

Local Housing Need Assessment

In respect of:

**The Fruit Farm,
Station Road, Bentley**

Prepared by:

Pioneer Property Services Ltd

On behalf of:

Mixbrow Limited

Date:

31st July 2023



Contents:

Page:

EXECUTIVE SUMMARY	2
1 INTRODUCTION	8
2 POLICY CONTEXT.....	9
2.1 NATIONAL POLICY	9
2.2 LOCAL POLICY	13
2.3 SUMMARY	21
3 LOCATION CONTEXT	24
3.1 APPLICATION SITE LOCATION	24
3.2 STUDY AREA	26
3.3 LOCAL CHARACTERISTICS	28
3.4 SUMMARY	35
4 HOUSING NEED	36
4.1 OVERVIEW	36
4.2 STANDARD METHOD ALIGNED LOCAL HOUSING NEED	39
4.3 STUDY AREA DEMOGRAPHIC MODELLING	40
4.4 AFFORDABLE HOUSING NEED	45
4.5 HOUSING TENURE AND MIX	49
4.6 SUMMARY	54
5 HOUSING SUPPLY	58
6 CONCLUSION.....	61
7 APPENDICES.....	69

EXECUTIVE SUMMARY

- Bentley is described as a ‘Hinterland Village’ within the adopted Babergh Core Strategy (“CS”) Policy CS2 and lies within the Capel St Mary ‘Functional Cluster’ (“CSM FC”) and is situated within the Parish of the same name (i.e. Bentley Parish).
- On behalf of Mixbrow Limited Pioneer Property Services Ltd has undertaken a review of local housing needs within the environs of Bentley Parish and the wider CSM FC and, to a lesser extent, across the wider Rural Area (“RA”), using existing evidence and undertaking additional local housing needs modelling.
- Housing proposals within locations such as Bentley, whilst within a rural setting, still fall within the context of the long established Government objective of ‘significantly boosting the supply of homes’. This objective is maintained within the National Planning Policy Framework (“NPPF”) which also refers to ‘inadequate’ housing as one of the ‘potential barriers to investment’ to be addressed by Plan policies.
- Nationally, we remain in the middle of a national housing crisis. The NPPF confirms that providing housing (of all tenures) to meet local housing needs will have a significant role in retaining local services and community facilities. Underproviding housing to meet locally assessed needs will also result in worsening affordability and significant weight is routinely applied in Planning Appeals to the benefit of Affordable Housing provision where there is an unmet need for such housing.
- Analysis has been undertaken to look at a range of local characteristics based on 2021 Census data in the Parish and the CSM FC; this suggests high levels of couple households aged over 66 compared to the district on average, although there are low levels of single people aged under 66 and lone parent families in the Parish and CSM FC. In both the Parish and the CSM FC there is a lower proportion of younger working age households than older (50+) working age and retired older people. The Parish and the CSM FC is characterised by a higher proportion of detached homes than across the district.
- Affordability is suggested to be more challenging in Bentley than across the district, with median house prices suggested by Office for National Statistics (“ONS”) data to be c.£433k in the Copdock and Washbrook Ward in which the

village lies compared to £330k across the district as at September 2022 (i.e. the latest ONS published comparable date for both areas).

- The emerging Joint Local Plan (“JLP”) is yet to be found sound and further work / examination is to be undertaken through ‘Part 2’ in terms of the proposed settlement hierarchy and development distribution. The adopted CS relies on an overall housing requirement figure that is over five years old and includes affordable housing and housing distribution policies that precede the current NPPF. It remains the case that there is a policy vacuum in the district with regards to housing distribution within the context of which housing proposals should be prepared and determined.
- The East Bergholt Court Judgment sets out how ‘local need’ for the purposes of CS Policies CS2 and CS11 can be defined within ‘Functional Cluster’ sub-areas and defines local need as ‘housing need in the village and its cluster, and perhaps in areas immediately adjoining it’ – the Judgment, whilst made in response to proposals within a Core Village, does not direct that Hinterland Villages should be treated differently to Core Villages.
- The Bentley Neighbourhood Plan Policy (“NHP”) policy wording supports that housing mix preferences should be applied flexibly, having regard to tenure specific factors and, where publicly available, updated housing needs evidence. Whilst housing needs analysis has been undertaken in the 2020 Bentley Housing Needs Assessment (“HNA”), this provides conclusions on housing and Affordable Housing need that reflect older data sources than are now available (i.e. 2011 as opposed to 2021 Census data) and relies on emerging policy approaches to housing distribution that are not adopted and potentially subject to change through the preparation of Part 2 of the JLP.
- Within the context of the current national planning policy framework, taking local policy, Court Judgment and locational factors together (i.e. including the lack of an up to date housing needs based approach informing housing distribution across the rural parts of the district – the ‘Rural Area’ - in either adopted or emerging local policy and given the continuing lack of local policy clarity on the assessment of local overall housing needs at a sub-area level), it is entirely reasonable to consider the need for housing across the following study areas:

- Rural Area (“RA”)
 - Bentley Parish
 - Capel St Mary Functional Clusters (“CSM FC”)
- Analysis of local housing need (“LHN”) across these study areas drawing on the Standard Method and through additional demographic modelling at a sub-area level (taking account of 2014-based DLUCH household projections, ONS 2018-based household projections, 2021 Census population information, an affordability adjustment in line with the Standard Method and the application of a vacancy rate to convert household growth into homes) suggests a minimum Local Housing Need (“LHN”) for c.3,795 homes in the RA, from c.414 to c.589 homes in the CSM FC and from c.52 to c.64 homes in Bentley Parish between 2023 and 2037 (i.e. to align with the remaining part of the emerging 2018 - 2037 Plan and NHP period). However, increased migration would see a greater overall housing requirement.
 - Furthermore, the lower end of the Parish / CSM FC LHN range for 2023 to 2037 (52 and 414 respectively) which is based on a district wide standard method calculation using 2014-based household projections and assuming housing need arising at a rate that is proportionate with that across the district, is lower than that based on the demographic scenarios modelled taking account of: the distribution of age and sex within the population at a sub-area level, 2018-SNPP based on household projections and having regard to potential 2021 Census population changes (which range from 60 to 54 and 565 to 589 respectively 2023 to 2037).
 - In conjunction with a review of committed supply based on extant planning permissions, these LHN outputs suggest that there will be significant shortfalls in overall housing supply across the RA (i.e. totalling 1,362 during 2023 to 2037) during the remaining emerging Plan period unless additional supply sources to those already permitted are secured.
 - In the CSM FC based on based on 2014-SNPP and 2018-SNPP based household projections and having regard to potential 2021 Census population changes, it is suggested that an increase in overall housing supply to that already committed through extant planning permissions will need to be identified if shortfalls of up to c.240 homes during 2023 to 2037 are to be avoided. Even under the standard method based lower LHN outcome shortfalls of c.65 homes would accrue.

- Similarly, in Bentley Parish an increase in overall housing supply will need to be identified if shortfalls of up to c.47 homes during 2023 to 2037 (the remaining NHP period) are to be avoided.

Shortfall in Overall Housing Supply – Market and Affordable Housing 2023 - 2037

	Study Area	Overall Local Housing Need 2023 - 2037	Total Committed Supply (based on HLPS and Planning Portal Analysis)	Shortfall / Surplus in Overall Housing Supply to Meet the Local Housing Need 2023-2037
Based on HLPS Standard Method LHN	Bentley Parish	52	17	minus 35
Demographic Modelling (PROJ1a, 1b and 1c and PROJ3)		52 - 64	17	minus 35 to minus 47
Based on HLPS Standard Method LHN	CSM FC	414	349	minus 65
Demographic Modelling (PROJ1a, 1b and 1c and PROJ3)		492 -589	349	minus 143 to minus 240
Based on HLPS Standard Method LHN	RA	3,795	2,433	minus 1,362

Source: Pioneer Analysis July 2023

- Specifically in respect of Affordable Housing the outlook is bleak unless the Council identify additional land for housing during the remaining emerging Plan / NHP period and achieves 35% Affordable Housing from each eligible site:

Shortfall in Affordable Housing Supply 2023 - 2037

	Study Area	Affordable Housing Need 2023 - 2037	If 35% Affordable Housing Achieved		If 21% Affordable Housing Achieved	
			Potential Supply @ 35% of Overall Committed Housing Supply (Sites of 10 units or more)	Shortfall / Surplus in Affordable Housing Supply to Meet the Affordable Housing Need 2023-2037	Potential Supply @ 21% of Overall Committed Housing Supply (Sites of 10 units or more)	Shortfall / Surplus in Affordable Housing Supply to Meet the Affordable Housing Need 2023-2037
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	Bentley Parish	14	0	minus 14	0	minus 14
Needed at 35% of Demographic Modelling Housing Need Outputs (PROJ1a, 1b and 1c and PROJ3)		18 - 22	0	minus 18 to minus 22	0	minus 18 to minus 22
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	CSM FC	110	88	minus 22	53	minus 57
Needed at 35% of Demographic Modelling Housing Need Outputs (PROJ1a, 1b and 1c and PROJ3)		172 - 206	88	minus 84 to minus 118	53	minus 119 to minus 153
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	RA	1,004	185	minus 819	111	minus 893

Source: Pioneer Analysis July 2023

- Despite having a 35% affordable housing policy in place in adopted Core Strategy policy, the Babergh and Mid-Suffolk Annual Monitoring Report 2021/22 (“AMR”) Table 4 suggests that over the past seven years (2015/16 to 2021/22) just under 21% of all net completions have been affordable housing. If this level of Affordable Housing provision (21%) persists shortfalls of c.893 Affordable Homes across the RA, up to 153 Affordable Homes across the CSM FC and up to 22 Affordable Homes across Bentley Parish could accrue by 2037.

- Outcomes within both the Ipswich and Waveney Strategic Housing Market Assessment Update (“SHMAU”) and the NHP HNA suggest an Affordable Housing tenure split of 50% rent and 50% sale to be appropriate when applied in the context of the current NPPF Affordable Housing definition.
- Having regard to updated 2021 Census informed housing mix projections for the district, aligning with the existing local characteristics of Bentley Parish / CSM FC, the following mix proportions are suggested to be broadly appropriate for the application site (subject to site specific design and masterplanning constraints):

Indicative Housing Mix Recommendations

	Market Housing	Affordable Housing	
		Rent	Ownership
1 bedroom	0%	65%	0%
2 bedrooms	25%		50%
3 bedrooms	45%	30%	50%
4+ bedrooms	30%	5%	0%
TOTAL	100%	100%	100%

Source: Pioneer Analysis July 2023

The inclusion of bungalows and two bedroom homes as supported by the NHP Policy BEN 2 may result in a greater focus on two and three bedroom market housing and a greater focus on two bedroom rented Affordable Housing than suggested in the above indicative mix.

- On balance, the analysis within this report suggests that for local housing need to be addressed during the 2023 to 2037 period across the Rural Area, the Capel St Mary Functional Cluster and Bentley Parish, an increase in overall housing supply is needed above that based on extant planning permissions.
- Policy CS11 is clear that Core and Hinterland villages have a role to play in delivering identified needs across the rural area. Whilst proportionate increases to settlements are ill defined within the adopted CS and the CS11 SPD, it is considered that the delivery of up to 24 new homes in Bentley is justified in the context of the significant projected local need identified for new market and Affordable Housing.
- The proposals respond positively to identified housing needs in both the wider Rural Area / Capel St Mary Functional Cluster and the Parish as outlined within this local housing need assessment. The proposals make a contribution towards the

authority's housing land supply and, critically, will assist with addressing Affordable Housing need.

- As a Hinterland Village location the provision of additional homes on the scale proposed on the application site to assist with meeting the assessed shortfall in homes available to meet the projected local housing need 2023 to 2037 and providing Affordable Housing (a significant community benefit) accords with the provisions within Policy CS11 for development within Hinterland Villages and is a significant benefit of material weight in favour of the planning application.

1 INTRODUCTION

- 1.1 This Report has been prepared on behalf of Mixbrow Limited, in conjunction with a planning application for the provision of up to 24 new homes (including Affordable Housing) on land at The Fruit Farm, Station Road, Bentley within Babergh district, to review local housing need based on existing evidence and additional housing needs modelling.
- 1.2 Section 2 of this report briefly examines the approach to housing provision in national and local policy, Section 3 of this Report examines the location context, establishing appropriate 'study areas' for assessment having regard to relevant geographies, policy and local characteristics.
- 1.3 Section 4 moves on to review local authority and Parish evidence base material on housing need and considers how housing need is likely to apply at a study area level based on housing need arising at a rate proportionate to that arising across the wider district and using sub-area level demographic housing projections. Affordable Housing need and housing tenure and mix requirements are also considered.
- 1.4 Section 5 considers data regarding planned housing supply across the study areas and Section 6 draws conclusions on the need for housing in addition to that already planned for and in terms of housing mix and tenure.

2 POLICY CONTEXT

2.1 National Policy

- 2.1.1 The National Planning Policy Framework (“NPPF”) was updated in July 2021. Contributing towards the achievement of sustainable development remains a ‘social objective’ within national planning policy and supporting national guidance to deliver a ‘sufficient number and range of homes to meet the needs of present and future generations’.¹ Development proposals which assist with meeting ‘present’ and ‘future’ housing needs (whilst having regard to the other objectives of national guidance) fulfil this objective.
- 2.1.2 The NPPF requires strategic policies to address objectively assessed housing needs during the plan period in accordance with the presumption in favour of sustainable development.² The NPPF seeks to ensure that the ‘needs of groups with specific housing requirements are addressed’ through the release of a ‘sufficient amount and variety of land’.³ Local authorities are expected to put planning policies in place that reflect assessed local housing need using the Standard Method which ensure the delivery of a sufficient supply of homes.⁴ Where alternative approaches are used these should similarly reflect current and future demographic trends and market signals.⁵ Planning policies should specify the type of affordable housing required (as defined in Annex 2 of the NPPF) where a need for it is identified.⁶
- 2.1.3 The responsibility of providing affordable housing (as defined in Annex 2 to the NPPF) falls to major developments (i.e. defined in the NPPF as sites of 10 or more dwellings / 0.5 hectares or more) on which ‘at least 10%’ of the total number of homes should be ‘available’ for affordable home ownership as part of the overall affordable housing contribution from the site subject to a limited number of exceptions (including in respect of Exception Sites).⁷
- 2.1.4 The NPPF refers to ‘inadequate’ housing as one of the ‘potential barriers to investment’ to be addressed by plan policies and sets out that plan policies should be ‘flexible enough to accommodate needs not anticipated in the plan’ and ‘enable a rapid response to changes in economic circumstances’.⁸

¹ Paragraph 8, NPPF

² Paragraph 11, NPPF

³ Paragraph 60, NPPF

⁴ Paragraphs 61 and 62, NPPF

⁵ Paragraph 61, NPPF

⁶ Paragraph 63, NPPF

⁷ Paragraphs 64 to 65, NPPF

⁸ paragraph 82, NPPF

2.1.5 Whilst paragraph 66 of the NPPF refers to local authorities identifying a housing requirement for neighbourhood plan areas which ‘reflects the overall strategy for the pattern and scale of development’, all strategies will need to be underpinned by the NPPF requirement to significantly boost housing supply and provide sufficient housing to meet housing need.

2.1.6 Under the ‘Supporting a prosperous rural economy’ section the NPPF sets out that ‘Planning policies and decisions should enable’:

“d) The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”

(paragraph 84, page 24, NPPF)

Housing provision to meet local housing needs will have a significant role in assisting with meeting the above objective, particularly where the existing housing supply level / housing costs are unlikely to retain / encourage working age households to remain or move into the community.

2.1.7 The NPPF further states that:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.”

(paragraph 85, page 24, NPPF)

Whilst this is not specific to housing requirements, community needs will include housing as well as other essential infrastructure items and amenities.

2.1.8 National Planning Practice Guidance (“NPPG”) published online to support the NPPF and updated from time to time provides guidance on how the Standard Method should be applied to calculate local housing need in the Housing and Economic Needs Assessment section.

2.1.9 The NPPG also includes a separate section on the 'Housing needs of different groups'. Guidance on housing delivery in rural areas is provided and, when considering policy formulation, states that:

"People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of housing can also be important for the broader sustainability of rural communities."

(Paragraph: 009 Reference ID: 67-009-20190722, NPPG)

The NPPG goes on to state that:

"A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness."

(Paragraph: 009 Reference ID: 67-009-20190722, NPPG)

2.1.10 The NPPG refers to neighbourhood plans being able to allocate 'additional sites' to sites allocated through an adopted plan. The NPPG confirms that the level of evidence required to demonstrate local need should be appropriate, and whilst a Housing Needs Survey approach is presented as a possible approach the NPPG wording does not prescribe this as the only method, thus confirming that other 'appropriate' assessments are acceptable.

2.1.11 In fact, the Housing and Economic Needs Assessment section of the NPPG provides guidance only on the use of secondary data sources as opposed to primary survey methods for the assessment of affordable housing need confirming that secondary data based assessments for housing need (market or Affordable Housing) are, therefore, an appropriate and valid approach.

2.1.12 The NPPF affordable housing definition at bullet point 'd' describes that housing provided under the heading 'other affordable routes to home ownership':

"...is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market."

(Annex 2, NPPF)

2.1.13 The NPPG confirms that ‘all households whose needs are not met by the market can be considered in affordable housing need’⁹ and provides guidance on how affordable housing need can be assessed.¹⁰ The NPPG states that estimates of current and projected households lacking their own homes or unable to meet their housing needs in the market (i.e. in affordable housing need) should include estimates of:

“the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”

(Housing Needs of Different Groups, Paragraph 006)

The inclusion of these households is an important point when considering overall levels of affordable housing need and affordable housing tenure split proposals.

First Homes

2.1.14 Through national guidance (“FHG”) issued on the 24th of May 2021 in conjunction with a Written Ministerial Statement (“WMS”) the Government confirms that 25% of all Affordable Housing secured through developer contributions will be sought as First Homes, subject to transitional provisions in terms of plan making and existing / advanced applications and some exemptions.¹¹ First Homes are subject to national criteria in terms of form and eligibility including; a price cap (after a minimum 30% discount has been applied) of £250,000 (or £450k inside London), purchasers must be First Time Buyers¹² with household incomes not exceeding £80,000 (or £90k inside London).

2.1.15 The Department for Levelling Up, Housing and Communities (“DLUHC”) have recently confirmed (as set out in the Greater Cambridge First Homes Interim Position Statement paragraph 13 which, whilst relating to a different local authority area, includes comments relevant to all local authorities with existing adopted plans) that there is ‘no specific legislative requirement to deliver First Homes’ and that where existing Local Plans have been adopted prior to the transitional arrangement there is no need to update these Plans early to reflect First Homes - the Plan can continue to apply until it is due for an update. This reflects that such a change in Policy will need to be subject to scrutiny during

⁹ Housing and Economic Needs Assessment Paragraph 018

¹⁰ Housing and Economic Needs Assessment, paragraphs 019 - 024

¹¹ The Written Ministerial Statement confirms that where developments are exempt from paragraph ‘64’ (now 65) in the NPPF then these developments are also exempt from the First Homes requirement (albeit such schemes are not precluded from providing First Homes).

¹² Defined in paragraph 6 of schedule 6ZA of the Finance Act 2003

the independent Local Plan examination process, including in respect of any economic impacts on housing delivery and in terms of housing need.

Emerging National Planning Policy

- 2.1.16 Further significant proposed changes to the planning system set out within the Government consultation ‘White Paper: Planning for the Future’ (published on the 6th of August 2020 – “HWP”) make it clear that the delivery of affordable housing within developments remains of crucial importance.¹³ The current Planning System is identified as not leading to enough homes being built and that this persistent undersupply is resulting in housing becoming ‘increasingly expensive’.¹⁴
- 2.1.17 The HWP introduces the Government’s proposals for Planning Reform through the introduction of an Infrastructure Levy, committing to this delivering at least as much Affordable Housing as at present.¹⁵ The Levelling Up Bill, through which the Government will look to implement these reforms is accompanied by a ‘Levelling Up and Regeneration’ Policy Paper (“PP”) which timetables the changes to planning procedures to start taking place from 2024.
- 2.1.18 Until the Bill and associated reforms are in place the current NPPF and NPPG and underpinning legislation continue to provide the settled national position in respect of housing and Affordable Housing delivery.

2.2 Local Policy

- 2.2.1 The approach to housing delivery within Babergh district remains that set out within the Core Strategy adopted in 2014, which, in conjunction with saved policies in the Babergh Local Plan (Alteration No.2), forms the Development Plan. The Core Strategy plans for the 2011 to 2031 period.

Overall Housing Provision

- 2.2.2 The key policies relating to overall housing provision in the district are CS2 ‘Settlement Pattern Policy’, CS3 ‘Strategy for Growth and Development’ and CS11 ‘Strategy for Development for Core and Hinterland Villages’.

¹³ Paragraph 4.20, HWP

¹⁴ Page 12, HWP

¹⁵ Paragraph 4.21, HWP

2.2.3 Policy CS2 of the Core Strategy states that:

“The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail, etc.) in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish / community / neighbourhood plans.”

(emphasis added)

2.2.4 Policy CS2 defines ‘Bentley’ as a Hinterland Village and Map 4¹⁶ in the CS describes Bentley as falling within the Capel St Mary ‘Functional Cluster’; Functional Clusters are described as having been derived based on a 2010 Growth Review¹⁷ and:

“...the way that people may live in one part of the cluster but use other places within it for essential, low-order, everyday services and facilities...”

(Executive Summary, CS)

2.2.5 However, there is no clear reference to, or evidence of, the housing distribution being based on an assessment of housing need. Rather, the housing distribution is based on a “policy-on” growth strategy, which directs 60% of planned growth to the three urban areas of Sudbury/Great Cornard, Hadleigh and the Babergh Ipswich Fringe and 40% of the planned growth being distributed across the rural areas.

2.2.6 In respect of development in the countryside Policy CS2 states that:

“In the countryside, outside the towns / urban areas, Core and Hinterland Villages defined above, development will only be permitted in exceptional circumstances subject to a proven justifiable need.”

This places an increased emphasis on delivering housing within the Core and Hinterland Villages. However, it should also be viewed in the context that the Core Strategy was

¹⁶ Page 20, CS

¹⁷ Executive Summary, CS

anticipated to be accompanied by a site allocations document to complete the suite of development plan documents. In the absence of such a document, Babergh district Council adopted the Rural Development and Policy CS11 SPD (referred to below) for determining applications adjacent to but outside defined settlement boundaries.

- 2.2.7 In terms of the quantum of housing growth Policy CS3 includes a target for the delivery of 5,975 new homes across the district between 2011 and 2031 (i.e. 299 homes per annum) of which 1,050 are planned for distribution within the 'Core and Hinterland Villages' (53 homes per annum over 20 years).
- 2.2.8 On this basis the allowance for 'rural growth' across all Core and Hinterland Villages in the 2011 to 2031 twenty year period equates to c.18% of overall housing growth for the district as a whole.
- 2.2.9 However, targets for housing provision in the CS should not be viewed as a ceiling or cap on development. The NPPF requires strategic housing policies to address objectively assessed needs in accordance with the presumption in favour of sustainable development and it is unclear that the planned distribution of housing within the CS reflects the distribution of housing need.
- 2.2.10 As in Policy CS2, Policy CS3 refers to sites in the 'Core and Hinterland Villages' being allocated in a 'Sites Allocations Document' 'to encourage and manage the delivery of the 1,050 dwellings...".
- 2.2.11 Policy CS11: 'Strategy for Development for Core and Hinterland Villages' sets out the circumstances under which development in Core and Hinterland Villages will be permitted. For Core Villages these include addressing (to the satisfaction of the local planning authority) the 'locally identified need' for housing and 'specific local needs such as affordable housing'.
- 2.2.12 Under Policy CS11 Hinterland Villages are expected to both address the issues set out in respect of Core Villages and additional requirements including meeting:

"...a proven local need, such as affordable housing or targeted market housing identified in an adopted community local plan / neighbourhood plan..."

(CS11, Core Strategy)

Policy wording goes on to state that the cumulative impact of development proposals will be assessed not in the context of the Hinterland Village alone, but also in the context of the wider functional cluster of villages.

2.2.13 Supporting text in paragraph 2.8.5.4 of CS11 sets out that:

“It is clear that the Core Villages identified are very varied and their needs and factors which influence what is an “appropriate level of development” will vary from village to village. This is especially the case where villages are situated within environmentally and visually sensitive landscapes, particularly the AONBs, and/or where they include conservation areas and heritage assets. These landscapes and heritage assets will be key considerations in the site allocation process, and when considering planning applications. Although a total number of 1,050 new dwellings is indicated in Policy CS3, this includes the ten Core Villages and all the Hinterland Villages. It is therefore important that this is not viewed as a sum simply to be divided equally or randomly between the number of villages listed. The approach to the distribution of new dwellings within Policy CS3 is to be driven by the function of the villages, their role in the community, and the capacity for a particular level of growth which will be guided by many factors and which will result in a different level of development being identified as ‘appropriate’ in different settlements, even those within the same category.... The approach will also provide for a degree of in-built flexibility within the catchment area.”

(paragraph 2.8.5.4, CS – emphasis added)

In this context a Hinterland Village could even be deemed capable of supporting a level of growth in excess of a Core Village where factors make this appropriate.

2.2.14 The East Bergholt High Court judgment,¹⁸ handed down in 2016, acknowledges the CS policies to be ‘far from clear’,¹⁹ but Mr Justice Mitting states that:

“A construction of Policies CS2 and 11 which combines both is possible. Development can take place outside the built-up area boundaries in the 2006 Local Plan or those to be shown in the Site Allocations document, if they fulfil the

¹⁸ East Bergholt Parish Council v Babergh district Council, Neutral Citation Number: [2016] EWHC 3400 (Admin), Friday, 9 December 2016

¹⁹ paragraph 16, East Bergholt Judgement

requirements of CS11 and if the Local Planning Authority are satisfied that the circumstances are exceptional and are subject to a proven justifiable need.”

(paragraph 18, East Bergholt High Court Judgment)

2.2.15 Whilst ‘proven justified need’ itself is not construed as having a separate meaning to ‘local housing need’, the Judgment does provide an interpretation of the meaning of ‘local housing need’ in Policy CS11 with Mr Justice Mitting stating that:

“I am satisfied that for the reasons explained, local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it.”

(paragraph 23, East Bergholt High Court Judgment)

Whilst the Judgment relates to a Core Village, the reasoning can apply to both Hinterland and Core Villages given that both are afforded the flexibility through CS2 and CS11 (when read together and in conjunction with supporting text in paragraph 2.8.5.7 of the CS) to see ‘appropriate’ development beyond their Built-Up Area Boundaries ‘subject to specified criteria’.

2.2.16 A Rural Development and Core Strategy Policy CS11 Supplementary Planning Document (“CS11 SPD”) was adopted in 2014 states in respect of Hinterland Villages that as:

“...hinterland villages are generally smaller and have fewer services and facilities it is expected that proposals for consideration under this policy will be small-scale. However, as with Core Villages, Hinterland Villages vary considerably in their size, scale and nature. Proposals for Hinterland Villages will need to be proportionate to the size of the existing settlement and take into account the type and number of facilities in the village, local opportunities and needs. Some Hinterland Villages may be able to accommodate higher levels of development than others.”

2.2.17 What is meant by ‘proportionate’ is not defined on a dwelling per head of population or other basis, but a key factor in determining the size of a proposal for a Hinterland Village will be the amount of ‘local housing need’. The CS11 SPD goes on to set out the following guidance:

“Developers should therefore set out how the proposal meets these locally identified needs. This should include an analysis of the number and types of dwelling in the village, an assessment of the need for housing in the village and the identification of

any gaps in provision. Proposals should provide affordable housing in accordance with Policy CS19. Proposals should therefore be accompanied by a statement that analyses the local housing, employment and community needs of the village and how they have been taken into account in the proposal. It is anticipated that such statements should be prepared in consultation with the Council using evidence from a number of sources.”.

(paragraph 14, CS11 SPD)

Whilst the above reflects the Council's preferences for local need assessments to be prepared on the basis set out in the SPD and through a process of consultation with the Council, these are not fixed requirements under pinned by CS policy wording.

2.2.18 The scale of the need identified within a particular functional cluster and its core and hinterland villages will, together with the context of community and employment needs, define whether the scale of a development is proportionate with the village in which it is proposed. The need for development is therefore intrinsically linked to the other relevant criteria contained within policy CS11, which in turn satisfies the requirements of policies CS2 (development being permitted in exceptional circumstances subject to a proven justifiable need). Whilst exceptional circumstances within policy CS2 are not defined, a proven justifiable housing need and the associated benefits that development can provide within core and hinterland villages would contribute towards meeting those exceptional circumstances.

2.2.19 Furthermore, since the East Bergholt Judgment (and following the adoption of the CS) the NPPF has been updated and it currently remains the case that this requires the application of the Standard Method when decision taking and considering housing land supply in the context of a plan that is over five years old and that has not been subject to review.

2.2.20 In this respect the overall housing delivery targets within the CS can be seen to be out of date. This is acknowledged in the Babergh district Council Housing Land Supply Position Statement (“HLPS”) published in December 2022.²⁰ The HLPS states that 417 dwellings per annum is the correct Local Housing Need (“LHN”) figure for the assessment of a five year

²⁰ paragraph 2.3, HLPS

housing land supply in the district, although the HLPS applies a buffer of 5% to establish a 5 year housing land supply requirement for 2,189 homes (i.e. 438 per annum).²¹

- 2.2.21 Further to the above policy analysis it is noted that when interpreting how local policy should be applied when assessing housing need in Hinterland Villages the Council are understood to be referring to a Planning Appeal²² outcome for a development proposal in Sproughton (in respect of which the reporting Inspector refers to the East Bergholt Judgment) as confirming that housing need in Hinterland Villages should be based only on that arising within the Hinterland Village and not have regard to unmet housing need within the wider FC.
- 2.2.22 However, the Appeal decision in paragraph 19 merely confirms (when read in the context of the preceding paragraph) that read together policies CS2 and CS11 support the provision of some development to meet needs within a Hinterland Village (“HV”) that ‘should meet a proven local need’ – this is not the same as saying only housing needs arising immediately within a HV should be met within the HV – i.e. the Inspector does not define ‘local need’ as only that arising within the HV and indeed could not do so on the basis of the East Bergholt Judgment as that Judgment makes no such statement.
- 2.2.23 In this regard, it is noted that the Inspector incorrectly suggests that paragraph 19 of the East Bergholt Judgment states that the meaning of local need (i.e. housing need in the village and its cluster and perhaps areas immediately adjoining it) applies only to Core Villages (“CV”). This is not the case.
- 2.2.24 Paragraph 19 of the Judgment provides commentary on what ‘Mr Taylor and Mr Harwood’ submitted to the Judge, but it does not provide the views of the Judge. The view of the Judge is provided in paragraph 21. Whilst commenting on CVs (as the Judge would do given that East Bergholt, the village in question, is a CV as opposed to a HV) paragraph 21 does not state anything that can be construed as excluding HV’s from being subject to a similar line of analysis to that taken by the Judge towards CVs when reading CS11 and CS2 together. The approach is set out by the Judge in paragraph 23 as quoted at paragraph 2.2.15 above – i.e. *“I am satisfied that for the reasons explained, local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it”* (paragraph 23, East Bergholt High Court Judgment).

²¹ Page 5, Table 2.2, DecHLPS

²² Reference APP/D3505/W/20/3256969, 22nd December 2020

2.2.25 Furthermore, the Inspector at paragraph 15 bases much of their preference for the extent of the study area to be limited to just the HV on supporting text in the Core Strategy as opposed to a reading of CS2 and CS11 policy wording together – which is the opposite of the approach in the East Bergholt Judgment where the policy wording is used to inform the Judgment made and the conclusion reached in terms of how ‘local housing need’ in Policy CS11 is to be defined.

2.2.26 The Judgment should take precedence over the Appeal Inspector’s report in terms of how Policies CS2 and CS11 are to be interpreted when defining local housing need. The Judgment defines local need as ‘housing need in the village and its cluster, and perhaps in areas immediately adjoining it’ and does not include any direction that HVs should be treated differently to CVs in respect of how local housing need is to be defined.

Affordable Housing

2.2.27 The approach to affordable housing within the adopted CS is set out within Policy CS19 ‘affordable housing’ – this seeks 35% affordable housing from all residential development in the district provided in a mix of tenures, types and sizes that reflects ‘established needs in the district’ reflecting the most up to date Strategic Housing Market Assessment or other relevant evidence.

2.2.28 The adopted CS affordable housing policies predate the current NPPF which sets out in paragraph 65 that on ‘major developments’ (i.e. 10 or more dwellings / 0.5 hectares or more) ‘at least 10% of the total number of homes’ should be expected to be made available for Affordable Home Ownership.

2.2.29 Although the Government introduced First Homes national planning practice guidance (“FPPG”) and an associated Written Ministerial Statement (“WMS”) seeking the delivery of First Homes in May 2021, this is not a legislative requirement and the WMS / PPG precedes the current iteration of the NPPF (July 2021) which does not refer to First Homes.

2.2.30 The FPPG / Written Ministerial Statement does not remove the requirement for new policies in respect of First Homes to be independently tested through the Local Plan process. Until amended Development Plan policies have been adopted, the provision of Affordable Home Ownership without any First Homes remains a Local Plan policy compliant approach.

Neighbourhood Plan

2.2.31 The Bentley Neighbourhood Plan (“NHP”) was made in December 2022 and draws on a Housing Needs Assessment undertaken by AECOM and published in January 2020 (this is considered in Section 4 below). The NHP confirms it has been prepared in the context of the adopted CS and that this identifies Bentley as a Hinterland village within the Capel St Mary Functional Cluster. The NHP does not appear to include housing allocations.

2.2.32 In respect of housing delivery the NHP includes Policy BEN 1 which relates to Affordable Housing on rural exception sites and BEN 2 on housing mix. Policy BEN 2 states that there shall be an ‘emphasis on providing a higher proportion of two-bedroom homes’ within schemes unless the tenures proposed are subject to circumstances that dictate otherwise, or where housing needs evidence for the NHP area identifies otherwise. This wording supports that housing mix preferences should be applied flexibly, having regard to tenure specific factors and updated housing needs evidence. Policy wording on space or other standards is not included, although a preference for Nationally Described Space Standards is stated within supporting text.

Emerging Local Policy

2.2.33 The emerging joint Babergh and Mid Suffolk Local Plan (“JLP”) was submitted to the Secretary of State on the 31st of March 2021 and, following a consultation on proposed modifications, further Hearing sessions were held during June 2023.

2.2.34 The emerging JLP is, therefore, yet to be found sound and remains subject to an ongoing examination process having been split into a Plan Part 1 and a Plan Part 2 with the latter being expected to address settlement hierarchy and housing distribution issues. Therefore, not only are the overall housing delivery targets within the CS out of date, but it remains the case that limited weight should be given to the proposed distribution of housing within the JLP at this stage.

2.3 Summary

2.3.1 Housing proposals within locations such as Bentley, whilst within a rural setting, still fall within the context of the long established Government objective of ‘significantly boosting the supply of homes’. This objective is maintained within the National Planning Policy Framework (“NPPF”) which also refers to ‘inadequate’ housing as one of the ‘potential

barriers to investment' to be addressed by Plan policies. The provision of housing (including Affordable Housing) and other community benefits to support local communities and retain the vitality and sustainability of settlements such as Bentley remains a key feature within national planning policy (and within policies CS2 and CS11 of the adopted core strategy).

- 2.3.2 National planning policy confirms that Plans should be flexible, able to adapt to rapid change and plan to address the objectively assessed need for housing as well as other uses, including needs within neighbouring areas where these cannot be met in-situ and in so far as this will accord with other policies in the NPPF.
- 2.3.3 In terms of local policy, whilst residential development proposed within Bentley falls to be determined within the context of the Babergh Core Strategy ("CS"), the CS is now over five years old and includes policy approaches that precede the current NPPF. The Bentley NHP adopted in December 2022 draws on a 2014 Household Survey and a 2020 Housing Needs Assessment based on secondary data analysis. NHP policy wording supports that housing mix preferences should be applied flexibly, having regard to tenure specific factors and, where publicly available, updated housing needs evidence.
- 2.3.4 In the CS Bentley is defined as a Hinterland Village in which residential development can take place where the scale and location of this reflects local housing need and settlement characteristics. However, the CS does not specify how 'local' housing need is to be assessed nor is there any clear basis in terms of housing need assessment for how the housing is distributed across the district.
- 2.3.5 The current status of the emerging JLP (which is yet to be found sound and requires further work through 'Part 2' in terms of the proposed settlement hierarchy and development distribution) and the adopted CS (which relies on an overall housing requirement figure that is over five years old and includes affordable housing and housing distribution policies that precede the current NPPF) results in a policy vacuum with regards to the housing distribution in the context of which housing proposals should be prepared and determined. Furthermore, housing requirements based on the Standard Method are not development caps.
- 2.3.6 The East Bergholt Court Judgment sets out how 'local need' for the purposes of CS Policies CS2 and CS11 can be defined within 'Functional Cluster' sub-areas and defines local need as 'housing need in the village and its cluster, and perhaps in areas immediately adjoining it'

– the Judgment, whilst made in response to proposals within a Core Village, does not direct that Hinterland Villages should be treated differently to Core Villages in this regard (contrary to commentary within a recent Planning Appeal report – APP/D3505/W/20/3256969).

- 2.3.7 In terms of the latest housing land supply requirement at a district level this is now informed by the December 2022 Housing Land Supply Position Statement (“HLPS”) which suggests an increased requirement for c.438 per annum (inclusive of a 5% buffer). Whilst the Government is in the process of updating national planning policy, until this process is complete the current approach remains as set out in the National Planning Policy Framework (“NPPF”) updated in July 2021.

3 LOCATION CONTEXT

3.1 Application Site Location

- 3.1.1 The application site, which falls within the administrative boundary of Babergh District Council, comprises of land used as a fruit farm located at the northern end of the village of Bentley (east of Station Road) and lying between built up areas of the village.

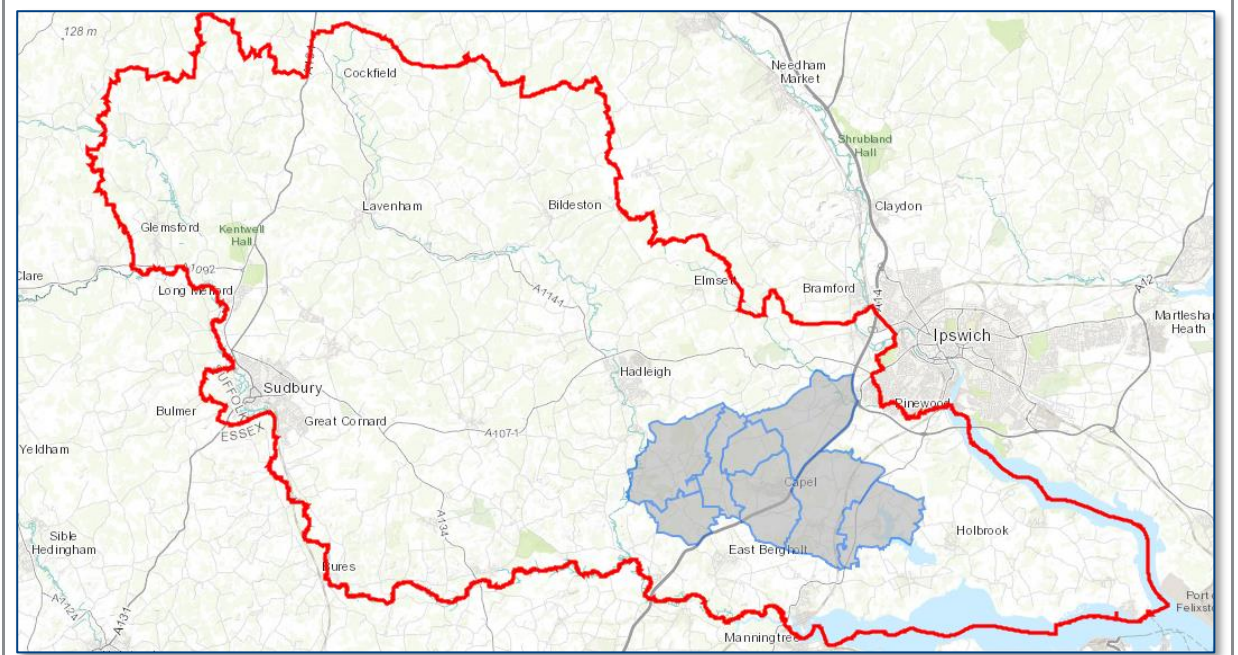
Figure 3.1.1 – Site Location Plan



Source: Mixbrow Ltd, July 2023

As is established in Section 2.2 above, Bentley is described as a 'Hinterland Village' within the adopted Babergh CS Policy CS2 and lies wholly within the Capel St Mary 'Functional Cluster' set out within Map 4 in the CS and is situated within the Parish of Bentley.

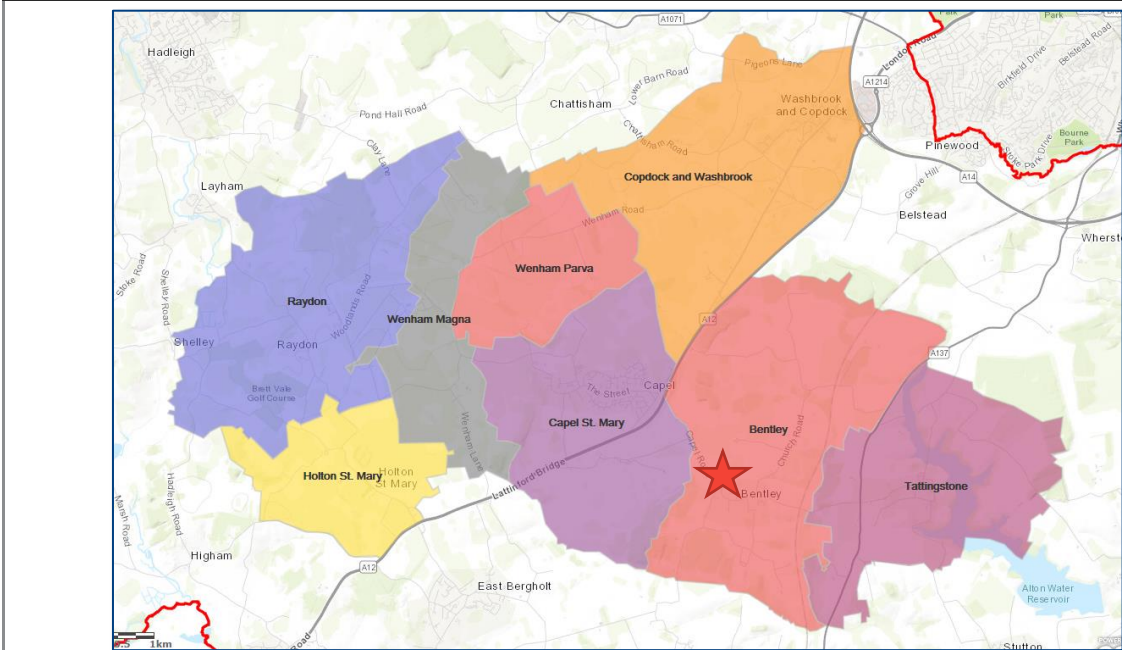
Figure 3.1.2 – Babergh Local Authority Area



Source: Office for National Statistics, OS Boundaryline, grey highlights the functional cluster in which Bentley lies

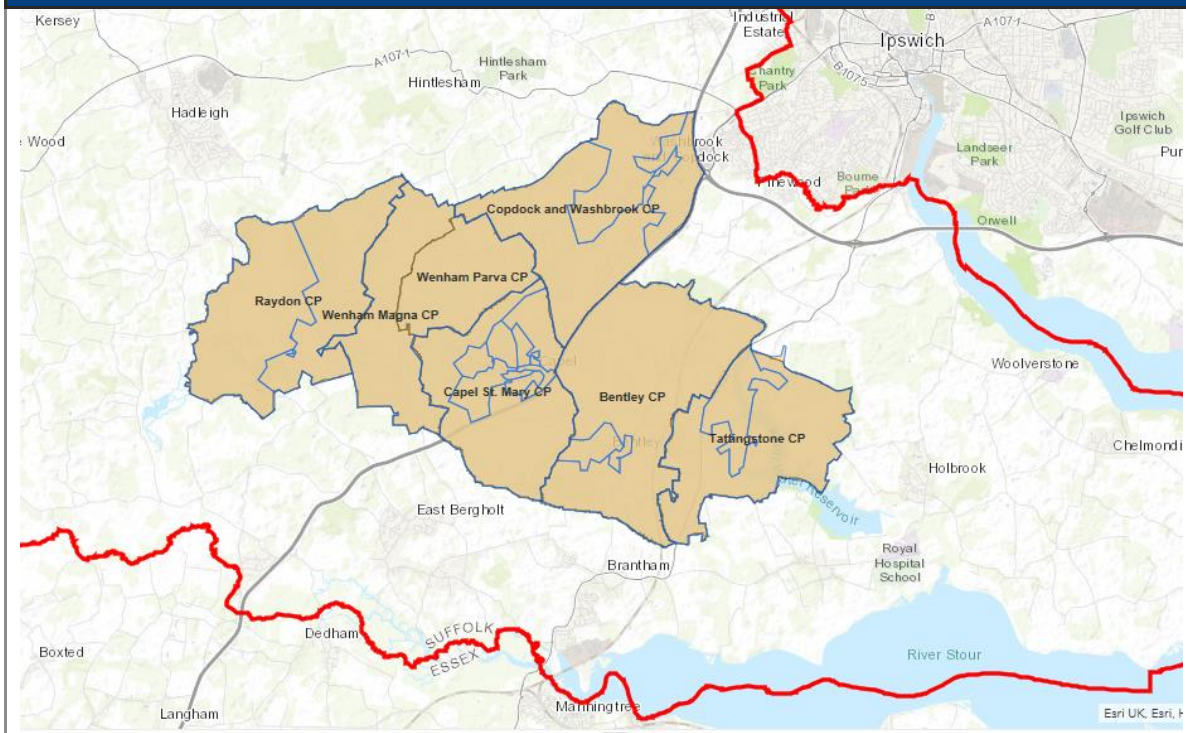
The Capel St Mary ‘functional cluster’ contains the villages of Capel St Mary, Bentley, Copdock and Washbrook, Holton St Mary, Raydon, Tattingstone, Wenham Magna, and Wenham Parva:

Figure 3.1.3 – Capel St Mary Functional Cluster Parishes



Source: Office for National Statistics (“ONS”), OS Boundaryline, red star denotes approximate site location

Figure 3.1.4 – Capel St Mary Functional Cluster ONS Output Areas



Source: Office for National Statistics ("ONS"), OS Boundaryline – see Appendix 2 for full list of Output Areas

3.2 Study Area

- 3.2.1 As established in Section 2.2 above the CS relies on outdated housing requirements and the number of homes planned for on the basis of this requirement are distributed without clear reference to how this distribution reflects housing need within the area typologies.
- 3.2.2 The NPPF requires strategic housing policies to address objectively assessed needs in accordance with the presumption in favour of sustainable development and it is unclear that the planned distribution of housing within the CS (which predates the current NPPF) reflects the distribution of current and future housing need.
- 3.2.3 The current NPPF, not itself in place when the East Bergholt Judgment on how local housing needs should be defined for the purposes of demonstrating housing need, requires housing to be provided to address objectively assessed housing needs (including meeting unmet needs with neighbouring areas), which at a local authority level are to be assessed using the Standard Method. The approach to be applied to housing needs assessment at a sub-area level remains unclear.

- 3.2.4 The emerging JLP remains in development and carries limited weight until it is found sound and adopted; the basis of JLP proposed distribution of housing across the district is also unclear with further work on settlement hierarchy and development distribution required for Part 2 of the Local Plan.
- 3.2.5 Where insufficient new housing provision is made within the locale of Bentley affordability in the village and the areas that lie within the same functional cluster and across the wider Core Village / Hinterland Villages will progressively worsen. Bentley is a rural Hinterland village within the wider Rural Area²³ of Babergh district.
- 3.2.6 Taking these policy and locational factors together, and given the lack of up to date housing needs based approach to housing distribution across the rural parts of the district and the continuing lack of clarity nationally on how sub-area housing needs should be assessed, when seeking how the application proposals (which are of a scale that is able to support not only housing but other community benefits) will assist with addressing housing need, it is appropriate to consider the need for housing across the Core Villages and Hinterland Villages as a whole (i.e. across the Rural Area as a whole).
- 3.2.7 The Babergh 'Rural Area' ("RA") in this report is defined as being comprised of all of the Parishes containing a Core or Hinterland Village or included within a Functional Cluster as set out within Map 4 of the CS and in line with CS Policy C2. Whilst the categorisation of these villages may alter through the emerging Part 2 Local Plan process this is yet to be examined and adopted and the CS therefore remains the point of reference for identifying the extent of the RA study area.
- 3.2.8 Bearing in mind the reasoning with the East Bergholt Judgment as to how local housing need in Babergh can be defined, it is also appropriate to consider more localised assessments at a Functional Cluster level (see Figure 3.1.2 above).
- 3.2.9 On this basis, a three tier study area is defined for the purposes of this report, although the primary focus should on the CSM FC study area in line with the reasoning within the East Bergholt Judgment:

²³ The Rural Area for the purposes of this report is defined as all of the settlements outside of the Great Cornard, Sudbury and Hadleigh urban areas that are listed within Functional Clusters in Map 4 of the CS - See Appendix 1

- Rural Area (“RA”) ²⁴
- Capel St Mary Functional Clusters (“CSM FC”) ²⁵
- Bentley Parish ²⁶

3.3 Local Characteristics

People and Household Characteristics

- 3.3.1 It can be seen that whilst there has been population growth in Bentley Parish and the CSM FC study areas it is less than across the East region as a whole.

Figure 3.3.1 – Population Estimates

	Mid-2011	Mid-2020	2021 Census**	% Increase
Bentley Parish	778	805	826	6%
CSM FC	6,356	6,671	6,554	3%
RA*	58,020	60,509	60,023	3%
Babergh district	87,900	92,700	92,336	5%
East Region	5,862,400	6,269,200	6,335,068	8%

Source: Mid-2020 Population Estimates and 2021 Census data, Office for National Statistics (“ONS”) ONS Crown Copyright Reserved

*Adjusted to remove duplications within 2011 and 2020 estimates and to align with 2021 Census Output Areas – see Appendix 1

****NB: 2021 Census Update** – Whilst population data as at 2021 is now available to OA level this is only as an overall number of people / five year age bands but is not broken down by single year of age and sex. The latest population data by single year of age from the 2021 Census is only available currently down to Lower Layer Super Output Area (“LLSOA”) and Middle Layer Super Output Area (“MLSOA”) levels which is not refined enough to construct Parish population level estimates by single year of age / sex (using best fit Output Areas). Therefore, the most recent Parish population estimates by single year of age (which is needed for the demographic modelling in this report at section 4.3) remains that provided by the Office for National Statistics (“ONS”) based on the Mid-2020 population estimates to Output Area (“OA”) level.

²⁴ See Appendix 1

²⁵ See Appendix 2

²⁶ See Appendix 2

Charts at Appendix 5 compare 2020 Population Estimate and 2021 Census outputs by 5 year age bands for Bentley Parish and the CSM FC – it can be seen that, whilst broadly similar, the 2020 population estimate at a Parish level tends to underestimate the number of older people and overestimate younger households compared to the 2021 Census, whilst across the wider CSM FC the profile is broadly similar. However, the data suggests that the decline in the working age population in the Parish is likely to be more significant than suggested by the mid-2020 population estimates.

Whilst data on the number of households is available at OA level based on the 2021 Census the increased household sizes, despite England continuing to have an ageing population, looks to reflect a continuing propensity for constrained household formation.²⁷ Projecting this trend forwards is undesirable when modelling local housing need as it will underestimate the full requirement for new homes.

A 2021 adjusted projection is undertaken as part of the demographic modelling to estimate potential impacts to housing requirements as a result of the 2021 Census data in the absence of detailed population data by sex and single year of age at an OA level for 2021 at the present time.

- 3.3.2 The 2021 Census population estimates for Babergh district suggest a population of 92,336 as at 2021²⁸ - this is 364 people lower than the 92,700 estimate based on the mid-2020 population estimate and suggests a c.5% increase since 2011. At a regional level the population across the East of England is suggested to have increased to 6,335,068 households at 2021 compared to 6,269,200 based on the mid-2020 population estimate – this is c.8% over that suggested as at 2011 and very similar to the 7% increase estimated as at mid-2020.
- 3.3.3 However, at a Parish level the 2021 Census data suggests a level of population growth between 2011 and 2021 which, at 6%, has been in excess of that seen at a district level, but below that at a regional level (at 5% to 8% respectively). This is encouraging in terms of Bentley seeing population growth to assist with retaining existing amenities and facilities and remaining a viable community.
- 3.3.4 However, Bentley sits within the wider Capel St Mary Functional Cluster (“CSM FC”) which is suggested to have had significantly lower population growth (at 3%) 2011 to 2021 than

²⁷ ‘Making sense(sus) of it, Lichfields, 28th June 2022

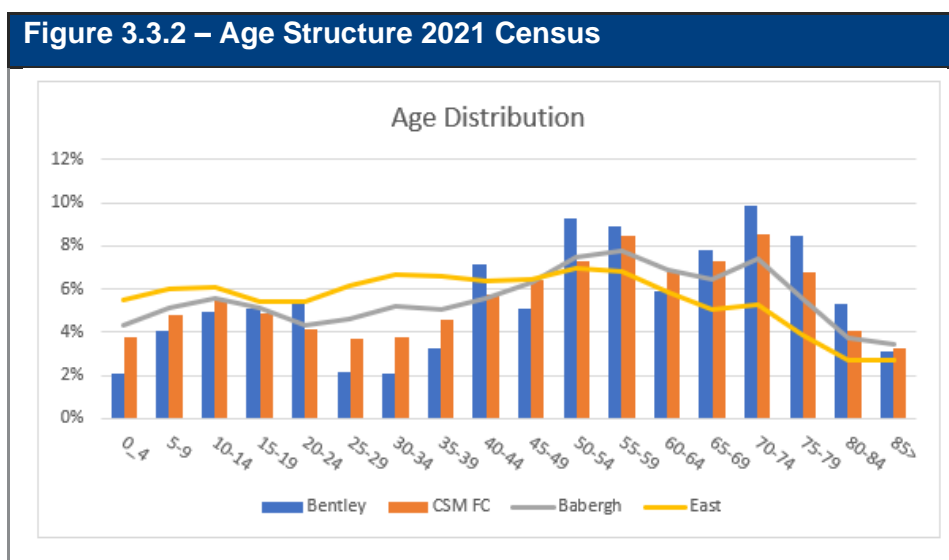
²⁸ Sex by single year of age (Lower Tier Local Authorities): TS009 - ONS

across Babergh district (at 5%). Furthermore, across the Rural Area as a whole (i.e. all of the settlements listed within Functional Clusters in Map 4 of the CS excluding the urban areas of Hadleigh, Sudbury and Great Cornard) population growth 2011 to 2021 has reached only 3% - significantly less than that seen across the district as a whole.

- 3.3.5 The RA equates to c.65% of the total population across Babergh district as a whole based on the 2021 Census which suggests a total of 92,336 people district wide. When viewed in this context it seems unrealistic to seek to restrict overall development across the RA to c.18% of the overall housing growth planned for the district as a whole (as per the approach in the CS). The data above suggests that population growth within the RA (at c.3%) has been more restricted than across the district as a whole (at 5%) and across the region (at 8%) and it is unlikely that the CS approach will address current and future housing needs in the RA.

Age Structure

- 3.3.6 The figure below shows the age structure as at the 2021 Census across Bentley Parish and the CSM FC compared to the wider Babergh district – this suggests smaller concentrations of younger working households (particularly among 25 to 39 years) in the Parish and CSM FC compared to older working and retirement age households (50 years +):



Source: 2021 Census (see Appendix 2 for the Bentley Parish / CSM FC Best Fit Output Areas used)
ONS Crown Copyright Reserved. Please also see note (**) under Figure 3.3.1 above

Household Types

- 3.3.7 The table below shows household types (in 2021) in Bentley Parish and the Capel St Mary Functional Cluster compared with the wider area. The analysis shows a higher than average proportion of couples aged over 66 and a lower proportion of single people under 66 in the Parish and the CSM FC than across the district, region or country. There is suggested to be less lone parents with dependent children than across the district, region or country.

Figure 3.3.3: Household Types (2021) – % of households

	Bentley Parish	CSM FC	Babergh	East (Region)	England
One person 66 and over	11.9%	15.4%	15.6%	13.2%	12.8%
Couple 66 and over	26.6%	19.7%	14.8%	10.4%	9.2%
One person (under 66)	8.5%	8.6%	12.7%	15.7%	17.3%
Couple (no children)	17.0%	19.4%	19.5%	17.2%	16.8%
Couple (dependent children)	16.4%	18.4%	17.9%	20.2%	18.9%
Couple (non-dependent children only)	9.3%	8.5%	7.0%	6.6%	6.3%
Lone parent (dependent children)	2.3%	3.4%	4.8%	6.3%	6.9%
Lone parent (non-dependent children only)	2.0%	2.8%	3.4%	3.9%	4.2%
Other households	5.9%	3.9%	4.2%	6.5%	7.7%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%
Total Households	353	2,822	40,200	2,628,778	23,436,086

Source: 2021 Census ONS Crown Copyright Reserved

Tenure

- 3.3.8 The table below shows household tenure compared across a number of locations. The analysis identifies a higher proportion of outright owner-occupiers within Bentley Parish and the CSM FC compared with the district, the region and nationally. The proportion of households living in the social rented sector is relatively low, whilst the proportion living in private rented accommodation is also notably lower than observed regionally and nationally. There is also suggested to be a lower level of Shared Ownership housing with only one single such household recorded in Bentley Parish in 2021 and only 37 such households across the whole of the CSM FC.

Figure 3.3.4 Tenure (2021) – % of households					
	Bentley	CSM FC	Babergh	East (Region)	England
Owns outright	55.4%	51.5%	43.4%	34.6%	32.5%
Owns with mortgage/loan	27.6%	31.4%	27.6%	30.6%	28.8%
Shared Ownership	0.3%	1.3%	0.7%	1.0%	1.0%
Social rented	6.0%	7.9%	13.3%	15.5%	17.1%
Private rented	10.8%	7.8%	14.8%	18.2%	20.5%
Lives Rent Free	0.0%	0.1%	0.2%	0.1%	0.1%
TOTAL	100%	100%	100%	100%	100%
Total Households	352	2,804	40,200	2,628,782	23,436,085

Source: 2021 Census ONS Crown Copyright Reserved

Housing Mix

- 3.3.9 The following 2021 Census data suggests that the single largest proportion of homes in Bentley Parish across all tenures has three bedrooms and that the proportion of owner occupier 4 bedroom or larger homes is broadly in line with that across the wider district. The proportion of 2 bedroom owner occupier homes in Bentley Parish is slightly lower than across the district, but the proportion of 3 bedroom homes is slightly greater. Overall the data suggests that the provision of a range of 2, 3 and 4+ bedroom open market homes in the Parish will reflect existing characteristics.
- 3.3.10 The proportion of 3 bedroom Social Rented homes in Bentley Parish is substantially bigger than across the wider CSM FC or the district, whilst the proportion of one bedroom homes in this tenure is considerably lower than across the district. The proportion of Social Rented 4+ bedroom homes is slightly higher than across the wider district and, whilst the proportion of 2 bedroom homes is slightly higher than the district, this is not the case in the Private Rented Sector (which can often be occupied by households in receipt of Housing Benefit). Taken together these points suggest that, subject to site specific design considerations and alignment with local characteristics, the provision of additional 1 to 2 bedroom rented Affordable Housing in particular would assist with balancing the options for rented housing at affordable prices in the Parish.

Figure 3.3.5 No. of Bedrooms by Tenure - % of Households					
Owner Occupier (inc. Shared Ownership)					
	Bentley	CSM FC	Babergh	East (Region)	England
1 bedroom	1%	1%	2%	4%	4%
2 bedrooms	13%	13%	19%	20%	21%
3 bedrooms	51%	41%	43%	44%	46%
4 or more bedrooms	35%	46%	36%	32%	29%
TOTAL	100%	100%	100%	100%	100%
Total Households	293	2,380	28,848	1,740,803	14,605,016
Social Rent - No. Beds					
	Bentley	CSM FC	Babergh	East (Region)	England
1 bedroom	5%	14%	21%	29%	29%
2 bedrooms	40%	49%	41%	35%	36%
3 bedrooms	50%	34%	34%	32%	31%
4 or more bedrooms	5%	3%	4%	4%	4%
TOTAL	100%	100%	100%	100%	100%
Total Households	20	224	5,337	407,152	4,005,663
Private Rent/ Rent Free					
	Bentley	CSM FC	Babergh	East (Region)	England
1 bedroom	5%	9%	15%	21%	21%
2 bedrooms	25%	36%	37%	38%	39%
3 bedrooms	58%	41%	37%	30%	29%
4 or more bedrooms	13%	14%	11%	11%	11%
TOTAL	100%	100%	100%	100%	100%
Total Households	40	231	6,021	480,829	4,825,408

Source: 2021 Census ONS Crown Copyright Reserved

Accommodation Type

3.3.11 The proportion of detached homes in Bentley Parish and the CSM FC is higher than across the wider district, regional and national averages, with lower proportions of flats semi-detached and terraced housing types.

Figure 3.3.6 Accommodation Type (2021) – % of households

	Bentley	CSM FC	Babergh	East (Region)	England
Detached	64.1%	62.5%	41.7%	29.6%	22.9%
Semi-detached	21.8%	26.3%	30.1%	31.0%	31.5%
Terraced	14.1%	9.3%	20.6%	21.2%	23.0%
In a purpose-built block of flats or tenement	0.0%	1.3%	5.4%	14.5%	17.1%
Part of a converted or shared house, including bedsits	0.0%	0.2%	0.6%	1.7%	3.5%
A caravan or other mobile or temporary structure	0.0%	0.1%	0.3%	0.6%	0.4%
Other	0.0%	0.4%	1.2%	1.3%	1.6%
TOTAL	100%	100%	100%	100%	100%
Total Households	348	2,807	40,200	2,628,782	23,436,085

Source: 2021 Census ONS Crown Copyright Reserved

Affordability

3.3.12 In terms of affordability HPSSA Dataset 37 (published by the ONS²⁹) suggests a median house price of £433,325 at a Ward level (Copdock and Washbrook³⁰) as at September 2022 (the latest comparable date) although this has increased to £440,000 as at December 2022. This can be compared to £330,000 across the district as at September 2022.³¹ ONS data suggests a district wide median gross annual income of £26,099 and ratio of 12.64 as at September 2022.³² Using the same income against the Ward level house price of £433,325,000 suggests an affordability ratio of 16.6.

²⁹ Office for National Statistics

³⁰ As at 2022

³¹ Based on ONS data in the 'Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2022 (Table 5a).

³² Tables 5b and 5c, Ratio of median house price to median gross annual workplace-based earnings, ONS

3.4 Summary

- 3.4.1 Bentley is described as a 'Hinterland Village' within the adopted Babergh CS Policy CS2 and lies wholly within the Capel St Mary 'Functional Cluster' set out within Map 4 in the CS and is situated within the Parish of the same name (i.e. Bentley).
- 3.4.2 Having regard to the reasoning with the East Bergholt Judgment a three tier study area is defined for the purposes of this report, although the primary focus should on the CSM FC study area in line with the reasoning within the East Bergholt Judgment:
- Rural Area ("RA")
 - Bentley Parish
 - Capel St Mary Functional Clusters ("CSM FC")
- 3.4.3 Analysis of local characteristics based on 2021 Census data in the Bentley Parish and Capel St. Mary Functional Cluster suggests a relatively high proportion of couples aged over 66 in the Parish and the CSM FC than across the district, region or country, although there are lower proportions of single people under 66 and lone parents with dependent children. There are suggested to be smaller concentrations of younger working households (particularly among 25 to 39 years) in the Parish and CSM FC compared to older working and retirement age households (50 years +).
- 3.4.4 Despite Owner Occupation being the predominant tenure, 2021 Census data suggests a very low level of Affordable Home Ownership housing with only one single Shared Ownership household recorded in Bentley Parish in 2021 and only 37 such households across the whole of the CSM FC.
- 3.4.5 There are a range of dwelling sizes in the Parish and CSM FC, although the proportion of 2 bedroom owner occupier homes in Bentley Parish is slightly lower than across the district, whilst the proportion of 3 bedroom homes is slightly greater. The proportion of 3 bedroom Social Rented homes in Bentley Parish is substantially bigger than across the district, whilst the proportion of one bedroom homes in this tenure is considerably lower. The Parish and the CSM FC is characterised by a higher proportion of detached homes than across the district.

4 HOUSING NEED

4.1 Overview

- 4.1.1 The housing requirement figure within the CS is acknowledged by the Council to be out of date for the purposes of understanding the five year housing land supply in the district. The Standard Method outlined in the NPPF and explained in detail in the NPPG is the appropriate measure of housing requirements against which planned supply should be considered.
- 4.1.2 The Ipswich and Waveney Strategic Housing Market Assessment (“SHMA17”) undertaken by Peter Brett Associates (PBA) on behalf of local authorities within the Housing Market Area (“HMA”) was published in May 2017. An update Part 2 SHMA (“SHMAU”) published in January 2019, whilst drawing on 2011 Census outputs (many of which have since been updated through the 2021 Census) for some conclusions, considers the implications of the Standard Method introduced by the Government - which remains the process set out in the NPPG – for the assessment of overall housing need.
- 4.1.3 The SHMAU sets out a local housing need for 428 homes in Babergh based on the Standard Method and the 2014-based household projections published by the Government (which continue to remain a required input in the NPPG) and a 455 requirement based on the 2016 household projections. As noted at Section 2.2 above an updated Standard Method calculation within the HLPS published in December 2022 suggests a LHN of 417 dwellings per annum (i.e. prior to a 5% buffer being applied).³³ However, the Standard Method only provides outcomes at a local authority level and there is no guidance in either the NPPF or NPPG on how this can be applied at a sub-area level.
- 4.1.4 Whilst paragraph 66 of the NPPF refers to local authorities identifying a housing requirement for Neighbourhood Plan Areas which ‘reflects the overall strategy for the pattern and scale of development’, all such strategies will need to be underpinned by the NPPF requirement to accord with the presumption in favour of sustainable development, which requires not only objectively assessed housing needs within an area to be met (at minimum), but also for unmet needs in neighbouring areas to be met as well. The NPPF emphasis is on significantly boosting housing supply and providing sufficient housing to meet communities housing needs.

³³ Page 5, Table 2.2, HLPS

- 4.1.5 Unfortunately, sub-local authority level assessment is not undertaken within any of the SHMA17 documents or subsequent SHMAU and the Neighbourhood Plan Area housing figures originally proposed within the emerging JLP do not reflect an objective assessment of housing need for those areas and remain subject to change as and when Part 2 of the Local Plan is prepared. Unless sufficient provision is made to meet local requirements housing need as a result of undersupply within communities will simply have to be met elsewhere even though this results in displaced households, weakened community ties and spiralling housing costs as a result of unaddressed housing demand / supply pressures.
- 4.1.6 Whilst housing needs analysis has been undertaken as part of the NHP process the 2020 Bentley Housing Needs Assessment (“HNA”) by AECOM draws on settlement hierarchy / development distribution approaches set out within emerging Plan policy which, as a result of outcomes from the ongoing examination process since the HNS was prepared, will now not be settled until Part 2 of the emerging Local Plan is progressed through the examination process. It also draws on 2011 Census data for overall population / dwelling data which has since been updated through the 2021 Census. As such, its conclusions on housing and Affordable Housing reflect older data sources than are now available and relies on emerging policy approaches to housing distribution that are not adopted and potentially subject to change through the preparation of Part 2 of the Local Plan.
- 4.1.7 Adopted Development Plan policy does not include sub-area level policies which were based on an assessment of this sub-area level objective housing need prior to determining an approach to housing distribution. At a sub-area level a reasonable approach under the circumstances is to assume that housing need will arise within a sub-area at a rate per household that is broadly proportionate per head of population with that across the district as a whole. This approach is applied in respect of the study areas defined in Section 3.2 above to provide an estimate of housing need, along with additional demographic modelling undertaken specifically for Bentley Parish and the CSM FC study areas.
- 4.1.8 The Core Strategy envisaged a site allocations development plan document coming forward to allocate that minimum level of growth across the rural area. A site allocations plan was not forthcoming. However, the Core Strategy provides flexibility for development beyond existing settlement boundaries in the core and hinterland villages. The capacity of those settlements will be guided by many factors, including the ability of existing services, facilities and infrastructure to accommodate development, or the development’s ability to enhance them. The Core Strategy housing requirement (and therefore the minimum requirement

across the core and hinterland villages) is recognised by Babergh District Council as being out of date.

- 4.1.9 This report, therefore, undertakes two approaches to the assessment of overall local housing need (i.e. across all tenures); the first 'Standard Method Aligned' approach assumes that this new need will arise within a sub-area at a rate per person that is broadly proportionate with that suggested by the Standard Method across the district as a whole (as reported by the December 2022 HLPS). This top down 'proportionate' approach is applied in respect of Bentley Parish, the RA the CSM FC to provide an up to date estimate of overall housing need.
- 4.1.10 The second approach to assess overall housing need uses demographic modelling to provide a series of projections developed based on the most up-to-date information available from both Office for National Statistics ("ONS") and the Department for Levelling Up, Housing, and Communities ("DLUHC") and calibrated by up-to-date sub-area information in terms of small area mid-year population estimates by single year of age and sex, district level 2021 Census population data and 2011 Census data in terms of vacancy levels (with this latter information yet to be updated at an OA level based on 2021 Census data). This 'bottom up' approach has regard to the local population profile in terms of age and sex to provide projections of local housing need.
- 4.1.11 A top-down approach is then applied to estimate the level of Affordable Housing need in the Study Areas based on the Council's district level assessment, as the Parish level assessment of Affordable Housing need provided within the AECOM 2020 Housing Needs Assessment is, as noted above, predicated on emerging plan settlement hierarchy / development distribution approaches, and these will now not be settled until Part 2 of the emerging Local Plan is progressed through the examination process and so should not be applied to determine sub-area level housing distribution.

4.2 Standard Method Aligned Local Housing Need

Overall Housing Need

- 4.2.1 To be consistent with the approach taken within the Council's HLPS³⁴ when assessing the five year housing land supply, a 417 per annum minimum local housing need ("LHN") figure (based on the Council's updated Standard Method outcome) is applied at a sub-local authority area level in conjunction with the assumption that housing need arises at a rate per person proportionate to that across the district as a whole.
- 4.2.2 This is applied as a rate per person for the Study Areas during the 2023 - 2037 remaining emerging plan period (given that the current Plan period has elapsed) as follows:

Figure 4.2.1 – Overall Housing Need 2023 - 2037

Area	Total Population	Minimum Local Housing Need ("LHN") 2023 - 2037	Rate of LHN per Person
Babergh district	92,336	5,838	0.0632256
Bentley Parish	826	52	0.0632256
CSM FC	6,554	414	0.0632256
RA	60,023	3,795	0.0632256

Source: Population Estimates as annotated at Figure 3.3.1 and based on the Standard Method Local Housing Need within the December 2022 HLPS

During the remaining emerging Plan period (2023 – 2037) this suggests a minimum LHN for:

- 3,795 homes (271 per annum) across the RA (i.e. outside urban areas and market towns)
- 414 homes (30 per annum) across the CSM FC
- 52 homes (4 per annum) across Bentley Parish

³⁴ Page 9, HLPS

4.3 Study Area Demographic Modelling

- 4.3.1 When focussing in on the CSM FC and Bentley Parish the modelling can be taken a step further than a simplistic top down rate of housing need per household using the Standard Method output at a local authority level. This is useful as it will reflect differences in population distribution in terms of age and sex at a sub-area level compared to across the wider district, providing a finer grained assessment for the Functional Cluster and Parish level analysis.
- 4.3.2 To build on the modelling already undertaken a series of demographic projections have been undertaken by Pioneer to help consider housing needs in the CSM FC and in Bentley Parish. Pioneer has modelled a scenario taking the 2014-based household projections as the starting point and assessing a 10 year period – 2023 to 2033 - in line with the Standard Method timeframe as currently set out in the NPPG. A further set of projections has been added using the 2018-based household projections as the starting point, and assessing a 10 year period – 2023 to 2033.
- 4.3.3 The projections developed are based on the most up-to-date information available from both Office for National Statistics (“ONS”) and the Department for Levelling Up, Housing, and Communities (“DLUHC”) and calibrated by up-to-date sub-area information in terms of small area mid-year population estimates, district level 2021 Census population data (as yet unavailable by single year of age / sex at a small area level) and 2011 Census data in terms of vacancy levels.³⁵
- 4.3.4 The purpose of this section is to provide an additional up to date demographic approach to projecting the likely required level of housing and based on this, affordable housing need in the CSM FC and Bentley Parish.

Methodology

- 4.3.5 The methodology to look at smaller-area projections has involved setting up a model for the district and then using a sub-model for the CSM FC and Bentley Parish. Within the modelling it is broadly assumed that a proportional increase in population in any age/sex category across the district will also occur at a smaller area level.

³⁵ A 2021 Census version of the 2011 Census KS401EW - Dwellings, household spaces and accommodation type – is as yet unavailable either as a ready-made table, a topic table or a custom table at OA level

4.3.6 Essentially the methodology works by looking at incremental changes in each age and sex band (for each year of each projection) and applies this to the local population. For example, if a particular age/sex group is projected to increase by 10% local authority-wide then the methodology will assume a similar level of population growth for that particular age/sex group at a smaller area level.

4.3.7 The methodology used to assign the population change figures to smaller areas is therefore based on overall change at a local authority-wide level (by age and sex) being applied to the demographic profile of the local population. This methodology takes account of past trends in fertility, mortality and migration to the extent that these will have shaped the current population profile (with such trends likely to shape the future population). Some of the key data sources are summarised below:

- 2014-based DLUHC household projections – provides baseline data at district level
- 2018-based ONS household projections – provides baseline data at district level
- ONS mid-year population estimates (MYE) – provides an up-to-date view (to 2020 down to OA/LSOA³⁶ level) on the age/sex profile of the local population.
- 2021 Census – this data provides a range of information including about population, household spaces and vacancy rates

4.3.8 The projections can be summarised as follows:

a) PROJECTION 1a – DLUHC 2014-based household projections (“PROJ 1a”)

This baseline demographic projection reflects the level of household growth reported in the DLUHC 2014-based household projections (which is the same starting point as the Standard Method prior to any uplift) which is then converted into housing numbers through the application of a vacancy rate based on Census data.³⁷

³⁶ Output Areas are applied as a best fit to the CSM FC and Bentley Parish Study Areas – see Section 3.3 of this report. 2021 Census data is currently unavailable by single year of age / sex at an OA / Parish level, and is only available as an overall usually resident population total. Whilst the 2021 Census overall population data suggests 117 less people across the CSM FC and 21 more across Bentley Parish than the mid-2020 population estimates this will not necessarily mean that the proportionate profile (i.e. proportion of people in each age cohort) is significantly different to that estimated in the mid-2020 Parish level population data. Until the 2021 Census data is made available at a Parish level (or OA level) by single year of age / sex then the mid-2020 based population data remains the most recent information available.

³⁷ 2011 Census Table KS401EW – 2021 data on dwellings and occupancy is not yet available to OA levels

b) PROJECTION 1b – ONS 2018-based household projections (“PROJ 1b”)

This baseline demographic projection reflects the level of household growth reported in the ONS 2018-based household projections which is then converted into housing numbers through the application of a vacancy rate based on Census data.

c) PROJECTION 1c – ONS 2018-based household projections 2021 Census Adjusted (“PROJ 1c”)

This baseline demographic projection reflects the level of household growth reported in the ONS 2018-based household projections, but includes adjustments to reflect the proportionate population changes by single year of age so far reported at a district level through the 2021 Census,³⁸ which is then converted into housing numbers through the application of a vacancy rate based on Census data.

d) PROJECTION 2 – ONS 2018-based household projections High Migration (“PROJ 2”)

This high migration demographic projection reflects the level of household growth reported in the ONS 2018-based high migration household projections which is then converted into housing numbers through the application of a vacancy rate based on Census data.

e) PROJECTION 3 – ONS 2018-based household projections Low Migration (“PROJ 3”)

This low migration demographic projection reflects the level of household growth reported in the ONS 2018-based low migration household projections which is then converted into housing numbers through the application of a vacancy rate based on 2011 Census data.

³⁸ This data is also reported to MSOA level, but this is not a small enough area geographically to enable a best fit to OAs / Parishes. Hence the District data is used in the absence of OA level data.

4.3.9 The following table provides the sub-area level outputs:

Figure 4.3.1: Summary of Overall Housing Projections 2023 to 2033

Projection	Household growth			
	Bentley Parish		CSM FC	
	No.	% change	No.	% change
PROJ 1a - DLUCH 2014-based household projections	24	6.13%	230	7.36%
PROJ 1b - ONS 2018-based household projections	28	7.03%	264	8.44%
PROJ 1c - ONS 2018-based household projections (2021 Census)	29	7.44%	275	8.72%
PROJ 2 - ONS 2018-based household projections (High Migration)	30	7.62%	285	9.10%
PROJ 3 - ONS 2018-based household projections (Low Migration)	25	6.36%	240	7.69%

Source: Pioneer Analysis July 2023

4.3.10 The above projections are prior to any adjustment factor having been applied to reflect affordability pressures based on workplace based median incomes and house prices (i.e. in line with the Standard Method). The Standard Method formula applied using the Standard Method calculation within the December 2022 HLPS³⁹ suggests an adjustment factor of '1.49' (or c.49%) for Babergh. However, as noted at Section 3.3 paragraph 3.3.12, affordability in the environs of the application site is likely to be worse than at a district wide level due to higher house prices.

4.3.11 When calculating local housing need figures the NPPG advises the application of a cap to any uplifts (the approach to which depends upon the age of the plan) to ensure that the minimum local housing need figure is 'as deliverable as possible'.⁴⁰ However, the purpose of this report is to assess the need for housing at a sub-area level. The NPPG does not refer to sub-area housing need assessments being subject to caps, although delivery will obviously be limited by the availability of land. As such, it is appropriate to understand the full likely extent of housing need when establishing the need for additional housing.

³⁹ Appendix 1, DecHLPS

⁴⁰ Paragraph: 007 Reference ID: 2a-007-20190220, NPPG

4.3.12 When the district affordability adjustment factor (which reflects the unadjusted baseline household projections applied using the Standard Method) is applied to PROJ 1a, PROJ1b and PROJ 1c this suggests:

Bentley Parish

NB: All outputs subject to rounding

- PROJ 1a plus affordability adjustment factor - a growth of c.36 households over 10 years (or c.4 households per annum) within Bentley Parish. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.37⁴¹ homes over 10 years** (or **c.4 homes per annum** or c.52 over the remaining 14 years 2023 – 2037 of the NHP).
- PROJ 1b plus affordability adjustment factor - a growth of c.41 households over 10 years (or c.4 households per annum) within Bentley Parish. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.43⁴² homes over 10 years** (or **c.4 households per annum** or c.60 over the remaining 14 years 2023 – 2037 of the NHP).
- PROJ 1c plus affordability adjustment factor - a growth of c.44 households over 10 years (or c.4 households per annum) within Bentley Parish. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.45⁴³ homes over 10 years** (or **c.5 homes per annum** or c.64 over the remaining 14 years 2023 – 2037 of the NHP).

CSM FC

NB: All outputs subject to rounding

- PROJ 1a plus affordability adjustment factor - a growth of c.342 households over 10 years (or c.34 households per annum) within CSM FC. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.352⁴⁴ homes over 10 years** (or **c.35 homes per annum** or c.492 over the remaining 14 years 2023 – 2037 of the emerging Local Plan).

⁴¹ 2011 Census Table KS401EW

⁴² 2011 Census Table KS401EW

⁴³ 2011 Census Table KS401EW

⁴⁴ 2011 Census Table KS401EW

- PROJ 1b plus affordability adjustment factor - a growth of c.393 households over 10 years (or c.39 households per annum) within CSM FC. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.404⁴⁵ homes over 10 years** (or **c.40 households per annum** or c.565 over the remaining 14 years 2023 – 2037 of the emerging Local Plan).
- PROJ 1c plus affordability adjustment factor - a growth of c.410 households over 10 years (or c.41 households per annum) within CSM FC. This does not reflect a vacancy rate to convert the household growth into dwellings which would take the total up to **c.421⁴⁶ homes over 10 years** (or **c.42 homes per annum** or c.589 over the remaining 14 years 2023 – 2037 of the emerging Local Plan).

The above reflects the 2014-SNPP based DLUCH baseline projection PROJ1a, the 2018 SNPP based ONS baseline PROJ1b and the 2018 SNPP based ONS 2021 Census Population adjusted PROJ1c, but adjustments for increased migration would see an increased overall housing requirement.

4.4 Affordable Housing Need

- 4.4.1 Adopted CS Policy CS19 'affordable housing' seeks 35% affordable housing from all residential development in the district, with tenure and mix reflecting established need in the district.
- 4.4.2 The SHMAU published in January 2019, and which assesses the 2018 to 2036 period, remains the most recent assessment of Affordable Housing need in the district, albeit it draws on 2011 Census material that has since been updated through the 2021 Census. The SHMAU indicates the following need for affordable housing across the district:

⁴⁵ 2011 Census Table KS401EW

⁴⁶ 2011 Census Table KS401EW

Figure 4.4.1 – District Wide Affordable Housing Need

Affordable Housing Tenure	Total Households 2018 - 2036	Implied Total Households per annum
Rented Affordable Housing	984	55
Shared Ownership Housing	506	28
Discounted Sale Housing	495	28
TOTAL	1985	110

Source: Based on SHMAU pages 28 and 29

- 4.4.3 There is no assessment of affordable housing need at a sub-area level within the SHMAU. The assessment of Affordable Housing need within the NHP HNA concludes a need for c.18 affordable homes over 18 years – 1 per annum. This would equate to a need for 14 affordable homes 2023 to 2037. The HNA draws on 2011 Census data which has since been updated through the 2021 Census and emerging Plan approaches to housing distribution which it then applies to pro-rata the Affordable Housing need set out within the SHMAU. However, emerging policy housing distribution approaches are not adopted and are subject to change through the preparation of Part 2 of the Local Plan and should not be applied to the calculation of Affordable Housing need, particularly as the distribution of Affordable Housing need may not align with the distribution of need for market housing.
- 4.4.4 On the basis that Affordable Housing need is suggested to arise across Bentley Parish and CSM FC at a rate proportionate to that across the wider district the following number of affordable homes are required during the 14 year 2023 to 2037 period:

Figure 4.4.2 – Implied CW Parish Affordable Housing Need 2023 - 2037

Area		2021 Census Total Population*	Affordable Housing Need 2023 - 2037	Rate of Affordable Housing Need per Person
Babergh district	Rented Affordable Housing	92,336	765	0.008289
	Shared Ownership Housing		394	0.004262
	Discounted Sale Housing		385	0.004170
	TOTAL Affordable Housing Need		1544	0.016720
Bentley Parish*	Rented Affordable Housing	826	7	0.008289
	Shared Ownership Housing		4	0.004262
	Discounted Sale Housing		3	0.004170
	TOTAL Affordable Housing Need		14	0.016720
CSM FC*	Rented Affordable Housing	6,554	54	0.008289
	Shared Ownership Housing		28	0.004262
	Discounted Sale Housing		27	0.004170
	TOTAL Affordable Housing Need		110	0.016720
RA*	Rented Affordable Housing	60,023	498	0.008289
	Shared Ownership Housing		256	0.004262
	Discounted Sale Housing		250	0.004170
	TOTAL Affordable Housing Need		1004	0.016720

Source: 2021 Census data: Sex by single year of age (Lower Tier Local Authorities): TS009 and TS001 - Number of usual residents (persons) in households and communal establishments, ONS Crown Copyright Reserved and SHMAU pages 28 and 29 *based on 2021 Census Output Areas – see Appendices 1 and 2

This suggests a need for 14 affordable homes across Bentley Parish (which aligns with the NHP HNA), 110 affordable homes across CSM FC and 1,004 affordable homes across the wider RA between 2023 and 2037. However, these pro-rata assessments will not reflect differences in population distribution in terms of age and sex at a sub-area level compared to across the wider district.

Demographic Modelling - Affordable Housing Need

- 4.4.5 Based on the district wide need assessed within the SHMAU and its predecessors, adopted and emerging Plan policy seek to secure 35% affordable housing. Where adopted policy is applied within the context of the NPPF affordable housing will be sought on sites of 10 or more dwellings / 0.5 hectares or more subject to viability.
- 4.4.6 There is no assessment of affordable housing need at a sub-area level within the SHMAU / HNA that reflects differences in population distribution in terms of age and sex at a sub-area level. However, the policy decision has been taken by the Council that 35% of housing overall across all Functional Cluster sub-areas in the district needs to be provided as affordable housing to assist with addressing the requirements for this type of housing and this can therefore be applied to the sub-area level demographic modelling outputs set out in Section 4.3 above (which do reflect differences in population distribution in terms of age and sex at a sub-area level).
- 4.4.7 Based on 35% Affordable Housing (in line with the level suggested to be needed within settled and emerging local Development Plan policy) being applied:
- I. to the Bentley Parish projected 37 to 45 overall ten year local housing need c.13 to 16 affordable homes would need to be provided (or 18 to 22 over the remaining 14 years 2023 – 2037 of the NHP), and,
 - II. to the CSM FC projected 352 to 421 overall ten year local housing need c.123 to 147 affordable homes would need to be provided (or 172 to 206 over the remaining 14 years 2023 – 2037 of the emerging Local Plan).

This suggests a greater level of need than the SHMAU based pro-rata assessment; something which highly likely to be the case given that data referred to in Section 3.3 above suggests that affordability pressures in Bentley are likely to be significantly greater than across the district as a whole on average.

4.5 Housing Tenure and Mix

Babergh District - Tenure

- 4.5.1 As adopted Policy CS19 'affordable housing' seeks 35% affordable housing this results in a 35% Affordable Housing / 65% market housing tenure split across the district.
- 4.5.2 Specifically for Affordable Housing, Table 4.3c of the SHMAU suggests a tenure split for the 2018 – 2036 period across the district of 10% Shared Ownership and 90% Affordable Rent / Social Rent. However, this split does not reflect the current NPPF Affordable Housing definition which includes 'households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration' as needing Affordable Housing.⁴⁷
- 4.5.3 This issue can be addressed by reference to SHMAU Tables 4.6c, 4.7c and 4.8c⁴⁸ which reflect that a proportion of households in the Private Rented Sector are eligible for / in need of Affordable Home Ownership. These SHMAU outputs are summarised in Figure 4.4.1 above and suggest the following NPPF definition aligned Affordable Housing tenure split requirement 2018 – 2036:

Figure 4.5.1 - Affordable Housing Tenure Split 2018 - 2036	
Rented Affordable Housing	50%
Shared Ownership Housing	25%
Discounted Sale Housing	25%
TOTAL	100%

Source: Tables 4.6c, 4.7c and 4.8c, SHMAU

Bentley Parish - Tenure

- 4.5.4 As noted above CS Policy does not set Parish level Affordable Housing proportions, but applies a 35% Affordable Housing target across the whole district.
- 4.5.5 The NHP does not include tenure split targets within Policy wording. Given the overarching approach within Policy CS19 Affordable Housing tenure split proposals should reflect the established need in the district.

⁴⁷ Housing Needs of Different Groups, Paragraph 006, NPPG

⁴⁸ Pages 28 and 29, SHMAU

- 4.5.6 The SHMAU, as noted at Section 4.1 above, does not assess Affordable Housing need at a sub-local authority area level, but in line with adopted Policy a 50% rented / 50% sale Affordable Housing tenure split would be appropriate based on the established district wide need in Tables 4.6c, 4.7c and 4.8c of the SHMAU and the current NPPF Affordable Housing definition.
- 4.5.7 Notwithstanding the concerns around the NHP HNA reliance on old data sources and housing distribution approaches that are not adopted and subject to change through the preparation of Part 2 of the Local Plan, it is noted that the HNA concludes a 50% Affordable Home Ownership and 50% rented Affordable Housing (25% Social Rent and 25% Affordable Rent) tenure split in the Parish.⁴⁹ This broadly aligns with the district wide NPPF Affordable Housing definition compliant tenure split suggested based on Tables 4.6c, 4.7c and 4.8c of the SHMAU.

Babergh District – Housing Mix

- 4.5.8 Adopted policy does not specify housing mix targets for any tenure but proposals should reflect the established district need. The SHMAU conclusions on housing mix are summarised in Tables 4.4c to 4.8c, but should be applied with caution given that household occupancy profiles will be based on 2011 Census data which has since been updated through the 2021 Census. Furthermore, it is unclear from Appendix 4 of the SHMAU how the overall housing need projections are applied to conclude the different tenure size mix outputs.
- 4.5.9 Using a 2021 Census custom built table⁵⁰ and the 2014-SNPP based Household Projections (in line with the NPPG overall housing need standard method) it is possible to project at a district level the sizes of homes that owner occupier households (including Affordable Home Ownership) and households in rented Affordable Housing are likely to require if they continue to occupy homes as they have previously within each age cohort. This provides a baseline output on the additional % of dwellings required by dwelling size by 2033 (over a 10 year period based on the change needed) as follows:

⁴⁹ Table 5-5, NHP HNA

⁵⁰ Lower tier local authorities, Tenure of household (7 categories), Number of Bedrooms (5 categories) and Age (extended) (17 categories)

Figure 4.5.2 –

2014-SNPP based household Based Projected Housing Mix – 2023 - 2033

	Owner Occupier (including Affordable Home Ownership)	Rented Affordable Housing
1 bedroom	4%	49%
2 bedrooms	29%	42%
3 bedrooms	45%	8%
4 bedrooms+	22%	1%

Source: 2021 Census, DLUCH 2014-SNPP based Household Projections, ONS Crown Copyright Reserved
Pioneer Analysis July 2023

- 4.5.10 If the 2018-SNPP based Household Projections are used in conjunction with 2021 Census data (in terms of both population profiles by age and sex and occupancy profiles at 2021) are used in the modelling the following mix requirements 2023 to 2033 are suggested:

Figure 4.5.3 –

2018-SNPP based household Based Projected Housing Mix – 2023 - 2033

	Owner Occupier (including Affordable Home Ownership)	Rented Affordable Housing
1 bedroom	3%	38%
2 bedrooms	26%	42%
3 bedrooms	44%	18%
4 bedrooms+	26%	2%

Source: 2021 Census, DLUCH 2018-SNPP based Household Projections, ONS Crown Copyright Reserved,
Pioneer Analysis July 2023

Affordable housing Waiting List data provided within the Local Authority Housing Statistics (“LAHS”) data return for 2021-22 (the latest published data) suggests the following backlog (i.e. current) need for Affordable Housing:

**Figure 4.5.4 –
Babergh Affordable Housing Waiting List**

	Count	%
1 bedroom	392	50%
2 bedrooms	233	30%
3 bedrooms	136	17%
4 bedrooms+	25	3%

Source: LAHS 2021-22, DLUCH

Bentley Parish – Housing Mix

- 4.5.11 The NHP does not include tenure split targets within Policy wording, but places an emphasis on the (non-tenure specific) provision of two bedroom homes and supports the provision of bungalows.
- 4.5.12 The NHP HNA concludes most of the housing need to be for two bedroom homes, but does not include tenure specific housing mix conclusions and, as with the SHMAU, draws on 2011 Census data to inform its 'life-stage modelling' conclusions.
- 4.5.13 Based on 2021 Census data (see section 3.3 above) the provision of a range of 2, 3 and 4+ bedroom open market homes in the Parish will reflect existing characteristics although the focus would need to be on 3 and 4+ bedroom homes.
- 4.5.14 For Affordable Housing, subject to site specific design considerations, the provision of additional 1 and 2 bedroom rented Affordable Housing would assist with balancing the existing housing stock in the Parish, although a proportion of 3 bedroom homes (and a small proportion of 4 bedroom homes) is also appropriate to reflect existing local characteristics. Affordable Housing for Sale is generally best to be provided with 2 or 3 bedrooms reflective of purchaser aspirations and affordability thresholds.
- 4.5.15 Given the overarching approach within Policy CS19, Affordable Housing mix proposals should reflect the established need in the district such as that assessed based on updated Census and population data above.

Housing Mix Summary

4.5.16 Projected housing mix requirements at a district level (using 2021 Census data in conjunction with both 2014-SNPP based and 2018-SNPP based household projections) can be considered alongside the existing housing mix in Bentley Parish to assist with informing an appropriate housing mix for the application site:

Figure 4.5.5

Rented Affordable Housing Mix Analysis Overview

	Babergh District			Bentley Parish - Existing Social Rent Mix - 2021 Census
	2014-SNPP based household Projected Affordable Housing Mix 2023 - 2033	2018-SNPP based household Projected Affordable Housing Mix 2023 - 2034	LAHS Affordable Housing Waiting List 2021/22	
1 bedroom	49%	38%	50%	5%
2 bedrooms	42%	42%	30%	40%
3 bedrooms	8%	18%	17%	50%
4+ bedrooms	1%	2%	3%	5%
TOTAL	100%	100%	100%	100%

Market / Affordable Home Ownership Housing Mix Analysis Overview

	Babergh District		Bentley Parish - Existing Owner Occupier Mix - 2021 Census
	2014-SNPP based household Projected Owner Occupier Housing Mix 2023 - 2033	2018-SNPP based household Projected Owner Occupier Housing Mix 2023 - 2034	
1 bedroom	4%	3.1%	1%
2 bedrooms	29%	26.2%	13%
3 bedrooms	45%	44.4%	51%
4+ bedrooms	22%	26.3%	35%
TOTAL	100%	100%	100%

Source: Pioneer Analysis July 2023

4.6 Summary

- 4.6.1 Whilst paragraph 66 of the NPPF refers to local authorities identifying a housing requirement for Neighbourhood Plan Areas which ‘reflects the overall strategy for the pattern and scale of development’, all such strategies will need to be underpinned by the NPPF requirement to accord with the presumption in favour of sustainable development, which requires not only objectively assessed housing needs within an area to be met (at minimum), but also for unmet needs in neighbouring areas to be met as well. The NPPF emphasis remains on significantly boosting housing supply and providing sufficient housing to meet communities housing needs.
- 4.6.2 The housing requirement figure within the CS is acknowledged by the Council to be out of date for the purposes of understanding housing land supply in the district. The Standard Method outlined in the NPPF and explained in detail in the NPPG is an appropriate measure of housing requirements against which planned supply should be considered.
- 4.6.3 The emerging JLP remains in development and carries limited weight; the basis of JLP proposed distribution of housing across the district is also unclear in terms of how it relates to the levels of housing need likely to arise in the areas defined and is the subject of additional work as Part 2 of the Local Plan.
- 4.6.4 Whilst housing needs analysis has been undertaken in the 2020 Bentley Housing Needs Assessment (“HNA”), this provides conclusions on housing and Affordable Housing need that reflect older data sources than are now available (i.e. 2011 as opposed to 2021 Census data) and relies on emerging policy approaches to housing distribution that are not adopted and subject to change through the preparation of Part 2 of the Local Plan.
- 4.6.5 Given its role as a Hinterland Village Bentley is likely to be subject to housing requirement pressures arising not only from within the Parish, but also from the Functional Cluster within which it lies (i.e. Capel St Mary).
- 4.6.6 These housing requirement pressures will apply to both market and affordable housing and where insufficient new provision is made affordability in the Parish and the areas that lie within the relevant functional cluster and across the wider Core Village / Hinterland Villages will progressively worsen.
- 4.6.7 Taking these policy and locational factors together (and given the lack of an up to date housing needs based approach to housing distribution across the rural parts of the district

and the continuing lack of clarity on how sub-area housing needs should be assessed) when seeking to understand how the application proposals will assist with addressing housing need it is appropriate to consider the need for housing across the Core Villages and Hinterland Villages and Villages within the Functional Clusters listed within the adopted CS (i.e. the 'Rural Area' – "RA") as a whole.

4.6.8 Bearing in mind the reasoning with the East Bergholt Judgment as to how local housing need in Babergh can be defined, it is reasonable to consider more localised assessments at a Functional Cluster level ("FC") for a Hinterland village. The East Bergholt Court Judgment sets out how 'local need' can be defined within 'Functional Cluster' sub-areas and defines local need as 'housing need in the village and its cluster, and perhaps in areas immediately adjoining it' – the Judgment does not include any direction that HVs should be treated differently to CVs in this regard (contrary to the suggestion within a recent Planning Appeal report – APP/D3505/W/20/3256969).

4.6.9 Overall housing need has been estimated in this report on the assumption that it will arise within a sub-area at a rate per household that is broadly proportionate with that suggested by the Standard Method across the district as a whole. Affordable housing need has been estimated on the basis that it will arise within a sub-area at a rate per household that is broadly proportionate with that suggested by the SHMAU. This approach suggests that the following number of market and affordable homes will be required over the remaining 2023-2037 emerging Plan period (given that the CS period has now expired):

Figure 4.6.1

Area	Minimum Local Housing Need ("LHN") - Standard Method informed (Market and Affordable) 2023 - 2037	Affordable Housing Need 2023 – 2037 (SHMAU informed)
Bentley Parish	52	14
CSM FC	414	110
RA	3,795	1,004

Source: Pioneer Analysis July 2023

4.6.10 Additional small area demographic modelling undertaken by Pioneer for the Bentley Parish and CSM FC study areas (drawing on DLUCH 2014-based household projections, ONS 2018-based household projections and 2021 Census population information, an affordability

adjustment in line with the Standard Method and the application of a vacancy rate to convert household growth into homes):

Figure 4.6.2

Area	Minimum Local Housing Need ("LHN") Based on Demographic Modelling ⁵¹ (Market and Affordable)	Affordable Housing Need at 35% of overall LHN
Bentley Parish 2023 - 2033	37 – 45	13 – 16
Bentley Parish 2023 – 2037	52 - 64	18 - 22
CSM FC 2023 – 2033	352 - 421	123 - 147
CSM FC 2023 – 2037	492 - 589	172 - 206

Source: Pioneer Analysis July 2023

- 4.6.11 This modelling suggests that when the distribution of age and sex within the population at a Parish level are taken into account the LHN (market and Affordable Housing) may range up to 64 homes over the remaining NHP period to 2037. For the CSM FC the LHN could range up to 589 homes over the remaining emerging Plan period to 2037. In both instances adjustments for increased migration would see a greater overall housing requirement.
- 4.6.12 Based on 35% Affordable Housing (in line with the level suggested to be needed within settled and emerging Plan policy) being applied to the modelled 52 to 64 overall LHN 2023 - 2037 for Bentley Parish c.18 to 22 affordable homes would need to be provided over the remaining NHP period. In the CSM FC when 35% Affordable Housing is applied to the modelled 492 to 589 overall LHN 2023 – 2037, c.172 to 206 affordable homes would need to be provided over the remaining emerging Plan period.
- 4.6.13 The adopted 35% Affordable Housing target means that 65% of the housing provided should be open market housing at a district and Parish / CSM FC level. Affordable Housing need conclusions in the SHMAU and the NHP HNA both suggest a 50% Affordable Home Ownership and 50% rented Affordable Housing tenure split.

⁵¹ PROJ 1a, 1b and 1c

4.6.14 Based on the mid-point positions suggested in Figure 4.5.5, having regard to the existing local characteristics of Bentley Parish the following mix proportions are suggested to be broadly appropriate for the application site (subject to any site specific design constraints):

Figure 4.6.3 – Indicative Housing Mix Recommendations

	Market Housing	Affordable Housing	
		Rent	Ownership
1 bedroom	0%	65%	0%
2 bedrooms	25%		50%
3 bedrooms	45%	30%	50%
4+ bedrooms	30%	5%	0%
TOTAL	100%	100%	100%

Source: Pioneer Analysis July 2023

However, the inclusion of bungalows and two bedroom homes as supported by the NHP Policy BEN 2 may result in a greater focus on two and three bedroom market housing and a greater focus on two bedroom rented Affordable Housing than suggested in the above indicative mix.

5 HOUSING SUPPLY

- 5.1 A review of data within the December 2022 Babergh district Council Housing Land Supply Position Statement (“HLPS” – the latest iteration within the Council’s housing delivery web pages as at July 2023) suggests the following overall committed supply of housing⁵² across the Study Areas:

Figure 5.1 – Committed Housing Supply

Study Area	Committed Housing Land Supply		
	Commenced	Yet to Commence	Total
Bentley Parish	15	1	16
CSM FC	300	35	335
RA	1916	517	2433

Source: Pioneer Analysis of Babergh district Council Housing Land Supply Position Statement, December 2022

- 5.2 A further breakdown of the above summary table is provided within Appendix 3 below. The Council’s data suggests a total committed supply of 16 dwellings in Bentley Parish as at the date the HLPS was published in December 2022. Across the wider CSM FC this figure is 335 and across the RA as a whole there is suggested to be a committed supply of 2,433 homes.
- 5.3 A review of the Council’s planning portal webpages suggests there have been additional permissions granted across the CSM FC since the HLPS was published amounting to a committed supply of 14 net additional dwellings (one of which is in Bentley Parish) – see Appendix 4 for additional detail. Together with the HLPS data this suggests a total committed supply of 17 dwellings in Bentley Parish and 349 across the CSM FC.
- 5.4 There may also have been additional permissions granted across the wider RA, but due to the scale of the task of reviewing this entire area these are not assessed in this report (the focus of which is Bentley Parish and the CSM FC), but can be updated when the Council publishes a new HLPS.

Affordable Housing Supply

- 5.5 The HLPS does not break housing supply down by tenure, as such there is no summary information on the number of affordable homes that are expected to flow from the above overall committed housing supply. However, on the assumption that the Council will achieve 35% affordable housing from all committed housing supply (excluding sites of under 10

⁵² i.e. housing with planning permission on sites that are either already commenced or will commence during the Plan period

dwelling) c.185 affordable homes would be provided across the RA (i.e. c.13 per annum) and 88 affordable homes across the CSM FC area over a 15 year period (2023 to 2037) (i.e. c.6 per annum) and nil such homes across Bentley Parish:

Figure 5.2 – Potential Affordable Housing Supply @ 35%

RA	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	276
Cat A Yet to Commence	252
Cat B Deliverable	0
TOTAL	528
Affordable Housing at 35%	185

NB: All Core & Hinterland & FC Villages / Parishes (i.e. the 'RA')

CSM FC	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	252
Cat A Yet to Commence	0
Cat B Deliverable	0
TOTAL	252
Affordable Housing at 35%	88

NB: CSM FC Core & Hinterland & FC Villages / Parishes

Bentley Parish	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	0
Cat A Yet to Commence	0
Cat B Deliverable	0
TOTAL	0
Affordable Housing at 35%	0

NB: Bentley Parishes

Source: Pioneer Analysis of Babergh district Council December 2022 Housing Land Supply Position Statement and Council's planning portal for period August 2022 to July 2023

- 5.6 However, based on past trends, despite having a 35% affordable housing policy in place in adopted CS policy, the Joint Babergh and Mid-Suffolk Annual Monitoring Report 2021/22 ("AMR") Table 4 suggests that over the past seven years (2015/16 to 2021/22) just under 21% of all net completions have been affordable housing. If this same level of affordable housing is all that is achieved going forwards c.111 affordable homes would be provided across the RA over a 14 year period (2023 to 2037) (i.e. c.8 per annum) and c.53 across the CSM FC (c.4 per annum) from sites of 10 units or more and nil such homes across Bentley Parish:

Figure 5.3 – Potential Affordable Housing Supply @ 21%

RA	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	276
Cat A Yet to Commence	252
Cat B Deliverable	0
TOTAL	528
Affordable Housing at 22%	111

NB: All Core & Hinterland & FC Villages / Parishes (i.e. the 'RA')

CSM FC	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	252
Cat A Yet to Commence	0
Cat B Deliverable	0
TOTAL	252
Affordable Housing at 22%	53

NB: CSM FC Core & Hinterland & FC Villages / Parishes

Bentley Parish	
Committed Supply Sites of 10 Units or More	
	All
Cat A Commenced	0
Cat A Yet to Commence	0
Cat B Deliverable	0
TOTAL	0
Affordable Housing at 22%	0

NB: Bentley Parishes

Source: Pioneer Analysis of Babergh district Council December 2022 Housing Land Supply Position Statement, the Council's planning portal for period August 2022 to July 2023 and the Joint Babergh and Mid-Suffolk Annual Monitoring Report 2021/22, December 2022

6 CONCLUSION

- 6.1 Bentley is described as a 'Hinterland Village' within the adopted Babergh CS Policy CS2 and lies wholly within the Capel St Mary 'Functional Cluster' ("CSM FC") set out within Map 4 in the CS and is situated within the Parish of the same name (i.e. Bentley).
- 6.2 Analysis has been undertaken to look at a range of local characteristics based on 2021 Census data in Bentley Parish and the Capel St. Mary Functional Cluster. From this analysis it is clear that the area has:
- Lower levels of younger working households (particularly among 25 to 39 year olds) in the Parish and CSM FC compared to older working and retirement age households (50 years +),
 - a relatively high proportion of couples aged over 66 compared to the district, region and nationally,
 - lower proportions of single people under 66 and lone parents with dependent children compared to the wider area,
 - the majority of households as owner-occupiers,
 - very low levels of Affordable Home Ownership housing,
 - higher house prices than the district average, and,
 - a higher proportion of detached homes compared to the district, region and nationally, with lower proportions of flats semi-detached and terraced housing types.
- 6.3 The adopted 35% Affordable Housing target means that 65% of the housing provided should be open market housing at a district and Parish / CSM FC level. Affordable Housing need conclusions in the SHMAU and the NHP HNA both suggest a 50% Affordable Home Ownership and 50% rented Affordable Housing tenure split.
- 6.4 Having regard to updated 2021 Census informed housing mix projections for the district to establish local need and the existing local characteristics of Bentley Parish / CSM FC the following mix proportions are suggested to be broadly appropriate for the application site (subject to site specific design and masterplanning constraints):

Indicative Housing Mix Recommendations

	Market Housing	Affordable Housing	
		Rent	Ownership
1 bedroom	0%	65%	0%
2 bedrooms	25%		50%
3 bedrooms	45%	30%	50%
4+ bedrooms	30%	5%	0%
TOTAL	100%	100%	100%

Source: Pioneer Analysis July 2023

However, the inclusion of bungalows and two bedroom homes as supported by the NHP Policy BEN 2 may result in a greater focus on two and three bedroom market housing and a greater focus on two bedroom rented Affordable Housing than suggested in the above indicative mix.

- 6.5 Delivering a range of house sizes / types suitable for younger working age families and older person downsizers is appropriate given the local characteristics in terms of household composition, age and existing housing stock and to encourage the retention of younger working age families.
- 6.6 In terms of overall housing need the NPPF requires strategic housing policies to address objectively assessed needs in accordance with the presumption in favour of sustainable development and it is unclear that the planned distribution of housing within the CS (which predates the current NPPF) reflects the distribution of housing need. In terms of the emerging Local Plan this is yet to be adopted and the settlement hierarchy and development distribution aspects of emerging Plan policy will now be dealt with through a Part 2 Local Plan which is yet to be examined / found sound.
- 6.7 The application site is likely to be subject to housing requirement pressures arising not only from within Bentley Parish, but also from within the wider Capel St Mary Functional Cluster. These housing requirement pressures will apply to both market and affordable housing and where insufficient new provision is made within this sub-area affordability in the Parish and the areas that lie within the Functional Cluster and across the wider Core Village / Hinterland Villages (i.e. the wider 'Rural Area') will progressively worsen.
- 6.8 Taking these policy and locational factors together, and given the lack of an up to date adopted approach to housing distribution across the rural parts of the district and the continuing lack of clarity on how sub-area housing needs should be assessed, when seeking to understand how the application proposals will assist with addressing housing need, it is

appropriate to consider the need for housing across the Core Villages and Hinterland Villages and other villages within the Functional Clusters as a whole (i.e. across the rural area “RA”).

6.9 Bearing in mind the reasoning with the East Bergholt Judgment as to how local housing need in Babergh can be defined, it is reasonable to consider more localised assessments at a Functional Cluster level (“FC”) for a Hinterland village. The East Bergholt Court Judgment sets out how ‘local need’ can be defined within ‘Functional Cluster’ sub-areas and defines local need as ‘housing need in the village and its cluster, and perhaps in areas immediately adjoining it’ – the Judgment does not include any direction that HVs should be treated differently to CVs in this regard (contrary to the suggestion within a recent Planning Appeal report – APP/D3505/W/20/3256969). On this basis three study areas are applied in this report:

- Rural Area (“RA”)
- Bentley Parish
- Capel St Mary Functional Clusters (“CSM FC”)

Within the context of these study areas, albeit with the main focus on Bentley Parish and the CSM FC, the need for additional housing and affordable housing and what is an appropriate amount of such development within Bentley Parish has been considered.

Local Housing Need (Market and Affordable)

6.10 Sub-area local authority level assessment is not undertaken within any of the SHMA17 documents or subsequent SHMAU and the AECOM 2020 Bentley Parish Housing Needs Assessment (“HNA”) prepared in support of the Bentley Neighbourhood Plan is predicated on emerging plan settlement hierarchy / development distribution approaches which will now not be settled until Part 2 of the emerging Local Plan is progressed through the examination process and draws on 2011 Census data sources which have since updated through the 2021 Census. As such, the HNA conclusions on housing and Affordable Housing reflect older data sources than are now available and relies on emerging policy approaches that are not adopted and subject to change through the preparation of Part 2 of the Local Plan.

6.11 This report undertakes two approaches to the assessment of overall local housing need (i.e. across all tenures). The first ‘Standard Method Aligned’ approach assumes that this new

need will arise within a sub-area at a rate per person that is broadly proportionate with that suggested by the Standard Method across the district as a whole. This suggests a need for 3,795 homes across the RA, for 414 homes across the CSM FC and for 52 homes across the Parish 2023 to 2037.

- 6.12 The second approach uses additional small area demographic modelling undertaken by Pioneer for the Bentley Parish and CSM FC study areas drawing on DLUCH 2014-based household projections, ONS 2018-based household projections, 2021 Census population information, an affordability adjustment in line with the Standard Method and the application of a vacancy rate to convert household growth into homes. This modelling is based on a 2023 to 2033 ten year period (in line with the Standard Method calculation approach within the HLPS which also uses a ten year timeframe) and is then applied to the 2023 – 2037 period.
- 6.13 This demographic modelling suggests that, when the distribution of age and sex within the population at a sub-area level are taken into account, the Local Housing Need for Bentley Parish may in fact range between 52 to 64 homes over the 2023 to 2037 period. For the same period across the CSM FC a need for 492 to 589 homes is suggested. However, adjustments for increased migration would see an increased overall housing requirement.
- 6.14 Assuming that Affordable Housing need will arise within a sub-area at a rate per household that is broadly proportionate with that assessed in the SHMAU for the district, a need for c.14 Affordable Homes across Bentley Parish, for 110 Affordable Homes across the CSM FC and for 1,004 Affordable Homes across the RA is suggested for the 2023 to 2037 period.
- 6.15 Furthermore, the policy decision has been taken by the Council that 35% of housing overall across all Functional Cluster sub-areas in the district (subject to viability) is needed as affordable housing to assist with addressing the requirements for this type of housing. On the basis that 35% of the overall housing requirement suggested by the additional demographic modelling within this report will be needed as affordable housing in line with longstanding policy objectives, a need for 18 to 22 affordable homes would need to be provided across Bentley Parish over the 2023 to 2037 period, whilst 172 to 206 such homes would be needed across the CSM FC.

Overall Housing Supply

- 6.16 The local housing and affordable housing need across the study areas during the emerging Plan period should be considered in the context of the likely housing land supply available during 2023 – 2037.
- 6.17 Based on Council data a total net committed supply (i.e. homes with planning permission) of 17 homes across Bentley Parish, of 349 homes across the CSM FC and 2,433 across the RA study areas is suggested, although the entire time frame for the delivery of this is not stated, it is assumed to fall within the 2023 to 2037 remaining emerging Plan period.

Affordable Housing Supply

- 6.18 Not all sites will contribute affordable housing; some will fall below the site size threshold set in national policy (less than 10 dwellings / less than 0.5 hectares) and proposed through emerging JLP Policy and others will underdeliver due to viability or other site specific issues.
- 6.19 At 35% the likely supply of affordable housing from eligible sites (10 dwellings 0.5 hectares or more) within the committed housing land supply is suggested to provide c.88 affordable homes across the CSM FC and 185 across the RA. This is if all sites are viable at this level of affordable housing provision and are delivered during the 2023 – 2037 period. Nil such homes are suggested across Bentley Parish .
- 6.20 However, based on past trends, despite having a 35% affordable housing policy in place in adopted CS policy, the Babergh and Mid-Suffolk Annual Monitoring Report 2021/22 suggests that over the past seven years (2015/16 to 2021/22) just under 21% of all net completions have been affordable housing. If this trend continued to apply it would see c.53 affordable homes across the CSM FC and 111 across the RA during the 2022 to 2037 period unless additional land is permitted for housing development.

Summary

- 6.21 Bringing the evidence of local housing need (including affordable housing need) and supply together analysis suggests that the Council will fail to address local housing need arising in Bentley Parish, or in in the CSM FC and RA study areas during the 2023 to 2037 period.
- 6.22 Based on the scenarios modelled using more recent 2018-SNPP based household projections and having regard to potential 2021 Census population changes, it is suggested

that in all of the study areas a significant increase in overall housing supply to that already committed through extant planning permissions will need to be identified:

Figure 6.1 -

Shortfall in Overall Housing Supply – Market and Affordable Housing 2023 - 2037

	Study Area	Overall Local Housing Need 2023 - 2037	Total Committed Supply (based on HLPs and Planning Portal Analysis)	Shortfall / Surplus in Overall Housing Supply to Meet the Local Housing Need 2023-2037
Based on HLPs Standard Method LHN	Bentley	52	17	minus 35
Demographic Modelling (PROJ1a, 1b and 1c and PROJ3)	Parish	52 - 64	17	minus 35 to minus 47
Based on HLPs Standard Method LHN	CSM FC	414	349	minus 65
Demographic Modelling (PROJ1a, 1b and 1c and PROJ3)		492 - 589	349	minus 143 to minus 240
Based on HLPs Standard Method LHN	RA	3,795	2,433	minus 1,362

Source: Pioneer Analysis July 2023

- 6.23 Specifically in respect of Affordable Housing the outlook is bleak unless the Council identifies additional land for housing during the remaining emerging plan period:

Figure 6.2 -

Shortfall in Affordable Housing Supply 2023 - 2037

	Study Area	Affordable Housing Need 2023 - 2037	If 35% Affordable Housing Achieved		If 21% Affordable Housing Achieved	
			Potential Supply @ 35% of Overall Committed Housing Supply (Sites of 10 units or more)	Shortfall / Surplus in Affordable Housing Supply to Meet the Affordable Housing Need 2023-2037	Potential Supply @ 21% of Overall Committed Housing Supply (Sites of 10 units or more)	Shortfall / Surplus in Affordable Housing Supply to Meet the Affordable Housing Need 2023-2037
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	Bentley	14	0	minus 14	0	minus 14
Needed at 35% of Demographic Modelling Housing Need Outputs (PROJ1a, 1b and 1c and PROJ3)	Parish	18 - 22	0	minus 18 to minus 22	0	minus 18 to minus 22
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	CSM FC	110	88	minus 22	53	minus 57
Needed at 35% of Demographic Modelling Housing Need Outputs (PROJ1a, 1b and 1c and PROJ3)		172 - 206	88	minus 84 to minus 118	53	minus 119 to minus 153
Based on Affordable Housing Arising per head of population in line with SHMAU District Conclusions	RA	1,004	185	minus 819	111	minus 893

Source: Pioneer Analysis July 2023

- 6.24 The overall level of committed housing supply is suggested to be insufficient to meet the identified needs within this housing need assessment in Bentley Parish in the next 14 year period – falling short by between 35 to up to 47 homes depending upon the projection. The minimum end of this shortfall (at 35 homes) is based on 2014-SNPP informed household projections which will continue to be used in the Standard Method calculation until reviewed by the Government (as confirmed in the January 2023 draft NPPF).

- 6.25 Housing need pressures in the Parish are likely to be even greater given that it falls within a rural part of the wider CSM FC which itself is suggested to be subject to a shortfall of between 65 to up to 240 homes between 2023 and 2037 depending on the projection.
- 6.26 Across the wider RA the housing shortfall, based on housing need arising at a rate per head of population proportionate to that at a district level suggested by the Standard Method, is suggested to amount to 1,362 homes between 2023 and 2037.
- 6.27 Policy CS11 is clear that core *and* hinterland villages have a role to play in delivering identified needs across the rural area. Whilst proportionate increases to settlements are ill defined within the adopted CS and the CS11 SPD, it is considered that the delivery of up to 24 new homes in Bentley is justified in the context of the significant projected need identified for new market and Affordable Housing in the Parish (and in the wider Functional Cluster in which the Parish is situated) which will not be met by the committed housing supply currently identified.
- 6.28 In particular, across Bentley Parish a minimum shortfall of 14 affordable homes is suggested during 2023 to 2037 based on need arising at a rate that is proportionate per head of population to that arising across the district as a whole, although this increases to up to 22 depending on the projection and assuming need at 35% of the overall modelled housing requirement – this suggests that a significant shortfall in Affordable Housing will accrue in the Parish unless additional supply sources are identified. Across the wider CSM FC the shortfall of Affordable Housing could range between 22 and 118 dwellings and across the RA a shortfall of 819 Affordable Homes could accrue during 2023 to 2037. The Affordable Housing need across these areas could be greater still where less than 35% Affordable Housing is secured from the committed supply of sites of 10 dwellings or more.
- 6.29 Nationally, we remain in the middle of a national housing crisis. A total of 1,151,550 net additional dwellings (of all tenures) are reported by Government data (Live Table 120, DLUHC) to have been provided between 2017/18 and 2021/22, which against the Government's own 300,000 target for this period results in a 348,450 shortfall in homes.
- 6.30 Research commissioned by Crisis and the National Housing Federation (Housing supply requirements across Great Britain: for low-income households and homeless people, Professor Glen Bramley, November 2018) states that there is '*a backlog of housing need of 4.75 million households across Great Britain (4 million in England)*' and concludes nearer

c.340,000 homes (of all tenures) need to be built annually in England if a 'meaningful levelling of affordability differences' is to be achieved.

- 6.31 In addition to this national housing need context Secretary of State and appeal decisions confirm that affordable housing is an important material consideration, that the need to address affordable housing requirements is acute and urgent, and that the Secretary of State has routinely attached 'significant weight' and 'substantial weight' to the provision of affordable housing. Even when a five-year housing land supply exists, when Plans are up to date, when affordable housing proposals do not exceed or are below policy requirements and when on Greenbelt land, the material benefits of affordable housing proposals have still been concluded within the current planning framework to be able to weigh substantially in favour of development proposals.
- 6.32 As a Hinterland Village the provision of additional homes on the scale proposed on the application site to assist with meeting the assessed shortfall in homes available to meet the projected local housing need 2023 to 2037 and providing much needed Affordable Housing accords with the provisions within Policy CS11 for development within Hinterland Villages and is a benefit of very significant material weight in favour of the planning application.

7 Appendices

7.1 Appendix 1 – Babergh Rural Area

Parish	Core / Hinterland / Other Village	Mid-2011 Population	Mid-2020 Population	2021 Census Population	2021 Census Notes
Acton	Hinterland	1,814	1,868	1,850	
Aldham	Hinterland	176	184	182	
Alpheton	Other FC Village	257	272	285	
Arwarton	Other FC Village	127	125	123	
Assington	Hinterland	402	462	514	
Belstead	Hinterland	202	205	252	
Bentley	Hinterland	778	805	826	
Bildeston	Core	1,061	1,127	1,096	
Boxford	Core	1,226	1,370	1,403	
Boxted	Core	212	178	194*	inc. Somerton
Brantham	Hinterland	2,566	2,542	2,606	
Brent Eleigh	Hinterland	173	174	173	
Brettenham	Hinterland	356	327	321	
Bures St. Mary	Core	922	975	1017	
Burstall	Hinterland	198	230	220	
Capel St. Mary	Core	2,851	2,976	3,108	
Chattisham	Other FC Village	167	176	170	
Chelmondiston	Hinterland	1,061	1,065	1,026	
Chelsworth	Hinterland	205	220	212*	inc. Kettlebaston
Chilton	Other FC Village	366	363	348	
Cockfield	Hinterland	870	884	938	
Copdock and Washbrook	Hinterland	1,108	1,192	1,130	
East Bergholt	Core	2,774	2,970	2,723	
Edwardstone	Hinterland	355	338	375	
Elmsett	Hinterland	792	783	819	
Freston	Other FC Village	121	118	122	
Glemsford	Core	3,400	3,672	3,693	
Great Waldingfield	Hinterland	1,428	1,700	1,684	

Parish	Core / Hinterland / Other Village	Mid-2011 Population	Mid-2020 Population	2021 Census Population	2021 Census Notes
Groton	Other FC Village	288	348	299	
Harkstead	Hinterland	287	300	314	
Hartest	Hinterland	446	509	471	
Higham	Other FC Village	204	184	180*	inc. Shelley
Hintlesham	Hinterland	607	658	695	
Hitcham	Hinterland	775	764	346	
Holbrook	Core	2,185	2,147	2,146	
Holton St. Mary	Hinterland	198	239	236	
Kersey	Hinterland	359	310	321	
Kettlebaston	Other FC Village	n/a	n/a	n/a	inc. with Chelsworth
Lavenham	Core	1,724	1,886	1,922	
Lawshall	Hinterland	964	1,022	991	
Layham	Hinterland	591	597	584	
Leavenheath	Hinterland	1,374	1,304	1,280	
Lindsey	Other FC Village	207	223	188	
Little Cornard	Other FC Village	286	324	310	
Little Waldingfield	Hinterland	361	394	364	
Long Melford	Core	3,524	3,768	3,895	
Milden	Other FC Village	100	109	120	
Monks Eleigh	Hinterland	506	508	503	
Nayland-with- Wissington	Core	1,165	1,178	1,166	
Nedging-with- Naughton	Hinterland	403	387	412	
Newton	Hinterland	491	526	549	
Pinewood	Other FC Village	4,371	4,488	4,364	
Polstead	Hinterland	857	884	861	
Preston St. Mary	Hinterland	176	198	196	
Raydon	Hinterland	509	541	542	
Semer	Other FC Village	131	142	134	
Shelley	Other FC Village	n/a	n/a	n/a	inc. with Highham
Shimpling	Hinterland	433	435	450	

Parish	Core / Hinterland / Other Village	Mid-2011 Population	Mid-2020 Population	2021 Census Population	2021 Census Notes*
Shotley	Hinterland	2,339	2,342	2,259	
Somerton	Other FC Village	n/a	n/a	n/a	inc. with Boxsted
Sproughton	Hinterland	1,373	1,428	1,477	
Stanstead	Hinterland	317	364	362	
Stoke-by-Nayland	Hinterland	679	637	690	
Stratford St. Mary	Hinterland	699	808	753	
Stutton	Hinterland	811	829	816	
Tattingstone	Hinterland	542	550	527	
Thorpe Morieux	Other FC Village	232	288	289	
Wattisham	Hinterland	413	410	439	
Wenham Magna	Other FC Village	185	184	185	
Wenham Parva	Other FC Village	n/a	n/a	n/a	inc. with Wenham Magna
Whatfield	Hinterland	334	381	390	
Wherstead	Other FC Village	344	326	322	
Woolverstone	Hinterland	262	288	265	
	TOTAL	58,020	60,509	60,023	

Source: Mid-2020 Population Estimates, 2011 and 2021 Census data, Office for National Statistics ("ONS") ONS Crown Copyright Reserved *Adjusted to remove duplications within 2011 and 2020 estimates and to align with 2021 Census Output Areas

7.2 Appendix 2 – FC Output Areas in Demographic Modelling

Parish	Core / Hinterland / Other Village	2011 Census OA	2021 Census OA
Bentley	Hinterland	E00152271	E00152271
Bentley	Hinterland	E00152272	E00152272
Bentley	Hinterland	E00152273	E00152273
Capel St. Mary	Core	E00152389	E00152389
Capel St. Mary	Core	E00152390	E00152390
Capel St. Mary	Core	E00152391	E00152391
Capel St. Mary	Core	E00152392	E00152392
Capel St. Mary	Core	E00152393	E00152393
Capel St. Mary	Core	E00152394	E00152394
Capel St. Mary	Core	E00152395	E00152395
Capel St. Mary	Core	E00152396	E00152396
Capel St. Mary	Core	E00152397	E00152397
Capel St. Mary	Core	E00152398	E00152398
Copdock and Washbrook	Hinterland	E00152255	E00152255
Copdock and Washbrook	Hinterland	E00152256	E00152256
Copdock and Washbrook	Hinterland	E00152257	E00152257
Copdock and Washbrook	Hinterland	E00152258	E00152258
Holton St. Mary	Hinterland	E00152399	E00152399
Raydon	Hinterland	E00152387	E00152387
Raydon	Hinterland	E00152388	E00152388
Tattingstone	Hinterland	E00152212	E00152212
Tattingstone	Hinterland	E00152213	E00152213
Wenham Magna	Other FC Village	E00152402	E00152402
Wenham Parva	Other FC Village	E00152402	

Source: 2011 and 2021 Census Output Areas ("OA")

7.3 Appendix 3 – December 2022 Babergh Housing Land Supply Position Statement Analysis

	Committed Housing Land Supply
Bentley Parish	
Commenced Sites	Core & Hinterland & FC Villages / Parishes
Category A Major: Full Planning permission	0
Category A Major: Reserved Matters	0
Category A Major: Permitted Development	0
Category A Non-Major: Full Planning permission	13
Category A Non-Major: Reserved Matters consent	2
Category A Non-Major: Outline	0
Category A Non-Major: Permitted Development	0
TOTAL	15

	Committed Housing Land Supply
Bentley Parish	
Yet to Commence	Core & Hinterland & FC Villages / Parishes
Category A Major: Full Planning permission	0
Category A Major: Reserved Matters	0
Category A Major: Permitted Development	0
Category A Non-Major: Full Planning permission	0
Category A Non-Major: Reserved Matters consent	0
Category A Non-Major: Outline	0
Category A Non-Major: Permitted Development	0
Category B Outline	0
Prior Approval	1
TOTAL	1

Source: December 2022 Babergh Housing Land Supply Position Statement, Pioneer Analysis July 2023

	Committed Housing Land Supply
CSM FC	
Commenced Sites	Villages / Parishes
Category A Major: Full Planning permission	152
Category A Major: Reserved Matters	100
Category A Major: Permitted Development	0
Category A Non-Major: Full Planning permission	31
Category A Non-Major: Reserved Matters consent	17
Category A Non-Major: Outline	0
Category A Non-Major: Permitted Development	0
TOTAL	300

	Committed Housing Land Supply
CSM FC	
Yet to Commence	Villages / Parishes
Category A Major: Full Planning permission	0
Category A Major: Reserved Matters	0
Category A Major: Permitted Development	0
Category A Non-Major: Full Planning permission	12
Category A Non-Major: Reserved Matters consent	8
Category A Non-Major: Outline	14
Category A Non-Major: Permitted Development	0
Category B Outline	0
Prior Approval	1
TOTAL	35

Source: December 2022 Babergh Housing Land Supply Position Statement, Pioneer Analysis July 2023

	Committed Housing Land Supply
RA	
Commenced Sites	Core & Hinterland & FC Villages / Parishes
Category A Major: Full Planning permission	697
Category A Major: Reserved Matters	921
Category A Major: Permitted Development	5
Category A Non-Major: Full Planning permission	210
Category A Non-Major: Reserved Matters consent	75
Category A Non-Major: Outline	0
Category A Non-Major: Permitted Development	8
TOTAL	1916

	Committed Housing Land Supply
RA	
Yet to Commence	Core & Hinterland & FC Villages / Parishes
Category A Major: Full Planning permission	14
Category A Major: Reserved Matters	262
Category A Major: Permitted Development	0
Category A Non-Major: Full Planning permission	136
Category A Non-Major: Reserved Matters consent	40
Category A Non-Major: Outline	46
Category A Non-Major: Permitted Development	18
Category B Outline	0
Prior Approval	1
TOTAL	517

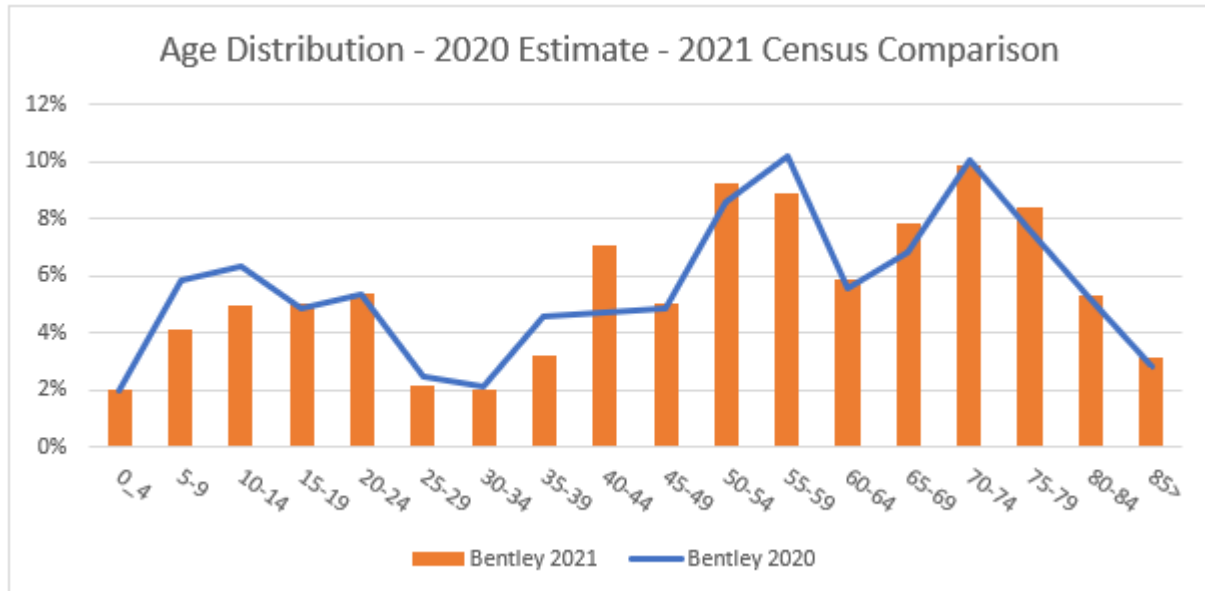
Source: December 2022 Babergh Housing Land Supply Position Statement, Pioneer Analysis July 2023

7.4 Appendix 4 – Permissions Granted Since December 2022

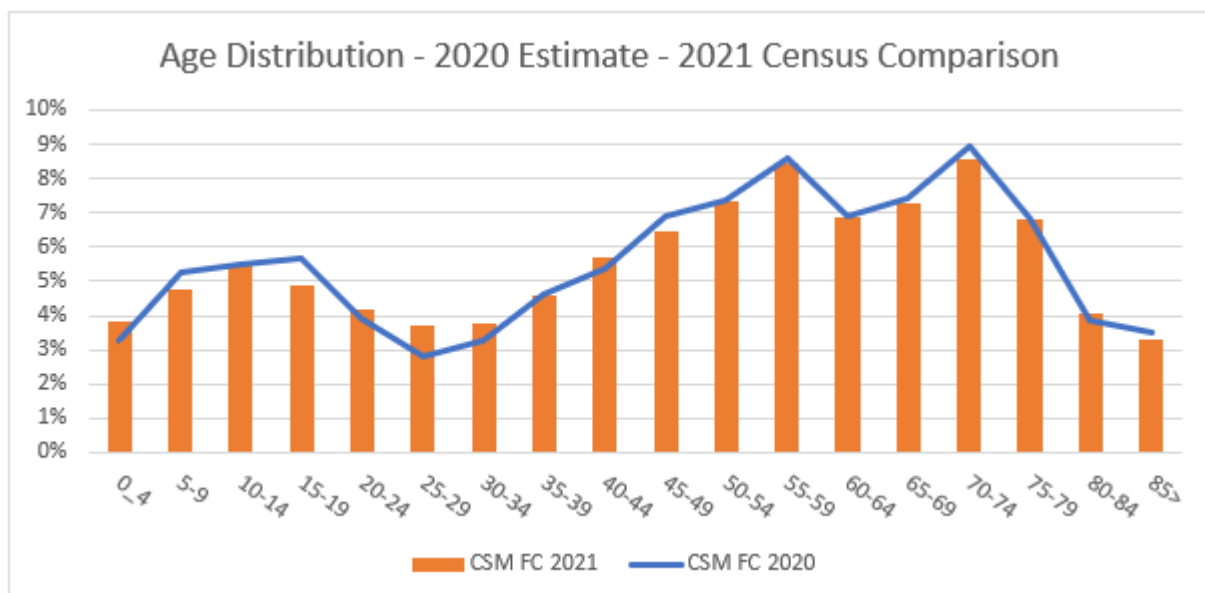
Permissions Granted Across CSM FC Since HLPs December 2022		
	Plannign Application Reference	Net Dwellings
Bentley	DC/22/04762	1
Capel St Mary	n/a	n/a
Copdock and Washbrook	DC/22/02338	1
Copdock and Washbrook	DC/22/05086	1
Holton St Mary	n/a	n/a
Raydon	DC/22/05775	7
Tattingstone	DC/22/03710	4
Wenham Magna	n/a	n/a
Wenham Parva	n/a	n/a
Total		14

Source: Pioneer Analysis (July 2023) of Babergh Planning Portal for CSM FC Parishes – August 2022 to July 2023

7.5 Appendix 5 – Age Distribution: 2020 Estimate – 2021 Census Comparison



Source: Mid-2020 Population Estimates and 2021 Census data, Office for National Statistics ("ONS") ONS Crown Copyright Reserved – Bentley Parish



Source: Mid-2020 Population Estimates and 2021 Census data, Office for National Statistics ("ONS") ONS Crown Copyright Reserved – CSM FC Parishes