Suffolk Coastal Local Plan Examination

Note on proposed modifications to SCLP5.8 Housing Mix

1. This note responds to the Inspector’s post hearings letter dated 31st January 2020 and also the Inspector’s comments within the first review of the table of modifications that has been prepared by the Council to identify amendments to the plan.

2. Following the hearing session on Wednesday 18th September 2019 on Matter 4 Policies the Council submitted a note to the Inspector proposing modifications to policy SCLP5.8 Housing Mix (Note on Policy SCLP5.8 Housing Mix, Document J13), which included modifications to paragraph 2 as set out below:

“Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1, and should provide for at least 40% to be 1 or 2 bed properties, unless it can be satisfactorily demonstrated that this is unfeasible.”

3. The Inspector’s post hearings letter states that it is considered that the policy is over prescriptive in this regard and that the wording of paragraphs 1 and 2 should be as follows:

“Proposals for new housing development will be expected to reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council.

Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1, and should provide for at least 40% to be 1 or 2 bed properties.”

“Proposals for new housing development will be expected to deliver the housing needed for different groups in the community as identified in the latest Strategic Housing Market Assessment. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 or 2 bedrooms).”

4. The Council has separately responded to the Inspector’s letter in relation to housing for older people and has in doing so proposed modifications to Policy SCLP5.8 including to specifically refer to how the housing needs of older people will be addressed.

5. The Council has considered the Inspector’s proposed wording but would suggest that text would imply that a future Strategic Housing Market Assessment would be produced. The 2019 National Planning Policy Framework does not use the term Strategic Housing Market Assessment and the Council suggests that the words ‘latest equivalent assessment’ would better capture any future
reviews. In view of other proposed modifications to Policy SCLP5.8 the Council would propose setting out the two sentences separately in the policy as shown below.

6. In view of the modifications proposed below to Policy SCLP5.8 further modifications are also proposed to paragraph 5.40 which in the Final Draft Local Plan sets out potential other sources of information which would demonstrate local housing needs, and to paragraph 5.46 which reflected the requirement for proposals of 5 or more dwellings to provide for a mix of house types and sizes.

7. Modifications are shown in strikethrough for deleted text and in underline for additional text. The Council will include these revisions in the schedule of modifications that has been collated as part of the Examination.

Modifications to Policy SCLP5.8:

“Proposals for new housing development will be expected to reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council.

Proposals for 5 or more units should provide for a mix of sizes and types based upon table 5.1, and should provide for at least 40% to be 1 or 2 bed properties.”

“Proposals for new housing development will be expected to deliver the housing needed for different groups in the community as identified in the Strategic Housing Market Assessment, or latest equivalent assessment.”

“New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms).”

Modifications to paragraph 5.40:

“There may be circumstances where there is other evidence of local housing needs which may include the Housing Register or a housing needs survey carried out by a Town or Parish Council, Neighbourhood Plan group or other organisation, however this would be and this may form a material consideration to be considered alongside the conclusions of the SHMA which sets out the need at the District level. Any alternative assessment of local need would need to be viewed in the context that new housing development is contributing to the District wide need and not just to the needs of the Town or Parish where the development is proposed.”

Modifications to paragraph 5.46:

“To achieve a greater mix of housing types, the starting point will be that all developments of 5 or more residential units will be expected to provide a mix of house types and sizes. The Council will
expect applicants to relate needs to the SHMA and/or to an assessment of local need where the methodology and scope for this is agreed with the Council."

Note – the full text of Policy SCLP5.8 including supporting text showing all proposed modifications is also provided as a separate document for clarity.