

**Ipswich Local Plan Examination
Hearing Statement
Matter 2: Spatial Strategy**

Humber Doucy Lane, Rushmere St Andrew

Prepared on behalf of Bloor Homes

November 2020

Matter 2: Spatial Strategy

Site Name:	Humber Doucy Lane, Rushmere St Andrew
Client Name:	Bloor Homes
Type of Report:	Hearing Statement
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1.0 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Bloor Homes in relation to their site at Humber Doucy Lane, Rushmere St Andrew.
- 1.2 Bloor Homes have previously made representations to the Reg 18 and Reg 19 consultations of the emerging Ipswich Local Plan Review (ILPR) in March 2019 and March 2020 respectively.
- 1.3 In summary, those representations set out various concerns with the Plan that result in it being unsound. Modifications have been suggested to overcome these concerns and make the Plan sound.

2.0 Matter 2: Spatial Strategy

Issue: Whether the spatial strategy of the ILPR has been positively prepared, is justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will enable the delivery of sustainable development in accordance with national policy?

2.1 In relation to question 16, we do not consider that the spatial strategy for the location and nature of development in the ILPR is justified as the most appropriate strategy when considered against reasonable alternatives. As set out in our Reg 19 representations (ID: 26591) and within our Matter 1 Hearing Statement, the Sustainability Appraisal does not provide a comparative score of the reasonable alternatives against the preferred spatial strategy. They cannot, therefore, be accurately compared to identify whether the preferred spatial strategy is the most appropriate, or indeed whether it is an appropriate strategy at all.

2.2 As set out in our Reg 19 representations (ID: 26586) and response to Matter 3, the evidence highlights that the preferred spatial strategy will provide a large number of one and two bedroom flats, far in excess of the number needed, and a low number of three and greater bedroom houses, despite these being the housing needed. The NPPF expressly requires the need for different types of housing to be identified and planned for, stating at paragraph 61:

*“The **size, type** and tenure of housing needed for different groups in the community should be **assessed and reflected in planning policies** (including, but not limited to, those who require **affordable housing, families with children**, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes” (Emphasis added)*

2.3 With other options available that could deliver a greater number of affordable and larger homes, the spatial strategy chosen simply cannot be considered the most appropriate strategy for the sustainable development of Ipswich.

2.4 Families needing larger properties will have limited options of either too small and unsuitable flats, competing for the existing housing stock which tends to increase prices, or moving out of the area.

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- 2.5 The ILPR has the opportunity to change this and provide families with the homes they need, but the most appropriate strategy must be chosen to deliver this. At the current time, the ILPR sets out highly restrictive housing allocations which fail to address the needs of the community which requires a broader range of housing including, but not limited to, larger family homes and bungalows suitable for older people.
- 2.6 In response to the second part of question 16, one alternative strategy considered by the Council was to deliver homes outside of its administrative boundary. As set out in our Reg 19 representations (ID: 26591), this option was scored unfairly negatively in many regards in the SA, alongside no consideration of how this option could deliver additional affordable housing and family housing.
- 2.7 It is not therefore clear why this option was discounted, other than due to an unclear and inconsistent scoring process within the SA. Indeed, this option has the potential to meet significantly more of the housing and infrastructure needs than the preferred spatial strategy.