

# Ipswich Borough Council Final Draft Local Plan Review

## Topic Paper: Affordable Housing Policy in Ipswich

Evidence on the approach to affordable housing policy for Ipswich Borough to 2036

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## Introduction

### What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies Development Plan Document (DPD) (February 2017) and Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (February 2017). These documents form the Council's Local Plan, which guides future development in the Borough.
2. Draft preferred options versions of the two DPD's were published for informal public consultation between 16th January – 13th March 2019, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations').
3. Final Draft versions of the two DPD's were published for formal public consultation between 15<sup>th</sup> January – 2<sup>nd</sup> March 2020, under regulation 19 of the Regulations.
4. The emerging Core Strategy and Policies DPD ("the Final Draft Core Strategy") will replace the adopted Core Strategy and Policies DPD review when adopted (anticipated in 2021).
5. The emerging Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD ("the Final Draft Site Allocations Plan") will replace the adopted Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD when adopted (anticipated in 2021).

### National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF was revised in July 2018 and February 2019, implementing reforms announced previously through the Housing White Paper, the "Planning for the Right Homes in the Right Places" consultation and the draft revised NPPF consultation. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF states in paragraph 35 that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are deemed to be sound if they are; positively prepared, justified, effective and consistent with national policy.
8. The Duty to Cooperate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to cooperate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. Paragraph 25 of the NPPF requires strategic policy-making authorities to collaborate and identify the relevant strategic matters which they need to address in their plans.

Ongoing joint-working is seen as critical to the production of positively prepared and justified strategies and helps to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. To demonstrate this, paragraph 27 of the NPPF states that strategic policy-making authorities should prepare and maintain statements of common ground to document the cross-boundary matters being addressed and progress in cooperating to address these.

9. The NPPF makes clear that plans should apply a presumption in favour of sustainable development, meaning that: plans should positively seek opportunities to meet their development needs; be flexible to adapt to rapid change; and provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The exceptions to this are if assets or areas of particular importance provide a strong reasons for restricting development or any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

#### National Policy Context – Affordable Housing

10. The Government’s declared objective is to ‘significantly boost the supply of homes’ (NPPF paragraph 59) and this requires a sufficient amount and variety of land to be able to come forward where it is needed. The NPPF indicates that local planning authorities should set out through the development plan strategic policies expressing the authority’s priorities for development (paragraph 17). Strategic policies should set out an overall strategy for the pattern, scale and quality of development, including making sufficient provision for housing and affordable housing (paragraph 20).
11. Strategic policies should, where a need for affordable housing is identified, specify the type of affordable housing required, and expect it to be met on site unless:
  - a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
  - b) the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 62).
12. Paragraph 63 clarifies that the provision of affordable housing should not be sought for residential developments that are not major developments<sup>1</sup>. It also supports the proportionate reduction of the amount of affordable housing contribution sought on the re-use of brownfield land.
13. Paragraph 64 states that planning policies should expect at least 10% of homes on major residential developments to be for affordable home ownership<sup>2</sup>, unless this would exceed the level of affordable housing required in the area, or significantly

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<sup>1</sup> For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more (NPPF Glossary)

<sup>2</sup> As part of the overall affordable housing contribution from the site.

prejudice the ability to meet the identified affordable housing needs of specific groups. The exemptions to this are for developments or sites that:

- a) provide solely for Build to Rent homes;
  - b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
  - c) is proposed to be developed by people who wish to build or commission their own homes; or
  - d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.
14. The NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:
- a) affordable housing for rent, which includes social rent and affordable rent;
  - b) Starter homes, which are new build homes for young, first-time buyers (below 40 years) to buy with a minimum 20% discount off the market price;
  - c) Discounted market sales housing, which is sold at a discount of at least 20% below local market value; or
  - d) Other affordable routes to home ownership, including shared ownership, equity loans, other low cost homes for sale, and rent to buy

#### Adopted Local Plan

15. Policy CS12 (Affordable Housing) of the adopted Local Plan (2017) sets the following affordable housing requirement in new developments:
- “The Council will seek to ensure that a choice of homes is available to meet identified affordable housing needs in Ipswich. Outside the Ipswich Garden Suburb, this will be achieved by requiring new developments of 15 dwellings or more (or on sites of 0.5ha or more) to provide for at least 15% on-site affordable housing by number of dwellings. At least 80% of affordable housing provision shall consist of affordable rented homes or homes for social rent.”*

#### Affordable Housing Completions

16. Monitoring data gathered by the Council in table 1 below demonstrates the levels of overall housing and affordable housing completions in the Borough.

**Table 1: Monitoring Data of Affordable Housing Completions**

|                                 | New Homes | Affordable Homes |      |
|---------------------------------|-----------|------------------|------|
|                                 |           |                  | %    |
| 2001 - 2002                     | 347       | 31               | 9    |
| 2002 - 2003                     | 468       | 157              | 34   |
| 2003 - 2004                     | 566       | 107              | 19   |
| 2004 - 2005                     | 717       | 102              | 14   |
| 2005 - 2006                     | 782       | 156              | 20   |
| 2006 - 2007                     | 985       | 163              | 17   |
| 2007 - 2008                     | 1,413     | 329              | 23   |
| 2008 - 2009                     | 899       | 245              | 27   |
| 2009 - 2010                     | 389       | 26               | 7    |
| 2010 - 2011                     | 337       | 135              | 40   |
| 2011 - 2012                     | 283       | 152              | 54   |
| 2012 - 2013                     | 100       | 7                | 7    |
| 2013 - 2014                     | 228       | 44               | 19.3 |
| 2014 - 2015                     | 470       | 202              | 43.0 |
| 2015 - 2016                     | 496       | 133              | 26.8 |
| 2016 - 2017                     | 256       | 4                | 1.6  |
| 2017 - 2018                     | 141       | 20               | 14.2 |
| 2018 – 2019                     | 223       | 9                | 4.1  |
| including Assisted Living units |           |                  |      |

17. As shown above, affordable housing completions for the past three monitoring years have been relatively low compared to previous years. This suggests that the deliverability of affordable housing through recent developments has been unable to meet the need identified by the adopted policy. The table shows a ten-year average provision of affordable housing of 25% of all completions 2009-2019 and a five-year average of 23% since 2014, but year on year completions vary according to the nature of the developments taking place. This is controlled through the market and, in many developer-led schemes, is affected adversely by viability issues.

#### Evidence of need for affordable housing

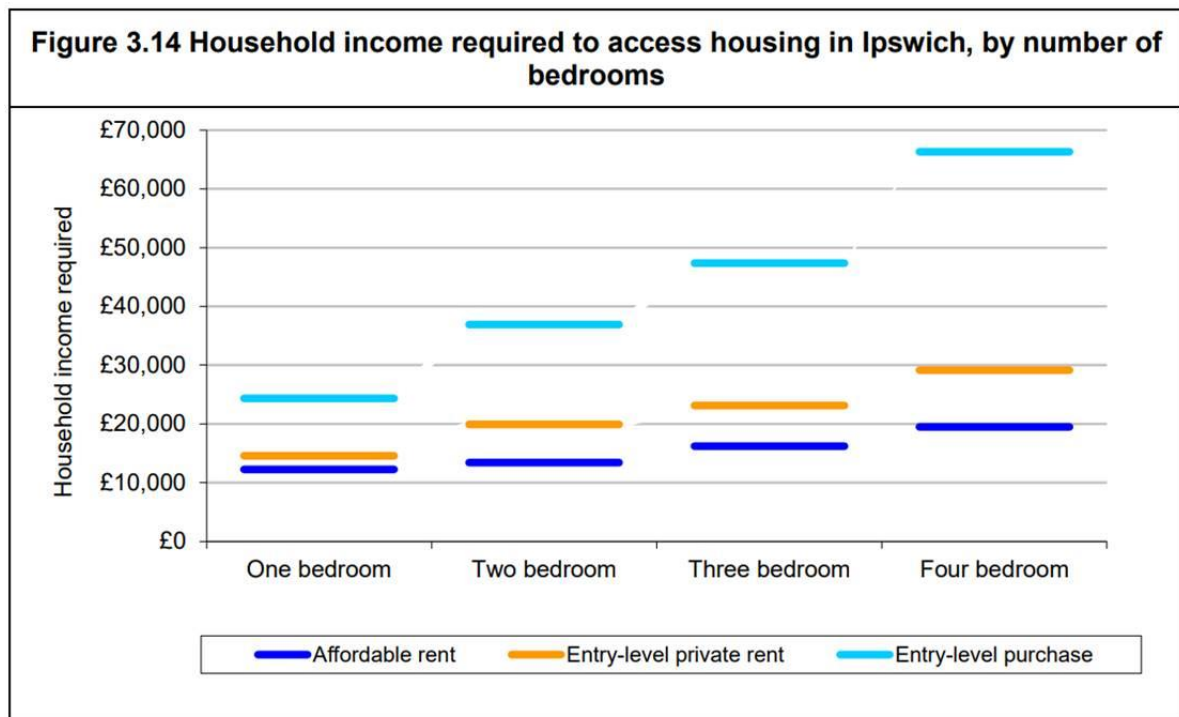
18. In the context of the Ipswich Housing Market Area (IHMA) as a whole, the gap between affordable rent and market entry rent is smaller than the gap between market entry rent and entry level home ownership. However, it should be noted that, for Ipswich, the gap between affordable rent and market entry rent is more substantial than the other authorities which make up the IHMA, whilst that between market entry rent and home ownership is smaller:

Table 3.4 – Scale of key housing market gaps – SHMA Volume 2 (2017)

SHMA, Volume 2 – September 2017

| <b>Table 3.4 Scale of key housing market gaps</b> |                                            |                                                 |
|---------------------------------------------------|--------------------------------------------|-------------------------------------------------|
| <b>Babergh</b>                                    |                                            |                                                 |
| <i>Property size</i>                              | <i>Affordable Rent&lt;entry-level rent</i> | <i>Entry-level rent&lt;entry-level purchase</i> |
| One bedroom                                       | 24.3%                                      | 85.5%                                           |
| Two bedrooms                                      | 32.7%                                      | 134.0%                                          |
| Three bedrooms                                    | 35.4%                                      | 163.5%                                          |
| Four bedrooms                                     | 35.8%                                      | 204.2%                                          |
| <b>Ipswich</b>                                    |                                            |                                                 |
| <i>Property size</i>                              | <i>Affordable Rent&lt;entry-level rent</i> | <i>Entry-level rent&lt;entry-level purchase</i> |
| One bedroom                                       | 19.1%                                      | 67.3%                                           |
| Two bedrooms                                      | 48.3%                                      | 85.7%                                           |
| Three bedrooms                                    | 42.6%                                      | 104.6%                                          |
| Four bedrooms                                     | 49.5%                                      | 127.5%                                          |
| <b>Mid Suffolk</b>                                |                                            |                                                 |
| <i>Property size</i>                              | <i>Affordable Rent&lt;entry-level rent</i> | <i>Entry-level rent&lt;entry-level purchase</i> |
| One bedroom                                       | 39.9%                                      | 79.6%                                           |
| Two bedrooms                                      | 29.4%                                      | 125.3%                                          |
| Three bedrooms                                    | 32.5%                                      | 163.2%                                          |
| Four bedrooms*                                    | 48.2%                                      | 188.9%                                          |
| <b>Suffolk Coastal</b>                            |                                            |                                                 |
| <i>Property size</i>                              | <i>Affordable Rent&lt;entry-level rent</i> | <i>Entry-level rent&lt;entry-level purchase</i> |
| One bedroom                                       | 26.8%                                      | 94.0%                                           |
| Two bedrooms                                      | 31.3%                                      | 143.8%                                          |
| Three bedrooms                                    | 32.5%                                      | 183.2%                                          |
| Four bedrooms                                     | 23.5%                                      | 243.6%                                          |

Figure 3.14 – Household income required to access housing – SHMA Volume 2 (2017)



Source: Online survey of property prices September 2016; HCA's Statistical Data Return 2015, Council LAHS 2015

19. SHMA Tables 4.2 and 4.3 below using the data collected in the SHMA identify that the social rent profile projected for 2036 is noticeably greater as a proportional percentage for Ipswich than the other IHMA authorities:

| <b>Table 4.2</b> | Social Rent/ Affordable Rent Tenure 2018 |            | Projected social rent/ affordable tenure 2036 |             |
|------------------|------------------------------------------|------------|-----------------------------------------------|-------------|
|                  | Number                                   | Percentage | Number                                        | Percentage  |
| Babergh          | 5241                                     | 13.2       | 6225                                          | 13.2        |
| <b>Ipswich</b>   | <b>12648</b>                             | <b>21</b>  | <b>14226</b>                                  | <b>20.9</b> |
| Mid Suffolk      | 4,790                                    | 11         | 6078                                          | 11.3        |
| Suffolk Coastal  | 6542                                     | 11.6       | 7413                                          | 11.4        |



| <b>Table 4.3</b> | Current social rent profile | Social Rent Profile 2036 | Change Required | % of change required |
|------------------|-----------------------------|--------------------------|-----------------|----------------------|
| Babergh          | 5241                        | 6225                     | 984             | 13.3                 |
| <b>Ipswich</b>   | <b>12648</b>                | <b>14226</b>             | <b>1578</b>     | <b>20.5</b>          |
| Mid Suffolk      | 4790                        | 6078                     | 1288            | 12.7                 |
| Suffolk Coastal  | 6542                        | 7413                     | 871             | 10.2                 |

20. The gaps for four-bedroom accommodation are particularly large. The notable gap recorded between affordable rents and market entry rents for most dwelling sizes indicates that intermediate housing (which includes rent) could potentially be useful for a large number of households.
21. Ipswich Borough Council continues to progress a programme of affordable house building across over 20 sites in the Borough and has an aspiration to develop 1,000 new homes in ten years. Moreover, the Council is also investing a further £11 million in improving its existing housing stock.
22. For example, Handford Homes (a development company set up by Ipswich Borough Council) has recently completed 17 affordable dwellings at 79 Cauldwell Hall Road (17/01115/VC) and has made substantial progress on the development of the former Toaks Bakery site, which when completed, will provide 41 affordable dwellings. In addition, Handford Homes has submitted planning applications on six small sites in the Borough, which would provide a further 40 new houses. The Council also has control over other sites (notably at Ravenswood UVW Ref. IP150a, and Bibb Way Ref. IP279) which are allocated for 94 and 104 dwellings respectively) that will deliver within the plan period.
23. In May 2019, Ipswich Borough Council's housing stock totalled 7794. 555 of these were sheltered stock and the remaining 7239 were general needs stock<sup>3</sup>).

### Final Draft Local Plan Approach

#### Calculating the Affordable Housing Need

24. The Ipswich Strategic Housing Market Assessment (SHMA) 2017 Part 2 Report (as updated January 2019) tested the impact of calculating housing need by using the Government's standard method and the 2014-based household projections and

<sup>3</sup> [https://www.ipswich.gov.uk/sites/default/files/finalhousing\\_strategy\\_-\\_2019\\_-\\_2024.pdf](https://www.ipswich.gov.uk/sites/default/files/finalhousing_strategy_-_2019_-_2024.pdf)

identified that the total annual affordable housing need in Ipswich is 239 households per year, which represents 47.9% of the annual projected household growth in the Borough between 2014 and 2036 identified through the SHMA and over 50% of the need identified using the standard method.

25. The SHMA Part 1 Report May 2017 (updated August 2017) is clear that the calculation of affordable housing need is separate from the objectively assessed need (OAN) (now calculated using the Government's standard method) and is based on a different methodology. At paragraph 7.19 ii. it states that:

'The OAN measures the total number of additional homes to be provided over the plan period. In contrast, affordable need only assesses the additional homes to be provided in affordable tenures, without consideration of other tenures (or that market homes will become available for reuse as their occupants move to affordable housing). If affordable need were met in full, then much of the growth in affordable housing would be matched by reduced need for market housing, as many people would shift from unsuitable market housing to suitable affordable housing.'

26. It goes on to confirm that affordable housing need is a different kind of need from the Objectively Assessed Need now calculated using the standard method. Therefore, the Local Plan is not required to meet the affordable need in full and this has been confirmed by inspectors' decisions and legal judgements.

27. The total affordable housing need figure for Ipswich referenced in paragraph 24 above represents an unconstrained estimate of the amount of affordable housing required. It is only used to indicate whether consideration should be given to increasing the housing requirement, as advised by the revised Planning Practice Guidance (PPG) 2019:

'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.' (PPG, paragraph: 024 Reference ID: 2a-024-20190220 Revision date: 20 02 2019).

28. The Inspector of the Stroud Local Plan wrote in his report:

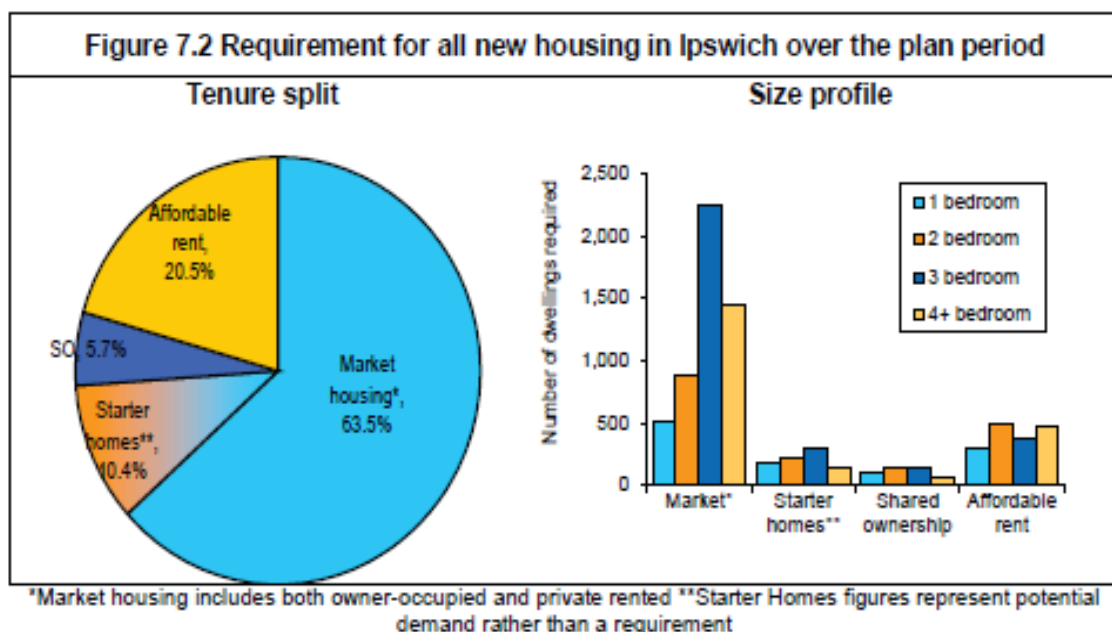
'... to seek to deliver all the affordable housing needed through the provision of market housing would result in unrealistic and undeliverable rates of housing development.' (Para 48, Report to Stroud District Council by Stephen J Pratt BA (Hons) MRTPI, 2nd November 2015.)

29. The question of uplift to the Final Draft Local Plan housing requirement has been addressed through the Ipswich Borough Council topic paper, 'Reviewing the Ipswich Housing Figure.' The 2019 update to the Part 2 SHMA report explains through

paragraph 1.3 that the affordable need as calculated through the 2017 Part 2 SHMA report and reported above remains suitable and robust.

30. The SHMA indicates that the mix of housing that would best address the needs of the local population would be an overall requirement for 20.5% of new homes to be affordable housing for rent (including social rent) and 16.1% affordable home ownership (including Shared Ownership and Starter Homes). Thus, affordable housing need represents approximately 36% of overall housing need. Affordable rent represents the larger portion of affordable housing need, which is relevant in relation to paragraph 64 of the NPPF.

Figure 1 – Tenure Split required to meet housing need in Ipswich – Figure 7.2 from the SHMA Part 2 Report, January 2019 Update (2014-based figures)



31. The SHMA Part 2 Report 2017 states that, when setting an affordable housing target in the Plan, the Council will need to consider the full range of evidence (including the viability assessment) and allowance will need to be taken of the fact that some sites may not deliver affordable housing (for example due to policy thresholds) (paragraph 7.14).
32. In setting the appropriate affordable housing requirement for the plan, the Council has taken into account the funding available to help provide subsidised housing and the viability of delivery in Ipswich. The Ipswich Whole Plan Viability Report indicates that for most types of site (greenfield or brownfield and large or small), at least 15% affordable housing provision is a realistic and deliverable requirement other than in wholly or mainly flatted developments in the lower value area (where it would not be viable). Expressing the requirement as a minimum reflects the level of need in Ipswich and provides a starting point for negotiation where development values may support higher provision.

33. Therefore, the proposed approach to affordable housing through policy CS12 of the emerging Local Plan remains the same as in the adopted Local Plan at 15% of all the homes on the site.
34. For the strategic sites allocated through Core Strategy policies ISPA4 (land at the northern end of Humber Doucy Lane) and CS10 (Ipswich Garden Suburb), the affordable housing requirement is set out within the relevant policy.

#### Setting the Threshold

35. Paragraph 63 of the NPPF dictates that affordable housing should not be sought for residential developments that are not major developments (9 or fewer dwellings). This means that the minimum threshold for requiring affordable housing in residential developments that can be sought is 10 dwellings.
36. The adopted Local Plan policy CS12 set a threshold of 15 dwellings or more as the starting point for when affordable housing is required in new residential developments. This was on the basis of the Whole Plan Viability Assessment (undertaken in December 2014) for the 2017 Local Plan Review which identified that development viability at the time was challenging.
37. The Council has undertaken a further Whole Plan Viability Assessment to inform the emerging Local Plan. The position remains one whereby development viability in the Borough is difficult, particularly in the lower value brownfield areas where the majority of the Borough's site allocations are located.
38. The Whole Plan Viability Assessment also specifically tested a lower threshold for the starting point in the lower value area of 12 dwellings. This was to test whether there was any scope to bring down the starting point for affordable housing under the emerging Local Plan. However, the results for this (see appendix 1 of the Whole Plan Viability Assessment) clearly demonstrate that this is not a viable option.
39. Consequently, it is appropriate that the proposed approach through policy CS12 of the emerging Local Plan remains the same as in the adopted Local Plan, whereby the starting point for requiring affordable housing in new developments is set at a minimum of 15 dwellings.

#### Determining the Tenure Mix

40. Paragraph 64 of the NPPF states that at least 10% of homes should be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. It then sets a number of exceptions. Paragraph 61 of the NPPF indicates that different groups can include those who require affordable housing.

41. The SHMA Part 2 Report (2017 and 2019) demonstrates that the affordable housing need in Ipswich is primarily for affordable housing for rent (Figure 7.2).
42. The soundness tests for the Local Plan as set out in the NPPF are as follows: positively prepared; justified; effective and consistent with national policy. To be sound, where a local policy departs from national policy, there should be a strong local justification.
43. If the Council was to follow the NPPF requirement regarding 10% affordable home ownership in all major developments, (which would form the bulk of the 15% affordable housing policy requirement) only 5% of all the housing delivered on private sites would be for affordable rent. This is clearly contrary to the identified need in the Borough.
44. Under these circumstances, there is a strong local justification to divert away from the 10% affordable home ownership requirement in the NPPF on the grounds that it passes the justified test of soundness, and in certain schemes would meet the exemption set out in the NPPF through the Borough providing solely 'affordable rent' homes (para 64a), or developments exclusively for affordable housing (para 64d) through its council house programme.
45. Therefore, the policy approach proposed is that, in accordance with the SHMA (2019) 60% of the affordable housing provision should comprise affordable housing for rent (including social and affordable rent) and 40% of the affordable housing provision should comprise starter homes, discounted market sales housing and other affordable routes to home ownership, such as shared ownership.

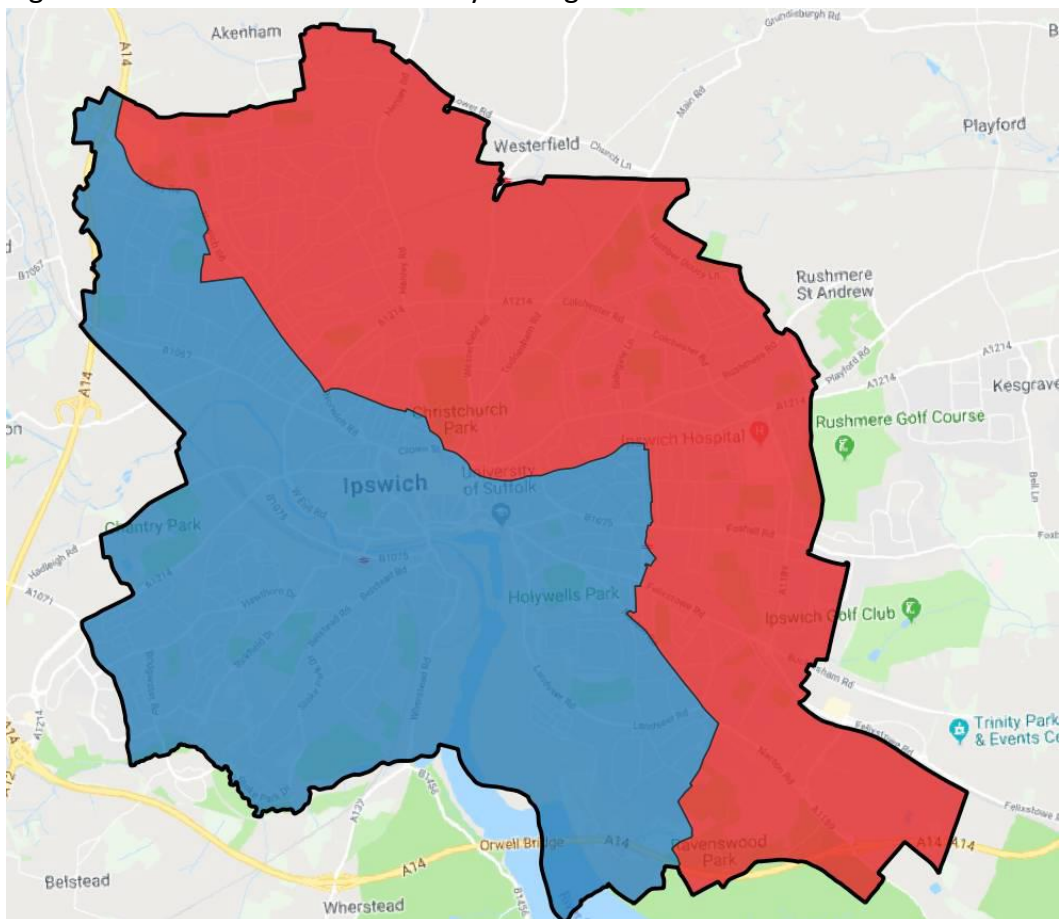
#### How will affordable housing need in Ipswich be met?

46. The SHMA Part 2 Report Update January 2019 recommends that the best way to meet affordable housing need in Ipswich would be to for 20.5% of the total housing provision to be provided as affordable rented homes and 16.1% as affordable home ownership homes. The SHMA Part 2 Report 2017 is also clear that viability should inform the Local Plan approach to affordable housing (paragraph 7.14).
47. The Final Draft Local Plan sets out differing policy requirements for affordable housing, reflecting the whole plan viability evidence which shows what is deliverable geographically across the Borough, taking into account policy costs and land values. Table 2 below sets out the variable affordable housing requirements enshrined in the Final Draft Local Plan policies. Figure 2 illustrates the value zones used in the Whole Plan Viability Assessment January 2020 (Figure 5.3) for viability testing. This clearly demonstrates that a high proportion of Ipswich generally lies in a 'cold zone' where land values and house prices are generally low.

Table 2 Affordable Housing Policies in the Final Draft Local Plan

| Policy | Site                                                                                                   | Affordable Housing Requirement                                                                                                                                                                 |
|--------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ISPA4  | Land at the northern end of Humber Doucy Lane                                                          | 30% affordable housing, which aligns with the portion of the site within the former Suffolk Coastal area of East Suffolk and closely reflects the approach to the nearby Ipswich Garden Suburb |
| CS10   | Ipswich Garden Suburb (IGS)                                                                            | The overall requirement across all the sites and the plan period is 31%                                                                                                                        |
| CS12   | All other sites – allocations (policy SP2) and windfall sites (CS7) where they meet the size criterion | 15%                                                                                                                                                                                            |

Figure 2 Value zones used in viability testing



Legend

- Lower value
- Higher value

48. In order to estimate the contribution that the Local Plan will make to meeting the Ipswich affordable housing need identified through the SHMA, a trajectory calculation has been made to illustrate the potential supply through development sites, based on the policy percentages outlined in Table 2.
49. The main residential allocation policies are ISPA4 for land at the northern end of Humber Doucy Lane, CS10 for Ipswich Garden Suburb and SP2 for the remaining allocations, both greenfield and brownfield. Land at the northern end of Humber Doucy Lane and Ipswich Garden Suburb are listed individually in the figures to reflect their specific policy approach. The SP2 allocations include greenfield and brownfield sites across the whole Borough with a range of densities according with the density approach set out through Final Draft Local Plan policies CS2 and DM23.
50. The Whole Plan Viability Assessment January 2020 identified that some sites would not be viable with affordable housing provision. A key determinant is whether the site capacity is based on a housing-led development – typically densities of fewer than 70 dwellings per hectare – or on an apartment-led development where the density would be higher. This broadly applies to both brownfield and greenfield sites across both value areas. Therefore, the only SP2 allocations for which affordable housing provision has been assumed are those which would fall within the housing-led category. See Table 3 below.

Table 3 – Housing-led brownfield sites allocated through policy SP2

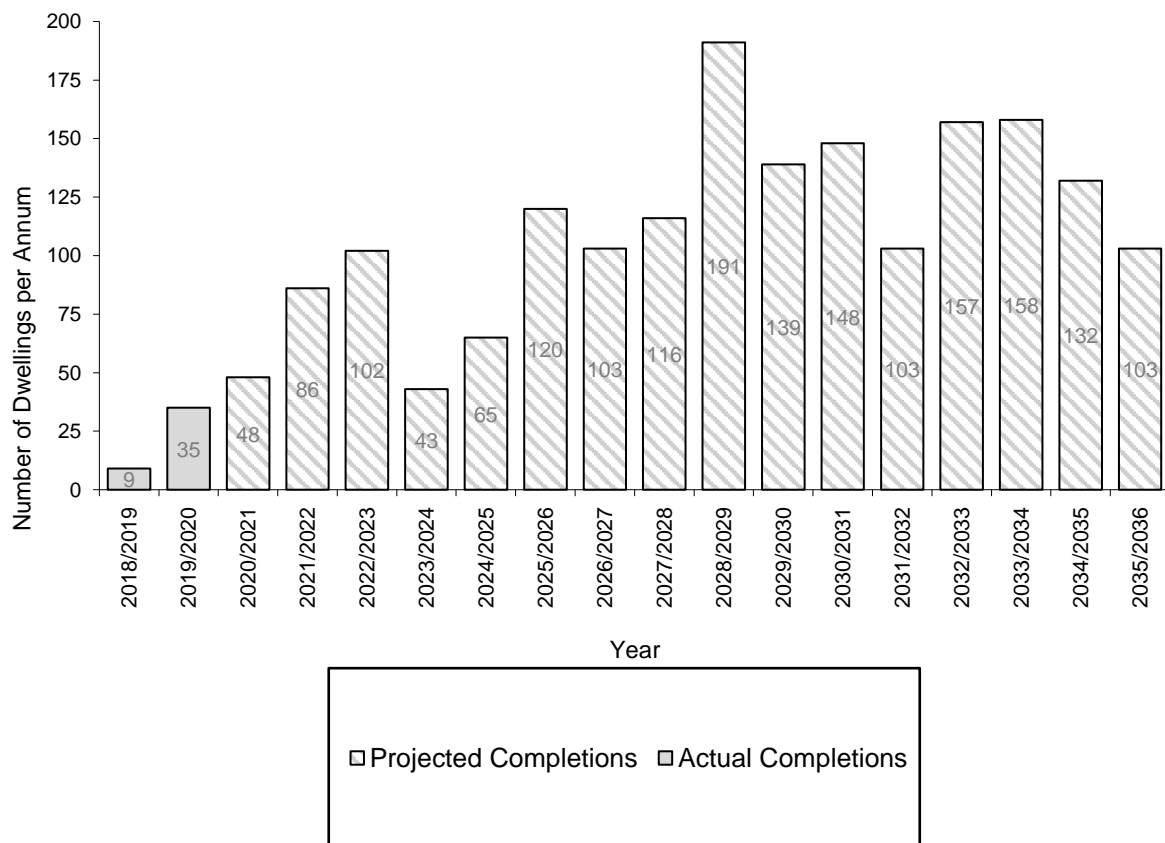
| SITEREf/ Code | Address                                               | Policy | Value Zone | Flat Led (65%+) (high net density 71dph+) | Gross Site Area | Net Site Area | Capacity (dwellings) | Gross Density (DPH) | Net Density | Percentage residential | Greenfield / brownfield | Percentage Resi |
|---------------|-------------------------------------------------------|--------|------------|-------------------------------------------|-----------------|---------------|----------------------|---------------------|-------------|------------------------|-------------------------|-----------------|
| IP009         | Victoria Nurseries, Westerfield Road                  | SP2    | Higher     | No                                        | 0.39            | 0.39          | 12                   | 31                  | 31          | 100                    | Brownfield              | 1.00            |
| IP010a        | Co-op Depot, Felixstowe Road                          | SP2    | Higher     | No                                        | 2.22            | 1.67          | 75                   | 34                  | 45          | 75                     | Brownfield              | 0.75            |
| IP010b        | Felixstowe Road                                       | SP2    | Higher     | No                                        | 2.79            | 1.40          | 62                   | 22                  | 44          | 50                     | Brownfield              | 0.50            |
| IP031a        | Car Park, Burrell Road                                | SP2    | Lower      | No                                        | 0.44            | 0.44          | 20                   | 45                  | 45          | 100                    | Brownfield              | 1.00            |
| IP047         | Land at Commercial Road                               | SP2    | Lower      | No                                        | 3.11            | 2.49          | 173                  | 56                  | 70          | 80                     | Brownfield              | 0.80            |
| IP054b        | Land between Old Cattle Market and Star Lane          | SP2    | Lower      | No                                        | 1.08            | 0.65          | 40                   | 37                  | 62          | 60                     | Brownfield              | 0.60            |
| IP064a        | Land between Holywells Road and Holywells Park        | SP2    | Lower      | No                                        | 1.20            | 1.20          | 66                   | 55                  | 55          | 100                    | Brownfield              | 1.00            |
| IP066         | JJ Wilson and land to rear, Cavendish Street          | SP2    | Lower      | No                                        | 0.85            | 0.85          | 55                   | 65                  | 65          | 100                    | Brownfield              | 1.00            |
| IP067a        | Former British Energy Site (north), Cliff Quay        | SP2    | Lower      | No                                        | 0.38            | 0.38          | 17                   | 45                  | 45          | 100                    | Brownfield              | 1.00            |
| IP080         | 240 Wherstead Road                                    | SP2    | Lower      | No                                        | 0.49            | 0.49          | 27                   | 55                  | 55          | 100                    | Brownfield              | 1.00            |
| IP105         | Depot, Beaconsfield Road                              | SP2    | Lower      | No                                        | 0.33            | 0.33          | 15                   | 45                  | 45          | 100                    | Brownfield              | 1.00            |
| IP125         | Corner of Hawke Road and Holbrook Road                | SP2    | Lower      | No                                        | 0.25            | 0.25          | 15                   | 60                  | 60          | 100                    | Brownfield              | 1.00            |
| IP143         | Former Norsk Hydro, Sandy Hill Lane                   | SP2    | Lower      | No                                        | 4.51            | 4.51          | 85                   | 19                  | 19          | 100                    | Brownfield              | 1.00            |
| IP150d        | Land south of Ravenswood (west - Sports Park)         | SP2    | Higher     | No                                        | 1.80            | 1.80          | 34                   | 19                  | 19          | 100                    | Brownfield              | 1.00            |
| IP150e        | Land south of Ravenswood (east)                       | SP2    | Higher     | No                                        | 3.60            | 3.60          | 126                  | 35                  | 35          | 100                    | Brownfield              | 1.00            |
| IP221         | Waterford Road                                        | SP2    | Lower      | No                                        | 0.35            | 0.18          | 12                   | 34                  | 69          | 50                     | Brownfield              | 0.50            |
| IP279B(1)     | Land north of Former British Telecom Office, Bibb Way | SP2    | Lower      | No                                        | 0.44            | 0.44          | 18                   | 41                  | 41          | 100                    | Brownfield              | 1.00            |
| IP279B(2)     | Land south of Former British Telecom Office, Bibb Way | SP2    | Lower      | No                                        | 0.61            | 0.61          | 29                   | 48                  | 48          | 100                    | Brownfield              | 1.00            |
| IP307         | Prince of Wales Drive                                 | SP2    | Lower      | No                                        | 0.27            | 0.27          | 12                   | 44                  | 44          | 100                    | Brownfield              | 1.00            |
| IP309         | Former Bridgeward Social Club, 68A Austin Street      | SP2    | Lower      | No                                        | 0.28            | 0.28          | 15                   | 54                  | 54          | 100                    | Brownfield              | 1.00            |
| <b>TOTAL</b>  |                                                       |        |            |                                           |                 |               | <b>908</b>           |                     |             |                        |                         |                 |

51. Some of the sites are in the Council’s ownership. Ipswich Borough Council’s Corporate Plan, ‘Building a Better Ipswich’, (2017), sets out the aim to deliver one thousand new homes through direct provision (new build) within ten years. It also points to 137 completions already achieved at that date. On the smaller Ipswich Borough Council sites, affordable housing is assumed to form 100% of the provision. However, on larger sites, a lower affordable housing percentage is the usual assumption to ensure mixed and balanced communities are created.
52. Finally, a small allowance is made in the figures for large windfall sites which have potential to deliver an affordable housing element. The trend data for windfall on sites of more than ten dwellings shows an average of 50 dwellings per year. Projecting this forward for 13 years for the purposes of the calculation, it has been assumed that half may deliver affordable housing at 15% in line with the Local Plan assumption, yielding 49 affordable dwellings.

#### Affordable Housing Trajectory

53. Figure 3 below shows the potential for affordable housing delivery over the plan period. This is an estimate based on an assumption of full, policy compliant provision on the sites included, in accordance with the Whole Plan Viability Report.

**Figure 3 Affordable Housing Trajectory 1st April 2020: Completions since 2018 and projections to 2036**





54. The detailed trajectory which sits behind this graph is shown below.

Ipswich Borough Council Affordable Housing Trajectory (as at April 2020) DRAFT

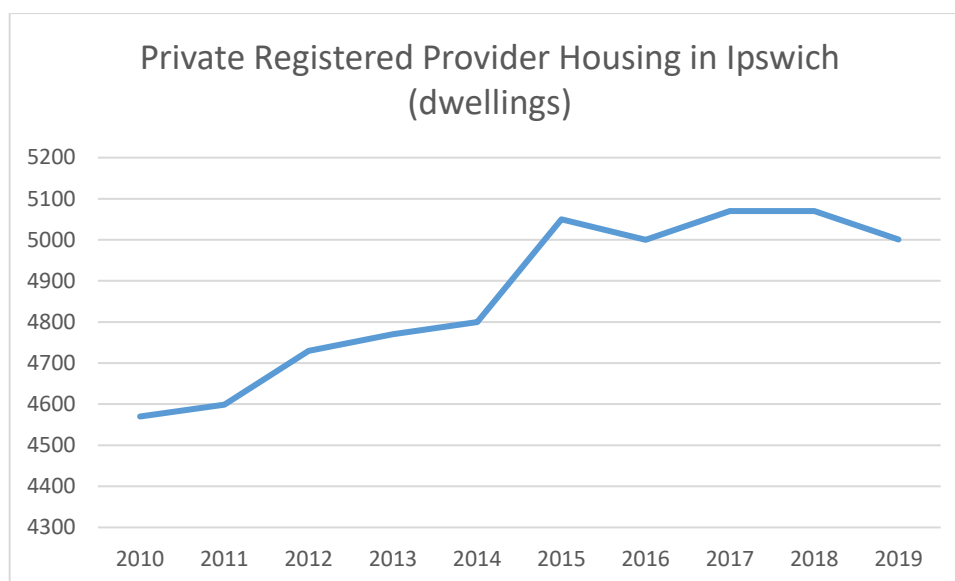
| Site Reference | Planning application reference | Status (Allocation, Outline, Reserved Matters, Full, Prior Approval) | Name and address of site                                         | Greenfield/Brownfield | No. residual expected to be completed in 5 years (formula field) | Current Yr 1      | Yr 2           | Yr 3           | Yr 4           | Yr 5           | Yr 6           | Yr 7           | Yr 8           | Yr 9           | Yr 10          | Yr 11           | Yr 12           | Yr 13           | Yr 14           | Yr 15           | Total Identified Supply (formula field) |
|----------------|--------------------------------|----------------------------------------------------------------------|------------------------------------------------------------------|-----------------------|------------------------------------------------------------------|-------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------------------------------|
|                |                                |                                                                      |                                                                  |                       |                                                                  | 2020/21 (Current) | 2021/22 (Yr 1) | 2022/23 (Yr 2) | 2023/24 (Yr 3) | 2024/25 (Yr 4) | 2025/26 (Yr 5) | 2026/27 (Yr 6) | 2027/28 (Yr 7) | 2028/29 (Yr 8) | 2029/30 (Yr 9) | 2030/31 (Yr 10) | 2031/32 (Yr 11) | 2032/33 (Yr 12) | 2033/34 (Yr 13) | 2034/35 (Yr 14) |                                         |
| IP005          | 16/00969                       | Full - approved (SP3)                                                | Former Tooks Bakery 731, Old Norwich Road                        | Brownfield            | 0                                                                | 41                |                |                |                |                |                |                |                |                |                |                 |                 |                 |                 |                 | 41                                      |
| IP009          | UC009                          | Allocation (SP2)                                                     | Victoria Nurseries, 1 Kettlebaston Way IP4 2XX                   | Brownfield            | 0                                                                |                   |                |                |                |                | 2              |                |                |                |                |                 |                 |                 |                 |                 | 2                                       |
| IP010a         | UC010 part a                   | Allocation (SP2)                                                     | Former Co-op Depot, Derby Road & Hines Road                      | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                | 6              | 5              |                 |                 |                 |                 |                 | 11                                      |
| IP010b         | UC010 part b                   | Allocation (SP2)                                                     | Felixstowe Road (237 to 297)                                     | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                |                | 9              |                 |                 |                 |                 |                 | 9                                       |
| IP014          |                                | Allocation (SP2)                                                     | 92 - 94 and Hope Church, 114 Fore Hamlet IP3 8AF                 | Brownfield            | 31                                                               |                   |                |                |                | 31             |                |                |                |                |                |                 |                 |                 |                 |                 | 31                                      |
| IP031a         | UC032                          | Allocation (SP2)                                                     | Car Park, Burrell Road                                           | Brownfield            | 0                                                                |                   |                |                |                |                |                |                | 3              |                |                |                 |                 |                 |                 |                 | 3                                       |
| IP032          | UC033                          | Allocation (SP2)                                                     | King George V Field, Old Norwich Rd                              | Greenfield            | 0                                                                |                   |                |                |                |                |                |                |                |                |                | 7               | 8               |                 |                 |                 | 15                                      |
| IP033          | UC034                          | Allocation (SP2)                                                     | Land at Bramford Road (Stocks site)                              | Greenfield            | 0                                                                |                   |                |                |                |                |                |                | 8              |                |                |                 |                 |                 |                 |                 | 8                                       |
| IP047          | 08/00953                       | Allocation (SP2)                                                     | Land at Commercial Road 19/00148 pending outline for up to 173   | Brownfield            | 26                                                               |                   |                |                | 13             | 13             |                |                |                |                |                |                 |                 |                 |                 |                 | 26                                      |
| IP054b         |                                | Allocation (SP2)                                                     | Land between Old Cattle Market and Star Lane                     | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                |                | 6              |                 |                 |                 |                 |                 | 6                                       |
| IP061          | UC064                          | Allocation (SP2)                                                     | School Site, Lavenham Road                                       | Greenfield            | 0                                                                |                   |                |                |                |                | 3              |                |                |                |                |                 |                 |                 |                 |                 | 3                                       |
| IP064a         |                                | Allocation (SP2)                                                     | Holywells Road east                                              | Brownfield            | 0                                                                |                   |                |                |                |                |                |                | 10             |                |                |                 |                 |                 |                 |                 | 10                                      |
| IP066          | UC069                          | Allocation (SP2)                                                     | JJ Wilson, White Elm Street and land to rear at Cavendish Street | Brownfield            | 0                                                                |                   |                |                |                |                | 8              |                |                |                |                |                 |                 |                 |                 |                 | 8                                       |
| IP067a         |                                | Allocation (SP2)                                                     | Former British Energy site (north)                               | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                |                |                |                 |                 | 3               |                 |                 | 3                                       |
| IP080          | UC085                          | Allocation (SP2)                                                     | 240 Wherstead Road                                               | Brownfield            | 0                                                                |                   |                |                |                |                | 4              |                |                |                |                |                 |                 |                 |                 |                 | 4                                       |
| IP105          | UC129                          | Allocation (SP2)                                                     | Depot, Beaconsfield Road                                         | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                | 2              |                |                 |                 |                 |                 |                 | 2                                       |
| IP116b         | 16/00677                       | Reserved Matters - approved (SP3)                                    | St Clements Hospital Grounds, Foxhall Road                       | Greenfield            | 0                                                                | 3                 |                |                |                |                |                |                |                |                |                |                 |                 |                 |                 |                 | 3                                       |
|                |                                |                                                                      |                                                                  | Brownfield            | 0                                                                |                   |                |                |                |                |                |                |                |                |                |                 |                 |                 |                 |                 | 0                                       |
| IP125          |                                | Allocation (SP2)                                                     | Corner of Hawke Road and Holbrook Road                           | Brownfield            | 20                                                               |                   |                |                | 20             |                |                |                |                |                |                |                 |                 |                 |                 |                 | 20                                      |

| Site Reference | Planning application reference | Status (Allocation, Outline, Reserved Matters, Full, Prior Approval) | Name and address of site                                                                      | Greenfield/Brownfield | No. residual expected to be completed in 5 years (formula field) | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033/34 | 2034/35 | 2035/36 | Total Identified Supply (formula field) |
|----------------|--------------------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------------|------------------------------------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-----------------------------------------|
| IP143          | 17/00769                       | Allocation (SP2) (Outline - approved)                                | Former Norsk Hydro Ltd, Sandyhill Lane                                                        | Brownfield            | 13                                                               |         |         |         |         | 13      |         |         |         |         |         |         |         |         |         |         |         | 13                                      |
| IP150a (part)  | 07/00765 part                  | Outline - approved (SP3)                                             | Land south of Ravenswood (sites U, V and W)                                                   | Brownfield            | 69                                                               |         |         |         | 22      | 23      | 24      |         |         |         |         |         |         |         |         |         |         | 69                                      |
| IP150d         |                                | Allocation (SP2)                                                     | Land south of Ravenswood (Sports Park)                                                        | Brownfield            | 0                                                                |         |         |         |         |         |         |         |         | 24      |         |         |         |         |         |         |         | 24                                      |
| IP150e         |                                | Allocation (SP2)                                                     | Land south of Ravenswood                                                                      | Brownfield            | 22                                                               |         |         |         |         |         | 22      | 22      | 22      | 22      |         |         |         |         |         |         |         | 88                                      |
| IP221          | 06/01007                       | Allocation (SP2) (Full - expired)                                    | Flying Horse PH, 4 Waterford Road                                                             | Brownfield            | 0                                                                |         |         |         |         |         |         |         |         |         |         | 2       |         |         |         |         |         | 2                                       |
| IP279a         | 18/00470                       | Prior Approval - approved (SP3)                                      | Former British Telecom, Bibb Way                                                              | Brownfield            | 102                                                              |         | 50      | 52      |         |         |         |         |         |         |         |         |         |         |         |         |         | 102                                     |
| IP279b(1)      |                                | Allocation (SP2)                                                     | North of former British Telecom offices, Bibb Way fronting Handford Road                      | Brownfield            | 18                                                               |         |         | 18      |         |         |         |         |         |         |         |         |         |         |         |         |         | 18                                      |
| IP279b(2)      |                                | Allocation (SP2)                                                     | South of former British Telecom offices, Bibb Way                                             | Brownfield            | 29                                                               |         |         | 29      |         |         |         |         |         |         |         |         |         |         |         |         |         | 29                                      |
| IP307          |                                | Allocation (SP2)                                                     | Prince of Wales Drive                                                                         | Brownfield            | 3                                                                |         |         | 3       |         |         |         |         |         |         |         |         |         |         |         |         |         | 3                                       |
| IP309          |                                | Allocation (SP2)                                                     | Former Bridgeward Social Club, 68a Austin Street and amenity land rear of 18-42 Austin Street | Brownfield            | 2                                                                |         |         |         |         | 2       |         |         |         |         |         |         |         |         |         |         |         | 2                                       |
| New site IP386 | 19/01118                       | Full (S106) IBC                                                      | 28-50 Grimwade Street                                                                         | Brownfield            | 16                                                               |         | 16      |         |         |         |         |         |         |         |         |         |         |         |         |         |         | 16                                      |
| New site IP387 | 19/01119                       | Full pending IBC                                                     | Lockup garages and amenity area adjacent 14 Emmanuel Close                                    | Brownfield            | 6                                                                |         | 6       |         |         |         |         |         |         |         |         |         |         |         |         |         |         | 6                                       |
| New site IP388 | 19/01122                       | Full pending IBC                                                     | Lockup garages rear of 70 to 84 Sheldrake Drive                                               | Brownfield            | 8                                                                |         | 8       |         |         |         |         |         |         |         |         |         |         |         |         |         |         | 8                                       |
| New site IP389 | 19/01129                       | Full approved                                                        | Lockup garages rear of 32 to 40 Mallard Way                                                   | Brownfield            | 6                                                                |         | 6       |         |         |         |         |         |         |         |         |         |         |         |         |         |         | 6                                       |

| Site Reference                 | Planning application reference | Status (Allocation, Outline, Reserved Matters, Full, Prior Approval) | Name and address of site                                                                                | Greenfield/Brownfield | No. residual expected to be completed in 5 years (formula field) | 2020/21   | 2021/22   | 2022/23    | 2023/24   | 2024/25   | 2025/26    | 2026/27    | 2027/28    | 2028/29    | 2029/30    | 2030/31    | 2031/32    | 2032/33    | 2033/34    | 2034/35    | 2035/36    | Total Identified Supply (formula field) |
|--------------------------------|--------------------------------|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------------------------------|-----------|-----------|------------|-----------|-----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|-----------------------------------------|
| IP181                          | 14/00638                       | Strategic Development Site (Outline approved)                        | Ipswich Garden Suburb Phase N1a (CBRE - West of Westerfield Road & south of Railway Line)               | Greenfield            | 5                                                                |           |           |            |           | 5         | 10         | 35         | 35         | 35         | 35         | 30         | 30         | 30         | 8          |            | 253        |                                         |
| IP180 (part)                   | 16/00608                       | Strategic Development Site (Outline approved)                        | Ipswich Garden Suburb Phase N2a (Crest - North of Railway and east of Henley Road) 20/00245/REM pending | Greenfield            | 26                                                               |           |           |            | 10        | 16        | 25         | 30         | 55         | 60         | 55         | 30         | 20         | 20         | 20         |            | 341        |                                         |
| IP182 (part)                   |                                | Strategic Development Site                                           | Ipswich Garden Suburb Phase N3a (Mersea - East of Westerfield Road)                                     | Greenfield            | 5                                                                |           |           |            |           | 5         | 25         | 25         | 30         | 32         | 32         | 32         | 30         | 25         | 25         | 25         | 286        |                                         |
| IP185, part IP182 & part IP180 |                                | Strategic Development Site                                           | Ipswich Garden Suburb Phase N1b (Ipswich School), Phase N3b (Red House Farm) and Phase N2b (Other land) | Greenfield            | 0                                                                |           |           |            |           |           |            |            |            |            |            |            | 35         | 36         | 35         | 35         | 141        |                                         |
| ISPA4.1                        |                                | Allocation (ISPA4)                                                   | Humber Doucy Lane adjacent to Tuddenham Road                                                            | Greenfield            | 0                                                                |           |           |            |           |           |            |            |            |            |            |            | 30         | 40         | 40         | 39         | 149        |                                         |
| Various                        | Various                        |                                                                      | Sites with fewer than 5 dwellings                                                                       | Brownfield            | 0                                                                | 4         |           |            |           |           |            |            |            |            |            |            |            |            |            |            | 4          |                                         |
| Windfall                       |                                |                                                                      | Windfall sites                                                                                          | Brownfield            | 9                                                                |           |           | 1          | 4         | 4         | 4          | 4          | 4          | 4          | 4          | 4          | 4          | 4          | 4          | 4          | 4          | 49                                      |
| <b>Total</b>                   |                                |                                                                      |                                                                                                         |                       | <b>416</b>                                                       | <b>48</b> | <b>86</b> | <b>102</b> | <b>43</b> | <b>65</b> | <b>120</b> | <b>103</b> | <b>116</b> | <b>191</b> | <b>139</b> | <b>148</b> | <b>103</b> | <b>157</b> | <b>158</b> | <b>132</b> | <b>103</b> | <b>1,814</b>                            |

55. The estimated potential, policy compliant supply of affordable homes is 1,814. The Housing Requirement Topic Paper outlines the Final Draft Local Plan total housing requirement of 8010 dwellings 2018-2036 (445 dwellings per year) incorporated into the Final Draft Local Plan at regulation 19 stage. The estimated affordable housing provision averages out at approximately 23% of the total housing requirement (similar to the average provision over the last five years). The SHMA Part 2 Report Update 2019 recommends an affordable housing policy requirement of approximately 36% of the housing requirement, but importantly qualifies this with reference to viability and funding considerations.
56. The supply has the potential to go some considerable way towards meeting the need indicated by the SHMA's recommended 36% of the overall housing requirement.
57. Undoubtedly, the Council's own home building programme, consisting predominantly of affordable homes, is making a significant contribution towards meeting affordable housing need in Ipswich. The Council has established a Housing Company and set up a Local Authority Trading Company, both as vehicles to deliver more new homes.
58. There are other potential sources of affordable homes which may help to increase provision over the plan period. The Council holds a stock of 7,794 dwellings; whilst not a current focus, there may be potential within this stock for reconfiguring to provide additional homes. The Council's Housing Strategy 2019-2024 sets out four priorities to address housing issues in Ipswich: enabling the building of houses of all tenures; improving access to and the quality of existing housing; meeting the housing needs of all communities and meeting the challenges of an ageing population; and the prevention of homelessness and rough sleeping. 'Improving access to existing housing' includes action taken through the Council's Empty Homes Policy, and to improve access to the private rented sector.
59. The Government through Homes England provides a series of funding strategies that can help with the delivery of affordable housing, including affordable housing funding for authorities. The Local Planning Authority is in the early stages of discussions with Homes England regarding sites in Ipswich to help to bring forward affordable housing.
60. Other housing organisations also have a presence in Ipswich, such as Housing Associations. National housing statistics indicate that, at May 2019, 5,001 dwellings in Ipswich were owned by 'Private Registered Providers' (providers of social housing). Figure 4 shows how this provision has changed over the last decade. There is a clear upward trend over this period, even though more recently this shows some levelling.

Figure 4 Dwelling stock in Ipswich owned by Private Registered Providers



61. Changes being consulted upon or that have been made by the Government include permitted development rights, which could enable changes to the existing housing stock to increase provision. They also include changes to grant regimes or incentives, such as the First Homes consultation undertaken earlier in 2020 which could influence the market.

### Conclusion

62. The Council has collated the appropriate evidence to determine the amount of affordable housing that is needed across the Borough throughout the plan period. The mix of housing that would best address the needs of the local population would be an overall requirement for 20.5% of new homes to be affordable housing for rent (including social rent) and 16.1% affordable home ownership (including Shared Ownership and Starter Homes). This equates to an affordable housing need of approximately 36% of overall housing need.
63. However, the viability of development in the Borough has been challenging in recent years which is evident through the limited amounts of affordable housing arising through private development that have been completed in some years. In addition, the Whole Plan Viability Assessment demonstrates that requiring affordable housing levels greater than 15% across much of the Plan area places significant strain on the viability of development, particularly in the lower value brownfield zones. As a result, it is considered that in order to meet the soundness tests set out in the NPPF, the approach to affordable housing should remain as per the adopted Local Plan.

64. The approach does differ slightly from that set out in the NPPF, specifically not including the 10% affordable home ownership requirement (paragraph 64). However, following this approach would be contrary to the identified need for affordable rented properties in the Borough, which the Council also seeks to address through its council house building programme. The NPPF states: 'the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, ...)' (paragraph 61). In assessing the needs of the community, it is apparent from the evidence above that the needs of Ipswich are different from the expectations in the NPPF.
65. The analysis above shows that the Final Draft Local Plan approach to affordable housing, combined with the Council's own home building programme, could provide approximately 1,800 affordable dwellings over the plan period. Any unmet need would, as at present, require solutions for example within the private market. Affordable housing provision is monitored annually through the Authority Monitoring Report which enables supply issues in relation to policy CS12 to be identified.
66. The evidence shows that the approach to affordable housing set out in the Final Draft Local Plan is justified, practical and deliverable in terms of viability, when tested alongside the other policies in the Local Plan. The Local Plan sits alongside a proactive Council building programme which is already delivering affordable homes. In addition to this, the Council is in the early stages of engaging with Homes England regarding site delivery, and also preparing to assist the burden for private developers in arranging to take on the delivery and management of affordable rented properties on their behalf, as a Registered Provider.