

Inspector's Note – Remit of the Inspector in respect of Suffolk Coastal Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula Area Action Plan

A number of representations have been made that the submission plans have not provided the current full objectively assessed housing need (FOAN) and therefore might not be sound. Alternatively, they have made reference to the OAN of 11,000 dwellings in the adopted Core Strategy (CS). A similar figure was referred to in the recent appeal at Framlingham (APP/J3530/W/15/3011466).

The CS took into account the revised 2010 OAN of 11,000 dwellings and policy CS2 requires the provision of at least 7,900 dwellings over the period 2010-2027. An early review of the CS was proposed to ensure that the acknowledged housing shortfall was provided, with an Issues and Options Report to be published by 2015. Although the Council has not been able to review the CS within the timescale set out in the Inspector's Report on the CS and in policy CS2, this does not change the role of the submitted plans. Their role, as lower order documents, is to help to deliver the CS, its strategy and relevant policies.

Arguments about the lack of provision for housing shortfalls in lower order documents were put forward in the Gladman Developments Ltd vs Wokingham case [2104] EWHC2320 (Admin) and more recently in Oxted Residential Land and Tandridge District Council Court of Appeal Document [2016] C1/2015/0851. The respective judgments support the view that it is the remit of Site Specific Plans is to support the CS, not substitute or amend its policies or carry out any different assessment of housing need. The new Local Plan currently being prepared by the Council is the proper place for such discussions and it would be outside my remit for me to consider any other figures than those in the CS.

As such, the plans, together with the Adastal Park planning application and other sources including windfalls and neighbourhood plans, will have to make an appropriate contribution to providing at least 7,900 homes in the period 2010-2027, as set out in policy CS2 of the CS. The discussion at the examination and my Issues and Questions, will focus on provision of at least this figure. It also has implications for the representations received on the principle of providing physical limit boundaries (as opposed to the detailed drawing of the boundaries themselves), where arguments have been based on figures other than the figure of at least 7,900 in the CS.