HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins Homes and Hopkins & Moore (developments) Ltd

In respect of:
Matter 2A Housing Provision

Date:
July 2019

Document Reference:
GA/EW/05017/S0002
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of **Matter 2A Housing Provision** of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 20\(^{th}\) August 2019.

2. ISSUE – IS THE OVERALL STRATEGY AND PROVISION FOR HOUSING DEVELOPMENT EFFECTIVE AND JUSTIFIED?

Question 2.1
The PPG specifically advises that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes (Paragraph: 005 Reference ID: 2a-005-20190220). The Council’s response to my initial questions, calculates the figure of 542 homes per annum needed on this basis, using the latest published affordability ratio. Is this figure justified as the minimum number of homes needed in the Plan area on an annualised basis?

2.1 Following the publication of the 2016-based housing projections (which generally identified much lower housing needs nationwide than the 2014-based projections), the PPG was updated to confirm that the 2014-based household projections should be used as the baseline for the standard method (Paragraph: 005 Reference ID: 2a-005-20190220). This results in a Local Housing Need of 542 dwellings per annum which represents the justified minimum number of homes that need to be planned for in the District.

2.2 However, the 2016-based household projections increased the Local Housing Need for the District to 582 dwellings per annum and it is on this basis that the Plan has progressed. The Council has confirmed in their response to the Inspector’s initial questions their intention to proceed with the higher housing number of 582 dwellings per annum. Whilst this is inconsistent with national guidance, this would best serve to boost the supply of housing and therefore we agree with the housing number, albeit note that this should be interpreted as a minimum.
2.3 It will be necessary to consider the minimum housing requirement in the context of the need to support planned economic development and infrastructure, provide a degree of flexibility in the delivery of sites, account for any future changes in circumstances and meet any unmet needs arising within neighbouring authorities in the Ipswich Strategic Planning Area over the plan period. Specifically, the unmet need of Ipswich Borough currently stands at 1,090 dwellings although the final extent of their shortfall will not be known until the emerging Local Plan has been robustly tested through the examination process for the emerging Local Plan which has yet to reach the Regulation 19 consultation stage.

2.4 We therefore set out in our representations that the housing requirement should be uplifted by at least 20% and accordingly there will be a need for further housing allocations beyond those currently being proposed.

**Question 2.2**

*What implications for the Plan would arise from the use of a housing need figure derived using the 2014 based household projections?*

2.5 Using the 2014-based projections would reduce the minimum number of homes required to 542 dwellings per year over the plan period which would give the Council a greater degree of contingency but would not be consistent with national planning policy to boost the supply of housing.

**Question 2.3**

*The Plan seeks to provide for a contingency above the minimum housing need requirement. What is the overall provision for contingency (including the windfall allowance and contributions from Neighbourhood Plans) proposed and is it justified?*

2.6 The contingency figure only represents a buffer of 8.5% (approximately 890 dwellings) above the standard methodology before an allowance for windfall is factored in. As previously confirmed, it is considered more appropriate that a 20% uplift to the housing figure is applied to boost the supply of housing and support planned economic development and assist in meeting unmet needs of Ipswich.

**Question 2.4**

*Does Policy SCLP2.1 serve a clear purpose and would it be effective?*

2.7 Whilst the commitment to ‘contribute to’ the collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area is supported, it does not provide the necessary guarantees that Suffolk Coastal will assist in meeting any shortfall in the needs of the other Ipswich Strategic Planning Area authorities that may arise during the plan period, specifically that of Ipswich.
2.8 It is considered that given the emerging unmet need for Ipswich and the requirements of the NPPF, there exists the opportunity now for Suffolk Coastal, as the most sustainable and deliverable location in the housing market area to accommodate Ipswich’s unmet need. Accordingly, the housing target for Suffolk Coastal should be elevated.

**Question 2.5**
**Does the Plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework?**

2.9 Please refer to our Hearing Statement on behalf of Hopkins Homes to Matter 4 Policies (Policy SCLP5.8 Housing Mix) which demonstrates that the Council’s approach to meeting the housing needs of the elderly is deeply flawed. The Council has forecast the need for housing for older people, but not considered in any depth how this need should best be met. There has been little regard paid to the type of dwellings needed and almost no provision made for specialist accommodation (i.e. sheltered housing, enhanced sheltered housing and extra care housing).

**Question 2.6**
**Will there be a five year supply of deliverable housing sites on adoption of the Plan?**

2.10 No comment.

**Question 2.7**
**Given historic levels of housing completions in the Plan area, are numbers of units to be built envisaged per annum realistic and achievable?**

2.11 The Council’s latest Annual Monitoring Report 2017 - 2018 (March 2019) confirms the number of annual housing completions against the current Core Strategy annual requirement of 465 dwellings. Whilst it can be seen to be reducing year on year, it is clear that has been past under delivery of housing. Given the historic levels of completions therefore it will be important to maintain a good supply of homes across the District to ensure that there is sufficient flexibility. This further compounds the necessity for a buffer of 20%.
<table>
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<th>Monitoring year</th>
<th>Net dwelling completions (annual delivery against requirement of 465 dwellings)</th>
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**Question 2.8**

**Is the rate of delivery envisaged for the proposed allocations as set out in the trajectory realistic and justified?**

2.12 Hopkins Homes have prepared separate Hearing Statements in respect of the following proposed site allocations which provide commentary on the deliverability of each. In summary, subject to the changes to the policies suggested, the sites are considered to deliverable options for housing development. Hopkins Homes are the largest independent provider of housing in District and have a proven track record of delivering high quality housing on a range of sites. Hopkins Homes are committed to bringing the allocated sites forward at the earliest opportunity to enable the delivery of a sustainable development and the provision of significant economic, social or environmental gains for the area.

2.13 With reference specifically to the Local Plan trajectory contained in Appendix D which provides a breakdown of the anticipated delivery from the plan’s proposed allocations, Hopkins Homes make the following observations:

- **Policy SCLP12.29 South Saxmundham Garden Neighbourhood** – The trajectory suggests that the site, which is allocated for 800 dwellings, will not deliver within the 5 year period and that the first delivery of 50 dwellings is expected to commence until 2023/24. As fully detailed in the accompanying Hearing Statement, as drafted the policy is not considered to be deliverable in its entirety by reason of the inclusion of land promoted by Hopkins Homes as formal/informal open space (SANG) which would fail to be brought forward for such and therefore the allocation would not be able to deliver the quantum of development envisaged, it being served by insufficient
SANG. The changes to the policy suggested by Hopkins Homes would however enable circa 200 dwellings to be delivered as a first phase in the early part of the Plan period and within the first 5 years.

- **Policy SCLP12.33 Woodbridge Town Football Club** – The trajectory suggests that the site, which is allocated for 120 dwellings, will not deliver within the 5 year period and that the first delivery of 40 dwellings is not expected to commence until 2025/26. It is assumed that this delivery rate is on the basis of the policy’s current requirement for housing development to be associated with the relocation of the football club within the town. In this regard, the accompanying Statement of Common Ground prepared between Hopkins Homes, East Suffolk Council and Woodbridge Town Football Club confirms changes to the policy to allow for replacement sites to be located outside the town and a criteria based approach against which a suitable relocation site would be assessed to provide further certainty. On this basis it is expected that the site can come forward for residential development in the early part of the Plan period and within the first 5 years.

- **Policy SCLP12.49 Land North of The Street, Darsham** – The trajectory suggests that the site, which is allocated for 25 dwellings, is not expected to commence delivery until 2021/22. As fully detailed in the accompanying Hearing Statement, Hopkins & Moore (Developments) Ltd has demonstrated their commitment to bringing the site forward in the short term through the submission of a full planning application on the site in April 2019 (DC/19/1462/FUL) and as such it is considered that the site can deliver much earlier in the 5 year period than suggested.

- **Policy SCLP12.50 Land off Laxfield Road, Dennington** – The trajectory suggests that the site, which is allocated for 50 dwellings, is not expected to commence delivery until 2022/23. Hopkins & Moore (Developments) Ltd is committed to bringing the site forward at the earliest opportunity and as such it is expected that the site can be delivered in the early part of the Plan period and within the first 5 years.

- **Policy SCLP12.52 Land West of Chapel Road, Grundisburgh** – The trajectory suggests that the site, which is allocated for 70 dwellings, is not expected to commence delivery until 2022/23. Hopkins & Moore (Developments) Ltd is committed to bringing the site forward in the short term and are preparing a full planning application for submission in due course. As such it is considered that the site can deliver much earlier in the Plan period than suggested and within the 5 year period.

- **Policy SCLP12.54 Land North of The Street Kettleburgh** – The trajectory suggests that the site, which is allocated for 16 dwellings, is not expected to commence delivery until 2021/22. As detailed in the accompanying Hearing Statement, Hopkins & Moore (Developments) Ltd has
demonstrated their commitment to bringing the site forward in the short term through the submission of a pre-application request in June 2019 and as such it is considered that the site can deliver much earlier in the 5 year period than suggested

- **Policy SCLP12.61 Land between High Street and Chapel Lane, Pettistree** – The trajectory suggests that the site, which is allocated for 150 dwellings, is not expected to commence delivery until 2023/2024. As fully detailed in the accompanying Hearing Statement, the site is considered to be deliverable for 120 dwellings. Hopkins Homes are committed to bringing the site forward in the short term and are preparing a full planning application for submission towards the end of 2019. As such it is considered that the site can start to deliver in the year 2020/2021 for 25 dwellings with 50 dwellings thereafter delivered in years 2021/2022 and 2022/2023.

**Question 2.9**

The housing trajectory assumes provision of 50 dwellings per annum by way of windfalls. What is the justification for this figure and is it realistic for the duration of the plan period?

2.14 Paragraph 70 of the NPPF identifies that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply and that any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

2.15 There appears to be no evidence to demonstrate that these rates have the ability of being achieved over the plan period and the Council has sought to continue to rely on the windfall provision of 50 dwellings per annum as identified in the Core Strategy.

2.16 In recent years the windfall figures have been much higher and include a significant yield from sites which have come forward on the back of the Council being unable to demonstrate an adequate five year housing land supply. This is now likely to decline following the adoption of allocations within a new Local Plan and there is no guarantee that such sites will continue to provide a reliable source of housing supply.

2.17 As such the Council should not rely on windfall provision but should instead seek to allocate more land to deliver as much of the housing requirement as possible to provide greater certainty.