

Topic Paper:

Site Selection



First Draft Local Plan | July 2018
www.eastsuffolk.gov.uk/suffolkcoastallocalplanreview

1. Introduction

- 1.1 This topic paper has been produced to support the Suffolk Coastal First Draft Local Plan. It sets out the process that has been undertaken in relation to identifying preferred sites for allocation of employment or housing land in the Suffolk Coastal First Draft Local Plan.

2. National Policy

- 2.1 The National Planning Policy Framework requires all local planning authorities in their Local Plans to meet the needs for employment and housing.

- 2.2 In relation to employment, the NPPF states at paragraph 20:

'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.'

- 2.3 In relation to housing need, paragraph 47 of the National Planning Policy Framework states:

'To boost significantly the supply of housing, local planning authorities should:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and*

- *Set out their own approach to housing density to reflect local circumstances.'*

2.4 Paragraph 55 of the proposed amendments to the National Planning Policy Framework¹ carry forward this requirement to identify sites to meet the need for housing:

'Strategic planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Strategic plans should identify a supply of:

- *specific, deliverable sites for years one to five of the plan; and*
- *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.'*

2.5 The new Local Plan will need to identify sufficient land to meet the housing and employment land requirements identified for Suffolk Coastal over the period 2016 – 2036. However, as detailed in the sections below, the new Local Plan aims to be ambitious and to deliver in excess of minimum requirements in order to support ambitious economic objectives and to deliver more affordable housing.

3. Strategy and Spatial Distribution

3.1 The August 2017 Issues and Options document identified three options for spatial distribution of growth in Suffolk Coastal. These were (note the options are numbered 4-6 as Ipswich Borough options were numbered 1-3):

- Option 4: Continuation of existing approach
- Option 5: Focus on Ipswich and A14 transport corridor
- Option 6: A12 transport corridor and dispersed rural focus

3.2 Consultation responses received identified a mixture of views on the spatial distributions outlined in the Issues and Options document. In terms of actual numbers, options 4 and 5 received the greatest support but the common theme running through the responses was for a more refined approach – potentially merging some of the options.

3.3 A significant number of consultation responses highlighted the need to direct more growth to the rural areas. Communities highlighted that the current strategy is restricting growth in rural areas which is becoming detrimental to the communities – seen through the increased

¹ Published March 2018

closure of local services and facilities. Encouraging appropriate growth in rural areas is seen as a way of helping to retain the viability of these local services and facilities and where suitable, sites should be identified and brought forward.

- 3.4 Opportunities for large scale master plan developments to deliver the necessary infrastructure have been identified through consultation responses in Saxmundham and Felixstowe. Both of these options were highlighted in the Issues and Options but were exclusive of one another. Through further consideration by officers and the Local Plan Working Group, master plan developments are proposed in the First Draft Local Plan at Saxmundham and Felixstowe to deliver the necessary infrastructure, local services and facilities to provide for the new communities and address any deficits that have been identified through consultation responses.
- 3.5 Taking into account corporate aspirations and ambitions in the East Suffolk Business Plan, as well as the consultation responses, a strategy which distributes growth to Felixstowe, Saxmundham and the rural communities has evolved which has informed the approach to site selection.

4. Strategic Housing and Economic Land Availability Assessment

- 4.1 The Strategic Housing and Economic Land Availability Assessment (SHELAA) is a key piece of evidence which identifies the potential supply of land. The National Planning Practice Guidance sets out a methodology for identifying a future supply of land which is suitable, available and achievable, which has been followed in undertaking the Strategic Housing and Economic Land Availability Assessment.
- 4.2 A 'call for sites' was undertaken in autumn 2016 which invited sites to be submitted for consideration for allocation through the Local Plan review. Sites submitted, along with sites which had been submitted through previous consultations and call for sites exercises, were presented in the 2017 Issues and Options consultation document. The 2017 consultation also invited further sites to be submitted.
- 4.3 Criteria for assessing a site's suitability were developed to align broadly with other local planning authorities in the Ipswich Housing Market Area (Babergh District Council, Mid Suffolk District Council and Ipswich Borough Council). The criteria cover the following topics:
- Access to site;
 - Utilities capacity;
 - Utilities Infrastructure;
 - Contamination;
 - Flood Risk;
 - Coastal change;
 - Market attractiveness;

- Landscape / Townscape;
 - Biodiversity and Geodiversity;
 - Historic Environment;
 - Open space;
 - Transport and Roads;
 - Contributions to regeneration / re-use
- 4.4 In relation to the criteria on access to site and transport and roads, input has been received from Suffolk County Council as Highways Authority.
- 4.5 Consideration has also been given to how a site relates in scale and form to an existing settlement.
- 4.6 To determine a site's availability, consideration is given to whether the site has been submitted by the owner(s) of the land. In relation to sites that had been submitted or identified prior to 2016, availability checks have been undertaken (spring 2018) through writing to the submitter or by undertaking Land Registry searches where contact details were not held.
- 4.7 In relation to achievability, consideration has been given to whether there are any likely significant abnormal costs associated with development of the site. However, at this stage it is difficult to conclude with any certainty that development of a site would not be viable during the Local Plan period.
- 4.8 Sites which are assessed as being suitable, available and achievable are considered to be 'potential' sites.

5. Approach to Identifying Employment Allocations

Ipswich and Waveney Economic Areas Employment Land Needs Assessment

- 5.1 Suffolk Coastal, along with Waveney, Ipswich, Babergh and Mid Suffolk Councils commissioned Nathaniel Lichfield & Partners to prepare an Employment Land Needs Assessment (March 2016). The assessment provides an update to economic needs for each authority and considers future quantitative land and floor space requirements alongside related qualitative factors for employment uses.
- 5.2 The study considers land and floor space implications for B class uses and identifies requirements for employment land across each authority.

Ipswich Economic Area Sector Needs Assessment

- 5.3 To inform site selection considerations for employment related sites, the authorities across the Ipswich Functional Economic Area commissioned Lichfields to prepare the Ipswich

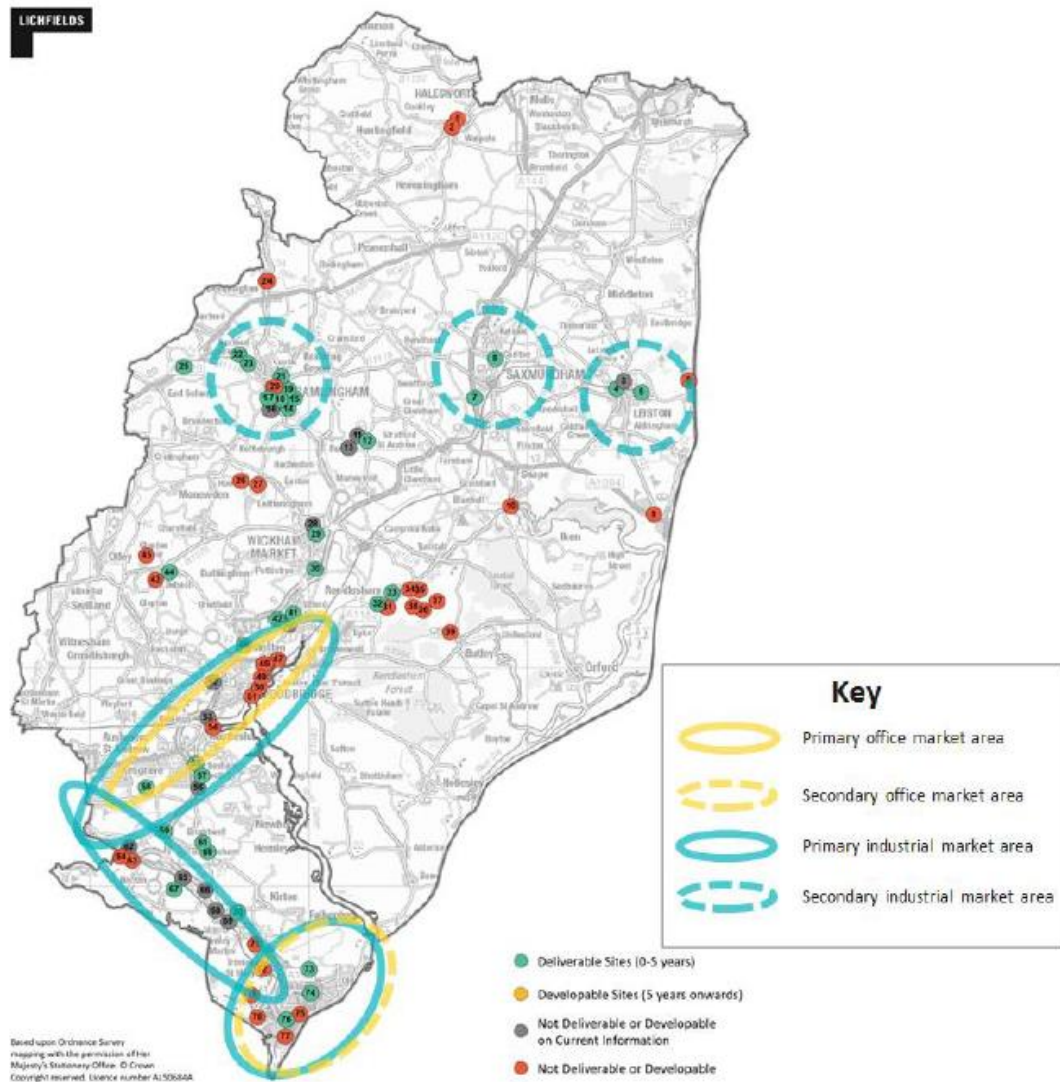
Economic Area Sector Needs Assessment (September 2017). The sector needs assessment considered the current and future growth potential of key sectors of the economy. The Sector Needs Assessment helps to inform future economic growth across the district and identify land needs and sector requests for both office and industrial uses. Across the Economic Area a total of 55.0ha of land was identified as the requirement, with 14.4ha of this required in Suffolk Coastal over the period 2014 - 2036.

- 5.4 The sector needs assessments which included consultation with a range of stakeholders, including commercial agents, industry representatives and business organisations identified the key sectors of the economy (agriculture, business and professional services, computing and technology, construction, education, energy, waste and utilities, health and care, hospitality and leisure, manufacturing, retail, transport and logistics and wholesale). As well as identifying the key sectors the assessment also identified key markets of demand for each sector.

Ipswich Economic Area Employment Land Supply Assessment

- 5.5 To help the Council consider allocations related to employment sites, a Call for Sites exercise was undertaken in autumn 2016. The call for sites, along with the responses to the Issues and Options consultation identified a wide variety of sites across the district being made available for employment related uses.
- 5.6 Each of these sites (as well as those currently allocated for employment uses in the Local Plan) were considered by Lichfields as part of the work prepared for the Ipswich Economic Area in the Ipswich Economic Area Employment Land Supply Assessment (March 2018). The purpose of the Lichfields work was to evaluate the quality of current and potential employment land in the district and assess the attractiveness of these sites to the market and their likely deliverability.
- 5.7 The study used a methodology broadly similar to that being used by the Council for the SHELAA to consider sites for other uses as part of the Local Plan Review.
- 5.8 Lichfields considered 79 sites across the district comprised of existing employment allocations and sites submitted through the call for sites exercises and public consultation period. In total the site assessments cover approximately 1,867ha of land.
- 5.9 The assessments identified a number of suitable sites for employment uses and these have provided a background to the site selection work in the Local Plan.
- 5.10 As well as considering each site, the assessment also identified the areas across the district which are most preferable for the office and industrial markets. The image is taken from Fig 4.7 of the Land Supply Assessment.

Figure 4.7 Assessed Sites and Property Market Areas in Suffolk Coastal



5.11 It is clear from the figure above that the evidence points towards parts of the district which are most attractive to the sectors operating across the district. Focused on the A12, A14, Felixstowe and the Market towns, the evidence is being used to inform decisions on site selection.

Port of Felixstowe Growth and Development Needs Study

5.12 In response to consultation responses received during the Issues and Options which identified a need for further land to support the Port of Felixstowe, the Council commissioned Lichfields to undertake the Port of Felixstowe Growth and Development Needs Study (2018). The purpose of the study is to understand the likely future growth potential of the Port of Felixstowe and the potential need for additional land allocations in the Local Plan.

- 5.13 The important economic role of the Port of Felixstowe is acknowledged throughout the economic evidence base but does not specifically analyse detailed land requirements associated specifically to the port and the related businesses. The study forecasts a variety of scenarios (high, medium and low) which have been informed by the Port of Felixstowe and market sector evidence.
- 5.14 The evidence forecasts an increase in container throughput into the country and maintains Felixstowe's market share in each scenario (market share is approximately 40% of all containers entering the country). In respect of land requirements, the evidence forecasts a need for between 26.3ha (low) and 103.8ha (high) of land. This is made up of land for warehousing as well as open storage to accommodate the scale of container traffic throughput growth that is expected to occur at the Port over the plan period.
- 5.15 Feedback during the formulation of the evidence identified that for viability reasons, off-port supporting activity would be ideally located between the Port and the Orwell Bridge. Taking this into account, ten sites were considered as part of the study (taken from the list of sites identified through 'call for site's exercises and public consultation responses).
- 5.16 Although still draft at this stage, the most suitable sites identified as part of the evidence are land at Innocence Farm and land adjacent the A12/A14 Seven Hills junction. It will be for the Local Plan to consider the extent of these allocations and reflect on the land requirements as part of any future land allocations.
- 5.17 By using the evidence base outlined above, the Council is able to focus employment related allocations to those sites within the identified areas most attractive to the market. Focussing future allocations into these areas will ensure that the Council has greater confidence in the deliverability of these sites over the plan period.
- 5.18 Existing employment allocations will be carried forward such as Rendlesham and Debach airfields to ensure that the current portfolio of sites is maintained to encourage a variety of economic opportunities across the district.
- 5.19 Many sites across the district enable economic opportunities through site specific planning permissions or certificates of lawfulness but are not allocated for employment uses in the Local Plan. These sites will remain in their current form and should they come forward for redevelopment over the plan period will be judged against the other economic policies in the Local Plan such as employment uses in rural areas or the conversion of buildings in the countryside.
- 5.20 Due to the relatively small amount of land required across Suffolk Coastal, future employment related allocations will be focussed on uses for specific sectors which are broadly located within the areas of market demand as identified in the Employment Land Supply Assessment. Although additional sites have been made available across the rest of

the district, these are not anticipated to be taken forward as new allocations as the land requirement can be met through allocations targeted at specific sectors as opposed to general employment allocations spread across the district.

6. Approach to Identifying Housing Allocations

Housing Requirement

- 6.1 Options for defining the housing requirement for the new Local Plan were consulted upon through the August 2017 Local Plan Review Issues and Options consultation document² and were based upon the objectively assessed need which was identified through the Strategic Housing Market Assessment³. This equated to 460 dwellings per annum (10,111 dwellings over the period 2014 – 2036). The Issues and Options consultation set out three scenarios for growth and in terms of housing numbers – objectively assessed need (scenario A), objectively assessed need plus 20% (scenario B) or objectively assessed need plus 40% (scenario C).
- 6.2 In September 2017, the Government consulted on a new national standard methodology for calculating housing need⁴, using published household projections and ratios of house prices against work place earnings. These proposals have been carried forward through the recent consultation on changes to the National Planning Policy Framework and the accompanying Planning Practice Guidance. Based upon the new national standard methodology, using the illustrative figures published in September 2017, the baseline housing requirement for the Suffolk Coastal Local Plan Review is 495 dwellings per annum. Applied to the period 2016 – 2036 this equates to 9,900 dwellings.
- 6.3 Following the Issues and Options consultation, the Local Plan approach is broadly aligned to scenario B and which represents the standard methodology figure plus 10% - an annual figure of 545 dwellings and a total for the Local Plan period of 2016 – 2036 of 10,900 dwellings. This reflects the Council's ambitions for economic growth and boosting the delivery of housing, including affordable housing. A further indicative 10% is added to that figure to provide flexibility and contingency in relation to delivery of the requirement.
- 6.4 The housing requirement will need to be revisited following consultation on the First Draft Local Plan to take on board new household projections which are anticipated in September 2018.
- 6.5 In order to indicate the number of dwellings to be planned for, completions, outstanding permissions and dwellings on sites which have a resolution to grant subject to Section 106 agreement are subtracted from the overall requirement. As a starting point, it is also

² Help Plan the Future of the District: Issues and Options for the Suffolk Coastal Local Plan Review (August 2017)

³ Strategic Housing Market Assessment for the Ipswich and Waveney Housing Market Areas (Part 1) (Peter Brett Associates, May 2017)

⁴ Planning for the Right Homes in the Right Places: consultation (Department of Communities and Local Government, September 2017)

intended that any existing site allocations (taken from the Site Allocations and Area Specific Policies Development Plan Document and the Felixstowe Peninsula Area Action Plan) are carried over into the new Local Plan, however consideration is to be given to the likelihood of delivery.

- 6.6 Based on the above, table 1 below identifies the residual number of dwellings that should be identified on new sites through the Local Plan review.

Table 1 – residual housing need calculation

	Number of dwellings
Completions (1.4.16 – 31.3.18)	1,130
Outstanding planning permissions (31.3.18)	4,128
Dwellings with resolution to grant planning permission, subject to S106 (31.3.18)	2,389
Allocations in current Local Plan or Neighbourhood Plans (<i>without</i> permission or resolution to grant subject to S106) (31.3.18)	976
Total commitments (31.3.18)	8,623
Proposed housing requirement (2016 – 2036): new national standard method plus 10% (545 x 20 yrs)	10,900 (545 dwellings per annum)
Residual need (requirement minus commitments)	10,900 – 8,623 = 2,277
Residual (2,339) plus contingency of 10% on top of housing requirement (1,090)	3,370 indicative number of dwellings to be planned for

- 6.7 Distribution of the residual housing need is based upon an approach which considers:
- The preferred approach to spatial distribution (as outlined in section 3 above);
 - The revised settlement hierarchy and opportunities / constraints identified at the settlement level;
 - The suitability of potential sites.
- 6.8 In addition to site allocations, an estimated annual windfall allowance will be identified and will contribute to planning to deliver the residual figure. The National Planning Policy Framework states that '*Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently*

become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.’ To avoid potential double counting with sites that already have planning permission, and for consistency with the Council’s annual five year housing land supply statement, the windfall contribution of 50 dwellings per year will be applied from 2020/21 onwards.

Identifying opportunities within settlements

6.9 A review of the settlement hierarchy (see settlement hierarchy topic paper) is being conducted as part of the Local Plan Review. The revised settlement hierarchy categorises the settlements as follows:

<p>Major Centre:</p> <ul style="list-style-type: none"> • Felixstowe • East Ipswich - Kesgrave, Martlesham Heath, Purdis Farm, Rushmere St Andrew (excluding village)
<p>Market Towns:</p> <ul style="list-style-type: none"> • Aldeburgh • Framlingham • Leiston • Saxmundham • Woodbridge (with parts of Melton and Martlesham)
<p>Large villages</p>
<p>Small villages</p>

6.10 In order to meet the housing requirement under the preferred strategy for spatial distribution it is not necessary to allocate land in every settlement. Other than for Felixstowe and Saxmundham, for which strategic scale growth is proposed, consideration was given to the potential for other settlements to accommodate additional growth in relation to the following factors set out below. This was undertaken prior to considering whether individual sites should be identified as preferred allocations in order that the site selection process could focus on those settlements which present fewer constraints and greater opportunities. This was done in a qualitative way in order to conclude for each settlement the likely scale of potential. Other than SHELAA capacity, no one factor below is identified as an absolute constraint.

6.11 SHELAA capacity – Consideration was given to the outputs of the SHELAA in terms of the identified potential capacity for each settlement.

6.12 School capacity – using information provided by Suffolk County Council on capacity in schools and potential for schools to expand, for those schools where there is capacity and in particular where numbers are predicted to decline, consideration was given to whether

some growth might help to support the school. Where schools are identified as being, or predicted to be, over capacity this was identified as a factor which may weigh against new development.

- 6.13 Highways modelling – Initial outputs from the highways modelling, which identify whether capacity issues would exist by 2036 without any growth assumptions applied, indicate areas where additional growth is likely to lead to additional pressure on the highway network and areas where the highway network may be able to accommodate additional growth.
- 6.14 Potential impact on European sites – The location of settlements in relation to the internationally protected Special Protection Areas and Special Areas of Conservation was considered, in that locations closer to SPAs and SACs are likely to have greater potential for significant effects on these sites.
- 6.15 Outcomes from one to one meetings with Parish councils – During the 2017 Issues and Options consultation, each Parish and Town Council in the District was offered a one to one meeting with officers. Where meetings were held the feedback from Parish and Town Councils in relation to their aspirations for future growth was considered.
- 6.16 Consultation feedback – Consultation feedback in relation to the sites consulted on as part of the Issues and Options consultation was considered to gauge whether there was any clear collective view on the potential for future growth in a settlement.
- 6.17 Following this process, a check was undertaken to ensure that there was likely to be distribution across the District.

Areas with designated neighbourhood plan areas

- 6.18 The draft revisions to the National Planning Policy Framework would require plans to set out a housing requirement figure for designated neighbourhood areas, and notwithstanding this it is acknowledged as something that neighbourhood plan groups wish to be provided with in order to focus the scope of their approach to housing. Whilst there are 18 designated neighbourhood areas in the District, they are at different stages of preparation (including 7 ‘made’ neighbourhood plans) and are working towards different scopes and objectives. Consideration has therefore been given to the circumstances of each neighbourhood plan area and the relationship of that area with the emerging strategy in the new Local Plan in determining whether it is appropriate to provide a housing number for the neighbourhood plan to deliver.

Identifying preferred sites for housing allocations

- 6.19 Focusing initially on those settlements identified as having a greater degree of potential, as described in paragraphs 6.9 – 6.18 above, potential sites identified through the SHELAA process have been further assessed with a view to identifying preferred sites.

- 6.20 This process considered the following:
- SHELAA conclusions – these were reviewed to identify any issues which may need to be mitigated;
 - Sustainability Appraisal conclusions – these were reviewed to identify whether there were any site specific issues;
 - Consultation responses from the 2017 Issues and Options consultation – Over 1,000 responses were received in relation to sites, including from statutory consultees;
 - Feedback from one to one sessions with Parish and Town Councils;
 - Initial outputs from the Landscape Character Assessment and Settlement Sensitivity Assessment;
 - Other constraints to development which may affect, for example, the area of the site that could be developed;
 - Whether development of the site would be inconsistent with any other emerging policy in the Local Plan review.
- 6.21 A number of sites put forward are within the settlement boundary and it has not been necessary to consider whether these would be suitable allocations as the principle of development is accepted and such sites may therefore come forward as windfall sites. These were nevertheless assessed through the SHELAA and Sustainability Appraisal.
- 6.22 The contribution in terms of indicative dwelling numbers has been reviewed throughout the process in an iterative manner to ensure that this aligns with the residual housing requirement.
- 6.23 With Suffolk County Council, the four local planning authorities in the Ipswich Housing Market Area have commissioned WSP to undertake transport modelling. Based upon the preferred broad strategy, two scenarios for growth have been modelled in relation to Suffolk Coastal District. These scenarios have primarily focussed upon:
- Different scales of growth at Felixstowe;
 - Different locations for growth around Saxmundham;
 - Different scales of growth on the eastern edge of Ipswich;
 - Different scales of growth on the A12 corridor.
- The results of the modelling have been considered in assessing potential site allocations and is part of the evidence base supporting the Local Plan.
- 6.24 Consideration has been given to ensuring that a mix of sizes of sites is identified, acknowledging also that opportunities for small scale development could come forward as windfall through the infill and countryside policies. Sites under 0.2ha are not considered to represent a reasonable size which would warrant allocation.
- 6.25 Following initial selection of preferred sites further discussions have been held with Highways and Education at Suffolk County Council and with the NHS and the Ipswich and

East Suffolk Clinical Commissioning Group in order to determine any specific requirements related to the preferred site allocations.

7. Next Steps

- 7.1 The process of site selection for the Local Plan will be further informed by consultation responses that the Council receives and decisions made at this stage will be refined and reconsidered as appropriate.
- 7.2 Consultation responses will be considered against the site selection work that has taken place so far along with further Sustainability Appraisal Assessments and emerging evidence base that supports the Local Plan.
- 7.3 This topic paper will be reviewed as necessary in parallel with future Local Plan documents.