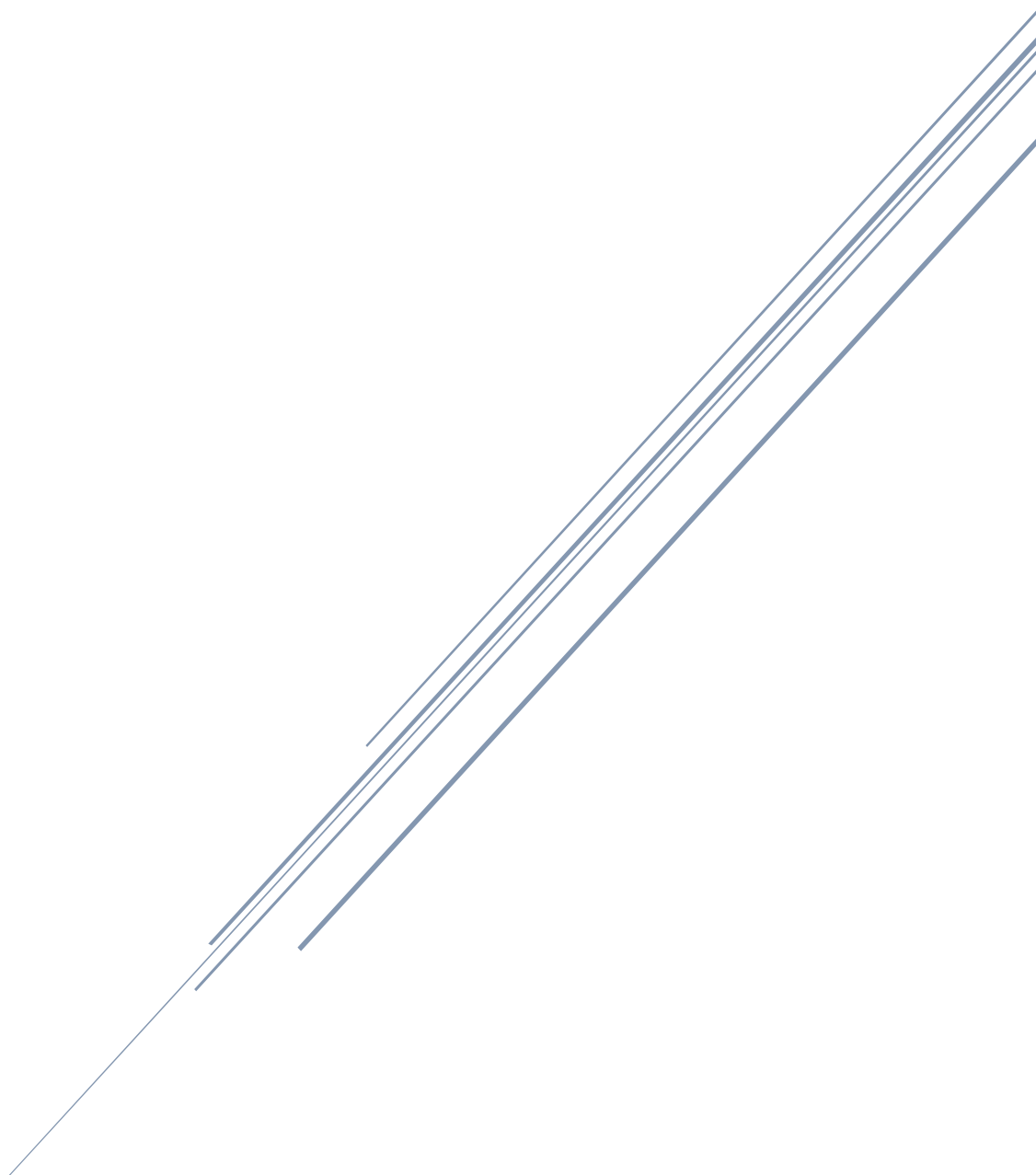


BABERGH AND MID SUFFOLK JOINT LOCAL PLAN

Topic Paper: Housing Objectively Assessed Needs



March 2021

Joint Local Plan Topic Paper

Housing – Objectively Assessed Needs

Introduction

1. This topic paper is one in a series in the [Core Document Library](#), which sets out how we have developed the policies within the Babergh and Mid Suffolk Joint Local Plan (JLP). Each topic paper will look at the relevant national and local guidance that informs the Joint Local Plan. Topic papers explain how the policies have developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.
2. The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Joint Local Plan through the process to adoption.

Local Housing Need Assessment

3. In order to be found ‘sound’ local plans must provide a strategy, which as a minimum seeks to meet the area’s objectively assessed needs (National Planning Policy Framework (NPPF) para 35a). Furthermore, strategic policies should provide a clear strategy for bringing sufficient land forward to meet development needs (para 23).
4. To determine the minimum number of homes needed, the NPPF (para 60) requires that strategic policies should be informed by a local housing need assessment, conducted using the Government’s standard methodology for calculating local housing need, unless exceptional circumstances apply. PPG sets out how local housing need should be calculated. Firstly, Office of National Statistics (ONS) 2014-based household projections¹ are used to calculate the projected average annual household growth over a 10-year period. Secondly, using the most recent median workplace-based affordability ratios (published in March 2020²) an adjustment is made to take account of affordability. Thirdly, the local housing need figure is capped at 40% above the higher of the projected household growth or the average annual housing requirement set out in adopted strategic policies. Finally, an uplift is applied to urban local authorities in the top 20 cities and urban centres list.

¹ Office for National Statistics (ONS) 2014-based household projections – Table 406:

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

² Office for National Statistics (ONS) -

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

5. The Babergh and Mid Suffolk Joint Local Plan uses the Government's standard methodology to identify the minimum number of dwellings required. This is calculated below. The cap as advocated by the NPPG does not apply in Babergh or Mid Suffolk, nor does the uplift applied towards the largest urban areas.

Table 1: Local Housing Need Calculations for Babergh:

Average household growth (2020 – 2030)	290
Affordability Ratio (March 2020)	10.95
Calculated Annual housing need	416
JLP Plan Period in Years	19
Local Housing Need Over Plan Period (Plan Period x Annual Housing Need)	7,904

Table 2: Local Housing Need Calculations for Mid Suffolk:

Average household growth (2020 – 2030)	408.1
Affordability Ratio (March 2020)	8.99
Calculated Annual housing need	535
JLP Plan Period in Years	19
Local Housing Need Over Plan Period (Plan Period x Annual Housing Need)	10,165

6. The NPPG states that there are circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. These include deliverable growth strategies (such as Housing Deals), strategic infrastructure improvements resulting in increased housing demand, unmet housing need from neighbouring authorities, previous assessments of need or recent housing delivery exceeding the standard method. These circumstances do not apply to the Babergh and Mid Suffolk context.

7. [The Ipswich & Waveney Housing Market Areas Strategic Housing Market Assessment \(SHMA\) - Part 1 \(May 2017\)](#)³ indicated a lower housing need for both districts, than that established through the Government's standard method. A SHMA - Partial Part 2 Update was published in January 2019⁴, which sought to determine the size and tenure of new housing required within the needs established through the Local Housing Need assessment at that time⁵. Since the publication of the report, the Councils have recalculated the Local Housing Need requirements, in accordance with the Government's standard methodology, as set out in Tables 1 & 2.
8. Historically housing delivery rates in both districts, have been below the level of need suggested by the standard methodology. All authorities within the Ipswich Housing Market Area (HMA) have made a commitment to meet their own housing need over the relevant plan period, as evidenced in the [Ipswich Strategic Planning Area \(ISPA\) Statement of Common Ground V7 \(March 2021\)](#)⁶. No authorities outside of the HMA have requested that Babergh or Mid Suffolk District Council accommodate any unmet need. As such the JLP is not required to plan for unmet housing need from neighbouring authorities.
9. In addition to the examples set out above, the Councils do not believe there is any other evidence to justify an alternative approach, and/or the JLP planning for a higher level of need than the standard method suggests.

Affordable Housing Requirements

10. Affordable housing is an identified need as required by the NPPF (para 61). Annex 2 of the NPPF (2019) sets out the definition of affordable housing and is split into the following four main categories: affordable housing for rent, starter homes, discounted market sale housing and other affordable routes to homes ownership.
11. [The SHMA Part 2 update \(January 2019\)](#)⁷, which updated the [SHMA Part 2 \(May 2017\)](#)⁸, identifies the affordable housing needs using the 2014-based household projections. When the figures are applied up to the 2037 end date

³ Core Document Library Reference EH01.

⁴ Core Document Library Reference EH05.

⁵ This used 2017 affordability ratios which were published in April 2018

⁶ Core Document Library Reference ES18.

⁷ Core Document Library Reference EH05.

⁸ Core Document Library Reference EH02.

of the Plan, the total affordable housing needs of the district areas are as follows⁹:

Table 3: Total affordable housing need 2018-2037

<u>District</u>	<u>Total affordable housing dwellings</u>	<u>Annual affordable housing dwellings</u>
<u>Babergh</u>	<u>2,096</u>	<u>110</u>
<u>Mid Suffolk</u>	<u>2,428</u>	<u>128</u>

12. Much affordable housing is delivered by Registered Providers. [The Babergh and Mid Suffolk Joint Annual Monitoring Report 2019 - 2020 \(October 2020\)](#)¹⁰ identifies the delivery of affordable homes since 2015/16, which in Babergh totals 347 homes (69 per year average) and in Mid Suffolk totals 536 homes (107 per year average) (pages 13 and 15). Since the start date of the Joint Local Plan (2018) affordable housing completions have been 166 homes in Babergh and 246 homes in Mid Suffolk.
13. Based on the previous five years historic affordable housing delivery completions being projected forward and the housing supply identified in the Joint Local Plan, the Councils expect the following delivery of affordable homes:

Table 4a: Expected affordable housing delivery 2018-2037

<u>District</u>	<u>Total affordable housing dwellings</u>	<u>Annual affordable housing dwellings</u>
<u>Babergh</u>	<u>2,103</u>	<u>111</u>
<u>Mid Suffolk</u>	<u>3,108</u>	<u>164</u>

Table 4b: Breakdown of affordable housing delivery in Babergh

		<u>Dwellings</u>
1.	Total dwellings past delivery 2015 – 2020	1,586

⁹ Core Document Library Reference EH05. For Babergh see Table 4.6c Size of new Shared Ownership accommodation, Table 4.7c Size of new Social Rent/Affordable Rent and Table 4.8c Potential demand for discount home ownership/Starter Homes in Babergh by size over the next 18 years, pp. 28-29. For Mid Suffolk see Table 4.6e Size of new Shared Ownership accommodation, Table 4.7e Size of new Social Rent/Affordable Rent and Table 4.8e Potential demand for discount home ownership/Starter Homes by size in Mid Suffolk over the next 18 years, pp. 38-39. The data shown in Table 3 in this topic paper projects to 2037.

¹⁰ Core Document Library Reference EM03

		Dwellings
2.	AH past delivery 2015 – 2020	347 (21.9%)
3.	AH policy on site requirement (schemes 10+ or 0.5ha)	35%
4.	AH total identified needs 2018 – 2037 (from SHMA)	2,096
5.	Standard method total housing requirement 2018 - 2037	7,904
6.	Projected AH from standard method total dwellings 2018 – 2037 (<i>row 5 x row 2 %</i>)	1,729 (-367 deficit)
7.	Total JLP dwellings planned 2018 – 2037	9611
8.	Projected AH from JLP dwellings planned 2018 – 2037 (<i>row 7 x row 2 %</i>)	2,103 (+7 surplus)

Table 4c: Breakdown of affordable housing delivery in Mid Suffolk

	MID SUFFOLK	Dwellings
1.	Total dwellings past delivery 2015 – 2020	2,176
2.	AH past delivery 2015 – 2020	536 (24.6%)
3.	AH policy on site requirement (schemes 10+ or 0.5ha)	35%
4.	AH total identified needs 2018 – 2037 (from SHMA)	2,428
5.	Standard method total housing requirement 2018 - 2037	10,165
6.	Projected AH from standard method total dwellings 2018 – 2037 (<i>row 5 x row 2 %</i>)	2,504 (+76 surplus)
7.	Total JLP dwellings planned 2018 – 2037	12,616
8.	Projected AH from JLP dwellings planned 2018 – 2037 (<i>row 7 x row 2 %</i>)	3,108 (+680 surplus)

14. Babergh and Mid Suffolk District Councils are also delivering affordable homes and a three-year rolling Joint Affordable Homes Development Strategy, which commenced in 2017, identified a number of affordable homes the two Councils intended to develop under the Housing Revenue Account (HRA). The target delivery numbers were changed to reflect the removal of the debt cap for social housing. This increased the target from 200 to 214 in Babergh and from 98 to 200 in Mid Suffolk. The HRA Business Plan is currently being reviewed and will be presented to the Councils at the beginning of 2021, setting out the strategy for the next period. There is also the opportunity for the Councils to purchase market housing through the HRAs for use as affordable housing.
15. As at August 2020, more than 150 new Council homes are to be delivered over the next three years in Babergh. In Mid Suffolk, 223 homes are to be delivered between 2020 and 2022.
16. The Councils are also involved in two development companies, Babergh Growth Ltd and Mid Suffolk Growth Ltd. These companies will deliver both affordable and market housing over the plan period. There is also the potential for these companies to deliver more affordable housing as part of development schemes above policy requirements.
17. Community Land Trusts are now active in meeting local housing needs and providing more affordable housing supply. For example, the [Lavenham Community Land Trust \(CLT\)](#) through Hastoe Housing, have delivered 18 affordable homes at Peek Close, completed in October 2019 (most for rent, some shared ownership and two starter homes). As more CLTs are created, this will provide an additional supply of affordable homes over the plan period.
18. Rural exception housing is another way of additional affordable housing being provided. To ensure assist in the delivery of rural exception housing, up to 35% of market housing on rural exception sites will be supported, where it is financially necessary in order to secure and deliver additional local affordable housing.
19. Neighbourhood Plans can also provide for more affordable housing through the allocation of land for a greater number of homes than is identified within the JLP.

Housing Needs of Different Groups in the Community

20. Paragraph 61 of the NPPF requires Local Planning Authorities to assess the needs of different groups in the community (such as families with children, older people, students, people with disabilities, service families, Travellers, people

who rent their homes and people wishing to commission or build their own homes. The following sections demonstrate how the Joint Local Plan meets this requirement, with Appendix 1 providing a succinct overview of the Joint Local Plan meets the needs of the different groups within the community.

Families with Children and Other Households (including students)

21. Within the general needs identified for Babergh and Mid Suffolk Districts, the SHMA Part 2 Update (January 2019)¹¹, identified specific needs for families with children and other 'household' needs. No specific student needs are identified and these are included within other 'household' needs. Table 5 below shows these needs across the Plan period to 2037. These needs are to be met through the Local Housing Need requirement set out in policy SP01.

Table 5: Identified needs for families with children and other household needs 2018-2037

District	Families with children	Other household needs
Babergh	772 families	1,029 households
Mid Suffolk	1,673 families	678 households

Rented Accommodation

22. Rented accommodation needs (households) are also identified in the SHMA Part 2 Update¹² as shown in Table 6 below for the plan period 2018 to 2037.

Table 6: Rented accommodation needs (households) 2018 - 2037

District	Total	Private rent	Social / affordable rent
Babergh	2,225	1,186	1,039
Mid Suffolk	2,481	1,121	1,360

23. Rented accommodation is addressed through general and affordable housing provision. The Councils seek 75% of all affordable housing provision to be rented accommodation, and with 35% affordable housing being sought on major developments within the JLP, this would meet the rented needs identified.

¹¹ Peter Brett Associates (Jan 2019) – Ipswich Housing Market Area (IHMA) Strategic Housing Market Assessment (SHMA) – Partial Part 2 update (hereinafter referred to as 'SHMA Part 2 Update'), Appendix B: HDH Planning & Development Ltd (Jan 2019) – IHMA Update to the SHMA: Housing type requirement arising from the new 2014-based Local Housing Need Assessment (see Table 4.1c, p. 25 and Table 4.1e, p. 35). The data shown in Table 3 in this topic paper projects to 2037. Core Document Library reference EH05.

¹² Core Document Library Reference EH05

Service Accommodation

24. The Ministry of Defence (MoD) operates one site within the plan area, RAF Wattisham, near Wattisham in Babergh. During the production of the SHMA, the site was contacted and asked about the current accommodation provision for its service personnel, what expectations they have for future growth and where this growth will be accommodated. As set out in the SHMA¹³, there are no plans to alter the size of the military population at RAF Wattisham, and at the time of the report, there were a number of vacant family units within the service families' accommodation in Wattisham.

Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Needs

25. The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (hereinafter referred to as the 'ANA' (May 2017)¹⁴ identifies the respective needs for Babergh and Mid Suffolk Districts between 2016 and 2036. The JLP plan period is 2018 to 2037 and therefore adjustments are made where necessary to the needs identified. Tables 7, 8 and 9 provide an overview of the needs identified needs, as well as the provision identified through the Councils' monitoring undertaken in January 2020. Appendix 2 provides a detailed breakdown of the supply of Gypsy, Traveller and Travelling Showpeople plots and pitches.

Table 7: Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Needs 2016 – 2036

	Babergh	Mid Suffolk
Gypsy and Traveller pitch needs ¹⁵	1	9
Travelling Showpeople plot needs ¹⁶	0	7
Boat moorings ¹⁷	10	0

¹³ Core Document Library Reference EH02, pages 100 and 101.

¹⁴ Core Document Library Reference EH03.

¹⁵ Core Document Library Reference EH03. Table 6.4: Summary of Gypsy and Traveller and pitch needs 2016-36, p. 74, Babergh Gypsy and Traveller Pitches, p. 117, and Mid Suffolk Gypsy and Traveller Pitches, p. 119

¹⁶ Core Document Library Reference EH03. Table 8.3: Summary of Travelling Showpeople plot needs 2016-36, p. 87, Babergh Travelling Showpeople Plots, p. 122, and Mid Suffolk Travelling Showpeople Plots, p. 124

¹⁷ Core Document Library Reference EH03. Table 10.3: Summary of permanent residential mooring needs 2016-36, p. 106, Babergh (Boat Moorings), p. 127, and Mid Suffolk (Boat Moorings), p. 129

Table 8: Gypsy and Traveller pitches (provision, needs and supply)	Babergh	Mid Suffolk
Residential pitches in 2016	1	62
New supply 2016-21	0	3
Residential pitches in January 2020 ¹⁸	1	88
Identified Gypsy and Traveller Needs (Total)	2	74
Supply Against Identified Needs	-1	+14

Table 9: Travelling Showpeople plots (provision, needs and supply)

	Babergh	Mid Suffolk
Identified Travelling Showpeople Needs	0	7
Travelling Showpeople Plots in January 2020 ¹⁹	0	7
Supply Against Identified Needs	0	0

26. Site visits for the monitoring of caravan counts usually takes place on a six-monthly basis each year (January and July). However, no count was undertaken in July 2020, or January 2021, due to the Coronavirus pandemic and lockdown/movement restrictions. It is important to note the monitoring data feeds into the bi-annual caravan count (MHCLG return data G&T caravan count) ensuring consistency in the data reported. Appendix 2 provides a detailed list of the caravan count data as assessed in January 2020 and has been derived by assessing and analysing pitches on the planning permissions; cross referencing with the ANA evidence; site awareness of caravan count and satellite mapping system; known planning permission numbers and sites known to be authorised. All pitches identified in the monitoring data are authorised.

27. Policy LP09 addresses the Gypsy, Traveller and Travelling Showpeople needs in Babergh and Mid Suffolk, through a criteria-based approach to allow for the

¹⁸ See Appendix 2 for detailed supply data.

¹⁹ See Appendix 2 for detailed supply data

sustainable development of Gypsy, Traveller and Travelling Showpeople pitches/plots. The Councils', as recognised within Policy LP09, and the Councils' Homes and Housing Strategy²⁰, are committed to working with partners across Suffolk to deliver suitable pitches and plots for Gypsy, Travellers and Travelling Showpeople. Furthermore, Neighbourhood plans may also identify policies and allocate sites.

28. Tables 7, 8 & 9 demonstrates that there is already sufficient provision for Gypsy and Traveller pitches in Mid Suffolk, and sufficient Travelling Showpeople plots in Babergh and Mid Suffolk to meet the needs identified by the ANA. An additional Gypsy and Traveller pitch is required in Babergh over the plan period. It is recognised that Gypsy, Traveller, Travelling Show People and Boat Dwellers provision can fluctuate on a regular basis by virtue of its operation, occupation and the lifestyle associated with this development type. The Council expects that the need for one additional Gypsy and Traveller pitch in Babergh, can be met through the development management process, through the application of policy LP09.

Short-stay/transit sites

29. A Suffolk wide need for 2 – 3 short stay stopping sites has been identified through the ANA. The Councils are working collaboratively with neighbouring authorities and partners to meet the needs for short stay stopping sites as demonstrated by the [Ipswich Strategic Planning Area \(ISPA\) Statement of Common Ground V7 \(March 2021\)](#)²¹ (see pages 11-12). Policy LP09 includes consideration of transit pitches.

Planning Policy for Traveller Sites (August 2015) and five-year supply

30. The Planning Policy for Traveller Sites (2015)²² requires local planning authorities to identify sufficient sites to provide 5 years' worth of sites against locally set targets. As demonstrated by Tables 7, 8 and 9, there is a surplus of Gypsy and Traveller pitches in Mid Suffolk, and Travelling Showpeople needs are met in Babergh and Mid Suffolk. It is anticipated that 1 Gypsy and Traveller pitch in Babergh can be delivered through the development management process, through the application of policy LP09.

Boat dwelling need

31. The ANA identified a need of 10 additional moorings in Babergh, between 2016 and 2036 as shown in Table 7 (of this Topic Paper), in addition to 21 existing moorings identified. As identified in paragraph 13.52 of the JLP, the Councils

²⁰ [Core Document Library Reference D23](#)

²¹ Core Document Library Reference ES18.

²² Core Document Library – Document Reference C11

will work with partner agencies to identify suitable moorings to meet the needs identified in an up-to-date needs assessment. Policy LP10 sets out a criteria-based approach to new proposals for moorings, marinas and houseboats.

Relevant policy and evidence

32. The NPPF requires Local Authorities to develop policies based on up to date evidence. The key pieces of evidence base, monitoring and engagement relevant to Gypsies, Travellers and Travelling Showpeople are:

- Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) (May 2017)
- NPPF (section 5, Feb 2019)
- NPPG – Planning Policy for Traveller sites (Aug 2015)
- Continued collaboration via steering groups, Suffolk County Council and partner agencies and the Councils ongoing monitoring of Gypsy and Traveller sites.

Older People and People with Disabilities

33. The NPPF defines older people as “People over or approaching retirement age, including the active, newly-retired through to very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs”²³.

34. The Joint Local Plan identifies ‘A Growing & Ageing Population’ as a key social issue, recognising that as the population ages, there will be different demands on housing, infrastructure, services and facilities. In addition to an ageing population, there is expected to be an increase in people with disabilities over the plan period.

35. The accommodation needs of older people have been assessed through the SHMA, Part 2 (2017)²⁴. Table 6.1a of the SHMA (2017)²⁵ identifies that across the Housing Market Area, there is a proportionately high need for market housing and for social rent / affordable rent amongst this group.

Local context

36. The Babergh and Mid Suffolk’s Joint Homes and Housing Strategy (2019)²⁶ includes strategic objectives, to ensure that:

²³ Core Document Library – Document C19 – Page 69

²⁴ Core Document Library – Document EH02

²⁵ Core Document Library – Document EH02

²⁶ Core Document Library Reference D23

- There is a wide and varied choice of good quality, sustainable homes of different sizes, types, and tenures, to meet the needs of a wide range of different households (Aim 2).
- People live in vibrant and well-connected communities; and homes and communities continue to meet the changing needs of residents (Aim 7).
- Everyone has a suitable home, and residents are able to live as healthily, safely, independently as possible within sustainable communities (Aim 8).

37. The Suffolk Healthy Ageing Needs Assessment (2018)²⁷ identifies that there is expected to be a marked increase in the prevalence of dementia in Suffolk. Policy LP26 of the Joint Local Plan, requires development proposals, where appropriate, to demonstrate that the design follows Dementia-Friendly Design principles²⁸.

38. Policies SP01, SP02, LP06 and LP07 of the JLP requires the mix, type and size of new housing development (including affordable housing) to reflect established needs in the most relevant district needs assessment, or any local housing needs surveys. Additionally, Policies LP06 and LP07 support the provision of specific measures which would suit an ageing population, including the provision of bungalows, supported and special needs housing and accessible and adaptable dwellings.

Identified Supported and Special Housing Needs

39. The identified needs and type of specialist accommodation across Babergh and Mid Suffolk, has been assessed through the SHMA Part 2 (2017), and are demonstrated in Tables 10 and 11 below. For the purposes of the JLP, the need has been annualised and projected to cover the plan period (2018 – 2037).

²⁷ Core Document Library Reference EH04

²⁸ As set out in Dementia and Town Planning (RTPI) Core Document Library – Document Reference D26

Table 10: Babergh - Specialist accommodation required

<i>Type of specialist accommodation</i>	<i>Current profile</i>	<i>Profile 2036</i>	<i>Additional units required (2014 – 2036)</i>	<i>Annualised requirement</i>	<i>Need over Plan period (2018 – 2037)</i>
Sheltered housing	427	1,552	1,125	51	968
Enhanced sheltered housing	0	106	106	5	95
Extra care housing	95	233	138	6	114
Total	522	1,891	1,369	62	1,178

Original Source: Suffolk County Council, 2016, cited in SHMA Part 2 (2017)²⁹

Table 11: Mid Suffolk - Specialist accommodation required

<i>Type of specialist accommodation</i>	<i>Current profile</i>	<i>Profile 2036</i>	<i>Additional units required (2014 – 2036)</i>	<i>Annualised requirement</i>	<i>Need over Plan period (2018 – 2037)</i>
Sheltered housing	874	1,629	755	34	646
Enhanced sheltered housing	29	102	73	3	57
Extra care housing	68.0	244	176	8	152
Total	971	1,976	1,005	45	855

Original Source: Suffolk County Council, 2016, cited in SHMA Part 2 (2017)³⁰

40. In addition to the types of specialist accommodation identified above, the SHMA Part 2 (2017)³¹, identifies that there is a need for 572 additional Registered Care spaces (nursing and residential care homes) in Babergh and 1,004 spaces in Mid Suffolk from 2014 - 2036. When these figures are annualised to cover the JLP plan period (2018 – 2037) it results in an identified need of 494 spaces in Babergh and 867 spaces in Mid Suffolk. Suffolk County Council are currently developing further accommodation typologies to respond to future care needs.

²⁹ Core Document Library Reference EH02 Table 6.2c, Page 183

³⁰ Core Document Library Reference EH02 Table 6.2e, Page 185

³¹ Core Document Library – Document EH02 Pages 183 & 185

41. Sheltered Housing historically was offered to people who were unable to purchase on the open market. However, there has been a shift in new supply for sheltered housing towards owner occupation such as the model of accommodation offered by providers including McCarthy & Stone and Churchill Retirement schemes. One new scheme has been brought forward in Hadleigh, Babergh by McCarthy and Stone for 35 apartments plus 25 assisted independent living bungalows and cottages in 2019.
42. Both Councils have had previous history of enabling supported and specialist housing schemes through direct provision, provision of free land or grant funding to assist delivery. In consideration of any new supported and specialist housing for older people, location will be a decisive factor as well as demonstrated demand.
43. In line with guidance in the NPPG, the SHMA explains that the precise numbers and type of accommodation may depend on changes in patterns of demand and expectations, and therefore should not be considered as too prescriptive. In response to this, Policy LP07 sets out a flexible criteria-based policy to support new supported and specialist housing schemes. This approach which will allow the JLP to respond to the changing nature of need within this category.
44. To ensure that supported and special needs housing is integrated into the community, Policy LP07 requires schemes to be well-designed, within well located areas, have sufficient access to local services and facilities and have a sufficient amenity standards, including access to open space. These measures will also seek to tackle social isolation and loneliness (see paragraph 13.34 of the JLP).
45. Residential annexes can often create a useful facility for the support and care of family members, who may otherwise need accommodation in supported and specialist housing. Policy LP02 sets out a criteria-based policy to support the provision of well-designed residential annexes. Similarly, the provision of M4(2) dwellings, through the application of Policy LP06, (see from paragraph 47 of this Topic Paper) can ensure people remain in their homes, rather than move into specialist care units, as recognised by the PPG Housing for Older and Disabled People.
46. Other evidence informing local housing needs can include evidence produced to support Neighbourhood Plans. Within Babergh and Mid Suffolk Districts, there are numerous Neighbourhood Plans either adopted 'made', or at various stages of plan preparation. These adopted (made) or post-Examination Neighbourhood Plans include policies setting out how these communities will seek to meet these needs locally. The following near-adoption or adopted

Neighbourhood Plans, East Bergholt, Lavenham, Debenham, Fressingfield, Haughley, Mendlesham, Stradbroke, Eye and Woolpit all have relevant context, policy or supporting text to accommodate special and supported housing. Further information on the Neighbourhood Plans across Babergh and Mid Suffolk areas is available on the links below:

[Neighbourhood Planning in Babergh](#)
[Neighbourhood Planning in Mid Suffolk](#)

Building Regulation M4(2) Accessible and Adaptable Dwellings

47. The Building Regulations (2010) Part M include Building Regulation M4(2), which relates to accessible and adaptable dwellings. The purpose of this Building Regulation is to ensure the ease of access to and the use of buildings including facilities for disabled people, as well as the ability to move through a building easily, including facilities within the building. M4(2) does not make a big difference to the aesthetics of a dwelling when compared with Building Regulation M4(1)³², however there are significant long-term benefits to M4(2) from a social, economic and environmental perspective. These include:

- It enables the property to be flexible, adaptable and enabled to changing needs should a persons' physical health deteriorate.
- It extends the length of time someone can stay in their own home, which also helps health and wellbeing.
- It helps to cover any shortfall in existing housing stock for people who need adaptation.

48. Policy LP06 requires 50% dwellings on major developments to meet the M4(2) requirement. Policy LP07 requires all supported and specialist housing to meet the M4(2) requirement. Due to the nature of supported and specialist housing, it is considered appropriate to require a higher percentage of compliance with M4(2) standards when compared to non-specialist housing.

49. PPG states that it will be for Local Planning Authorities to set out how they intend to demonstrate a need for M4(2) dwellings and acknowledges that there are a wide range of official statistics and factors which LPAs can consider.

50. Paragraph 6.19 of the SHMA, Part 2 (2017), states that stakeholders who were consulted with during the production of the SHMA, had identified an ongoing need for easy access housing, to house those with specific disabilities and conditions³³.

³² Building Regulation M4(1) dwellings are categorised as 'visitable dwellings' where reasonable provision should be made for people to gain access to and use the dwelling and its facilities.

³³ Core Document Library Reference EH02

51. Between 2020 and 2035, the population aged 65 and over in Babergh is expected to increase from 24,000 to 32,500 – a 33% increase, and in Mid Suffolk, the population aged 65 and over is expected to increase from 26,200 to 35,400 between 2020 and 2035 – a 35% increase³⁴. Furthermore, the SHMA, Part 2 (2017)³⁵, projects that alongside an ageing population, there is expected to be an increase in people aged 65 or over, who have a limiting long-term illness. The percentage increase in Babergh, and in Mid Suffolk is greater than any other District within the Ipswich HMA between 2015 and 2030.

Table 12: Babergh Number of People with Particular Health Issues

	2015	2030	Change from 2015 - 2030
People Aged 65 and over with a limiting long term illness that limits them a lot	3,806	6,012	+2,206 (57.9%)
People Aged 18-64 with a serious physical disability	1,298	1,288	-10 (-0.7%)
People aged 18-64 with a common mental health disorder	7,846	7,356	-490 (-6.2%)
People with a moderate or severe learning disability (all ages)	329	333	+4 (+1.2%)

Source: Table 6.3, SHMA Part 2 (2017), page 97.

Table 13: Mid Suffolk – Number of People with Particular Health Issues

	2015	2030	Change from 2015 - 2030
People Aged 65 and over with a limiting long term illness that limits them a lot	4,171	6,739	2,568 (+61.6%)
People Aged 18-64 with a serious physical disability	1,485	1,514	+29 (+1.9%)
People aged 18-64 with a common mental health disorder	9,036	8,778	-258 (-2.8%)
People with a moderate or severe learning disability (all ages)	374	391	+17 (+4.5%)

Source: Table 6.3, SHMA Part 2 (2017), page 97.

³⁴ Both assessed using the POPPI Website, March 2021.

³⁵ Core Document Library – Document Reference EH02 – Page 97

52. If the increase in people aged 65 and over with a limiting long-term illness that limits them a lot, is calculated in a pro-rata basis, over the plan period (2018 – 2037), it results in the following:
- Babergh – 2,793 increase
 - Mid Suffolk – 3,252 increase
53. Whilst tables 12 & 13, illustrate that in some categories there is expected to be little change or even a reduction in the number of people with particular health issues, it still demonstrates that the need for accessible and adaptable housing is not limited to people aged 65 and over.
54. Between 2015 and 2018 almost 100 homes in Babergh and 85 homes in Mid Suffolk had adaptations to their homes under the Disabled Facilities Grant³⁶. However, the Disabled Facilities Grant is means tested and is only available in certain circumstances, and therefore underrepresents the actual need for adaptations.
55. During the production of the JLP, the Councils have considered the data within the SHMA, alongside other data identified above, in assessing an appropriate policy requirement for M4(2) provision. Inevitably there will be some overlap in the need for M4(2) dwellings and supported and special housing provision – where policy LP07 requires full M4(2) compliance, which has also been considered. Additionally, some households would rather adapt their existing homes, rather than move homes to accessible and adaptable dwellings. However, the above data demonstrates a significant need for new homes to be adaptable to an ageing population with an increase proportion of health issues.
56. The PPG states that planning authorities should consider the overall impact of M4(2) standards on viability. The impact of M4(2) standards on 50% dwellings on major development schemes has been through the Councils' viability study³⁷.

Bungalows

57. Policy LP06 states that new major housing developments (ten units or more or sites of 0.5ha or more), will be expected to reflect the mix and type (including bungalows) of housing needs identified in the most relevant district needs assessment evidence supported by the respective Council. Any bungalows provided will be required to remain in perpetuity through the removal of permitted development rights as set out in policies LP06 and LP07. The

³⁶ Babergh Homes and Housing Strategy (2019) Core Document Reference D23 - See Page 24

³⁷ Core Document Library – Document Reference D23 – Page 24

provision of bungalows, and the retention of bungalows through the removal of Permitted Development Rights, is considered to be appropriate, to ensure that the JLP can provide and retain a mix of dwellings appropriate to the needs of an ageing population.

Self-Build and Custom Build

58. The Councils maintain a Self-Build Register to understand the level of interest and demand in plots for self-build / custom build across the Districts. As of April 2018, there were 164 people on the Self-Build Register, all with a variety of land and locational requirements.

59. The demand identified over the Joint Local Plan period, as shown in Table 14 below, has been calculated taking the average annual entries received over 4 years to each District Self-Build Register between October 2016 and September 2020. This does not apply a local connection test. Self-build exemptions to the Community Infrastructure Levy currently exceed the demand identified.

Table 14: Self-build demand identified

District	Annual Demand	Demand 2018-2037
Babergh	55	1,045
Mid Suffolk	50	950

60. Policy LP11 sets out that the Councils will support proposals for self-build/custom build housing or proposals that make a proportion of serviced dwelling plots available for sale to self-builders or custom builders on appropriate sites. The Joint Local Plan allocates a range of small and medium sized sites, some of which may be well-suited to self-build and custom builders.

61. The Councils' Homes and Housing Strategy (2019-2024)³⁸ also sets out that the Councils will encourage and support self-build and custom build developers.

Space Standards

62. Policy LP26 of the JLP requires development proposals to meet the space standards as set out in the Governments Technical Housing Standards – Nationally Described Space Standard (2015)³⁹. The Councils note that space standards are due to be incorporated into the General Permitted Development

³⁸ Core Document Library Reference – D23

³⁹ Core Document Library Reference – C10

Order (GDPO). The policy approach seeks to rationalise space standards across all dwellings.

63. The Councils' Viability Study⁴⁰ highlights that affordable units are typically in line with the Nationally Described Space Standards, and as such the Councils consider it important to include the space standards in policy, to ensure that affordable units do not fall below the Nationally Described Space Standards.

⁴⁰ Core Document Library – ER02 – Page 5.7

Appendix 1 – Objectively Assessed Needs Overview

Type of Need	Data Source of Identified Need	Identified Need (2018 – 2037)	Expected Local Plan Delivery & Mechanism for Delivery
Local Housing Need	Standard Method (see pages 1-4 of this Topic Paper and the Spatial Distribution Topic Paper)	Babergh – 7,904 dwellings Mid Suffolk – 10,165 dwellings	Babergh – 9,611 dwellings Mid Suffolk – 12,616 dwellings To be delivered through Policies SP01, SP03, SP04, LP01, Site Allocations (see Spatial Distribution Topic Paper for supply information).
Affordable Housing	SHMA Part 2 Update (2019) ⁴¹ – projected to 2037 <ul style="list-style-type: none"> Table 4.3c, page 27 (Babergh), Table 4.3e, page 37 (Mid Suffolk) (see pages 4 - 7 of this Topic Paper)	Babergh – 2,096 dwellings Mid Suffolk – 2,428 dwellings	Babergh – 2,103 dwellings Mid Suffolk – 3,108 dwellings To be delivered through Policies SP01, SP02, LP06, LP08, the Councils own house building programme, Site Allocations.
Families with Children	SHMA Part 2 Update (2019) ⁴² – projected to 2037 <ul style="list-style-type: none"> Table 4.1c, page 25 (Babergh), Table 4.1e, page 35 (Mid Suffolk) (see pages 7 - 8 of this Topic Paper)	Babergh – 772 families Mid Suffolk – 1,673 families	To be delivered through overall Local Housing Need figures. To be delivered through Policies SP01, SP02, SP03, SP04, LP01, LP06, Site Allocations.

⁴¹ Core Document Library Reference – EH05

⁴² Core Document Library Reference – EH05

Type of Need	Data Source of Identified Need	Identified Need (2018 – 2037)	Expected Local Plan Delivery & Mechanism for Delivery
Older People	SHMA Part 2 (2017) ⁴³ <ul style="list-style-type: none"> Table 6.1a, page 91; Table 6.2c, page 183; Table 6.2e, page 185 (see pages 12 - 19 of this Topic Paper)	Specialist Accommodation: <ul style="list-style-type: none"> Babergh – 1,178 dwellings; Mid Suffolk – 855 dwellings. Registered Care spaces (nursing and residential care homes): <ul style="list-style-type: none"> Babergh – 494 spaces Mid Suffolk – 867 spaces 	To be delivered through Policies LP07, LP06, SP01, SP02 SP03, SP04.
People with Disabilities Need	SHMA Part 2 (2017) ⁴⁴ <ul style="list-style-type: none"> Table 6.3, page 97. (see pages 12 - 19 of this Topic Paper)	Increase in people 65+ with a long-term illness that limits them a lot: <ul style="list-style-type: none"> Babergh – 2,793 increase Mid Suffolk – 3,252 increase 	To be delivered through Policies LP06, LP07, SP01, SP02, SP03, SP04, LP01, LP08.
Student Need	SHMA Part 2 (2017) ⁴⁵ <ul style="list-style-type: none"> Pages 101 - 102 (see page 7 of this Topic Paper)	No specific identified student needs.	Student needs to be met through general housing need. To be delivered through Policies SP01, SP03, SP04, LP06.
Gypsy & Travellers	Accommodation Needs Assessment (ANA) (2017) ⁴⁶ <ul style="list-style-type: none"> Page 117 (Babergh) Page 119 (Mid Suffolk) 	Babergh – 1 pitch Mid Suffolk – 9 pitches	Babergh – 1 pitch Mid Suffolk – 23 pitches To be delivered through Policy LP09

⁴³ Core Document Library Reference – EH02

⁴⁴ Core Document Library Reference – EH02

⁴⁵ Core Document Library Reference – EH02

⁴⁶ Core Document Library Reference – EH03

Type of Need	Data Source of Identified Need	Identified Need (2018 – 2037)	Expected Local Plan Delivery & Mechanism for Delivery
	(see page 9 - 12 of this Topic Paper)		
Travelling Showpeople	<p>Accommodation Needs Assessment (ANA) (2017)⁴⁷</p> <ul style="list-style-type: none"> Page 122 (Babergh) Page 124 (Mid Suffolk) <p>(see page 9 - 12 of this Topic Paper)</p>	<p>Babergh – 0 pitches</p> <p>Mid Suffolk – 7 pitches</p>	<p>Babergh – 0 Pitches</p> <p>Mid Suffolk – 7 pitches</p> <p>To be delivered through Policy LP09</p>
Boat Dwellers	<p>Accommodation Needs Assessment (ANA) (2017)⁴⁸</p> <ul style="list-style-type: none"> Page 127 (Babergh) Page 129 (Mid Suffolk) <p>(see pages 9 - 12 of this Topic Paper)</p>	<p>Babergh – 10</p> <p>Mid Suffolk – 0</p>	<p>Babergh – 10</p> <p>Mid Suffolk - 0</p> <p>To be delivered through Policy LP10</p>
Rented Accommodation	<p>SHMA Part 2 Update (2019) – projected to 2037</p> <ul style="list-style-type: none"> Table 4.3c, page 27 (Babergh) Table 4.3e, page 37 (Mid Suffolk) <p>(See page 8 of this Topic Paper)</p>	<p>Babergh – 2,225 households</p> <p>Mid Suffolk – 2,481 households</p>	<p>To be delivered through general needs housing through Policies SP01, SP02, SP03, SP04, LP01, LP06, LP08.</p>
Self and Custom Build Housing	<p>Council's Self-Build Register (See pages 18 - 19 of this Topic Paper)</p>	<p>Babergh: 1,045 dwellings</p> <p>Mid Suffolk: 950 dwellings</p>	<p>Current self-build exemptions exceed identified need on an annualised basis. To be delivered through LP11, LP01, SP01, SP03, SP04, Site Allocations.</p>

⁴⁷ Core Document Library Reference – EH03

⁴⁸ Core Document Library Reference – EH03

Type of Need	Data Source of Identified Need	Identified Need (2018 – 2037)	Expected Local Plan Delivery & Mechanism for Delivery
Service Families	SHMA Part 2 (Sept 2017) ⁴⁹ <ul style="list-style-type: none"> Page 100 (See Page 8 of this Topic Paper)	No identified need.	No identified target.

⁴⁹ Core Document Library Reference EH02

Appendix 2 – Gypsy and Traveller and Travelling Showpeople Monitoring Data

Babergh Gypsy and Traveller Pitches Monitoring data – January 2020

Application Reference(s)	Address	Parish	Pitches
B/12/00706	Newton Green, Lilleyfields	Newton (JLP page 275)	1
Total number of pitches as at January 2020			1

Mid Suffolk Gypsy and Traveller Pitches Monitoring data – January 2020

Application Reference(s)	Address	Parish	Pitches
1989/10	The Forge, Combs Lane	Stowmarket (JLP page 461)	19
1650/05	Broadgrass, Green formerly Two Oaks, Norton Road	Elmswell/Woolpit (JLP page 503)	18
1772/07, 1036/93, 0156/93, 226/90, 968/92	Kiln Lane	Woolpit (JLP page 503)	5
0047/93, 0048/93, 1150/88	The Gables, Denmark Hill	Palgrave (JLP page 440)	3
0125/90/OL	Oak Lodge, Allwood Green	Rickingham (JLP page 349)	2
OL/0092/92	Crabtree Farm, Norwich Road	Stuston (JLP page 353 & 470)	2
0874/97	Brookdale, Palgrave Road	Thrandeston (JLP page 474)	1
DC/19/01532	The smallholding, Walsham Road	Wattisfield (JLP page 484)	1
0357/90	Two Ways	Hinderclay (JLP page 411)	7
1117/90	Waveney Vale, Norwich Road	Brome and Oakley Parish (JLP page 353 & 470)	3
121/85	Dunroamin, Brockford Road	Wetheringsett Cum Brockford (JLP page 488)	21

Application Reference(s)	Address	Parish	Pitches
DC/17/05336	The Paddocks, Brockford Road	Wetheringsett Cum Brockford (JLP page 488)	1
0548/88	Nags Meadow, Foals Green	Wilby (JLP page 496)	1
305/75, 676/78	Magpie Green	Wortham (JLP page 508)	3
0340/14	Land adjacent to Old White Elms Pub, Low Road	Monk Soham (JLP page 428)	1
Mid Suffolk Supply of Gypsy and Traveller Pitches as at January 2020			88

Babergh Travelling Showpeople Plots Monitoring data – January 2020

None identified.

Mid Suffolk Travelling Showpeople Plots Monitoring data – January 2020

Application Reference(s)	Address	Parish	Travelling Show People Plots
1772/07, 1036/93, 0156/93, 226/90, 968/92	Kiln Lane	Woolpit (JLP page 503)	2
0044/13	Land at Deblyns Walsham Road	Wattisfield (JLP page 317)	1
0357/90	Two Ways	Hinderclay (JLP page 411)	4
Mid Suffolk Supply of Travelling Show People Plots as at January 2020			7

