Suffolk Coastal Local Plan Examination

Note on proposed modifications to SCLP2.1 regarding local housing need

1. This note responds to the Inspector’s post hearings letter dated 31st January 2020 and also the Inspector’s comments within the first review of the table of modifications that has been prepared by the Council to identify amendments to the plan.

2. Following the hearing session on Tuesday 20th August on Matter 2A Housing Provision the Council submitted a note to the Inspector proposing modifications to Policy SCLP2.1 Growth in the Ipswich Strategic Planning Area to provide a local plan review mechanism in the event that another authority in the Ipswich Strategic Planning Area cannot meet its housing need (Note on Review Mechanisms and Housing Need, Document I16). That note proposed the following modifications:

Additional text at the end of paragraph 2.8 (note also a typographical error was included in Document I16 which has been removed):

“The housing need figures for the authorities in the ISPA are shown in Table 2.1. The starting point for each authority will be to meet their own housing needs within their own boundary. Reflecting the agreed outcomes in the ISPA Statement of Common Ground (March 2019), where through the plan making process an authority is unable to meet its own housing need, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how need can be met within the ISPA. Where this would necessitate considering spatial and policy options to plan for further growth above that planned for within this Local Plan, a review of the Local Plan would be necessary.”

Additional text at the end of the last paragraph of Policy SCLP2.1:

“The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary. Where through the plan making process it is demonstrated that another authority is unable to meet its minimum housing need, and where as a result it is necessary to plan for growth above that planned for through this Local Plan, the Council will undertake a review of the Plan.”

Appendix A Monitoring Framework, row related to SCLP2.1 (Page 414):

Additional text in the ‘Risks’ column: “Any ISPA authority declaring that they are unable to meet their minimum housing need”
Additional text in the ‘Mitigation/contingencies column’: “Following a comprehensive re-assessment of deliverability, ISPA Board to collectively consider how unmet need can be met across the ISPA. Depending on the scale of any unmet need, this may act as a trigger for a review of the Local Plan.”

3. The Inspector’s post hearings letter states that Policy SCLP2.1 should be amended to include that an immediate review of the Plan or relevant strategic policies would be triggered at the point where it is established through the adoption of a development plan that there is unmet need arising in a neighbouring authority area in the HMA.

4. The Council has considered wording proposed by the Inspector in the table of modifications and would wish to refer to a number of practical matters associated with the proposed text.

5. The agreed position in the ISPA Statement of Common Ground, last updated in October 2019 and signed in January 2020 (see Note on Ipswich Strategic Planning Area Statement of Common Ground, Document J29) reflects careful consideration of potential scenarios within which the issue of unmet housing need may become a matter to be addressed within the ISPA.

6. The Council would be concerned should the policy commit the Council to only embarking on a review at the point of adoption of another Local Plan identifying unmet need. The ISPA authorities have been mindful to ensure that there is a commitment in place to address any unmet need as part of the plan making process, in accordance with the Duty to Co-operate. In this respect, it is anticipated by the ISPA authorities that any necessary review of plans within the ISPA could be triggered at a point prior to the adoption of a Local Plan within which the housing need cannot be met. This will enable proper consideration of spatial and policy options to meet that need and a commitment to addressing unmet need to be demonstrated at the point of Local Plan Examination. Under the Duty to Co-operate regular collaboration and engagement takes place between the authorities which provides a sound basis for the approach agreed through the Statement of Common Ground.

7. In relation to the timescale for a review, the modifications proposed by the Council in Document I16 acknowledge that there may be instances where another authority cannot meet its housing need but where this would not necessarily result in the need for an immediate review of the Local Plan. One such scenario may be that need can be met in the short term but that Local Plan reviews would need to address unmet need in the longer term. Further, it is considered that the term ‘commenced’ could be interpreted in a number of ways. Should unmet need trigger a review of local plans it is considered appropriate for the relevant authorities to examine the potential options for the nature of that review, and three months is considered to be a challenging timescale within which to do this. The Council would therefore consider it preferable to incorporate the phrase ‘without delay’, reflecting the Inspector’s letter in a manner which allows for the important pre-production elements of plan preparation to be properly addressed. The Council also proposed to incorporate further supporting text to explain what this would mean within the context of Local Plan production.
8. The geography to be covered through the next review of Local Plans in East Suffolk (noting that the northern part of the local planning authority’s area is covered by the adopted Waveney Local Plan) would need to be determined at the outset of a review of the Plans, and it is not assumed that a future Local Plan would cover the same area as the Suffolk Coastal Local Plan. The determination of an appropriate geography for a future Local Plan review would include consideration of strategic cross boundary issues and up to date evidence at the time. The wording proposed by the Council is considered to provide this flexibility.

9. The modifications proposed in Document I16 remain consistent with the recently updated and signed ISPA Statement of Common Ground (as contained in the council’s Note on Ipswich Strategic Planning Area Statement of Common Ground, Document J29).

10. To provide further flexibility in relation to the point at which and the mechanism by which unmet need may be determined, the Council would propose the following alternative modifications.

11. Modifications are shown in strikethrough for deleted text and in underline for additional text. The Council will include these revisions in the schedule of modifications that has been collated as part of the Examination.

Alternative modification to Policy SCLP2.1:

“The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary. Where through the production or adoption of a Local Plan it is determined that another authority is unable to meet its minimum housing need, and where as a result it is necessary to plan for growth above that planned for through this Local Plan, the Council will without delay commence a review of the Local Plan or the strategic housing policies.”

Additional text at the end of paragraph 2.8 (further modification shown in grey shading):

“The housing need figures for the authorities in the ISPA are shown in Table 2.1. The starting point for each authority will be to meet their own housing needs within their own boundary. Reflecting the agreed outcomes in the ISPA Statement of Common Ground (March 2019), where through the plan making process an authority is unable to meet its own housing need, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how need can be met within the ISPA. Where this would necessitate considering spatial and policy options to plan for further growth above that planned for within this Local Plan, a review of the Local Plan would be necessary. Policy SCLP2.1 refers to without delay commencing a review of the Local Plan or the strategic housing policies. In the context of the production of a Local Plan, the commencement of a review is likely to initially entail a review of the Local Development Scheme, consideration of strategic cross boundary issues and the production and consideration of an updated evidence base.”