



## **Mid Suffolk Core Strategy Focused Review (CSFR) Examination**

### **Main issues and questions**

#### **Matter 4 Housing**

**Whether the amount and distribution of housing land would meet the full objectively assessed need for market and affordable housing in the housing market area as far as would be consistent with the policies of the Framework and whether this housing provision would be deliverable within the plan period.**

#### **4.1 Whether there is any need for tighter phasing/timing and whether phasing of housing provision would be sufficiently specific to comply with Strategic Objective 6.**

Strategic Objective 6 relates to coordination of housing, employment, retail, infrastructure and access to services. The CSFR gives an indication of phasing over five year periods, but the Core Strategy is not intended to be site specific. The Infrastructure Delivery Programme in the Stowmarket Area Action Plan and the intended introduction of Community Infrastructure Levy in Mid Suffolk and Babergh will provide more specific phasing arrangements and “trigger points” for infrastructure and services to be provided.

There is no need for a more specific phasing policy within the CSFR.

#### **4.2 Whether the quantity, location, nature, density and affordability of housing would comply with national policy and the RS.**

National policy in the NPPF requires the Local plan to meet objectively assessed needs for market and affordable housing in the housing market area, supported by a proportionate evidence base. The Strategic Housing Market Assessment for the Ipswich Housing Market Area (Ipswich, Babergh, Mid Suffolk and Suffolk Coastal areas) provides evidence of needs based on demographic and economic data and takes account of the Regional Strategy requirements. The RS set an overall target of at least 30% of housing to be affordable (social rented). The Core Strategy and CSFR set a framework for a mix, density and affordability of housing based on assessed needs and viability.

The quantity, location, nature, density and affordability of housing as proposed in the CSFR would comply with national policy and the RS.

4.3 What are the most up to date housing land supply figures? How do these support or otherwise the CSFR housing provision? How has the delivery of housing performed since the adoption of the CS?

Housing land supply figures are published in the Annual Monitoring Report and associated five year land supply update and housing land availability information. The latest information is for mid 2011. Since the Core Strategy was adopted in 2008 1,020 houses have been completed up to mid 2011, an average of 340 per year. This is below the annual average requirement but the Council firmly believes that this is solely due to wider market conditions, not to any lack of available sites.

The long term average achieved between 2001 and 2011 is 420 per year (compared to the RS requirement of 415 per year). The recent rate reflects national economic and market conditions.

4.4 Would the CSFR comply with NPPF section 6 delivering a wide choice of high quality homes?

Section 6 of the NPPF refers to significantly boosting the supply of housing. The CSFR boosts the supply and also maintains the Core Strategy approach of providing a mix of house types, sizes and affordability to cater for different accommodation needs (CS9) and high quality design (CS5).

The CSFR complies with NPPF section 6.

4.5 Whether the CSFR is consistent with the 50% brownfield target set in the Core Strategy policy CS7?

The RS suggested a brown field target of 60% (Policy SS4 of the 2004 Draft applies) which was reduced to 50% in the CS in recognition of the fact that the area was predominantly rural in nature where the availability of brown field sites was far less. This was always a challenging target, but made more so because

- some of the identified brownfield sites will be developed at a lower density. This is primarily because predominantly flatted developments no longer meet market requirements and sites are going to be developed at a lower density.
- it was assumed that the development of rear domestic gardens would contribute towards the percentage. The NPPF makes it clear that the development of such areas should not be regarded as brownfield or PDL.

It will be noted that these factors are entirely independent of the additional housing figures proposed in the CSFR. The Council will monitor progress and review this target when undertaking the next review of the Core Strategy as a whole. It falls outside the scope of the CSFR, and although it is acknowledged that the additional

allocation within the CSFR will make it less likely that the target is met over the plan period, this is a matter best dealt with by means of a plan monitor manage approach and in the context of an overall review of the Core Strategy. This is particularly so while the RS is part of the Development Plan. It would therefore not be appropriate to review this target formally at this stage.

4.6 Are the amounts of housing shown for the sites realistic and achievable? How have the quantities been worked out and could the sites provide more than specified in the allocations?

The CSFR is not site specific but quantities of housing for the broad locations proposed in the Core Strategy have taken account of pre-application engagement with potential developers and infrastructure providers, viability considerations and of community engagement, including work on the Stowmarket Masterplan and Area Action Plan.

The amounts of housing shown are considered realistic and achievable.

4.7 Whether the housing allocations, quantity and greenfield/brownfield split in the CSFR are supported by the SHLAA.

The SHLAA was first prepared in 2009 with subsequent annual updates. It includes available "land bid" sites arising from local plan consultations, the majority of which are green field sites outside and abutting settlement boundaries. Brown field sites included in the SHLAA are mainly those first assessed in the Mid Suffolk Urban Housing Capacity Study of 2006. The limited supply of brown field sites in a rural district is the main factor in the green field / brown field split. The suitability of sites has been assessed in conjunction with a panel of development industry partners. The SHLAA notes that the Core Strategy requires only about 40% of the identified supply of sites to be developed.

On balance therefore, the housing allocations in terms of quantity and split are supported by the SHLAA.

4.8 Whether the distribution of housing throughout the district would be appropriate and adequately reflects the settlement hierarchy in the CS. Whether there is any need to re-visit the settlement hierarchy set in the CS. Explain the changed quantities of housing for each settlement area including the reduction of homes in the Ipswich Policy Area to 170 from 800.

The proposed distribution of housing between the towns and villages takes account of the size, services and facilities, local employment etc of each settlement and also views from parish and town councils, residents and businesses on the capacity and acceptable scale for housing development. It reflects the settlement hierarchy in the Core Strategy.

The settlement hierarchy in the Core Strategy may need to be reviewed in future as part of the joint working with Babergh District Council and the need for a shared approach. New approaches may also arise from localism and community-led planning.

The basis of the Ipswich Policy Area figure of 800 was the estimated potential of two large brown field redevelopment sites. The figure has changed because a site allowed for at Great Blakenham (brown field former cement works site) now has planning permission for 350 houses and is under construction. It is now a commitment rather than an allocation or allowance. The estimated capacity for another potential redevelopment site at Bramford has been reduced from about 400 to 170 as a result of pre-application discussions with a potential developer and a change from high density flats and residential conversions to lower density housing and mixed commercial development. This reflects the findings of the SHMA that there is an over-supply of proposals for flats in the Ipswich housing market area.

These changes have no effect on the settlement hierarchy outside the Ipswich Policy Area.

Other changes to figures result from a full planning permission for a brown field site at Needham Market with fewer flats and a reduced total. Similarly proposals to redevelop a hospital site at Eye now have a reduced housing estimate.

#### 4.9 Whether housing allocations skew development further towards Stowmarket and whether the proportions allocated to Stowmarket are adequate.

The housing allocations in the CSFR are appropriate and adequate.

Housing provision in the Core Strategy and CSFR reflect the elected members' priority for continued development and regeneration in Stowmarket, which is by far the largest town in the District. It also reflects community expectations arising from extensive public consultation and engagement, including the preparation of Stowmarket Masterplan.

The role of Stowmarket is further examined in evidence provided within the Stowmarket Area Action Plan examination.

#### 4.10 Whether the housing allocations necessitate the additional Greenfield allocations for employment.

The Council has sought to improve the balance between housing and employment in the District to reduce the need for out-commuting and to contribute to sustainable development by allowing places to be more self-contained.

Green field allocations for employment may be needed for these and other reasons, for example to have land available for possible relocation of existing employers in unsuitable premises who might otherwise be lost to locations outside the District. Relocation could release brown field sites for redevelopment.

While the green field allocations for employment use are considered necessary and appropriate, they are not required solely because of the housing allocations.

4.11 How will the housing allocations made in the CS fit with other Mid Suffolk development plan documents proposed and proposals/permissions in other parts of the district?

The CSFR takes account of work on the Stowmarket Area Action Plan which has moved on from the estimated provision in the 2008 Core Strategy, particularly in respect of capacity of sites for development, infrastructure requirements and changes to the economy, housing market and viability.

The two Local Plans will fit well together.

4.12 Do the development plans of any neighbouring authority have any implications for the CS housing provision or vice versa?

This particularly applies to Ipswich Policy Area which includes Ipswich Borough and parts of Babergh, Mid Suffolk and Suffolk Coastal Districts. There has been cooperative planning of this area by Districts and Suffolk County Council since Structure Plans were prepared in the 1970s. The SHMA for the Ipswich housing market area now also contributes to Core Strategy housing provision.

Cross boundary considerations also apply to other areas such as Bury St Edmunds / Thurston and Diss / Eye. The proposals we are currently working on do not affect the Local Plans of the participating authorities.

4.13 Are the housing policies sufficiently clear and robust to deliver new residential development which will address the need for differing household sizes and for diverse groups?

The policies are designed to meet the needs, as identified in the Strategic Housing Market Assessment and other evidence, as described in 4.2 above. They are sufficiently clear and robust to deliver new residential development addressing the needs set out.

4.14 Are the phasing periods realistic? What are the implications of the current economic conditions? What account has been taken of availability?

The phasing periods are realistic based on what has been achieved and delivered over the past 10 or 20 years. Requirements have been met over the long term in spite of short term “boom and bust” periods in the housing market. The effects of current economic conditions are more difficult to assess because they relate more to global factors than the domestic market.

4.15 Whether the CSFR will assist in the provision of affordable housing. Whether sufficient provision would be made for the infrastructure requirements of housing development. Whether viability is sufficiently accounted for.

The CSFR will continue the Local Plan Alteration and Core Strategy approach of seeking up to 35% affordable housing from new housing developments. The higher allocations in the CSFR should provide further affordable housing. Development will also need to contribute to infrastructure while maintaining viability. The development management approach with pre-application engagement with developers and infrastructure agencies will enable up to date assessment of viability and scrutiny by independent advisers.

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