

Ipswich Local Plan Review 2018-2036

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?”

Statement Prepared by:

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On behalf of:

Grainger PLC

Word Count: 2,091

1. This Statement has been prepared by Turnberry on behalf of Grainger PLC (Grainger), in advance of the Examination in Public (EiP) of Ipswich Borough Council's Local Plan Review (the Plan). This Statement responds to **Matter 3 – Housing Provision**.

Background

2. We have responded to previous stages of consultation on the emerging Local Plan and have made the point that more land for housing serving the wider Ipswich Area must be found in light of past under-delivery rates and the need arising from employment growth in the Ipswich Strategic Planning Area. In that respect we have promoted land at Kesgrave through the recent Suffolk Coastal Local Plan Review process.
3. The north western part of the site is under Option to Persimmon Homes and has been subject to a planning application for 300 dwellings. The application was the subject of an appeal which concluded that the site is a highly sustainable location for development but was rejected on grounds of being contrary to the adopted Local Plan.
4. As set out below, our statements support the adoption of the Ipswich Local Plan Review, however given that the Council are only just able to demonstrate a 5 year housing land supply and have faced significant historic under delivery issues, we propose that Ipswich should commit to an immediate review with neighbouring authorities. This review should seek to allocate a broader range of deliverable sites within close proximity to Ipswich that are well-served by public transport. These sites would balance the deliverability issues around large strategic allocations on which the Ipswich and East Suffolk spatial strategies rest.
5. Our responses below are set out thematically, with questions grouped into three categories; Housing Requirement, Housing Land Supply, and 5 Year Housing Land Supply.

Response to Main Matter 3 Questions

Housing Requirement

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?

6. Ipswich, as County Town, is a key focus for employment growth as outlined in Policy ISPA1, which concludes that Ipswich will provide approximately 40% of all jobs across the ISPA during the Plan period. Just as the economic strategy for the ISPA acknowledges the functional relationship with Ipswich's neighbouring boroughs, so too should its housing strategy. The draft Local Plan is proposing to take just 23% of the ISPA's housing growth, with the balance met by other ISPA authorities housing strategies relying on strategic allocations, often at significant distance from the source of need i.e. Ipswich town centre.
7. These more distant sites are delivering the type of accommodation Ipswich needs i.e. conventional family sized housing as identified in the Ipswich and Waveney Housing Market Areas SHMA (September 2017), rather than higher density housing within the Town centre which have a track record in protracted delivery.
8. The issue is therefore less how much housing has been identified, but have sufficient sites been identified which are capable of delivering the type of housing needed within Ipswich within the first 5 years of the Plan? The answer to this question means the Council is compelled to go beyond the Standard Method and find sites which deliver

the right housing that can support the economic strategy for Ipswich for the entire duration of the Plan, not just in its later stages. This reason would comply fully with Paragraph 10 of the guidance related to Housing and Economic Needs (Ref ID: 2a-010-20190220) regarding when it is appropriate to plan for a higher figure.

Housing Land Supply

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?

9. The stepped delivery outlined in Policy CS7 is not justified, and indeed the housing trajectory produced at Appendix 3 of the Main Modifications document I31 shows that the Council are not able to meet the reduced delivery rate of 300dpa in 4 of the first 5 years of the Plan period.
10. Delivery is then estimated to rise to between 600 and 700dpa for the remainder of the Plan period, however previous delivery rates are far lower than this despite a similar annual housing target. In our response to Main Matter 2 questions 14-18 we have outlined how Ipswich has provided just 56% of its total housing target since 2012. In light of this it appears that the stepped delivery rate will not be possible to achieve, particularly as the higher rate in the later stages of the Plan are based on the delivery of housing which requires the development of significant infrastructure which does not

yet exist, particular at Humber Doucy Lane as outlined in Policy ISPA4: Cross Boundary Working to Deliver Sites.

11. The Council should instead work with neighbouring authorities to allocate sites which are deliverable within years 0-5 of the Plan in terms of possessing existing infrastructure capacity and sustainable transport links to the town centre as well as able to deliver conventional family housing of the type that the market within the IPSA has been able to deliver versus more urban and intense schemes promoted within Ipswich centre. This would achieve a more realistic delivery timetable and reduce the risk associated with one or more site allocations failing to deliver as planned.

39. Do the Council's assumptions for a 10% slippage in the delivery of housing from sites with planning permission or sites with resolution to grant subject to a S106 agreement make reasonable allowance for the non-implementation of permissions?

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?

12. The last time housing delivery slippage was published was the 2011/12 Authority Monitoring Report which stated that of 499 units under construction, 368 (74%) were on stalled sites. The Council should provide updated figures to 2019/20 in order to evidence the 10% slippage rate buffer.
13. Slippage is an issue across the ISPA, particularly in neighbouring East Suffolk. The majority of Suffolk Coastal's development has been directed to a 2,000 home scheme at Brightwell Lakes. The delivery of this scheme has slipped several times, having originally been scheduled to deliver homes in 2018/19. Delivery is now not projected until 2022/23 at the earliest and at a reduced annual rate. This demonstrates the

vulnerability of locating the majority of growth in a small number of large urban extensions and points to an increasing crisis of under-delivery across the ISPA.

14. This is particularly relevant in light of the Council's 5.09 year housing land supply which contains very little flexibility in the event that sites do not come forward as planned. In line with paragraph 11 of the NPPF which states that Plans should be sufficiently flexible to adapt to rapid change, and paragraph 81 which requires Plans to be flexible enough to enable a rapid response to changes in economic circumstances. Given the uncertain economic climate in relation to Brexit and COVID-19, the Council should plan for a higher rate of delivery than the current target, where appropriate working with neighbouring authorities to allocate a broader mix of deliverable sites in the wider Ipswich Strategic Planning Area.

5 Year Housing Land Supply

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 deliver of any of the allocated sites stall in the first 5 years?

15. As discussed in our previous responses above there is a clear and pressing need for additional sites to contribute to Ipswich's housing need, particularly in the first 5 years post-adoption. Ipswich, as County Town, is set to be the focus of a significant number of new jobs in the ISPA, as set out in Policy ISPA1 which states that "*Ipswich will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area*". It is clear that despite the high levels of projected employment growth Ipswich does not have enough specific, deliverable sites within its boundaries to accommodate

the corresponding level of housing need. This has led to Ipswich being recognised as the slowest growing town in the country by population in a 2020 Cities Outlook report by Centre for Cities.

16. In particular, employment is projected to increase within the East of Ipswich planning area, especially within Suffolk Coastal District Council which has seen a 13.4% increase in employment from 2001-2016 owing to Felixstowe and Martlesham employment area being centres for employment east of Ipswich. Business and professional services has a forecasted growth of 12,400 jobs (+31%), with the majority of associated demand for office space focused within Ipswich town centre and at Martlesham Heath/Adastral Park. Therefore, unmet housing need in Ipswich should be sustainably located close to the source of that need and where employment opportunities are greatest. This is supported by Paragraph 103 of the NPPF which states that Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
17. As we have outlined in representations to previous Local Plan consultations, both by Ipswich Borough Council and East Suffolk Council, the Council should therefore trigger the review clause within the East Suffolk Local Plan and identify sites in that Borough and others to provide a sufficient buffer of available housing sites should any of the existing allocations fail to deliver in line with the housing trajectory, and should do so in accordance with the terms of the NPPF i.e. unmet need being sustainably located closest to the point of need, along arterial routes with good bus links and in the East

of Ipswich area, close to the largest employment centres of Ipswich, Martlesham and Felixstowe.

18. Grainger's site at Kesgrave is perfectly placed to act as an additional allocation to ensure that housing land supply will not slip below 5 years should any other allocation fail to deliver. It is already well served by public transport and has radial connections directly in to the town. Investment in public transport provision in this area, both in terms of infrastructure and travel planning will lead to a more sustainable pattern of development rather than promoting large scale development in more distant centres.

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?

19. If the Inspector were to conclude that a 5 year supply of specific, deliverable housing sites would not exist on adoption our proposed solution would be to commit Ipswich to an immediate review of its spatial strategy of the Local Plan, looking outwith its constrained settlement boundary and working with neighbouring authorities to allocate housing as close to the town as possible across a broad range of sites. This would be in compliance with Policy ISPA1 of the Local Plan and the Statement of Common Ground agreed by authorities within the ISPA.
20. As discussed above in our answer to question 36, Kesgrave could almost be regarded as a suburb of Ipswich and forms part of a contiguous built-up urban area. It has existing excellent public transport links and offers sufficient land to allow the development of the quantum of family sized housing identified as needed in the Ipswich and Waveney Housing Market Areas SHMA (September 2017).

21. This would accord with paragraph 103 of the NPPF which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Further to this, paragraph 104 states that planning policies should minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.