

# Babergh and Mid Suffolk Joint Local Plan Examination

Hearing Statement: Matter 3



**Boyer**

## Report Control

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# 1. INTRODUCTION

- 1.1 This hearing statement has been prepared by Boyer on behalf of Taylor Wimpey UK Ltd., in response to the Inspector's questions relating to the Babergh Mid Suffolk Joint Local Plan Examination.
- 1.2 Taylor Wimpey UK Ltd. are pleased to see the identification of "Land north of the A1071, Sproughton" under Policy LA013 within the Joint Local Plan.
- 1.3 Land north of the A1071, Sproughton is identified in the Joint Local Plan for development of approximately 800 dwellings and associated infrastructure. The allocation demonstrates that the Council consider it to be a sustainable location for development and over the plan period will contribute to the delivery of housing across Babergh and Mid Suffolk. Taylor Wimpey UK Ltd. share this conclusion and are keen to work with the Council, statutory organisations and infrastructure providers to deliver the site.
- 1.4 The principle of the allocation is supported, Taylor Wimpey UK Ltd. do have objections to some aspects of the policy and specific requirements identified within the Joint Local Plan.
- 1.5 This hearing statement relates to Matter 3 – Housing Needs for the Settled Community and Affordable Housing. It is to be read in conjunction with the representations made in response to Regulation 19 consultation.

## 2. MATTER 3 – HOUSING NEEDS FOR THE SETTLED COMMUNITY AND AFFORDABLE HOUSING

2.1 On behalf of Taylor Wimpey UK Ltd., a number of questions from the Inspector's Matters and Questions have been addressed below. For ease of reference, the question number and questions have been provided along with a response.

**Q3.3: 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?**

2.2 It is acknowledged that the Joint Local Plan has been prepared under the Duty-to-cooperate and in conjunction with neighbouring authorities. The Councils have prepared and published Statements of Common Ground with neighbouring authorities and it is clear that no unmet need has been identified at this stage.

2.3 However, as the plan has a time horizon of up to 2038, there may be instances where the current situation changes and Babergh and Mid Suffolk are asked to help meet the unmet need of another local authority. In such a circumstance, the Council would be better placed to react to this request if they have included a policy which outlines how this will be dealt with.

2.4 Babergh and Mid Suffolk have neighbours within Suffolk, Norfolk and Essex and therefore are surrounded by a wide variety of authorities, each with their different characteristics and needs. As outlined by the Council, a large part of their evidence base is however shared with the authorities of Ipswich Borough and East Suffolk (formerly Suffolk Coastal District) and collectively these make up the Ipswich Strategic Policy Area, or ISPA.

2.5 The ISPA Statement of Common Ground is a helpful document and clearly outlines the approach the authorities will take should any unmet need be identified. Taylor Wimpey UK Ltd., however are concerned that unless these arrangements are not written into policies in the Joint Local Plan there is no clarity as to how the Councils will address any unmet need, either that be a request from another authority or Babergh and Mid Suffolk making a request to a neighbour.

2.6 Across the ISPA, both Ipswich Borough Council and East Suffolk Council have included a policy mechanism to meet any unmet need, should that arise over the plan period. These examples provide a justified, workable and consistent approach to the issue and demonstrate that the plan has been positively prepared. The Babergh and Mid Suffolk Local plan is noticeably different which raises concern that the plan is not positively prepared with regards to this aspect.

- 2.7 As outlined within the National Planning Policy Framework, local authorities are required to keep their plan up to date and undertake regular reviews. This statutory duty is on all authorities but Taylor Wimpey UK Ltd. are concerned that Babergh and Mid Suffolk will not be held to account should they not complete a review within the statutory timescales.
- 2.8 History shows that Babergh and Mid Suffolk delay a review of their plans. Parts of the Mid Suffolk Local Plan which was adopted in 1998 and part of the Babergh Local Plan which was adopted in 2006 remain “live” policies and this is despite the government’s statutory requirement to review.
- 2.9 Should the Joint Local Plan have a policy in place to begin a review where any unmet need is identified this will provide greater assurance for the development industry and those bringing forward site allocations over the plan period.

**Q3.5: Does Policy SP01 (1) provide sufficient clarity about how the mix, type and size of new housing development will be determined?**

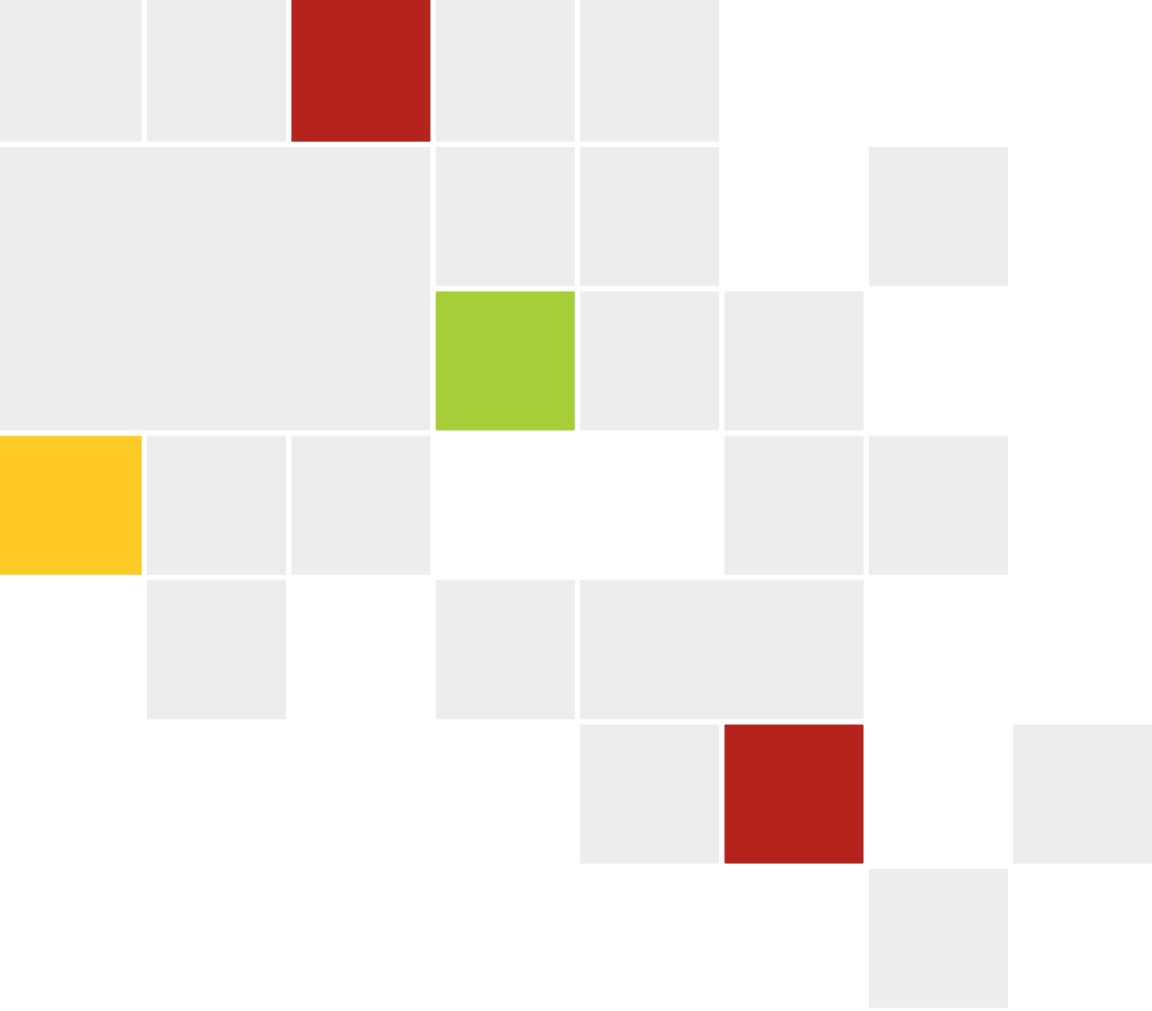
- 2.10 The policy as currently written is not effective and it has not been positively prepared. Taylor Wimpey UK Ltd. are concerned that the Council are seeking to defer the mix of housing on each site to an evidence base which is outside of the plan making process.
- 2.11 By introducing a policy which requires development to reflect the “established needs in the most relevant district needs assessment, or any local housing needs surveys where relevant” the Council are placing the decision making tools outside of the Local Plan which is not effective.
- 2.12 The primary purpose of a Local Plan policy is to provide clarity and direction for all and to aid consistency of decision making so that those bringing forward development proposals. Based on the policy as currently written, applicants, the local community, service providers and the Council (as decision makers) do not have any guidance on the mix, type and size of dwellings that are expected over the plan period.
- 2.13 Continuing with such a policy will lead to high levels of uncertainty and delay in the decision making process which then causes further delays for the development industry. This approach would do nothing to significantly boost the supply of new housing as encouraged by the National Planning Policy Framework.
- 2.14 By directing the decision making to “relevant district needs assessment, or local housing needs surveys” outside of the Local Plan, the Council has no way of monitoring the delivery of homes and ensuring that the right type of developments are coming forward over the plan period.
- 2.15 Monitoring of a Local Plan and the policies within it is essential to ensure that the plan is effective and meets the needs of the area.

- 2.16 Paragraph 06.09 of the Joint Local Plan outlines that “if appropriate new evidence is produced on the mix and type of housing required during the plan period, this will be made available on the Council’s websites in due course.” It is unclear who is responsible for producing this new evidence, when it may be published and what scrutiny it will have.
- 2.17 Taylor Wimpey UK Ltd. have serious concerns about the approach the Council is taking here, as the current mix and type of housing across the Districts over the plan period is not known and even if they were, “new evidence” could be prepared and published (without any public consultation) at any time.
- 2.18 To ensure that the policy is effective, revisions to the wording and supporting text need to be made to highlight the details of the Strategic Housing Market Assessment (SHMA) and embed these into the policy.

**Q3.7: 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?**

- 2.19 Taylor Wimpey UK Ltd. acknowledge the requirement to provide affordable housing on sites of 10 dwellings or more to ensure that a mix of dwelling types and sizes are provided to meet the local needs. However, it is unclear as to how Policy SP02 and LP06 will work together as applicants prepare schemes and the Council determine applications.
- 2.20 Policy SP02 relates to the tables of affordable housing mix for both the Babergh and Mid Suffolk District which are within the supporting text. However, it is unclear as to how these will relate to decision making and what flexibility there is within the policy as it is implemented over the plan period.
- 2.21 Policy LP06(c) outlines that the mix and type of housing needs identified in the most relevant district needs assessments evidence supported by the Council. This implies that over the plan period the Council expect the evidence to change, but does not provide justification for how this will be revised which will leave applicants blind to the Council intentions and therefore the policy is not justified.
- 2.22 The policies and supporting text should make it clear that these assessments are the starting point for considerations but where a scheme accords with the mix outlined in tables they will not come under further scrutiny from the Council as part of their decision making process.





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