

Sent by email to:

30/10/2017

Dear Sir/ Madam

Response by the House Builders Federation to the consultation on the Issues and Options for the Suffolk Coastal Local Plan Review.

Thank you for consulting the Home Builders Federation (HBF) on this issues and options consultation. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Please note that as part 1 is shared with Ipswich Borough Council we have submitted the same comments to both Councils.

Part 1: Strategic cross boundary issues for Ipswich Borough and Suffolk Coastal District

We welcome the collaborative approach that has been taken by Ipswich Borough Council (IBC) and Suffolk Coastal District Council SCDC in taking forward the reviews of their local plans. Given the constrained boundary faced by Ipswich and the level of housing needs across the Ipswich HMA it is important that all the authorities in this HMA continue to work together to ensure housing needs are met. It will be important that both Councils continue to work closely with the other authorities in the HMA. We recognise the Babergh and Mid Suffolk are preparing a joint Local Plan and it will be important that there is a high degree of commonality between these Plans. Consistency between plans within an HMA reduces the complexity for all applicants operating within the area and should be a key aim for the four authorities.

However, whilst we are pleased to see this level of collaboration we are concerned that the level of housing needs arrived at through the Strategic Housing Market Assessment

(SHMA) and set out in the consultation document is not sufficient. In particular we consider that the SHMA should have taken more account of market signals. The issue of market signals has had a significant amount of debate at local plan examinations across the Country with varying outcomes. One of the most recent examples of this was at the Examination in Public of the Canterbury Local Plan. Canterbury has similar market signals to the Ipswich HMA, for example a lower quartile housing to earnings ratio of just over 10, and the Inspector considered a 20% uplift to be appropriate in these circumstances.

However, the recent consultation document “Planning for the right homes in the right places” now provides a clearer direction as to how the Government considers market signals should be taken into account and, most importantly, the level of uplift that should be applied. For the Ipswich HMA it would suggest that insufficient weight have been given to market signals and the proposed uplifts should be increased in those areas where affordability is worst. Whilst this is still a consultation document, and only limited weight can be given to its contents at present, it does signal that the authorities in the Ipswich HMA should consider higher uplifts in relation to market signals.

The eventual level of housing need to be considered by the authorities in the HMA will also dictate the development strategy adopted. We would suggest that as a minimum the Councils look to prepare strategies on the basis of ‘Scenario B’. This level of need would be more in line with the Government’s expectations with regard to boosting housing supply. This is a positive approach towards housing delivery and economic growth and one that could be supported by the HBF. However, we would also encourage the Councils to consider ‘Scenario C’. In taking forward such an approach, with large scale strategic allocations, the Councils will need to be clear as to the timescales that would be required to deliver this level of growth. The large sites that the Councils suggest would be unlocked by new infrastructure are likely to take a considerable time to come forward and this should be factored in when considering delivery timescales. Therefore if ‘Scenario C’ is taken forward the Council will need to consider how it can support smaller sites that will be delivered within shorter timescales and ensure a strong supply of housing supply in the first ten years of the Local Plan.

With regard to where new development should go we would suggest that the Councils do not look at just one option but at a combination of those options put forward. It is likely that some of IBC’s housing needs will have to be delivered outside of the Borough. The City is constrained by its tightly drawn boundary and whilst some higher

density development and changes of use must be considered, there will be a need for some of Ipswich's needs to be accommodated elsewhere. As such it is essential that IBC are clear as to how many homes will be provided elsewhere and ensure that the other authorities in the HMA allocate sufficient sites to meet those unmet needs.

It is therefore likely that the options being considered by SCDC will need to take account of the need to meet some of Ipswich's unmet needs. Whilst meeting some of these needs near to Ipswich is a consideration the Council should not restrict itself to such an approach. The housing needs of an HMA can be met anywhere within that HMA and increasing housing delivery at other towns and villages should be considered. There are clearly options for delivering increased growth across the District on the basis of the options set out in figure 4. SCDC might want to consider an approach that draws on aspects of each option that will support the necessary growth to meet the needs of the area.

Given the fact that needs are likely to be met across both Councils it is essential that it is clearly indicated in the plan how needs are being met and that there are shared policies, contingency measures and monitoring to facilitate this joint working. Whilst this can be set out within the relevant plans the Councils may want to consider preparing a joint local plan or a shared strategic framework similar to the that has been undertaken in the North Essex¹ HMA.

Part 2: Development Management Policies

Affordable housing

The Council asks within the consultation whether its existing affordable housing policies are appropriate? Having viewed the Core Strategy the answer is no. The current policy is not in conformity with national planning guidance as it seek contributions from development of ten or fewer homes. The review must ensure that this new policy position is taken into account. Another key element of any policy will be its flexibility. When testing a plan's viability it is not possible to test all development scenarios, as such it is important to ensure that there is flexibility within the policy to recognise that some development will be made unviable by the polices in the Local Plan. Flexibility within the local plan is essential and something that is recognised through the NPPF. In

¹ North Essex HMA comprises of Braintree, Tendring and Colchester

particular paragraph 14 of the NPPF outlines the need for plans to be flexible in order to adapt to rapid change when meeting objectively assessed needs.

Physical limits boundaries

If the Council chooses to use physical limits boundaries they should be based defined to allow new development to come forward throughout the plan period and to reflect the capacity of a village, or cluster of villages, to support new development. With these boundaries the Council should then allocate land for development. This approach will provide the necessary certainty to support new development, and in particular SME developers. Such sites should be seen as vital to the Council in providing a mix of development sites which can be delivered more rapidly than larger strategic sites and as such support the Council in maintaining a five year supply of housing land.

Rural housing and settlement clusters

The Council should consider directing growth to clusters of villages that can provide the necessary services to support that growth. It is important to recognise that within rural communities villages rarely act as standalone service centres and as such can support more growth than if considered on a village by village basis. However, the Council should also consider how it can provide the necessary services within a village, or cluster of villages, that will allow new development. Such an approach not only has the benefit of ensuring continued provision of existing services from increased demand but can ensure new services are delivered to support both existing and new residents.

Housing type and mix

Policies need to provide a mix of certainty and flexibility. It is important that applicants are clear as to the expectations of the local authority with regard to the housing mix. However, as with the affordable housing policy, it is essential that the application of this policy can be flexible to support development that may not be viable at the required mix. It is also important to ensure that any viability assessments consider the impact of housing type and mix – specifically if the Council are seeking to deliver more smaller units and housing for older people. The delivery of such units can impact on either the development costs or the returns on development and if the Council wants to encourage such development it will need to ensure policy and infrastructure costs are not prohibitive.

I trust you will find these comments helpful and if you would like to discuss any aspect of our representation or the work of the HBF please feel free to contact me.

Yours faithfully

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Home Builders Federation

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