

**Ipswich Local Plan Examination  
Hearing Statement  
Matter 3: Housing Provision**

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**Humber Doucy Lane, Rushmere St Andrew**

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Prepared on behalf of Bloor Homes

November 2020

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## Matter 3: Housing Provision

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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 3: Housing Provision

**Question 38. Is the proposal in Policy CS7 (as amended in the Schedule of Proposed Main Modifications) to step the housing requirement from 300 dpa between 01/04/18 and 31/03/24 to 540 dpa between 01/04/24 and 31/03/36 justified, particularly in light of the recent record of under delivery in Ipswich revealed in the Housing Delivery Test 2019 measurement?**

- 2.1 In response to question 38, we do not believe that the proposal in Policy CS7 to step the housing requirement from 300dpa to 540 dpa is justified.
- 2.2 It is pertinent to note that the Council did not publish a housing trajectory at Reg 19 stage, with their response to our previous criticism of this (ID: 26582) being to refer to a Topic Paper published in June 2020, some three months after the end of Reg 19 consultation.
- 2.3 It is therefore somewhat unclear how the Council have justified this approach throughout the Plan making process and have not provided transparency in the process. Furthermore, this has not allowed third parties to review the trajectory and comment accordingly.
- 2.4 The housing trajectory is very reliant on Ipswich Garden Suburb (IGS) from 2021/22 onwards to meet the annual housing target. In 2021/22, projected delivery is only just above the reduced requirement of 300 dpa. With it seeming very optimistic that IGS will deliver as anticipated in 2021/22 given that only one phase has approved outline permission, it appears doubtful that the supply is sufficiently robust.
- 2.5 With the Council acknowledging that there is an undersupply of houses (paragraph 34, Reviewing the Housing Figure) and stating that IGS will remedy this, this further suggests that the Council should be looking at all possible options to increase the delivery of houses in the early part of the Plan period.
- 2.6 As set out in previous representations (ID:26582), Bloor Homes' site at Humber Doucy Lane could deliver approximately 200 homes in the short/medium term, boosting the supply of housing and delivering larger family homes to assist in overcoming the existing undersupply.
- 2.7 The Council have not fully explored all alternative options to seek to boost housing delivery before proposing the stepped trajectory. As a result, it is not justified.

**Question 42. Overall does the Plan allocate sufficient land to ensure the housing requirement of the Borough will be met over the Plan period, in particular from 2031 onwards?**

**Question 46. The Topic Paper on Reviewing Ipswich Housing Figure [D52] calculates the supply of deliverable sites in the Plan is 5.09 years of the annual housing requirement for the first 5 years of the Plan period. Is there a need for and are there any additional sites which could contribute to the first 5 years' supply post adoption should delivery of any of the allocated sites stall in the first 5 years?**

2.8 Overall we consider the Council's land supply is not sufficiently robust. Topic Paper D52 identifies only 5.09 years supply in the early part of the Plan period, which is reliant on IGS starting to deliver a significant number of homes. If any phase of IGS is delayed, this has significant implications for the 5 year housing land supply and delays the building of larger family homes.

2.9 With the Council's failure to deliver sufficient affordable and market housing over the past years (as shown in the Housing Delivery Test results) in terms of the overall number and larger family homes, this emphasises the need for a robust 5 year housing land supply, which has not currently been demonstrated.

2.10 Again we would emphasise that this data was not made available previously, so this is the first opportunity we, and other third parties, have had to review and comment.

**Question 54. Given the evidence on the need for and projected supply of affordable housing, summarised in the Affordable Housing Topic Paper [D53], does the ILPR make sufficient provision for affordable housing to meet needs in the Borough to 2036? If not, how will the need for affordable homes in the Borough be met?**

2.11 In response to question 54, the ILPR does not make sufficient provision for affordable housing to meet the needs to 2036. As set out in our previous representations (ID: 26585), a review of the amount of affordable housing that will be delivered from the allocations, assuming they all deliver an amount compliant with Policy CS12 and that there is no delay or hindrance to the delivery of the allocations themselves, will result in only 1,647 affordable dwellings being provided.

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- 2.12 This equates to 38% of the actual affordable housing need over the Plan period and this is not sufficient.
- 2.13 Whilst there can be constraints on meeting affordable housing need, the Council should have explored all potential options to maximise delivery.
- 2.14 With additional sites available that could provide more affordable homes, the Council have not suitably explored all possible avenues and the ILPR will not achieve a suitable level of delivery. Allocating additional sites and exploring opportunities beyond the administrative boundary would be justified in this regard.

**Question 58. Are the proposed housing allocations in the ILPR likely to deliver the type and mix of homes identified in the SHMA Update report [D16], given the number and proportion of smaller dwellings to be provided at high densities on sites within the IP-One Area and urban area?**

- 2.15 In relation to question 58, the housing allocations will not sufficiently deliver the type and mix of homes needed.
- 2.16 As set out in our previous representations (ID: 26586), the majority of the allocations in the Site Allocations and Policies DPD are high density sites (61%) that will deliver predominantly one and two bedroom flats, contrary to the SHMA setting out that the greatest need for market housing is for homes of at least three bedrooms.
- 2.17 Whilst the IGS and allocation north of Humber Doucy Lane are expected to deliver a broad mix of houses, these cannot meet the existing shortfall in the mix of homes needed and projected demand on their own. The IGS is expected to start delivering imminently, but given the under delivery of larger family houses, this will not be sufficient alone to meet this demand.
- 2.18 The ILPR currently does not allocate sufficient sites to provide the range and mix of housing needed, including larger family homes and bungalows for older people.
- 2.19 As such, the Council should look at other opportunities to rectify this and allocate additional sites to provide larger family homes to meet the existing under supply and future demand. Such sites should be capable of delivering in the early part of the Plan period, such as the site promoted by Bloor Homes.