Suffolk Coastal Local Plan Examination

Hearing Day 1

Matter 2A Housing Provision

Note on potential Local Plan review mechanisms related to any potential future unmet housing need in the Ipswich Strategic Planning Area

1. This note responds to a request from the Inspector during the hearing session on Matter 2A Housing Provision (Tuesday 20th August, PM) to consider potential Local Plan review mechanisms related to any potential future unmet housing need in the Ipswich Strategic Planning Area.

2. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Document C5) requires a local plan review to be completed every five years (starting with the date of adoption).

3. Paragraph 33 of the National Planning Policy Framework (Document C1, page 11) states “Policies in Local Plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

4. Through the hearing session covering Matter 2A Housing Provision the Inspector has asked the Council to consider whether the Local Plan should include any mechanisms that would trigger a review (other than that required under the Regulations referred to above) in relation to an authority within the ISPA being unable to meet its minimum housing need.

5. Policy SCLP2.1 of the Final Draft Local Plan (Document A1, page 18) sets out the approach to growth in the Ipswich Strategic Planning Area (which covers the area of the former Suffolk Coastal District, along with Babergh District, Mid Suffolk District and Ipswich Borough). This states that the Suffolk Coastal Local Plan will contribute to the provision of “the collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area” and that “The Council will work actively with the other local planning authorities in the ISPA and Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.”
6. The figure of 37,328 relates to housing need as calculated using the 2016-based household projections and the 2017 ratios of median house prices to median workplace-based earnings published in April 2018. The Council’s Matter 2A Statement (Question 2.4, page 12 and pages 25-26) proposes a modification to replace this figure with 35,334 to reflect the housing figures as calculated under the Planning Practice Guidance published in February 2019 using the 2014-based household projections and the 2018 affordability ratio published in March 2019. The minimum housing need figures for each of the ISPA authorities is set out on page 4 of the Council’s Matter 2A hearing statement (Question 2.1).

7. The ISPA Statement of Common Ground (Document A13) states that:

“Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. 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 ISPA, subsequently to be determined through each local authority’s local plan.” (Outcome C3, page 10).

8. The ISPA Statement of Common Ground states further, in relation to mechanisms for ongoing working, that:

“Land Supply:

Throughout the plan-making process, where comprehensive deliverability assessments demonstrate that the housing need cannot be met within the local authority’s boundary the ISPA Board will provide the forum to collectively consider how the unmet need can be met.

Housing delivery:

As per paragraph 75 of the 2019 NPPF, Housing Action Plans will provide a mechanism for identifying actions to increase delivery where delivery falls below 95% of an authority’s housing requirement (calculated over the previous three years). Each individual local authority may produce Housing Action Plans if required to do so by Government. The ISPA Board can then consider any common or cross-boundary themes between two or more authorities.” (page 11)

9. The Council is aware that a number of representations submitted to the Final Draft Local Plan raise issues over the ability for the housing need for Ipswich to be met within the Borough. As stated in the Council’s Matter 2A statement (Question 2.1, page 3), throughout the plan making process neighbouring authorities have not requested that the Suffolk Coastal Local Plan provides any dwellings to meet any unmet need. This issue was raised further through the hearings session on Matter 2A, and the Inspector has asked the Council to consider the potential for incorporating a review mechanism into the Local Plan in order that any situation of unmet need arising through the
production of other Local Plans in the Ipswich Housing Market Area could be considered through Local Plan reviews.

10. The following factors are considered relevant in the consideration of a review mechanism:

- The ISPA is considered to be a relevant geography as identified through the Strategic Housing Market Assessment (Document D14), for the consideration of collectively meeting housing need (as set out on page 2 of the ISPA Statement of Common Ground, Document A13);

- The ISPA Statement of Common Ground contains mechanisms to ensure that an authority with unmet need has undertaken a comprehensive reassessment of deliverability prior to the Board providing a forum to consider how the unmet need can be met within the ISPA;

- The Government, through the introduction of the Housing Delivery Test and housing action plans (paragraph 75 of the NPPF, Document C1), is placing increased emphasis on authorities putting actions in place to support delivery, and the ISPA authorities recognise this through the arrangements for necessary ongoing co-operation set out on page 11 of Document A13.

11. The Policy Delivery Framework in Appendix A of the Final Draft Local Plan (Document D1, page 414) identifies that where housing delivery does not come forward as anticipated under Policy SCLP2.1, a review of Local Plans across the ISPA would form appropriate mitigation.

12. However, the Council acknowledges that this relates to the delivery of plans, rather than to the production of plans, and that the Local Plan at present does not set out a relationship between another authority in the ISPA being unable to meet its housing need at the plan making stage and the potential need for meeting this to be considered through the production and review of Local Plans in the ISPA. Whilst the matter of meeting minimum housing needs across the ISPA would undoubtedly form a consideration in determining whether a review is necessary under the requirement to review the Plan every five years, and the production of Local Plans across the ISPA has been aligned as far as possible, inevitably as the Plans will be Examined and adopted at different points the Council should acknowledge the possibility of unmet need arising as an issue during the latter phases of the production of other plans.

13. Reflecting the agreements in the Statement of Common Ground, the Council would therefore support the following modifications (additional text shown in underline):

Additional text at the end of paragraph 2.8:

“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. 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.”