

**MID SUFFOLK LOCAL DEVELOPMENT FRAMEWORK**  
**CORE STRATEGY FOCUSED REVIEW**  
**EXAMINATION**  
**MATTER 4 – HOUSING**  
**WRITTEN STATEMENT BY**  
**CONSTRUCT REASON LTD/E. W. DURRANT & SON**

**1. 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?**

- 1.1 The amount of housing shown for each allocated site is realistic and achievable as they have been evaluated through the preparation of specific development briefs. The objective of the preparation of those briefs was to be able to demonstrate that the allocated sites were available, suitable and deliverable within the terms provided by PPS3 and now the Framework. They also enabled those participating in the Stowmarket Area Action Plan process to understand how the sites would be developed, incorporating access arrangements, landscaping and indicative layouts. They essentially represent detailed site evaluations which provide a clear indication of the number of dwellings that can be delivered and the infrastructure improvements/benefits that can arise in parallel with those developments.
- 1.2 The preparation of the development briefs has shown the Council that the level of growth described in the SAAP can realistically be achieved. The objectives of the SAAP are aspirational, but realistic; they are based upon the principles established in the EEP and the CS and we do not consider that the number of dwellings to be achieved raises issues of conformity with the East of England Plan, the CS or the Framework.
- 1.3 The variety of locations identified for growth will ensure that a wide range of housing will be provided meeting individual local needs in compliance with the Framework. The development at Stowmarket South will provide elderly persons accommodation and affordable housing and therefore offers a range of accommodation that is much needed in this location and is not proposed to be provided elsewhere.

Provision of Housing

- 1.4 The Mid Suffolk Core Strategy Focused Review Submission Evidence Base Document List includes the 'Annual Monitoring Report December 2011' and the 'Mid Suffolk District Council Five Years Supply of Housing Land 2011-16' these documents are therefore considered to be the most up to date evidence base.
- 1.5 Both documents show that there has been 4,200 dwellings completed in the period 2001/02-2010/11 at an annual average rate of 420 dwellings. The Mid Suffolk District Council Core Strategy was adopted in 2008, in the period 2007/08-2010/11 at total of

1,509 dwellings have been completed at an annual average rate of 377 dwellings; it is clear that there has been a reduction in delivery in this time probably due to market conditions and uncertainty in the planning system.

- 1.6 Therefore it is clear that there is a need for an increase in housing provision in the District in order to facilitate growth, provide more affordable housing and to meet the housing provision as set out in the Core Strategy Focused Review.

#### Infrastructure Delivery Programme

- 1.7 Statement 1 of the Core Strategy Focused Review Regulation 27 Consultation Document indicates that the focused changes will enable viable developments to come forward that are capable of providing the necessary transport, social and green infrastructure, (including affordable housing) and of supporting growth in employment opportunities for the town.
- 1.8 Concerns have been raised previously on this matter and we would refer to our Matter 7 Statement submitted to Mid Suffolk District Council in relation to the Stowmarket Area Action Plan Examination in mid 2011. This contained our reservations in relation to the proposed Infrastructure Delivery Programme (IDP) and set out clearly the concerns in relation to the imposition of a charge per dwelling which had not been calculated reasonably and did not take into account the changing economic circumstances over the plan period.
- 1.9 The policies relating to the housing site allocations at Section 6 of the Stowmarket Area Action Plan Proposed Submission (SAAP) describe the elements of infrastructure that are deemed necessary to make the proposed developments acceptable. Those requirements are directly related to the nature of the schemes described within each allocation. Accordingly, when viewed in the context of the wording of Section 122 of the CIL Regulations 2010, those elements can reasonably be funded by the allocated schemes as they are related to those proposals. The IDP set out in Appendix A of the SAAP appears to refer to a range of infrastructure aspirations, some of which cannot be deemed to be directly related to the particular allocations as required by Section 122 of the CIL Regulations 2010.
- 1.10 We are concerned that the application of the contribution per dwelling described at paragraph 12.8 of Appendix A of the SAAP will represent a financial imposition upon

the delivery of new development to the margin of economic viability. The IDP does not provide appropriate confidence that the use of presently available evidence creates a charging regime that will be robust over the period covered by the SAAP. The imposition of the suggested rate per dwelling does not take fully into consideration existing economic circumstances that are likely to persist for some years.

- 1.11 Whilst we acknowledge the content of paragraph 12.15 of Appendix A to the SAAP, we would note that Regulation 14 of the CIL Regulations 2010 requires a charging authority, in setting CIL rates, to strike what appears to it to be an appropriate balance between the desirability of funding infrastructure from CIL and the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development across its area.
- 1.12 The IDP indicates that there will be other funding streams that could be identified that will reduce the infrastructure tariff per dwelling below the figure to be found at either paragraphs 12.8 or 12.13 of the SAAP. Whilst this recognition is welcome, we are concerned that a minimum contribution will be required per dwelling merely because a figure is incorporated within an element of the statutory development plan, namely the SAAP, which has been based on inaccurate assumptions. We acknowledge the content of paragraph 12.13 of the SAAP which indicates that other contributions may be sought from developments arising elsewhere in Stowmarket's catchment area. However, the SAAP does not identify what developments may arise elsewhere which can reasonably be expected to contribute to infrastructure enhancements in the town when considered against the clear guidance provided by Regulation 122 of the CIL Regulations 2010. Appendix A of the SAAP suggests that there may be unspecified instances when other elements of funding may be identified which will be set against the figure established at paragraph 12.13 of the SAAP. Again, there is no certainty that alternative sources of funding will be provided and that the opportunity will realistically present itself to reimburse developers should alternative funding sources materialise.
- 1.13 The level of contribution stated in paragraphs 12.13 of the SAAP will have a serious impact on the viability of development schemes and this will therefore have an impact on the housing delivery in Stowmarket.

- 1.14 It is considered important to ensure at this stage of the Core Strategy Focused Review that viability considerations are assessed as part of the infrastructure provisions of proposed housing development if reference to the Infrastructure Delivery Programme is to be included within the Core Strategy Focused Review.