

LAVENHAM PARISH COUNCIL

FORMAL EXAMINATION OF BABERGH AND MID SUFFOLK DISTRICT COUNCILS JOINT LOCAL PLAN

Matter 3 Housing Needs for the Settled Community and Affordable Housing

Further submission on Examiners questions

On Policy 08.04 and SP03 our original submission is self explanatory.

We raise Lavenham as an example of the need for the Joint Local Plan to be implemented in a flexible way, locally assessing the cumulative impact of previous developments, as part of implementing the Joint Local Plan.

The correct process for this we suggest is:

- routinely updating Neighbourhood Plans and the Infrastructure Delivery Plan (we suggest every five years including an update for each Census) and
- requiring cumulative assessments of impact from all planned and unplanned development to be updated on each new approval.

Local flexibility includes understanding the impact of development on features of added value. In the case of Lavenham, our **added value** comes from our village's character and heritage, which adds £25m per annum to the local economy as one of the major draws for tourism to the region [1].

As an example of the need for flexibility within the Plan, Lavenham has differences from the Babergh-wide norm over attractiveness for developers, proportion of heritage assets, draw for tourism and our demography that will see locally planned variances between Babergh-wide analysis and Lavenham's policies and plans on the degree of housing development that can be supported without adverse impact on the sustainability of our community (as developed and agreed within our adopted Neighbourhood Plan).

Our adopted Neighbourhood Plan seeks to protect the distinctiveness of the village from that typically found nationally (and even in Babergh as a whole) as this is important for our economic, social and environmental sustainability (as per the NPPG guidance February 2019).

The JLP, in our submission, needs to offer both support for and protection of such local assessments contained within adopted Neighbourhood Plans as the means to ensure that the Joint Local Plan is implemented in line with paras 7 to 14 of the NPPG on sustainability of local communities.

The impact on sustainability to which we refer in this submission is to our economy (tourism and heritage dependent), to our infrastructure (especially school, medical and flood risk), to the combination of grasslands, open spaces, gardens, heritage views and built environment, and to the natural, built and historic environment including bio diversity and CO² emissions [1]

Examiners questions

3.1 ... are there any exceptional circumstances ... other than use of the "standard methodology"?

Babergh has a higher percentage of grade listed heritage assets requiring care and attention to preserve their character and their setting.

The first exceptional circumstance is the need to protect a disproportionate amount of the national heritage in the JLP's methodology for settlement and site identification, housing needs assessment and in the *greater* clarity of its protection of views and landscape.

The second exceptional circumstance is the huge variation in demographic profile between settlements (both in terms of starting point and projections) that suggests the standard methodology also needs to be supported by local housing need assessments using the same methodology (potentially as part of Neighbourhood Plans)

The third exceptional circumstance is that as much as 23,000 houses or dwellings (source: Suffolk Observatory) within the two authorities is classified as **long term unoccupied** dwellings. Any assessment of housing need, site, spatial and settlement hierarchy should seek to reduce this towards near 0 by 2036, thus fundamentally changing the housing needs assessment methodology of the Council for new (as opposed to refurbished) dwellings.

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?

No. Lavenham Parish submitted a revised position statement in 2019 and maintain a constant analysis of the cumulative impact of housing.

We propose that Parish Councils be the planning authority for revisions of planned target and housing needs assessment within the life of a plan and are ready to issue our own fully formed plan to meet the target need assessed by 2036 (indeed all bar 20 of the 118 dwellings identified as needed have planning consent and are already under way -the other 20 have a site identified ready for release).

We do not believe that the two planning authorities have or can develop the local knowledge of the unique impact on infrastructure, sustainability and heritage on local communities and that their future role should be to aggregate such knowledge from their Parish Councils.

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

Not if in combination with an expected additional 5% windfall as a minimum and not without some maximum capacity for a community to support new housing.

2013-2026, Lavenham planned for 100 dwellings (a plan adopted in 2016 by Babergh) to meet a need of 100 dwellings and an identified maximum of 100 dwellings, but saw an additional 73 windfall over and above this ie 173 new dwellings were approved 2011-2021.

2019-2036 Lavenham Parish Council has submitted plans for 118 new dwellings of which 98 already have planning permission and a site for the remaining 20 has already been identified (the overlap between the two periods is 41). Despite a plan that delivers need + the buffer of 20%, already, the village and Parish Council face consultations as a community on an additional 83 houses of windfall development.

This is the direct consequence of setting no upper limit and of a plan with a reliance on windfall.

3.7 *Are the requirements of ... 35% affordable housing provision on sites of 0.5ha or 10 dwellings or more):*

(a) justified in relation to the ... requirement for affordable homes (26.4% of new homes in Babergh)?

In our adopted Neighbourhood Plan we identified a need for 55 social and affordable houses as a minimum. 2001-2014 had seen 103 houses developed using garden, infill and backfill and then a 44 house new estate. Together these provided just 9 social houses, leaving an ongoing unmet need of 46. 35% minimum for medium size estate developments gets us to within 4 of our target.

However, it requires the minimum to be applied as such whereas our actual experience is that it is used as a maximum and rounded downwards by developers.

(b) likely to be financially viable in most circumstances?

The attractiveness of the village within the housing market due to its conserved heritage, settings, grasslands, amenities and views is such that developments make a higher profit per hectare than the average in Babergh and thus any development including social housing should be affordable.

Affordability is more driven by:

- Inflated values attached to land purchase; and
- Inflated aspirations for the value of land due to developer proposals for development that is over massed and too dense. Once an expectation in the land owner has been created, it requires many refusals before a more realistic price for land is considered.

May 2021

Footnotes

[1] NPPG paras 7 to 14 relevant extracts:

the economic objective ... by identifying and coordinating the provision of infrastructure

the social objective ... with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

the environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

[2] On **tourism and heritage** Lavenham has:

- the highest proportion per capita of visitors in Babergh - see footnote on visitors
- the highest per capita and per hectare of heritage assets in Babergh

[3] Neighbourhood Plan adopted in 2016 but based on a survey in 2013: planned number of additional houses as per consultation on Neighbourhood Plan is in the range of 01-100:

"7.2.3 In summary 68% of the respondents considered that more housing is needed in Lavenham **and 82%** do not consider *more than a 100 is needed.*"

[4] Neighbourhood Plan and evidence for 35% social housing.

"Over the last 20 years of the 103 speculative/developer led houses built in the village, only one affordable house was provided in the affordable social sector. Of the 44 units currently being developed at The Halt only 8 will be for the affordable sector ... [to partially address this shortfall of 46 against a need of 55] a **minimum** of 35% of new housing units [out of the Plan of 100 maximum houses] in the village should be in the affordable sector"

[5] Table 1. Variation between impact of planned and cumulative

	Baseline	Planned		Cumulative
		New	Total	
2011	884			
2013-2031	896	100	984	100
Roll forward Plan 2016-2031	916	100	1016	132
Joint Local Plan 2022-2037	1001	118	1119	235
Windfall		6	6	241
IDP 2022-2037		20		

The difference in impact on infrastructure between 20 dwellings as used in the IDP (as adopted in 2020) and 241 cumulative represents a significant variance that is not covered by the plan