

Lavenham Parish Council

Babergh/Mid-Suffolk Joint Local Plan Commentary

1st Draft August 2017

Context

The Babergh/Mid-Suffolk Joint Local Plan (JLP) will run from 2014 to 2036. Once adopted it will include policies and land allocations. It is primarily a plan for the build environment.

Neither of the two districts have a current local plan due to their inability to demonstrate a five year housing supply, albeit that Neighbourhood Development Plans (NDP) remain current.

There is some urgency in getting a plan in place, as without it the National Planning Policy Framework (NPPF) takes precedence over planning matters. The NPPF includes the presumption in favour of sustainable development.

Background

Lavenham Parish Council (LPC) has reviewed the JLP to: in the first instance answer the questions raised therein (Appendix 1 attached) and then to further critique it. This paper serves that second point.

Attached at:-

- Appendix 1. Answers to specific JLP questions, 8 pages.
- Appendix 2. Note on Duty to Co-operate.
- Appendix 3. Note on need for proposals addressing urban density.
- Appendix 4. Note on Housing types and Affordable Housing.

Vision

The vision for the period of the JLP must be to put the wellbeing and interests of its residents central and to thus approach it in a holistic way.

Any growth should build upon identified need and address the aspirations of all residents. The process of engaging with residents is not easy; however, it should be positively addressed and greater effort needs to be made, in order to address this vital issue.

Both districts comprise largely open countryside with few towns and none of any material size. The plan should recognise this rural context. Much of the existing infrastructure is of a previous age and has not been kept up to date and maintained – any future plans must address the proper provision of this and supportive services, such as bus services.

This is meant to be a 22 year plan. The JLP needs to be very much on guard that development is not front loaded and that sequential provision of infrastructure and services will not lag behind. Moreover, any projections currently being benchmarked are pure conjecture. The JLP therefore, needs to be regularly reviewed to address changing circumstances; the outcome of Brexit is but one example.

Structure of JLP

The JLP is built up having in mind Regulation 18 of the Town and Country Planning Regulations. It overlooks the provisions of the NPPF and in particular, paragraph 150 onwards dealing with the Making of Plans. This is exaggerated by the Duty to Co-operate restricting engagement to a list of statutory bodies (see attached Appendix 2). The

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opportunity to engage with town and parish councils and their residents has been overlooked – paragraph 155 of the NPPF refers.

The central theme of the JLP is housing growth based on the 2014 Sub-National Population Projections, identifying some 8,000 *more people* in Babergh District and 13,000 in Mid-Suffolk District. Economic data is scant and an Infrastructure Delivery plan remains outstanding. The Strategic Housing Market Assessment has been produced with insufficient input from members and officers, with as an example the lack of any reference to the current list of residents and their needs seeking homes via the HomeChoice register.

Housing

Housing is central to the JLP. Apart from meeting their own requirements for future housing, Babergh and Mid-Suffolk districts are also potential repositories for overspill housing from Ipswich. It would appear that research into urban density has not been addressed (see Appendix 3 attached). Higher urban density allows the potential for any development to stay within the confines of Ipswich town and avoid the Ipswich fringe areas of the two districts being urbanised and thus overdeveloped. High density urban development also meets the need for greater use of existing infrastructure and services within Ipswich, including public transport etc.

The SHMA and the workings around it were produced by two eminent external firms of consultants. Although, the theory of this approach is, no doubt, well understood by members and officers, the cut-off point is at district level only and could therefore lead to local distortions. In addition, it appears to overlook residents seeking social/affordable homes and registered with them, via the Gateway to HomeChoice register. For the two districts this is approaching 2,000 households.

For Babergh District the net Objectively Assessed Need, included within the Housing Requirement section of the JLP for the period 2014-2036 is shown as 7,820* household units, annualised as 355. This compares to the 8,000 *more people*, not households highlighted above and this can lead to an assumption that inherent pent-up demand exists, but is not quantified.

This gross OAN should be reduced by developments completed since 2014 and in train.

In summary,

OAN gross	7,820 *
Less Net completions since 2014	560
Less Outstanding development permissions	3,050
OAN net	4,210

Strategic sites should reduce this further. It would have helped very much to have these indicated, or at least their characteristics.

The historic Chilton Woods strategic site now has planning clearance for 1,150 units, including a 25% social/affordable housing element.

The element of housing falling into any arbitrary Spatial Distribution formulae is thus reduced. Without a confirmed list of strategic sites and anticipated development thereof the 'net' element cannot be fully considered. OAN statistics are based around future dwelling sizes by bedroom. However, statistics are not available on this basis for the

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completions since 2014, nor guidance given on this for the Chiltern Woods development decision. Statistical comparison therefore becomes difficult to consider.

Appendix 4 highlights the approach, key data and the disparity between the JLP identified Social/Affordable rental demand over the plan period and the actual number of households looking for such properties now. Although the totals are similar, at some 1,000 units, no effort has been made to reconcile the two and no trend data extracted. This might have been a useful exercise to cross check the prognostications.

Affordability is only analysed at district level. Further research needs to be undertaken. In Lavenham, for instance our local economy is predominately based on low wages due to the nature of work in the hospitality and tourism sectors. The house price to earnings ratio at district level for Babergh is 8.8, compared to an England average of 7.2. This comparison alone indicates the dangers of averages. In Babergh district this ratio varies considerably. For the CO10 postcode it spans across a range of 75:1 down to 3:1. In 37 areas where wages are close to the minimum wage, the ratio is at least 22:1.

The JLP is largely silent on community assisted housing. During the last twelve months we have seen a radical reduction in sheltered housing across the Babergh district. This appears not to be made on any empirical evidence of need but to save costs. Even this cost saving is flawed as with an aging population greater pressures arise to other assistance provision such as care homes. A reappraisal based on a holistic approach to assisted housing across the district needs to be undertaken as an integral part of the JLP.

Care in the Community is another area where the JLP evidence research is lacking. Babergh District has a high proportion of people over 65 at 21.4% compared to a national average of 16.4% and Lavenham is at 33.4%, based on the 2011 census. Indeed, the mean age nationally is 39.3 years old, for Babergh 45.0 and Lavenham at 56.0. The Lavenham numbers are common across much of the rural villages'.

The Council has set the objective for the plan to deliver '*the right type of homes, of the right tenure, in the right location*' clearly more work needs to be done to meet this.

[NB * The SHMA, however, uses a lower number for proposed new builds at 7,520.]

Education

The draft education policy falls within Infrastructure in the JLP. Existing schools have little room to manoeuvre to take additional pupils. The County budget for new build either to extend an existing school or to provide a new school is inadequate. The JLP view therefore is that new school build will be driven by the Community Investment Levy. A standard new primary school (210 pupils) would require approximately 900 new dwellings.

Each village needs to look closely at where its children go to school and that school's year on year capacity. Historically, primary school children have been accommodated within their own village school or their immediate environs. There is no primary school provision planned in the JLP.

To understand the number of pupils arising from proposed sites the pupil yields for 100 homes is; 25 primary school age, 18 secondary school age and 4 pupils for sixth form age.

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The County Education Department forecasts for the development sites yet to commence within Lavenham are as follows:

- 1, 18 units on the former SCC highways site – detailed planning permission granted and included in SCC educational estimates.
2. 25 units west of Deacon’s Close – outline planning permission granted and **NOT** included in SCC educational estimates.
3. 25 units Melford Road, west of Howletts Garage, going to the Planning Committee 6th November 2017 and **NOT** included in SCC educational estimates.
4. 25 units Bears Lane, yet to go to the Planning Committee and **NOT** included in SCC educational estimates.

Lavenham Primary School has a current capacity of 105 children. With year class capacity (PAN) of 20, this school capacity could grow to 140. Forecasted capacity by year is;

2017	2018	2019	2020	2021
108	114	116	115	114

It follows that as the developments 2., 3., and 4.,above come on stream any sequential test will need to come into play and where necessary through lack of capacity thwart any commencement by at least deferral.

Infrastructure

For the purposes of the JLP Infrastructure includes, hard infrastructure such as roads and soft such as transport. Education is also included as infrastructure.

Much of the hard infrastructure across the districts is old, antiquated and poorly maintained. Bus services are not sufficiently numerous to incentivise people to give up the car and Suffolk County Council is looking to reduce further school subsidised provision.

In Lavenham we still have overhead power and telephone cabling, and included within the conservation area. We have an underground water culvert which was built sometime before 1500 and is still used by Anglian Water today. The only major exception to infrastructure provision in our village is the current replacement of the street lighting system being paid for by Lavenham Parish Council with the installation works slowly carried out by County Highways. We do enjoy an hourly bus service, but this is not sufficient to transport workers during peak times.

Managing infrastructure provision is to be welcomed; it requires however a huge investment which cannot be funded solely out of CIL. The application of any policy therefore is somewhat weak. In addition, any policy runs the risk of developer pressure to viability testing, which must, contrary to recent experience, be an open and transparent mechanism and not hidden by so called ‘commercial sensitivity’. In addition the draft policy needs to be more robust with the omission of the use of ‘likely’ and ‘may’. Simply put, should the necessary infrastructure not be in place then development cannot go ahead.

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Conclusion

The top down approach adopted to produce the draft JLP is flawed. In addition, some analysis in the JLP is too simplistic and shallow.

Moreover, available experience and information held within the Councils and the wider community should be taken cognisance of. A few communities within the JLP area enjoy a made Neighbourhood Development Plan and many others are following this route. These are based on a very rigorous engagement process with their residents and stakeholders. This exemplar methodology could be followed in the production of the JLP.

A more detailed assessment of economic need and ways of stimulating economic activity is required. Infrastructure need and delivery must be urgently addressed.

This submission should be valued as a constructive contribution to the JLP process.

Lavenham Parish Council, November 2017