



STRATEGIC PLANNING COMMITTEE

Monday, 9 March 2020

PLANNING POLICY AND DELIVERY UPDATE

EXECUTIVE SUMMARY

This report provides an update on the emerging Suffolk Coastal Local Plan and the recently published results of the Housing Delivery Test.

Is the report Open or Exempt?	Open
Wards Affected:	All
Cabinet Member:	Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management
Supporting Officer:	Desi Reed Planning Policy and Delivery Manager 01502 523055 desi.reed@eastssuffolk.gov.uk

1 INTRODUCTION

- 1.1 This report provides a brief update on the emerging Suffolk Coastal Local Plan, having now received the Inspector's post hearings letter and the recently published results for the Housing Delivery Test.

2 LOCAL PLAN FOR THE FORMER SUFFOLK COASTAL AREA

- 2.1 As Councillors will be aware, the Local Plan for the former Suffolk Coastal area is well progressed and was submitted to the Secretary of State, for Examination by the Planning Inspectorate, on 29th March 2019. Inspector Philip Lewis BA (Hons) MA MRTPI was appointed to conduct the Examination to determine whether the Local Plan is sound.
- 2.2 The public Hearing stage of the Examination took place between Tuesday 20th August and Friday 20th September. During the hearings the Inspector requested written clarifications, further information and re-wording of policies and text for his consideration. All these requests were fulfilled and submitted to the Inspector in November 2019 and published on the East Suffolk Local Plan Examination website page.
- 2.3 The Inspector also identified matters during the hearings that he wanted to take away and consider further after the hearings, before writing to the Council on how he wished to take the Examination forward. There has been some unanticipated delay in receiving a written response from the Inspector, partly due to purdah for the general election, but the Council has now received the 'Inspector's post hearings letter', on February 10th ([letter available on the Examination page of the East Suffolk website](#)). Also attached as Appendix A to this Report.
- 2.4 The Inspector's post hearing letter clarifies that the purpose of the letter is to set out his thoughts on the Local Plan at this stage and the way forward for the Examination and that his comments are based on all he has read, heard and seen to date, including the Inspector led consultations conducted after the hearings. He emphasises that the examination is not yet concluded, consultation on main modifications is still to take place and, therefore, his comments are without prejudice to his final conclusions on the Plan.
- 2.5 Of particular note is that he considers, subject to main modifications (*i.e. changes relating to the tests of soundness*), that the Plan is likely to be capable of being found legally compliant and sound and that he will set out his reasoning for this in his final report. The Inspector has invited the Council to prepare a consolidated set of the main modifications identified to date for his consideration prior to public consultation.
- 2.6 In addition, the Inspector has set out his response to the matters he wanted to consider further. These include matters relating to Local Housing Need, Housing for Older People, Accessible Housing, Self Build and Custom Build, Affordable Housing on Residential Sites, Provision for Gypsy, Travellers and Travelling Showpeople, Infrastructure Provision, Employment land provision including Innocence Farm, Suffolk Police HQ, Martlesham, South Saxmundham Garden Neighbourhood, Sequential approach to flood risk in relation to housing site allocations in Peasenhall and Witlesham, Housing Mix and Areas to be Protected from Development. The Inspector states that all the main modifications he sets out in relation to these matters are necessary for the Plan to be sound.

- 2.7 The most significant potential change to the Local Plan is the removal of the Innocence Farm employment allocation. In quantitative terms, the Inspector considers that there is currently sufficient employment land for port-related activities to meet the projected needs for the 'Central case' of approximately 67 ha, for the plan period to 2036. However, in qualitative terms he takes the view that this land supply is unlikely to meet this central case in full for the whole plan period but could be sufficient for the medium term. The Inspector expresses concern about the deliverability of the junction arrangements and implications for the viability and delivery of the site. The Inspector therefore concludes that the allocation is not adequately justified and it has not been shown that the proposal can be delivered over the plan period.
- 2.8 The Council has sent an initial response to the Inspector confirming that no additional time to respond is required and that all further information, clarifications and evidence will be provided during a two to three week period i.e. by early March.
- 2.9 Moving forward, the timetable is still subject to how the Inspector wishes to proceed, but it is anticipated that the public consultation on the Main Modifications will commence during the latter part of March for at least 6 weeks. The Inspector will then consider the feedback, any changes and whether the hearing needs to be re-opened. Assuming all goes well, the hearings will not be re-opened and the Inspector will finalise his Report. Based on current timings it is anticipated the Plan will be presented to the Full Council meeting in July 2020.
- 2.10 On adoption, this plan will supersede the Core Strategy and Development Management Policies 2013, Site Allocations and Area Specific Policies 2017, Felixstowe Peninsula Area Action Plan 2017 and the remaining 'saved' policies from 2001 Local Plan, (pre the 2004 Planning and Compulsory Purchase Act).

3 HOUSING DELIVERY TEST

- 3.1 The Housing Delivery Test was introduced in the National Planning Policy Framework 2018 and is the Government's measure of housing delivery at the local authority level. The measurement is based on delivery over the past three years and, depending on the percentage achieved, there are various measures set out that local authorities would need to take to improve delivery. Members will recall from the Report on the Strategic Planning Committee 9th September 2019, that last year the production of the East Suffolk Housing Action Plan followed the publication of the first set of Housing Delivery Test results in February 2019.

The relevant thresholds in the Housing Delivery Test, as set out in the National Planning Policy Framework, are:

- Results below 95% - production of a housing action plan to assess the causes of under delivery and identify actions to increase delivery;
- Results below 85% - inclusion of a 20% buffer (increase) on the housing requirement in calculating the five year housing land supply;
- Results below 75% - From November 2020 results onwards, the application of the 'presumption in favour of sustainable development' in decision making. Transitional arrangements mean that the relevant threshold was 25% for the November 2018 results (published February 2019) and 45% for the November 2019 results (published February 2020).

- 3.2 The second round of results were published by the Government on 13 February 2020. The results, calculated based on the former Districts, are set out below:
- Suffolk Coastal area: 127% (2018 result, published February 2019, was 128%)

- Waveney area: 89% (2018 result, published February 2019, was 72%)

- 3.3 The results for the former Suffolk Coastal district have for both years been above 100% and there have been no direct implications for this part of East Suffolk. For the former Waveney district, last years results did trigger two measures. These were that a 20% buffer (increase) was added to the housing requirement in the calculation of the five year housing land supply and that a Housing Action Plan was to be produced. Reflecting the creation of East Suffolk Council and in setting a positive approach to housing delivery across the District the East Suffolk Housing Action Plan was produced to relate to the full area and this was published in August 2019 (it is available on the Council's website at <https://www.eastsuffolk.gov.uk/planning/housing-action-plan/>).
- 3.4 The results published in February 2020 are broadly as anticipated and represent a positive outcome in that for the former Suffolk Coastal area the delivery remains comfortably above the housing requirement on which delivery is tested, and for the former Waveney area the result is more positive than last years. The requirement to produce a Housing Action Plan for the former Waveney area remains following this years results, although it is considered that the ongoing review and implementation of our East Suffolk Housing Action Plan would in any case represent a positive approach to supporting the delivery of housing through the implementation of the new Local Plans regardless of future Housing Delivery Test results. The requirement is for a Housing Action Plan to be published within 6 months after the publication of the Housing Delivery Test results, and it is anticipated that for this year this would focus on the implementation of the actions already identified in the existing East Suffolk Housing Action Plan.
- 3.5 The current Housing Action Plan includes a number of initiatives related to housing delivery which have already been put in place and the Plan acknowledges that the Council is already taking positive steps to boost and maintain delivery. The actions identified are focused on delivering the new Local Plans and the Housing Action Plan sets out specific actions around ongoing and further improvements to processes and procedures in the Planning Service, the development of further policy tools to support delivery, such as development briefs, and the work of the new Major Sites and Infrastructure Team. Housing completions are reported to Cabinet quarterly and are subject to on-going review.
- 3.6 Members may find it useful to be aware of the number of unimplemented dwellings with planning permission as of 1 April 2019; the latest date for which we have a full picture. For the former Suffolk Coastal area there were 6,058 dwellings with planning permission (including subject to a S106) still to be implemented against a housing delivery annual requirement of 542 dwellings and for the former Waveney area 3,883 against a housing delivery annual requirement of 374 dwellings. (Total for East Suffolk: 9941 dwellings against an amalgamated requirement of 916).
- 3.7 The Government intends to publish the Housing Delivery Test results in November each year, and it is therefore anticipated that the third set of results will be published in November 2020. It is also understood, based on the Planning Practice Guidance, that future Housing Delivery Tests will be calculated on an East Suffolk basis.

4 REASON FOR RECOMMENDATION

- 4.1 This report is for information only.

RECOMMENDATION

That the contents of the report, updating the Strategic Planning Committee on the emerging Suffolk Coastal Local Plan and the Housing Delivery Test be noted and endorsed.

APPENDICES – Appendix A Inspector’s Post Hearings Letter

BACKGROUND PAPERS – None