Suffolk Coastal Local Plan Examination

Hearing Day 8

Matter 4 Policies

Note on Policy SCLP5.8 Housing Mix

1. This note responds to actions arising in the hearing session on Matter 4 Policies (Wednesday 18th September, AM) which relate to the parts of Policy SCLP5.8 Housing Mix covering the size of dwellings and the requirements related to M4(2) dwellings (i.e. paragraphs 1, 2 and 3).

2. The National Planning Policy Framework (paragraph 61) states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The Strategic Housing Market Assessment Partial Part 2 Update (Document D16, page 40 – 44 of 2016-based outputs) disaggregates the housing need by size and tenure for the Suffolk Coastal area. Table 5.1 of the Final Draft Local Plan reflects this assessment, as explained in paragraph 5.38 of the Final Draft Local Plan (Document A1, page 91). The Council’s response to Inspector’s question 2.2, set out in the Council’s Matter 2A Statement (page 6-9), sets out the modifications that would result from the housing requirement figure being established based upon the 2014-based household projections – this would not significantly change the disaggregation in terms of the size of dwellings required across the District over the Plan period.

3. Inspector’s question 4.5 asked whether it is justified to apply the housing size requirements as set out in Table 5.1 to all proposals of 5 or more dwellings and whether the viability implications of such requirements had been assessed. The Council’s response (Matter 4 Statement, page 10) explains that it is not intended that Table 5.1 would be applied rigidly to all proposals as the precise mix will depend on the circumstances of each site, and that the policy had been subject to viability assessment.

4. It should be acknowledged that the table itself is not contained within the policy and that the policy expects proposals to ‘reflect’ the mix of housing identified in the SHMA. Paragraph 5.38 of the Final Draft Local Plan explains that the policy provides an emphasis on the delivery of one and two bedroom dwellings as these are currently under-represented in terms of the proportions required over the plan period and that this also responds to issues around affordability and an ageing population.

5. Discussion was had at the above hearing session around whether the policy provides sufficient flexibility to achieve other policy aims which may at times necessitate an alternative approach to housing mix. The Council considers that, whilst the overarching aim would be to secure a mix of
housing to meet the needs identified in the SHMA across the District and over the Plan period, modifications could be made to the Policy to enable an alternative approach where appropriate. Corresponding modifications to the supporting text are also proposed (set out at the end of this note).

6. Inspector’s question 4.6 asked whether Policy SCLP5.8 is justified and consistent with national policy in applying M4(2) standards to at least 50% of dwellings and on developments of more than 10 units. The Council’s response (Matter 4 Statement pages 10 – 13) explained that the approach is consistent with the Planning Practice Guidance (Document C2) on Housing – Optional Technical Standards and on Housing for Older and Disabled People. The Council’s response set out evidence related to the needs for M4(2) units based upon data including the increases in elderly persons households, the projected health of those aged 65 and over and recent data on applications for Disabled Facilities Grants.

7. During the hearings sessions, the Inspector considered whether there may be circumstances where the requirements for M4(2) cannot be met. The Council considers that, as part M4(2) is intended to be applied to a range of dwellings types (noting that the Approved Document\(^1\) contains guidance that can be applied to individual dwellings or to dwellings in communal buildings) circumstances where it is not appropriate to apply the requirement will be exceptional. The requirement for M4(2) dwellings has been tested through the Whole Plan Viability Study and has been assessed at £521 per dwelling (Document D38, page 44). The Whole Plan Viability Study concludes that this cost is viable to achieve. Modifications to address the issues discussed at the hearing session are set out below.

8. Modifications are shown in strikethrough for deleted text and in underline for additional text. The Council will include this revised wording in the schedule of modifications that is being collated as part of the Examination.

Modifications to Paragraph 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 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, 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. There may be some circumstances where it is not possible to provide 40% 1 and 2 bedroom properties, however the Council would expect applicants to demonstrate that options to secure smaller properties had been explored. This could for example include consideration of alternative layouts or property types.”

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, unless it can be satisfactorily demonstrated that this is unfeasible.

On proposals of 10 units or more 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. 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.”