

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).

However, the submitted plans are lower order documents whose purpose is to help to deliver the CS, its strategy and relevant policies. 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.

Similar arguments were been 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 figure than that in the CS.

As such, the plans, together with the Adastal Park planning application, will have to provide 7,900 homes, as set out in the CS. The discussion at the examination and my Issues and Questions, will focus on 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 7,900 in the CS.