



Babergh Mid Suffolk SPD Draft – Housing

Pigeon Comments – June 2024

Section	Paragraph	Comments
Approach to Open Market Mix	2.1.5	<p>Paragraph 2.1.5 states that the “Ipswich Strategic Housing Market Assessment (2017 with a partial update in 2019) (‘SHMA’) currently represents the relevant District-wide assessment. The SHMA sets out, in Part 2, the district-wide requirements for different unit sizes of open market homes in respect of bedrooms” which is then listed in a table.</p> <p>Although, the SHMA may present an appropriate ‘starting point’, given its age (it is now 5 years old) and the fact that it represents a snapshot in time, we would suggest that it is inappropriate to use this as the basis for an overly prescriptive housing mix requirement. The SPD should provide suitable flexibility to allow housing mix to be agreed on a site-by-site basis taking into account all requirements, including the site’s context.</p> <p>Furthermore, we would suggest that the Council provides information on when the evidence base will be refreshed, given the date of the SHMA, which was published in 2019. Although it should be noted that any guidance on housing mix will need to provide sufficient flexibility given the time limited nature of any housing market/needs assessment and the likelihood that this will change over time.</p>
Preferred Affordable Housing Mix	2.2.9	<p>Paragraph 2.2.9 says that “The Councils’ current preferred tenures to be secured via planning obligations are affordable rent and shared ownership, which the SHMA has identified as being the most needed tenures in the Districts. Units delivered at a social rent (as opposed to an affordable rent) will be considered a benefit but will not necessarily be accepted if the tenure proposed is to the detriment of the total number of affordable homes on a given site.”</p> <p>We would suggest that this requires further clarification as the guidance as currently drafted is unclear as to what the Councils’ preferred tenures are. Currently, it says that affordable rent and shared ownership are preferred yet it says that social rent will be considered a benefit.</p>



		Notwithstanding, it is important that the SPD allows for the full range of affordable tenures as set out in the NPPF.
Preferred Affordable Housing Mix	2.2.10	<p>Paragraph 2.2.10 describes the Council's preference of agreeing "an affordable housing mix before an application is submitted, via pre-application advice." While we would typically seek pre-application advice before submitting an application, we do not consider that this should be a mandatory requirement, as draft para 2.2.10 implies.</p> <p>It should also be noted that there will be instances where the affordable housing mix is not a consideration, for example, an outline application where the housing mix is not being determined.</p>
Preferred Affordable Housing Mix	2.2.15	In Paragraph 2.2.15 the Councils state that "early consultation with Housing Officers is strongly recommended so that affordable housing requirements can be established as part of the formal pre-application process." Whilst we would typically engage with the Councils Housing Officers at the pre-application stage, as per our comments in respect of 2.2.10. this should not be a mandatory requirement, particularly where housing mix is not being determined, as is the case with an outline application.
Exceptional Circumstances – Viability	Whole Section	<p>We suggest that the SPD should include an affordable housing cascade mechanism as an option. This should include the steps that the Council will require applicants to take where there is no interest from a Registered Provider. This should include the process for agreeing an alternative tenure split with the Council and in the event that there remains no interest from a Registered Provider, the ability for affordable homes to be delivered as market homes with a commuted sum payable to the Council. The SPD should include the level of contribution for different sizes and tenure of affordable housing (which may be index linked) to avoid the requirement for site specific valuation.</p> <p>While this may only be required in exceptional circumstances, we consider that it is important to include such a mechanism to ensure the delivery of new homes across the District and to avoid unnecessary delays in the event of changes to market conditions and/or national planning policy.</p>
Integration of affordable housing within development	2.2.24	<p>Paragraph 2.2.24 lists the requirements for how the Councils want affordable housing to be integrated.</p> <p>Part (iii) states that "affordable housing is not to be clustered in less desirable parts of the sites". While the</p>

		<p>desirability of different parts of a site could be open to interpretation and therefore present difficulties in the application of this requirement, we would suggest that, if retained within the SPD, this requirement needs to allow for some level of flexibility.</p> <p>For example, if there are clearly defined less desirable parts of a site, this has the potential to impact on scheme viability, which in turn could prejudice the ability of a scheme to deliver affordable housing or other scheme benefits, such as community infrastructure. We would therefore suggest that this should be considered on a site-by-site basis taking into account all considerations and aspects of a scheme, in order to avoid prejudicing affordable housing and scheme delivery.</p> <p>Similarly, we suggest that part (iv), which refers to limiting clusters of affordable homes to 15, should be less prescriptive to allow consideration of appropriate cluster sizes on a site-by-site basis. Whilst we fully support the creation of mixed and balanced communities, in the absence of evidence that clusters of more than 15 affordable homes are the cause of problems within the districts, there is a need for greater flexibility and a more nuanced approach. There are number of factors that need to be considered, including urban design (for example, the need to create a gateway feature, which may be more suited towards the affordable housing mix), a Registered Provider’s management requirements, as well as the phasing of a scheme, where clusters of more than 15 affordable homes could result in earlier delivery of affordable housing.</p>
Strategic Policy 04 (SP04) – Provision for Gypsy and Traveller and Travelling Showpeople	2.3.2	We would suggest that the SPD includes further guidance on when the Councils Evidence Base will be updated, and if possible, clarity on what the Councils are going to update in particular.
2.9.4	Local Policy 08 (LP08) – Self-Build and Custom Build	<p>Referring to self and custom build, paragraph 2.9.4 states that “following the introduction of this test, the Councils will only consider demand arising from Part 1 of the registers when determining whether sufficient planning permissions have been granted for the purposes of the Self-build and Custom Housebuilding Act 2015. Part 2 of the registers will be used for considering the Councils’ other duties under the Act.”</p> <p>Whilst we acknowledge that this is in line with the Planning Practice Guidance (PPG) and agree with the principle of prioritising people who pass the local connection test, we recommend that the Councils also</p>



		consider the demand arising from Part 2 of the register as this still constitutes legitimate demand for custom/self-build homes in the districts.
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