

THE CORE STRATEGY & OPTIONS

HOUSING

Theme 2 - Housing

To encourage the improved provision of, and access to, appropriate housing to meet existing and future needs.

2.6 HOUSING

HEADLINE FACTS - HOUSING

- The draft Regional Spatial Strategy identifies a guideline figure of 10,200 new dwellings for the district for the period 2001-2021. Within this figure up to 3,200 are to be provided within that part of the Ipswich Policy Area (IPA) situated within the Suffolk Coastal District Council area.
- The draft Regional Spatial Strategy requires an average construction rate of 510 dwellings per annum in the period to 2021. The current construction rate in the district is around 500 dwellings p.a.
- There were at 1st April 2006 outstanding planning permissions for 3125 units. A further 2699 had been constructed between 1st April 2001 and 31st March 2006 leaving a residual total number of 4376 new dwellings to be provided within the remaining plan period.
- At the midpoint of 2005 the average price of a house in Suffolk Coastal was £175,240 compared with £155,423 (Suffolk) and £163,584 (the country).
- Statistics show that 58% of households within the district would not now be able to purchase even in the lowest sector of the market.
- The number of homeless households with dependant children approaching the Council for assistance has increased in recent years to just over 100 in 2005.
- The supply of housing is not meeting demand from within the communities
- The average household is getting smaller and older. The social changes leading to this ongoing decline in household size are expected to continue their historic trend.
- The district attracts many second homeowners (2,500 dwellings or 4.6% of the total dwellings at the 2001 census) or people retiring to the area, especially along the coast. In some parishes the level of second homes reaches as high as 30%.
- Gypsies and Romanies constitute a very low proportion of the population; in January 2005 three encampments each containing one vehicle were recorded
- The district is, however, a destination for Travellers
- The district currently contains no authorised sites for Gypsies or Travellers

The **Community Strategy** identifies as **KEY ISSUES**:

- Affordable housing
- Assisting older people to live in their own homes and communities; and
- Providing support for vulnerable adults and young people

You have told us the issues are:

- Lack of houses at prices affordable to local people.
- Lack of social rented housing.
- Imbalance between housing needs and supply.
- Second homeowners – denying local people the opportunity to buy units, particularly small ones.
- Efficient use of land and high densities may not reflect the character of the area.
- Retaining or creating small units of accommodation
- The potential imbalance between the supply of housing and the needs
- Development should be concentrated where access to facilities and services is available
- Development should be close to public transport provision
- Opportunities for development should be spread across the district

POPULATION PROFILE

- 2.6.1 The district has an ageing population with the highest proportion of people being aged between 45-64 (See Appendix 6). Most of the population are resident within the Felixstowe and Ipswich Policy Areas with the remaining market towns containing considerably fewer residents.
- 2.6.2 The predicted 2021 age structure (see Appendix 6) shows increasing proportions of older people particularly those over the age of 65 and a decreasing proportion of people in the most economically active age band of 25-44.
- 2.6.3 If this ageing population is combined with other social changes generally – marrying later in life, having children later in life and increasing divorce rates – the outcome is a decreasing average household size. The average household size in the district at 2.35 is already lower than the national average. Government projections suggest a fall by 10% to 2.1 nationally by 2026. This results in an increasing number of households and increasing demands for housing, even to meet the needs of the current population.
- 2.6.4 The population structure raises a number of issues in relation to meeting housing demand, and in helping to secure the Council's long-term vision for its area. These issues vary in extent between the different parts of the district.
- 2.6.5 A number of priorities have been identified including providing the right type of housing to attract and enable young people to remain within the district. At the other end of the spectrum, there is a need to address the needs of people as they get older. This may include looking to provide additional sheltered accommodation or smaller, more manageable units.
- 2.6.6 In addition, it is essential that housing be provided at the right price to enable people to access it. This includes providing a range of general market housing as well as affordable housing i.e. housing provided with some form of subsidy for those people unable to rent or buy at market levels. The 2006 Housing Needs Survey provides the evidence base for this.
- 2.6.7 Further requirements have or are in process of being identified, to meet more specialist types of accommodation including that for gypsies and travellers. A Gypsy and Traveller Accommodation Assessment is being undertaken jointly with the neighbouring authorities of Ipswich, Waveney, Mid-Suffolk and Babergh. This is due to report in spring 2007 and will feed into the plan process in due course.

NEW HOUSING

Draft Objective 4 New Housing

To meet as a minimum, the district's housing requirements as identified in the regional spatial strategy for the period 2001-2021. This includes providing housing that will encourage younger people to remain in the district, but also addresses the needs of what is currently an ageing population.

Such provision to be made in a manner which addresses both the immediate needs of the local resident population and the longer-term future needs of the population, in accordance with the principles of sustainable development and sustainable communities.

INTRODUCTION

- 2.6.8 The Suffolk Coastal district contains the urban fringe of the county town of Ipswich, the substantial urban area of Felixstowe, five market towns, and around a hundred communities with populations ranging between 25 and 3600. This gives a wide choice about where to locate new housing and in what quantity.
- 2.6.9 If housing is located in the right places it can bring benefits of:
- a) Wider choice
 - b) Affordable housing
 - c) Support for local facilities
 - d) A reduction in the number of car journeys
 - e) Less strain on public services
- 2.6.10 Located in the wrong places and in the wrong volumes there are dangers of:
- a) Damage to local environments
 - b) More car use
 - c) Isolation
- 2.6.11 The approach towards deciding where new housing should be distributed involves:
- a) Assessing how much housing is required
 - b) Considering in broad terms how this should be distributed and
 - c) Looking for suitable sites
- 2.6.12 Each of these steps involves options and choices.

HOW MUCH HOUSING IS REQUIRED?

- 2.6.13 The amount of new housing is set out in the Regional Spatial Strategy (RSS), also known as the East of England Plan. This considers the district in the context of the region and identifies a requirement within Suffolk Coastal of 10,200 new houses between the years 2001 and 2021. The RSS Panel Report notes in relation to overall housing numbers that *"...an important element of the increase in the number of households (and therefore numbers of houses) is the trend to reducing household size. This reduction over time in household size, or the propensity of people to form separate households applies to the whole of the existing population as well as the growth from natural increase and migration."*
- 2.6.14 These figures are supported, indeed emphasised, by recent locally researched documents, notably the David Lock Report and the Housing Needs Survey
- 2.6.15 The draft RSS (again taking into account the SoS's Proposed Changes) apportions the housing requirement between the part of the district within the "Ipswich Policy Area" (IPA) and the part outside of it at 3,200 dwellings and 7,000 dwellings respectively. The IPA includes the borough of Ipswich and parts of the districts of Babergh, Mid-Suffolk and Suffolk Coastal. The parishes affected within Suffolk Coastal are Brightwell, Foxhall, Kesgrave (town), Little Bealings, Martlesham, Nacton, Playford, Purdis Farm and Rushmere St Andrew.
- 2.6.16 In addressing the overall, housing requirement, consideration needs to be given to the sources of supply. In this respect:
- (a) An attempt has been made to estimate the potential for development within the main urban areas, market towns and larger villages. This potential consists of such sites as vacant land, redundant employment sites, redevelopment, and intensification of existing sites ("infill"), etc. It is on the whole site specific and based on fieldwork carried out in 2004 as an "urban capacity study". A discount has been applied on the grounds that not all sites are likely to come forward. This discount is 10%. A desktop exercise was undertaken in early 2006 to update the study.

- (b) Within the smaller villages an attempt has also been made to estimate the occurrence of the intensification of existing sites - small developments such as infilling. This is not based on field survey but a projection of consents granted over the previous 5 years, discounted by two thirds on the basis that the supply is not infinite.
- (c) There are a significant number of outstanding planning permissions, some of which may be under construction. A large proportion is situated on the edge of Ipswich. Again a discount of 10% has been applied.
- (d) Windfall is the occurrence of development that cannot be predicted. Government advice is that an over-reliance must not be placed on windfall in meeting identified housing requirements. Other than in respect of infilling in (c) above it has, therefore, been excluded as a source of supply although its occurrence will be monitored;

2.6.17 The Council estimates that from the sources listed above provision can be identified for approximately two thirds of the total housing requirement. The remaining third will require positive provision in the Local Development Framework, through:

- (a) Brownfield allocations - sites to be identified in the LDF that occur on land that was previously developed. This could include current or vacant employment sites or caravan parks for example; and
- (b) Greenfield allocations - sites that were not previously developed. These could occur within urban areas (e.g. redundant playing fields, allotments or vacant overgrown plots) or outside such areas (such as farmland).

Alternative Options – Housing Numbers

2.6.18 Option One. This option would see a possible reduction in housing numbers over the plan period. The argument for this would be:

- a) To seek to limit development on greenfield sites within the district.
- b) Alternatively, it could be part of a strategy put forward by the Council whereby the housing numbers identified in the RSS Panel Report for the Ipswich Policy Area are located in areas in and around Ipswich and not in Suffolk Coastal.

2.6.19 However, such an Option would:

- a) Not be consistent with the Regional Spatial Strategy
- b) Not provide a level of housing commensurate with the growth in job numbers within the Suffolk Coastal district area.
- c) Restrict the opportunities for affordable housing and not meet identified need.
- d) In the Ipswich context mean that new housing is not located on the eastern fringe where there is major employment (Martlesham Heath and Adastral Park), an excellent communications network and a range of services

2.6.20 Option Two. This option identifies sufficient provision to meet the overall requirement set out in the RSS and is in accordance with the split between the Ipswich Policy Area and the remainder of the district. To follow the strategy set out in the RSS would be to ensure the Core Strategy was in compliance with this plan and the overall development strategy for the area i.e. balancing housing and employment, maximising opportunities for public transport, access to services and facilities etc.

2.6.21 However, it might not enable the achievement of wider objectives relating to Felixstowe and the Trimleys as well as individual market towns

2.6.22 Option Three This option would provide for development levels over and above that set out in the RSS **by extending the plan period beyond 2021.**

- 2.6.23 Increasing provision over that set out in the RSS, but within certain specified limits, could bring additional benefits to the area. In particular, allowing for additional development over and above the limit set in the RSS for the Ipswich Policy Area, offers the opportunity to create a larger mixed use development encompassing a fuller range of social and community facilities, to complement that which currently exists at Grange Farm. Limiting development to the number of units that remains outstanding to comply with the RSS runs the risk of being too small to contribute significantly to existing provision, not making the best use of land and becoming, in effect, a dormitory area to Ipswich. Such an approach would not accord with the government's objective of creating sustainable communities.
- 2.6.24 Within the Felixstowe Peninsula, the numbers of units are not fixed through the RSS, but are for consideration through the Core Strategy. The spatial distribution of housing across the district is considered in the following section. With the general reduction in household size, additional new housing is required at these other settlements just to maintain provision for the existing population. It is reasonable to assume, therefore, that at least some new housing provision is necessary in all settlements identified in the settlement hierarchy.
- 2.6.25 Allowing extra provision of development within the Felixstowe Peninsula would, however, start to address the issues identified through the David Lock study, whilst still allowing growth to occur at other settlements. The Council acknowledges the consultant's conclusions that without significant levels of growth, (i.e. their scenarios 3 and 4), the town will continue to experience a decline. Given the importance of the town for employment use linked to the Port (a strategic employment site), its potential for tourism, and the opportunity to reduce the levels of commuting, an approach that would allow for additional housing provision could be justified.
- 2.6.26 Allowing additional provision, would also introduce a measure of flexibility in meeting the RSS housing requirement. Given the unique range of settlements within the district, it would allow development to continue at the market towns and larger settlements even if development is delayed at other smaller settlements, thereby helping to maintain the average annual requirement.
- 2.6.27 However, Such an Option:
- a) Runs the risk of causing the LDF to be inconsistent with the RSS.
 - b) Means that additional provision is most likely to occur on greenfield land and the Council will need to ensure that this does not prejudice the development of brownfield sites first, particularly given that greenfield sites are generally considered easier to develop.

THE SPATIAL DISTRIBUTION OF NEW HOUSING

- 2.6.28 Having determined the amount of new housing, the next stage in the process is to consider its broad spatial distribution – where will it be located? Such consideration is influenced by a number of factors including national policy guidance, particularly Planning Policy Statement 3 on Housing, the Regional Spatial Strategy, an understanding of the settlement pattern and hierarchy, and the results of public consultation.

NATIONAL AND REGIONAL POLICY

- 2.6.29 National policy and the Regional Spatial Strategy (RSS) give some guidance on the distribution of housing based on the principles of sustainable development and sustainable communities, namely:
- a) Car dependency should be reduced by locating housing closer to employment, education, health facilities, shops, leisure and local facilities
 - b) The majority of new development should be located in and adjacent to the main urban areas

- c) The role of market towns and large villages in providing employment and services to a rural hinterland should be sustained
- d) Careful examination of how a settlement or group of settlements functions is required
- e) The quality and character of the rural areas should be protected

The role of the Core Strategy is to translate these principles to the local level. It does this through the settlement hierarchy, which identifies a range of settlement types throughout the district. In addition, the Council is committed to addressing the acknowledged decline currently being experienced in Felixstowe. With the recent acquisition of “Growth Point Status” for the Haven Gateway area, which in Suffolk Coastal includes much of the district, the emphasis will be on creating the infrastructure required to support the levels of growth proposed in the RSS. There is also the likelihood that housing requirements will be increased in the longer term.

OPTIONS FOR HOUSING DISTRIBUTION

2.6.30 As noted in paragraph 2.6.16 approximately two thirds of the district-wide requirement of 10,200 new dwellings between 2001 and 2021 can be accounted for in terms of the following sources of supply – completions, current planning permissions, brownfield opportunities. The net requirement is 3620 new dwellings requiring positive provision in the DPD.

2.6.31 Having, therefore, determined the amount of new housing that has to be provided and set the principles to determine where it should be located, this section of the Report considers its spatial distribution.

2.6.32 In considering the Options the following are important:

- (a) The RSS distinguishes between that part of the district of Suffolk Coastal that falls within the “Ipswich Policy Area” and that which falls outside of it. The Ipswich Policy Area contains the parishes of Brightwell, Foxhall, Little Bealings, Martlesham, Nacton, Playford, Purdis Farm and Rushmere St Andrew as well as the town of Kesgrave
- (b) The Panel that examined the RSS was quite clear in terms of identifying a specific number of houses to be located within the Ipswich Policy Area;
- (c) Felixstowe is acknowledged to be a major employment centre and should be considered as a potential location for a significant proportion of the housing requirements in order to balance housing and jobs. This was recognised by the Panel that considered the RSS.
- (d) The market towns within the Suffolk Coastal district – Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge – perform important functions and, subject to the ability to identify suitable sites, would benefit from additional modest allocations of new housing in order to support local services and redress population imbalances. At Leiston, the need to have regard to the nuclear safeguarding zone associated with the power station complex at Sizewell will also have to be taken into account.
- (e) The larger villages might enjoy similar benefits
- (f) There is a need for affordable housing across the district
- (g) Feedback from public consultation suggested that development should be spread across the district but that the largest concentrations should be at the larger urban centres.

2.6.33 In respect of (c) above, the Council gives considerable weight to the findings of the Felixstowe Study by David Lock Associates, as referred to previously

Alternative Options

2.6.34 When considering the possible range of options for distributing houses the Option of a new settlement (i.e. create a new community by putting all the new houses in one location) is not considered. This is because such an Option would be contrary to the

Regional Spatial Strategy and, the amount of housing proposed for the district is unlikely to make it sustainable.

2.6.35 Six potential Options have however been identified for the spatial distribution of housing across the district as a whole. These are summarised in Appendix 4, together with their positive and negative benefits. In short these are:

Option One - to exceed the identified requirement for the Ipswich Policy Area and locate all of the net housing requirement of 3620 there;

Option Two - to respect the RSS Panel recommendations in respect of the Ipswich Policy Area by allocating the minimum necessary in order to meet the requirement of 3200, and then locate all of the remaining net requirement in Felixstowe and the Trimleys;

Option Three - to share equally the net housing requirement between the Ipswich Policy Area and Felixstowe/Trimleys;

Option Four - to share the net housing requirement between the Ipswich Policy Area, Felixstowe/Trimleys and the market towns;

Option Five - to share the net housing requirement between the Ipswich Policy Area, Felixstowe/Trimleys, the market towns and the larger villages; and

Option Six – if the Option of exceeding the RSS housing requirements is pursued, to build on the approach set out in Option Five, but extend it to exceed the RSS requirements in order that the future planning of the Ipswich Policy Area and Felixstowe/Trimleys can take place without being constrained by ceilings on housing numbers. This additional development is likely to take place beyond the current plan period

2.6.36 In terms of the **market towns** the potential number of dwellings under Options 4, 5 and 6 is presented as a cumulative total. This is because at this stage of the Plan development process, precision in respect of each town is not possible. However, for each town a range of additional housing is being put forward. This is in addition to sites that have planning permission, potential sites identified within the urban area and unpredicted windfall. The range has been established on the basis of:

- The nature of the individual town, most notably the sensitivity of its setting bearing in mind that the range of new housing is most likely to be located on greenfield sites
- Major constraints such as roads, rivers and the Area of Outstanding Natural Beauty

2.6.37 The range should be considered to represent Options, from the lowest to the highest number. The ranges are:

Market Town	Outstanding planning permissions (2004)	Urban Capacity Sites (2004)	Range* Potential Allocations	Comments
Aldeburgh	108	42	0 - 50	Entirely within the AONB with sensitive boundaries
Framlingham	155	81	150 - 300	Reasonably self-contained with employment facilities and a range of services

Leiston	96	237	0 - 150	Sizewell safeguarding restrictions may restrict development to the lower end of the range
Saxmundham	230	153	150 - 300	Reasonably self-contained with employment facilities and a range of services
Woodbridge	70	183	0 - 100	Strongly constrained, notably by the A12.

Footnote: This is in addition to sites that have planning permission, potential sites identified within the urban area and unpredicted windfall.

2.6.38 In respect of large villages, or 'key service centres' if that particular settlement designation is pursued, the Options of those that will be appropriate for development are numerous given the number of settlements involved. Therefore, a decision as to whether a particular settlement can accommodate development will be taken on the basis of:

- a) The local need for housing;
- b) The views and aspirations of the local community;
- c) The amount and type of facilities available; and
- d) The nature of the individual settlement, most notably the sensitivity of its setting bearing in mind that the new housing is most likely to be located on greenfield sites

LOOKING FOR SUITABLE SITES

2.6.39 The actual sites that are allocated to meet the requirements and conform to the spatial distribution will be the subject of separate consultation and set out in a separate Local Development Document. In broad terms, these choices will be identified in a structured way having regard to the principles of sustainable development and sustainable communities:

- a) Priority should be given to previously developed (brownfield) land in preference to greenfield land
- b) Where development has to take place outside urban areas the most sustainable option should be considered
- c) There should be a systematic approach to assessing the development potential of sites

General Locations

2.6.40 In respect of the Ipswich Fringe, Felixstowe and the Trimleys, and, to a lesser extent, the market towns there are **three basic Options when it comes to deciding the strategic location** for development.

2.6.41 Option One is to locate the housing in a specific area on one large site. This offers benefits of:

- a) The creation of a range of social and community facilities
- b) The long term opportunity to create a larger mixed use development
- c) Strategic thinking in respect of infrastructure provision

2.6.42 The dis-benefits of such an approach relate to:

- a) The potential increased impact on the environment and on infrastructure such as roads
- b) The lack of flexibility and choice

2.6.43 Option Two is to locate the housing in two, or if the numbers and size of settlement permit it, three areas possibly located apart from each other. The benefits of such an approach include:

- c) the opportunity, albeit less so for a smaller the site, to create mixed use development encompassing a range of social and community facilities
- d) spreading of the impact
- e) increased choice

2.6.44 The dis-benefits include:

- a) Runs the risk of the developments being too small to support new services and becoming, in effect, dormitory estates. Such an approach would not accord with the government's objective of creating sustainable communities

2.6.45 Option Three is to "pepper-pot" development on a number of small sites spread over a number of areas. This has the benefits of:

- a) Reducing environmental impact
- b) Creating flexibility and choice

2.6.46 The dis-benefits are, amongst other things:

- a) A distinct lack of strategic forward planning
- b) The creation of small extensions to urban areas, all lacking cohesion

Specific Site Selection

2.6.47 The actual sites that are allocated to meet the requirements and conform to the spatial distribution will be the subject of separate consultation and set out in a separate Local Development Document. Options will be identified. In broad terms, these choices will be identified in a structured way having regard to the principles of sustainable development and sustainable communities:

- a) Priority should be given to previously developed (brownfield) land in preference to greenfield land
- b) Where development has to take place outside urban areas the most sustainable option should be considered
- c) There should be a systematic approach to assessing the development potential of sites

2.6.48 The criteria to be used in the identification of sites will include:

- a) Compliance with the RSS
- b) Proximity to areas of employment
- c) Proximity to community infrastructure, notably schools
- d) Public transport to town centres
- e) Landscape issues
- f) Impact on areas of wildlife importance
- g) Impact on the identity of individual settlements
- h) The local need for affordable housing
- i) Strategic flood risk
- j) Potential impact on commuting patterns

SUMMARY OF THE HOUSING OPTIONS

AMOUNT OF HOUSING REQUIRED																	
Option 1	Less than the RSS requirement of 10,200 new houses in the district in the period 2001 to 2021																
Option 2	The RSS requirement of 10,200 in the district in the period 2001 to 2021																
Option 3	More than the requirement of 10,200 new houses, extending the period beyond 2021																
HOUSING DISTRIBUTION																	
All Options	Most housing will be created through existing planning permissions, sites in urban areas and windfall																
Option 1	<p>The balance will be allocated on the fringes of Ipswich</p> <table border="0"> <tr><td>Ipswich Fringe</td><td>3620</td></tr> <tr><td>Felixstowe/Trimleys</td><td>0</td></tr> <tr><td>Aldeburgh</td><td>0</td></tr> <tr><td>Framlingham</td><td>0</td></tr> <tr><td>Leiston</td><td>0</td></tr> <tr><td>Saxmundham</td><td>0</td></tr> <tr><td>Woodbridge</td><td>0</td></tr> <tr><td>Key Service Centres</td><td>0</td></tr> </table>	Ipswich Fringe	3620	Felixstowe/Trimleys	0	Aldeburgh	0	Framlingham	0	Leiston	0	Saxmundham	0	Woodbridge	0	Key Service Centres	0
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Option 2	<p>The balance will be allocated at Felixstowe/Trimleys plus some on the fringes of Ipswich sufficient to satisfy the RSS</p> <table border="0"> <tr><td>Ipswich Fringe</td><td>900</td></tr> <tr><td>Felixstowe/Trimleys</td><td>2720</td></tr> <tr><td>Aldeburgh</td><td>0</td></tr> <tr><td>Framlingham</td><td>0</td></tr> <tr><td>Leiston</td><td>0</td></tr> <tr><td>Saxmundham</td><td>0</td></tr> <tr><td>Woodbridge</td><td>0</td></tr> <tr><td>Key Service Centres</td><td>0</td></tr> </table>	Ipswich Fringe	900	Felixstowe/Trimleys	2720	Aldeburgh	0	Framlingham	0	Leiston	0	Saxmundham	0	Woodbridge	0	Key Service Centres	0
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Option 4	<p>The balance will be shared between the fringes of Ipswich, Felixstowe/Trimleys and the market towns</p> <table border="0"> <tr><td>Ipswich Fringe</td><td>900</td><td></td><td></td></tr> <tr><td>Felixstowe/Trimleys</td><td>2220</td><td></td><td></td></tr> <tr><td>Aldeburgh</td><td>0 – 50</td><td>)</td><td></td></tr> <tr><td>Framlingham</td><td>150 – 300</td><td>)</td><td></td></tr> <tr><td>Leiston</td><td>0 – 150</td><td>)</td><td>Total - 500</td></tr> <tr><td>Saxmundham</td><td>150 – 300</td><td>)</td><td></td></tr> <tr><td>Woodbridge</td><td>0 – 100</td><td>)</td><td></td></tr> <tr><td>Key Service Centres</td><td>0</td><td></td><td></td></tr> </table>	Ipswich Fringe	900			Felixstowe/Trimleys	2220			Aldeburgh	0 – 50)		Framlingham	150 – 300)		Leiston	0 – 150)	Total - 500	Saxmundham	150 – 300)		Woodbridge	0 – 100)		Key Service Centres	0		
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Option 6	<p>If the RSS is to be exceeded, the balance will be shared between the fringes of Ipswich, Felixstowe/Trimleys, the market towns and the villages identified as key service centres</p> <table border="0"> <tr><td>Ipswich Fringe</td><td>1500</td><td></td><td></td></tr> <tr><td>Felixstowe/Trimleys</td><td>2720</td><td></td><td></td></tr> <tr><td>Aldeburgh</td><td>0 – 50</td><td>)</td><td></td></tr> <tr><td>Framlingham</td><td>150 – 300</td><td>)</td><td></td></tr> <tr><td>Leiston</td><td>0 – 150</td><td>)</td><td>Total - 500</td></tr> <tr><td>Saxmundham</td><td>150 – 300</td><td>)</td><td></td></tr> <tr><td>Woodbridge</td><td>0 – 100</td><td>)</td><td></td></tr> <tr><td>Key Service Centres</td><td>100</td><td></td><td></td></tr> </table>	Ipswich Fringe	1500			Felixstowe/Trimleys	2720			Aldeburgh	0 – 50)		Framlingham	150 – 300)		Leiston	0 – 150)	Total - 500	Saxmundham	150 – 300)		Woodbridge	0 – 100)		Key Service Centres	100		
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Woodbridge	0 – 100)																															
Key Service Centres	100																																
<p>SUGGESTED CRITERIA TO BE USED TO DETERMINE WHICH LARGE VILLAGES/KEY SERVICE CENTRES WILL BE THE SUBJECT OF AN ALLOCATION</p>																																	
<ol style="list-style-type: none"> 1. The local need for housing; 2. The views and aspirations of the local community; 3. The amount and type of facilities available; and 4. The nature of the individual settlement, most notably the sensitivity of its setting bearing in mind that the new housing is most likely to be located on greenfield sites 																																	
<p>POTENTIAL OPTIONS IN RESPECT OF HOW HOUSING COULD BE DISTRIBUTED IN THE IPSWICH POLICY AREA ; FELIXSTOWE/TRIMLEYS & THE MARKET TOWNS?</p>																																	
Option 1	One large allocation																																
Option 2	A small number of medium sized sites																																
Option 3	A variety of sites of different sizes and types																																

SUGGESTED CRITERIA TO BE USED TO LOCATE A SPECIFIC ALLOCATIONS

1. Compliance with the RSS
2. Proximity to areas of employment
3. Proximity to community infrastructure, notably schools
4. Public transport to town centres
5. Landscape issues
6. Impact on areas of wildlife importance
7. Impact on the identity of individual settlements
8. The local need for affordable housing
9. Strategic flood risk
10. Potential impact on commuting patterns

QUESTIONS – Housing Numbers

- Q12 Which of the three options listed do you prefer and why?
Option 1
Option 2
Option 3

Housing Distribution

- Q13 Which of the six options listed do you most agree with? Please rank the options in order of preference (A-F). “A” is the most favoured. “F” is the least favoured.
Option 1
Option 2
Option 3
Option 4
Option 5
Option 6

Please give reasons for your preferred choice.....

- Q14 Are there any alternative options to the six listed which are both practical and realistic, that you think the Council should be considering? Y/N
If YES what are they?.
- Q15 Do you consider the suggested range of housing numbers set out for each of the market towns to be broadly correct? YES/NO
If NO, why not?

Suitable Sites (general locations & site specific criteria)

- Q16 Which option do you consider the most appropriate for:
- (i) Ipswich Policy Area
 - (ii) Felixstowe & the Trimleys
 - (iii) The market towns
- Q17 With reference to the site specific criteria for the identification of housing sites (paragraphs 2.6.47 – 2.6.48) are there any additional criteria you would wish to see included?

FIVE YEAR HOUSING LAND SUPPLY

- 2.6.49 Government guidance requires that Local Planning Authorities through their local plans can maintain a 5-year supply of land. There is therefore no option other than to ensure such provision. Based on recent rates of construction however, the Council is satisfied that the options set out above offer sufficient flexibility, to comply with government guidance. This is because a high proportion of the initial five-year tranche comprises outstanding planning permissions, much of which consists of large estates under construction.
- 2.6.50 However, it is expected that such developments will be built out after 5 years and will need to be replaced by some of the allocations unless the sources of land in urban locations continues to supply the house-building industry. This will need to be monitored. It is expected that in practice, new development will be provided on a mix of brownfield and greenfield sites. The housing trajectory shown in Appendix 7 gives an indication of how this may be achieved.

MEETING HOUSING DEMAND (SIZE, TYPE AND TENURE OF DWELLINGS)

Draft Objective 5 Meeting Housing Demand

To increase the stock of housing to provide for the full range of size type and tenure of dwellings to meet the demands of the existing and future population by maximising the use of the existing stock through conversion, adaptation or extension and targeting new provision to meet identified shortfalls and longer term needs.

HOUSING DEMAND - AFFORDABLE HOUSING

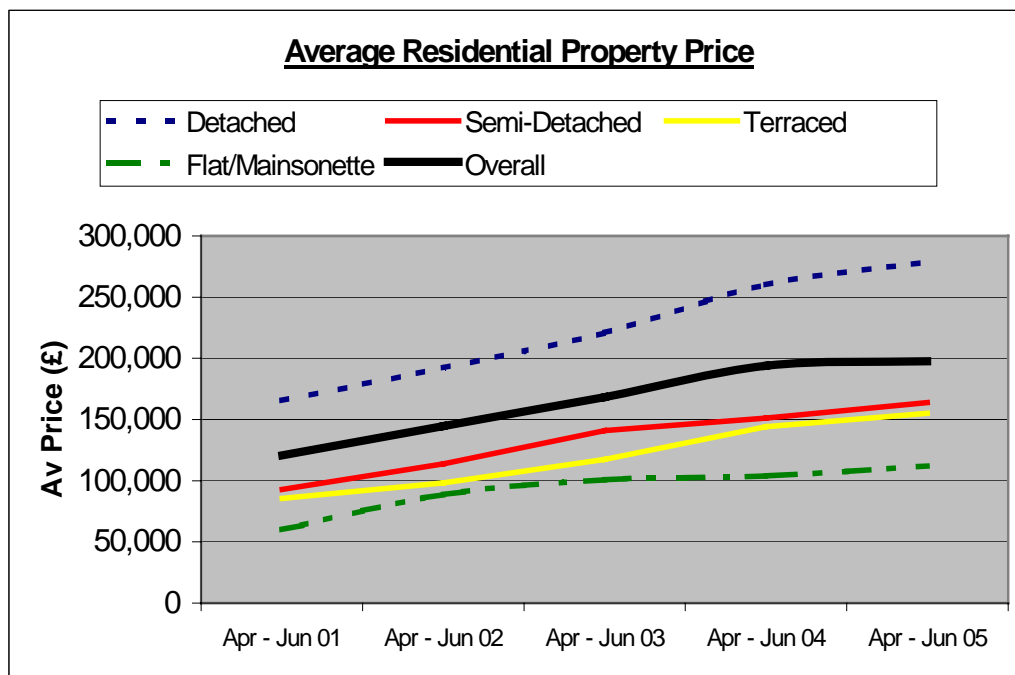
- 2.6.51 House prices within the district since 2001 have shown an average rise of 64% (see Table 4). The implications are that if income levels do not match similar increases, the level of exclusion due to housing affordability will be extended. This issue is common across much of the country. In Suffolk Coastal, the average income in April 2005 was £29,285 compared with £30,640 regionally and £28,210 nationally. Notwithstanding this high annual average wage, there are considerable disparities in earnings within the district, with much of the population in the northern more rural sector reliant on low wages linked to the prevalence of the agricultural industry, tourism and hospitality and social care.
- 2.6.52 Table 3 below indicates the housing affordability ratio across the district. It can be seen that the ratio between house prices and incomes is increasing year on year. In 2005, the average property price in the district was just over 7 times greater than people's average yearly earning, despite the gradual increase of the latter.

Table 3 Ratio Between Average House Price and Average Income

Apr – Jun 02	Apr – Jun 03	Apr – Jun 04	Apr – Jun 05
5.71	6.35	7.26	7.33

Source: Suffolk Observatory

Table 3 Average Residential Property Price



Source : Land Registry

2.6.53 The District Council also commissioned a Housing Needs Study, completed in July 2006. The key points to emerge from this study are:

- a) Household affordability depends on the relationship between the cost of appropriate local housing and the amount that the household is able to afford;
- b) The housing model used identifies an overall net requirement in the next 5 years for 2,335 additional dwellings (this equates reasonably well with the expectation of 2550 dwellings over the same period in order to meet the requirements set in the Regional Spatial Strategy);
- c) The net requirement is attributable to a net gain of 2,500 households through migration coupled with an indigenous decline of 200 households (as fewer households form than dissolve);
- d) The balance of housing requirements is for 19% social housing, 5% intermediate (i.e. 24% affordable housing) and 76% general market housing. This balance is determined on the basis of affordability, assuming that the relationship between house prices and income remains constant.

2.6.54 The definition of affordable housing used in the study, and to be used in the Core Strategy, is:

“Affordable housing is housing of an adequate standard that is cheaper than the housing generally available in the local housing market. It comprises:

- *Social housing, which is provided to rent (or on a shared ownership basis) by local authorities or registered social landlords at below market cost for households in need; and*
- *Intermediate housing, which is housing that is below market rents but above social rent scales. It can include key worker schemes or low cost ownership (but not in this*

case because of the problems of maintaining the low cost in perpetuity). A key worker is someone whose services are essential to the development and sustainability of the local community, e.g. a teacher or doctor)."

2.6.55 Based on the proportions arising from the survey, the following targets will be set for affordable housing in the next 5 years (figures have been rounded):

- 440 social units (19% of 2335)
- 120 intermediate units (5% of 2335)

Available Options

2.6.56 Providing housing to meet the needs of the local population including affordable housing is part of the government's priority of a "decent home for all". The government also requires Local Authorities to undertake Housing Needs Surveys to ensure that they are provided with up-to-date information on need within their local area. There is therefore no option in relation to whether or not the issue of affordable housing is provided for through the Core Strategy. The issue (and options) is how best to address this issue to maximise the opportunities to meet the level of housing need identified in the Housing Needs Survey.

2.6.57 When considering the alternative options for achieving the affordable housing target, the following factors have been taken into account.

2.6.58 Meeting (or exceeding) the housing requirements set out in the RSS will achieve a substantial amount of affordable housing if a proportion of the total has to be such. However, not all development will be able to provide affordable housing on account of the facts that many developments already have planning permission (and exclude affordable housing), and a significant number of new developments will consist of one or two dwellings only.

2.6.59 The more significant strategic allocations will potentially be located in the south of the district around the major centres of Felixstowe and the Ipswich Policy Area. Although other more modest allocations may well be made in the market towns, choice and location of affordable housing is limited. The needs of more rural communities, particularly in the north of the district, are not being addressed.

Alternative Options

2.6.60 Option One - To continue with the policy in the adopted Local Plan 2nd Alterations. This new policy was only adopted in March 2006 and as yet has not been in operation long enough to determine how successful it has and is likely to be. This new policy has reduced the thresholds at which affordable provision will be sought in order to address the increasing problem of affordability within the District. The policy distinguishes between towns and villages with a requirement for a 1 in 3 affordable provision for developments of 6 or more; and 3 or more units respectively. It also permits 100% affordable housing on exception sites on the edges of market towns or villages.

2.6.61 Option Two – This option represents a refinement of Option One. It addresses, more specifically, the needs of the rural areas and the difficulties that have been experienced in bringing "exception sites" to fruition. Under this option, where rural sites on the edges of villages are specifically identified to meet the more local rather than the strategic housing requirements the affordable requirement would increase to 2 in 3 of the units provided. Early feedback suggests that site owners are more likely to bring sites forward where there is a prospect of one in three units being sold on the open market. The final refinement would limit individual developments to a maximum of 12 units reflecting the need for schemes to be modest in number and well related in scale to the size and scale of the settlement.

2.6.62 For both Options One and Option Two, the proportions of social and intermediate housing required for individual schemes will depend upon local need as evidenced in the Housing Needs Survey or local parish survey. Where possible (i.e. subject to changing legislation in

relation to right to buy) such units would be expected to remain as affordable housing, for local needs in perpetuity.

2.6.63 Option Three – Under this Option, the proportion of affordable housing required from new development would reduce to 24%, the proportion recommended in the latest 2006 Housing Needs Survey: There are a number of disadvantages with this blanket approach as follows:

- a) The proportion of 24% relates to the total number of dwellings that will come forward in the next 5 years. A large element of these will be on small sites of one or two dwellings where an element of affordable housing is impractical. Therefore, the proportion should be higher than 24%. The current figure of 33¹/₃% appears a reasonable one. Based purely on past trends this is expected to yield 450 of the total requirement of 560 affordable units in the next 5 years. There is, therefore, no justification to increase it to, say 40%.
- b) The thresholds are already very low. A threshold of two units in villages would require a proportion of 50% in order to be workable.
- c) The currently adopted policy is expected to be a successful means of achieving affordable homes in rural communities, particularly with the threshold at such a low level in villages.

2.6.64 A summary of how each of the three Options will achieve affordable housing is set out below.

OPTION 1	OPTION 2	OPTION 3
<ul style="list-style-type: none"> • A proportion of the housing allocations made at Major Centres and Market Towns, as identified on the Proposals Map. That proportion will be 1 in 3 affordable units • Exception sites at Market Towns and Villages where 100% of the units are affordable units. Such sites should not normally exceed 12 units in total. • On other sites which may come forward for development during the plan period, and which conform to planning policy, a proportion of 1 in 3 affordable units will be required. The 	<ul style="list-style-type: none"> • A proportion of the housing allocations made at Major Centres and Market Towns, as identified on the Proposals Map. That proportion will be 1 in 3 affordable units • A proportion of modest allocations at Large Villages/Key Service Centres to meet the local needs of rural communities, as identified on the Proposals Map. That proportion is to be 2 in 3 affordable units (“2 + 1”). • Exception sites at Market Towns and Villages where 100% of the units are affordable units. Such sites should not normally exceed 12 units in total. • On other sites which may come forward for development during the plan period, and which conform to planning policy, a proportion of 1 in 3 affordable units will be required. The thresholds before this 	<ul style="list-style-type: none"> • A proportion of the housing allocations made at Major Centres and Market Towns, as identified on the Proposals Map. That proportion will be 24% affordable units • Exception sites at Market Towns and Villages where 100% of the units are affordable units. Such sites should not normally exceed 12 units in total. • On other sites which may come forward for development during the plan period, and which conform to planning policy, a proportion of 24%

<p>thresholds before this requirement comes into effect are 3 or more units in Villages, and 6 or more units in Major Centres and Market Towns</p>	<p>requirement comes into effect are 3 or more units in Villages, and 6 or more units in Major Centres and Market Towns</p> <ul style="list-style-type: none"> • Housing in non-sustainable settlements will only be permissible where it is required to meet a proven local need 	<p>affordable units will be required. The thresholds before this requirement comes into effect will need to be reduced from the current 3 or more units in Villages, and 6 or more units in Major Centres and Market Towns</p>
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QUESTION - Affordable Housing

- Q18 Which and why of the options listed do you consider would best meet the affordable housing needs of the district ?
- Option 1
 - Option 2
 - Option 3.

GYPSIES/TRAVELLERS AND TRAVELLING SHOWMEN

- 2.6.65 Gypsies/Travellers and Travelling Showmen have specific housing requirements that the Council is required by government to address. As with affordable housing provision, it is essential that this requirement be based on robust evidence of need. The best current quantitative information currently available on the Gypsy and Traveller communities is a bi-annual survey of caravans, carried out by the Council. No count has been carried out for the Traveller community. The Council has no authorised Gypsy and Traveller sites and hence in the last three years only one caravan has been recorded on each of three unauthorised sites. It is recognised therefore that this information is wholly inadequate, and does not reflect the numbers of Travellers in particular, known to use the district. Further detailed information is required.
- 2.6.66 A Gypsy and Traveller Accommodation Assessment (GTAA) has been commissioned jointly with the neighbouring authorities of Ipswich Borough, Mid-Suffolk, Babergh and Waveney District Councils', given the nature of the gypsy, traveller and travelling showpersons' lifestyle. This survey will provide each of the participating Councils with details of the number and type of sites required within their area. The information will not be available until February 2007. Further assessment work is being carried out to support the RSS. With regard to possible options, it is not realistic to look at identifying sites within the Core Strategy or the Site Specific Strategy given the current timetable. The only option is to include a criterion-based policy that accords with latest government guidance within the Core Strategy. Such a policy will provide the basis on which any applications for sites may come forward in advance of the GTAA work reporting and being implemented.

RETENTION OF SMALL DWELLINGS

- 2.6.67 The provision and retention of small units of accommodation has been identified as an important element in achieving the Council's Vision for the district. They are units that meet the needs both of smaller households just starting out and that of parts of the older section of the population looking to downsize. This need is reflected across both the urban and rural areas. There is some concern that where the two groups are competing within the same

locality for a limited supply of small units, that the older people (resident or in-migrating) will win out as they are potentially better off. This in turn can force prices beyond the scope of the younger, economically active residents the Council is trying to retain.

- 2.6.68 The loss of such units also has implications in terms of looking to secure balanced communities that provide for the full range of size and type of unit within a locality. In relation to new estates for example, the mix of dwellings is established at the planning application stage having regard to what is about in the locality. Once built, it is not uncommon for small units to be extended and bedrooms added.
- 2.6.69 Given the price of properties, it is often cheaper for example to extend an existing 2-bed property than to move and buy an equivalent 3-bed property. It could be argued that this negates the arguments put forward at the planning application stage for the final mix to be agreed.

Alternative Options

- 2.6.70 There are a number of alternative options that the Council could pursue to address this issue.
- 2.6.71 Option One – Do nothing. Let the system continue as existing. This is perhaps the easiest option to pursue, but runs the risk of not achieving the Council’s Vision for sustainable communities or working to actively encourage younger people to remain within the District. Under this option, smaller built units would continue to be lost but new provision would continue to be provided as new applications are submitted. In those settlements where new provision is likely to be limited this poses a greater potential problem.
- 2.6.72 Option Two – Under this option, conditions would be placed on all new developments of one and two bedroom dwellings which would prevent them being extended in such a way as to create an additional bedroom(s). It would not prevent conservatories or similar type extensions being added. Limiting development in this way would need to be done by way of a condition at the planning application stage. Whilst this would no doubt be challenged at appeal, it is difficult to see how the Council could proactively pursue its stated intention if such an approach is not adopted. How successful the policy was would be monitored through the Annual Monitoring Report.
- 2.6.73 Option Three – This third option would be to apply the policy of retaining smaller dwellings retrospectively. This would mean not allowing any extensions on all small property. This runs the danger of not being workable in practice either in terms of its implementation or in terms of “fairness” to those who had bought properties in anticipation of extending them at a later date.

QUESTIONS - Small Dwellings

- Q19 Do you think there is a particular need to retain small dwellings (1 or 2 bedrooms)? YES/NO
- Q20 If YES which of the options listed do you consider offers the best approach and why?
Option 1....
Option 2
Option 3

Replacement and Extension of Dwellings in the Countryside

- 2.6.74 The impact of extensions and replacements in the countryside can be considerably more than in a built up area both in terms of the natural and physical environment and the local social and economic structure. This is essentially because there are fewer properties located within the rural areas.

- 2.6.75 There are a number of concerns and questions that have been raised regarding the implementation and reasoning behind the current policy, including
- Impact of development on the built and natural environment;
 - The desire or otherwise to retain a range of dwelling size and type within the rural areas to meet existing and future needs; and
 - Whether permitting the extension of small dwellings takes them out of the price range of local people and more likely to be used as second homes.
- 2.6.76 First and foremost, it is essential to be clear about what the policy is seeking to achieve. With regard to impact on the environment, issues such as visual impact, massing etc will be important. The Option to be considered is whether or not within those areas designated for their landscape interest, particularly the AONB, replacements and extensions should be more tightly restricted than elsewhere within the countryside? Or, is it appropriate to continue to deal with applications on their merits under a more general criteria included within a design policy(s)? A solution may include withdrawing permitted development rights on replacement dwellings; or placing a limit on existing dwellings restricting the size of an extension, for example so as not to exceed what would be acceptable under permitted development rights.
- 2.6.77 The second question relates to the social and economic structure of the area. If development is to be restricted within the countryside, should the Council be seeking to place a further restriction on existing dwellings within this area? The reason for restricting extensions would be to look to retain a range of size and type of dwellings within these smaller settlements, in an attempt to enable balanced communities to exist. Extensions in this regard would be those which result in the creation of an additional bedroom(s). Conversely, it could be argued that to restrict people's ability to extend their property in an area where new development is limited and opportunities to move within the locality are few and far between, that the policy would result in existing communities being broken up, contrary to its stated intention. Any such approach would in any case need to be supported by evidence provided through the Housing Needs Survey and a local housing market assessment.
- 2.6.78 It should also be noted that to adopt an approach that seeks to limit the extension of existing dwellings in the countryside, would be inconsistent with that put forward for consideration within the urban areas. In the urban areas it is suggested that new one and two bedroom units would be subject to a condition attached to the planning permission which would restrict their extension where this would create an additional bedroom space. The "fairness" of such an approach will be an issue. The argument for a split approach would have to be on the basis of the differing circumstances between these two types of area and the issues they raise.
- 2.6.79 If however the reasoning behind the policy is to look to find a way to ensure that what dwellings exist remain available for the benefit of the local population (i.e. locally affordable) as opposed to second homes, this is a different issue. An alternative approach which aims to restrict extensions or re-builds to those dwellings which are occupied as a sole or main residence may offer a way forward. Such an approach would need to be monitored.

THE ISSUE OF SECOND HOMES

- 2.6.80 The presence of second homes has been raised as an issue, particularly within the more rural areas. Concerns have been expressed that second homeowners take dwellings out of the reach of the local community both in terms of price and access where the availability of accommodation is limited. The percentage of second homes across the district is 4.39%. However, some settlements experience a very high level of second home ownership such as Walberswick and Dunwich at 30%. This can impact on the character of the settlement.

Alternative Options

- 2.6.81 Under normal circumstances, the Council is not in a position to be able to stop people buying properties as second homes. The Council could consider restricting the occupancy of dwellings in a particular area to local people. Such a policy approach is exceptional even at

the national level. At this time there is insufficient evidence, most noticeably from the Housing Needs Survey, to suggest that such radical policies are required, particularly given the implications for human rights. However, the issues will be monitored and, if necessary, addressed in a subsequent review.

- 2.6.82 There is also a debate to be had in the role that second homes potentially play as tourist accommodation this is set out under the tourism section.

QUESTION - Second Homes

Q21 Do you consider the presence of second homes to be a problem in your area?
YES/NO

If YES, which area, and why?