SCDC’s Response to Inspector’s Matters and Issues

Main issue – Whether the spatial strategy is soundly based and justified, presenting a clear spatial vision for the District in accordance with national and regional policies

Introduction

1.1 The main overarching goal of national, regional and local planning policy is to create sustainable development. The Framework (F1-6) sets out the national policy approach to guide sustainable development planning. It states (paragraph 8) “…to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system…”

1.2 In the case of the regional planning policies, the East of England Plan (EoEP) (C7a-1) policies seek to put in place “…a framework that promotes sustainable development, especially to address housing shortages, support the continued growth of the economy and enable all areas to share in prosperity, whilst driving up energy efficiency and carbon performance, improving water efficiency and recycling an increasing percentage of waste…” [paragraph 1.11].

1.3 The Core Strategy (CS) is the document which forms the basis for the Council’s long term planning framework. The document will help to guide future land use development, but will also influence other relevant plans and strategies, their priorities and investment in the district.

1.4 The CS contains a number of strategic policies (SP1 – SP18) which have been developed and tested over several years and which set out the general approach to be taken for key issues (social, economic and environmental) across the district. The strategic policies are supported by the development management policies (DM1 – DM33) which set out the Council’s more detailed criteria to enable developments to meet the CS vision, objectives and strategic policies.

1.5 Following the CS, the Council will produce further local plans in the form of the Site Specific Allocations & Policies document, and the Area Action Plans which will focus on allocating appropriate land to deliver the Core Strategy goals.
Issues

a) Does the CS contain an appropriate spatial vision and objectives for the District?

1.6 Yes. The Council’s vision is contained within paragraph 3.04 in Section 3 of the CS document. The remainder of Section 3 sets out the Council’s 15 spatial objectives and the ‘Policy Overview’ in the Preface demonstrates the relationship of each objective to the policies contained in the document.

1.7 The CS has been produced in general conformity with the objectives and policies in the East of England Plan (EoEP) (C7a-1). The document does not seek to repeat national and regional policy – merely to expand upon this where local circumstances and context are relevant. The Council has followed the changing national planning framework and is confident that the CS (and proposed modifications) generally conforms with the Framework.

1.8 The CS objectives have been drawn up consistently and, where possible, shared with the Sustainable Community Strategy (as explained in Section 1 of the CS). This ensures they are compatible and helps with meeting the wider goals of the local community. The issues have been identified through ongoing monitoring and some of the early consultation rounds for the Core Strategy document. Generally the vision and objectives seek to build upon the qualities and successes of the district, continuing to enhance social and economic growth, whilst respecting and maintaining the intrinsic quality of the local environment which make it special.

1.9 Each CS objective is supported by a summary outcome commentary which explains how the objective is to be met in the local context. Each policy also has similar supporting text which sets out the context / justification.

b) Do the policies in the CS reflect the identified spatial vision and objectives for the District?

1.10 Yes. The policies and objectives have been checked for consistency with national and regional planning approaches and have also been tested and refined in the Sustainability Appraisal process. Where there is no local context for a national or regional policy, local planning authorities are instructed not to repeat policy.

1.11 The CS policies have been derived from the vision and objectives and are presented in a logical structure in the document to reflect the corresponding spatial relationships. The ‘Policy Overview’ in the CS Preface also demonstrates the relationship of each objective to the policies contained in the document. The Council maintains that the policies presented in the CS, and the proposed modifications, are appropriate to implement the stated vision and objectives.

1.12 The CS clearly sets out a monitoring framework (Chapter 6, Table 6.1) including specific targets in order to ensure that the policies meet the
objectives. Where policies are identified as not performing well to meet the targets and objectives, the Council will take action to review policies accordingly.

c) **Does the CS reflect the presumption in favour of sustainable development in national policy?**

1.13 Yes. The Council previously considered this matter under the Inspector’s consultation regarding the Framework in May 2012. It is the Council’s view that with the inclusion of the model policy’ (MM4) in the CS, the document is consistent with the presumption in favour of sustainable development, as set out in national policy.

1.14 Paragraph 119 of the Framework is noted. It states “The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.” The Council has appropriate environmental recognition / protection of these issues built into the CS, in particular within policy DM27, which is supported by a number of key local environmental groups (see *Statement of Common Ground 2* and MM59). In addition, a Habitats Regulation Assessment (D2b-5) has been produced for the CS.

d) **Have reasonable alternatives to the overall spatial strategy and the District–wide distribution been considered?**

1.15 Yes. A summary of this is provided in the Sustainability Appraisal accompanying the Plan (Appendix 6 pages 130-133, 141-142) (D2a-13 and G1-9). The Council identified a number of spatial planning options in the context of the emerging EoEP policies and the requirement to be in general conformity with these.

1.16 For housing, this amounted to 3 considered options for the housing numbers required, 3 options for the distribution of housing district-wide and 5 broad areas for growth in each of the Eastern Ipswich and Felixstowe areas.

1.17 The 3 housing requirement options subjected to sustainability appraisal were:

   i.) **(Preferred option)** A housing level as set out in the EoEP (10,200 dwellings, with a minimum 3,200 being in the Ipswich Policy Area)

   ii.) An increase in the Ipswich Policy Area housing numbers above the EoEP target and a subsequent reduction in the figure for the rest of the district.

   iii.) An increase in the reliance upon ‘windfall’ sites and a subsequent reduction in the need for new housing allocations to be made.

1.18 The 3 housing distribution options subjected to sustainability appraisal were:

   i.) **(Preferred option)** To prioritise development in the [more sustainable] larger settlements (eg Eastern Ipswich and Felixstowe) but also facilitate appropriate rural development in the district’s market towns and many villages
ii.) To prioritise development in the larger settlements and market towns, but ignore the districts villages for potential new housing allocations.

iii.) To provide new housing allocations equally between the Eastern Ipswich Plan Area and Felixstowe area only.

1.19 For employment, EoEP policy E1 (C7a-1) indicated that the Suffolk Haven Gateway area (Ipswich / Suffolk Coastal / Babergh authorities) should plan for an indicative jobs growth target of 30,000. As the Haven Gateway Employment Land Study (pages 31-32) (C2a-3), demonstrates, this equates to a need in Suffolk Coastal for around 8.5ha of new employment land. EoEP policy E3 (C7a-1) also required the identification of strategic employment sites to deliver the expected jobs targets and the Council considered options for this.

1.20 The 2 approaches to strategic employment sites subjected to sustainability appraisal were:

i.) (Preferred option) new strategic sites at Adastral park, Felixstowe port and Ransomes Europark.

ii.) new strategic sites at Adastral park, Felixstowe port only

1.21 The 2 approaches to rural economic growth subjected to sustainability appraisal were:

i.) (Preferred option) a positive approach to allowing appropriate economic growth in rural areas

ii.) strict control of rural economic growth, presuming against development

e) Is there a clear audit trail showing how and why the preferred overall spatial strategy and District-wide distribution of development were arrived at?

1.22 Yes. A summary of this is provided in the Sustainability Appraisal accompanying the Plan (Appendix 6 pages 130-133, 141-142) (D2a-13 and G1-9) and a consultation timeline was also set out for the public in the CS Updated Preferred Option document (pages 23-25) (D1-3). The Council identified a number of spatial planning options in the context of the emerging EoEP policies and the requirement to be in general conformity with these.

1.23 The preferred approach to housing numbers required was to match the figure (10,200 in total - 510 per annum) set out in policy H1 of the emerging EoEP document. The distribution of the housing was considered to be best served by an approach which prioritised development in the larger settlements (eg Eastern Ipswich and Felixstowe) but could also facilitate appropriate rural development in the district’s market towns and many villages. The other dismissed options were less flexible and would have restricted development only to the larger settlements. In 2009, the Council consulted on an updated preferred option which amended the proposed new allocations in the Eastern Ipswich Plan Area to 2,000 in order to better meet infrastructure needs and ensure the creation of a sustainable community.
1.24 Further detail on the Council’s preferred option decision making for housing numbers and housing distribution is contained in the Regulation 27 Statement of Consultation document (pages 49-56) (E12). In addition, the Council’s more detailed commentary on amending the EIPA allocations is contained in pages 106 – 109 of document E12.

1.25 For employment, EoEP policy E1 indicated that the Suffolk Haven Gateway area (Ipswich / Suffolk Coastal / Babergh authorities) should plan for an indicative jobs growth target of 30,000. As the Haven Gateway Employment Land Study (pages 31-32) (C2a-3), demonstrates, this equates to a need in Suffolk Coastal for around 8.5ha of new employment land. EoEP policy E3 also required the identification of strategic employment sites to deliver the expected jobs targets and the Council considered 2 options for this. The preferred option for identifying strategic employment sites was to identify three locations (as cited in CS policy SP5). The option which was dismissed would have only identified two locations and was considered to fail in recognising the full economic potential in the district.

1.26 Further detail on the Council’s preferred option decision making for new employment land is contained in the Regulation 27 Statement of Consultation document (pages 67-69) (E12).

f) Have reasonable alternatives to growth eastwards of the A12 to the south and east of Adastral Park been considered, including in terms of the scale of development proposed?

1.27 Yes. A summary of this is provided in the Sustainability Appraisal accompanying the Plan (Appendix 6 pages 131-135) (D2a-13 and G1-9). Early on (2007) in the process of preparing the CS, the Council determined that housing in the eastern Ipswich Plan Area (EIPA) should be located in one or at most two broad locations. A more dispersed approach to locating new housing was not considered to be a reasonable alternative in that it would create further pressure on existing inadequate infrastructure, be poorly connected to services, community infrastructure and jobs, and would not give rise to the provision of sufficient new infrastructure to support the enlarged population overall. This is consistent with the emphasis on creating sustainable communities which was previously found in PPS1 and PPS3 and is now repeated in the Framework eg. paragraphs 17 and 52.

1.28 The Council clearly identified, consulted upon and assessed 5 broad locations for strategic housing growth in the CS ‘Further Issues & Options’ document (D1-1) 2008. It selected Option 4 (South of old Martlesham/East of A12) as the preferred option for a minimum of 1,050 new homes to meet the EoEP requirements, being the most sustainable option due to its close proximity to key infrastructure facilities and a strategic employment site. The other 4 options did not provide a similar sustainability advantage.

1.29 Subsequently, in 2009 – through the CS ‘Updated Preferred Option’ (D1-3) - the Council proposed that the level of housing should be increased to 2,000 units, in order to ensure that the community facilities and infrastructure improvements which the Council wanted to deliver were achievable because the Council had serious concerns that a single allocation of 1,000 homes still...
would not facilitate sufficient infrastructure to support the new population which would have affected the soundness of the housing strategy. The Council, having thus decided through the iterative process that housing should not be dispersed, but consolidated in order to facilitate the creation of a sustainable community, proposes in the submission draft CS (E-4) that the full 2,000 dwellings should be in the allocation east of the A12.

1.30 Objectors have suggested that, rather than increasing the East of the A12 allocation from around 1,000 to 2,000 units, alternative options should have been considered for the location of the additional 1,000 properties. Alternative options, including locating 1,000 houses on the other four option areas identified in the 2008 consultation or dispersing an additional 1,000 houses throughout the Plan Area, had already been rejected on infrastructure provision and sustainability grounds. Moreover, there was no logical basis for treating these options as subsisting reasonable alternatives for the location of (the additional) 1,000 [or some fewer number of] dwellings because of the need to increase the allocation to 2,000 dwellings in a single location. There was accordingly no requirement to consult on these as alternatives for 1,000 dwellings to complement the option 4 preference for the initial 1,000 dwellings because they had been rejected and were no longer considered to be reasonable. On this basis, there arose no requirement to carry out an SA/SEA of them. However, (and given the perceived infrastructure justification for the increased provision for 2,000 houses), prior to the Council’s Cabinet (24/02/10) endorsement of the allocation of 2,000 houses in option 4, a further SA was carried out in January 2010, in order to assess the impacts of locating 2,000 houses on each of the five alternative option areas which were initially considered in 2008 for an allocation of 1,000 houses (notwithstanding the earlier rejection of areas 1-3 and 5 for this purpose). This SA (D2a-10 and D2a-11) was published and consulted upon prior to the Council’s decision to submit the plan for Examination. The relative impacts of these alternatives have, therefore, been taken into account and the information is contained in the Appendix 8 of the SA (D2a-13) for the Submission CS and the reasons for their rejection plainly stated.

1.31 In Heard v. Broadland District Council and Others [2012] EQHC 344 the Court acknowledge that the decision making process is an iterative one and that it is legitimate for choices to be made during the preparation of a plan which have the effect of narrowing down the options at a later stage. That is essentially what has occurred in the development of the Council’s proposed policy for housing in the EIPA and the pre-submission SA process has considered all reasonable alternatives.

g) Is there a clear audit trail showing how and why growth to the south and east of Adastral Park has been arrived at?

1.32 Yes. A summary of this is provided in the Sustainability Appraisal accompanying the Plan (Appendix 6 pages 131-135) (D2a-13 and G1-9). Early on (2007) in the process of preparing the CS, the Council determined that housing in the eastern Ipswich Plan Area (EIPA) should be located in one or at most two broad locations. A more dispersed approach to locating new housing was not considered to be a sustainable alternative in that it would likely create further pressure on existing inadequate infrastructure, be poorly
connected to services, community infrastructure and jobs, and would not give rise to the provision of sufficient new infrastructure to support the enlarged population overall. This is consistent with the emphasis on creating sustainable communities which was previously found in national planning policy PPS1 and PPS3 and is now repeated in the Framework eg. paragraphs 17 and 52.

1.33 The Council clearly identified, consulted upon and assessed 5 broad locations for strategic housing growth in the CS ‘Further Issues & Options’ document (D1-1) 2008. It selected Option 4 (South of old Martlesham/East of A12) as the preferred option for a minimum of 1,050 new homes to meet the EoEP requirements, being the most sustainable option due to its close proximity to key infrastructure facilities and a strategic employment site. The other 4 options did not provide a similar sustainability advantage. Discussion regarding the advantages / disadvantages and reasons for selecting the preferred option were clearly presented in the CS ‘Preferred Options’ document (pages 26-27) (D1-2).

1.34 In *Heard v. Broadland District Council and Others [2012] EQHC 344* the Court acknowledge that the decision making process is an iterative one and that it is legitimate for choices to be made during the preparation of a plan which have the effect of narrowing down the options at a later stage. That is essentially what has occurred in the development of the Council’s proposed policy for housing in the EIPA.

1.35 To conclude, the Council considers that the SEA Directive requirements have been fulfilled, and that the SA report (Appendix 6 pages 131-135) adequately summarises and repeats the clear reasons that were given for rejecting the alternatives at the time. The Council is also satisfied that those reasons remain valid today.

h) **Is the overall strategy sufficiently flexible to respond to an unexpected change in circumstance?**

1.36 Yes. The Council has a sufficient amount of available land, with headroom, to deliver the development proposed in the CS strategy. In addition, an early review is being proposed to look at a joint authority strategic approach to meeting the objectively assessed housing need as indicated in the Council’s letter to the Inspector dated 6th August 2012 (paragraphs 1.06 and 7.05).

1.37 The Council will continue with an ongoing process of plan monitoring to ensure that housing delivery is timely and the CS policies remain effective.
References to Core Document Library

C2a-3: Suffolk Coastal District Council Employment Land Availability Study, 2006, *Suffolk Coastal District Council*


D1-1: Suffolk Coastal Local Development Framework Core Strategy – Potential Directions for Strategic Growth East of Ipswich and Felixstowe/Walton & Trimley Villages Consultation (Regulation 25), 2008, *Suffolk Coastal District Council*


D1-3: Suffolk Coastal Local Development Framework Core Strategy & Development Management Policies – Housing Distribution – Updated Preferred Options 7-09 (Regulation 25), 2009, *Suffolk Coastal District Council*


E12: Regulation 27 – Statement of Consultation (also consultation statement Reg 22 (1) (c)(i)(ii)(iii) and (iv)), Jan 2012, *Suffolk Coastal District Council*


G1-9: Updated Sustainability Appraisal Appendix 6 – Iterations to Policies under the Core Strategy, Aug 2012, *Suffolk Coastal District Council*

References to Correspondence
No references to correspondence

References to Main Modifications
No references to modifications

References to Statements of Common Ground
Statement of Common Ground 2 – Between SCDC and the specialist environmental bodies, Natural England, RSPB, Suffolk Wildlife Trust and Deben Estuary Partnership

List of Appendices
No references to appendices