



HEARING STATEMENT

Examination of the Babergh and Mid Suffolk Joint Local Plan

On behalf of:

Hopkins Homes and Hopkins & Moore (developments) Ltd

In respect of:

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

Date:

June 2021

Document Reference:

GA/DJ/04019/S0002

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our clients Hopkins Homes Limited and Hopkins & Moore (Developments) Limited (the 'Hopkins Group') in respect of **Matter 3 – Housing Needs for the Settled Community and Affordable Housing** of the Inspector's Matters and Questions for the Examination of the Babergh and Mid Suffolk Joint Local Plan (the 'JLP').
- 1.2 The Statement is intended to assist the Inspector's consideration of the soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 22nd June 2021. We have only sought to answer those questions that relate to our previous representations.

2.0 Questions

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?

- 2.1 Key to answering this question is the requirements at NPPF paragraph 60 that:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for".

- 2.2 To be considered sound, the JLP must therefore take into account any needs that cannot be met in neighbouring authorities when establishing the amount of housing to be planned for. It is not sufficient for it to defer this policy requirement to a future review of the JLP. If there is an unmet need, it must be taken into account now.
- 2.3 We know from the Hopkins Group's representations to Policy SP01 (Ref: 21481), that The Ipswich Local Plan (currently at examination) identifies that it can only meet its housing requirement up to 2031 (paragraph 8.58 of the submission plan) and that beyond this there will be a shortfall of housing land up to end of the plan period in 2036 unless new sites can be found within the Borough. We also know from Ipswich Borough Council's representations to the JLP (Core Document ES19) that Ipswich Borough Council, whilst not objecting on duty to cooperate grounds, have objected to the JCS on the grounds that it does not allocate an important cross boundary site to aid housing delivery in Ipswich. We therefore know that there is a forecast unmet need in Ipswich for the period 2031-2036.

- 2.4 This unmet need must be taken into account in establishing the amount of housing to be planned for, but the only reference in the JLP to potential unmet need is contained at paragraph 06.05 which states that: *"Should it be determined through the plan making process that another authority within the ISPA is unable to meet its minimum housing need..."* This has already been determined and while Ipswich may be able to identify additional brownfield sites for redevelopment between now and 2031, this does not remove the requirement for the JLP to take this unmet need into account in a proportional manner. An appropriate mechanism by which any future unmet needs could be met within the plan area is the only sound option here as NPPF paragraph 60 requires this need to be taken into account now and not at a future review of the JLP.

Question 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)?

- 2.5 No. As set out in the Hopkins Group's representations to Policy SP02 (Ref: 21482), the Councils are proposing to set an arbitrary 35% affordable housing requirement despite their own evidence in the SHMA identifying a lower requirement of 26.4% and 23.9% of all new homes in Babergh and Mid Suffolk respectively. At pre-submission consultation stage, the only justification provided for this 35% requirement was a statement that not all sites will provide affordable housing and that it is therefore necessary for those that do to provide a higher proportion. Hopkins Group did not object to this reasoning in principle, but did object to the Councils' failure to quantify this justification (i.e. to calculate the actual number of affordable homes required from allocated sites to meet the affordable housing need).
- 2.6 The Councils have now provided more evidence on this requirement in their Topic Paper: Housing Objectively Assessed Needs (Core Document EP02), but this at best muddies the water and actually appears to show that Babergh could set an affordable housing requirement of 21.9% to meet its affordable housing requirement (based on the number of homes allocated) and Mid-Suffolk could set a requirement of 24.6%. We doubt that this was the Council's intention and as set-out in Hopkins Group's previous representations, we therefore request that a proper analysis is conducted to ascertain: (1) the number of affordable homes that will be delivered through existing planning permissions; (2) the residual requirement for affordable dwellings once existing planning permission have been accounted for; and (3) the total number of new homes to be delivered through local plan allocations on contributing sites of 10 or more dwellings (minus the 20% buffer that has been added to the supply to ensure deliverability) and thereby the percentage of these homes required to be affordable in order to meet the residual requirement.

- 2.7 It is important to recognise that in setting an affordable housing requirement that may be higher than is needed to meet identified needs, the Council are at risk of adversely affecting the viability and therefore the deliverability of some sites, thereby delivering fewer affordable homes. There is therefore important justification for undertaking the further analysis we have suggested.