

17 June 2024

Strategic Planning Policy Team  
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Dear Sir / Madam,

Draft Housing SPD Consultation – June 2024

Thank you for the opportunity to comment on the above consultation on the Draft Housing Supplementary Planning Document (SPD) (May 2024) as proposed by Babergh and Mid Suffolk District Councils. These representations have been prepared by Pegasus Group on behalf of developer Ballymore Group and landowner and option holder Mr Price, with complete interests in the Land South of Pond Hall Road, Hadleigh.

These representations provide comment on various elements of the Draft SPD. These are provided below and broadly follow the structure of the SPD. Where relevant, SPD paragraph references have been stated.

Strategic Policy 01 (SPO1) – Housing Needs

The Ipswich Strategic Housing Market Assessment (SHMA) referred to in Section 2.1 was prepared seven years ago. The update in 2019 took into account more recent data in some respects, but did not constitute a full review. This is therefore a dated evidence base, and should be treated as such; actual need and demand will have moved on since the SHMA was prepared due to significant changes in circumstances arising from the coronavirus pandemic and the cost of living crisis. This has all had an effect on housing needs and demand.

In addition, the SHMA is a district-wide assessment of need, and therefore does not take into account localised factors. Site specific and local market factors play an important part in informing the final housing mix for a site. It is reassuring that the SPD confirms the SHMA will be treated as the starting point for determining housing mix, however the deficiencies in the SHMA as an evidence document should be properly recognised.

Paragraph 2.1.10 states that Housing Needs Surveys (differing from the district level assessments) should be based on need not demand. Need is determined by household sizes, mobility, age etc.,

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whilst demand is driven by the market. The SPD should thus recognise that a landowner, land promoter, housebuilder or developer's knowledge of the local market will also play an important role in determining what the appropriate open market housing mix is for a site. This will allow the latest housing need data to be considered, as well as local market factors rather than relying on a housing mix that is based on district-wide data and relates to a specific point in time.

The need for a condition, as suggested by paragraph 2.1.14, to be attached to outline permissions requiring consideration of an appropriate open market mix is questioned. Housing mix forms part of the details that would need to be considered as a Reserved Matter in any event, reinforced by criterion 3 of Policy SPO1. As dictated by national planning guidance, planning permissions should not be subject to unnecessary conditions. This paragraph should be deleted.

### Strategic Policy O2 (SPO2) – Affordable Housing

The points made above regarding the datedness of the SHMA applies to affordable housing mix as well particularly given that the delivery of affordable housing has fallen well short of the required provision (25% of the requirement in the monitoring year 2022/23). The matter is further exacerbated by falling grant levels which in turn impacts on the financial viability of certain affordable housing tenures.

Policy SPO2 states that affordable housing mix can be informed by 'any local housing needs survey and other relevant supporting evidence'. The draft SPD deals with housing needs surveys, but does not refer to other relevant supporting evidence such as that outlined above. This could be evidence provided by a developer or Registered Provider based on their own knowledge of the market and the local area. The draft SPD should provide this clarification. Any evidence that is expected should be reasonable and proportionate.

It is noted that paragraph 2.2.10 and 2.2.15 states the affordable housing mix is to be agreed at pre-application stage, through consultation with the Housing Officer. To enable this, the Housing Team should be clearly offered as a potential consultee when a pre-application enquiry is made. This is currently not the case.

Paragraph 2.2.9 states 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. The provision of First Homes is not covered. The proposed affordable home ownership tenure should allow for at least 25% of the affordable housing provision to be comprised of First Homes, to be in accordance with current national planning guidance. This is important to consider now to ensure the delivery of shared ownership tenure homes is not affected, which as noted at paragraph 3.3.4, is the preferred tenure of affordable housing provision.

Paragraph 2.2.24 requires affordable housing clusters of no more than 15 dwellings to be provided and with 1 beds to be in no more than 6 unit groups. The requirement for specific cluster sizes is questioned, given that Policy SPO2 already requires affordable housing to be 'integrated within the development'. Should the Councils have wished to make this more onerous, this should have been thoroughly tested through the Local Plan process by specifying a cluster size in policy rather than



in this SPD. Adopted Policy SPO2 adequately secures the principle of not having large clusters of affordable homes, whilst allowing some flexibility in the exact size of clusters to respond to site specific constraints and take into account the preference of Registered Providers not to have small clusters which can be challenging for management, tenant relationships and maintenance.

#### Affordable Housing Delivery

Paragraph 4.2.3 should clarify whether, if the residual affordable housing requirement is to be provided as an additional dwelling in lieu of a financial contribution, the requirement must always 'round up'. To take the example given, if the residual requirement was 92.25 rather than 92.75, would the affordable requirement remain 92 dwellings.

In terms of completion of all affordable housing before 80% of the market housing is completed (4.3: Phasing). The practicalities of meeting this requirement on a major site may make this difficult, such as where the 20% 'remaining' market housing still constitutes a large quantum of homes – meaning the affordable homes would be built and potentially occupied while within a building site. The practicalities of transferring serviced land before 40% of market homes are occupied is again a requirement that would be onerous on a large site, given the significant costs involved in providing serviced land.

This could be suitably addressed by allowing the relevant thresholds to be reviewed on a site by site basis to ensure it is an appropriate threshold to be applied.

#### Draft Biodiversity & Trees SPD Consultation

It is noted that Section 4 of the Biodiversity SPD encourages delivery of 20% Biodiversity Net Gain. It should be very clearly acknowledged that this goes beyond the 10% required by legislation and adopted local policy. The delivery of any net gain beyond 10% could therefore be an additional benefit, on schemes where it is practicable and feasible to do so. The decision maker should have clear regard of that fact having regard for other material considerations, including financial viability.

The matters of concern raised above make it clear that some further work is required in support of the Housing SPD in particular prior to its finalisation. I would be grateful if you could confirm receipt of this submission, and if you could keep me informed when revised drafts of the SPDs are published.

Yours faithfully,

***Pegasus Group***

Robert Barber  
**Executive Director**

Email: [REDACTED]