requirement 2008-2025 remains unchanged at 7,710 new homes
- 1,780 homes available as outstanding planning permissions and 540 predicted to occur
  as windfall (the latter reduced by 780 from 1,320 in response to objections that the
  Council should not rely on windfall, it being difficult to quantify)
- Balance of homes needs to be allocated, with previously developed 'brownfield' land given priority
- The release of allocations to be phased over three 5 year periods, 2010-2015, 2015-2020 and 2020-2025
- Allocations are expressed as minimum figures consistent with the approach of the Regional Spatial Strategy The East of England Plan.

#### 7.02 The Overall Strategy

- The two Major Centres continue to be the recipients of a large proportion of the overall housing requirements (52%)
- Proposed housing numbers at Felixstowe/Walton and the Trimley villages to be managed, the scale and pace of development only increasing in order to achieve social and economic objectives for the town
- New housing in the Ipswich Policy Area East of the A12 to be increased in order to create a large development there with an emphasis on it being a community with sufficient supporting infrastructure. The location for such a community remains at Martlesham although the location is specified as to south and east of Adastral Park
- Development at Market Towns be generally restricted to previously developed land although the need for modest 'greenfield' allocations in the final phase is recognised particularly if needed in association with Sizewell
- Allocations at Key Service Centres to meet local needs and affordable housing provision

### 7.03 Ipswich Policy Area – East of the A12

- An allocation of 2,000 new homes be made at Martlesham
- The objectives of such an allocation be clearly set out
- In order to achieve those objectives, integrate the development into the remainder of the Martlesham community, create complementary floorspace (eg retail and leisure), and enable the provision of supporting infrastructure, an Area Action Plan be prepared

#### 7.04 Felixstowe/ Walton and the Trimley villages

- Over the three phases any 'greenfield' allocations will be restricted to land within and immediately abutting the communities of Felixstowe, Trimley St Martin, Trimley St Mary and Walton
- Previously developed 'brownfield' land will account for much of the housing allocations in the first phase with perhaps one modest greenfield allocation
- The second phase will require further, increased allocations in order that new housing can complement the extension of the Port and the success of the regeneration strategy
- Such allocations be concentrated on the area between Walton and Trimley St Mary, creating a 'hub' to include community and commercial facilities as well as some employment in order to diversify the economy. A link road between Candlet Road and the High Road to be an objective
- Some previously developed land may be available in the second period

- The second period will also see an assessment of the success of the strategy in terms of addressing the negative aspects of the town as identified by David Lock Associates, and consideration of the future of Felixstowe beyond 2025
- The third period will see modest 'greenfield' allocations unless such an assessment indicates that an increase in the scale of housing development would be in the long term economic and social interests of the town

#### 7.05 The Market Towns

- The first phase will see the take up of previously-developed 'brownfield' land in all market towns
- One 'greenfield' allocation will be necessary most likely in the form of the carrying forward of an allocation in the current Local Plan of a site at Saxmundham
- The second phase will see allocations of greenfield land at Leiston and Woodbridge as proposed in the Preferred Options
- The third phase will be preceded by an assessment of the needs of each market town to be carried out in a review of the Core Strategy.
- No specific towns can be identified at this stage as the potential recipients of further allocations although the needs of Sizewell, if approved, may influence the strategy for Leiston and Saxmundham

#### 7.06 Key Service Centres

- Settlements will be chosen in consultation with local parish councils having regard to the local need for affordable housing
- There is the possibility of carrying forward an allocation at Rendlesham in the current Local Plan
- The target will be 330 new homes overall of which 1 in 3 will be affordable ones
- Allocations will be made on 'greenfield' land of a scale appropriate to the particular settlement

#### 7.07 Local Service Centres

 Development will occur in the form of infilling<sup>6</sup> and, depending on the nature of the settlement, small groups<sup>7</sup> of homes

Some flexibility to be introduced when defining village envelopes

#### 7.08 Other Villages and the Countryside

 New housing will occur in the form of conversions, agricultural workers' homes or the occasional house for a local need

<sup>.</sup> 

<sup>&</sup>lt;sup>6</sup> Infilling – the filling of a small undeveloped plot in an otherwise built-up frontage. A 'small undeveloped plot' is one which would normally be filled by one or two dwellings. If a plot can accommodate more than this scale of growth, its development will not be infilling. Even where a gap is small, it may be desirable to retain it as an essential feature in the street scene, and there is no automatic assumption that new housing will be approved.

<sup>&</sup>lt;sup>7</sup> 'Group' not more than 5 dwellings related one with another, utilising an existing road frontage, or short cul-de-sac or court.

#### 8 Your Comments

- 8.01 The sections above set out to explain the logic and reasoning behind the suggested revised housing distribution strategy. The Council is seeking your views on this specific strategy before the Core Strategy as a whole is finalised and published as a formal Submission document where the public will be asked to comment on the document "soundness" of production.
- 8.02 This consultation is therefore **very focused.** It is seeking views on the Updated Preferred Option 7/09 **housing distribution** that the Council is now putting forward, and whether or not you think that the reasons behind the changes are:
  - Justified; and
  - Will ensure that the broad strategy that you have already commented, and which has achieved a large measure of agreement, will be better met as a result of these changes.
- 8.03 You can view the document and comment as follows:

#### **On-Line Consultation**

If you have access to the internet, we would encourage you to look at the documents on-line using the following link:

www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/housing

Following previous feedback, the Council has a new and updated online consultation system which we hope you will find much easier and quicker to make your comments. The most efficient way to comment is to use the online consultation system where you will also be able to track your comments and view all other comments already submitted and validated. The consultation system can be accessed via the following link: <a href="http://suffolkcoastal.jdi-consult.net/ldf">http://suffolkcoastal.jdi-consult.net/ldf</a>

You can also email comments or questions to: <a href="mailto:development.policy@suffolkcoastal.gov.uk">development.policy@suffolkcoastal.gov.uk</a> .

#### **Bv Post**

If you are not able to, or choose not to look at the document on line, copies of the document will be available for inspection at the **Planning Help Desk, Council Offices, Melton Hill, Woodbridge IP12 1AU**. Further copies will also be available to view at the libraries within the district. A limited number of paper comment forms will be available at these locations, but can be downloaded and printed off the Council's website if required from the following address:

www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/housing

Letters should be addressed to:

Planning Policy & Development Manager Suffolk Coastal District Council Melton Hill Woodbridge IP12 1AU

Letters may also be received by fax on 01394 385100.

However you choose to respond, all comments must be received by 5pm on 18<sup>th</sup> November 2009.

## APPENDIX 1 – List of LDF evidence base studies

Documents are available for inspection at the Council's reception or upon the Council's website at:

http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/evidence/

#### 2009

#### Ipswich Eastern Fringe Infrastructure Study - September 2009

- The report is an assessment of the strategic, community and infrastructure provision in light of the predicted growth in the Ipswich Eastern Fringe area of 2,000 homes until 2025.

#### Key findings:

Whilst additional infrastructure provision requirements arising from the predicted growth is inevitable and reflects the scale of development proposed, there are no 'show stoppers' and any additional requirement needed should be satisfactorily provided through developer contributions. The options tested have differing levels of needs but all options have some significant infrastructure requirements that could reasonably be expected to be paid for by funding and developer contributions. Further detailed investigation is necessary on viability of development in order to see what is affordable. This point is emphasised in the current economic climate.

Specifically the main expected infrastructure requirements are as follows:

Primary education	For the Options investigated, it is expected that a new primary school of either
Filliary education	210 or 420 places would be required depending upon the scale of development.
	Funding for this is likely to be sourced from both developer contributions and
	through other mechanisms. It is likely that provision would need to be forthcoming
	early in the development phases.
Nursery education	There is likely to be a need for between 1 and 4 new pre-schools dependant upon
	the scale of development. Some expansion at the existing primary schools or
	community facilities may be expected to accommodate the anticipated
	requirement of up to 105 places. Funding would expect to be private or developer
	led.
Secondary	The predicted growth is likely to give rise for up to an additional 420 pupils. The
education	capacity of Kesgrave High School is expected to be exceeded within phase 1 and
	a new high school need of either 210 or 420 places will likely be required
	depending upon the scale of development. Funding is likely to be sourced from
	both developer contributions and through other mechanisms.
Libraries	By the end of phase 3, an extra requirement of between 22-147m <sup>2</sup> of additional
	floorspace will be required. Developer contributions will be sought to provide this
D "	additional requirement.
Police	Increased facilities will be required to deal with anticipated increase in crime
	generated by growth. No specific investments have been indentified in the
	Ipswich Eastern Fringe, but need could include improved communications, more
	staff or more patrol vehicles. Developer contributions will be sought to meet the
Motor	need for increased facilities.
Water	Water Supply. All growth options almost certainly have sufficient capacity to
	supply the required potable water supply.
	Waste Water – Martlesham drains to the Woodbridge Waste water Treatment
	Works. Additional capacity will be required but can be accommodated within the
	existing Anglian Water site. There are potential significant timescales involved
	dependent upon whether the solution is for an expansion of the existing plant or
	the provision of a new one. Forward funding by the developer is likely to be
	required if new housing is to be provided before 2019.
Waste	No pressures on the Household Waste Recycling Centre identified as a result of
	the predicted growth. Developer contributions to be sought towards the
	proportion of costs of a new County-wide residual waste treatment facility and
	new transfer station not covered by PFI.
	,

Gas	Spare capacity exists within the Ipswich Eastern Fringe gas supply network. The Option of 2,000 adjacent to BT may require a small amount of reinforcement work. Costs will be borne solely by the developer.
Health	There is very limited capacity of existing healthcare surgeries. From the growth levels predicted, there is an expected requirement of an additional 2 – 3.3 GPs required to serve predicted populations. These would likely be through expansions to existing facilities other than the Option of 2,000 homes adjacent to BT which would justify a new facility. Funding is likely to be extremely limited other than that from developer contributions.
Fire Service	It is predicted that the additional growth can be covered by the existing set-up.
Electricity	The local electricity distribution network would require a significant reinforcement if anticipated growth takes place in the Martlesham area. A new 33/11kV substation will be required. This is partly down to the expansion of employment operations at Adastral Park as well as predicted housing growth levels. Funding for this is likely to be sourced from both developer contributions and through other mechanisms.
Telecommunications	Existing infrastructure is sufficient to deliver current demand. Telecom services should be rolled out as the new housing and commercial development is built so the issue of priorities does not arise. If issues of priority arise with regard to hispeed internet access prividers should be encouraged to give priority to employment areas.
Allotments	Currently a waiting list for Town/Parish Council run allotments. Additional growth is likely to give rise to the need for the provision of up to an additional 0.84 hectares of allotment space, likely to be solely funded through developer contributions.
Community Halls & Meeting Places	There is no clear or accepted standard of provision, but it is assumed that the predicted growth will result in the need for either one large or two small centres, but it may be preferable to provide such community facilities as part of one large multi-use facility. Funding for such is primarily through developer contributions, although in certain instances funding can be sourced from Sport England if the centre is to provide significant level of sports facilities.
Green Infrastructure	Haven Gateway Green Infrastructure Study have identified a deficiency in natural green spaces. Various projects, including a new County Park, within the vicinity have been highlighted which could address this shortfall. A proportion of costs of green infrastructure requirements can be obtained through developer contributions, although other public funding streams are also available.
Sports Facilities	There is currently a slight oversupply of space at Martlesham in the Ipswich Eastern Fringe. However, it should be noted that little existing facilities are located very close to potential growth locations. Therefore additional space will be required as part of the planned growth for the area. The planned growth will result in a deficiency of up to 7.14 hectares. Funding for this additional provision would be solely through developer contributions.

#### Felixstowe Infrastructure Study - September 2009

- The report is an assessment of the strategic, community and infrastructure provision in light of the predicted growth in the Felixstowe area of 1,000 homes until 2025.

#### Key findings:

Whilst additional infrastructure provision requirements arising from the predicted growth is inevitable and reflects the scale of development proposed, there are no 'show stoppers' and any additional requirement needed should be satisfactorily provided through developer contributions. Specifically the main expected requirements are as follows:

Primary education	Appears to be existing capacity to cover growth in phases 1 and 2, although a
	need for 116 additional places in likely to be required by the end of phase 3. This
	additional need is likely to be met though school extensions and changes to
	existing catchment areas rather than the provision of a new school. Funding is
	likely to be sourced from both developer contributions and through other
	mechanisms.

Nursery education	Some expansion at the existing 5 primary schools which have nursery classes will
	be required to accomodate the anticipated need for 40 places.
Secondary education	The predicted growth is likely to give rise to an additional 214 pupils. It is assumed that the new secondary school, funded through Building Schools for the Future, can accommodate this additional growth.
Libraries	By the end of phase 3, an additional 60m <sup>2</sup> of additional floorspace will be required. There is an issue as to whether this should be provided at the existing library or within community facilities. Developer contributions will be sought to provide this additional requirement.
Police	Increased facilities will be required to deal with anticipated increase in crime generated by growth. No specific investments have been indentified in Felixstowe, but need could include improved communications, more staff or more patrol vehicles. Developer contributions will be sought to meet the need for increased facilities.
Water	Water Supply. No significant requirements have been identified,
	Waste Water – There is a requirement for additional wastewater treatment works in the form of expansion of existing facilities and also for additional sewerage network capacity. There are potential significant timescales involved in securing these improvements. Forward funding by the developer is likely to be required if new housing is to be provided before 2019.
Waste	No pressures on the Household Waste Recycling Centre identified as a result of the predicted growth. Developer contributions to be sought towards the proportion of costs of a new County-wide residual waste treatment facility and new transfer station not covered by PFI.
Gas	Spare capacity exists within Felixstowe's gas supply network.
Health	Assumed that growth will give rise to marginal increase in 999 calls and it should be able to meet these requirements within existing set up, but the pattern of demand will be reviewed regularly.  Regarding acute care, it is assumed that the predicted growth would give rise to the need for an additional 4 beds at Ipswich Hospital, although any change in provision would reflect changes in the catchment area in the whole and not just Felixstowe.
Fire Service	It is predicted that the additional growth can be covered by the existing set-up.
Electricity	Each development will be assessed independently for need. There is currently spare capacity and there will be no requirements for the development of brownfield/urban sites. For Greenfield sites (north of Candlet Road and between Walton and Trimley) some infrastructure development is likely and the costs for such to be solely borne by the developers.
Telecommunications	No significant requirements have been identified
Allotments	Currently a waiting list for Town Council run allotments. Additional growth is likely to give rise to the need for the provision of an additional 0.42 hectares of allotment space, likely to be solely funded through developer contributions.
Community Halls & Meeting Places	There is no clear or accepted standard of provision, but it is assumed that the predicted growth will result in the need for either one large or two small centres, but it may be preferable to provide such community facilities as part of one large multi-use facility. Funding for such is primarily through developer contributions, although in certain instances funding can be sourced from Sport England if the centre is to provide significant level of sports facilities.
Green Infrastructure	Haven Gateway Green Infrastructure Study have identified a deficiency in natural green spaces. Various projects within the vicinity have been highlighted which could address this shortfall. A proportion of costs of green infrastructure requirements can be obtained through developer contributions, although other public funding streams are also available.
Sports Facilities	There is currently a slight oversupply of space within Felixstowe and minimal under supply in both Trimley Villages. Additional space will be required as part of the planned growth for the area. The planned growth will result in a deficiency of 1.9 hectares. Funding for this additional provision would be solely through developer contributions.

#### Suffolk Coastal Retail Study further update - September 2009

- This study builds upon the December 2008 update to look at the potential retail floorspace needs resulting from proposed increased growth in the Ipswich Policy Area - east of the A12 and to take account of the current economic slowdown.

#### Key findings:

The study has assessed changes in the economy, particularly in relation to the forecast levels of growth, and applies new population and phasing assumptions, re-assesses expenditure growth rate assumptions, turnover efficiency and the treatment of Special Forms of Trading i.e. non store activity. Expenditure in the short to medium term is suppressed before increasing to reflect more optimistic assumptions towards the end of the plan period. Although all estimates of future floorspace capacity do change these are considered minor and do not alter the broad conclusions contained within the 2008 retail assessment.

# Suffolk Coastal District Council Local Development Framework Housing Allocations – Proposed Strategy Transport Appraisal – September 2009

- The report considers the potential transport implications and requirements of the proposed housing allocations for the area includinglpswich Policy Area, Felixstowe/Walton and Trimleys villages and the market towns. These areas are considered both independently and cumulatively for transport impact.

#### Key findings:

The study emphasises the importance that all new development should promote sustainable transport choices and that personal travel planning could support more options including public transport, car sharing, active modes for short trips and the potential use for Park and Ride. Some mitigation is likely to be required on part of the strategic road network however the report concludes that all sites are feasible to some degree and no over-riding concerns have been identified. The need for a mechanism to fund delivery of the mitigation measures for the area as a whole is required.

#### Future Secondary School Provision: Alternative Sites Assessment Ipswich Policy Area - June 2009

- Report by Colin Buchanan and Partners that assesses the suitability of three alternative sites for a new secondary school in the Ipswich Policy Area.

#### Suffolk Coastal District Council Land Availability for Housing - April 2009

- List of approved and allocated sites for five or more dwellings as at 1 April 2009.

#### Suffolk Coastal and Waveney District Strategic Flood Risk Assessment (SFRA) - January 2009

- The primary objective of the study prepared by Scott Wilson was to enable the two participating local authorities to undertake sequential testing in line with the Government's flood risk and development policy document - Planning Policy Statement (PPS) 25: Development and Flood Risk - to inform the development of their emerging Local Development Framework (LDF) documents.

#### 2008

#### Suffolk Coastal Retail Study Update - December 2008

- Update of the Retail Study produced by CB Hillier Parker in 2003 (see below). Commissioned by Suffolk Coastal to predominantly investigate how forecasts and the future housing growth may have impacted upon the retail floorspace needs in the district and to extend the quantitative assessment to 2025 in line with the Council's Local Development Framework. This update produced by CB Richard Ellis (previously CB Hillier Parker) should be read in conjunction with 2003 Retail Study.

#### Strategic Housing Market Assessment - November 2008 & June 2009

- Research commissioned by Suffolk Coastal, Babergh and Mid Suffolk district councils and Ipswich Borough Council aimed at estimating housing need and demand in the Ipswich Housing Market Area.

#### Felixstowe Port Logistics Study - October 2008

- Study commissioned to identify the key land use issues and requirements likely to emerge from the expansion of the Port of Felixstowe.

# Suffolk Landscape Character Assessment - September 2008 (Available online only at <a href="http://www.suffolklandscape.org.uk/">http://www.suffolklandscape.org.uk/</a>)

- Jointly produced by all Suffolk local authorities. It is designed to support work to maintain and restore the landscape of Suffolk, particularly through the planning system and to promote and foster wider

understanding of the landscapes of Suffolk. The project has assessed the landscape of the county and identified thirty distinct types of landscape within it.

#### Ipswich Eastern Fringe & Felixstowe/Trimleys Transport Studies - August 2008

- Study by Faber Maunsell jointly commissioned by Suffolk County Council and Suffolk Coastal District Council to examine the broad transport implications of alternative housing developments for the Local Development Framework.

#### Felixstowe Northern Fringe Landscape and Visual Appraisal - July 2008

- Landscape and visual appraisal of land to the north of the A14 to assess suitability for housing growth.

#### Ecological Assessment: Felixstowe & Trimley Villages Strategic Area - July 2008

- Study prepared by the Suffolk Wildlife Trust. Report to conduct an ecological assessment of the potential strategic growth option areas in the Felixstowe, Walton & Trimley villages.

#### **Ecological Assessment: Ipswich Strategic Area - July 2008**

- Study prepared by the Suffolk Wildlife Trust. Report to conduct an ecological assessment of the potential strategic growth option areas in the Ipswich Policy Area.

#### Haven Gateway Water Cycle Study Stage 1 Report - May 2008

- Study looking into water supply, water quality, sewerage and flood risk management issues in relation to growth proposed in the East of England Plan.

#### Haven Gateway Green Infrastructure Strategy - April 2008

- Strategy for delivering a high quality green infrastructure for the Haven Gateway.

#### Suffolk Coastal District Council Land Availability for Housing - April 2008

- List of approved and allocated sites for five or more dwellings as at 1 April 2008.

#### Suffolk Coastal District Council Employment Land Availability Study - April 2008

- Annual study giving details of land committed for industrial and business development as at 1 April 2008.

#### Suffolk Coastal District Council Five Year Housing Land Supply - March 2008

- Study identifying a five year housing land supply as at 31 March 2008.

# Environmental Capacity in the East of England: applying an environmental limits approach to the Haven Gateway - January 2008

- Report prepared for the East of England Regional Assembly and partners by Land Use Consultants to investigate how much development can be accommodated in the area without causing an unacceptable decline in environmental quality

#### 2007

#### Felixstowe Seafront and Town Centre Master Plan report - December 2007

- Report by David Lock Associates commissioned by the Felixstowe & Trimleys Peninsula Future Steering Group.

#### Haven Gateway Framework for Growth - September 2007

- Framework for sustainable growth and programme of development for the Haven Gateway Sub-Region published by the Haven Gateway Partnership.

#### Suffolk Cross-Boundary Gypsy & Traveller Accommodation Assessment - May 2007

- Report jointly commissioned by Mid Suffolk, Babergh, Suffolk Coastal, Waveney and Ipswich local authorities and produced by the University of Salford

# Suffolk Coastal District Council Urban Capacity Study - update to 31 March 2007 (desk top update 2008)

- Report to identify previously development land across the district which has development potential.

### 2006

#### Suffolk Coastal District Employment Study - July 2006

- Study commissioned to inform the development of employment policies for the district.

#### A Local Strategy for Felixstowe Peninsula - April 2006

- Report produced by David Lock Associates setting out a vision to guide regeneration and future development in the Felixstowe area.

#### Suffolk Coastal Local Housing Assessment - February 2006

- Study of housing requirements (including housing need) and an analysis of the condition of dwellings across the district.

### 2005

#### Haven Gateway Partnership Employment Land Study - December 2005

- Review of the supply and demand for employment land and premises across the Haven Gateway sub-region.

#### Haven Gateway Partnership Strategic Residential & Infrastructure Study - November 2005

- Study commissioned by the Haven Gateway Partnership to provide guidance on the strategic direction, scale and phasing of residential development and associated infrastructure requirements for the Haven Gateway sub-region to 2021.

### 2003

#### Suffolk Coastal Retail Study - August 2003

- Study commissioned by Suffolk Coastal District Council to inform and guide retail planning for the district produced by CB Hillier Parker.

### **APPENDIX 2**

LDF CORE STRATEGY - PROGRESS TIMELINE			
KEY CONSULTATION DATES	DATE	SUPPLEMENTARY DOCUMENTS	
	2004		
PLANNING & COMPULSORY PURCHASE ACT 2004 (May 2004)	May		
	2005		
	2006		
Vision & Objectives	March	Supporting Evidence	
vision a objectives	IVIATOTI	(See Appendix 1)	
	2007	(Oce Appendix 1)	
Issues & Options	February	Supporting Evidence	
	2008	(See Appendix 1)	
Further Issues & Options	Feb	Supporting Evidence	
		(See Appendix 1)	
Preferred Options	Dec	Supporting Evidence	
	2009	(See Appendix 1)	
Cabinet	July		
Housing Distribution	Sept	Supporting Evidence	
Cabinet	Dec 2010	(See Appendix 1)	
Full Council	Jan		
Submission to Secretary of State	July	LDF Evidence base documents	
Examination in Public	Nov	Specific Evidnece base papers	
	2011	,	
Inspectors Report	Feb		
Adoption of Core Strategy	March		

TIME LINE/ DATE	PERIOD TO COVER	OPTIONS PUT FORWARD	SUPPORTING/ EVIDENCE BASE DOCUMENTS		
LDF Task Group -		Topic:      Core Strategy & Development Control Policies – Vision	a & Objectives		
- January 2006  March 2006  Consultation on Vision & Objectives	2001 - 2021	Strategic Housing Policy Options to address:  1. How to provide balanced/mixed communities, with no social exclusion  2. Affordable housing needs, based on up to date assessment  3. A definition of affordable housing (including the issue of key sector workers)	<ul> <li>Land Availability – Housing April 2005</li> <li>Suffolk Coastal Local Housing Assessment, Februa 2006</li> <li>Haven Gateway Partnership – Strategic Residentia Infrastructure Study, November 2005</li> <li>Land Availability – Employment, April 2005</li> <li>Haven Gateway partnership – Employment Land Study, December 2005</li> <li>Local Housing Assessment (Housing Needs Study February 2006</li> </ul>		
LDF Task Group - June 2006	-	Topic:      Core Strategy Vision & Objectives – Response to cons     Core Strategy Options	· · · · · · · · · · · · · · · · · · ·		
LDF Task Group - July 2006	-	Topic:			
LDF Task Group - September 2006	-	Topic:      Core Strategy Preferred Options			
LDF Task Group - October 2006	-	Topic:      Core Strategy Preferred Options			
LDF Task Group - November 2006	-	Topic:  Core Strategy Options			
February 2007 Issues & Options consultation	2001 - 2021	Spatial distribution: 6 options – new allocations 3,620 in total  1. Ipswich Fringe only 3,620  2. Ipswich Fringe 900 Fellixstowe/ Trimleys 2,720  3. Ipswich Fringe 1,810 Felixstowe/Trimleys 1,810  4. Ipswich fringe 900 Felixstowe/ Trimleys 2,220 Aldeburgh 0-50 Framlingham 150-300 Leiston 0-150 Total - 500 Saxmundham 150 – 300 Woodbridge 0 – 100	<ul> <li>Land Availability – Housing, April 2006</li> <li>'A local strategy for Felixstowe Peninsula'- David Lock Associates, April 2006</li> <li>Regional Spatial Strategy – East of England Plan Examination in Public report – June 2006</li> <li>Suffolk Coastal District Employment Study, July 2006</li> <li>Land Availability – Employment, April 2006</li> </ul>		

Saxmundham 150 Woodbridge 0 – Key Service Centres 0

900

5. Ipswich fringe

		Felixstowe/ Trimleys 2,120 Aldeburgh 0-50 ) Framlingham 150- 300 ) Leiston 0 – 150 Total - 500 Saxmundham 150 – 300 ) Woodbridge 0 – 100 Key Service Centres 100
		6. Ipswich fringe 1,500 Felixstowe/ Trimleys 2,720 Aldeburgh 0-50 ) Framlingham 150- 300 ) Leiston 0 – 150 Total - 500 Saxmundham 150 – 300 ) Woodbridge 0 – 100 Key Service Centres 100
		General locations: 3 options in respect of how housing could be distributed in the Ipswich Policy Area, Felixstowe/ Trimleys & the market towns:
		One large allocation     A small number of medium sized sites     A variety of different sizes and types
LDF Task Group - June 2007	-	Topic:      Core Strategy Issues & Options – Response to consultation; Vision and general feedback
LDF Task Group - July 2007	-	Topic:      Core Strategy Issues & Options – Settlement Policy     Core Strategy Issues & Options – Employment
LDF Task Group - September 2007	-	Topic:      Development in the countryside     Core Strategy Issues & Options – Housing
LDF Task Group - December 2007	-	Topic:     Preferred Options consultation document     Core Strategy Issues & Options – Outstanding Issues
LDF Task Group - January 2008	-	Topic:      Core Strategy – Strategic Directions for Housing Growth     Core Strategy – Objectives for the towns and vision for the rural area
LDF Task Group - February 2008	-	Topic:  Outstanding Core Strategy issues relating to the settlement policy
February 2008 [Further Issues & Options ] Potential Directions for Strategic Housing Growth	2007 - 2024	<ul> <li>East of Ipswich: sufficient land to accommodate 970 dwellings:         <ul> <li>5 possible broad areas</li> <li>5 possible broad areas</li> </ul> </li> <li>Land Availability – Housing, April 2007         <ul> <li>Five year housing land supply, March 2007</li> <li>Urban Capacity Study, March 2007</li> <li>Haven Gateway – Framework for Growth, September 2007</li> <li>Haven Gateway Ipswich A14 Corridor Study</li> <li>Environmental Capacity in the East of England – Applying an Environmental Limits Approach to</li> </ul> </li> </ul>
		the Haven Gateway, January 2008

LDF Task Group		Regional Spatial Strategy – East of England Plan     Further Proposed Changes – October 2007     Land Availability – Employment, April 2007  Topic:
- June 2008	-	Core Strategy – Development Control Policies
LDF Task Group - July 2008	-	Topic:      Core Strategy – Proposed location of strategic housing growth in the area East of Ipswich
LDF Task Group - August 2008	-	Topic:      Core Strategy – Proposed location of strategic housing growth in the Felixstowe & Trimley villages
LDF Task Group - October 2008	-	Topic:      Local Development Framework – Draft Core Strategy & Development Control Policies     Site Specific Policies & Allocations – Issues & Options
December 2008 Preferred Options consultation	2008 - 2025	Preferred option:  East of Ipswich Felixstowe/ Trimleys Aldeburgh OFramlingham Leiston Saxmundham Woodbridge Total:  Preferred Service Centres Total:  Preferred option:  East of Ipswich 1,050 Felixstowe/ Trimleys 1,660 Sustainability Appraisal of Core Strategy, Development Control Policies and Strategic Housing sites at Preferred Options Stage, October 2008  Ipswich Eastern Fringe & Felixstowe/ Trimleys Transport Studies, August 2008 Felixstowe Port Logistics Study, October 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Land Availability – Employment, April 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Land Availability – Employment, April 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report, July 2008 Felixstowe Port Logistics Study - Stage One report Studies at Preferred Options Stage, Ctober 2008 Felixstowe Port Logistics Study - Stage One report Studies at Preferred Options Stage, Ctober 2008 Felixstowe Port Logistics Attages of Core Strategy - Stage - Stage - Stage - Stage - Stage - Stage -
February 2009	2008 – 2025	Proposed Strategy Minimum new allocations: Ipswich Policy Area 2,000 Felixstowe/ Trimleys 1,000 Market Towns 870 Key & Local Service Centres 210 Total: 4,080  Land Availability – Housing, April 2009 Suffolk Coastal Retail Study, December 2008 Suffolk Coastal & Waveney District Strategic flood Risk Assessment (SFRA), January 20009
LDF Task Group - June 2009	-	Topic:      Core Strategy – Housing & Settlement Policy
LDF Task Group - June 2009	-	Topic:
Cabinet - July 2009	-	<ul> <li>Topic:         <ul> <li>Local Development Framework Task Group Minutes – meetings held on 16<sup>th</sup> and 22<sup>nd</sup> June 2009</li> <li>Forward Plan – Local Development Framework Core Strategy</li> </ul> </li> </ul>

<u>APPENDIX 4</u>
<u>Table 1</u> - Breakdown of Updated Distribution Strategy 07/09

The original distribution strategy 12/08 figures are shown in brackets

Figures are rounded.

From: 2008 - 2025	Outstanding planning permissions	Urban Potential (large brownfield)	Outstanding housing allocations from previous local plan	Small windfall (small brownfield)	Minimum new allocations (greenfield)	% of new dwellings total	TOTAL
Ipswich Policy Area	420	220	0	Included in total below	2,000	34	2,640 155 p.a.)
	(420)	(180)	(0)		(1,050)	(21)	(1,650)
Felixstowe Walton & the Trimleys	160	250	0	Included in total below	1,000	18	1,410 (80 p.a.)
	(160)	(250)	(0)		(1,660)	(27)	(2,080)
Market Towns	670	400	150	Included in total below	870	27	2,090 (120 p.a.)
	(670)	(410)	(150)		(400)	(21)	(1,630)
Key & Local Service Centres	530	170	120	Included in total below	210	13	1,030 (60 p.a.)
	(530)	(180)	(120)		(200)	(13)	(1,030)
District wide ('Windfall')				540		7	540 (30 p.a.)
				(1,320)		(17)	(1,320)
TOTAL	1,780	1,040	270	540	4,080	100%	7,710 (450 p.a.)
	(1,780)	(1,030)	(270)	(1,320)	(3,310)	(100%)	(7,710)

<u>APPENDIX 4</u>
<u>Table 2</u> - Housing Provision 2008 – 2025 From All Planned Sources

# Comparison of Preferred Option 12/08 and Updated Preferred Option 7/09 as Percentage of Existing and Proposed Housing Stock Numbers of dwellings (housing stock) in Suffolk Coastal, existing and proposed

	Existing Housing Stock March 2008			Prefe	rred Optic	on 12/08			Updated	d Preferre	d Option 7/09	)
			New Housing  Totals 2025 (existing stock +new housing)		New Housing			Totals 2025 (existing stock + new housing)				
	Units	%	Units	% of new housing	Per annum	Units	%of total housing stock	Units	% of new housing	Per annum	Units	% of total housing stock
Ipswich Policy Area	11,248	20%	1,650	21%	100	12,898	20%	2640	34%	155	13,888	21%
Felixstowe Walton & the Trimleys	13,718	24%	2,080	27%	120	15,798	24%	1410	18%	80	15,128	23%
Market Towns	11,514	20%	1,630	21%	95	13,144	20%	2090	27%	120	13,604	21%
Key & Local Service Centres	17,590	31%	1,030	13%	60	18,620	29%	1030	13%	60	18,620	29%
Other villages and countryside	3,135	5%	0	0%	0	3,135	5%	0	0%	0	3,135	5%
Windfall (unidentifiable small sites)	-		1,320	17%	75	1,320	2%	540	7%	30	540	1%
District Total	57,205	(100%)	7,710	100%	450	64,915	100%	7,710	100%	450	64,915	100%

Note 7,710 new dwellings represent an increase of 13.5% (rounded) over the 2008 dwelling stock.

Note Percentages may not add up to 100% due to rounding.

# APPENDIX 5 TABLE 1 - REVISED SETTLEMENT HIERARCHY

(Changes. Some settlements have changed levels and are indicated in bold. +/- indicates if they have gone up or down. # shows new settlement.)

Settlement Type	Scale and level of existing facilities	Settlements				
Major Centre	Sub-regional centre for commercial and social facilities	Felixstowe  Ipswich Fringe i.e. Kesgrave, Martlesham Heath, Purdis Farm; Rushmere St Andrew (excluding village)				
Town	Focus point for employment, shopping and community facilities. A transport hub	Aldeburgh Framlingham Leiston Saxmundham Woodbridge (with parts of Melton & Martlesham)				
* settlement considered capable of accommodating more strategic levels of growth	Settlements which provide an extensive range of specified facilities, namely most or all of the following:  • Public transport access to town • Shop)s) meeting everyday needs • Local employment opportunities • Meeting place • Post office • Pub or licensed premises • Primary school • Doctors surgery  Settlements providing a smaller range of facilities	Alderton Blythburgh Bramfield Dennington Earl Soham Eyke Grundisburgh Hollesley Knodishall Martlesham (village) Melton (village) Orford Otley Peasenhall (with part of Sibton) Aldringham	Rendlesham Snape Trimley St Martin* Trimely St Mary* Westleton Wickham Market Witnesham Yoxford	Rushemere St Andrew (village)		
Local Service Centre	than Key Service Centres. At least 3 from:  Public transport access to town Shop)s) meeting everyday needs Local employment opportunities Meeting place Post office Pub or licensed premises	Badingham Bawdsey Bucklesham Benhall Blaxhall Brandeston Bredfield Bruisyard (+) Butley Campsea Ashe Charsfield Chillesford Darsham	Easton Hacheston Hasketon Kelsale Kirton (-) Little Bealings Little Glemham Marlesford Middleton Nacton Parham Rendham	Shottisham Stratford St Andrew Sutton Heath Swilland Theberton Thorpeness Tunstall Ufford (-) Walsberswick Waldringfield Wenhaston Westerfield		

Other Village	Settlements with few or minimal facilities	Boyton Bromeswell Chediston Clopton (-) Cransford Cratfield Cretingham Falkenham Farnham Foxhall Friston (-) Great Bealings (-) Great Glemham	Heveningham Huntingfield Kettleburgh (-) Levington Melton Park (#) Newbourne Pettistree Playford Saxtead Sudbourne Sutton (-) Sweffling	Tuddenham Walpole
Countryside	The area outside the settlements above, including the hamlets and small groups of dwellings that are dispersed across the district	Boulge Brightwell Burgh Capel St Andrew Cookley Culpho Dallinghoo Debach	Gedgrave Hemley Hoo Iken Letheringham Linstead Magna Linstead Parva Monewden	Ramsholt Sibton Sizewell Sternfield Stratton Hall Swilland Thorington Ubbeston Wantisden

## APPENDIX 5

## <u>Table 2 -</u> Revised Settlement Hierarchy – Scales of Development

Housing	Employment	Retail
Major Centre		
Sub-regional centre for strategic housing and employment provision	on, and commercial and social facilities.	
Town		
Focal point for estate-scale housing, employment, shopping and c	rommunity facilities A Transport hub	
1 ocal point for estate-scale flousing, employment, shopping and c	onimumity facilities. A Transport hub.	
Key Service Centre		
Allocations in the form of:	General employment in larger settlements.	Small range of comparison and convenience shopping.
(a) Minor extensions to some villages to meet local needs		
Within the defined village envelope development in the form of	Emphasis on local employment in the smaller ones.	Emphasis on retention of existing provision.
Within the defined village envelope development in the form of (i) Modest estate-scale development where consistent with	Emphasis on retention of existing businesses and areas in	
scale and character	employment use to provide opportunities for expansion and	
(ii) Groups	start-up	
(iii) Infill	Start up	
(		
Affordable housing provision		
(a) 1 in 3 units in all developments creating 3 or more new		
units		
(b) 100% on exception sites on the edges of village enveloped		
Local Service Centre		
Within the defined village envelope as appropriate in the form of	Emphasis on local employment	Convenience shopping mainly. This could include
(i) Groups and/or		provision in the form of a farm shop or similar
(ii) Infill	Where provision exists emphasis will be on retention.	linked/ancillary to another use
Affordable begging provision	Potential for expansion likely to be limited due to environmental and infrastructure limitations.	Emphasis will be on retention of existing provision
Affordable housing provision (a) 1 in 3 units in all housing developments providing 3 or	environmental and infrastructure limitations.	Emphasis will be on retention of existing provision
more new units	New provision most likely to be provided through	
(b) 100% on exception sites on the edges of the village	conversion/re-use of existing buildings and have tangible	
envelope	links to the local area.	
Other Village		
No village envelope and very limited development.	Existing employment where it exists is linked predominantly	Where provision currently exists this situation is unlikely to
	to agricultural industry or other rural business	change.
Infill housing to meet agreed and evidenced local need and		
where there is an aspiration in a parish plan to become a more	Emphasis will be on retaining existing uses	Farm shops or similar.
sustainable settlement		
Countryoida	Farm diversification and tourism uses may be appropriate	
Countryside  No development other that in exceptional circumstances.	Employment where it does exist is predominantly linked to	Where no provision currently exists this situation is unlikely
no development other that in exceptional circumstances.	agriculture or forestry.	to change.
Infilling in clusters well related to sustainable settlements	agriculture or lorestry.	to change.
miniming in clusters well related to sustainable settlements	Farm diversification schemes and tourism uses may be	Farm shop or similar
	appropriate.	- Carristop of official
L	I abbushings.	I

SUFFOLK COASTAL DISTRICT COUNCIL

# HOUSING DISTRIBUTION - UPDATED PREFERRED OPTION 07/09 COMMENT FORM

#### Please note the following before completing this form: -

- You are recommended to use this form as it will enable us to deal with your comments accurately and efficiently.
- Please complete all sections fully and clearly in pen.
- Please use one form per comment/objection. You may obtain more forms via the Council's Offices or you can print off additional copies from the Council's website site at:

  www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/housing
  or alternatively, your comments can be submitted efficiently online via the Council's new online consultation system at: <a href="http://suffolkcoastal.jdi-consult.net/ldf/">http://suffolkcoastal.jdi-consult.net/ldf/</a>
- Comments cannot be treated confidentially and will be made public.

NAME & ADDRESS:	Telephone:
	Email:
AGENT'S DETAILS (if applicable):	Telephone/Fax:
	Email:
Which document and sections are you	commenting upon? (please tick)
Updated Preferred Option 07/09  Section:	Sustainability Appropriate Appraisal Assessment  Paragraph:
Are your responses supporting, objection	ng or generally commenting? (please tick)
Supporting	Objecting General comments
indicate concisely whether you feel the considered to better meet the broad stracommenting upon the Sustainability Ap	ed Preferred Option 07/09 document, then please proposed changes are a) justified and b) are ategy for development in the district. If you are opraisal or Appropriate Assessment documents, your support / objection or other comments necessary)

If you are objecting to a	ny area of the documents, please indicate what changes you	
would like made (please	continue on a separate sheet if necessary)	
SIGNED:	DATED:	

Thank you for your comments.

Please return this form by post or email to:

LDF Updated Preferred Options 07/09,
Planning Services,
Suffolk Coastal District Council,
Council Offices,
Melton Hill,
Woodbridge,
Suffolk, IP12 1AU

development.policy@suffolkcoastal.gov.uk



COMMENTS MUST BE SUBMITTED NO LATER THAN 5pm Wednesday 18<sup>th</sup> November 2009



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