



**BABERGH AND MID SUFFOLK
JOINT LOCAL PLAN EXAMINATION**

EXAMINATION HEARING STATEMENT – MATTER 3

Prepared by Strutt & Parker on behalf of Ruth, Bruce and Fay
Gammer

June 2021

Babergh and Mid Suffolk Joint Local Plan Examination

Matter 3: Housing Needs for the Settled Community and Affordable Housing (Policies SP01, SP02, LP06(1a) and LP08)

Introduction

This Matter Statement has been prepared on behalf of our clients, Ruth, Bruce and Fay Gammer in relation to land within their ownership at Woodside Farm to the north-west of Stowmarket and should be read in conjunction with their Regulation 19 submission dated 23rd December 2020. We have sought to respond to the questions which we consider directly relate to our previously submitted representations.

Questions

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:

- (a) has the "standard methodology" been correctly calculated?
- (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?
- (c) are there any exceptional circumstances which would justify calculation of housing need on a basis other than use of the "standard methodology"?

It is noted that Policy SP01 – Housing Needs, refers to a minimum level of delivery, however, it is considered that the policy as worded is not sufficiently 'aspirational' and does not actively seek to 'boost supply'. Furthermore, by splitting delivery between the respective plan areas, it is likely to have a limiting effect, and provide significantly less flexibility over the plan period. It is noted that until 2020 neither authority area was meeting the NPPF housing delivery test requirements. Even now delivery is significantly less than require to deliver the targets referred to in 3.1 above. The plan therefore needs to be more ambitious to meet the Government's challenge of significantly boosting housing supply (NPPF paragraph 59) and an uplift should therefore be applied.

3.2 Is the 2018 base date of the plan period justified given that the standard methodology "formula" was published in 2020 and is based on 2020 data?

Given the current date of examination and the publication of the formula, a 2020 base date would seem more logical.

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?

The plan should have a built-in review mechanism to ensure that any future unmet needs are met as quickly as possible. Reliance on the statutory requirements could lead to delays in implementation of a review.

3.4 In principle is it sound for the plan to provide for around 20% more housing than the housing need targets? [*Note: Matter 10 considers in detail whether or not the plan is likely to ensure that the housing need figures will be met.*]

It is noted that until 2020 neither authority area was meeting the NPPF housing delivery test requirements. Even now delivery is significantly less than required to deliver the targets referred to in 3.1 above. The plan therefore needs to be more ambitious to meet the Government's challenge of significantly boosting housing supply (NPPF paragraph 59) and the current national commitment to build at least 300,000 new homes each year. Accordingly, the plan strategy needs to identify the right mix and type of sites, in suitable locations, to ensure there is sufficient land available to deliver consistent and large enough numbers of new homes, throughout the plan period. More site allocations will also help with the issues associated with market absorption, again bringing greater certainty around increased delivery. It needs to be remembered that the housing numbers calculated through the Government's standard methodology must be treated as a minimum number, rather than a target. The more sites which can be allocated and the larger buffer the plan can deliver. This will increase competition in the housing market and make a significant contribution towards improving delivery and affordability. This is supported by the Government's recent announcement to adjust the standard methodology to facilitate greater growth in the Country's main urban areas, that a 35% buffer will be applied to the housing need figures for the 20 largest Cities.

3.5 Does Policy SP01(1) provide sufficient clarity about how the mix, type and size of new housing development will be determined?

No comment

3.6 Does the *Ipswich Housing Market Area Strategic Housing Market Assessment Partial Part 2 Update (January 2019)* provide a robust assessment of affordable housing needs in the districts during the plan period?

No comment

3.7 Are the requirements of policy SP02 and LP06(1a) (35% affordable housing provision on sites of 0.5ha or 10 dwellings or more) (a) justified in relation to the identified requirement for affordable homes (26.4% and 23.9% of all new homes in Babergh and Mid Suffolk respectively)?
(b) likely to be financially viable in most circumstances?
(c) likely to be effective and appropriately flexible, when applied together with the requirements of policy LP08?

No comment

3.8 Is the penultimate sentence of policy SP02(4) justified and effective? Would it be more appropriately reworded as "*In exceptional circumstances,*

where it is convincingly demonstrated that the provision of 35% affordable housing is not viable, the Council may agree to vary the requirement."?

No comment

3.9 Is policy LP08 clear and will it be effective in achieving the identified requirement for affordable housing?

No comment

3.10 Is the policy LP08 figure of 35% market housing on rural exception sites justified by robust evidence?

No comment