Suffolk Coastal Local Plan Examination

Policy SCLP5.8 Housing Mix

This note accompanies the following notes, which have been produced in response to the Inspector’s letter dated 31st January 2020:

- Note on Housing for Older People (Policies SCLP5.8, SCLP5.10 and SCLP5.11)
- Note on Accessible Housing (Policy SCLP5.8 Housing Mix)
- Note on Housing Mix (Policy SCLP5.8 Housing Mix)

This note sets out the consolidated proposed modifications to Policy SCLP5.8 Housing Mix and associated supporting text for clarity and should be read alongside the notes listed above. The consolidated version also captures any other modifications put forward through Hearings Statements and Notes and which have not been superseded by modifications proposed in the Notes listed above.
Housing Mix

5.36 In addition to ensuring a supply of housing land, it is also necessary to ensure that the right size, type and tenure mix of housing built is delivered. The National Planning Policy Framework requires planning authorities to identify the size, type and range of housing required and, furthermore, the National Planning Practice Guidance states that once identified, the housing need should be broken down by household size and type. Specifically, the National Planning Policy Framework requires local planning authorities to plan for a mix of housing including the needs of families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes.

5.37 The Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (2017) (SHMA) is a key piece of evidence which identifies the needs for mix and type of housing across the District to 2036.

5.38 The SHMA provides conclusions on the size of property needed in each tenure for the District as a whole, and this part of the SHMA has been updated in 2018 2019 to reflect the disaggregation of the housing need figure calculated using the national standard methodology. Evidence shows that this varies between tenure, but that overall there is a need for all sizes of property and that across all tenures there is a need for at least 40% to be 1 or 2 bedroom properties. Consultation feedback suggests a relatively high level of demand for smaller properties, particularly those to meet the needs of first time buyers or those looking to downsize. At present, around 30% of all properties in the District are 1 or 2 bedrooms, and therefore the need for 40% of new dwellings over the Plan period should not be underestimated. To ensure that smaller properties are delivered, and in particular recognising the issues around affordability and the potential demand for properties for downsizing due to the ageing population, a particular focus on smaller properties has been identified. Policy SCLP5.8 includes a requirement for at least 40% of new dwellings to be 1 or 2 bedroom properties. It should be noted that the requirements in Table 5.1 below relate to District level need. It is acknowledged that, depending on the character of the surrounding area, some sites may present a greater opportunity to secure smaller properties and consideration will therefore be given to surrounding densities and character in this respect.

Table 5.1 District-wide housing need by size, source: Strategic Housing Market Assessment Part 2 (Update 2018 2019)

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>Percentage of District wide need1</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>12%</td>
</tr>
<tr>
<td>2</td>
<td>29%</td>
</tr>
<tr>
<td>3</td>
<td>27%25%</td>
</tr>
<tr>
<td>4+</td>
<td>33%</td>
</tr>
</tbody>
</table>

5.39 In Suffolk Coastal District the number of households in private rented accommodation has increased by 35% between 2001 and 2011. Whilst this increase is lower than that of surrounding authorities, it

1 Note, figures do not sum to 100% due to rounding
nevertheless highlights a growing need for rental properties. The SHMA concludes that 16% of housing need to 2036 is for private rented properties.

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.

5.41 The SHMA highlights that within the Ipswich Strategic Planning Area the population of those aged over 65 is projected to increase by 57.8% / 46.3%, between 2014-2036 and 2036. The East Suffolk Housing Strategy recognises that there are an increasing number of older people living in housing that is too large or is not suited to their mobility needs. It states that there is a need for more housing to be adapted to make it accessible and for more specialist housing for older people, including higher level support for people with severe mobility problems, chronic physical health conditions and dementia. The development of new housing provides an opportunity to design-in such considerations. Provision of smaller, more suitable, accommodation may result in more of the existing larger properties becoming available.

The Local Plan seeks to address the housing needs of older people in a number of ways. Whilst the unrestricted existing housing stock, in practice, forms part of the supply of future housing for older people the Plan recognises that due to the increasingly ageing population there is a need to ensure that new development provides for housing that will more specifically meet the needs for accommodation for older people. By 2036 it is projected that there will be 40,916 older person households (gross) in the Suffolk Coastal area. The types of accommodation needed for older person households, derived from the Long Term Balancing housing Markets model and Strategic Housing for Older People tool as referenced in the SHMA, are set out in Table 5.2 below. It is evident that the majority of older people will require general housing.

*Table 5.2: Type of accommodation required for older person only households in Suffolk Coastal in 2036 (gross)*

<table>
<thead>
<tr>
<th>Size of home</th>
<th>Market</th>
<th>Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>General housing</td>
<td>Sheltered housing</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>3,163</td>
<td>1,269</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>8,177</td>
<td>224</td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>15,690</td>
<td>-</td>
</tr>
<tr>
<td>4+ bedrooms</td>
<td>3,817</td>
<td>-</td>
</tr>
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</table>
In reflection of the extent of need for older persons accommodation, policy SCLP5.8 references that housing development over the plan period will contribute to the significant need for accommodation for older people and that all housing development of ten or more dwellings should demonstrate how it will contribute to meeting the needs of older people. It is acknowledged that on smaller sites (below 50 dwellings) the provision of specialist accommodation (sheltered and extra care) is less likely to be feasible and the Council would therefore expect that the needs for older persons housing to be addressed through provision of M4(2) and M4(3) housing and other forms of housing as set out in paragraph 5.44, as part of the housing mix. On larger sites (of 50 or more dwellings) the Council would expect that, in meeting this policy requirement, consideration is given to needs for specialist housing and that this is addressed where feasible.

Reflecting the opportunities provided by sites to deliver on the wider objectives set out in paragraph 5.45, a number of site allocations within the Local Plan contain a policy criteria specifying that the mix of housing provided should include housing to meet the needs of older people. It is expected that development coming forward on these allocations would, as an integral part of the development, include housing such as the types set out in paragraph 5.44 below and on larger allocations would consider and address needs for specialist accommodation where feasible as part of this requirement.

The allocations which contain a specific requirement to include housing to meet the needs of older people are:

- SCLP12.3 North Felixstowe Garden Neighbourhood
- SCLP12.4 Land North of Conway Close and Swallow Close, Felixstowe (includes a specific reference to bungalows)
- SCLP12.5 Land at Brackenbury Sports Centre
- SCLP12.29 South Saxmundham Garden Neighbourhood
- SCLP12.33 Land at Woodbridge Town Football Club
- SCLP12.44 Land South of Forge Close between Main Road and Ayden, Benhall
- SCLP12.47 Land behind 15 St Peters Close, Charsfield (includes a specific reference to bungalows)
- SCLP12.50: Land off Laxfield Road, Dennington
- SCLP12.51: Land to the South of Eyke CoE Primary School and East of the Street, Eyke
- SCLP12.52: Land to the West of Chapel Road, Grundisburgh

<table>
<thead>
<tr>
<th>Total in households</th>
<th>30,847</th>
<th>1,493</th>
<th>270</th>
<th>4,907</th>
<th>814</th>
<th>220</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential care</td>
<td>1,618</td>
<td></td>
<td></td>
<td>747</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
• SCLP12.58: Land North of Mill Close, Orford (includes specific reference to bungalows)
• SCLP12.59: Land adjacent to Swiss Farm, Otley
• SCLP12.61: Land between High Street and Chapel Lane, Pettistree
• SCLP12.66: Land adjacent to Reeve Lodge, High Road, Trimley St Martin
• SCLP12.69 Land West of B1125, Westleton

5.42 The SHMA includes an assessment of the needs for specialist accommodation for older people (sheltered housing, enhanced sheltered housing and extra care housing) and identifies a need for a total of 1,287 units by 2036. The SHMA also identifies a need for a further 1,118 spaces in Registered Care (nursing and residential care homes) over the plan period. These needs are set out in Table 5.3 below, and have been further disaggregated between market and affordable needs.

Table 5.3: Net need for specialist accommodation in Suffolk Coastal (2016 – 2036)*

<table>
<thead>
<tr>
<th></th>
<th>Market</th>
<th></th>
<th>Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Residential care</td>
<td>Sheltered housing</td>
<td>Enhanced sheltered/ Extra care housing</td>
</tr>
<tr>
<td>Number of units</td>
<td>694</td>
<td>891</td>
<td>247</td>
</tr>
</tbody>
</table>

*Note that figures may not sum due to rounding

However traditional forms of provision may not always match modern demands and although the specialist housing market sector addresses a wide variety of needs it is considered that some of this need will be met through the provision of non-specialist housing, and therefore it is important that the mix of housing helps to address these needs. Provision for sheltered and extra care housing and registered care will be secured through larger residential allocations where feasible, as part of a mix of housing types.

It is expected that the two Garden Neighbourhoods, which form a central part of the strategy of the Local Plan, will deliver an element of specialist housing through reference in the policies to the provision of housing to meet the needs of vulnerable people. Land is also allocated under policy SCLP12.27 Land rear of Rose Hill, Aldeburgh for the development of a care home alongside residential dwellings. Policy SCLP5.8 supports the provision of sheltered and extra care housing where this incorporates a mix of tenures to meet an identified need. Policy SCLP5.11 Affordable Housing on Exception Sites also provides opportunities for the delivery of affordable specialist accommodation on sites outside of but adjacent or well related to Settlement Boundaries.

5.43 In 2015, the Government introduced two new ‘optional’ Building Regulations standards relating to accessible dwellings, which set standards in relation to accessible and adaptable dwellings (Part M4(2))
and wheelchair accessible dwellings (Part M4(3)) which are over and above the minimum requirements\(^2\). Local authorities can apply these optional standards by incorporating a requirement within their planning policies. The SHMA identifies that there will be an increase of 3,120 people over 65 in Suffolk Coastal with a limiting long term illness by 2030. Considered alongside the number of adaptations made annually to the existing stock\(^3\) and the scale of projected growth in population aged over 65, it is considered that there is a clear need for a significant proportion of new dwelling stock to be built to higher accessible and adaptable standards. Such dwellings are not only beneficial to older people but may also help to meet the needs of other groups for example families with young children. Alongside expecting developments of 10 or more non-specialist dwellings to demonstrate how needs for older people are met, the policy therefore requires at least 50% of dwellings in developments of 10 non-specialist dwellings or more to meet the requirements of Part M4(2). This includes developments incorporating specialist and non-specialist dwellings where 10 or more non-specialist dwellings are proposed. In recognition of the types of needs being met by specialist accommodation, the policy expects that all specialist accommodation would meet the requirements for M4(2) dwellings. Whilst the Council will support the development of dwellings built to the wheelchair accessible standard, a requirement for these will not be set as the needs for them will be specific to individual circumstances. This approach also supports the Joint Health and Wellbeing Strategy for Suffolk which identifies the provision of greater choice and innovation in housing for those with disabilities as one of its priorities, and the East Suffolk Housing Strategy which identifies a need for more accessible accommodation.

5.44 In addition to specialist accommodation, there is a range of types of housing that may be particularly well suited to the older population, but which may also help to improve choice in the housing stock across the District more generally. The Council will support innovative schemes which seek to create integrated communities and will expect developers to consider whether such types of housing would be feasible depending on the site size and location. Examples of housing types and design which may contribute to providing a mix of housing choices for older people could include those set out below, however it is not the intention that these would routinely be limited to occupation by older people and they may also suit the needs of others. Types of housing which could be suitable for older people include:

- Almshouses – housing provided by charities at a low rent, usually for older people;
- Cohousing – community led schemes whereby residents share some spaces / facilities;
- Bungalows/level access homes, including dormer bungalows provided there is adequate living accommodation (i.e. bedroom(s) and bathroom(s)) on the ground floor;
- Smaller properties, but which have larger than standard living and storage space;
- Provision of shared or smaller garden/outdoor spaces.

5.45 Opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example older persons housing on

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\(^2\) Part M4(2) and Part M4(3) are references to the relevant Building Regulations Approved Documents.

\(^3\) Part 2 of the Strategic Housing Market Assessment shows this to be around 100 per year on average over the past five years, and is consistently higher than the other authorities.
sites that are well related to schools, community centres or other focal points can help to create integrated communities. The Suffolk Healthy Ageing Needs Assessment (2018) identifies tackling social isolation and loneliness as one if its recommendations. There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car.

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.

5.47 To ensure that the size of dwellings appropriately reflects the needs identified, the Council will consider the number of rooms and layout of dwellings proposed in determining the number of rooms that could be used as bedrooms.

5.48 Neighbourhood Plans may wish to identify specific localised needs for certain types of dwellings where supported by evidence gathered through a local housing needs assessment which is supported by the Council. There are also other or complementary mechanisms in which communities can deliver the homes needed in the local community, for example through the establishment of a Community Land Trust.
Policy SCLP5.8: Housing Mix

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).

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.

To contribute towards meeting the significant needs for housing for older people, proposals for ten or more dwellings should demonstrate how the development will contribute to meeting the needs of older people.

On proposals of 10 units or more non-specialist dwellings at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. All specialist dwellings will be expected to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. Only in exceptional circumstances would a lower percentage of M4(2) dwellings be permitted. In such circumstances applicants would need to demonstrate that provision is either unfeasible or unviable and that the development incorporates alternative measures to enhance accessibility and adaptability where possible.

Sheltered and extra-care housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need.

Neighbourhood Plans may set out an approach to housing type and mix specific to the local area where this is supported by evidence.