Ipswich Borough Council Local Plan Review 2018-2036 Examination

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Martyn Fulcher Head of Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich Suffolk IP1 2DE 10 March 2021

By email via the Programme Officer

Dear Mr. Fulcher,

Examination of Ipswich Borough Council Local Plan Review 2018-2036 Next Steps following Hearing

At the Examination Hearing which closed on 16 December 2020, we discussed a number of issues on which the Borough Council's team agreed to either clarify and update its evidence or provide draft Main Modifications (MMs) to address matters of soundness. These were set out in an action list that we sent to the Council after the close of the Hearing, an updated version of which is attached to this letter.

The Council has now submitted all of the documents and MMs set out in the action list for our consideration, for which we are grateful. A list of the documents provided is attached to this letter. These documents should be made available on the Examination website as soon as possible. However, we are not inviting or proposing to accept comments on this evidence now. Any parties wishing to respond to any of the documents in the list will have the opportunity to do so as part of the consultation on the proposed MMs, further details for which are set out below.

As indicated at the close of the Hearing, we are now writing to set out the next steps for the Examination. Our comments are based on all that we have read, heard and seen to date. However, we emphasise that the Examination is not yet concluded and consultation on proposed MMs is still to take place. Therefore, the comments set out in this letter are without prejudice to our final conclusions on the Plan.

There are two issues which we advised, during the Hearing, that we would need to give further consideration to before confirming the next steps. These are whether or not the Plan:

1. demonstrates a deliverable supply of housing land for the first 5 years of the plan period after adoption; and 2. would meet the accommodation needs of gypsies and travellers in line with national policy.

We have reviewed the consolidated 5 year Housing Land Supply Deliverability Table and the Housing Data note provided by the Council at our request. There are a handful of housing sites on which we remain unconvinced by the assumptions for the delivery of homes. However, at this stage, we have concluded that the combination of the progress made on the first phases of the Ipswich Garden Suburb site, the Council's own housebuilding programme, the range of brownfield opportunities coming forward in the town and the capacity for windfall sites, demonstrate a deliverable supply of housing land for the first 5 years of the plan period after adoption. This is based on and subject to the following proposed MMs:

- a stepped housing requirement of 300 dwellings per annum (dpa) from April 2018 to March 2024 and 540dpa from April 2024 to March 2036; and,
- the inclusion of care home places in the housing land supply.

With regard to gypsy and traveller accommodation, we have considered the updated evidence on the need for, and supply of, pitches at December 2020, set out in the Matter 3 Gypsy & Traveller Note, again provided at our request. We also note the evidence on the availability of additional land at the West Meadows site. Subject to MMs to reflect the updated need and supply position and to reserve land at West Meadows to meet future pitch requirements, we consider that the Plan would make adequate provision for the accommodation needs of gypsies and travellers in accordance with national policy.

Overall, at this stage of the Examination, we consider that, subject to MMs, the Plan is likely to be capable of being found legally compliant and sound. Our final conclusions on this and all of the main issues covered in our Matters, Issues and Questions (Core Documents J4 and J5) will be set out in our report, which will be published following consultation on the proposed MMs, taking account of any representations on them.

The next step in the Examination is for the Council to publish the proposed MMs for a minimum 6-week period of public consultation. The MMs will need to be the subject of Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), insofar as this is necessary, to be undertaken by the Council prior to consultation and published alongside the proposed MMs. The proposed Policies Map Changes and any Additional Modifications being proposed by the Council should be published alongside the MMs for completeness, albeit that these are outside the scope of the Examination. With regard to the evidence provided by the Council at our request during and after the hearing, the consultation should make it clear that interested parties can comment on the documents submitted as far as this relates to the soundness of the Plan.

We will respond separately with our comments on the draft proposed MMs, and will need to agree their final wording before they are published for consultation. We will also need to see the draft SA and HRA before they are published alongside the proposed MMs.

If, following the MMs consultation, we consider that a further Hearing is necessary to discuss matters raised in representations, we will advise the Council at that stage. However, currently we do not anticipate a further Hearing will be required.

We would be grateful if the Council would place a copy of this letter on the Examination website, together with the updated action list and the list of documents attached, as soon as possible after receiving it. However, we need to be clear that we are not inviting or proposing to accept comments on this letter from any Examination participants. The consultation on the proposed MMs will provide the opportunity for any further representations on whether they adequately address any outstanding issues of soundness and legal compliance with the Plan.

Yours sincerely,

Karen L Baker Mike Hayden

INSPECTOR INSPECTOR