



Babergh and Mid Suffolk

Joint Local Plan

Hearing Statement – Matter 10

Overall supply of Housing Land

August 2021



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Introduction

This Hearing Statement has been produced by the Councils for the Babergh and Mid Suffolk Joint Local Plan (JLP) Examination in response to the Inspectors' Matters and Questions. The entire Core Document Library for the JLP Examination can be accessed online.

For further information please visit the Council's JLP Examination webpages below:

<https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>

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Question 10.1

➤ ***Is there convincing evidence that:***

(a) the plan will ensure that the housing requirement across Babergh and Mid Suffolk to 2037 will be met

- 1.01 Yes. The housing requirement for Babergh and Mid Suffolk is set at Policy SP01 (Housing Needs) of the Joint Local Plan (JLP) and is informed by the local housing need assessment conducted using the standard method in national planning guidance (NPPF 2021, paragraph 61).
- 1.02 As per paragraph 06.05 of the JLP, the districts are planning to meet their full identified local housing needs. No requests to accommodate any unmet needs from elsewhere in the Ipswich Housing Market Area (HMA) have been made and as such the housing requirement in SP01 adheres to paragraph 61 of the Framework. Furthermore, reflecting the fact that paragraph 61 of the NPPF states that the standard method produces the minimum number of homes needed, Policy SP01 reflects this by setting the individual housing requirements for Babergh and Mid Suffolk as minimum requirements over the course of the plan period 2018 to 2037¹.
- 1.03 To ensure these housing requirements for the districts are met as a minimum, the JLP has identified enough housing supply to meet more than 120% of the minimum housing requirements (referred to as a 20% buffer in paragraph 06.07 of the JLP). A detailed Housing Delivery Table is included at Appendix 1 to this Hearing Statement which includes an annual breakdown of actual and forecast housing delivery over the plan period for each district. This shows that there is sufficient identified supply in Babergh to exceed the minimum housing requirement by 22% (1,708 dwelling) and in Mid Suffolk by 24% (2,451 dwelling). In effect this means that even if there were delays in delivery or certain sites did not come forward, often referred to as lapses, there is a sufficient buffer in planned supply to still meet the housing requirements as a minimum.
- 1.04 In the local context of Babergh and Mid Suffolk, it is acknowledged at paragraph 06.06 of the JLP that delivery of new housing has been a challenge with delivery below adopted housing requirements historically. The councils are taking a number of proactive measures to improve delivery rates, but it is considered that creating sufficient flexibility in housing supply will also assist in meeting the development needs of their area (as per paragraph 11a of the NPPF 2021 which requires plans to be sufficiently flexible to adapt to rapid change). Furthermore, if the councils are able to deliver more than the minimum housing requirement over the plan period, 1) this is in line with Policy SP01 which sets the housing

¹ A minimum of 7,904 net additional dwellings in Babergh from 2018 – 2037 (416 dpa) and a minimum of 10,165 net additional dwellings in Mid Suffolk from 2018 – 2037 (535 dpa)

requirement as a minimum for both authorities and 2) this would support the Government's objective of significantly boosting the supply of homes as per paragraph 60 of the NPPF 2021.

➤ ***Is there convincing evidence that:***

(b) an ongoing five year supply of deliverable housing land in both districts will exist throughout the plan period?

- 1.05 If one assumed housing was completed in line with the Housing Trajectory at Appendix 01 of the JLP, an ongoing five year housing land supply (5YHLS) can be maintained in Babergh until 2030/31 and in Mid Suffolk until 2027/28 (see Appendix 1 to this Hearing Statement). This is considered to be sound and in accordance with the requirements of the Framework for a number of reasons.
- 1.06 Firstly, as set out under question 10.1a, the JLP Policy SP01 sets a minimum housing requirement. This means that the standard method for the individual districts must be met by 2037 as a minimum, any additional supply is a bonus and allowed for in the policy wording.
- 1.07 Whilst the Housing Trajectory at Appendix 01 shows that from 2031/32 the supply of housing in Babergh is less than the annualised requirement x 5, this is simply a function of the trajectory showing the district as having delivered more than the standard method earlier in the plan period and no account being taken of that over-delivery. By the time that Babergh reaches its 'tipping point', the trajectory indicates it will have delivered a total of 7,935 dwellings which is more than the minimum housing requirement for the whole plan period (in effect achieving the 7,904 minimum figure five years early). If delivery in excess of the minimum target was 'offset', the 5YHLS position would be sustained until 2034/35, at which point the five-year period would extend beyond the plan period.
- 1.08 The same applies to Mid Suffolk where the tipping point (absent offsetting 'oversupply') is at 2029/30 (based on the Housing Trajectory at Appendix 01 of the JLP). By the following year, the authority is forecast to have delivered a total of 10,705 dwellings, i.e. exceeding the minimum housing requirement for the whole plan period of 10,165 dwellings (achieving it seven years early). Whilst the Council does not advance the idea of offsetting 'oversupply' on the housing requirement in this calculation because Policy SP01 sets it as a minimum, if the surplus was factored in then neither Babergh nor Mid Suffolk would have any problems demonstrating a 5YHLS over the plan period, because the full housing requirement would be met by 2031/32 and 2029/30 respectively.
- 1.09 Secondly, and linked to the first point, the districts should not be penalised for high delivery in early years of the plan period. Based on the analysis at Appendix

1 to this Hearing Statement, Babergh and Mid Suffolk can demonstrate in excess of a 6-year supply until 2026/27. Such a penalty would create a disincentive to drive early housing delivery.

- 1.10 Thirdly, if the trajectory was correct and the districts ‘over-delivered’ in the early phases of the plan, the absence of a 5YHLS (assuming no off-setting of ‘over-supply’) only arises in years 7-10 years from now, i.e. well after the period when the local plan would be reviewed to see if it needed updating after adoption within five years (NPPF paragraph 33). Such a review would need to consider whether relevant strategic policies (including SP01) would need updating, i.e. if the local housing need has changed significantly. This review also gives the districts an opportunity to consider whether the housing trajectory, having been delivering for another five years, is still fit for purpose to meet housing needs based on what has been happening on the ground and allocate more sites if necessary.
- 1.11 Finally, whilst LPAs must maintain a 5YHLS, it is not a requirement of the Framework for the plan to show (at the point of adoption) that this is achieved throughout the plan period. Were this the case, the NPPF would say so. It is correct that the initial version of the PPG did advise that LPAs ‘*should have an identified 5-year housing supply at all points during the plan period*’ (ID3-030-20140603). That advice does not feature in the current PPG but in any event was not directed at the plan-making exercise but was simply referring to the ongoing need to maintain a 5YHLS as a ‘rolling’ requirement. The fact that paragraph 68 of the Framework recognises that outside of the immediate 5 year period it is permissible for supply to be demonstrated by broad locations rather than specific sites confirms that there is no need for the 5YHLS for years 6-10 (or 11-15) to be identified at the time that a plan is adopted (because the concept of ‘deliverable sites’ which are a key component of a 5YHLS is not compatible with the provision of broad locations). There are clearly benefits in the Councils being able to provide as much certainty as practicable as to the future supply at the plan-making stage in order that sites for housing are plan-led, but given the requirements for plan review, it will be possible for the Councils to monitor and consider the position through the plan review mechanism. In the case of Babergh and Mid Suffolk, the point at which a 5YHLS can no longer be demonstrated based on the forecast housing trajectory, is also the period at which (or close to the period at which) the minimum housing needs will be met, and therefore any additional supply after this point is a bonus and not necessary to meet minimum needs. This supports the idea that a plan review would be appropriate within five years and beyond to ensure that the land supply position remains appropriate, and to update policies and allocate further sites, should this be appropriate.

Appendix 1

Table 1 and 2 below demonstrate the five-year housing land supply position from 1st April 2020 to 31st March 2025 (the current position), and rolls the calculation forward every year until 1st April 2032 to 31st March 2037, the last five-year period which falls within the plan period. The assumptions made about this rolling calculation are summarised below.

1. Forecast Annual Delivery is taken from the JLP Trajectory at Appendix 1 of the JLP;
2. Forecast Cumulative Delivery is taken from the JLP Trajectory at Appendix 1 of the JLP and shows at which point delivery against the total minimum housing requirement is met within the plan period;
3. The Annual Requirement from Policy SP01 is maintained on an annual basis across the whole plan period;
4. The Annual Surplus/Deficit row shows delivery against the housing requirement on an annual basis;
5. The Cumulative Surplus/Deficit row shows at which point delivery against the total minimum housing requirement is met within the plan period;
6. The Forecast Housing Delivery Test is based on the assumption that the housing requirement in the JLP is the adopted housing need for the calculation and the JLP Trajectory assumptions are used as forecast supply (Forecast Annual Delivery above). This shows that the buffer applied to the calculation will only drop below 85% such that the 20% buffer will be required, from 2035/26 in Babergh and 2032/33 in Mid Suffolk;
7. For the purposes of the Forecast 5YHLS Position, there is no backlog to apply because at no point in the plan period is there a cumulative backlog. Furthermore, because the housing requirement is set as a minimum and not a specific figure not to be exceeded, no oversupply is included in the 5YHLS calculations; and
8. Finally, the total Forecast 5YHLS Position is calculated based on the Forecast 5YHLS Delivery figure (adding up the next five years of supply from Forecast Annual Delivery) and the Forecast 5YHLS Requirement (the Annual Requirement, x 5 years x 5 or 20% buffer).



Babergh

	2018/19	20219/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	Totals
Forecast Annual Delivery	579	293	448	936	644	529	467	960	664	489	549	457	460	460	455	427	381	240	174	9,612
Forecast Cumulative Delivery	579	872	1,320	2,256	2,900	3,429	3,896	4,856	5,520	6,009	6,558	7,015	7,475	7,935	8,390	8,817	9,198	9,438	9,612	~
Annual Requirement	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	7,904
Annual surplus/deficit	163	-123	32	520	228	113	51	544	248	73	133	41	44	44	39	11	-35	-176	-242	1,708
Cumulative surplus/deficit	163	40	72	592	820	933	984	1,528	1,776	1,849	1,982	2,023	2,067	2,111	2,150	2,161	2,126	1,950	1,708	~
Forecast Housing Delivery Test			106%	134%	163%	169%	131%	157%	168%	169%	136%	120%	117%	110%	110%	108%	101%	84%	64%	
Forecast 5YHLS Requirement			2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,184	2,496	2,496	
Forecast 5YHLS Delivery			3,024	3,536	3,264	3,109	3,129	3,119	2,619	2,415	2,381	2,259	2,183	1,963	1,677					
Forecast 5YHLS Position (years)																				



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	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	Totals
Forecast Annual Delivery	690	451	607	1,261	1,197	744	467	1,412	1,155	816	785	595	525	416	402	340	336	265	152	12,616
Forecast Cumulative Delivery	690	1,141	1,748	3,009	4,206	4,950	5,417	6,829	7,984	8,800	9,585	10,180	10,705	11,121	11,523	11,863	12,199	12,464	12,616	~
Annual Requirement	535	535	535	535	535	535	535	535	535	535	535	535	535	535	535	535	535	535	535	10,165
Annual surplus/deficit	155	-84	72	726	662	209	-68	877	620	281	250	60	-10	-119	-133	-195	-199	-270	-383	2,451
Cumulative surplus/deficit	155	71	143	869	1,531	1,740	1,672	2,549	3,169	3,450	3,700	3,760	3,750	3,631	3,498	3,303	3,104	2,834	2,451	~
Forecast Housing Delivery Test			109%	144%	191%	200%	150%	163%	189%	211%	172%	137%	119%	96%	84%	72%	67%	59%	47%	
Forecast 5YHLS Requirement			2,809	2,809	2,809	2,809	2,809	2,809	2,809	2,809	2,809	2,809	2,809	2,809	3,210	3,210	3,210	3,210	3,210	
Forecast 5YHLS Delivery			4,276	5,081	4,975	4,594	4,635	4,763	3,876	3,137	2,723	2,278	2,019	1,759	1,495					
Forecast 5YHLS Position (years)					7.61															
						9.04														
							8.86													
								8.18												
									8.25											
										8.48										
											6.90									
												5.58								
													4.85							
														4.06						
															3.59					
																3.13				
																	2.33			

Mid Suffolk



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