Gladman

Matter 1 Hearing Statement
Procedural/legal requirements

East Suffolk Council
Examination of the Suffolk Coastal Local Plan
Issue: Whether all Statutory and Regulatory requirements have been met?

**Duty to Cooperate**

1.1  *Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the Planning and Compulsory Purchase Act 2004, as amended [the 2004 Act]?*

1.1.1  Gladman recognise that collaborative work has been undertaken between the Council and its neighbouring authorities. It is noted that evidence has been produced by the Council which provides information on the engagement that has taken place through the Ipswich Strategic Planning Area Board during the plan making process and to explain how this will be continued into the future. A series of ‘memorandums of understanding’ and ‘statements of common ground’ have been published during the course of the plan’s preparation.

1.1.2  The most recent set out outcomes and agreements between the respective local authorities is provided through the following submission documents:

- Duty to Cooperate Statement, January 2019 and updated March 2019 (Submission Document A12)
- Ipswich Strategic Planning Area Statement of Common Ground, March 2019 (Submission Document A13)

1.1.3  It is vital that this process of engagement through the plan preparation process results in coordinated and effective outcomes across each of the local plans that are brought forward and adopted within the area. This will ensure that they, when read together, fully address the strategic matters that have been identified.

1.1.4  Paragraphs 25 and 26 of the Framework state that:

   **25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans...**
26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

1.1.5 This element of national policy is pertinent to the production of local plans across the area that is covered by the Ipswich Strategic Planning Board because they embrace shared growth and infrastructure delivery ambitions and priorities for the ‘Wider Strategic Planning Area’. Having identified shared strategic matters, there is a need to address these through individual local plans. It therefore follows that strategic priorities must be fully embraced and supported through the spatial strategies of the local plans that are brought forward by the individual authorities and through the associated decision-making processes that inform the plan’s preferred spatial development options. In its current form, the SCLP fails to achieve this because it does not form a strategy that will:

i. **assist the delivery of the strategic infrastructure priorities of the wider area**

- Gladman are concerned about the manner in which the wider than local strategic infrastructure requirements and cross boundary mitigation measures have been reflected through the development of the proposed Suffolk Coastal Spatial Strategy and associated policies that has been proposed. Section B2 or v4 of the SoCG (submission document A13) states:

  “B2 - The emerging Local Plans incorporate policies which consider strategic matters related to housing and employment growth, infrastructure provision and mitigation of impacts on European protected sites”

- Whilst the SCLP identifies shared priorities through policies SCLP2.1 and SCLP2.2 and SCLP 2.3, it fails to have full regard to these within the spatial strategy and policies that have been established for Suffolk Coastal. The priorities that are established within the Ipswich Planning Area policies ought to be central in establishing the strategy for Suffolk Coastal, as this would provide a positive response towards securing the delivery of these priorities within the plan period. This is a matter that should be addressed through modifications to the spatial strategy of the SCLP (and any associated policies where required) in order to demonstrate that constructive engagement has been achieved through the Duty to
Cooperate. Indeed, the SA Final Report sets out at Page 123 that the preferred option for Policy SCLP2.2 “… enables the role of the Suffolk Coastal Local Plan to be clearly articulated in relation to the wider Ipswich Strategic Planning Area.” In turn, the implementation of the infrastructure priorities that are set out within Policy SCLP2.2 should be central in the process of establishing the spatial strategy and policies for Suffolk Coastal in order to ensure that the policies of the plan as a whole will assist in securing their delivery.

ii. provide the necessary certainty that is needed to ensure that the minimum housing requirement across the Ipswich Housing Market Area can be achieved in full over the plan period.

• From the earliest stages of the plan making process, the local authorities within the ISPA have been aware of the issue relating to the unmet housing needs that will arise from Ipswich over the plan period. Indeed, the consideration of this issue is clearly expressed through the policies of the adopted Ipswich Local Plan (see Appendix 1). This issue is also highlighted in the Inspector’s Report on the Examination of the Ipswich Local Plan, dated January 2017 (see extract at Appendix 2).

• The issue of unmet need was acknowledged in Suffolk Coastal and Ipswich at the Issues and Options Stage of plan making in August 2017 and an intention to align or prepare joint plans was set at that early stage of plan production, reflecting the requirements set out in Policy CS6 of the adopted Ipswich Local Plan. This intention was welcomed by Gladman in our response to the Issues and Options consultation, as it would provide an opportunity to bottom-out this issue through the plan making process through the re-distribution of housing needs in the manner set out in the NPPF and PPG. Indeed, national policy and the associated guidance has been updated during the plan preparation process and the 2019 Framework now makes it clear at paragraphs 60 and 65 that any needs that cannot be met within neighbouring areas should also be taken into account in establishing a plan’s housing requirement figure. This should certainly have been grappled with through the joint/aligned process of bringing forward plans within the ISPA, as any failure to do so will frustrate and cause unnecessary delays to meeting the housing needs of the area in full and in significantly boosting the supply of homes in line with the requirements of paragraph 59 of the Framework.
• It is unfortunate that the timescales for the production of the Ipswich Local Plan have fallen behind that of the Suffolk Coastal Local Plan\(^1\), meaning that the issue of unmet housing needs arising in Ipswich has yet to be the subject of the scrutiny of a Local Plan Examination. The need to address this issue goes to the heart of the soundness of the Suffolk Coastal Local Plan, as there are practical and sustainable options available now to the East of Ipswich that can accommodate such needs over the plan period in a sustainable manner, which can support wider infrastructure priorities whilst complementing (and importantly not prejudicing) the proposed route options for the Ipswich Northern Relief Road that are currently out for public consultation\(^2\) (see Appendix 3).

• Paragraph 35 of the Framework indicates that to be positively prepared, a plan must provide a strategy “…which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development…”

• There can be no certainty that Ipswich Borough’s development needs can be wholly met within its tightly bounded area over the plan period. It therefore follows that measures are required within neighbouring local plans within the ISPA and agreed through the Duty to Cooperate to ensure that the extent of those unmet needs can be met elsewhere over the course of the plan period. Indeed, significant concerns have been raised in relation to the emerging Ipswich Local Plan with regards to its ability to meet housing needs in full over the proposed plan period, however this remains at an early stage of production as the timetables have not been aligned in the manner that had initially been anticipated by the ISPA authorities.

• The unmet housing needs issue is something that the ISPA authorities are conscious of. Indeed, section C3 on page 10 of v4 of the SoCG states\(^3\) “Where the need cannot be met within the local authority’s boundary, following a comprehensive re-assessment of deliverability, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the

\(^1\) A draft version of the Ipswich Local Plan was the subject of consultation in xxxx 20xx and has yet to reach the Regulation 19 Stage.

\(^2\) The current Ipswich Northern Route Consultation runs from Friday 5 July 2019 until Friday 13 September (https://ipswichnorthernroute.org.uk/).
Despite this recognition, as submitted, the SCLP fails to satisfactorily grapple with the very real prospect that the development needs of Ipswich cannot be wholly met within its tightly drawn administrative boundaries over the course of the plan period. This is a matter that will need to be addressed through modifications to the SCLP in order to demonstrate that constructive engagement has been achieved through the Duty to Cooperate.

1.6 The concerns raised by Gladman in relation to the Duty to Cooperate are discussed further in response to the questions relating to the robustness of the SCLP’s Sustainability Appraisal process and Matter 2: The Suffolk Coastal Spatial Strategy. In particular, our Matter 2 Statement discusses the need for main modifications to the Local Plan to ensure that the housing and infrastructure needs of the wider area can be achieved over the plan period.

Sustainability Appraisal

1.2 Is the Sustainability Appraisal (SA) adequate?

1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?

1.4 Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

1.4.1 The following response relates to Questions 1.2, 1.3 and 1.4.

1.4.2 The Sustainability Appraisal is not considered to be adequate in its current form, specifically:

i. The SA fails to adequately take the delivery of infrastructure priorities that have been set for the wider strategic planning area into account within its consideration of options for the preferred locations for growth and distribution of growth in Suffolk Coastal. In this context, insufficient reasoning has been provided for the rejection of the reasonable alternatives within the summary table relating to Policy SCLP3.1 on pages 124 and 125; and, through the consideration of the options against the SA objectives on pages 651 to 673 of the Final Draft Local Plan Sustainability Appraisal December 2018.

ii. The Plan and SA has failed to consider mechanisms to provide for the unmet needs of neighbouring authorities (which could be addressed through amendments to the
spatial strategy to recognise the likely need for additional development in locations that relate to Ipswich over the course of the plan period and through modifications to SCLP 2.1 and SCLP 3.1).

iii. The SA fails to adequately consider the relative sustainability credentials associated with planning for greater levels of growth (i.e. focussing growth in locations and of a scale that can support the delivery of strategic infrastructure requirements that have been identified within the Plan, having identified them through collaborative working with neighbouring authorities and included them in Policy SCLP2.2)

iv. The Plan and SA has failed to provide sound and justified reasons for the rejection of proposals submitted to the Council to the East of Ipswich such as the Orwell Green Garden Village (Site 485), despite the Plan identifying locations for growth post 2031 in locations relating to Ipswich (i.e. at Land North East of Humber Doucy Lane).

1.4.3 The alternative options for the amount and location of growth and the reasons for rejecting them are set out on pages 124 and 125 of the Final SA Report. This explains that the East of Ipswich option has been rejected on the basis that it will be considered through a local plan review, as set out on Page 125 of the SA:

“However, the Plan states that it is likely that a review of the Plan will consider options for the Ipswich Northern Route and this would be [the] appropriate time to consider additional growth in this area. In the meantime, the focus would be on the delivery of Brightwell Lakes.

1.4.4 However, it would not be inappropriate at this time to consider options for additional growth in the area to the East of Ipswich. Sustainable options exist, such as site 485, which will not prejudice any of the options that have been proposed for the ‘Ipswich Northern Route’ and that can support the wider than local strategic infrastructure requirements of the plan. Furthermore, no formal commitment is made within the policies of the plan or the monitoring framework to ensure a local plan review is brought forward to address this important issue.

1.4.5 The reasons for rejecting alternative site 485 are summarised on page 175 of the SA, which sets out the following:

485 Land North & South of Bucklesham Road, IP10 0AG

143.57ha (Mixed Use) - Whilst the site is identified as potentially suitable in the SHELAA, Foxhall is identified as in the countryside in the settlement hierarchy. The Local Plan Strategy avoids allocating development in the countryside. Development would be of a scale contrary to the strategy of the plan. Options in relation to the strategy of the Plan area considered under the assessment of alternative policy options.
1.46 The summary text indicates that the site has been rejected on spatial strategy grounds. It also refers to its location in the countryside, which would be the case for many of the proposed allocations, including the proposed garden village sites. In addition, the commentary indicates that the site’s location in Foxhall results in it being identified as being in the countryside in the settlement hierarchy. However, any reasoned judgement would recognise that it is located to the immediate east of Ipswich and is therefore situated in a location at the top of the Suffolk Coastal settlement hierarchy, it is therefore not considered appropriate to reject the site on the basis that the local plan strategy avoids allocating development in the countryside. Whilst it is noted that the summary also indicates that the proposal would be of a scale that is contrary to the strategy of the plan, Gladman have also raised concerns that the options that have been considered for the growth strategy have not been assessed in a manner that is consistent with national policy and do not positively respond to the strategic infrastructure requirements that have been set through collaboration with neighbouring authorities.

1.47 The positive consideration of sites to the East of Ipswich would also provide a rapid response towards addressing the unmet needs of Ipswich (the extent of which remains unknown at this stage).
Appendix 1 - Extract from Ipswich Local Plan, adopted 2017
POLICY CS6:
The Ipswich Policy Area

8.64 Ipswich has relatively tight administrative boundaries and clearly there are cross boundary issues that are relevant to the development and future of the Borough, the urban area of Ipswich and surrounding areas.

8.65 This has long been recognised within the former Suffolk Structure Plan via the identification of the ‘Ipswich Policy Area’. The Ipswich Policy Area consists of parts of the areas of Suffolk County Council, Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council and the whole of Ipswich Borough’s area, and the Ipswich Policy Area Board consists of councillors and is a key vehicle for cross boundary planning. The boundary of the Ipswich Policy Area is mapped at Appendix 3 for information. The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans. The Ipswich Policy Area sits within the wider Ipswich Housing Market Area and Ipswich Functional Economic Area, both of which cover the whole of the four planning authority areas.

8.66 In planning strategically for housing, employment and infrastructure provision, the Council will need to continue to work closely with neighbouring local authorities to ensure a coordinated approach in line with the Duty to co-operate.

POLICY CS6: THE IPSWICH POLICY AREA

Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich. It will achieve this in a variety of ways:

a. Joint working on Local Plan evidence gathering, monitoring and updating, to ensure a consistent approach;

b. The production of joint or aligned local plans; and

c. Joint working to develop shared approaches to delivery, such as that for strategic green infrastructure and strategic development sites.

The preparation of joint or aligned development plan documents is to be explored, to ensure a coordinated approach to meeting the objectively assessed housing needs of the Ipswich housing market area and achieving economic growth.

8.67 The Council recognises the importance of joint working on Ipswich Policy Area matters. Previously this has been achieved through joint working on evidence base documents to inform development plan documents. However, in order to address the constraints to meeting development needs in Ipswich Borough, due to the constrained nature of the boundary, there is a need to work on joint or aligned local plans with neighbouring authorities. Work is to commence on Issues and Options in 2016 with the aim of having the plans adopted by 2019. The preparation of joint or aligned development plan documents will ensure a coordinated approach to meeting the objectively assessed housing needs of the Ipswich housing market area and achieving economic growth.

8.68 The Borough Council will continue to comment on key strategic planning applications in neighbouring authorities and their respective Local Plan documents. Neighbouring authorities, including parish councils, will have the opportunity to comment at all stages of the production of the Ipswich Local Plan.

8.69 Ipswich Policy Area Board involves councillors and officers from the Borough Council, the neighbouring authorities (Suffolk Coastal, Mid Suffolk and Babergh) and the County Council to focus on and discuss development issues. More details on this are provided within Chapter 10.
8.70 The strategic planning of new homes is a key part of the Local Plan. This section addresses the strategic issues associated with delivering new homes.

8.71 It is divided into the following six policies:

POLICY CS7: The Amount of New Housing Required

POLICY CS8 Housing Type and Tenure

POLICY CS9 (policy deleted)

POLICY CS10 Ipswich Garden Suburb (formerly Ipswich Northern Fringe)

POLICY CS11 Gypsy and Traveller Accommodation

POLICY CS12 Affordable Housing

8.72 These are addressed in turn below:

POLICY CS7: The Amount of Housing Required

8.73 The Council previously had an adopted target to allocate land to accommodate at least 14,000 additional residential dwellings between 2001 and 2021 (at 700 dwellings per annum) and a further 700 dwellings per annum thereafter to 2027. This plan covers the period 2011 to 2031 and the Council has identified an interim housing requirement of at least 9,777 dwellings (at 489 dwellings per annum) based upon the anticipated housing supply within the Borough. However, taking account of household forecasts, up to date evidence on market signals, the need for affordable housing and increased future migration from London, the Objectively Assessed Need for new housing in Ipswich could be substantially more. It is recognised there is an urgent need to work with neighbouring authorities to produce an up to date Objectively Assessed Need for the Housing Market Area and joint or aligned plans to deliver it.

8.74 However, capacity constraints in the Borough mean that, currently, sufficient suitable, deliverable and available land to deliver significantly more than 9,777 dwellings cannot be met within the Council’s administrative area. In these circumstances, rather than delay adoption of this plan whilst an updated Objectively Assessed Need for housing within the Ipswich Housing Market Area is identified, this additional work will be undertaken post-adoption as part of the production of joint or aligned local plans or a new strategic plan. Joint working is taking place through the production of joint or aligned local plans being prepared by Ipswich Borough Council, Babergh/Mid Suffolk District Councils and Suffolk Coastal District Council, to conclude by 2019. Publication (under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) of the plan(s) in 2018 aligns with the timescales set out in the Council’s Local Development Scheme. This joint working has the support of the Ipswich Policy Area Board and a Memorandum of Understanding was signed in May/June 2016 by the local planning authorities and Suffolk County Council. Alternative potential mechanisms are also emerging. Work has begun on a Suffolk-wide Strategic Planning and Infrastructure Framework, which is at an early stage. The Government’s announcement on 16th March 2016 included the devolution of strategic planning...
powers to an East Anglia Combined Authority, which would represent a further alternative mechanism for strategic planning.

8.75 Table 2 below sets out the housing land supply and minimum requirement figures as at April 2015, looking forward to 2031.
TABLE 2 HOUSING LAND SUPPLY AND MINIMUM REQUIREMENT AT APRIL 2015

<table>
<thead>
<tr>
<th></th>
<th>Number of dwellings</th>
<th>Discounted Numbers</th>
<th>Cumulative Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Dwellings completed between 2011 and 2015</td>
<td>1,081*</td>
<td>-</td>
</tr>
<tr>
<td>2</td>
<td>Dwellings under construction</td>
<td>705</td>
<td>-</td>
</tr>
<tr>
<td>3</td>
<td>Dwellings with planning permission</td>
<td>914</td>
<td>823</td>
</tr>
<tr>
<td>4</td>
<td>Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)</td>
<td>916</td>
<td>824</td>
</tr>
<tr>
<td>5</td>
<td>Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2031</td>
<td>6,344</td>
<td>-</td>
</tr>
</tbody>
</table>

TABLE NOTES

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

Line 1: Actual numbers of dwellings built between 1st April 2011 and 31st March 2015.*Includes 124 Assisted Living dwellings.

Line 2: Dwellings under construction at 31st March 2015 - assumed that all will be completed over the plan period.

Line 3: Other dwellings with planning permission at 31st March 2015 - assumed that 10% of these will not be completed.

Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued; at 31st March 2015 - assumed that 10% of these will not be completed.

Line 5: To reach the interim minimum requirement of 9,777 dwellings by 2031, together with windfall sites, further land will need to be allocated within the Borough for at least 6,344 new homes.
National guidance in the National Planning Policy Framework is that Local Planning Authorities should set out their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of the relevant development plan document.

This should include identifying a specific supply of developable sites for years 1-10 from adoption and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. In the case of Ipswich this will be within the Borough boundary at this stage but continuing discussions are required with neighbouring authorities within the Ipswich Housing Market Area due to capacity constraints. Windfall sites will also contribute to the housing supply and these are defined in the National Planning Policy Framework as sites not specifically identified as available in the Local Plan process and normally comprise previously-developed sites that have unexpectedly become available.

POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED

a. The Council has an interim housing target of at least 9,777 dwellings for the period 2011 – 2031. This equates to an interim annual target of at least 489 dwellings. The Council will, with its neighbours, prepare an updated Objectively Assessed Need for the Ipswich Housing Market Area and draft strategy options for the distribution of development to meet that need in the Ipswich Housing Market Area by spring 2017. The results of the joint working will take the form of a joint or aligned local plan review, supported by the production of a Suffolk-wide planning framework. Policy CS7 will be reviewed as part of this joint working.

b. Due to the constrained nature of the Borough, it is currently anticipated that not significantly more than 9,777 dwellings (489 dwellings per annum) can be delivered to 2031. Based upon this capacity, the Council will secure the delivery of housing of at least 489 dwellings per year within the Borough. Since the start of the plan period 3,433 dwellings have been completed, are under construction, have planning permission or have a resolution to grant planning permission subject to a s106 agreement.

The Council will additionally allocate land to provide for at least 5,344 dwellings (net) in the Borough, with a lower amount of 4,544 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. Sites are identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb. 1,800 dwellings are expected to be delivered on windfall sites between 2016 and 2031.

c. The Council is currently unable to demonstrate a five year supply against the interim housing target of at least 9,777 dwellings, in terms of paragraph 47 of the National Planning Policy Framework. In the absence of a five year supply of housing within the Borough, the Council will adopt a positive approach to appropriate new housing developments which may come forward on sites not allocated for housing in accordance with policies DM25 and DM34. Nonetheless policies that ensure well-designed dwellings which provide good living conditions for their residents remain important and will remain relevant to determining what is an appropriate housing development.

Due to the constrained nature of the Borough boundary, the Council is actively working with neighbouring authorities to produce an updated Objectively Assessed Need for the Ipswich Housing Market Area and joint or aligned Local Plans to deliver it.
8.79 Within the Borough, sites are allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, having regard to the strategy set out within this document and in CS10. The Council has undertaken an update to the 2010 Strategic Housing Land Availability Assessment (SHLAA) and is satisfied that sites within the Borough are capable of being delivered. The SHLAA will be periodically updated.

8.80 The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans. The SHLAA informs the Council’s housing trajectory. It is based on recent contact with developers and landowners. It is from this potential supply that site allocations are drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited, hence the need to consider future development opportunities beyond the Borough boundaries. Table 3 below provides a breakdown of the housing land supply whilst Table 4 provides a breakdown by delivery period. Delivery will be monitored closely through the Council's Authority Monitoring Report.

8.81 In working with neighbouring authorities to address housing need, consideration will need to be given to avoiding or minimising effects in these areas including environmental designations, landscape, townscape and historic assets. This policy supports plan objective 3.

Unmet Housing Needs

30. Notwithstanding the proposed modifications to policies CS6 and CS7 representations have suggested that the plans are insufficiently clear about where and when the likely unmet housing needs will be provided for or the arrangements for determining this. Moreover, it has been argued that, to be sound, the current plans should resolve this matter rather than leave it for a plan review or subsequent DPDs.

31. However, the submitted plans (or any other plans for Ipswich alone) cannot make binding requirements on other authorities to allocate sites for housing in their areas. Ideally the aligned/joint plans which the authorities are working towards producing to address needs across the Ipswich HMA would be in place now, but they are not. Furthermore, aside from the issue of unmet housing need, and whilst I note some Examination participants suggested otherwise, I see there being considerable benefit in getting the submitted plans (subject to necessary modifications) adopted as soon as possible in order to ensure that high quality development to meet the town’s needs comes forward as soon as possible.

32. Fundamentally, given the circumstances which the Ipswich Policy Area authorities currently find themselves in, there would be much to gain from the adoption of the submitted plans (subject to necessary modifications) as soon as possible. At the same time there would be likely to be little to lose in terms of getting firm proposals in place to address potential unmet housing needs. Consequently, adoption of the plans modified to require review to determine and deliver housing needs across the HMA for the long term, is thus soundly based. This conclusion is consistent with my April 2016 Interim Findings and nothing since then justifies the adoption of a different approach.
Appendix 3 – Options for the Ipswich Northern Route