

# **Examination of Suffolk Coastal Plans – Site Allocations and Area Specific Policies Document and Felixstowe Peninsula Area Action Plan**

## **Inspector's Matters, Issues and Questions**

### Introduction

1. In answering these questions the Council should consider whether it might be necessary to advance any potential main modifications to the submitted plans.

### **Cross-cutting issues**

#### **Issue 1 – legal compliance**

2. Have the plans been prepared in accordance with the Local Development Scheme (LDS), including in terms of timing and content? Does the LDS make clear the relationship of the 2 plans and the adopted Core Strategy (CS)? If not, is it made clear in the plans?

3. Has consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations? Comment on representations made on late changes made to the plans and lack of consultation on them.

4. Has regard been had to any Sustainable Community Strategy? In which way?

5. Have the plans been subject to Sustainability Appraisal (SA)? Does the SA comply with the relevant Regulations? Is it clear how SA has influenced the plans? Have all reasonable alternatives been considered in respect of policies and sites?

6. Has a Habitats Regulations screening been carried out for the plans? What were the main findings?

7. Have the plans been prepared in accordance with the relevant Act and Regulations?

8. Has the duty to cooperate (under s 20(5)(c) and 33A) been met? On what strategic issues has co-operation taken place? How was co-operation carried out and with what results? Has this been documented? Are there any outstanding issues?

9. Are the plans and their policies consistent with national policy? Are there any significant departures from national policy? If so, have they been justified?

10. Are the plans consistent with the CS?

## **Issue 2 – Coverage and approach**

11. The National Planning Policy Framework (NPPF) states that LPAs should produce a Local Plan and that any additional development plan documents should only be prepared where there is justification. What is the justification in this case for the preparation of two separate plans?

12. The CS also includes a commitment to an Action Area Plan for Martlesham, Newbourne and Waldringfield. Has that now been abandoned and where is that documented? How are policies for that area to be delivered?

13. The Plans cover the period to 2027, in accordance with the CS timespan. Assuming the plans were to be adopted in early 2017, that would leave them only a 10-year lifespan. The NPPF prefers a 15-year plan period and the Planning Policy Guidance (PPG) says that such plans can pass the test of soundness where LPAs have not been able to identify sites or broad locations for growth in years 11-15. What is the justification for having plans of less than 15 years life? Should there be a commitment in the plans to an early review? If so, is there a need for a modification with the timescale for any review be set out?

14. Can it be confirmed that there would be no saved policies remaining from the 2001 Local Plan once these plans have been adopted?

15. Is it clear from the plans what supplementary planning guidance (SPG) would be prepared? Would any SPG cover policies or matters where difficult decisions ought to be made in the development plan?

16. Are all the necessary topics covered by the policies in the plans? Are there any omissions?

17. How will provision be made for gypsies, travellers and travelling showpeople? The CS said there would be a single issue Site Allocation Plan for this provision, which is now being left to the Local Plan Review. Is there any urgent need for this provision? How/when will the necessary pitches be delivered?

18. Are all matters relating to minerals and waste planning dealt with in plans prepared by the County Council?

19. Will the monitoring indicators allow the plans to be effectively monitored, including all important assets? Are there any updates on the delivery framework?

### **Issue 3 – Cross-cutting issues - housing**

19a. Would the site allocations plan and the AAP make an appropriate contribution to meeting the housing requirement of 'at least 7,900 dwellings over the period 2010-2027' in accordance with the CS?

20. Give further details on how the housing numbers in Table 2 in each plan have been derived. Are these figures actuals or minima, in terms of sites larger than 5 units, or are only windfalls additional to these figures in the plans?

21. What has been the Council's approach to calculating windfalls?

22. Explain in more detail the Council's "contingency approach" to meeting the Core Strategy housing figures.

23. How does the spatial distribution of sites within the plans match the spatial strategy set out in the CS and the settlement hierarchy? If there is any difference what is the justification?

24. Have there been any recent planning permissions which would materially affect the supply or spatial distribution of housing?

25. Has a robust assessment been carried out in respect of the spatial distribution of the sites to assess the need for infrastructure, including greenspace, to meet the needs of the occupiers of the new homes? How has the potential impact on viability and deliverability been taken into account?

26. How has the potential yield for each site been calculated? What densities were assumed and has this been guided by any policies in the plans?

27. The PPG states that housing provided for older people including in residential care homes in Use Class C2 should count against the housing requirement. Has such housing been included in the supply totals? If not, should it be and are any modifications required?

28. How firm is the deliverability of sites (excluding Aadastral Park, see below) included in the plans which form part of the Council's 5 year supply? Is the housing trajectory realistic, based on past trends?

29. What is the evidence that there would be a 5-year rolling supply throughout the period of the plans? If a 20% buffer were to be used instead of 5% how would affect the 5-year supply?

30. Aadastral Park – give further details and an update on the proposed planning application and the phasing and deliverability of the site's development in the plan period. Why has a planning application rather than an allocation been chosen for bringing the site forward?

31. What will be the procedures for housing delivery through neighbourhood plans and what contingencies will be made for any non-delivery?

32. What is the current situation on the size of dwellings in the housing supply and how does it compare to Table 3.6 of the CS? Is there any shortfall that needs to be addressed?

33. Affordable housing - The Council's policy in the CS does not comply with the Written Ministerial Statement of 28 November 2014. Although the review of the policy will be for the Local Plan Review, does the Council consider that a modification should be made to the plans to show the number of affordable houses that would be expected to be provided on each of the allocated sites?

**33a. Affordable housing. Explain how the exact mix of units on each site will be informed by appropriate Local housing Needs Surveys.**

34. How do the plans cater for the needs of different groups in the community, including families with children, single people, older people, people with disabilities and those wishing to build their own homes?

35. Has the housing site selection process been soundly based and based on SA with the testing of alternatives? Are the reasons for selecting the preferred sites clear from the SA and also where professional judgement has been used in the selection process? Has the site selection process been transparent and the methodology sound? Why is there a minor negative impact on SA Objective 17 (the conservation and enhancement of biodiversity and geodiversity)?

#### **Issue 4 – Cross-cutting issues - Employment**

36. Is there an up-to-date assessment of the total amount and different types of employment land needed? How do the allocations relate to the spatial strategy of the CS and policies SP5- SP7? Are there any significant departures?

37. Is it clear how the allocations were selected? Was it in terms of the settlement hierarchy or on the individual merits of sites? How has sustainable travel in terms of journeys to work been taken into account?

### **Issue 5 – Cross-cutting issues – physical limit boundaries**

38. How have the physical boundaries been drawn up? Has a consistent approach been followed?

39. How is it intended that policies SSP2 and FPP2 should operate? Will all development proposals be acceptable in principle within the boundaries, subject to policies in other documents? Should there be further clarity on the types of development that would be allowed outside physical limit boundaries?

### **Issue 6 - Cross-cutting issues – areas to be protected from development**

40. Set out the methodology and reasons for allocating the areas protected by policies SSP39 and FPP28.

41. What is the relationship between these areas and those protected either by allocations or other policies eg. historic environment, landscape, townscape or countryside? How far is the continuance of this older development plan policy (AP28) justified?

### **Issue 7- Cross-cutting issues – retail**

42. How much additional comparison and convenience floorspace is required and where? Is this consistent with the CS? How will the District centres, which are seen as the most vulnerable in the Carter Jonas survey, be protected?

### **Site Allocations and Area Specific Policies document**

#### **Issue 7 - Consultation**

43. How have the views of local Parish Councils, including Kelsale-cum-Carlton and Aldringham, been taken into account on changes in the numbers of houses allocated and to physical limit boundaries in their local settlements?

## **Issue 8 - Sustainability appraisal**

44. How have the impacts on AONB and designated landscapes been taken into account in the allocation of the sites?

## **Issue 9 - Specific sites and policies**

45. SSP3 – How are the issues with the road junction to be addressed? How does this affect the deliverability of the site?

46. SSP4 – Explain in further detail how the SA was applied in the earlier stages of the plan, when it was excluded, and then later on when it was included and subsequently increased to 40 units from 20 units.

47. SSP5 – Although this is only a small site, has the best possible yield in terms of numbers of units been achieved?

48. SSP6 - Para 2.57 indicates that the site might not become developable until after 2020, due to lack of school places. Similar comments are made at para 2.79 in respect of site SSP10 and at para 2.113 in respect of site SSP14. Is the Council confident these sites can be delivered in the plan period?

48. SSP12 - Has the best possible yield in terms of numbers of units been achieved and is the site deliverable, given its constraints? Have the cumulative traffic impacts of this site, SSP13 and the employment area at SSP24 been taken into account?

49. SSP14 - has the best possible yield in terms of numbers of units been achieved on this site or can the known constraints be overcome?

50. SSP17, 18 and 19 – Give further details on how the infrastructure requirements for these sites, which are likely to be provided in Ipswich BC area, would be provided.

51. Given the importance of the Sizewell, should this be mentioned in the introduction to the section on the economy?

52. Explain how the employment policies are consistent with national policy and the CS? Is adequate provision made for smaller-scale employment?

52. SSP24 - Are the Council content that uses can be controlled on the site through planning permission C/10/3239?

53. Explain how the retail policies are consistent with national policy and the CS.

53. Explain how the tourism policies are consistent with national policy and the CS. Do the policies allow for small-scale and more niche developments?

54. Explain how the recreation and green infrastructure policies are consistent with national policy and the CS?

55. Explain how the environment policies are consistent with national policy and the CS?

56. Give further information as to how the plan provides a positive strategy for the conservation and enjoyment of the historic environment.

57. How will the Recreational Avoidance and Mitigation Strategy, to be adopted in 2017, link to the policies or development proposed in this plan or the CS? What will be its status and how will it be implemented?

58. SSP40 – Explain the special spatial characteristics of this area and why is it worth conserving.

59. What is the timeline for the Coastal Change SPG?

60. Implementation and monitoring – what confidence is there that the site listed on p133 will be implemented at the size and timescale set out in the table?

#### Omission sites

61. **Briefly** comment on the sites below and their suitability or otherwise for inclusion in the plan:

- Site 982. Does the site now have planning permission?
- site for c300 dwellings, E. of Bell Lane
- Hut Field - Rendlesham

#### **Felixstowe Peninsula Action Area Plan**

##### **Issue 10 - Consultation**

62. Comment on the various representation marks made about consultation on the plan

##### **Issue 11 - Sustainability appraisal**

63. How have the impacts on AONB and designated landscapes been taken into account in the allocation of the sites?

64. How have the impacts on air quality been taken into account in the allocation of the sites?

### **Issue 12 - Specific sites/policies**

65. How will provision be made for infrastructure arising from the needs of the new occupiers of the dwellings on the Felixstowe peninsula in terms of education? Which sites would be affected if funding were not available to provide sufficient primary school places and how would this affect the implementation of the plan?.

66. How does the allocation provide a mix of accommodation in Felixstowe, compatible with its role as a resort and tourist destination?

67. Explain how the housing policies are consistent with national policy and the CS.

68. FPP3 and FPP4. How will the Rifle Club be retained/ relocated and what steps have been made to find an alternative site/ premises? How does this issue and the constraints in relation to heritage assets adjacent to the site affect the implementation of development on the site in the plan period?

69. FPP5. Comment on the constraints on this site and their impact on its viability.

70. FPP6. Is the policy wording consistent with those for other housing allocation sites in its requirements for the development of the site?

71. FPP7. What constraints exist for the development of this site and how will infrastructure be provided for it?

72. FPP8. Does the planning permission granted on 29 June 2016 fully cover the allocation on this site?

73. Explain how the employment policies are consistent with national policy and the CS. Is adequate provision made for smaller-scale employment uses?

74. Explain how the retail policies are consistent with national policy and the CS.



75. Explain how the tourism policies are consistent with national policy and the CS. Do the policies allow for the regeneration of Felixstowe as a resort and visitor destination, with a range of accommodation? Indicate how the policies for individual areas (policies FPP17-FPP21) combine in enhancing the town as a whole, in terms of tourism.

76. Explain how the environment policies and those for recreation and green infrastructure are consistent with national policy and the CS. Explain the approach taken to the protection of the historic environment in the light of the policies of the NPPF, in particular the treatment of Felixstowe South Conservation Area.

#### Omission sites

77. **Briefly** comment on the sites below and their suitability or otherwise for inclusion in the plan:

- Sites at High Road Trimley St Martin (Nos 3022a and 3022b)
- Option site 383b
- Candlet Road site
- **Great Street Farm, Trimley St Mary**

#### **Other matters**

78. A number of minor changes have been suggested by the Council in response to representations received to the submitted plans. Have these changes now been agreed by the relevant representors?

Elizabeth Hill

8 August 2016