

Sent by email to: localplan@baberghmidsuffolk.gov.uk

08/11/2017

Dear Sir/ Madam

Response by the House Builders Federation to the consultation on the Babergh and Mid Suffolk Joint Local Plan.

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.

We welcome the collaborative approach that has been taken by Babergh District Council and Mid Suffolk District Council in taking forward a joint local plan. We also note that Ipswich Borough Council and Suffolk Coastal District Council are at the early stages of preparing new local 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 and it will be important that there is a high degree of commonality between these Plans.

Housing Requirement

Given the constrained boundary faced by Ipswich Borough Council (IBC) 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 needs are met. It is likely that Babergh and Mid Suffolk will need to take a proportion of any unmet needs arising in IBC. At present the Joint Local Plan is currently only seeking to meet the needs of both Boroughs and we would suggest that any final requirement is based on meeting the needs Babergh and Mid Suffolk as well as a proportion of any unmet needs arising from IBC. Given the similar timelines with regard to plan preparation across the HMA this should not delay the delivery of the Joint Local Plan.

We are also 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 indication 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 has been given to market signals. We consider it necessary that the market signals uplift proposed in the SHMA should be increased in those areas where affordability is worst. Whilst the Government’s proposals are still being consulted on, 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.

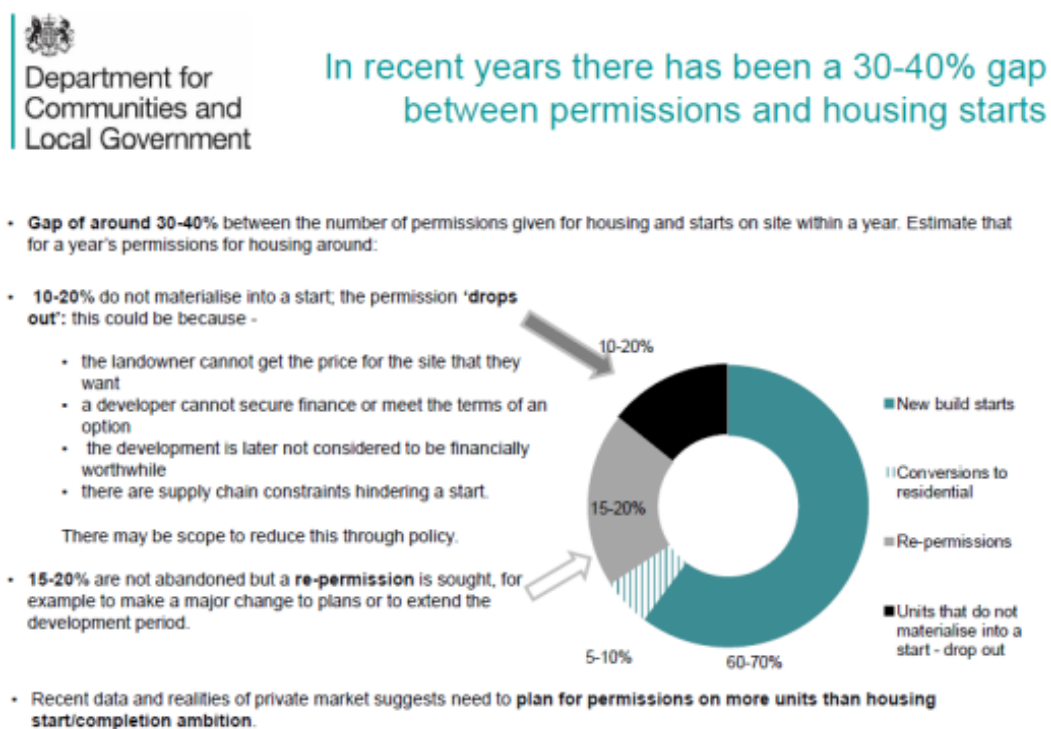
Housing Delivery

We would suggest that the Council takes forward option HD1 and apply a contingency when allocating sites. It is our experience that, for a variety of reasons, some sites are likely to take longer to come forward than set out in the plan. Because of this we would suggest that alongside contingency measures the Council takes a cautious approach to its expected delivery. This may require allocating more sites during this plan period but it will mean that there is less likelihood of using a contingency measure. A key aspect of maintaining supply will also be the allocation of more small sites. Such sites can be delivered more quickly than large strategic sites and ensure a robust five year supply. By allocating such sites the Councils will also reduce the risk to small and medium sized house builders of bringing these sites forward. This is an important aspect of the Government’s drive to diversify the housing market that will ensure a robust and mixed supply of new homes across both Districts.

We would also suggest that any reserve sites vary in size. Should development not come forward as expected the Council will need to ensure that the reserve sites can come forward rapidly to ensure delivery is consistent with the trajectory and a five year

supply of developable land is maintained. As outlined above smaller sites are on the whole quicker to progress through the planning system and to deliver new homes and as such will be best placed to achieve this aim. If the Government chooses to implement the Housing Delivery Test that would form a reasonable basis for triggering the use of reserve sites. The release of reserve sites could form part of any action plan the Council would be required to prepare should delivery fall below expectations.

The potential scale of any contingency is difficult to quantify precisely. However, the DCLG have undertaken some work around permissions and housing starts. The slide below indicates that they consider 10-20% of units do not materialise from permissions and 15-20% will be delayed. Whilst their evidence is based on delivery rates across England it does provide robust evidence to indicate that more flexibility is required within the first five years of the plan and that a marginal five year supply must be a concern.



Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

Spatial Distribution

It is likely that the options being considered in the Joint Local Plan 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 area and the Districts might want to consider an approach that draws on aspects of each option. As outlined above it will be important to ensure that the Councils bring forward a range of sites in a range of locations and not seek to rely heavily on a few large strategic sites.

Affordable housing and 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 level of affordable housing and type and mix of new homes that will be expected. However, it is essential that the application of these policy can be flexible to support development that may not be viable as specific in the policy. 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 are 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.

Functional 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 to come forward. 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.

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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