



Indicative Housing Requirement – Bungay Neighbourhood Plan

August 2021

An indicative housing requirement has been assessed for Bungay Town Council, upon their request, for the purposes of producing the Bungay Neighbourhood Plan.

The indicative housing requirement has been assessed following the methodology and proforma set out in East Suffolk Council's 'Neighbourhood Plans – Indicative Housing Requirements – Methodology (July 2021)'. This should be read alongside this assessment. The methodology is attached at the end of this paper and can also be viewed at www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Preparing-a-Neighbourhood-Plan/Neighbourhood-Plans-Indicative-Housing-Requirements-methodology.pdf. The methodology has also been endorsed by the Broads Authority. The Council has liaised with the Broads Authority in undertaking this assessment, as the Bungay Neighbourhood Plan area falls partly within the Broads.

The information presented in this paper is for the purposes of assessing an indicative housing requirement only. The focus is on the level of growth that is appropriate and that is likely to be able to be accommodated. Considerations around mitigating impacts and identifying appropriate locations for growth are the remit of Bungay Town Council in preparing the Neighbourhood Plan, and therefore it is expected that the considerations and topics set out in the table, such as environmental constraints and infrastructure, would be revisited in further detail and with the relevant bodies, as appropriate, in the preparation of the Plan. The assessment of an indicative housing requirement has not been subject to Strategic Environmental Assessment or Habitats Regulations Assessment.

Assessing the indicative housing requirement

The proforma below contains the criteria and considerations applied in identifying an indicative housing requirement for the Bungay Neighbourhood Plan.

Indicative Housing Requirement – Bungay Neighbourhood Plan (August 2021)

Neighbourhood Area	
Name of Neighbourhood Area	Bungay
Area covered by Neighbourhood Area	Bungay parish (See map in Appendix A)
Neighbourhood Plan period	2020-2036
Relevant Local Plan	Waveney Local Plan (2014-2036) (adopted 20 th March 2019) www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf Broads Local Plan (2015 – 2036) (adopted 17 th May 2019) www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf
Local Plan Strategy	
Growth identified in Local Plan:	The figures below are taken from page 122 of the Waveney Local Plan and set out the quantum of growth planned for in Bungay in the Local Plan.
<i>Completions (within plan period, as set out in Local Plan)</i>	30 dwellings (2014 – 2017)
<i>Permissions as at start of plan period</i>	42 dwellings (excludes 150 homes with permission within site WLP5.2)
<i>Allocations in Local plan</i>	Approximately 485 dwellings (WLP5.1 Land east of St. Johns Road, Bungay – approximately 85 dwellings) (WLP5.2 Land west of St. Johns Road, Bungay – approximately 400 dwellings)
<i>Total</i>	557 dwellings (see page 122 of Waveney Local Plan) There is no specific housing growth planned for Bungay in the Broads Local Plan.
Percentage of total growth above based on Local Plan contingency	Waveney Local Plan contingency is 12% $557 \times 0.12 = 67$ dwellings
Position in Settlement Hierarchy	Bungay is identified as a 'Market Town' in the Settlement hierarchy. Paragraph 1.20 of the Local Plan explains that "The strategy allows for reasonable levels of development in the market towns. All of Waveney's market towns have good employment opportunities, a good range of services and facilities and attractive town centres making them sustainable locations for growth."
Local Plan Strategy	The strategy of the Waveney Local Plan for Bungay is described as: "The strategy for Bungay allows for a modest level of growth which protects the sensitive landscape around the town which is well related to the Broads. New employment land has already been permitted to the south of the town as part of a mixed-use development which will help improve the self-containment of the town. The Local Plan allocates land for 485 new homes (of which 150 already have planning permission) in addition to the 72 on unallocated sites which already have permission or completed since the beginning of the plan period. New housing will help contribute funding towards the delivery of a new fit for

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	<p>purpose community centre for the town as well as support the shops and services of the town centre.” (paragraphs 5.1 and 5.2 of the Waveney Local Plan)</p> <p>6% of new residential development in the Local Plan is distributed to Bungay.</p> <p>Based upon the methodology, it is not expected that housing would be planned for in the Broads area and the indicative requirement for that part of the Neighbourhood Area is zero.</p>
Population of the Neighbourhood Area	5,112 (2019 population estimate – source Suffolk observatory ¹)
Current Local Housing Need figure	<p>Former Waveney district = 374 dwellings per annum (April 2021²)</p> <p>This figure is the same as the housing requirement in the Waveney Local Plan.</p>
Local needs	
Local needs for housing identified through a local housing need assessment where relevant	<p>A Housing Needs Assessment has been produced by Aecom (March 2018). This does not identify an overall housing requirement but does identify needs related to housing size, affordable housing, and housing for older people.</p> <p>The Housing Needs Assessment recommends that most new housing would need to be two or three bedroom, however based on the conclusions it is considered that this could be addressed by policies related to housing mix. The evidence does not point to a need for further housing growth to accommodate this.</p> <p>The Housing Needs Assessment identifies a housing need for older people of between 110 and 218 specialist dwellings, however notes that these do not all need to be provided in the Neighbourhood Area and that these figures do not take account of current provision. The assessment concludes that these do not need to be accounted for in the Neighbourhood Plan housing target as there is some overlap.</p> <p>The Housing Needs Assessment identifies around 150 households with the potential to be formed, however concludes that no further adjustment is needed provided that a substantial share of new dwellings are one and two bedroom.</p> <p>It is not considered that the housing needs assessment would therefore inform an adjustment the indicative housing requirement, although the Qualifying Body may wish to consider appropriate housing mix policies to address the needs identified.</p>

¹ www.suffolkobservatory.info/population/report/view/62646f73d23e489098a5cdad7a116eed/E04009490

² Calculated using the standard methodology set out in the Planning Practice Guidance on Housing and Economic Needs Assessment, using the following data:

www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/13107housepricetoworkplacebasedearninratioforformerlocalauthorities2019to2020

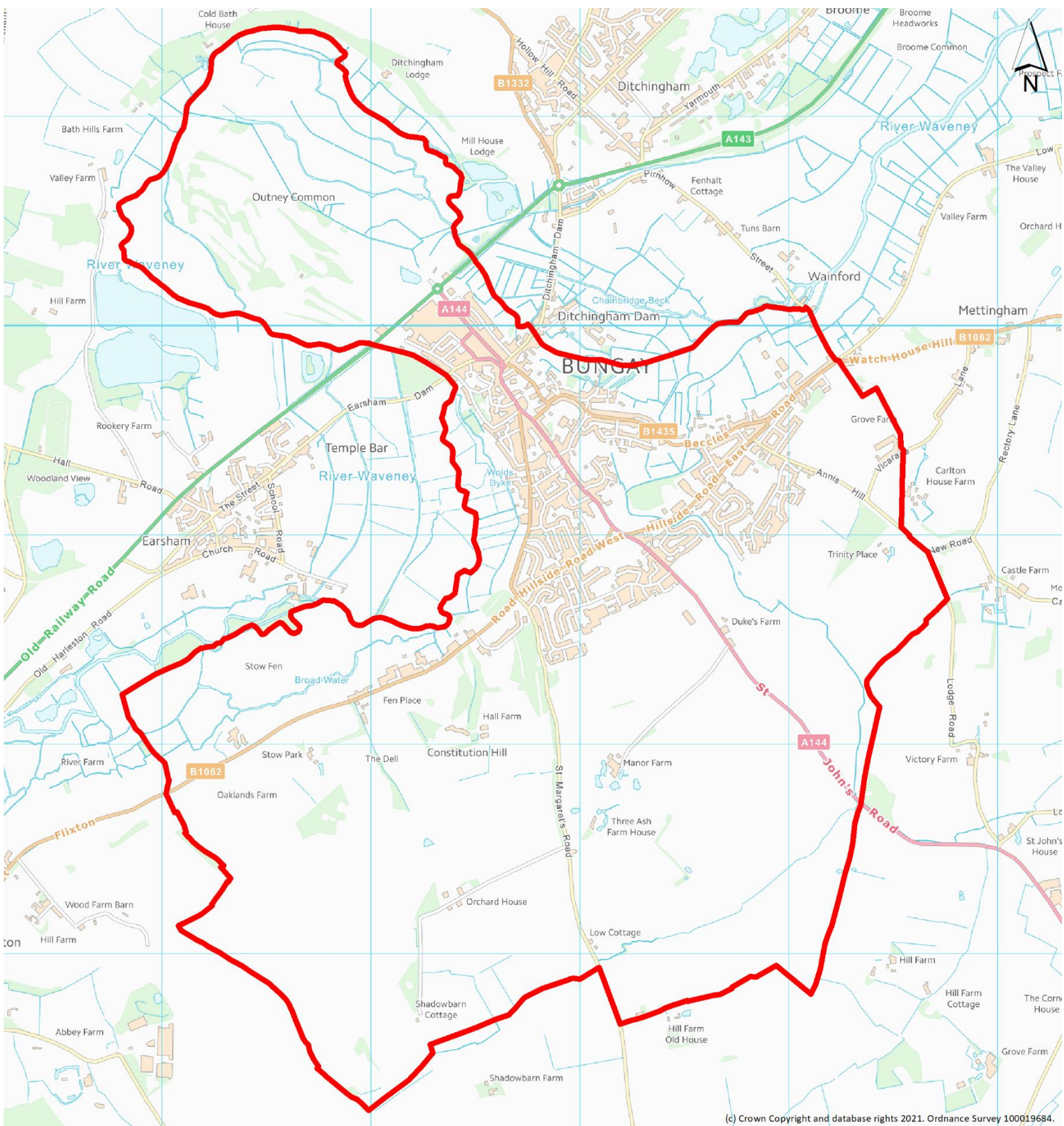
www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables

Constraints	
Environmental designations	<p>The Local Plan, in its Strategy for Bungay, explains that this strategy allows for modest growth which protects the sensitive landscape around the town which is well related to the Broads. The issues in Bungay are set out in the Local Plan (page 16) which explains that due to the River Waveney and marshland to the north, east and west of the town it has been forced to grow in a southwards direction.</p> <p>The northern part of Bungay falls within the Broads and is therefore covered by the Broads Local Plan. The NPPF explains that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and therefore this limits options for Bungay to grow in a northward's direction.</p> <p>Flood risk is a key constraint. The Strategic Flood Risk Assessment produced to support the Waveney Local Plan shows that the east, west and north of the town is very closely bounded by mostly Flood Zone 3, and some Flood Zone 2. Some land to the north of the A144 is in Flood Zone 1 however is within the Broads.</p> <p>The Local Plan allocates sites to the south of the town leaving some, but limited, scope for further development on the edges of the town outside Flood Zone 2 and 3.</p> <p>The potential for Bungay to grow further than is allocated in the Plan is relatively limited, however there is scope for some growth and the requirement above does not seem to be of a scale that is unreasonable in this respect.</p> <p>The map in Appendix B shows the key environmental considerations.</p>
Infrastructure capacity	<p>Information on infrastructure capacity is set out in Appendix C. In general, the nature of some infrastructure is less likely to create a constraint on growth but should be considered through the preparation of the Neighbourhood Plan.</p> <p>This information demonstrates that there are unlikely to be infrastructure constraints of a scale or nature that would prevent the indicative figure above of approximately 67 dwellings coming forward.</p>
Other issues and local information	<p>Discussion has taken place with representatives of the Bungay Neighbourhood Plan group which did not identify any further issues that should be considered in this assessment.</p> <p>No other constraints have been identified that would have an effect on the indicative requirement of 67.</p>

Conclusions	
Indicative Housing Requirement	<p>Based upon the evidence above an indicative housing requirement of 67 dwellings is considered appropriate for Bungay Neighbourhood Plan to plan for, if seeking to plan for housing.</p> <p>The requirement is consistent with the strategy of the Waveney Local Plan, is consistent with meeting the housing needs identified and is likely to be able to be accommodated bearing in mind the constraints identified.</p> <p>Based upon the methodology, it is not expected that housing would be planned for in the Broads area and the indicative requirement for that part of the Neighbourhood Area is zero.</p> <p>The Plan covers the period to 2036 and therefore there is no need to consider needs beyond the Waveney Local Plan period.</p>
Permissions granted since base date of data in Local Plans on unallocated sites	<p>The Neighbourhood Plan period is understood to be 2020 – 2036. Given that the indicative housing requirement relates to the strategy of the Waveney Local Plan, additional net permissions since the date of the data contained on page 122 of the Local Plan are provided below.</p> <p>As at 1.4.2020, the base date of the Neighbourhood Plan period, there were 9 additional net commitments (permissions/completions) that were not included in the 42 outstanding permissions identified in the Local Plan as at 31.3.2017. These can be counted towards meeting the indicative housing requirement.</p> <p>Within the Neighbourhood Plan period, a further 5 net dwellings have received planning permission since 31.3.2020 and up to 31.3.2021. These can also be counted towards meeting the indicative housing requirement.</p> <p>The methodology paper contains guidance on the role of windfall development (i.e. that not allocated) in planning for the housing requirement.</p>

The figure provided is based upon the Council's methodology which has been developed in line with current national legislation, policy and guidance. The figure may need to be revisited should there be any changes to national legislation, policy or guidance, or should there over time be any relevant changes to data or information that has informed the assessment.

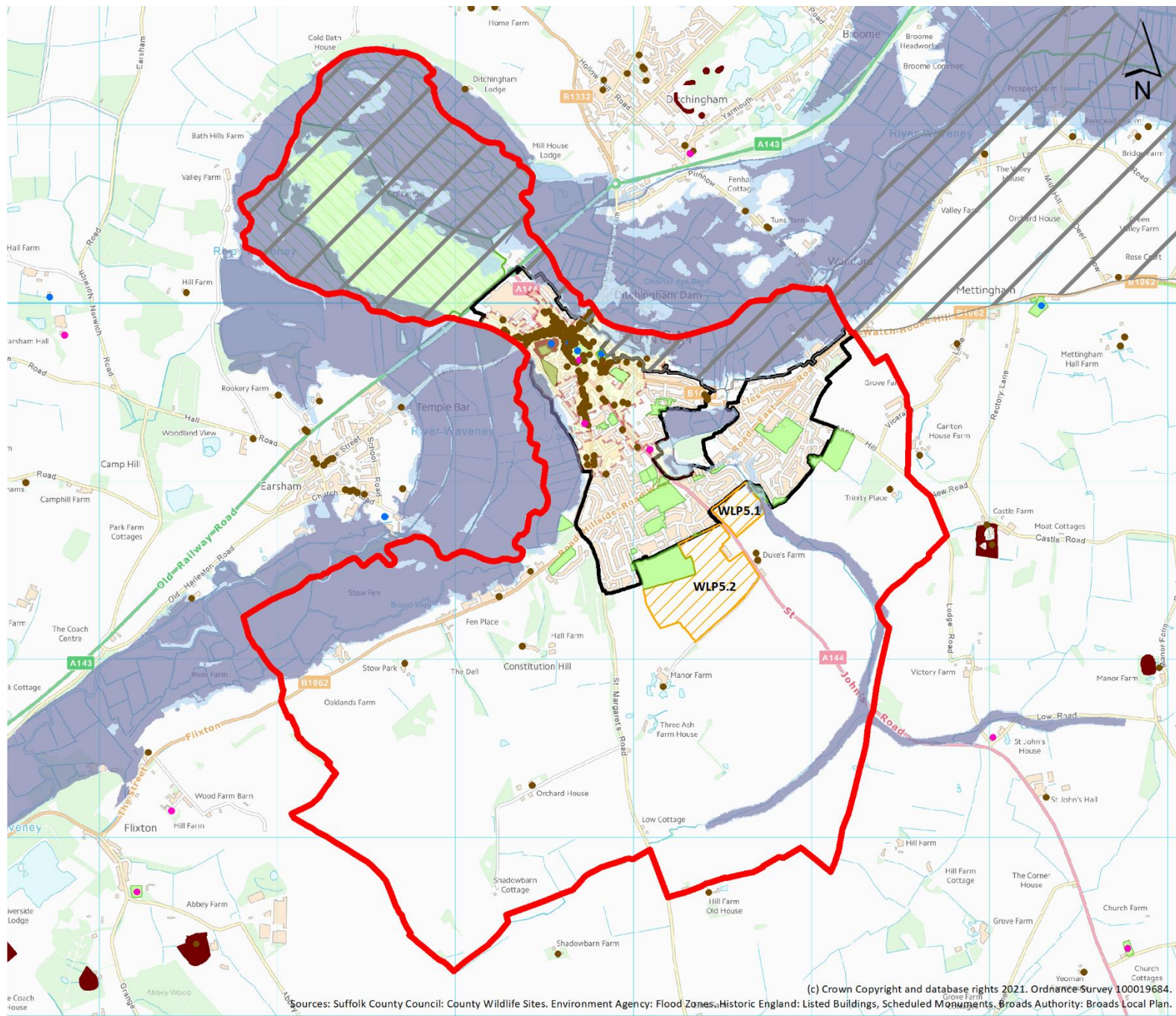
Appendix A: Bungay Neighbourhood Plan area

















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 Bungay Neighbourhood Area

Appendix B: Bungay Neighbourhood Plan area – key constraints



- | | | | |
|---|--|---|--|
|  | Bungay Neighbourhood Area |  | Flood Zone 3 |
|  | Broad's Authority Area within East Suffolk |  | Flood Zone 2 |
|  | Housing Allocation |  | Open space on land, play space, sports fields and allotments (DM7) |
|  | Settlement Boundary |  | Conservation Area |
|  | Grade I Listed Building |  | County Wildlife Site |
|  | Grade II Listed Building |  | Open Space |
|  | Grade II* Listed Buildings |  | Scheduled Monument |

Appendix C: Infrastructure information

Consideration has been given to whether there are any infrastructure issues that may present an absolute constraint on development. Whilst some types of infrastructure may be less likely to present an absolute constraint on growth, information on a range of infrastructure types, as covered in the Infrastructure Delivery Framework of the Local Plan, have been included for completeness. The information is presented for the purposes of considering an appropriate indicative housing requirement only and engagement should take place with infrastructure providers during the production of the Neighbourhood Plan.

Infrastructure type	Current position
Highways	<p>Comments from Suffolk County Council (March 2021): Suffolk County Council as Local Highway Authority have reviewed the following Neighbourhood Plan housing allocations using the Suffolk Transport Model. The model illustrates current and future forecast capacity constraints at junctions and links (roads between junctions). The model contains forecasts up to 2036 and includes committed development and traffic growth, providing a forecast of whether the proposed dwelling numbers will result in a severe cumulative impact upon the highway network.</p> <p>None of the junctions or links within Bungay are forecast to operate at or beyond their capacity in the 2036 forecast year, therefore the level of development proposed is very unlikely to result in a severe cumulative impact so the Local Highway Authority does not object to the principle of this level of development within Bungay.</p> <p>Please note that the above exercise only provides a high level assessment of potential traffic impact within a specific area and without details of proposals, it is not possible to provide a definitive assessment of whether a proposal will be acceptable to the Highway Authority. Developments will still be expected to provide a suitable assessment of their traffic impact based on the scale of development proposals.</p> <p>Assessments have been based on the limited information supplied and do not bind Suffolk County Council on its response to any future planning applications.</p>
Early Years Education	<p>New setting proposed on WLP5.2 in Local Plan. The exact nature of this setting will be determined with Suffolk County Council at the time of a planning application.</p> <p>At present it is not possible to establish the current provision for Early Years as the effects of Covid-19 are not yet fully known, so it is not possible to establish current surpluses or deficits.</p> <p>However, the quantum of development being proposed is unlikely to produce a significant number of pupils. The current multiplier used by Suffolk County Council estimates that 0.1 pupils will be created per new dwelling. The existing or proposed settings are likely to be</p>

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	sufficient, or some small expansions may be needed. However, this should be checked with Suffolk County Council.
Primary Education	<p>Comments from Suffolk County Council (March 2021): Bungay Primary School</p> <p>Based on the current data held by Suffolk County Council regarding proposed housing developments in the catchment area of Bungay Primary School, pupil forecasts indicate that it is likely that the existing accommodation will be able to accommodate additional pupils generated from the 67 dwellings currently proposed by East Suffolk Council for the neighbourhood plan. Our primary forecasting is carried out in June of each year and this position may change if forecasts indicate demographic or further housing growth before the neighbourhood plan is delivered.</p>
Secondary Education	<p>Comments from Suffolk County Council (March 2021): Bungay High School</p> <p>Based on the current data held by Suffolk County Council regarding proposed housing developments in the catchment area of Bungay High School, pupil forecasts indicate that the school is expected to exceed 95% capacity over the current forecast period. A project is currently being developed to provide additional accommodation at Bungay High School and therefore it is likely that contributions would be requested from additional development in the area to contribute towards the expansion of accommodation at the school.</p>
Further Education	There isn't data currently on needs or provision for this, however the quantum of development would likely only result in a very small number of students.
Health	There are no specific health infrastructure issues identified in Bungay. The Local Plan identifies that there will need to be an increase in the capacity of services with the proposed growth. Any additional growth in the Neighbourhood Plan may increase this need.
Utilities	<p>There are currently no issues with water supply identified in the Bungay Area. The local water recycling centre has capacity for development as outlined in the Waveney water Cycle Study which supports the Local Plan (page 42)³.</p> <p>There are no known issues with electricity supply.</p> <p>No known issues regarding household waste recycling centres that would limit development.</p>
Police	No issues related specifically to Bungay have been raised by the police during the production of the Waveney Local Plan. The quantum of development is unlikely to cause an issue.
Libraries	There are some issues with looking at library provision at present, partly due to the unknown effects of Covid-19, and partly due to recent changes in the libraries team at Suffolk County Council. In general, development will require improvements to the library

³ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Waveney-Water-Cycle-Study.pdf>

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	service however this not considered to be a limitation to development.
Community Centres/Facilities	Bungay was identified in the Infrastructure Study which supports the Waveney Local Plan as being in need of a more modern community centre. CIL has been allocated to the development of a new community centre in Bungay, therefore this need should now be satisfied.
Green Infrastructure	The Green Infrastructure Strategy (2015) notes that there is a need for flat amenity green space in Bungay and potentially a satellite park (although this would likely be unviable for the number of dwellings being considered). Provision of a MUGA was also suggested. Although these wouldn't be barriers to development, these should be considered to be delivered where appropriate.



Neighbourhood Plans – Indicative Housing Requirements

Methodology

July 2021

Background

This note sets out the Council's approach to providing an indicative housing requirement to those Qualifying Bodies who wish to plan for housing in their Neighbourhood Plans, beyond that which is planned for in the Local Plan, and who ask the Council for an indicative housing requirement. The methodology in the note will also apply to the full extent of a Neighbourhood Area where it extends into the Broads Executive Area, within which the Broads Authority is the local planning authority. This methodology has been produced with input from the Broads Authority.

National Policy Context

In relation to establishing housing requirements in Neighbourhood Plans, paragraphs 66 and 67 of the 2021 National Planning Policy Framework (NPPF) state:

66. *Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*

67. *Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.*

Where a housing requirement for a Neighbourhood Area has not been set in the Local Plan, paragraph 67 is relevant. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) sets housing requirements for a number of Neighbourhood Areas that were designated at the time of plan preparation. This note applies to requests for housing numbers for other Neighbourhood Areas.

The [Planning Practice Guidance on Neighbourhood Planning](#)¹ (PPG) provides further guidance (see Appendix 1 to this note).

Whilst guidance is contained in the PPG, there is no nationally set methodology for identifying indicative housing requirements for Neighbourhood Plan areas.

Neighbourhood Plans are not required to plan for housing, however when doing so Qualifying Bodies² may request a housing figure from the Council. Where this figure has not been set in a strategic policy in an adopted Local Plan, this requirement is 'indicative' and will need to be tested at the Neighbourhood Plan Examination. It is therefore crucial that any indicative housing requirement is fully justified.

Whilst the local planning authority could choose to not provide a Qualifying Body with a housing requirement, the Council has a statutory duty to support the production of Neighbourhood Plans and also considers it is good practice to provide a housing requirement figure where this is requested. As well as supporting Qualifying Bodies, this also enables a consistent approach across East Suffolk.

Plan-area-wide housing requirements for the Suffolk Coastal and Waveney Local Plan areas have been established through the Local Plans. Housing requirements for the part of the Broads within the former Waveney district have also been established within the Broads Local Plan.

Where a Neighbourhood Plan chooses to plan for additional housing growth, the indicative housing requirement does not need to be met in total through allocations, and policies which support windfall housing development could form part of the approach in a Neighbourhood Plan. It should be noted however that where Neighbourhood Plans look to benefit from paragraph 14 of the NPPF in terms of housing land supply they will be expected to include allocations in accordance with the NPPF and the PPG.

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2>

² I.e. Town or Parish Councils or Neighbourhood Forums.

The purpose of this methodology paper is to set out how the Council will assess an indicative housing requirement for Neighbourhood Plan areas, when asked to do so.

Adopted Local Plans

The East Suffolk Council - Suffolk Coastal Local Plan was adopted on 23rd September 2020 and the East Suffolk Council - Waveney Local Plan was adopted on 20th March 2019. The Broads Local Plan was adopted on 17th May 2019.

The East Suffolk Local Plans contain strategies to meet the housing requirements identified for the Plan period, and both contain contingencies (i.e. allocate more housing than is needed) to provide confidence that the housing requirements will be met. However, Town and Parish Councils may aspire for growth above that which the Local Plan expects to come forward within their communities and both the Suffolk Coastal and Waveney Local Plans provide some specific scope for additional growth to come forward.

The Suffolk Coastal Local Plan sets out housing requirements for the plan period (2018-2036) for those areas with a designated Neighbourhood Plan area at the time of production of the Final Draft Local Plan (which was approved by the former Suffolk Coastal District Council in January 2019 for publication and submission). Housing requirements for these areas are set out in Policy SCLP12.1 Neighbourhood Plans of the adopted Local Plan, as shown in Appendix 2 to this note. Policy SCLP12.1 also acknowledges that other Neighbourhood Areas will be designated and states “Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.”

The Waveney Local Plan, having been prepared prior to the publication of the 2019 NPPF, does not set out housing requirements for designated neighbourhood areas. However, the Plan is supportive of the production of Neighbourhood Plans and is supportive in principle of Neighbourhood Plans planning for housing growth. Policy WLP1.1 Scale and Location of Growth states “Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.” Policy WLP1.2 Settlement Boundaries states “Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other policies of this Local Plan.”

For Neighbourhood Areas in the ‘countryside’, the strategies of the Local Plans expect limited growth to come forward and as such the indicative housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative

approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.

The Broads Local Plan was also prepared prior to the 2019 NPPF and does not contain housing requirements for Neighbourhood Areas. It is not expected that additional new housing will be planned for within the Broads through Neighbourhood Plans. This is because the more rural parts of a parish tend to be within the Broads. There are also constraints such as landscape impact, distances from services and flood risk.

Neighbourhood Plans are required to be in general conformity with the strategic policies of the relevant Local Plan in order to meet the basic conditions and proceed to referendum.

It is advised that early discussion takes place between the Qualifying Body and the Council to discuss the aims of planning for housing and the issues the Qualifying Body are seeking to address.

Methodology

There is no nationally set methodology for assessing indicative housing requirements for Neighbourhood Plan areas. East Suffolk Council and the Broads Authority have therefore considered practise from elsewhere, and relevant parts of the NPPF, PPG and Local Plan policies in developing a methodology.

The following table sets out the considerations and assessments that will be made when the Council is asked to provide an indicative housing requirement to a Qualifying Body. The process is not solely a calculation as there are a range of factors to consider, in accordance with the NPPF and the PPG.

The Planning Practice Guidance states that the local authority's 'local housing need' can form the starting point, however due to the recent adoption of Local Plans which contain strategies to meet housing requirements and set out, in policy, the overall approach to additional growth in Neighbourhood Areas, the Local Plan strategy is considered to form an appropriate starting point. However, the authority's local housing need, as calculated through the Government's standard methodology, will change over time and could be a factor that needs to be considered through the production of the Neighbourhood Plan. The reference to current local housing need figures is therefore included in the methodology table alongside the housing requirement that the Local Plans are planning for, for reference.

In order to identify an initial starting point which reflects the strategy of the Local Plan, a proportionate increase on the level of growth already planned for in the Neighbourhood Area should be calculated. This is to be done through reference to the contingency provided for in either the Suffolk Coastal Local Plan or the Waveney Local Plan. The contingency is the level of growth planned for in the Local Plans over and above the housing requirement. It is important to note that this is a starting point, and the methodology allows for

consideration of other local issues or the aspirations of the Town/Parish Council in arriving at an indicative figure.

The contingency provided for by housing allocations in the Suffolk Coastal Local Plan is 16.5% and in the Waveney Local Plan is 12%, before windfall is factored in³. Although the contingency itself represents growth that is already allocated, applying this percentage increase acts as a reasonable starting point for identifying a level of additional growth that would be consistent with the strategy of the Local Plan. This will provide a figure which can then be ‘tested’ against a range of considerations and revised and refined accordingly as necessary.

As an example of using this as a starting point, if a Neighbourhood Area in Waveney is anticipated to deliver 100 dwellings in the Local Plan period (based on completions since the start of the Plan period, existing permissions, and allocations as set out in the Local Plan) the starting point for an indicative housing requirement for the Neighbourhood Plan would be 12 dwellings as this is 12% more.

To test whether this figure is appropriate or should be increased or decreased, a number of qualitative factors should be considered. This approach reflects paragraphs 101 and 102 of the PPG (see Appendix 1) which advocates an approach of balancing needs with protection and taking into consideration spatial policies. The focus is on whether this level of growth is likely to be able to be accommodated and whether it is appropriate, i.e. are there any ‘showstoppers’ or absolute constraints. Considerations around mitigating impacts and identifying appropriate locations for growth are the remit of preparing the Neighbourhood Plan, and therefore it is expected that the considerations set out in the table, such as environmental constraints and infrastructure, would be revisited in the preparation of the Plan including in cases where no ‘showstopper’ constraints have been identified.

Whilst it is for Qualifying Bodies to choose whether to plan for housing or not, the PPG (paragraph 103) states that neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. As the Local Plans contain strategies to meet, and exceed, the housing requirements for the Local Plan areas, the provision of additional housing figures to Neighbourhood Plan areas should be seen as providing an opportunity for an appropriate level of additional growth. In this respect the figures are not intended as minimums or maximums but as an indication of the level of the approximate level of growth that could be planned for. The Council will however expect Qualifying Bodies who have asked for an indicative housing requirement to take a positive approach towards planning for it. For Qualifying Bodies who wish to meet the requirements of paragraph 14b) of the NPPF, indicative housing requirements need to be met in full and Neighbourhood Plans will need to include allocation(s), although a policy on windfall allowance may form a part of the approach.

Engagement between the Council and Qualifying Bodies will be vital during the process of establishing the indicative housing requirement, and the Council would like this to be a two-

³ The Broads Local Plan also contains a contingency, of 10.5%

way process with the Qualifying Body inputting on local information / matters that may be relevant.

Legislation requires that Neighbourhood Plans are screened for Strategic Environmental Assessment and Appropriate Assessment during their preparation. Should these assessments indicate constraints on planning for the indicative housing requirement, if necessary the indicative housing requirement could be revisited as a result.

A proforma is contained in Appendix 3. The Council will use the proforma to assess an indicative housing requirement for a Neighbourhood Plan area when asked to do so.

Criteria and considerations to be applied in identifying an indicative housing requirement	
Local Plan Strategy	
Growth identified in Local Plan	The Local Plans set out how much growth is expected to come forward in each settlement over the plan period. In the Suffolk Coastal Local Plan this is set out in Table 3.5. In the Waveney Local Plan this is set out for each of the towns and the Larger Villages and Smaller Villages.
Percentage of total growth above based on Local Plan contingency	For Neighbourhood Areas in Suffolk Coastal Local Plan area multiply figure above by 1.165 (16.5%) For Neighbourhood Areas in Waveney Local Plan area (including those that fall within the Broads) multiply figure above by 1.12 (12%)
Position in Settlement Hierarchy	Consideration should be given to what type of contribution to the housing requirement the Neighbourhood Area will be expected to make in terms of its position in the Settlement Hierarchy. For Neighbourhood Areas in the 'countryside', the Local Plans expect limited growth to come forward and as such the housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.
Local Plan Strategy	What is the overall strategy of the Local Plan for the Neighbourhood Plan area (or a wider area in which it sits)? This should be a detailed explanation with reference to specific policies.
Population of the Neighbourhood Area	Population of the Neighbourhood Area taken from the latest ONS population projections, as a percentage of the Local Plan area population. This will not directly inform the figure but can form part of the consideration of the requirement in the conclusions below.
Current Local Housing Need figure	Include most recent local housing need figure for the Local Plan area, as calculated under the national standard methodology, alongside housing requirement of the relevant Local Plan for reference.

Local needs	
Local needs for housing identified through a local housing need assessment where relevant	A local housing needs survey may have been undertaken by the Qualifying Body. This may contain evidence of needs for specific types of housing or for the quantum of housing in the Neighbourhood Area. This should be considered in view of the information identified in terms of the Local Plan's strategy for the area – is there likely to be a need that will not be met through the Local Plan policies?
Constraints	
Environmental designations and assets	<p>Environmental designations include:</p> <ul style="list-style-type: none"> • Special Protection Areas and Special Areas of Conservation (note a Habitats Regulations Assessment carried out as part of the production of the Neighbourhood Plan would consider potential harm to the integrity of these sites – for the purposes of establishing an indicative housing requirement consideration should be given to the location of these sites and any relevant conclusions in the HRA for the Local Plan). • Sites of Special Scientific Interest (SSSIs) • The Broads • Areas of Outstanding Natural Beauty • Scheduled monuments • Listed Buildings • Conservation Areas • Listed Parks and Gardens • National Nature Reserves <p>The purpose of considering these is not to identify every possible impact but to consider whether the nature, location or scale of any designations or assets is likely to impact on the scale of growth that could be achieved.</p> <p>Consideration to be given to the extent and location of any areas of flood zone 2 and 3 and whether this is likely to have an impact on the scale of growth that could be achieved. Coastal erosion should also be considered for coastal Neighbourhood Areas.</p>
Infrastructure capacity	<p>Consideration to be given to infrastructure which may present an absolute constraint on development for the plan period, or would require a scale of growth inconsistent with the strategy of the Plan to address issues.</p> <p>This will require consultation with the relevant infrastructure providers where other up to date evidence is not available or existing evidence needs to be verified. This could include:</p> <ul style="list-style-type: none"> • Highways capacity (Suffolk County Council) • Education (Primary, Secondary, Further) and Early Years provision (Suffolk County Council) • Water supply and waste water treatment (Anglian Water and Essex and Suffolk Water)

	<p>Other infrastructure which may be less likely to present an absolute constraint on growth, but which may nevertheless require consideration in the preparation of a Neighbourhood Plan, includes:</p> <ul style="list-style-type: none"> • Health • Utilities • Police • Libraries • Community Centres • Household Waste Recycling Centres • Green Infrastructure <p>Where constraints exist but these are thought to be possible to overcome through mitigation the housing requirement will not need to be adjusted.</p> <p>Through the production of the Neighbourhood Plan the Qualifying Body will be expected to engage further with infrastructure providers where relevant in relation to the site assessment and the identification of any infrastructure requirements.</p>
Other issues and local information	<p>Opportunity for Qualifying Body to identify any relevant information on aspirations, local issues or other factors that could be taken into account.</p> <p>Any other identified constraints. This may include the supply of suitable sites if a robust site assessment process has already been carried out as part of the production of the Plan, however site assessment should be viewed as a separate exercise and be informed by the indicative housing requirement.</p>
Conclusions	
Indicative Housing Requirement	Based upon the above a qualitative and quantitative reasoning should be provided.

Net housing permissions granted since the date of the data contained in the adopted Local Plans, that is not on an allocated site, can be counted towards meeting the requirement. This figure will be provided by the Council.

How the Council will apply this approach

- The Council will provide an indicative housing requirement to a Qualifying Body, upon request.
- The Council will apply the methodology set out in this Note when assessing a housing requirement. The Council will liaise with the Broads Authority where a Neighbourhood Area falls partly within the Broads.
- The Council will usually provide a draft figure within 6 weeks of a request, and will keep the Neighbourhood Plan group informed of any deviation from this.

- The Council will discuss the draft figure with the Qualifying Body.
- The Council will support the Qualifying Body in any consideration of the housing requirement through the Examination process as appropriate.
- The Council, with relevant stakeholders, will keep the methodology under review, in particular to reflect any Examiner's conclusions and changes in national policy or guidance.

Appendix 1 – Extract from Planning Practice Guidance

Can a neighbourhood plan come forward before an up-to-date local plan or spatial development strategy is in place?

Extract...

Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.

Paragraph: 009 Reference ID: 41-009-20190509

How should a housing requirement figure be set for designated neighbourhood areas?

The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.

Within the administrative area of a National Park, the Broads Authority or a Development Corporation (where planning powers are conferred), each local planning authority should set a housing requirement figure for the proportion of the designated neighbourhood area which is covered by their administration.

Paragraph: 101 Reference ID: 41-101-20190509

How should local planning authorities identify indicative housing requirement figures for designated neighbourhood areas, when these are needed?

Where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing

requirement figure. They can use the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.

Proactive engagement with neighbourhood plan-making bodies is important as part of this process, in order for them to understand how the figures are reached. This is important to avoid disagreements at neighbourhood plan or local plan examinations, and minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted.

Paragraph: 102 Reference ID: 41-102-20190509

How should neighbourhood planning bodies use a housing requirement figure that has been provided to them?

Where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make.

Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.

When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan.

Paragraph: 103 Reference ID: 41-103-20190509

Are housing requirement figures for neighbourhood areas binding?

The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority). The strategic policies will, however, have established the scale of housing expected to take place in the neighbourhood area.

Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that housing requirement figures will be set in strategic policies, or an indicative figure provided on request. Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative figure, it will need to be tested at examination.

Paragraph: 104 Reference ID: 41-104-20190509

What happens if the local planning authority does not provide a housing requirement figure for a designated neighbourhood area that wishes to plan for housing?

Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the 'basic conditions'.

Paragraph: 105 Reference ID: 41-105-20190509

Appendix 2 – Housing requirements under Policy SCLP12.1 of the Suffolk Coastal Local Plan

Policy SCLP12.1: Neighbourhood Plans

The Council will support the production of Neighbourhood Plans in identifying appropriate, locally specific policies that are in general conformity with the strategic policies of this Local Plan.

Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the minimum housing requirements set out below:

Neighbourhood plan area	Minimum number of dwellings ⁴
Aldringham cum Thorpe	Existing Local Plan allocation of 40 dwellings, plus small scale additional development and windfall
Bredfield	20
Earl Soham	25
Easton	20
Framlingham	100 in addition to allocations in 'made' neighbourhood plan
Great Bealings	Housing development as per countryside policies
Kelsale cum Carlton	20
Kesgrave	20
Leiston	100 in addition to allocations in 'made' neighbourhood plan
Martlesham	20. This is in addition to allocation Policy SCLP12.25.
Melton	Existing Neighbourhood Plan allocation of 55, plus windfall
Playford	Housing development as per countryside policies
Rendlesham	Existing Local plan allocations of 100, plus windfall
Saxmundham	Small scale additional development and windfall. This is in addition to Local Plan allocation Policy SCLP12.29 which allocates land for the South Saxmundham Garden Neighbourhood which will deliver approximately 800 dwellings ⁵ .
Wenhaston with Mells Hamlet	25
Wickham Market	70 This is in addition to Local Plan allocation Policy SCLP12.60 (in Pettistree Parish, adjoining Wickham Market)

Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.

Should the housing growth identified for Neighbourhood Plans not be delivered, the Council will address this through a future Local Plan review.

⁴ In addition to existing permissions, allocations and dwellings with resolution to grant (as at 31.3.18). See Table 3.5.

⁵ The South Saxmundham Garden Neighbourhood is within the Benhall Parish and Saxmundham.

Appendix 3 – Proforma for assessing the housing requirement for a Neighbourhood Area

Neighbourhood Area	
Name of Neighbourhood Area	
Area covered by Neighbourhood Area	<i>XX Parish</i>
Neighbourhood Plan period	<i>This is relevant to determining the proportionate number of years for a housing requirement.</i>
Relevant Local Plan	<i>Waveney or Suffolk Coastal Broads Local Plan for any that are partly within the Broads</i>
Local Plan Strategy	
Growth identified in Local Plan	<i>Enter figures below</i>
Completions (within plan period, as set out in Local Plan)	
Permissions as at start of plan period	
Allocations in Local plan	
Total	
Percentage of total growth above based on Local Plan contingency	<i>In Suffolk Coastal this is 16.5% In Waveney this is 12%</i>
Position in Settlement Hierarchy	<i>Taken from the relevant Local Plan</i>
Local Plan Strategy	<i>Explanation of the relationship of the Neighbourhood Plan area to the strategy of the Local Plan, including relevant policies</i>
Population of the Neighbourhood Area	<i>Taken from the latest Census, as a percentage of plan area population</i>
Current Local Housing Need figure	<i>For relevant Local Plan area, as calculated using the standard method</i>
Local needs	
Local needs for housing identified through a local housing need assessment where relevant	<i>Where evidence of local housing need has been undertaken as part of the preparation of the Neighbourhood Plan, consider whether there are likely to be local needs that would not be met through the Local Plan.</i>
Constraints	
Environmental designations	<i>Explain whether and how this would affect achievement of the figure identified above Include flood risk</i>
Infrastructure capacity	<i>Explain whether and how this would affect achievement of the figure identified above</i>
Other local issues and information	<i>Explain whether and how this would affect achievement of the figure identified above</i>
Conclusions	
Indicative Housing Requirement	<i>Housing requirement as a figure, proportionate to the Neighbourhood Plan period. Provide justification based upon the evidence above.</i>

Permissions granted since base date of data in Local Plans on unallocated sites	<i>This will count towards meeting the housing requirement</i>
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