

HEARING STATEMENT FOR

BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION

MATTER 5: LOCAL HOUSING POLICIES

BALLYMORE GROUP AND MR & MRS PRICE

Word count: 1,100



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Registered Office: Pegasus House, Querna Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

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1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of Ballymore Group and Mr & Mrs Price (the parties) in the context of the promotion of Land east, west and south of Hook Lane, Hadleigh for residential development. The site is not allocated in the submitted version of the emerging Joint Local Plan but can be identified with the reference SS0221 in the SHELAA (EH06, October 2020).
- 1.2 This Hearing Statement should be read in conjunction with representations made on behalf of the parties at previous stages of the Local Plan preparation, including representations submitted to the Regulation 19 public consultation on the Pre-Submission Local Plan in December 2020 and to the Regulation 18 Preferred Options consultation in September 2019. This Hearing Statement has been prepared following a review of the submitted evidence base. The responses are based on the plan as submitted (A01).

2.0 Matter 5 – Local Housing Policies

5.6 a) Is there robust evidence to justify the requirements of LP06(b)? Is part b) sufficiently flexible and does it take appropriate account of viability?

b) Are the requirements of part (c) clear?

- 2.1 Part a of Policy LP06 specifies that all major housing developments of 10 units or more, or sites with an area of 0.5ha or more, must provide 35% of the total homes as affordable housing. The parties have previously raised concerns in their Regulation 19 representations regarding the affordable housing requirement set out in Policy SP02 and re-iterated here in Policy LP06. The concerns related to whether the requirement appropriately reflected the identified affordable housing need.
- 2.2 Part b of Policy LP06 states that 50% of all new homes to be provided through

applications for major developments must meet the optional Part M4(2) standards of the Building Regulations, relating to accessible and adaptable dwellings. In answer to 5.6(a), this requirement is currently not justified by robust evidence, nor is the policy sufficiently flexible to allow for viability.

- 2.3 The parties understand that there is a need to ensure homes are built to meet the needs of residents, which includes those who are less mobile because of a disability or age. However, there must be evidence that this need exists, which is supported by national policy. As stated in footnote 46 of the Framework 2019, the optional Building Regulations standards such as Part M4(2) may be applied *where this would address an identified need for such properties*. This is further expanded upon by the NPPG¹ which sets out the range of evidence that LPAs must take into account when demonstrating the need for requiring the higher accessibility standards set out in the Part M4(2) of the Building Regulations.
- 2.4 It is important to carry out this evidence gathering exercise as all new homes are subject to the mandatory Part M4(1) standards of the Building Regulations. These mandatory standards are designed to ensure all homes are reasonably accessible for most people, including wheelchair users. In most cases, these mandatory standards will be sufficient to meet the needs of those who are less mobile. The Councils have not provided any evidence demonstrating otherwise. The Councils also do not appear to have undertaken any assessment to determine the accessibility and adaptability of the existing housing stock, which would contribute towards meeting any future need.
- 2.5 Indeed, the Councils currently appear to be assuming that residents reaching a certain age will automatically require enhanced accessibility provision that can only be provided in a new home rather than through the adaptation of an existing home. It is also not clear how the evidence in the SHMA (EH01 and EH02, May 2017) and SHMA Part 2 Update (EH05, January 2019), which states a potential for an increasing number of aging residents in the districts, has been interpreted to formulate the 50% M4(2) requirement. The evidence does

¹ At Paragraph: 007 Reference ID: 56-007-20150327

not show that this need exists from newly arising households only; this will also need to be demonstrated.

- 2.6 The parties therefore consider that part b of Policy LP06 is not supported by sufficient and robust evidence as required by national policy and the requirement is unjustified. The policy is also not sufficiently clear on how the part b requirement will be applied to affordable housing compared to market housing.
- 2.7 In answer to 5.6(b), the requirements of part c of Policy LP06 are not considered to be entirely clear. The policy requires major housing schemes to provide a housing mix that reflects the mix and type of housing needs identified in the most relevant district needs assessment evidence supported by the Councils. The policy wording requires clarification on two fronts. Firstly, there is no reference provided confirming what needs assessment evidence will be supported by the Councils, or indeed how the Councils will decide to support evidence. This clarification is required to provide applicants with certainty that housing mixes are being formulated and supported on an even basis across all applications. Second, there is no clarification on what is meant by 'most relevant', or again how relevance is to be determined. The policy wording should clarify that the most relevant evidence will be evidence that is the most up-to-date for the site area.
- 2.8 Additionally, the parties are keen to highlight that a district-wide needs assessment is useful for determining a housing mix but should only be considered as a starting point, especially as the age of the assessment increases. There are many other evidence points that can provide an important and useful input into determining a housing mix. For example, this can include local market signals, recent sales information from the local area, the viability of a site, and other site-specific constraints. There is also a need to ensure there is a good variety of products and mixes on the market. All these elements can together provide useful input to ensure a housing mix is meeting the actual need of a certain area within the wider district. The wording of Policy LP06 should be modified for greater flexibility, which will allow all relevant elements alongside the district needs assessment to be taken into account when

determining a housing mix.

- 2.9 As currently worded Policy LP06 could stifle much needed housing growth from coming forward and does not allow the applicant or developer to tailor a housing mix to meet local housing demands which will no doubt fluctuate over the plan period.