



## **Indicative Housing Requirement – Bungay Neighbourhood Plan**

### **August 2021 (Draft)**

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

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

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

### **Assessing the indicative housing requirement**

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

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

	<p>purpose community centre for the town as well as support the shops and services of the town centre.” (paragraphs 5.1 and 5.2 of the Waveney Local Plan)</p> <p>6% of new residential development in the Local Plan is distributed to Bungay.</p> <p>Based upon the methodology, it is not expected that housing would be planned for in the Broads area and the indicative requirement for that part of the Neighbourhood Area is zero.</p>
Population of the Neighbourhood Area	5,112 (2019 population estimate – source Suffolk observatory <sup>1</sup> )
Current Local Housing Need figure	<p>Former Waveney district = 374 dwellings per annum (April 2021<sup>2</sup>)</p> <p>This figure is the same as the housing requirement in the Waveney Local Plan.</p>
<b>Local needs</b>	
Local needs for housing identified through a local housing need assessment where relevant	<p>A Housing Needs Assessment has been produced by Aecom (March 2018). This does not identify an overall housing requirement but does identify needs related to housing size, affordable housing, and housing for older people.</p> <p>The Housing Needs Assessment recommends that most new housing would need to be two or three bedroom, however based on the conclusions it is considered that this could be addressed by policies related to housing mix. The evidence does not point to a need for further housing growth to accommodate this.</p> <p>The Housing Needs Assessment identifies a housing need for older people of between 110 and 218 specialist dwellings, however notes that these do not all need to be provided in the Neighbourhood Area and that these figures do not take account of current provision. The assessment concludes that these do not need to be accounted for in the Neighbourhood Plan housing target as there is some overlap.</p> <p>The Housing Needs Assessment identifies around 150 households with the potential to be formed, however concludes that no further adjustment is needed provided that a substantial share of new dwellings are one and two bedroom.</p> <p>It is not considered that the housing needs assessment would therefore inform an adjustment the indicative housing requirement, although the Qualifying Body may wish to consider appropriate housing mix policies to address the needs identified.</p>

<sup>1</sup> [www.suffolkobservatory.info/population/report/view/62646f73d23e489098a5cdad7a116eed/E04009490](http://www.suffolkobservatory.info/population/report/view/62646f73d23e489098a5cdad7a116eed/E04009490)

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

[www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/13107housepricetoworkplacebasedearninratioforformerlocalauthorities2019to2020](http://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/13107housepricetoworkplacebasedearninratioforformerlocalauthorities2019to2020)

[www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables](http://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables)

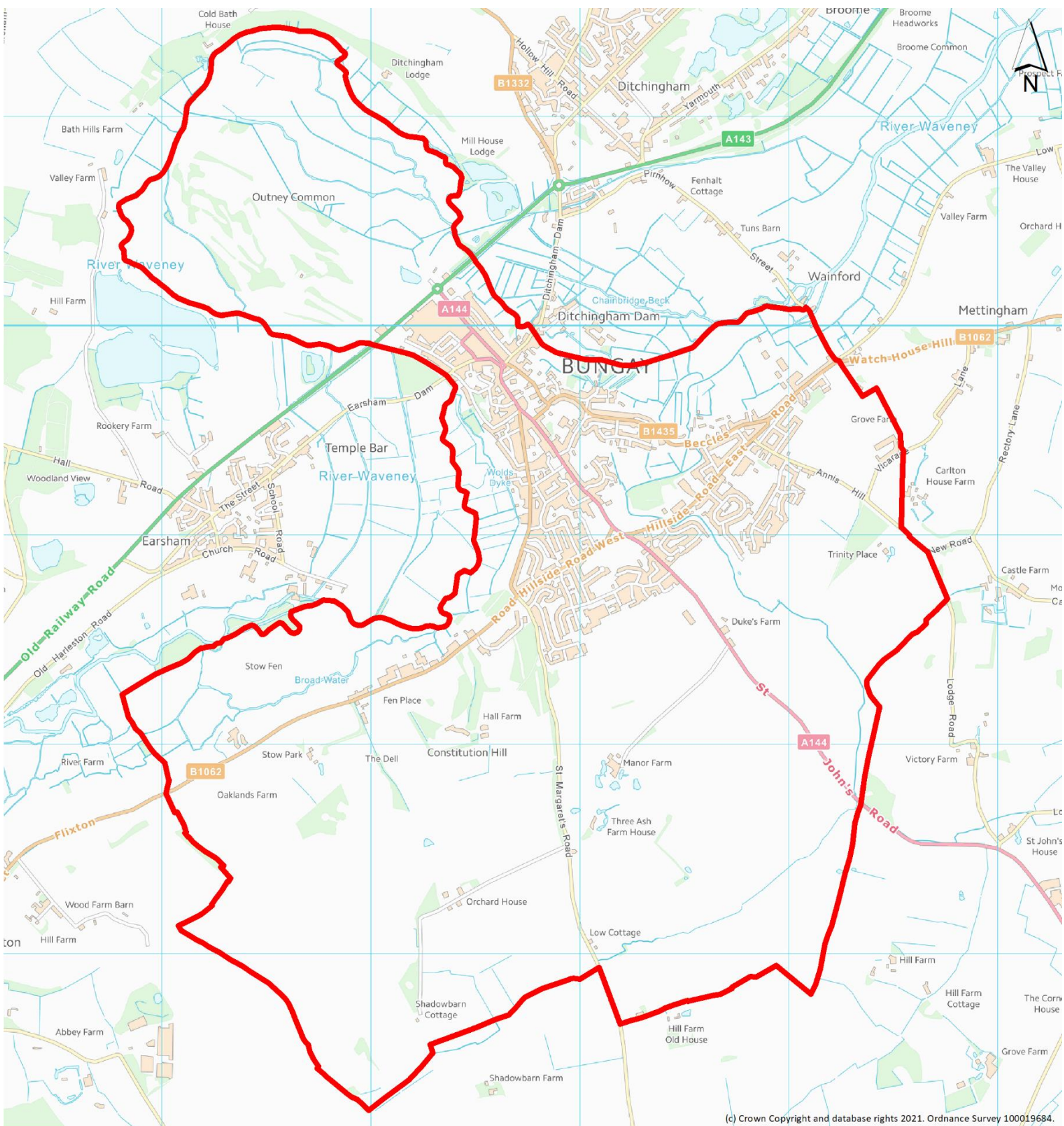
<b>Constraints</b>	
Environmental designations	<p>The Local Plan, in its Strategy for Bungay, explains that this strategy allows for modest growth which protects the sensitive landscape around the town which is well related to the Broads. The issues in Bungay are set out in the Local Plan (page 16) which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

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

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



## Appendix A: Bungay Neighbourhood Plan area

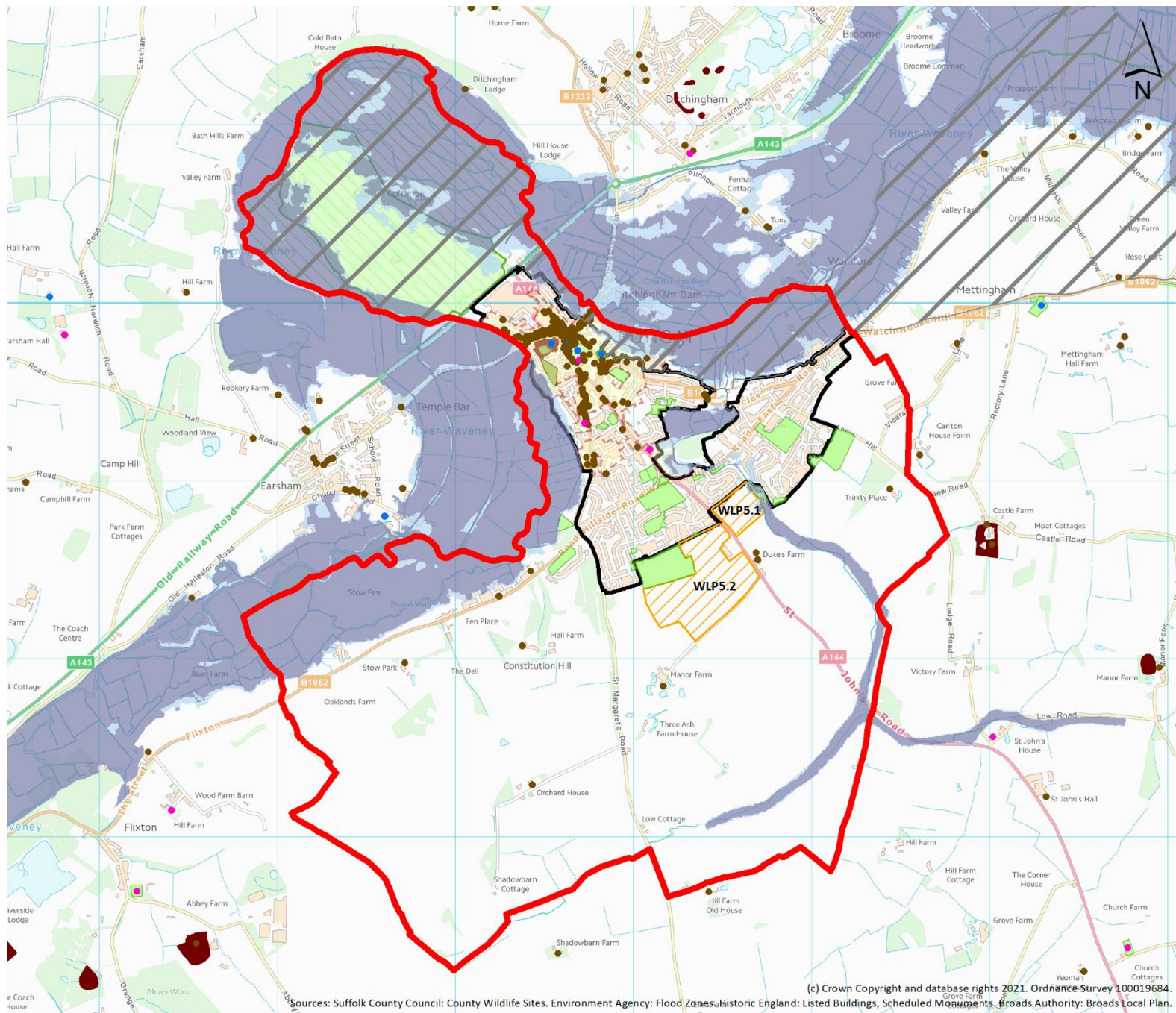
















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 Bungay Neighbourhood Area



## Appendix B: Bungay Neighbourhood Plan area – key constraints



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

## Appendix C: Infrastructure information

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

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



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

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

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