

Ipswich Borough Council Local Plan

Examination of Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

Stage 2 Matters and Questions - Response to Matter 3: Policies CS6 and CS7

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IPSWICH
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Following the stage 1 hearings in March 2016 and the publication of the Inspector's Interim Findings report on 19th April 2016, this statement contains the Council's proposed amendments in respect of the following:

- **Policy CS6 – identification of the specific actions the Council will take (and the relevant timescales) in connection with the Duty to Co-operate, the Ipswich Policy Area and addressing unmet housing needs.**
- **Policy CS7 – the objectively-Assessed Need for Housing.**
- **A policy concerning Five Year Housing Land Supply policy and its implications for development management (including policy DM34) and discussion of the basis on which the 5 year supply calculation should be made.**

Note that the revisions to Policy CS7 below incorporate the requirement of the third bullet point relating to five year housing land supply.

POLICY CS6 THE IPSWICH POLICY AREA

8.67 Ipswich has relatively tight administrative boundaries and clearly there are cross boundary issues that are relevant to the development and future of the Borough, the urban area of Ipswich and surrounding areas.

8.68 This has long been recognised within the former Suffolk Structure Plan via the identification of the 'Ipswich Policy Area'. The Ipswich Policy Area consists of parts of the areas of Suffolk County Council, Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council and the whole of Ipswich Borough's area, and the Ipswich Policy Area Board consists of councillors and is a key vehicle for cross boundary planning. The boundary of the Ipswich Policy Area is mapped at Appendix 3 for information. The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans. The Ipswich Policy Area sits within the wider Ipswich Housing Market Area and Ipswich Functional Economic Area, both of which cover the whole of the four planning authority areas.

8.69 In planning strategically for housing, employment and infrastructure provision, the Council will need to continue to work closely with neighbouring local authorities to ensure a coordinated approach in line with the Duty to co-operate.

POLICY CS6: THE IPSWICH POLICY AREA

Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich, ~~in order to deliver appropriate development.~~ It will achieve this in a variety of ways:

~~a. Formal working through the Ipswich Policy Area Board or other relevant forums and developing a jointly agreed strategy;~~

~~ab. Joint working on Local Plan evidence gathering, monitoring and updating, to ensure a consistent approach; and~~

b. The production of joint or aligned local plans; and

c. Joint working to develop shared approaches to delivery, such as that for strategic green infrastructure and strategic development sites.

8.70 The Council recognises the importance of joint working on Ipswich Policy Area matters. ~~At present this is~~ Previously this has been achieved through joint working on evidence base documents to inform development plan documents. ~~In the future, the preparation of joint or aligned development plan documents is to be explored.~~ However, in order to address the constraints to meeting development needs in Ipswich Borough, due to the constrained nature of the boundary, there is a need to work on joint or aligned local plans with neighbouring authorities. Work is to commence in 2016 with the aim of having the plans adopted by 2019. The preparation of joint or aligned development plan documents ~~is is to be explored later in the plan period, to~~ will ensure a coordinated approach to meeting the objectively assessed housing needs of the Ipswich housing market area and achieving economic growth.

8.71 The Borough Council will continue to comment on key strategic planning applications in neighbouring authorities and their respective Local Plan documents. Neighbouring authorities, including parish councils, will have the opportunity to comment at all stages of the production of the Ipswich Local Plan.

8.72 Ipswich Policy Area Board involves councillors and officers from the Borough Council, the neighbouring authorities (Suffolk Coastal, Mid Suffolk and Babergh) and the County Council to focus on and discuss development issues. More details on this are provided within Chapter 10.

CS7 – THE AMOUNT OF HOUSING REQUIRED

- 8.76 The Council previously had an adopted target to allocate land to accommodate at least 14,000 additional residential dwellings between 2001 and 2021 (at 700 dwellings per annum) and a further 700 dwellings per annum thereafter to 2027. Following updated population and household projection modelling work, the Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. The 2012-based household projections, published by the Department for Communities and Local Government in February 2015, identify an increase in households of 10,435 dwellings within Ipswich Borough between 2011 and 2031. This figure is a demographic projection rather than the full Objectively Assessed Need, and as a starting point should be considered to be a minimum. Taking account of up to date evidence on market signals, the need for affordable housing and increased future migration from London, the level of Objectively Assessed Need could be substantially more.
- 8.77 Capacity constraints in the Borough mean that even the likely minimum requirement of 10,435 dwellings could never be met within the Council's administrative area. In these circumstances, rather than delay adoption of this plan whilst an updated Objectively Assessed Need for housing within the Ipswich Housing Market Area is identified, this additional work will be undertaken post-adoption as part of the production of joint or aligned local plans or a new strategic plan.
- 8.78 Joint working is taking place through the production of joint or aligned local plans being prepared by Ipswich Borough Council, Babergh/Mid Suffolk District Councils and Suffolk Coastal District Council, to conclude by 2019. Publication (under Regulation 19 of the Town and Country Planning (Local Planning (England Regulations) 2012) of the plan(s) in 2018 aligns with the timescales set out in the Council's Local Development Scheme. This joint working has the support of the Ipswich Policy Area Board and a Memorandum of Understanding is being produced by the local planning authorities and Suffolk County Council.
- 8.79 Alternative potential mechanisms are also emerging. Work has begun on a Suffolk-wide Strategic Planning and Infrastructure Framework, which is at an early stage. The Government's announcement on 16th March 2016 included the devolution of strategic planning powers to an East Anglia Combined Authority, which would represent a further alternative mechanism for strategic planning.
- 8.80 ~~8.77 Since 2001 various developments have been built or received planning permission and 6,903 dwellings were completed between 2001 and 2011. A number of developments continue to have unimplemented planning permissions and some remain under construction. Therefore, the number of dwellings that the Council will need to allocate land for through the Local Plan process is fewer than 13,550 required to 2031. Table 2 below sets out the housing land supply and minimum requirement figures as at April 2014~~2015, looking forward to 2031.

TABLE 2 HOUSING LAND SUPPLY AND MINIMUM REQUIREMENT AT APRIL 20142015

		Number of dwellings	Discounted Numbers	Cumulative
1	Dwellings completed between 2011 and 2015	1,077*	-	1,077
2	Dwellings under construction	704	-	1,781
3	Dwellings with planning permission	820	738	2,519
4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	916	824	3,343
5	<u>Minimum</u> Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2031	<u>40,207,092</u>		<u>43,550,435</u>

TABLE NOTES

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

*Line 1: Actual numbers of dwellings built between 1st April 2011 and 31st March 2015. *Includes 120 Assisted Living dwellings.*

Line 2: Dwellings under construction at 31st March 2015 - assumed that all will be completed over the plan period.

Line 3: Other dwellings with planning permission at 31st March 2015 - assumed that 10% of these will not be completed.

Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31st March 2015 - assumed that 10% of these will not be completed.

Line 5: To reach the minimum local requirement target of 43,550 10,435 dwellings by 2031 together with windfall sites, further land will need to be allocated within the Borough, and other locations within the Ipswich Policy Area Housing Market Area identified with neighbouring authorities later in the plan period, for at least 40,207 7,092 new homes.

8.81 8.78 National guidance in the National Planning Policy Framework, is that Local Planning Authorities should set out their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of the relevant development plan document.

8.82 8.79 This should include identifying a specific supply of developable sites for years 1-10 from adoption and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. In the case of Ipswich this will be within the Borough boundary at this stage but continuing future discussions are will be required with neighbouring authorities within the Ipswich Policy Area Housing Market Area due to capacity constraints. Windfall sites will also contribute to the housing supply and these are defined in the National Planning Policy Framework as sites not specifically identified as available in the Local Plan process and normally comprise previously-developed sites that have unexpectedly become available.

POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED

~~The Council will endeavour to enable housing delivery to meet its objectively assessed housing need throughout the plan period. The Council will allocate land to provide for at least an additional 5,429 dwellings net in the Borough, with a lower amount of 4,629 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb. Sites will be identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb.~~

~~The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. To meet the remaining requirement of 5,578 dwellings to 2031, the Council will rely on windfall sites and will work with neighbouring local authorities to address housing need later in the plan period.~~

A) The Council has as a starting point an objectively assessed need of at least 10,435 dwellings for the period 2011 – 2031, reflecting the DCLG 2012 Household Projections. This equates to an annual need for at least 522 dwellings.

The Council will, with its neighbours, prepare an updated Objectively Assessed Need for the Ipswich Housing Market Area and a strategy for the distribution of development to meet that need in the Ipswich Housing Market Area by spring 2017.

The results of the joint working will take the form of a joint or aligned local plan review, supported by the production of a Suffolk-wide planning framework. Policy CS7 will be reviewed as part of this joint working.

B) Due to the constrained nature of the Borough, only 9,772 dwellings (489 dwellings per annum) can be delivered to 2031.

Based upon this capacity, the Council will secure the delivery of housing of at least 489 dwellings per year within the Borough.

The Council will allocate land to provide for at least 5,429 dwellings net in the Borough, with a lower amount of 4,629 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb. Sites will be identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb.

1,800 dwellings are expected to be delivered on windfall sites between 2016 and 2031.

The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.

C) Given the extent of the minimum level of housing required and the capacity constraints within the Council's administrative area, the Council is unable to demonstrate a five year supply against the need for 10,435 dwellings, in terms of paragraph 47 of the National Planning Policy Framework.

In the absence of a five year supply of housing within the Borough, whilst the relevant policies for the supply of housing will not be treated as out of date for the purposes of national policy, the Council will nevertheless adopt a positive approach to all housing proposals such that they will be permitted unless the harm which the development would cause (including the conflict with the development plan) significantly and demonstrably outweigh the benefits of the development.

- 8.83 8.80 Table 2 shows that, as a result of housing completions between 2011 and 2015, 12,473 dwellings remain to be delivered between 2015 and 2031 in order to meet the requirement. Due to the constrained nature of the Borough boundary, not even the housing need for Ipswich can be met solely within the boundary with a supply of 9,772 to 2031 being identified (as at 1st April 2015). The Council has identified a residual need of 663 dwellings against this minimum requirement and the Council is actively working with neighbouring authorities to meet this need within the Ipswich Housing Market Area.
- 8.84 In recognition of this position, the absence of a five year supply will not have the effect that the Council's housing policies are to be treated as out of date (having regard to paragraph 49 of the National Planning Policy Framework). The Council will however adopt a positive and proactive approach towards the consideration of any planning applications for housing development.
- 8.85 The element of the Ipswich updated Objectively Assessed Need housing need which cannot be accommodated within Ipswich Borough will be met through joint working with the Council's neighbouring planning authorities.
- 8.86 8.84 Within the Borough, sites will be allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document, having regard to the strategy set out within this document and in CS10. The Council has undertaken an update to the 2010 Strategic Housing Land Availability Assessment (SHLAA) and is satisfied that sites within the Borough are capable of being delivered. ~~delivering the housing requirement in the ten years to 2025.~~ The SHLAA will be periodically updated.
- 8.86 8.82 The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans. The SHLAA informs the Council's housing trajectory. It is based on recent contact with developers and landowners. It is from this potential supply that site allocations are drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited, hence the need to consider future development opportunities beyond the Borough boundaries. Table 3 below provides a breakdown of the housing land supply whilst Table 4 provides a breakdown by delivery period. Delivery will be monitored closely through the Council's Authority Monitoring Report.
- 8.87 8.83 In working with neighbouring authorities to address housing need ~~later in the plan period,~~ consideration will need to be given to avoiding or minimising effects in these areas including environmental designations, landscape, townscape and historic assets.

TABLE 3 ESTIMATED HOUSING DELIVERY FOR 2014-2031 EXCLUDING CURRENT PERMISSIONS AS AT 1ST APRIL ~~2014~~2015

Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2014-2031
IP-One	100%	1,122
Rest of built up area	75.2%	807 (PDL: 607)
Ipswich Garden Suburb (see policy CS10)	0%	2,700
Total 2014-2031 (excluding windfall and broad locations)	37.4%	4,629 (PDL: 1,729)
Small windfall sites (fewer than 10 dwellings) 2015-2031	90%	900 (PDL: 810)
Large windfall sites (10 or more dwellings) 2020-2031	90%	900 (PDL: 810)
Residual need later in plan period	0%	3,778 <u>663</u>
Total 2014-2031	32.8%	<u>10,207</u>,<u>092</u> (PDL: 3,349)

TABLE 4 ESTIMATED HOUSING DELIVERY AND PREVIOUSLY DEVELOPED LAND (PDL) TRAJECTORY (INCLUDING SITES WITH PLANNING PERMISSION AND UNDER CONSTRUCTION BUT NOT INCLUDING WINDFALL SITES)

Time period	2001- 2011	2011-2015	2015-2031
Housing Delivery	6,903	1,077*	6,904
PDL%	94.5%	79%	52.3%