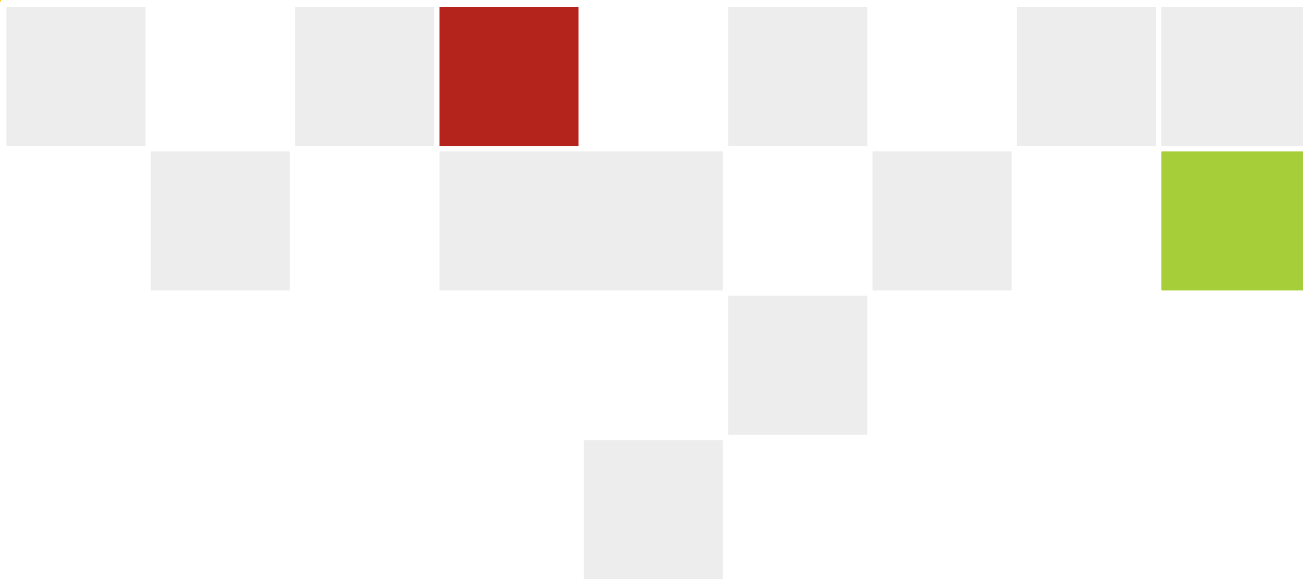


Hearing Statement: Matter 3

Babergh and Mid Suffolk Joint Local Plan Examination



Boyer

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer and is submitted on behalf of Vistry Group, trading as Vistry Homes Limited, in relation to their interest in the following sites:
 - Land north of Butcher's Land, Boxford; and
 - Land north of Brockford Road, Mendlesham.
- 1.2 Vistry Group was formed in January 2020 and brought together the former house builders known as Bovis Homes, Linden Homes and Galliford Try Partnerships.
- 1.3 Representations were previously submitted by Vistry Group to the Regulation 19 promoting the Sites for development.
- 1.4 This Hearing Statement relates to Matter 3: Housing Needs for the Settled Community. The Statement should be read in conjunction with the previous Regulation 19 representations, and Hearing Statements also submitted in relation to Matters 4 and 8.
- 1.5 Vistry Group welcome participation in the preparation of the Babergh and Mid Suffolk District Councils (BMSDC) Joint Local Plan (JLP).

2. MATTER 3: HOUSING NEEDS FOR THE SETTLED COMMUNITY

Q 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?

- 2.1 The standard methodology calculation undertaken for BMSDC is not disputed. However, this should be treated as the baseline for the District's Housing Need Targets for reasons explained under question 3.1(b).

(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?

- 2.2 As referenced in our Regulation 19 representations, the Government is explicit that the intent is for the standard method to be the starting point for determining the level of housing need for an area.
- 2.3 Within Babergh and Mid Suffolk Districts, development opportunities are plentiful as the plan area has many sustainable settlements with large areas of land relatively unconstrained. There is no Green Belt land within either of the Districts and land in sustainable locations adjacent to existing settlements is readily available for development. In his statement made on 16th December 2020, the Secretary of State was clear that the standard method should not act as a ceiling for housing need targets and he strongly welcomed the ambition for some authorities to plan to exceed their local figures. This is translated into the NPPG (Paragraph 010 Ref ID: 2a-010-20201216) where it is stated that "*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum (emphasis added) starting point in determining the number of homes needed in an area.*" It is evident that the standard method should be treated as the minimum and this is not currently reflected in the Draft JLP.

- 2.4 As referenced in the NPPG, one of the specific criterion stated where it is appropriate for increases in housing need to exceed past trends includes where an authority agrees to take on unmet need for neighbouring authorities. The Babergh and Mid Suffolk Districts neighbour the Ipswich Borough. The Ipswich Borough Local Plan was submitted for examination in June 2020 with hearing sessions taking place in November and December 2020. The next steps for the examination are still awaited but significant milestones in the plan making process have been reached. It is acknowledged by Ipswich Borough Council that later in their plan period after 2031, the Council's land supply opportunities within the Borough boundary become more limited and there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities. Indeed, it is also relevant that in the latest (2020) Housing Delivery Test results, Ipswich Borough Council only met 64% of their housing delivery requirement and as such are required to apply the presumption in favour of sustainable development. It is therefore necessary for the BMSDC Housing Need Target within the JLP to reflect and help address the housing delivery difficulties Ipswich is currently facing and forecast to continue to face.
- 2.5 The Ipswich Strategic Planning Area (ISPA) Board draws together the Councils in the Ipswich Housing Market Area (HMA) for cooperation on strategic planning matters and a signed Statement of Common Ground, evidence base reference ES01 (SoCG) has been produced which identifies potential cross-boundary issues and sets out a detailed process to follow should unmet need occur. Issues with housing delivery in the Ipswich Borough are recognised by the ISPA Board and within the SoCG, however this is not currently translated in the Draft JLP through an uplift in housing target and policy mechanism for review. Therefore, it is unclear how constructive the engagement for preparing the plan has been given that such a key cross-boundary issue is not directly addressed within the Draft. A more effective approach that would ensure the plan has been positively prepared, through cross boundary working to meet the governments ambition to boost housing supply, would be for the Housing Need Targets within the JLP to proactively reflect the delivery constraints Ipswich faces.
- 2.6 It is also important to acknowledge that BMSDC shares a boundary with a number of other authorities and there may be a future requirement to take on unmet need from these neighbouring authorities. For example, Colchester Borough Council and Tendring District Council have a heavy reliance on garden communities for their housing delivery and should these not come forward as expected, BMSDC may receive a request to help deliver any unmet need.
- 2.7 An uplift in the standard methodology Housing Need Targets for Babergh and Mid Suffolk is necessary to ensure the plan meets all four soundness tests at Paragraph 35 of the NPPF.
- (c) are there any exceptional circumstances that would justify calculation of housing need on a basis other than use of the "standard methodology"?**
- 2.8 The standard methodology is not disputed as the appropriate starting point for calculating the minimum housing need targets for the Districts.

Q 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?

2.9 No comment.

Q 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?

- 2.10 As referenced in our Regulation 19 representations, in order for the JLP to be positively prepared and effective in dealing with any cross-boundary strategic matters, it is necessary for the plan to include a policy mechanism to keep housing figures under review and provide a strategy for meeting unmet needs within the plan area. The mechanism should enable the plan to be reviewed to take account of any unmet needs within the Housing Market Area as these arise, rather than waiting for the statutory review period of “at least once every five years” as outlined in paragraph 33 of the NPPF. By incorporating an appropriate policy mechanism to instigate a review when any unmet need is identified, greater assurance can be afforded to the Local Planning Authorities and housing developers over the plan period.
- 2.11 It is recognised that Ipswich Borough Council and East Suffolk Council have both included a policy mechanism to meet any unmet need that may arise over the plan period. Their justified and consistent approach helps to demonstrate a positively prepared plan and as a similar approach has not been taken by the Babergh and Mid Suffolk JLP, concern is raised the plan is not positively prepared in this respect.
- 2.12 Notwithstanding the necessity of this policy mechanism, as there is an acknowledged issue with housing delivery in the Ipswich Borough, a policy mechanism alone is not sufficient and an uplift in housing delivery to account for unmet need should be factored into the overall Housing Need Targets as set out in our response to question 3.1b.

Q 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.]

- 2.13 The application of the 20% buffer is supported and is necessary to provide the flexibility to ensure the plan is effective in meeting minimum local housing needs. This is important to provide contingency should any proposed allocations fail to be delivered and at the rate set out within the housing trajectory. The Draft JLP has a heavy reliance on committed sites and as required by NPPF Paragraph 11, it is necessary for there to be sufficient flexibility in the land supply to take account of the fact that some sites will not come forward as expected over the plan period. The application of the 20% buffer is necessary for the plan to be effective in meeting housing need targets and ensures consistency with the NPPF.

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

- 2.14 As set out within our Regulation 19 representations, further clarity must be provided within Policy SP01 regarding the starting point for housing mix. As currently presented, the policy is not effective or positively prepared.
- 2.15 The Policy requirement, as currently worded, requires new development to respond to the *“established needs in the most relevant district needs assessment, or any local housing needs surveys where relevant”*. The requirement is too ambiguous, and would not ensure that new development responds to a tested and robust evidence base of local housing requirements. This approach leaves the Council and developers in an unsupported position, with no robust direction as to the mix, type and size of dwellings required over the plan period. Paragraph 06.09 states 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”*, however, it is not made clear how frequently evidence will be monitored, reviewed and published, or whether it will be appropriately tested (or consulted upon) to ensure it has been robustly prepared. If decision making were to be reliant on out of date or untested evidence, it could not be effective in ensuring that the right type of developments are coming forward over the plan period.
- 2.16 The Strategic Housing Market Assessment should be regularly reviewed together with up to date sales and market information. In order for the policy to be positively prepared, further details and clarity must be provided.

Q 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?

- 2.17 No comment.

Q 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)?

- 2.18 No comment.

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

- 2.19 No comment.

(c) likely to be effective and appropriately flexible, when applied together with the requirements of policy LP08?

- 2.20 No comment.

Q 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.”?

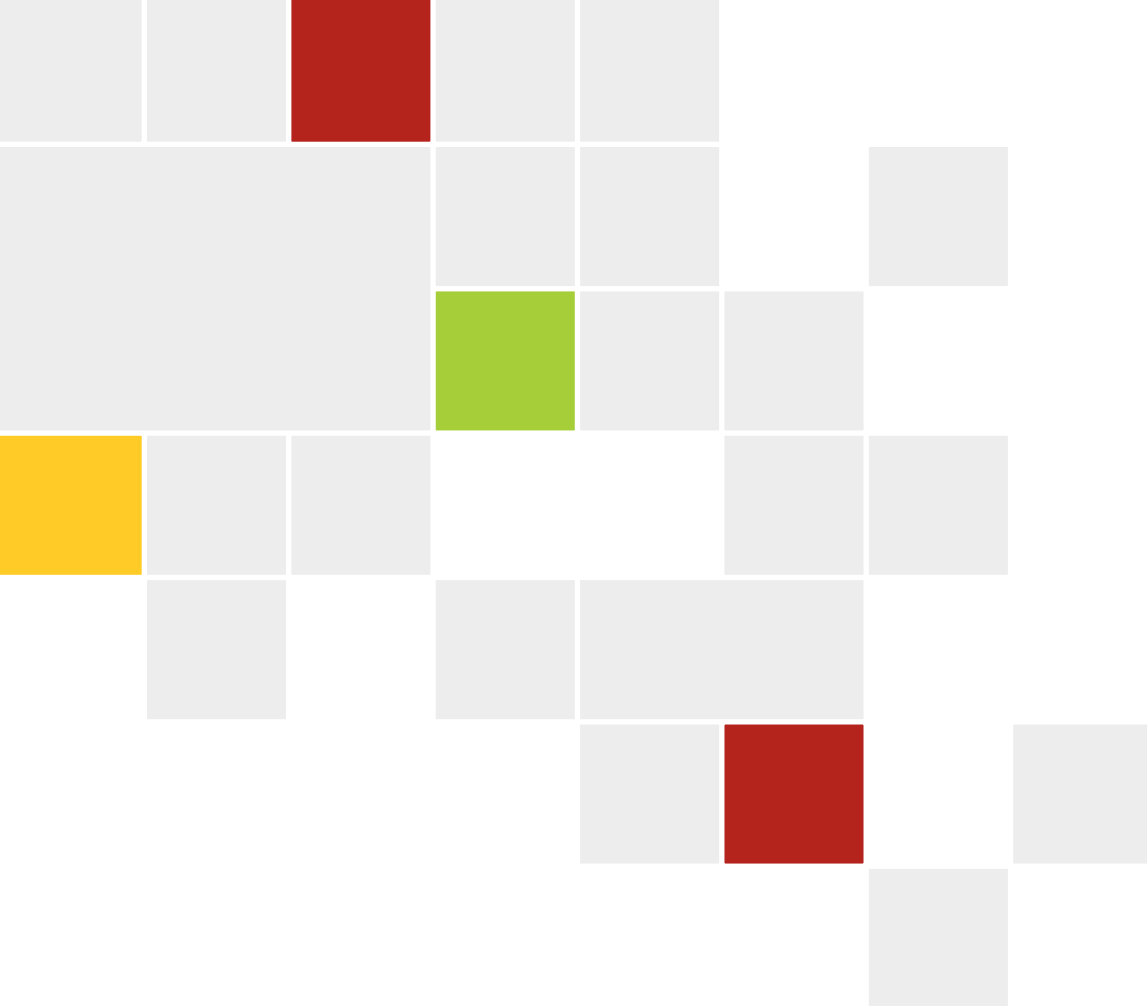
2.21 No comment.

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

2.22 No comment.

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

2.23 No comment.



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