

4. Background to County Strategy



Willis Corroon, Ipswich

4.1 The county strategy establishes principles for the scale and location of change, for transport provision, and for the protection and enhancement of the environment. The proposals have been influenced by the past and projected future changes discussed below, and take into account responses to the various consultation exercises undertaken during the preparation of the Plan.

Past Trends

- 4.2 Net inward migration continues to contribute the majority of Suffolk's population growth. The rate fluctuates from year to year but has averaged 3,400 pa between 1981-1999. The total number of people moving into or out of Suffolk each year to produce these net figures is much higher at around 40,000 in 1991, with nearly 30% moving to or from the three adjoining counties. Additional moves take place entirely within the county; there were nearly 45,000 of these in 1991. Recent changes in the housing market may have led to higher gross flows, although data to confirm this is not yet available.
- 4.3 56,400 new dwellings were completed between 1981-1999. 21,800 of these were completed after 1991, at a rate of 2,700 pa. These dwellings, while adding to the overall county stock, are only accommodating a small proportion of the new households being formed and households migrating into Suffolk. The existing stock will continue to meet most of these needs through the operation of the housing market and the provision of social housing.
- 4.4 45,000 net new jobs were created between 1981 and 1991 and a further 18,000 between 1991 and 1998, with a gradual restructuring of the economy involving a decline in agriculture, fishing, manufacturing and construction; a substantial increase in service jobs; and expanding self employment. Percentage unemployment last peaked in April 1993, at 8.2% for Suffolk. In May 2001 it was 2.4% compared with 3.2% for the UK as a whole.
- 4.5 As population and economic activity has grown, so has the demand for travel. The former Department of the Environment, Transport and the Regions' (DETR) 1997 National Road Traffic Forecasts suggested future growth at between 0.5% and 2.8% per annum. The significance of private motorised transport in meeting current needs in Suffolk is demonstrated by Local Transport Plan (LTP) monitoring data showing that in Autumn 1999, 63% of journeys for all purposes were made by car or motorcycle.

4.6 Up until recently, no systematic and comprehensive monitoring of change in Suffolk's stock of environmental assets had been undertaken. In March 1997, the Suffolk local authorities published "Suffolk's Environment: Towards Sustainable Development", an audit of the Suffolk environment, as a basis for future monitoring work. Three monitoring papers on the audit have since been published, reporting the progress of over 100 indicators. These help measure the quality of life in Suffolk, the impact of the planning system on the county's environment, and the degree to which Suffolk is contributing to sustainable development in the United Kingdom.

Economic and Employment Change up to 2016

- 4.7 Economic trends likely to affect labour demand and supply over the Plan period include:
- (a) structural changes and rationalisation in industries such as farming and financial services leading to reduced labour demand in these areas;
 - (b) proportionately far more part-time and fixed contract jobs;
 - (c) proportionately more new employment opportunities for women than men;
 - (d) increasing demand for skilled and qualified staff, paralleled by a continued decline in demand for unskilled labour;
 - (e) greater locational flexibility in some areas of business activity;
 - (f) strong growth in the transport and distribution, professional and business services, technology and media sectors.
- 4.8 National Government, through recent planning guidance, and the East of England Development Agency (EEDA) are promoting the concept of business clusters as drivers of economic growth. Initiatives such as IP-City and the Haven Gateway are examples of how the new concept is being applied in Suffolk. There needs to be a clear focus for facilitating and promoting this approach through the Structure Plan.

Population Change and Housing Needs up to 2016

4.9 The philosophy of previous versions of the Structure Plan has been to accommodate population growth in Suffolk consistent with natural change in the population and net inward migration at long term historic trend rates.

- 4.10 Past growth has reflected the availability of jobs across most of the county, favourable house prices compared to the adjoining south-east region, and Suffolk's high quality of life. The exceptional conditions of the late 1980's saw these factors operating particularly strongly. Today, economic conditions and business practices are more likely to support rates of employment growth evident during the 1990s rather than the higher rates experienced during the 1970s and 1980s.
- 4.11 All the above factors will influence future housing development pressures in Suffolk. The effect of these pressures on the overall aim of securing sustainable development also needs to be considered.
- 4.12 The County Council does not believe it is appropriate to identify an absolute "environmental capacity" for Suffolk, beyond which any further development could be said to be unacceptable. However continuation of rates of population and housing growth proposed in previous Structure Plans beyond 2006 would be likely to involve the crossing of specific development thresholds in some settlements, with significant environmental impacts. The types of impact would include the effects of large scale greenfield development on the landscape settings of some towns and villages; loss of agricultural land; and the generation of additional car and freight traffic on the road network.
- 4.13 RPG6 issued in November 2000 makes provision for housing growth in Suffolk of 2,600 per annum between 1996-2016. This rate is similar to that implied by the most recent 1996-based national projections of population and household growth, prepared by the Office for National Statistics (ONS) and the former DETR. The Structure Plan makes provision for a slightly higher rate of housing growth of 2,650 per annum, allowing for some reduction in the number of sharing and concealed households and some increase in the number of second and holiday homes over the lifetime of the Plan. This level of provision is believed to constitute a robust basis for future planning, generally consistent with the ability of the county to accommodate change in an acceptable way. Under the terms of the Government's "plan, monitor, manage" approach to housing provision, the level will be reviewed on a regular basis and changes introduced through future Plan alterations if shown to be necessary.
- 4.14 The Plan assumes that:
- the total population of Suffolk will increase by 57,100 between 1996 and 2016, from 661,600 to 718,700, or just over 2,850 per annum, although there will be more deaths than births in this period;
 - net inward migration of population will occur at about 3,450 per annum between 1996 and 2016: a total of 69,000 by the end of the review period. County Council estimates show the average between 1981 and 1999 was 3,400. The assumption is therefore considered to be robust.
 - the expected housing needs of the existing population and those of the population increase resulting from net immigration, together with the Government's target for 3% housing vacancy, will all be met.
- 4.15 The proposed increase in Suffolk's dwelling stock of 2,650 per annum or 53,000 between 1996 and 2016 compares with an actual increase of about 2,700 per annum or 21,800 between 1991 and 1999. The proposals would nevertheless allow for expected locally-generated needs to be met, and for a substantial volume of net immigration to be accommodated during the review period.
- 4.16 The characteristics of the households which will form also have implications for the type of housing to be provided. Although married couples will continue to comprise the majority of households in 2016, their numbers are expected to fall slightly over the plan period. Of households in categories where numbers are increasing, some 54% will comprise one person households; around 19% will be households consisting of people sharing, and 25% will be cohabiting couples. While there needs to be choice in the housing supply to meet the aspirations of individuals, it seems reasonable to expect an increase in demand for smaller dwellings to follow from the substantial increase in one person households.
- Components of Dwelling Change up to 2016**
- 4.17 53,000 dwellings, annualised at 2,650 per annum over the 20 year period 1996-2016, is the county total in policy CS8. New dwellings to provide for growth up to 2016 will come from the following sources:
- dwellings provided between 1996 and 1999: estimated at 7,600; subtracting this from the overall housing requirement of 53,000 dwellings for 1996 - 2016 leaves 45,400 dwellings to be provided for in the seventeen years 1999 – 2016.
 - planning permissions and allocations in local plans at 1999. It is likely that not all of these will be implemented by 2016 and District Councils will need to allow for this in deciding

upon the scale of new land allocations. A 5% allowance for non-implementation would mean 21,600 existing commitments coming forward during the period 1999 - 2016.

- (c) development of currently unallocated or “windfall” sites, including conversions and infill. Analysis for the period 1988 – 1998 indicates that proposals for nearly 900 dwellings a year have been approved on sites of under 0.4 ha or under 10 dwellings, together with a variable but significant number on larger sites. An assumption of a contribution of 665 a year from small windfall sites (11,300 between 1999 and 2016) is considered reasonable, taking into account past experience.
- (d) new allocations in local plans. Taking into account the contributions under (a), (b), and (c) above, specific allocations for approximately 12,500 dwellings on larger sites of 10 or more units or greater than 0.4ha in size might be required to meet the county’s projected needs up to 2016.
- (e) some of the new allocations will be on “brownfield” sites. The County Council defines brownfield development as the redevelopment or intensification of use of land within settlements which has been built on, or previously built on and subsequently cleared. Increasingly the Government is seeking housing provision linked to the regeneration of towns. A national target of 60% of new provision to be made on brownfield land has been set, while RPG suggests a figure of at least 50% should be sought in East Anglia. A target of 60% for housing not already committed may not be attainable in Suffolk. However, latest estimates prepared by District Councils within the framework of the specification for the National Land Use Database (NLUD) indicate some 6,000 dwellings could be provided on large brownfield sites, some 3,500 of which are in Ipswich Borough. This suggests nearly 50% of the allocations referred to in (d) could theoretically be made on such sites. A significant proportion of future small windfall approvals is also likely to meet the brownfield definition.

4.18 Nearly 7,700 of Suffolk’s housing commitments at mid-1999 were on previously-developed land, while the majority of the small windfall allowance of 11,300 between 1999 – 2016 identified above is likely to accrue on such land. If the potential on large sites is realised, and commitments and small windfalls come forward as expected, some 24,200 of the total housing provision of 45,400 between 1999 and 2016 would be being made on

previously-developed land, or about 53%. Figures for each District will need to be reviewed in the course of local plan preparation, particularly in the light of the conclusions of urban capacity studies.

Distribution of New Development

- 4.19 The previous Structure Plan argued that generally the provision of utilities and services at the lowest cost per head of population, and a close relationship between homes and a wide range of job opportunities, could best be achieved by seeking to concentrate most new housing and employment in towns. Such an approach helps to minimise total travel needs and allows for the more intensive use of public transport. The Plan did not intend that village housing development should play a major numerical part in meeting Suffolk’s housing requirements, the emphasis being primarily on infilling and small scale development identified in local plans.
- 4.20 Planning Policy Guidance and Regional Planning Guidance from Government and the document “Planning for the Communities of the Future” (1998) emphasise the need to promote more sustainable forms of development. PPG13 “Transport” (2001) stresses that development plans should accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling. In rural areas, most development for housing, jobs, shopping, leisure and services should be located in local centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside.
- 4.21 PPG7 “The Countryside - Environmental Quality and Economic and Social Development” (1997) states that Development Plans should help to strengthen existing local centres in rural areas, promote a range of everyday community, shopping and employment opportunities, and aim for a better balance between employment and housing. Plans should promote housing development within existing communities which help sustain local services and employment, and encourage employment opportunities appropriate in scale to rural centres. PPG3 “Housing” (March 2000) offers further guidance on circumstances under which villages may be suitable locations for significant additional housing.

4.22 In Suffolk, despite the amount of development that has taken place in villages and rural areas – 810 dwellings a year between 1981 and 1999 or 25% of the total - services continue to be lost. The rate of loss of such services is faster in Suffolk than in the country as a whole. This suggests that population thresholds needed to retain these services are continuing to rise, supporting the view that a strategy which seeks to maintain village services simply through dispersal of new housing will not be successful. In most cases other action will be necessary, some examples of which are touched on in paragraphs 4.39 and 4.40 below. The scale of housing growth necessary to have a noticeable effect on the viability of village services is generally likely to have a substantial impact on the character of those settlements.

4.23 In the light of these considerations, the Plan strengthens the emphasis on the role of the towns, compared to the majority of villages, in accommodating new housing. This should lead to a more concentrated pattern of new development, better related to existing employment and services, and produce slower growth in private car trips on rural roads. A degree of restraint on new housing development is proposed for the majority of villages in Suffolk. Nevertheless continued infilling, some small allocations in local plans, provision of affordable housing on ‘exceptions’ sites and the take-up of existing commitments will provide for further growth, thereby helping to support existing services. At mid-1999, 5,600 dwellings were committed by planning permission or local plan allocation in the villages and rural areas of Suffolk. Where development does take place planning obligations may provide a basis for additional provision of facilities and services. Other measures beyond the scope of land use planning are also likely to be required.

The Role of Specific Settlements

4.24 In identifying locations for new housing which comply with the strategic aims and objectives the following principles have been taken into account:

- (a) the largest towns have the strongest employment and service base and the greatest potential for increased use of transport modes other than the private car. Subject to environmental constraints, they should play a leading role in meeting new housing needs;
- (b) other towns and the largest villages can be promoted as employment and service centres for their surrounding areas, and as locations for some additional housing;
- (c) the limited employment and services of the

majority of villages and their dependence on private transport for access to larger settlements for those purposes suggests that they are unlikely to be able to accommodate significant amounts of new housing in a way which is sustainable in transport terms.

4.25 The following factors are also relevant:

- (a) environmental constraints;
- (b) spare capacity in local services and utilities and the economics of additional provision;
- (c) the capacity of the local transport network and levels of congestion;
- (d) transport links to the larger towns, especially by public transport;
- (e) the strength of the local economy and the role of the settlement as a housing, employment and service centre;
- (f) the views of local communities as elicited through local plan consultation exercises.

4.26 The previous Structure Plan identified a leading role for Ipswich, Bury St. Edmunds, Stowmarket and Lowestoft in accommodating new housing and employment development. Ipswich and Bury St. Edmunds have strategic locations on the A14 Trunk Road and east-west rail route. Together with their adjoining parishes they provide the two largest concentrations of employment in the county, and have experienced balanced growth in housing and jobs since 1981, including 42% of county job growth since that date. They are also major retailing, service and leisure centres. By virtue of the close geographical relationship between large numbers of people, employment, and services, they have the greatest potential for encouraging travel by means other than the private car. Subject to local environmental and transport implications, a sustainable strategic approach to the location of new development must continue to involve an important role for these two towns in accommodating growth. A major development proposal at Ipswich in the previous Plan - the redevelopment of the former Ipswich Airport for housing and other uses as the Ravenswood community - is now incorporated in the Ipswich Local Plan and construction is well under way. The Local Plan also identifies significant brownfield development opportunities around the Wet Dock area.

4.27 Stowmarket enjoys similar external transport links to Ipswich and Bury St Edmunds but here they have provided the opportunity for significant outcommuting, mainly to those larger towns. Large scale housing and employment development to the east of the town was proposed in the Local

- Plan and is now under construction. It remains to be seen whether this will reinforce existing commuting patterns, or lead to more self contained growth. Although for this reason further major provision for housing is not envisaged at least until this scheme is substantially complete, some additional development can be justified on the basis of the criteria in paragraph 4.25.
- 4.28 As part of its role as a sub-regional centre for the north east of the county, Lowestoft has previously been identified as a location for significant housing and employment growth. Although housing development is continuing, particularly in the north and south-west of the town, total employment is falling. Since 1993, total employment in Lowestoft has fallen by 4.6% and unemployment remains high. The average rate of unemployment in Lowestoft over the three years July 1995 to July 1998 was 11 %, considerably above the county and national averages. The rate in the Lowestoft and Beccles Travel to Work Area, newly defined in July 1998, was 5.0% in May 2001, compared with the Suffolk average of 2.4% and the UK of 3.2%. A bid for Assisted Area status for Waveney District was submitted to Government in October 1998 on behalf of Suffolk County and Waveney District Councils, and Assisted Area and Objective 2 status was subsequently granted for 12 and 14 wards under these respective designations, including Lowestoft.
- 4.29 Despite past improvements to the A143/A146 and A11/A47, and further progress being made on A11 improvements, external road links to Lowestoft remain relatively poor. In addition, the A12 between Ipswich and Lowestoft has been detrunked. Community involvement on the development of a Lowestoft Transport Action Plan began in 1999 and is continuing.
- 4.30 In the light of the above factors the Plan places less emphasis than previously on the role of Lowestoft in meeting county housing needs, while retaining the commitment to measures to improve the local economy and employment. However, there appear to be significant opportunities for new housing and employment within the built up area of Lowestoft, particularly to the south of Lake Lothing, which should be fully investigated in providing for future development needs.
- 4.31 Many of the characteristics and problems of Lowestoft identified in paragraph 4.28 are shared by Great Yarmouth, a short distance to the north in Norfolk. The Norfolk and Suffolk local authorities are seeking to ensure compatibility in strategic guidance, with future development in the area having regard to the advice in RPG policy 20 on the development and implementation of a vision for this part of the region.
- 4.32 Sudbury and the contiguous built up area of Great Cornard have a substantial range of service provision and a significant employment base. A high proportion of existing residents work in the town and there has been continued recent demand for expansion of local firms. There are opportunities for sustainable development with some further growth.
- 4.33 Haverhill saw rapid expansion in the 1960s and 1970s and more recently has experienced further growth arising from development pressures in the Cambridge Sub-Region. Significant employment and housing commitments remain and some additional housing development beyond those commitments could take place if matched by employment growth. Substantial further expansion should only be considered as part of a broader response to the pressures on the Cambridge Sub-Region, and only if a sustainable pattern of development can be achieved.
- 4.34 The previous Plan proposed that an additional 1,500 dwellings with associated employment development should be provided for at Red Lodge. The proposal is expected to contribute to development needs both up to and beyond 2006, relieving pressure on Newmarket, with its sensitive racing-related townscape and landscape setting. The District Council expects development to take about 12 years to complete. The Red Lodge proposals are now incorporated into the adopted Forest Heath Local Plan, and a Master Plan has been prepared.
- 4.35 The role of small towns in rural areas is undergoing fundamental change. Modern agricultural production and distribution methods have often superseded their function as the hub of an agricultural economy while economic thresholds for supporting other services have increased, largely because of increasing personal mobility, undermining the part played by small towns in the wider economy of rural areas.
- 4.36 Other factors operate to their advantage. Consumer preference in both the retail and tourism sectors increasingly focuses on the local distinctiveness, lack of congestion and attractive rural setting which are offered by many of Suffolk's small towns. This can contribute to the success of their economy. Meanwhile, they still need to perform a key role in providing services and employment if rural communities are to live in a sustainable way. This role needs to be protected and where possible enhanced through the planning process.

4.37 In addition to the proposed variation in village policy outlined in paragraph 4.23, the achievement of a more concentrated pattern of new development would be assisted by further growth in some medium-sized and smaller towns and larger villages. These settlements would continue to function as employment and service centres for their surrounding areas. Their identification will be a matter for local plans having regard to the factors set out in paragraph 4.25. Local Plans should seek to enhance the service and employment roles of these settlements. This could be pursued through settlement regeneration strategies which involve participation of the community in developing an agreed vision for the future of their town. Studies have already been undertaken in Eye, Bungay and Halesworth and have identified regeneration opportunities to be implemented through use of UK and European funding sources. Under the new Rural White Paper Market Towns Initiative, other market towns in Suffolk will be preparing Vision Statements and Action Plans.

4.38 In smaller villages, as elsewhere in the county, a 'balanced' community is the one most likely to achieve the objectives established in section 3, in particular those flowing from Strategic Aim 2. Balance in this context implies a range of age groups and types of household; as far as possible the provision of employment, services and facilities as well as housing; and the opportunity for all to travel, not just those with access to a car.

4.39 In paragraph 4.22 it was concluded that significant housing growth is not necessarily the most appropriate means of ensuring the viability of existing services and facilities. Other approaches involving the development plan system include more careful control of large edge-of-town convenience goods stores, which could otherwise have a significant impact; and limiting changes of use in the village itself which could result in the loss of facilities. Other measures are beyond the scope of the land use planning system, but may be beneficial in association with development plan policies. These could include business rate relief, and schemes to improve the competitiveness of rural facilities.

4.40 Rural transport subsidies underwrite the provision of many bus services in Suffolk, and the increase in funds available to the County Council has allowed an improvement to such services since Autumn 1998. Development plan policies encourage the introduction of appropriate employment at villages across Suffolk. The identification of need for affordable housing can be the first step in bringing forward schemes to meet the requirements of particular settlements.

In all of the cases listed above, the participation of the community in identifying its needs and means of meeting them can be particularly relevant. When applied together with local planning authorities and service providers, this whole settlement approach may be a more effective way of planning for the future and achieving balanced communities.

4.41 In summary, the main variations in the distribution of new housing development compared to the previous Plan are:

- (a) reduced emphasis on Lowestoft and Stowmarket in accommodating planned new development;
- (b) provision for housing also at Sudbury and Haverhill;
- (c) other towns in addition to Ipswich, Bury St Edmunds, Lowestoft, Stowmarket, Sudbury and Haverhill, along with some larger villages, to accommodate planned new provision primarily to meet the needs of their surrounding areas;
- (d) a reduction in the number of new dwellings to be built in most villages, particularly those without a full range of facilities;
- (e) in all settlements where provision for development is to be made, a stronger emphasis on the take-up of brownfield development opportunities before greenfield sites are released.

Scale of Housing Provision at District Level

4.42 PPG12 requires the Structure Plan to indicate the proposed scale of increase in housing stock in each District over the Plan period.

4.43 In line with the assessment of opportunities for housing development set out in paragraph 4.17, the distribution by Districts is composed of the following elements:

- (a) 95% of existing commitments. This is believed to be a reasonable assumption over a seventeen year period;
- (b) a substantial volume of small windfall and brownfield development (sites less than 0.4 ha or ten units). These estimates are based partly on past experience, and partly on the survey of brownfield development potential undertaken by District Councils as a contribution to the Structure Plan review and the National Land Use Database;
- (c) larger brownfield sites likely to come forward. This District-by-District assessment is based on a study of potential sites within urban

areas and other locations where a sustainable pattern of development could be achieved. Consideration has been given to whether sites identified would be likely to come forward within the Plan period;

- (d) taken together, the contributions from (a), (b) and (c) above fall some way short of the total provision required for the county. The remaining housing will generally be provided on larger greenfield sites allocated through the local plan process. These are distributed to Districts in accordance with the strategy set out in policy CS3 and described in paragraphs 4.19 - 4.41.

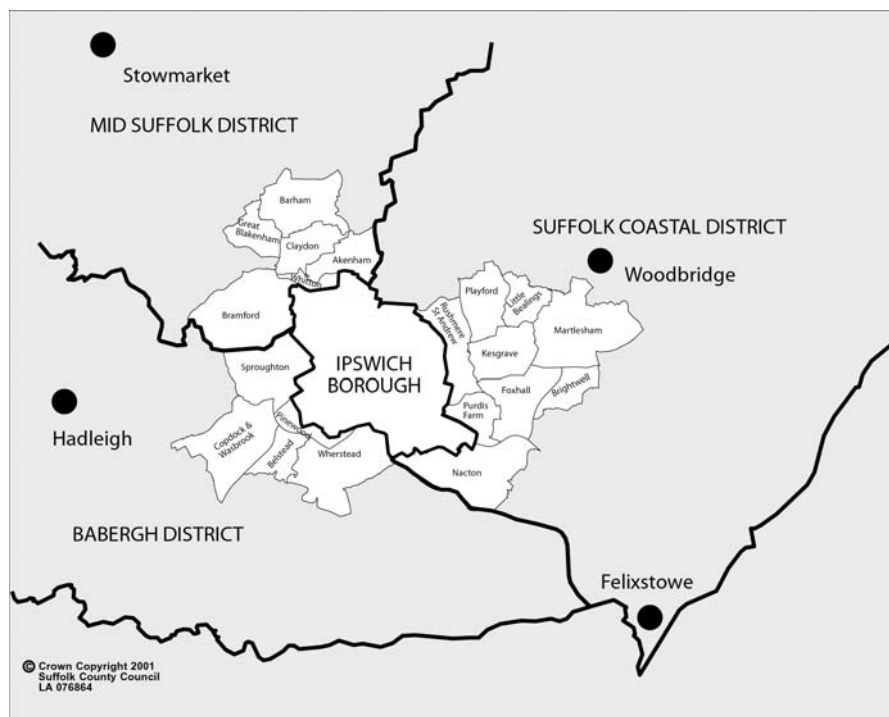
- (b) the need to protect and enhance countryside and other open space land uses that penetrate or abut the urban area, recognising their recreation and general amenity value;
- (c) the need to safeguard best and most versatile agricultural land (defined as grades 1, 2 and 3a);
- (d) the need to avoid coalescence with surrounding villages;
- (e) the need to increase opportunities for the introduction and use of sustainable transport modes, and to maintain or improve access to jobs, services and facilities by ensuring that new housing is well related to them.

4.44 Given its role in the development strategy, a significant proportion of the total additional housing requirement is to be met at Ipswich. As the Ipswich Policy Area covers not only Ipswich Borough but also parts of three other Districts (see Figure 1), further consideration is given within the Structure Plan to the most appropriate locations for further development, in order to provide adequate guidance for individual District local plans. The appraisal of options for development around Ipswich in preparing this Plan took account of a number of principles established in the previous Structure Plan which remain relevant:

- (a) the need to protect and enhance the landscape setting of Ipswich, in particular recognising the value of the Areas of Outstanding Natural Beauty (AONB), Special Landscape Areas (SLA), Sites of Special Scientific Interest (SSSI) and the Gipping, Belstead Brook, Fynn and Mill River Valleys;

4.45 The conclusion arising from this appraisal is that the development of around 1,500 houses within Ipswich Borough immediately to the north of the existing built up area, in the vicinity of Henley Road/Westerfield Road, will most effectively conform with the principles set out above. Infrastructure and services will be required both on and off-site and the provision of some employment in the vicinity would be desirable in order to offer local job opportunities. It is essential that the scale, nature, location and phasing of development are considered in a comprehensive way, to ensure that infrastructure and facilities are provided as required. Proposals for the development should protect the separate identity of the village of Westerfield, in order to meet the requirements of 4.44(d) above.

Figure 1 : Ipswich Policy Area



- 4.46 The proposed distribution of housing provision is specified on an annualised basis in policy CS8. At the time of adoption of this Plan, the contributions thought likely to come from various different categories of housing supply were as set out in Table 1. Small windfall sites, which may include brownfield development, will come forward through the normal operation of the development control process. District Councils should seek to allocate larger brownfield sites as far as possible in local plans. The assumption that a substantial proportion of future growth will be met through windfall development, including the take-up of brownfield opportunities, is consistent with Government thinking as set out in “Planning for the Communities of the Future” and PPG3 “Housing”, and with policy CS7. However the policy deals only with the scale of total change; the component elements referred to above do not form part of the policy, but District Councils will need to consider these assumptions through urban capacity studies prepared as part of local plan reviews, explaining any variation from this breakdown.
- 4.47 Policy CS7 of the county strategy establishes a sequential approach to the identification of new housing allocations to meet housing needs, seeking to maximise the take-up of development potential within built up areas and on brownfield sites either in parallel with or in advance of greenfield land releases. In determining their local plan proposals, District Councils will need to estimate the likely contribution from commitments, small windfall sites and large brownfield sites, before identifying greenfield land releases to make up any shortfall over the local plan period.
- 4.48 On the basis of existing commitments, and the windfall and brownfield development potential assessed, it should be possible to provide for a significant proportion of the overall level of change proposed in the county up to 2016 on brownfield land. However, District Councils will have to judge the extent to which additional greenfield allocations may be required, having first considered what opportunities may exist for brownfield development, and the timescale within which they may be realised.
- 4.49 A substantial proportion of the Ipswich Borough housing provision is expected to arise from redevelopment of large brownfield sites. If monitoring indicates that such sites are not coming forward as anticipated, then the proposed timing and scale of greenfield development may be affected. The review of the Ipswich Borough Local Plan will clarify such implementation issues in the context of the “plan, monitor, manage” approach. Any major variation from the expected scale of brownfield development may require the overall scale and distribution of housing provision within the Ipswich Policy Area in policy CS8 to be reconsidered by way of a Structure Plan Alteration.
- 4.50 Compared to experience since 1981, the strategy implies a lower rate of housing growth up to 2016 in all areas except Ipswich Borough, reflecting the significantly lower county rate. In terms of the share of housing development, that of Ipswich Borough is substantially increased, St.Edmundsbury Borough is slightly increased and the remainder are unchanged or reduced. These changes are generally consistent with the strategic principles being promoted.

Table 1: Composition of Housing Provision 1996-2016 anticipated at time of adoption of Policy CS8 (June 2001)

Local Authority	Housing Provision 1996 – 2016				
	Completions 1996-1999 (1)	Commitments @ 1999 less 5% (2)	Small Windfall/ Brownfield Sites 1999-2016 (3)	Large Sites (10 + units/ > 0.4ha) (4)	Total (1 + 2 + 3 + 4)
Babergh	1,020	3,160	1,530	1,190	6,900
Forest Heath	460	2,610	1,450	680	5,200
Ipswich	250	2,150	940	4,610	8,000
Mid Suffolk	1,550	2,740	2,210	1,600	8,100
St Edmundsbury	1,580	2,950	1,110	3,110	8,800
Suffolk Coastal	1,840	4,560	2,380	620	9,400
Waveney	930	3,440	1,700	630	6,700
SUFFOLK	7,630	21,610	11,320	12,440	53,000
IPSWICH POLICY AREA	1,700	5,040	1,450	4,810	13,100
(of which)					
Babergh (part)	180	710	170	0	1,100
Ipswich	250	2,160	940	4,610	8,000
Mid Suffolk (part)	240	170	170	200	800
Suffolk Coastal (part)	1,030	2,000	170	0	3,200

- (a) Totals may not sum due to rounding.
- (b) The numbers of commitments and windfalls expected to be implemented, shown in columns 2 and 3, will be reassessed by Borough and District Councils in the course of local plan preparation. They will review outstanding residential permissions outside the towns listed in policy CS3(b) and (c), which do not relate to land previously allocated for housing in local plans, and estimate how many dwellings are covered by permissions which are unlikely to be renewed. In preparing local plans, that number of dwellings, together with any expected shortfall in the incidence of windfalls, will be treated as part of the total to be provided for on large sites (column 4 of the table). Careful monitoring of the contributions made by the various components of housing supply will be required.
- (c) 'Large site' provision may include windfall, allocated brownfield and allocated greenfield development. The survey referred to in paragraph 4.43(b) suggests that a significant proportion of the development specified in column (4) could be achieved through allocation of previously developed sites. This potential will be investigated further in local plan reviews. The location of any greenfield allocations should be determined in accordance with the locational strategy in policy CS3.
- (d) Ipswich Policy Area figures are included in District and Suffolk figures above.