

HEARING STATEMENT FOR

BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION

MATTER 5: LOCAL HOUSING POLICIES

PERSIMMON HOMES (SUFFOLK) LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Persimmon Homes (Suffolk) Ltd (PHL) in the context of the promotion of Land north east of Frog Hall Lane, Hadleigh and Land east of Longfield Road, Capel St Mary, which is allocated for residential development under Policy LA028 and Policy LA054 respectively of the emerging Local Plan.
- 1.2 This Hearing Statement should be read in conjunction with representations made at previous stages of the Local Plan preparation, including the representations submitted by PHL to the Regulation 19 public consultation on the Pre-Submission Local Plan in December 2020. This Hearing Statement has been prepared following a review of the submitted evidence base. The responses are based on the plan as submitted (A01).

2.0 Matter 5 – Local Housing Policies

5.6 a) Is there robust evidence to justify the requirements of LP06(b)? Is part b) sufficiently flexible and does it take appropriate account of viability?

b) Are the requirements of part (c) clear? Is removal of permitted development rights for bungalows justified?

- 2.1 Criterion a of Policy LP06 contains a requirement for all major housing developments of 10 units or more, or sites of 0.5ha or more, to accommodate 35% affordable housing. The submitted Matter 3 Hearing Statement should be referred to for PHL's concerns regarding the affordable housing requirement, nonetheless the affordable housing provision requirement is adequately outline in Policy SP02 and therefore does not need to be reiterated in Policy LP06.
- 2.2 Criterion b of Policy LP06 requires new major housing developments to ensure 50% of new homes are built to meet the optional requirements for accessible and adaptable dwellings under Part M4(2) of Building Regulations. PHL do not

dispute the importance of an aspiration to ensure existing and new homes are future proofed and able to meet potential changing needs of residents. However, the approach taken in Policy LP06 is not currently justified and is not sufficiently flexible.

- 2.3 Footnote 46 of the NPPF states that the higher optional technical standards for accessibility and adaptability of new homes may be applied if there is a clear and identified need. The PPG also states¹ the clear evidence required to be provided when demonstrating the need to apply higher accessibility standards. The declaration of such a requirement in local policy must therefore be a justified response to meeting the actual future needs of older and disabled residents in the Districts.
- 2.4 PHL considers that criterion b is not based on the appropriate evidence that is required and is thus not consistent with national policy. The SHMA (EH01 and EH02, May 2017) and SHMA Part 2 Update (EH05, January 2019) may be referred to as illustrating that there is the potential for an increasing number of aging residents in Babergh Mid Suffolk. However, this information by itself is not sufficient and cannot be relied upon. It is also not clear how this information has been used to formulate the specific policy threshold of 50% of all new dwellings stated in criterion b rather than taking a more flexible approach.
- 2.5 Furthermore, it has not been made clear whether the Councils have assessed whether the actual needs could be appropriately met by homes built to meet the Part M4(1) Building Regulations standard which is mandatory. Or indeed whether the Councils have taken into account situations where existing homes can be modified as needed to meet the needs of older and disabled people.
- 2.6 **PHL therefore considers that the Councils need to provide further evidence as has been outlined above in support of the Part M4(2) requirement contained in criterion b of Policy LP06.**

¹ Reference ID: 56-007-20150327

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- 2.7 Criterion c of Policy LP06 requires all major housing developments to provide a mix and type of homes that reflects housing needs identified in the most relevant district needs assessment evidence supported by the Councils. The principle of a housing mix needing to reflect the local housing needs is supported, however the policy wording is currently not clear enough. The policy does not state what needs assessment evidence will be supported by the Councils, or how the decision to support will be made. Additionally, the 'most relevant' evidence to be supported by the Councils does not necessarily mean the most up to date evidence would be supported, which would of course not be the most robust evidence on which to base a housing mix.
- 2.8 Furthermore, a district needs assessment is important evidence but is only a starting point in determining the housing mix for a certain site. The policy must be amended to allow additional relevant factors to be taken into account which are just as important and can provide more site specific information than a district-wide needs assessment. These factors include, for example, site viability, sales information, local market signals and site specific opportunities and constraints to which regard must be had when finalising a housing mix. The policy wording must be amended to ensure there is sufficient flexibility to allow all relevant factors to be taken into account.