

Gladman Hearing Statement
Examination of the
Ipswich Local Plan Review 2018-2036

Matter 3: Housing Provision



November 2020

MATTER 3: HOUSING PROVISION

Issue: Has the ILPR been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for housing?

Housing Requirement

35. Should the housing requirement in Policy CS7 be increased to at least 8,280 dwellings or 460 dwellings per annum (dpa), in line with the recent change to the standard method calculation of local housing need (LHN)?
- 1.1 Yes.
36. On what basis does the Council consider, in paragraph 8.106 of the CSP, that it should not plan for a higher level of housing need than the standard method LHN suggests? Given the strategic role of Ipswich in the Ipswich Economic Area, should the Council be planning for a higher figure to provide an uplift to support economic growth?
- 1.2 In determining the housing requirement, consideration needs to be given to matters that influence demographic behaviour and therefore evidence contained in economic growth strategies is of importance.
- 1.3 It is a fundamental element of this Plan, and those of neighbouring authorities such as in the recently adopted Suffolk Coastal Plan in East Suffolk, that the role of Ipswich as county town is fully supported. This will naturally require the need to ensure that sufficient homes are delivered to match the Council's expected levels of job growth over the plan period. The 2017 Strategic Housing Market Assessment (D14) indicates that an additional 838 homes are required above the demographic starting point resulting in a total need of 11,220 homes between 2014-2036 (510 dpa) to align with jobs growth. Between 2014 and 2018 the Council delivered 1,363 new homes, therefore in order to ensure sufficient homes to support expected jobs growth, the Council's evidence points towards a need to deliver at least 9,857 new homes (547 dpa) during the plan period 2018 to 2036.
37. **Has the Council been asked if it can accommodate any unmet housing needs from other LPA areas within the HMA?**
- 1.4 No. Furthermore, it is our view that the housing needs of Ipswich Borough can only be met in full over the plan period through the introduction of a sustainable strategy that includes the allocation of sites beyond its own tightly drawn boundaries in locations that are well related to the Town and its surrounding employment areas.

38. Is the proposal in Policy CS7 (as amended in the Schedule of Proposed Main Modifications) to step the housing requirement from 300dpa between 01/04/18 and 31/03/24 to 540dpa 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?

- 1.5 The objective to significantly boost the supply of homes continues to be a key Government policy¹. It is vital that a sufficient amount and variety of land can come forward where it is needed, and local plans are central to achieving this. Reflecting upon this, it is clear that there is a pressing need to address the historical record of under delivery in Ipswich through the introduction of a strategy within local plans across the Ipswich Strategic Planning Area that enable further land to be brought forward to meet the housing needs of the borough in full. The proposed introduction of the stepped trajectory in its current form exacerbates the long-standing housing delivery issues in the area by placing an over reliance on a small number of sites, including those that have been historically difficult to deliver due to site specific constraints and location within low value areas. The proposed stepped trajectory cannot be justified as being a sustainable approach to meeting the housing needs of the area because it does not provide a sufficient amount or variety of land to meet housing needs over the plan period.
- 1.6 The proposed approach unnecessarily defers the delivery of homes to a later date and places the overall delivery of homes against the housing requirement at significant risk. The housing delivery record (which is set out on page 15 of our representations to the Regulation 19 version of the Local Plan) and the 2019 Housing Delivery Test measurement of 46% should naturally lead to a proactive and positive response through plan making, pursuing an alternative and effective strategy to provide land for housing beyond the borough's boundary in sustainable locations, working under the Duty to Cooperate. The introduction of the stepped trajectory in the form proposed would simply exacerbate the housing delivery issues that are already facing the area and lead to significant shortfalls at the back end of the plan period.
- 1.7 The Planning Practice Guidance identifies specific circumstances where a stepped housing requirement is appropriate for plan-making². This indicates that a stepped housing trajectory may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. It is however necessary for evidence to be provided to support such an approach and to ensure that it does not seek to unnecessarily delay meeting identified development needs. Furthermore, stepped requirements will need to ensure that planned housing requirements are met in full within the plan period. The circumstances in Ipswich are that there has not been a significant change in the level of housing requirement and whilst the strategy does contain strategic allocations, primarily rolled forward from the previous plan, this does not in itself provide justification for the introduction of the stepped trajectory. The proposed strategy has significant implications for the delivery of market and affordable housing through the early and middle years of the plan period and places the ability to meet those needs in full at significant risk. In this regard, the borough boundary places an artificial constraint on the ability of Ipswich to

¹ National Planning Policy Framework, Paragraph 59

² Planning Practice Guidance Paragraph: 21 Reference ID: 68-021-20190722

identify sufficient housing allocations to deliver against housing needs in a continuous and sustainable manner. Critically, the local plan making process provides the ability to overcome this by putting in place a positive strategy to deliver housing in the wider ISPA to contribute towards meeting the housing needs of the borough in full without the unnecessary delay of a stepped trajectory that forecasts lower levels of growth well into the plan period.

Housing Land Supply

- 39. Do the Council's assumptions for a 10% slippage in the delivery of housing from sites with planning permission or with resolutions to grant subject to a S106 agreement make reasonable allowance for the non-implementation of permissions?**
- 1.8 Gladman are concerned that the contingency between the proposed deliverable supply of housing and the assessed housing need is insufficient to ensure that the Borough's needs can be met whilst supporting the maintenance of a deliverable five year housing land supply over the whole plan period.
- 1.9 Whilst welcoming that the Council recognises that the delivery of housing can slip for a variety of reasons, Gladman consider that to enhance the deliverability of the Local Plan, the surplus in supply should be increased to at least 15% of the proposed housing requirement.
- 40. On what basis do Policy CS7 and Table 4 include an allowance for windfall sites in the housing supply of 50dpa between 2022 and 2036? Is there compelling evidence that they will provide a reliable source of supply in accordance with paragraph 70 of the NPPF?**
- 1.10 No comments
- 41. What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; and number of sales outlets?**
- 1.11 The trajectory heavily relies on delivery from the strategic greenfield site, Ipswich Garden Suburb. In total, the Council's 'Reviewing the Ipswich Housing Figure' Topic Paper³ sets out that 3,295 homes will be delivered from the Ipswich Garden Suburb to 2036, with expected delivery peaking between 250 -290 homes per annum in later years in the Plan period.
- 1.12 Setting realistic delivery assumptions, including annual delivery rates and lead-in times for first completions to come forward, is necessary to project the number of homes that the sites identified by the Council can reasonably be expected to deliver both in the five year period and for the entire Plan period.

³ Reviewing the Ipswich Housing Topic Paper, June 2020.

- 1.13 Research undertaken by Lichfield's in their 2020 'Start to Finish' report⁴ suggest that on sites of 2,000 or more dwellings, the average annual delivery rate is 160 homes per annum. Furthermore, the September 2019 Babergh and Mid Suffolk 'Housing Land Supply Position Statement' provided analysis of national evidence on the delivery of housing using research documents and national housebuilder statements to inform average delivery rates nationally. Table 3 of this document details the average national delivery contained within these reports of sites of 500 dwellings or more, suggesting an average annual delivery rate of similar sized sites of approximately 150 dwellings.
- 1.14 This evidence should be used to reprofile the delivery assumptions for the Ipswich Garden Suburb, as highlighted in table 1 below:

Table 1: Comparison of Ipswich Garden Suburb Delivery Assumptions Against National Evidence.

Ipswich Garden Suburb		22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32-36
Housing Figure Topic Paper (June 2020)	CBRE (Fonnereau)		42	84	84	84	84	84	84	84	50	135
	Crest (Henley Gate)	24	90	115	114	96	102	120	120	50	50	99
	Mersea (Westerfield Road)			42	84	84	84	84	84	84	84	210
	Other (Red House)									72	96	288
	Total	24	132	241	282	264	270	288	288	290	280	732
National Evidence	Total	24	132	160	160	160	160	160	160	160	160	480
Difference				-81	-122	-104	-110	-128	-128	-130	-120	-252

- 1.15 Historically Ipswich Borough has not delivered any large sites that are comparable to the scale proposed for the Ipswich Garden Suburb. The Council should therefore base its assumptions on reasonable empirical evidence (such as the national evidence highlighted above) and critique any assumptions that may have been made by the site's developers and promoters. For the Council to meet its own trajectory with regards to the Ipswich Garden Suburb, and the local plan as a whole, the site would need to consistently deliver a level of new homes that is significantly above the average delivery rates identified within reliable evidence of delivery of sites of a similar nature.

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

- 1.16 It is strikingly clear that the Council's assumptions made in respect of the housing trajectory risks the deliverability of the Local Plan and will inevitably lead to further housing land supply problems in the future.

⁴ Lichfield's 'Start to Finish', February 2020.

1.17 Gladman assert that Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. It is evident that to ensure the Borough's housing need can be met that sites, including realistically deliverable strategic sites outside of the Borough's boundary, should be identified.

43. What evidence is there that the four unallocated housing sites within the IP-One Opportunity Areas identified in Policy SP4 are likely to be available to deliver any housing to boost the supply within the Plan period?

1.18 There is currently no evidence to suggest that these four sites are deliverable, indeed the Council state the sites are 'currently in use with insufficient certainty about when the uses may be relinquished'. All four sites are heavily constrained, and it has not yet been demonstrated that these constraints can be overcome. Gladman assert that the Council must provide appropriate evidence should these sites been included within future land supply positions.

44. In accordance with paragraph 68(a) of the NPPF, would at least 10% of the housing requirement be accommodated on sites no larger than 1ha or is there evidence to demonstrate why this 10% target cannot be achieved?

1.19 No comments.

5 year housing land supply

45. Would the Council be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the Plan period?

1.20 The Council set out that it expects to demonstrate a 5.09 housing land supply on adoption using the Sedgefield method with a 20% buffer. The 'Housing Delivery Note'⁵ sets out that 679 homes will be delivered from the Ipswich Garden Suburb in the five-year period 2021-2026. These 679 homes represent a significant proportion of the five-year deliverable supply of 2,465 dwellings between 2021-2026 and, given such a marginal five-year land supply, it is essential that these timescales are not based on unrealistic delivery assumptions.

1.21 As highlighted above, Gladman assert that the Council have failed to provide appropriate delivery rates with regards to the Ipswich Garden Suburb. Application of more realistic delivery assumptions would give rise to a very real risk that, on adoption, the Council will not have a sufficient supply of land to meet five years' worth of housing needs.

1.22 As demonstrated in table 2 below, revising the expected delivery rates at Ipswich Garden Suburb in line with national evidence, would reduce the expected deliverable supply for the period 2021-2026 from 2,465 to 2,262. Against this more realistic deliverable supply the Council would not be able to demonstrate a five-year land supply upon adoption, even when retrospectively re-profiling its annual target to a lower figure for the years 2018/19, 2019/20 and 2020/21 which reduces the shortfall from 517 dwellings to 37 dwellings). Furthermore, as indicated

⁵ Ipswich Borough Council Local Plan Review - Housing Delivery Note. (October 2020).

elsewhere in our hearing statements, options have been open to the Council throughout its plan making process to ensure that sufficient sites can indeed be planned for to meet local housing needs in full, whilst maintaining a five year housing land supply against its annual requirement as a sustainable alternative to the introduction of a stepped trajectory. The five year housing land supply position based on the delivery of an annual average requirement of 460 dwellings is included in table 3 below which clearly shows the ongoing scale of the housing delivery issue in Ipswich since the adoption of the existing Local Plan in February 2017.

Table 2: Five year Housing Land Supply applying revised delivery rates for Ipswich Garden Suburb

	Council	Gladman
Five Year Requirement (20% buffer)	2,420	2,420
Annual Requirement	485	485
Deliverable Supply	2,465	2,262
5 Year Land Supply	5.09 years	4.66 years

Table 3: Five year Housing Land Supply based on annual average requirement of 460 dwellings

		Council	Gladman
A	Plan Requirement 2018 – 2036 460x18	8280	8280
B	Net additional dwellings delivered 1st April 2018 - 31st March 2021 223+421+219	863	863
C	Shortfall = Requirement (2018/19 – 2020/21) 1380 (3x460) – B 863 = 517 deficit	517	517
D	5 year requirement based on annual requirement of 460	2300	2300
E	5 Year requirement + C	2817	2817
F	Add 20% buffer (E x 1.2)	3380	3380
G	Annual requirement for 5 years (F/5)	676	676
H	Supply 2021/22 to 2025/26	2465	2,262
I	5 year supply calculation	3.65 years	3.35 years

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?

1.23 As highlighted above it is Gladman's view that the Council cannot demonstrate a five-year land supply. It is essential therefore that the Council identifies a range of sites which are realistically deliverable and viable, to bolster its land supply position or engage in a process of exporting a proportion of its housing requirement to neighbouring authorities to be delivered through a sustainable strategy to be agreed under the Duty to Cooperate.

47. Alternatively, should the proposed stepping of the housing requirement be revisited to reflect the anticipated trajectory in the delivery of housing sites over the plan period?

1.24 In proposing a stepped housing requirement, the Council is continuing to delay meeting the identified housing needs of the Borough, conflicting with the advice detailed in the PPG. Any proposal to push back delivery even further still through an amended step would mean that needs are met later and that affordability, which is worsening in Ipswich, will continue to decline. It would also represent a retrograde step for the delivery of affordable housing.

48. If we were to conclude that a 5-year supply of specific, deliverable housing sites would not exist on adoption, what would be the most appropriate way forward for the Plan?

1.25 The Plan fails to provide certainty that a five-year supply of deliverable sites will be available on adoption and over the duration of the plan period. The most appropriate way forward would be to revisit the spatial strategy, redistribute an element of the housing requirement and work alongside neighbouring authorities under the Duty to Cooperate to direct development to locations beyond the borough boundary that can demonstrably support the timely and sustainable delivery against the housing needs of Ipswich.

Affordable Housing

53. Is the requirement in Policy CS12 for at least 15% affordable housing on sites of 15 dwellings or more justified by the evidence on affordable housing need and viability and would it be deliverable on brownfield sites in particular, taking account of the full range of development and policy costs?

1.26 No comments

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?

1.27 The proposed strategy within the Local Plan would result in a significant planned shortfall in affordable housing delivery over the course of the plan period. The Council's evidence sets out that 1,814 new homes would be expected to be delivered against an affordable housing need of 4,300 homes. Furthermore, the viability constraints associated with the nature of the brownfield sites that are being relied upon in lower value areas are likely to exacerbate this issue, particularly in the early years of the plan. Taking this into account, an increase in the total housing requirement should have been built into Plan's strategy to assist the delivery of the required number of affordable homes in line with the PPG⁶. Such an approach will require the Council to work under the Duty to Cooperate to identify additional opportunities to deliver against unmet housing needs in sustainable locations beyond the borough boundary.

⁶ Planning Practice Guidance Paragraph: 008 Reference ID: 67-008-20190722