

EXAMINATION OF THE BABERGH AND MID SUFFOLK JOINT LOCAL PLAN

HEARING STATEMENT ON BEHALF OF CAVERSWALL ENTERPRISES, HIGHBRIDGE,  
& WEST SUFFOLK NHS FOUNDATION TRUST

**Matter 3 – Housing Needs for the Settled Community and Affordable Housing**

(Policies SP01, SP02, LP06(1a) and LP08)

1. This Statement has been prepared by Vincent and Gorbing on behalf of Caverswall Enterprises, Highbridge and the West Suffolk NHS Foundation Trust (to be called 'Caverswall' in the remainder of the Statement).
2. Caverswall has interests in land north of Church Field Road, Sudbury, which is allocated in the adopted Babergh Local Plan for employment use and proposed to be de-allocated in the emerging Babergh and Mid Suffolk Joint Local Plan (JLP). A planning application for residential development and a care home on the land is currently being considered by Babergh and Mid Suffolk District Council (BMSDC).
3. This Statement addresses, where appropriate, the questions raised by the Inspector under Matter 3 – Housing Needs for the Settled Community and Affordable Housing. Caverswall has not sought to answer every question asked by the Inspector but only those relating to the representations made by them on this matter, in accordance with the guidance.

*Question 3.1: Are the plan's settled community Housing Need Targets of 416 dwellings per annum for Babergh and 535 dwellings per annum for Mid Suffolk positively-prepared and justified? In particular:*

*(b) is an "uplift" in the figures necessary to help deliver (i) affordable housing or (ii) to reflect any other factors such as growth strategies, proposed infrastructure improvements or past delivery of housing in the plan area?*

4. Paragraph 60 of the NPPF makes it clear that the standard method determines the minimum number of houses needed. The guidance seeks to significantly boost the supply of homes and provide a sufficient amount and variety of land can come forward where it is needed.

5. The Planning Practice Guidance provides further clarification on this, with Paragraph 010 of ID.2a-010-20201216 reiterating that the standard method is the minimum starting point for determining local housing needs in an area. It acknowledges that there may be circumstances where the actual housing need is higher than the standard method indicates. These circumstances include:
  - Growth strategies for the area that are likely to be deliverable;
  - Strategic infrastructure improvements that are likely to drive an increase in homes needed locally; or
  - An authority agreeing to take on unmet need from neighbouring authorities.
6. It is evident in the emerging JLP and the associated evidence base that BMSDC do not consider that any of the above circumstances apply, and this is repeated in Paragraph 6 of EP02 (Topic Paper: Housing Objectively Assessed Needs).
7. Caverswall suggests that strategic infrastructure improvements are proposed in documents including the IDP (Document ER01) and the Suffolk Framework for Growth (Document D20) which will accommodate growth and help to meet economic priorities.
8. In addition, while Caverswall acknowledge that there are no specific requests to accommodate unmet housing needs at the current time, it should be noted that there are no statements of common ground with either South Norfolk/Breckland, or Braintree/Colchester/Tendring all of which are neighbouring authorities to Babergh and Mid Suffolk. Document A07 (Paragraph 5.11 and 5.13) considers that these are not deemed necessary. However, this would suggest that there has been no discussion or agreement on the matter.
9. Furthermore, while Document ES18 and EP02 suggest that all authorities within the Ipswich Housing Market Area have made a commitment to meet their own housing needs over the relevant plan period, Caverswall are aware that Ipswich Borough Council has confirmed that their emerging local plan will not meet the Borough's housing need. There will therefore be a need to look to neighbouring areas, including Babergh and Mid Suffolk, to help accommodate this housing requirement, given the boundary constraints of Ipswich.
10. In respect of affordable housing, Paragraph 24 of ID: 2a-024-20190220 of the Planning Practice Guidance provides advice on the way in which the need for affordable housing

should be calculated. It states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

11. The Babergh and Mid Suffolk Joint Annual Monitoring Report 2019-2020 (Document EM03) demonstrates that the past delivery of affordable housing is below the level proposed in the emerging JLP for both the Babergh and Mid Suffolk area. The JLP requirement for affordable housing is 2,096 dwellings in Babergh, representing an annual figure of 110 dwellings, and for Mid Suffolk is 2,428 dwellings, representing an annual figure of 127 dwellings. EM03 shows that the average delivery of affordable units between 2015/16 and 2019/20 was 69 dwellings per year in Babergh and 107 dwellings per year in Mid Suffolk – both of which are considerably lower than the requirement in the emerging JLP.
12. On this basis, Caverswall considers that an uplift in the housing need figure is required in order to increase the delivery of affordable housing. This will help to ensure that the housing objectives in the emerging JLP are achieved.

*(c) are there any exceptional circumstances which would justify calculation of housing need on a basis other than use of the “standard methodology”?*

13. Caverswall do not consider that there are exceptional circumstances which would justify BMSDC using an alternative methodology to calculate the level of housing need.

*Question 3.3: For the plan to be sound is it necessary for it to include a mechanism by which any future unmet needs could be met within the plan area? Or is the statutory requirement for review and if necessary update of the plan sufficient?*

14. Caverswall believes that in order for the JLP to be considered sound a mechanism should be included to address any future unmet needs within the plan area. Such a mechanism would ensure that the JLP is sufficiently flexible to adapt and respond to rapid change. The plan would therefore be effective and positively prepared. Reviewing the plan would result in an unnecessary delay in meeting the unmet housing needs.

*Question 3.4: In principle is it sound for the plan to provide for around 20% more housing than the housing need targets?*

15. Caverswall considers that the provision of additional housing above the housing needs target is sound, and this approach has been adopted by Inspectors in the consideration of other local plans. Making such a provision will ensure that the JLP is effective and consistent with advice in the NPPF.
16. However, Caverswall question whether 20% is sufficient given the level of uplift likely to be required to ensure that affordable housing needs are met, account is taken of unmet housing needs from neighbouring authorities and adjustments are made as a result of the strategic growth improvements proposed.