

* Please note this document contains a minor clarification point made on 23/01/15 to wording on page 5.

Babergh District Council and Mid
Suffolk District Council

Local Plan: Core Strategy Focused Review – Objectively Assessed Need and Rural Growth Policy

Issues & Options – early stage consultation (regulation 18)

January 2015



Contents

1. Introduction, Context and Presumption in Favour of Sustainable Development	3
2. Objectively Assessed Need (OAN)	4
3. Rural Growth.....	6
4. Next Steps.....	10

1. Introduction, Context and Presumption in Favour of Sustainable Development

- 1.1 The current Babergh District and Mid Suffolk District Local Plans comprise a number of documents which set out the planning strategy and policies for each District. These include:
- Babergh Core Strategy, February 2014.
 - Babergh Local Plan, 2006.
 - Mid Suffolk Core Strategy, September 2008.
 - Mid Suffolk Core Strategy Focussed review, December 2012.
 - Mid Suffolk Local Plan, 1998.
- 1.2 The adopted Core Strategies set out the spatial vision and strategy for Babergh and Mid Suffolk. The Babergh Core Strategy provides a high level framework which outlines the strategy for facilitating and managing growth through a jobs led economic growth strategy which promotes and protects local distinctiveness. The Mid Suffolk Core Strategy and Core Strategy Focused Review provide a framework for managed sustainable development.
- 1.3 This is an Issues and Options (Regulation 18) early stage consultation. The Core Strategy Focused Review – Rural Growth Plan applies over the whole Districts of Babergh and Mid Suffolk and should be read together in conjunction with the Core Strategies and National Planning Policy to understand their combined effect upon a planning proposal. The Council will use the policies outlined in this document to provide a consistent approach to the assessment of planning applications across the area based upon the merits of each application and taking account of all relevant material considerations.
- 1.4 There may be some instances where a proposal may not satisfy all policy criteria, but may be deemed acceptable on balance when considered against all material considerations and based on individual site circumstances. Alternatively, there may be other occasions, where an application satisfies all policy criteria, but due to site circumstances, other material considerations may still make the proposal unacceptable. In addition, the ‘presumption in favour of sustainable development’ already applies and should be engrained within all planning decisions. This means approving development that accord with the development plan without delay, and where the plan is absent, silent or the relevant policies out of date, approving development unless policies in the Framework indicate otherwise or where any adverse impacts significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole.
- 1.5 The National Planning Policy Framework (NPPF) requires (paragraph 47) that local authorities boost significantly the supply of housing in their area.
- 1.6 This document considers the options for meeting the objectively assessed needs in the area and the options for rural growth.

2. Objectively Assessed Need (OAN)

2.1 Paragraph 47 of the National Planning Policy Framework (NPPF) requires local planning authorities to ensure that Local Plans are drawn up to meet housing demand and states:

use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

2.2 In addition to housing need, paragraphs 14, 17 and 182 of the NPPF also make it clear that local authorities should be planning to identify and meet the economic and other development needs of the local area. Whilst this document currently focusses on housing, an indicative future assessment of local economic needs may be necessary.

2.3 Identifying the housing OAN is informed by two key pieces of evidence:

- i) The Strategic Housing Market Assessment (SHMA)
- ii) Population and household projections

2.4 The SHMA was produced in 2012 and establishes that the entire administrative areas of Babergh, Ipswich, Mid Suffolk and Suffolk Coastal Councils form the housing market area which is anchored on the county town of Ipswich – this is known as the Ipswich Housing Market Area. The SHMA is available on the Council’s websites – www.babergh.gov.uk and www.midsuffolk.gov.uk .

2.5 The Councils are also updating their Strategic Housing Land Availability Assessment (SHLAA) documents which is ongoing, but it is expected that sufficient land can be identified in both districts in order to meet the objective needs. The SHLAA documents are also available on the Council websites websites – www.babergh.gov.uk and www.midsuffolk.gov.uk .

2.6 Work on the Ipswich Borough Council Core Strategy Focussed Review has indicated that there could be approximately 2,000 dwellings of un-met housing need towards the end of the Local Plan period (2031). A collaborative approach between the Ipswich Housing Market Area local authorities (Babergh, Ipswich, Mid Suffolk and Suffolk Coastal) will be undertaken in order to establish the most sustainable approach to providing for this need – it is likely that this will be addressed through a wider joint Local Plan document approach starting in 2016.

Babergh Housing Needs

2.7 The Babergh Core Strategy was recently adopted in February 2014 and is based upon meeting an objectively assessed housing need of 300 homes per annum between 2011 and 2031. This was informed by the SHMA in 2012, however, further household and population

projections evidence since that period (see Background Topic Paper with consultation) indicates that this figure remains broadly appropriate in meeting the level of demand from the full local objectively assessed housing need.

- 2.8 Given that contemporary evidence indicates that the current housing requirement for Babergh District remains broadly appropriate, no further or alternative strategies have been considered for the overall level of housing provision here.

Mid Suffolk Housing Needs

- 2.9 The Mid Suffolk Core Strategy Focussed Review was adopted in December 2012 and is based upon meeting an objectively assessed housing need of around 400 homes per annum over a 15 year period. This was informed by the SHMA in 2012, however, further household and population projections evidence since that period (see Background Topic Paper with consultation) indicates that this figure could fall short of meeting the level of demand from the full local objectively assessed housing need. Not planning to meet the full need is potentially inconsistent with the NPPF and stimulates negative indicators such as rising house prices and unaffordability.

- 2.10 Whilst the Council has not formally identified an updated full objectively assessed need figure at this time, it is considered prudent, at an early stage, to consider options for addressing a future objective need. Accordingly, the options considered are identified below:

Option MOAN 1: Continue with *existing* CS Focused Review figures (around 400 dwellings per year)

Option MOAN 2: Plan to *meet* an anticipated / evidenced OAN figure (initially considered to be around 500 dwellings per year – 7,500 overall. If the future identified OAN figure proves to be different from around 500 dwellings per year, then this would ~~*still~~ be the figure to plan for.

**please note that interpretation of this option should mean to meet the appropriate level of formally identified OAN should this be revised (whether 500, or higher or lower).*

Option MOAN 3: Plan to *exceed* an anticipated / evidenced OAN figure by around 20% to allow for contingency sites and growth ((initially considered to be around 7,500 dwellings + 20% (= +1,500)). If the future identified OAN figure proves to be different from around 500 dwellings per year, then this would be the figure to plan for, with an additional 20% contingency allowance.

Objectively Assessed Need Consultation questions:
OAN Q1: Are there other reasonable alternative option(s) that should be considered? If so, please explain and provide justification/evidence?
OAN Q2: What identified option or options do you consider preferable?

3. Rural Growth

Objective

To accommodate the objectively assessed housing need through enabling sustainable development across Babergh and Mid Suffolk.

Context

As explained in Objectively Assessed Needs section, need for Babergh is as included in the Core Strategy at 300 dwellings per year. For Mid-Suffolk evidence has indicated that the need may be 500 dwellings per year, 100 more p.a. than provided for by the existing Core Strategy. This will mean that the new plan will need to provide for an estimated additional 3,200 dwellings in mid-Suffolk than currently planned (an increase of 100 dwellings pa between 2015 and 2027 and 500 dwellings per year from 2027 to 2031. The Core Strategy Plan period must be extended to 2031 in order to meet the minimum requirements of the NPPF to plan for at least a 15 year period. An extension to 2031 would also be prudent to ensure that there is consistency with the Core Strategy plan date at Babergh.

Settlement Pattern

The settlement pattern of Babergh and Mid Suffolk is a combination of historic market towns and settlements with an extensive rural hinterland.

Approximately 30% of the population resides in the towns and the larger settlement whilst the majority (70%) are located across the rural areas.

Babergh

The Babergh Core Strategy (2014) has accommodated growth through a combination of strategic allocations in the larger towns (accommodating approximately 1,500 units) supported by an engagement led pro active approach to rural growth in 'core' and 'hinterland' villages. Provision has been made for greater policy flexibility in the rural areas, by allowing growth and service infrastructure improvements to develop in line with the day to day practice of people living in those communities. The approach in Babergh is based upon 'functional cluster' model in recognition that villages do not exist in isolation. In effect, the policy has opened up settlement boundaries to enable sustainable growth to be brought forward subject to policy criteria (to test the scale and sustainability of growth being proposed) being met. It is anticipated that [at least] 1,050 new homes will be developed by 2031 in line with this policy.

Growth outside of core and hinterland villages is considered to be development in the countryside and is based upon exceptional circumstances and subject to a proven justifiable need.

Policy CS11 (and the supporting SPD) sets out information on this approach.

Some emerging issues and questions on this are as follows:

- I. Whilst delivery to date indicates that the policy is proving successful in bringing forward new sites for development, early engagement with Parish Councils has identified that it would be beneficial if an appropriate level of increased flexibility could be added for smaller villages / hamlets where there is identified housing need and supporting infrastructure but growth can not necessarily be demonstrated to be exceptional or unacceptable in principle. The effect of this would be an increased level of flexibility for rural growth,

which could be achieved probably through a new policy for small scale villages / hamlets to provide for rural growth through small schemes

- II. Further, in order to ensure that proposals and developments coming forward under Policy CS11 are demonstrably beneficial, contribute to meeting local housing needs and use land efficiently, there appears to be an option to set a scheme size threshold below which Policy CS11 would not apply. In this way, proposals for single or similar small numbers of homes outside the village boundary would instead be assessed against NPPF (national) planning policy and general Local Plan countryside development policies rather than under CS11. The scale of the scheme size threshold deemed appropriate to apply would need to be determined and made clear in the policy

Practical implementation of Policy CS11 has also identified two operational matters that might benefit from a revised policy approach, these being:

- III. The suggestion of a consistent policy criteria approach for both Core and Hinterland Villages (whereas at present, additional criteria apply to Hinterland village proposals only). The effect of this would be that the same full set of policy criteria would apply to developments for both Core and Hinterland Villages, i.e. additional policy criteria considerations applying to development proposals for Core Villages, with those already applying to development proposals for Hinterland Villages remaining largely unchanged
- IV. A clarification that, given that much of the Policy CS11 rationale is that of permitting appropriate development beyond defined village boundaries, with the principle of development having long been generally acceptable within the defined village boundaries, the policy is designed to apply to those schemes outside village boundaries, and not within them. This would have the effect of reducing the level of justification and the level of evidence required that development proposals within village boundaries (such as redevelopments, infills, etc.) need to satisfy in order to be deemed acceptable in principle, with the principle of development usually having already been established (unless other specific policy restrictions / designations apply)

Any or all of these revisions would require change(s) to existing Core Strategy Policy CS11 (and possibly a similar, new, targeted policy), in terms of a very specific, single-issue review of the Core Strategy

Mid Suffolk

In Mid Suffolk the spatial framework for growth and development is currently based upon the principle of sustainable growth being established within settlement boundaries. The level of growth to be accommodated in the revised plan period may increase by an estimated additional 3,200 dwellings, so having early consideration to revising the previous spatial restrictions is considered necessary.

The current settlement hierarchy in Mid Suffolk is based upon towns, key service centres, primary and secondary villages. It should be noted that the status of the settlements, in particular primary and secondary settlements, is currently under review through a programme of parish engagement. In recent years the rate of housing delivery has not met in full the level of housing need, including affordable housing needs.

It is imperative that the proposed spatial approach to accommodating housing delivery is sustainable and deliverable in line with the NPPF and appropriate to the spatial context of the rural areas.

It is also considered desirable if the approach adopted for delivery enables a greater level of community engagement to ensure that it is reflective of community needs and aspirations. To this extent, there is an opportunity to recognise and strengthen the role which parish and community plans can have in delivering local sustainable development, in addition to the formal Neighbourhood Plans. This has been introduced in the Babergh Core Strategy in policy CS2, and could be included in a similar way for Mid Suffolk.

Further it is desirable if there is a threshold in site size to align with the affordable housing policy thresholds to demonstrate housing need delivery.

Spatial Options

The following reasonable spatial options for rural growth are being mooted:

Option MRG1. Concentrated development in the towns and strategic sites.

Option MRG2. Concentrate development in the towns, strategic sites and key service centres.

Option MRG3. Disperse development in the towns, strategic sites, key service centres and primary villages.

Option MRG4. Disperse development across all settlements proportionate to need, scale and impact.

Spatial Option MRG1 - Concentrated development in the towns and strategic sites.

Growth would be concentrated in Eye, Needham Market and Stowmarket where the main services are located. The additional growth would be proportionate to the size of the existing settlements and (as an indicative example) could be apportioned as follows:

Stowmarket – approx. 2300 dwellings

Needham Market – approx. 610 dwellings

Eye – approx. 290 dwellings

Total Additional Growth – 3,200 dwellings

Outside of the towns housing development would be supported within established settlement boundaries.

In the countryside, outside of settlements, development will only be permitted in exceptional circumstances and subject to a proven justifiable need.

Spatial Option MRG2 -. **Concentrate development in the towns, strategic sites and key service centres.**

Growth would be concentrated in the towns and Key service centres where the main services are located. The 13 Key service centres are: Bacton, Botesdale, Claydon, Debenham, Elmswell, Great Blakenham, Haughley, Mendlesham, Rickingham, Stowupland, Stadbroke, Thurston and Woolpit.

The additional growth would be proportionate to the size of the existing settlements and (as an indicative example) could be apportioned as follows:

Stowmarket – approx. 1,200 dwellings

Needham Market – approx. 280

Eye – approx. 130 dwellings
Key Service Centres – approx. 1,590 dwellings

Total Additional Growth – 3,200 dwellings

Outside of the towns and housing development would be supported within established settlement boundaries.

In the countryside, outside of settlements, development will only be permitted in exceptional circumstances and subject to a proven justifiable need.

Spatial Option 3 - Disperse development in the towns, strategic sites, key service centres and Primary Villages.

Growth would be concentrated in the towns, Key Service centres and Primary Villages.
The 10 following villages are categorised as Primary Villages – Fressingfield, Gislingham, Great Finborough, Hoxne, Laxfield, Norton, Old Newton, Rattlesden, Somersham, Walsham-le-Willows.

The additional growth would be proportionate to the size of the existing settlements and (as an indicative example) could be apportioned as follows:

Stowmarket – approx. 1,000 dwellings
Needham Market – approx. 230 dwellings
Eye – approx. 110 dwellings
Key Service Centres – approx. 1,320 dwellings
Primary Villages – approx. 540 dwellings

Total Additional Growth – 3,200 dwellings

Outside of the towns housing development would be supported within established settlement boundaries.

In the countryside, outside of settlements, development will only be permitted in exceptional circumstances and subject to proven justifiable need.

Spatial Option 4 - Disperse development across towns, strategic sites and all rural settlements proportionate to need, scale and impact.

This will include secondary villages and other smaller rural settlements. This will involve a flexible approach to considering proposals for development in the rural areas of Mid-Suffolk basis of criteria set out in a new policy.

The dispersed approach to approach to growth, proportionate to need, scale and impact, would enable sustainable growth in settlements across the District. Growth would be delivered proportionate to the context, need and impact.

The approach taken must be deliverable to meet the housing requirement, but also expedient to ensure that an efficient plan-led approach is in place which will bring forward housing supply. The approach will be monitored regularly to ensure it is deliverable of the appropriate housing requirements and would be reviewed if necessary.

Mid-Suffolk Rural Growth Consultation questions:

RG Q1: Are there other reasonable alternative option(s) that should be considered? If so, please explain and provide justification/evidence?

RG Q2: What identified option or options do you consider preferable?

Babergh Rural Growth Consultation question:

RG Q3: Should there be a generally more flexible policy approach (outlined under points I. – IV. above) that would:

- Enable sustainable and proportionate growth in small rural settlements not identified as (and smaller than) Core or Hinterland Villages?
- Seek to ensure that Policy CS11 proposals may better be ensured to be beneficial in terms of meeting identified housing needs, with a different policy approach towards determining very small developments outside village boundaries;
- Harmonise the policy criteria tests for both Core and Hinterland village developments;
- Clarify an operational issue in that Policy CS11 applies to developments beyond village boundaries that would otherwise have been unacceptable in principle (and vice versa)?

Do you consider any or all of the above policy change options appropriate or not?

4. Next Steps

- 4.1 Following completion of the period for consultation on the contents of this Plan, the Council will register receipt of all valid representations made to it and acknowledge this to all respondents. The Council will then carry out a detailed analysis and assessment of the content of each of the representations in order to form a view about the main issues that have been raised, any other matters, and the **further work required in respect of** sustainability appraisal. The Council will then commence preparation of the Local Plan for submission to the Secretary of State. In preparing the submission version of the Local Plan it will set out how the comments received have been taken into account and the information and level of detail to be included in future sustainability appraisal reports.
- 4.2 Upon completion of the Local Plan (under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2011), there will be a further period of consultation on the submission version. The responses and the Local Plan, together with a range of other documents, will then be submitted to the Planning Inspectorate (who act on behalf of the Secretary of State for Communities and Local Government). Following submission the Planning Inspectorate will appoint an Inspector to carry out a public examination of the Plan and to make recommendations to the Council on its adoption.