

Ipswich Borough Council Local Plan Review 2018 – 2036

Response to Matter 3 – Housing Provision

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

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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)

The Policy CS7 housing requirement should be increased to at least 8,280 dwellings or 460 dpa, to reflect the updated affordability ratio published on 19th March 2020.

The implications of this have been considered through the Topic Paper, 'Reviewing the Ipswich Housing Figure' (CDL D52)¹.

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?

The housing requirement is calculated in accordance with the Government's standard methodology. The Council considered uplift to the housing requirement figure and concluded that it is not appropriate (CDL D52). The Suffolk Framework for Inclusive Growth prepared alongside devolution plans has been superseded by the Suffolk Growth Framework (CDL D0)², which is reflective of Local Plan growth scales. In February 2020, Suffolk County Council cancelled the Ipswich Northern Routes infrastructure project, which had been investigated to improve connectivity and enable the delivery of further growth for the next round of Local Plan reviews. The Council has not agreed to take unmet need from neighbouring authorities. Therefore, the circumstances described in the Planning Practice Guidance (Paragraph: 010 Reference ID: 2a-010-20190220 CDL C10³) are not found in Ipswich.

The ILPR is based on economic evidence that considers the whole Ipswich Functional Economic Area (CDL D2)⁴ and cross boundary relationships in terms of the growth potential of different economic sectors and the respective locational or clustering preferences of sectors (CDL D1, e.g. paragraphs 4.37 to 4.48)⁵. The ILPR supports sustainable economic growth in the Ipswich Strategic Planning Area (ISPA) through Policy CS13 and allocates land for approximately 9,500 jobs within the Borough boundary. The spatial strategy pursued (covered under Matter 2) seeks to meet housing and employment needs but does not inflate the jobs target beyond the identified need. Therefore, it is not appropriate to uplift the housing requirement to support economic growth.

37. Has the Council been asked if it can accommodate any unmet housing needs from other LPA areas within the HMA?

The Council has not been asked if it can accommodate any unmet housing needs from other LPA areas within the HMA.

¹ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52 - reviewing the ipswich housing figure topic paper june 2020.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf)

² [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d0 - suffolks growth framework.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d0_-_suffolks_growth_framework.pdf)

³ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Employment-Land-Needs-Assessment-2017.pdf>

⁵ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/14400.02_final_ipswich_elsa_report_12.04.18.pdf

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?

The stepped approach to the Ipswich Housing Requirement is justified by the nature of the housing land supply, specifically the strategic allocations at Ipswich Garden Suburb (IGS) (Policy CS10) and the northern end of Humber Doucy Lane (Policy ISPA4). Homes will be delivered simultaneously across all three main IGS land parcels from 2024/25. A more detailed justification is set out in 'Reviewing the Ipswich Housing Figure' (CDL D52).

The Council published a Housing Delivery Action Plan in August 2019 (CDL D19)⁶ and a 2020 review (CDL I37)⁷ and is also delivering directly through its own house building programme. The trajectory illustrates that a step-change in delivery will occur when completions start at IGS. Houses provided at IGS complement higher density provision on regeneration sites in central Ipswich. This more diverse offer also helps to build resilience to market fluctuations. Therefore, the stepped approach is justified.

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?

It is not a requirement to include for slippage, but the Council has consistently applied 10% slippage to such sites across the adopted and emerging Local Plans. Sites previously listed under Policy SP3 where progress has stalled have been de-allocated through the ILPR. For example, IP226 Helena Road is now an opportunity site under ILPR Policy SP4. The 10% allowance coupled with the de-allocation of sites where delivery has become uncertain ensures the approach is robust.

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?

Trend data published annually through the Authority Monitoring Reports (e.g. CDL E1⁸, E2⁹) provide compelling evidence supporting the windfall assumption. The five-year trend (Table 3.1 below) shows average windfall completions at 115 dwellings p.a. (statistics exclude garden land after 2015). Therefore, the windfall allowance of 50 dwellings p.a. from 2023 onwards (650 total) is a conservative estimate based on trend and is significantly lower than the adopted Local Plan assumption of 1,800 dwellings in total from windfall. For clarity, the

⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/draft_housing_delivery_action_plan.pdf

⁷ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i37_-_housing_delivery_action_plan_monitoring_review.pdf

⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/e1_-_authority_monitoring_report_2018-2019_0.pdf

⁹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/authority_monitoring_report_2017-2018.pdf

windfall assumption in Policy CS7 is not limited to small sites. Therefore, a modification is proposed to Policy CS7.

Table 3.1 Windfall completions in Ipswich 2014-2019

Year	Windfall Completions (dwellings)
2018-19	68
2017-18	43
2016-17	175
2015-16	230
2014-15	59
Total	575
Average per year	115

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?

The housing trajectory is informed by: site-specific information from site promoters through the SHELAA (CDL D13)¹⁰; the development management process; statements of common ground (SsoCG); and the Council’s Major Projects Team. This is relevant to the first five years and key elements of supply beyond it, including IGS and Council-owned sites.

Published national research suggests significant variability in delivery timescales. This is echoed in Ipswich and is influenced by the site’s size and nature (26% of Ipswich sites are under 1ha), locational factors such as market attractiveness, and the circumstances of the landowner or developer. For sites later in the plan period, the primary consideration is the time needed to resolve constraints such as relocating existing uses (e.g. IP003 Waste Tip and Employment Area). Annual build-out rates applied fall within the range of completion rates observed locally (CDL E1, E2).

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?

The ILPR allocates sufficient land to meet the housing requirement over the plan period, as illustrated through the trajectory included in ‘Reviewing the Ipswich Housing Figure’ (CDL D52).

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?

¹⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/shelaa_january_2020_final.pdf

There is insufficient evidence to provide the certainty needed to allocate the sites through policy SP2. Therefore, they are identified as Opportunity Sites through policy SP4 and their capacity is not included in housing land supply calculations for the ILPR.

The purpose of identifying the Opportunity Sites is to express the Council's support for a residential-led redevelopment of four prominent central sites. This offers confidence and support to potential developers, should market conditions change or if changes in ownership were to improve availability or deliverability. It is the Council's wish to see the sites deliver housing within the Plan period, which would boost the supply. However, the ILPR is not dependent on the delivery of these sites.

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?

As stated in paragraph 4.9 of the Site Allocations Plan, 26% of the capacity is accounted for by sites of under 1ha.

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?

The Council's calculations in 'Reviewing the Ipswich Housing Figure' (CDL D52) updated the five-year supply position to 1st April 2020. Further adjustments are made to reflect site information at October 2020 described through SsoCG (e.g. CDL I19¹¹, I20¹², I24.1¹³, I25¹⁴, I26¹⁵, I27¹⁶) but retaining the 1st April 2020 base date for planning permissions. The most up to date position is shown in Table 3.2 below (detail in Appendix 1). It shows a five-year supply of 5.09 years at adoption and a rolling five-year supply for the next ten years with a stepped housing requirement of 300dpa for the first six years and 540dpa for the latter twelve years. Beyond 2030, housing needs have been met (see Graph 3.1 below) and the plan will have been subject to review.

Table 3.2 Rolling five-year housing land supply including 20% buffer (updated October 2020)

	Completions /Expected Completions (Oct 2020)	Housing Supply with stepped 300 & 540 requirement
2018/19	223	
2019/20	421	

¹¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i19_-_mersea_homes_socg_red_house_neighbourhood_final_socg_29_09_20ibc_signed_0.pdf

¹² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i20_-_westerfield_house_socg_30th_sept_0.pdf

¹³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i24.1_-_norsk_hydro_socg_ip143_06_10_20.pdf

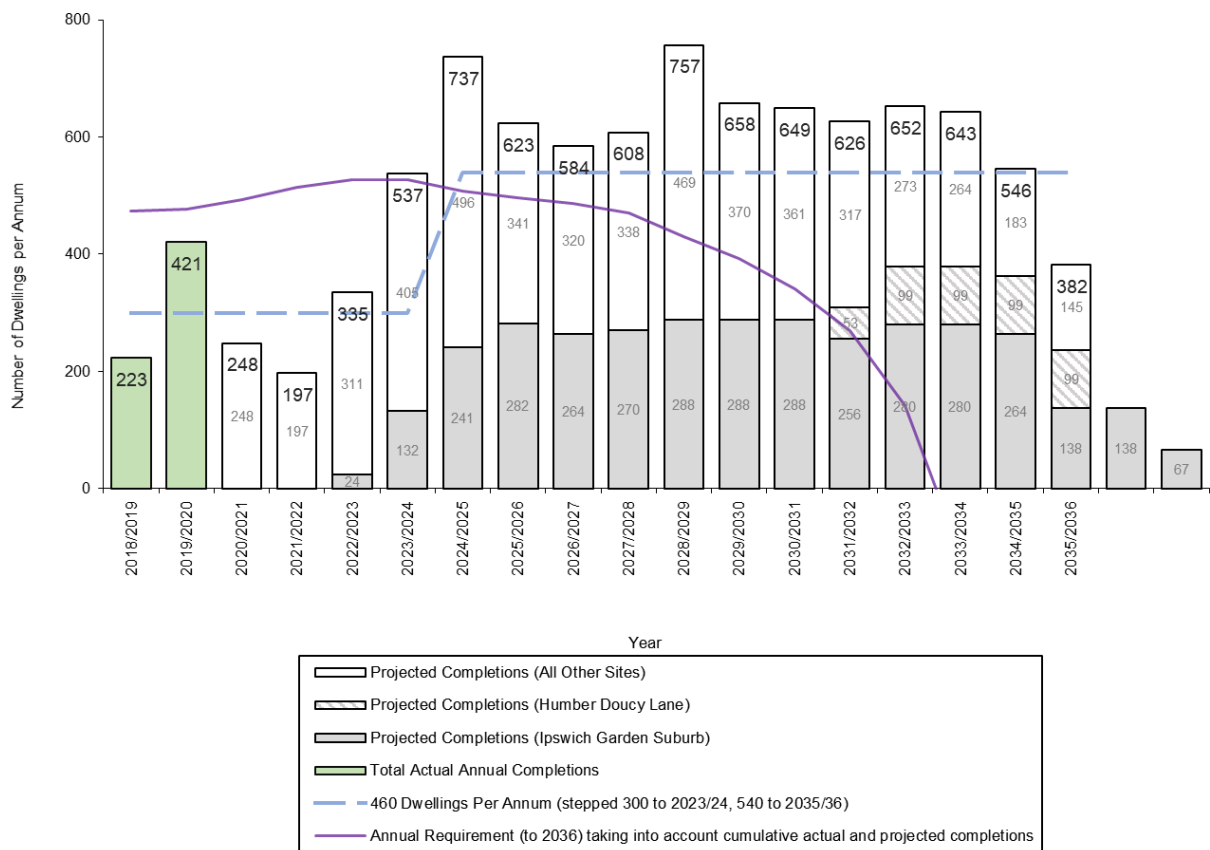
¹⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i25_-_ibc_and_ipswich_borough_assets_2.10.20_0.pdf

¹⁵ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i26_-_ibc_and_ipswich_borough_council_as_landowner_2.10.20_0.pdf

¹⁶ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i27_-_ibc_handford_homes_2.10.20_0.pdf

2020/21	248	5.09
2021/22	197	5.03
2022/23	335	5.08
2023/24	537	5.43
2024/25	737	5.75
2025/26	623	6.01
2026/27	584	6.20
2027/28	608	6.49
2028/29	757	6.97
2029/30	658	7.17

Graph 3.1 Housing trajectory April 2020 (updated October 2020) showing housing need met during 2032-33



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?

The five-year supply as calculated in the topic paper (CDL D52) and updated to October 2020 incorporates a 20% buffer. The Council's approach, should there be any shortfall in the five-year supply, is as set out in paragraph 17 of the Housing Delivery Note (CDL I24¹⁷). This is to:

- review sites in years 6-10 to pull forward sites from later in the plan period,
- review the SHELAA, and
- review the site building programme of Handford Homes, Ipswich Borough Assets and the Council as landowner.

In updating the housing trajectory to April 2020 (CDL D52) and now October 2020 (above and detailed Appendix), the Council has included all the sites in the five-year supply which are considered deliverable in the timeframe. It excludes care homes, which provides some additional flexibility in the supply. Developers' intentions are constantly changing, and further work would be undertaken to re-examine sites, particularly sites in years 6-10 within the Council's control.

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?

The approach to the stepping is explained in 'Reviewing the Ipswich Housing Figure' (CDL D52). To comply with PPG, the stepping reflects the delivery of strategic sites. 2024 is the first year when there will be simultaneous delivery in all three IGS neighbourhoods. Therefore, this is the appropriate date for the stepped housing requirement to change. The 1st April 2020 housing trajectory updated to October 2020 shows that from 2024 to 2036, average annual delivery at IGS is 285dpa.

An alternative approach to stepping which more closely reflects the updated housing trajectory information at October 2020 would provide greater flexibility in the ILPR to cover any issues with site delivery in the first five years.

A potential alternative stepped requirement is as follows:

6 years @ 250 dpa = 1500

12 years @ 565 dpa = 6780

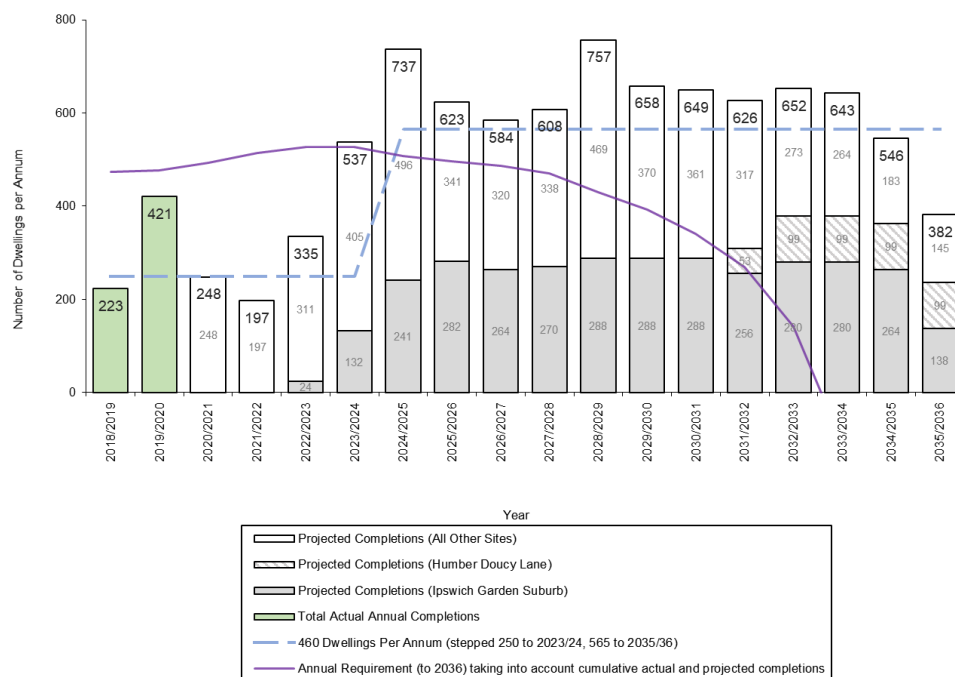
The resulting rolling five-year supply calculation and trajectory graph are shown in Table 3.3 and Graph 3.2 below.

¹⁷ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i24 - housing_delivery_note_final_2.10.20.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i24_-_housing_delivery_note_final_2.10.20.pdf)

Table 3.3 Rolling five-year housing land supply showing alternative stepping

Year	Completions / Expected Completions	Housing supply with stepped 250 & 565 requirement
2018/19	223	
2019/20	421	
2020/21	248	5.82
2021/22	197	5.57
2022/23	335	5.51
2023/24	537	5.83
2024/25	737	6.14
2025/26	623	6.36
2026/27	584	6.50
2027/28	608	6.72
2028/29	757	7.15
2029/30	658	7.27

Graph 3.2 Housing Trajectory April 2020 showing alternative stepping



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?

The most appropriate way forward would be to reduce the stepped housing requirement for the first six years of the plan period 2018 to 2024 (and increase the requirement for the latter twelve years) to provide greater flexibility in the five-year supply.

49. How does the updated evidence on the need for and supply of accommodation for Gypsies and Travellers set out in the Response from RRR Consultancy [I21] compare with the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment [D17] In particular, where have the 6 additional pitches been created and how have the accommodation needs of the 6 families who have moved off site been met?

The updated evidence provided by RRR Consultancy (CDL I29)¹⁸ (based on data from non-face to face consultation due to Covid-19 restrictions) compared to the 2017 ANA (CDL D17)¹⁹ (based on face-to-face consultation with households on all three sites) is in Table 3.4 below.

Table 3.4 Availability of pitches

Key factors	2017	2020	Difference between 2017 ANA and 2020
Occupied pitches	39	45	+6
Pitches made available during the 5-year period (see previous response)	3	7	+4

The updated evidence results in an increase in supply of 10. Additional need in 2017 was 13 for the first 5 years (ending 2021). The previous written response (CDL I29) indicates this need has been reduced by 4, resulting in an additional need of 9. Thus, the net additional need remaining for the first five years is -1.

Based on consultation carried out since the 2017 ANA, 6 pitches have been created on the two sites which are currently in the process of being sold. They were previously local authority sites and, for various reasons, have undergone numerous changes. This includes 6 households leaving the site and having their accommodation needs met outside the Borough and therefore no longer requiring Council support.

50. In the absence of the allocation of any new gypsy and traveller accommodation sites within the ILPR, how and where will the need for additional permanent pitches required from 2021-2026 be met within the Borough during the Plan period, to ensure compliance with paragraph 10 of the PPTS?

¹⁸ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/i29_-_rrr_consultancy_response_oct_2020_0.pdf

¹⁹ <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Gypsy-Traveller-Travelling-Showpeople-Boat-Dwellers-Accommodation-Needs-Assessment-May-2017.pdf>

The Council is taking an active role in identifying accommodation need and following this up by working with individuals and families to find the best way to address this.

The Council commissioned specialist consultants to assess progress against meeting the need identified in the 2017 ANA. This will be followed by ongoing liaison between the Council, consultants and the families with accommodation need, to assist the Council in addressing needs, by proactively bringing sites forward over the rest of the plan period. These are expected to be small family sites, below the threshold for allocation (CDL D54)²⁰. The Council will also start a review of the ANA through the consultants in 2021, as set out in the RRR Consultancy Response (CDL I29).

51. Should the Council look to identify smaller sites now, rather than leaving it to 'normal development management functions' as proposed in the amended Policy CS11?

The Council is not simply leaving it to 'normal development management functions' but also working with those in need to find suitable land and work with them to the point of their respective needs being met (CDL I29).

52. Would the modifications proposed by the Council to Policy CS11, to allow flexibility in addressing the need for short stay stopping sites within Suffolk, ensure the appropriate provision is made within the Plan period?

The Council is involved in a pan-Suffolk approach to jointly address the needs of the unauthorised encampments in the area. This includes identifying transit sites and developing a countywide negotiated criteria-based stopping policy with local authorities and the Police. Our consultants are currently working with the relevant bodies to help progress this further. The proposed modifications commit to making appropriate provision on a county-wide basis. The supporting text requires further modification.

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?

Yes, the requirement for at least 15% affordable housing on sites of 15 or more dwellings is justified. Paragraphs 24–47 of the Affordable Housing Topic Paper (CDL D53)²¹ explain the justification for the level and threshold of affordable housing in Policy CS12.

The affordable housing requirement of Policy CS12 is viable on brownfield sites in the higher value zone but would not be in the lower value zone. The policy allows for site specific viability assessments to be undertaken where applicants consider that affordable housing and/or other policy costs are not viable.

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

²⁰ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d54_-_gypsies_and_travellers_topic_paper.pdf

²¹ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf

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?

The Affordable Housing Topic Paper (CDL D53) explains how the approach to affordable housing in the ILPR addresses viability and need. The Council's building programme is significant in meeting affordable housing need – see the SsoCG (CDL I25-I27). The Council is also supporting delivery through engaging with Homes England on funding opportunities and negotiating with landowners/developers about how it can take on affordable housing delivery within private market developments.

The Council owns its own dwelling stock and has a focus on providing affordable social housing (CDL D20)²². The Council is the largest single provider of housing in Ipswich having retained its own housing stock of 8,000 properties. Priority 2 of the Housing Strategy includes ensuring that the use of the housing stock is optimised.

Although CDL53 identifies a potential shortfall in affordable housing provision, there are opportunities to increase delivery through:

- i. Continuing to work with Homes England to gap fund provision on brownfield sites in lower value areas – e.g. a new tranche of funding is due to be released in April 2021; and
- ii. Reviewing the balance of delivery on Council-owned sites, which has been assumed at 70% affordable and 30% market provision for most major sites.

These measures can be used to increase delivery to meet need.

55. Is Policy CS12 consistent with national policy in respect of the definition of affordable housing and the range of affordable housing tenures it includes?

Policy CS12 is consistent with the affordable housing definition in the NPPF. Paragraph 8.150 of the ILPR describes types of affordable housing. Policy CS12 differentiates broadly between affordable housing for rent and affordable home ownership.

56. Should Policy CS17 include affordable housing as a broad category of infrastructure to be secured or financed from new developments, given that reference is made to the provision of affordable housing in para. 8.215?

Whilst affordable housing could be considered as infrastructure, it has its own policy approach in ILPR Policy CS12. Therefore, it would be clearer for plan users to delete the reference in paragraph 8.215.

57. Is Policy CS8 sufficiently clear in respect of the required mix of dwelling type and tenure? Does it defer important policy matters guiding the mix of housing types and sizes required in Ipswich to supporting or supplementary documents, such as the SHMA and the Affordable Housing Position Statement? Having regard to Regulations 5 and 6 of the Town and Country

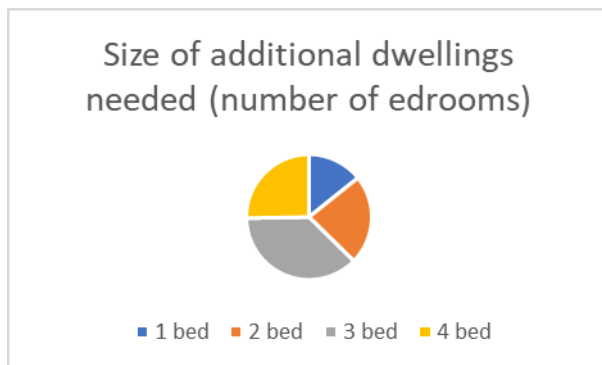
²² https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d20 - ipswich_housing_strategy_2019-2024.pdf

Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Local Plan?

The aim is to keep the ILPR succinct and up to date in accordance with the NPPF and ensure that strategic housing policies address appropriately the pattern, scale and quality of development. In Policy CS8, the adopted plan approach was retained. This refers to an up to date SHMA to determine housing mix, avoiding the need for excessive policy detail, and allowing SHMA updates to be considered. ILPR supporting text indicates the size priorities by tenure. This approach is consistent with the 2012 Regulations.

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?

The housing allocations will deliver an appropriate mix of homes. The pie chart below summarises SHMA (CDL D16)²³ size requirements across all tenures. The greatest need is for 3 bed homes (37%), followed by 4+ (25%) and 2 bed homes (23%) with the smallest need being for 1 bed homes (14%).



The plan strategy combines higher density urban regeneration of brownfield sites with lower density sustainable urban extensions, providing opportunities to meet the full range of needs. The Whole Plan Viability Assessment (CDL D42)²⁴ concludes that brownfield regeneration sites require housing-led dwelling mixes to support viability in some cases. Therefore, the higher density brownfield sites will not deliver only flats or only 1 bed flats. Higher density schemes where recent completions have been delivered include Regatta Quay and Griffin Wharf at the Waterfront, which include 2-bed and 3-bed flats and houses.

59. Is Policy CS8 consistent with national policy in respect of the provision of Self Build and Custom Build dwellings?

Yes. The Policy sets out broad support for self-build and custom housing and expects major housing development applications to consider the register and whether provision should be

²³ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/strategic_housing_market_assessment_part_2_update_january_2019_-_final.pdf

²⁴ https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf

included within the development. This approach balances the need to meet local demand on the register with the challenges of meeting the general housing need of the local population. Many people on the Council's register are interested in plots not on developer-led sites. Whilst the provisions in Policy CS8 would be unlikely to meet these preferences, national policy does not suggest that self/custom build housing should be exempt from the principle of actively managing patterns of growth.

60. Does the Local Plan make adequate provision to meet the needs of the elderly population?

The SHMA update (CDL D16) states that 'Local Housing Need projections indicate that the population aged 65 or over is going to increase dramatically in the HMA over the plan period; from 104,985 in 2018 to 153,578 in 2036, a rise of 46.3%.'

Although there is an ageing population across the whole HMA, Ipswich has a relatively low percentage (16%) of population aged over 65 (CDL B15)²⁵. The largest age group in Ipswich is 25-29-year olds, and 20.3% of the population is aged under 5.

The SHMA also identifies that, in terms of specialist dwellings for older persons, Ipswich is likely to see a surplus of sheltered and extra care housing units by 2036. Therefore, the Council believes it is justified to not include specific provision for specialist homes for older persons within the Plan.

Other ILPR policies address the needs of the ageing population, including:

- Policy DM12 which sets a minimum requirement for M4(2) standard accessible and adaptable dwellings on all new developments over 10 dwellings; and
- Policies DM12, DM27 and CS5 which highlight the need for development to incorporate dementia-friendly design principles.

61. Is the approach to minimum and average densities for residential development in Policy DM23 justified, effective and consistent with national policy?

Yes. The Policy ensures the efficient use of land by requiring minimum densities in the most accessible parts of the Borough (criteria a. and b.). Away from centres and transport hubs, Policy DM23 does not include minimum density standards, because the townscape character and density of these areas is varied. Therefore, criterion c. is based on historic rates set out in the Council's Authority Monitoring Reports. The exceptions clause provides flexibility where e.g. site characteristics or housing need require a different approach.

62. What is the evidence to support the minimum higher and medium density figures of 90 and 45 dph set out in Policy DM23?

²⁵ [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/b15 - ilp sustainability appraisal scoping report aug 2017 v3.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/b15_-_ilp_sustainability_appraisal_scoping_report_aug_2017_v3.pdf)

For clarification, the minimum medium density figure is 40dph (45dph is the average). The density standards of Policy DM23 are identical to the minimum density standards in the adopted Local Plan Review under the equivalent adopted Policy DM30.

Monitoring data in the AMRs (e.g. CDL E1, E2) demonstrate that densities significantly greater than 90dph have been achieved in the areas which fall within criterion a. However, as paragraph 9.23.3 of the ILPR states, due to the challenging market for flats, a 90dph lower starting point is more appropriate to potentially allow for some houses on new developments to achieve better viability (CDL D42). Examples of the medium density being achieved in developments within 800m of a district centre include Cauldwell Hall Road (IP/17/01115/VC - 57dph) and Ulster Avenue (IP/14/00376/FP13 - 55dph).

Therefore, based on monitoring and viability data, the minimum densities are justified.

63. How would the 'average' densities in criteria b and c of Policy DM23 be ensured across multiple sites and allocations?

Average densities are targets that the Council aims to achieve, and the success is monitored through the Council's AMRs. Average densities should not be interpreted as a minimum requirement or something that applicants have to calculate based on different densities delivered across different sites historically.

Conclusion

The ILPR policies relating to the provision for housing are positively prepared, justified, effective and consistent with national policy.

Proposed further modifications to address the matters raised are set out below.

(Word Count 3,235 excluding cover, themes, questions, modifications and Appendix.)

Suggested Modifications

Modification No.	Page of Final Draft Local Plan Review	Policy/ Paragraph of Final Draft Local Plan Review	Main Modification	Reason																				
MM3.1	64	Policy CS7/Table 3	<p>TABLE 3 HOUSING LAND SUPPLY AND MINIMUM REQUIREMENT AT 1st APRIL 2019 <u>2020</u></p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Number of dwellings</th> <th>Discounted Numbers</th> <th>Cumulative Numbers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Completions 1st April 2018 to 31st March 2019 <u>2020</u></td> <td>223 <u>644</u></td> <td>-</td> <td>644</td> </tr> <tr> <td>2</td> <td>Dwellings under construction</td> <td>544 <u>260</u> 350</td> <td>-</td> <td>767 <u>904</u> 994</td> </tr> <tr> <td>3</td> <td>Dwellings with planning permission (includes 1,915 dwellings at Ipswich Garden Suburb)</td> <td>846 <u>3,224</u> 2,845</td> <td>761 <u>2,902</u> 2,561</td> <td>1,528 <u>3,806</u> 3,555</td> </tr> </tbody> </table>			Number of dwellings	Discounted Numbers	Cumulative Numbers	1	Completions 1 st April 2018 to 31 st March 2019 <u>2020</u>	223 <u>644</u>	-	644	2	Dwellings under construction	544 <u>260</u> 350	-	767 <u>904</u> 994	3	Dwellings with planning permission (includes 1,915 dwellings at Ipswich Garden Suburb)	846 <u>3,224</u> 2,845	761 <u>2,902</u> 2,561	1,528 <u>3,806</u> 3,555	In response to question 45 of the MIQs; to update housing figures to reflect 1 st April 2020 position with latest capacity information. (Changes further to modifications outlined in CDL I31 Appendix 2 are identified in bold.)
		Number of dwellings	Discounted Numbers	Cumulative Numbers																				
1	Completions 1 st April 2018 to 31 st March 2019 <u>2020</u>	223 <u>644</u>	-	644																				
2	Dwellings under construction	544 <u>260</u> 350	-	767 <u>904</u> 994																				
3	Dwellings with planning permission (includes 1,915 dwellings at Ipswich Garden Suburb)	846 <u>3,224</u> 2,845	761 <u>2,902</u> 2,561	1,528 <u>3,806</u> 3,555																				

4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section	424,222 217	382,200 195	1,910,400 3,750
5	Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2036	6,100 4,274 4,530		8,010 8,280

The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.

Line 2: Dwellings under construction at 31st March ~~2019-2020~~ - assumed that all will be completed over the plan period.

Line 3: Other dwellings with planning permission at 31st March ~~2019-2020~~ - assumed that 10% of these will not be completed.

Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31st March ~~2019-2020~~ - assumed that 10% of these will not be completed.

*Line 5: To reach the minimum requirement of ~~8,010~~ **8,280** dwellings by 2036, together with windfall sites, further land will need to be allocated within the Borough for at least ~~6,100~~ ~~4,274~~ **4,530** new homes.*

MM3.2	66	Policy CS7	<p>POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED</p> <p>a. The Council has a housing requirement of at least 8,010-8,280 dwellings for the period 2018 – 2036. This equates to an annual average of at least 445-460 dwellings. The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area.</p> <p>b. The Council will secure the delivery of at least 445-460 dwellings per year as an average across the plan period to meet need arising from Ipswich. At 1st April 2019-2020, 223-644 dwellings have been completed since the start of the plan period, and 1,687-4,006 3,106 dwellings (discounted figure) are under construction, have planning permission or have a resolution to grant planning permission subject to a s106 agreement within the Borough.</p> <p>The Council will additionally allocate land to provide for at least 6,100-4,274 4,530 dwellings (net) in the Borough. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. Sites are identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb and the northern end of Humber Doucy Lane. 700-650 dwellings are expected to be delivered on small windfall sites between 2022-2023 and 2036 at a rate of 50 per year. The housing land supply for the plan period will consist of:</p> <p>Housing Land Supply</p> <table data-bbox="638 1220 1758 1372"> <tr> <td>Ipswich Garden Suburb (3,500 minus 232-205 completions expected late 2036 and 1,888 1915 granted planning permission in January 2020)</td> <td style="text-align: right;">3,268 1,380</td> </tr> <tr> <td>Northern end of Humber Doucy Lane allocated through policy ISPA4</td> <td style="text-align: right;">496 449</td> </tr> <tr> <td>Site Allocations through policy SP2 of the Site Allocations Plan</td> <td style="text-align: right;">2,750 2,891</td> </tr> </table>	Ipswich Garden Suburb (3,500 minus 232-205 completions expected late 2036 and 1,888 1915 granted planning permission in January 2020)	3,268 1,380	Northern end of Humber Doucy Lane allocated through policy ISPA4	496 449	Site Allocations through policy SP2 of the Site Allocations Plan	2,750 2,891	<p>In response to questions 40, 45 and 47 of the MIQs; to update housing figures to reflect 1st April 2020 position with latest capacity information. (Changes further to modifications outlined in CDL I31 MM24 identified in bold.)</p>
Ipswich Garden Suburb (3,500 minus 232-205 completions expected late 2036 and 1,888 1915 granted planning permission in January 2020)	3,268 1,380									
Northern end of Humber Doucy Lane allocated through policy ISPA4	496 449									
Site Allocations through policy SP2 of the Site Allocations Plan	2,750 2,891									

			<p>Sub-total 6,514 4,533 4,720</p> <p>Windfall sites 2022 – 2036 @ 50 p.a. 700 650</p> <p>Total 7,214 5,183 5,370</p> <p>c. In accordance with the Planning Practice Guidance, the housing requirement will be stepped to reflect the period when delivery at the strategic site of Ipswich Garden Suburb is expected to take place. From 2024 to 2036, completions at Ipswich Garden Suburb will meet a significant proportion of the annual housing requirement. Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure. The housing requirement will be stepped as follows:</p> <p>April 2018 – March 2024 300-250 p.a. x 6 years = 1800 1,500</p> <p>April 2024 – March 2036 518-540 565 p.a. x 12 years = 6216-6480 6,780</p> <p>In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 8,280 dwellings. This excludes the Opportunity Sites identified through policy SP4.</p>							
MM3.3	68	Policy CS7/Table 4	<p>TABLE 4 ESTIMATED HOUSING DELIVERY FOR 2020-2036 EXCLUDING CURRENT PERMISSIONS AS AT 1ST APRIL 2019 2020</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #e0f0e0;">Area of Ipswich</th> <th style="background-color: #e0f0e0;">%age (dwellings) Previously developed land</th> <th style="background-color: #e0f0e0;">Total Additional dwellings 2020-2036</th> </tr> </thead> <tbody> <tr> <td style="background-color: #e0f0e0;"> </td> <td style="background-color: #e0f0e0;"> </td> <td style="background-color: #e0f0e0;"> </td> </tr> </tbody> </table>	Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2020-2036				In response to question 45 of the MIQs; to update housing figures to reflect 1st April 2020 position with latest capacity
Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2020-2036								

				IP-One	100%	2,034 2,015 <u>2,251</u>	information. (Changes further to modifications outlined in CDL I31 Appendix 4 identified in bold.)
				Rest of built up area	83% 72.4% <u>72.3%</u>	716 (PDL:594) 642 (PDL:465) <u>640</u> (PDL:463)	
				Ipswich Garden Suburb (see policy CS10) (A further 1,915 dwellings at IGS have outline planning permission)	0%	3,268 <u>1,380</u>	
				Northern end of Humber Doucy Lane (see Policy ISPA4)	0%	496 <u>449</u>	

			<table border="1"> <tr> <td>Total 2019 <u>2020-2036</u> (excluding windfall)</td> <td>40.3% 54.7% 57.5%</td> <td>6,514 (PDL:2,628) 4,533 (PDL:2,480) 4,720 (PDL: 2,714)</td> </tr> <tr> <td>Windfall Sites 2022-2023-2036</td> <td>90%</td> <td>700 650 (PDL: 630585)</td> </tr> <tr> <td>Total 2019 <u>2020-2036</u></td> <td>45.2% 59.1% 61.4%</td> <td>7,214 (PDL:3,258) 5,183 (PDL:3,065) 5,370 (PDL: 3,299)</td> </tr> </table>	Total 2019 <u>2020-2036</u> (excluding windfall)	40.3% 54.7% 57.5%	6,514 (PDL:2,628) 4,533 (PDL:2,480) 4,720 (PDL: 2,714)	Windfall Sites 2022-2023- 2036	90%	700 650 (PDL: 630 585)	Total 2019 <u>2020-2036</u>	45.2% 59.1% 61.4%	7,214 (PDL:3,258) 5,183 (PDL:3,065) 5,370 (PDL: 3,299)	
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MM3.4	81	Policy CS11 paragraph 8.114	The ANA identifies a need for three short stay sites across the study area. <u>The short stay work is both identifying suitable sites and developing a county-wide short stay policy with local authorities and the Police.</u>	In response to question 52 of the MIQs									

	98	Policy CS17 paragraph 8.215	Modification to Policy CS17: 8.215 ... through site-specific provision such as open space, <u>and children's play areas</u> and the provision of affordable housing . However, there are ...						In response to question 56 of the MIQs.
MM3.5	17-28	Policy SP2/Table 1	IP009	Victoria Nurseries, Westerfield Road	0.39	12	30dph (DM23c). Low density to reflect suburban location.	S <u>M</u>	In response to question 45 of the MIQs. Modifications update timescales and capacities where necessary; sites with planning permission at 31 st March 2020 have been moved to Policy SP3. (Please see also Appendix 7 CDL I31 regarding format.)
			IP014	Hope Church Redevelopment is dependent on the appropriate relocation of existing uses.	0.21	23 <u>21</u>	110dph (DM23a, higher end of range)	S	
			IP031b	22 Stoke Street	0.18	18	100dph (reflective of highly accessible location. Maximum dph due to heritage constraints)	S	
			IP032	King George V Field, Old Norwich Road Allocated for 80% residential and 20% open space. The allocation is subject to	3.7 (c. 80%)	99	35dph (Development Brief)	<u>M/L</u>	

				the provision of replacement playing fields and ancillary facilities (e.g. changing rooms and spectator accommodation) in a suitable location.					
			IP033	Land at Bramford Road (Stocks site) Allocated for 50% residential and 50% open space.	2.03 (50%)	55	55dph (DM23b / SHELAA)	<u>S-M</u>	
			IP040	Former Civic Centre, Civic Drive (Westgate) This site is allocated for 10% retail and leisure development at ground/first floor level but primarily residential use.	0.73 (90%)	59	90dph (DM23a)	<u>S-M/L</u>	
			IP041	Former Police Station, Civic Drive	0.52	58	110dph (DM23a) higher end of range).	<u>S-M</u>	

			IP042	<u>Land between Cliff Brewery and Landseer Road</u>	<u>1.64</u>	<u>222</u>	Based on application <u>15/1040/OUT</u>	<u>M</u>	
			IP043	Commercial Buildings, Star Lane	0.70 (80%)	50	90dph (DM23a lower end of range). 11/00267/FUL for 65 student rooms pending although unlikely to proceed.	S -M	
			IP047	IP047 Land at Commercial Road	3.11ha	173	55dph on 80% as part of a mixed use scheme of 80% housing, 5% hotel/ leisure/ retail, 5% public open space and 10% enhanced river path, Based on pending application (19/00148/OUT)	S M	

			<p>IP048b</p> <p>Mint Quarter / Cox Lane West regeneration area</p> <p>Residential and retail mix incorporating short stay car parking for shoppers and civic/open space. A development brief for the whole site (a and b) will be prepared but development will come forward incrementally.</p>	1.34 (c. 30%)	36	90dph (DM23a lower end of range)	<u>±M</u>
			<p>IP054b</p> <p>Land between Old Cattle Market and Star Lane</p> <p>The site now excludes the former Archant site to the east of Turret Lane and is allocated primarily for residential use alongside small scale retail and leisure and an extended or replacement electricity sub-station.</p>	1.08 (60%)	40	60dph. High density area (DM23a) but a mix of flats and town houses would fit the character of locality. Hence density higher than medium range.	<u>±M</u>
			<p>IP061</p> <p>Former School Site, Lavenham Road</p> <p>Allocated for part development (60%) on</p>	0.9 (60%)	23	40dph (DM23 b.- c.)	<u>S/M</u>

				the basis of improving the remainder (40%) of the open space. The south-west corner of the land (0.18ha) is being developed (18/00991/FPC) as 4 general housing units and 4 respite care units and has been excluded from the site area.					
			IP080	240 Wherstead Road	0.49	27	55dph (DM23b). Linear layout would allow for slightly higher than average density.	S-M	
			IP096	Car Park Handford Road East	0.22	22	100dph (DM23a lower end of range)	M-S	
			IP125	Corner of Hawke Road and Holbrook Road	0.25	15 24	60 96dph	S	
			IP143	Former Norsk Hydro, Sandyhill Lane	4.51	85	17/00769/OUT	S	

			IP188	Websters Saleyard site, Dock Street	0.11	9	As per permission (19/00173/FUL).	S
			IP150e	Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned	3.6	126	DM23 c. low density as part of mixed use with B1 employment uses	S/M
			IP221	Flying Horse PH, 4 Waterford Road	0.35 (c. 50% retaining the public house)	12	35dph (DM23c). Application for 12 dwellings in application 06/01007/FUL expired.	L/M
			IP279B(1)	Land north of Former British Telecom Office, Bibb Way	0.44	18 35	Based on master planning work with IP279A	S
			IP279B(2)	Land south of Former British Telecom Office, Bibb Way	0.61	29 36	Based on master planning work with IP279A	S
			Total			2,750 <u>2,891</u>		

MM3.6	30-33	Policy SP3	<table border="1"> <tr> <td><u>IP031b</u></td> <td><u>22 Stoke Street</u></td> <td><u>0.18</u></td> <td><u>31</u></td> <td><u>100dph (reflective of highly accessible location. Maximum dph due to heritage constraints)</u></td> <td><u>S</u></td> </tr> <tr> <td>IP042</td> <td>Land between Cliff Quay and Landseer Road</td> <td>1.64</td> <td>222</td> <td>15/01040/OUT awaiting a S106</td> <td>M</td> </tr> <tr> <td>IP088</td> <td>79 Cauldwell Hall Road</td> <td>0.30</td> <td>17</td> <td>17/01115/VC approved 22/02/18</td> <td>S</td> </tr> <tr> <td><u>IP084a</u></td> <td><u>County Hall, St Helen's Street</u></td> <td><u>0.32</u></td> <td><u>40</u></td> <td><u>18/01117/FUL awaiting a S106</u></td> <td><u>S</u></td> </tr> <tr> <td>IP109</td> <td>R/O Jupiter Road & Reading Road</td> <td>0.42</td> <td>13<u>6</u></td> <td>12/00192/FUL (pending)</td> <td><u>S</u></td> </tr> <tr> <td>IP116</td> <td>St Clement's Hospital Grounds</td> <td>11.85</td> <td>108<u>46</u></td> <td>14/00721/OUT <u>16/00659/REM & 16/00677/REM</u> 108 <u>46</u> dwellings outstanding at 01/04/2019-2020</td> <td>S</td> </tr> <tr> <td>IP131</td> <td>Milton Street</td> <td>0.28</td> <td>9</td> <td>15/01158/FUL (& 18/00552/FUL)</td> <td>M<u>S</u></td> </tr> <tr> <td>IP142</td> <td>Land at Duke Street</td> <td>0.39 (75%)</td> <td>44</td> <td>90dph (DM23a lower end of range) (17/00570/FUL)</td> <td>M<u>S</u></td> </tr> </table>	<u>IP031b</u>	<u>22 Stoke Street</u>	<u>0.18</u>	<u>31</u>	<u>100dph (reflective of highly accessible location. Maximum dph due to heritage constraints)</u>	<u>S</u>	IP042	Land between Cliff Quay and Landseer Road	1.64	222	15/01040/OUT awaiting a S106	M	IP088	79 Cauldwell Hall Road	0.30	17	17/01115/VC approved 22/02/18	S	<u>IP084a</u>	<u>County Hall, St Helen's Street</u>	<u>0.32</u>	<u>40</u>	<u>18/01117/FUL awaiting a S106</u>	<u>S</u>	IP109	R/O Jupiter Road & Reading Road	0.42	13 <u>6</u>	12/00192/FUL (pending)	<u>S</u>	IP116	St Clement's Hospital Grounds	11.85	108 <u>46</u>	14/00721/OUT <u>16/00659/REM & 16/00677/REM</u> 108 <u>46</u> dwellings outstanding at 01/04/2019-2020	S	IP131	Milton Street	0.28	9	15/01158/FUL (& 18/00552/FUL)	M <u>S</u>	IP142	Land at Duke Street	0.39 (75%)	44	90dph (DM23a lower end of range) (17/00570/FUL)	M <u>S</u>	<p>In response to question 45 of the MIQs. Sites with planning permission at 31st March 2020 have been added. Sites completed by 31st March 2020 have been deleted. Applications that have been withdrawn have been moved to Policy SP2. (Please see also Appendix 7 CDL I31 regarding format.)</p>
			<u>IP031b</u>	<u>22 Stoke Street</u>	<u>0.18</u>	<u>31</u>	<u>100dph (reflective of highly accessible location. Maximum dph due to heritage constraints)</u>	<u>S</u>																																												
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				Allocation to provide for public open space (25%).					
			<u>IP143</u>	<u>Former Norsk Hydro</u>	<u>4.5</u>	<u>85</u>	<u>17/00769/OUT approved 04.10.2019</u>	<u>S</u>	
			IP150a	Ravenswood U, V, W	2.23	<u>94 96</u>	07/00765/OUT for part of outline site	S	
			IP161	2 Park Road	0.35	14	19/00065/FUL pending approved <u>27.09.2019</u>	S	
			IP165	Eastway Business Park, Europa Way	2.08	78 8	As per approved scheme (13/00943/OUT 17/00795/FUL) and now on site. Under construction 78 8 outstanding.	S	
			<u>IP188</u>	<u>Webster's Saleyard site, Dock Street</u>	<u>0.11</u>	<u>9</u>	<u>19/00713/FUL approved 01.10.2019</u>	<u>S</u>	
			IP200	Griffin Wharf, Bath Street	0.79	113 71	17/00382/FUL pending approved <u>11.06.2019</u> Previous pps: 11/00507/FUL approved	S	

							01.09.2011 (132 flats) 05/00819/FUL.		
			IP205	Burton's, College Street	0.19	14 <u>9</u>	02/01241/FUL (196 in total, 71 completed April 2014). Application 19/00624/FP13 on part of site for 14 self-contained flats)	S/M	
			IP206	Cranfields, College Street	0.71	134	04/00313/FUL (337 in total, 197 completed April 2014) 16/00092/VC (replaced 16 of the flats with 43 (29 studios + 14 one-beds)	S/M	
			IP211	Regatta Quay, Key Street	0.85	156	09/00130/FUL (pending) 05/00296/FUL added 25 extra units. 150 (at winerack) and 6 at 16/00346/FUL	S	

			IP214	300 Old Foundry Road	0.02	12	10/00805/VC expired Dec 2013. 17/00144/FUL	S
			IP245	12-12a Arcade Street	0.06	14	18/00899/FUL <u>approved</u> 06.09.2019	S
			IP256	Artificial hockey pitch, Ipswich Sports Club, subject to the requirements of policy DM5 being met.	0.6 (excludes access road)	28	16/00987/FUL Awaiting S.106 <u>approved</u> 20.09.2018	S
			<u>IP274</u>	<u>Rear of former Maypole PH, Old Norwich Road</u>	<u>0.39</u>	<u>11</u>	<u>16/00763/FUL</u> <u>awaiting S.106</u>	<u>S</u>
			IP279a	Former British Telecom, Bibb Way	0.63	104 <u>78</u>	18/00470/P3JPA <u>approved</u> 20.07.2018	S
			<u>IP280</u>	<u>Westerfield House, Humber Doucy Lane</u>	<u>3.5</u>	<u>156</u>	<u>14/01039/FUL</u> <u>17/00489/VC &</u> <u>18/00526/OUT</u>	<u>S</u>
			IP283	25 Grimwade Street. Student Union Club and adjacent car park, Rope Walk	0.27	14	17/00049/FUL <u>approved</u> 23.08.2018	S
			<u>IP386</u>	<u>28-50 Grimwade Street</u>	<u>0.15</u>	<u>13</u>	<u>19/01118/FUL</u> <u>awaiting a S106</u>	<u>S</u>

					1,470			
				Total	<u>1,198</u>			

Appendix 1 Housing Trajectory October 2020 – updated to reflect latest positions through statements of common ground (supersedes Appendix 5, CDL I31)

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Total dwellings built on site	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	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)	2035/36 (Yr 15)	Total Identified Supply
IP003		Allocation (SP2)	Waste Tip & Employment Area IP1 2DW (north of Sir Alf Ramsey Way)	B	1.41	0	114	114	0													25	30	34	25	114
IP004	UC004	Allocation (SP2)	Bus depot, Sir Alf Ramsey Way IP1 2DP	B	1.07	0	48	48	0											24	24					48
IP005	16/00969	Full - approved (SP3)	Former Tooks Bakery, 731 Old Norwich Road	B	1.98	0	60	60	0	60																60
IP009	UC009	Allocation (SP2)	Victoria Nurseries, 1 Kettlebaston Way IP4 2XX	B	0.39	0	12	12	0							12										12
IP010a	UC010 part a	Allocation (SP2)	Former Co-op Depot, Derby Road & Hines Road	B	2.22	0	75	75	0									25	25	25						75
IP010b	UC010 part b	Allocation (SP2)	Felixstowe Road (237 to 297)	B	2.79	0	62	62	0									31	31							62
IP011a	UC011 part	Allocation (SP2)	Former Gym and Trim Health Club, Lower Orwell Street IP4 1BU	B	0.16	0	18	18	0							18										18
IP011b	UC011 part	Allocation (SP2)	Eastern Counties Bus Depot, Foundation Street IP4 1BQ and 6 Smart Street IP4 1BP	B	0.62	0	56	56	0												28	28				56
IP011c	UC011 part	Allocation (SP2)	Car Park, Smart Street	B	0.08	0	7	7	0								7									7

Site Reference	Planning application ref.	Status (Allocation, Outline, Reserved Matters, Full, Prior Approval)	Name and address of site	Greenfield/Brownfield	Site Area	Total dwellings built on site	Residual completions expected by 2036	Total number of dwellings on site	No. residual expected to be completed in 5 years	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)	2035/36 (Yr 15)	Total Identified Supply	
IP012	UC012	Allocation (SP2)	52 to 60 Grimwade Street IP4 1LP & Portia House Star Lane IP4 1JN (Peter's Ice Cream)	B	0.32	0	35	35	0							35											35
IP014		Allocation (SP2)	92 - 94 and Hope Church, 114 Fore Hamlet IP3 8AF	B	0.21	0	21	21	21				21														21
IP015	UC015	Allocation (SP2)	Car Park, West End Road	B	1.22	0	67	67	0									25	30	12							67
IP031a	UC032	Allocation (SP2)	Car Park, Burrell Road	B	0.44	0	20	20	0									20									20
IP031b	19/00369	Full S106 (SP3)	22 Stoke Street IP2 8BX	B	0.18	0	31	31	31			31															31
IP032	UC033	Allocation (SP2)	King George V Field, Old Norwich Rd	G	3.7	0	99	99	0												33	33	33				99
IP033	UC034	Allocation (SP2)	Land at Bramford Road (Stocks site)	G	2.03	0	55	55	0								27	28									55
IP035		Allocation (SP2)	Key Street/Star Lane (St Peter's Port)	B	0.54	0	86	86	0								40	46									86
IP037	UC038	Allocation (SP2)	Island site	B	6.02	0	421	421	0												55	70	75	75	76	70	421
IP039a	UC040	Allocation (SP2)	Land between Gower Street and Great Whip Street	B	0.48	0	45	45	0														22	23			45
IP040		Allocation (SP2)	Civic Centre area, Civic Drive	B	0.73	0	59	59	0												25	34					59
IP041		Allocation (SP2)	Former Police Station, Civic Drive	B	0.52	0	58	58	0							20	38										58

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IP042	15/01040/OUT withdrawn	Allocation (SP2)	Land between Cliff Quay and Landseer Road	B	1.64	0	222	222	0								74	74	74							222
IP043	UC044	Allocation (SP2)	47 Key Street and Slade Street Car Park, Star Lane	B	0.7	0	50	50	0								25	25								50
IP047	08/00953 & 19/00148	Allocation (SP2)	Land at Commercial Road	B	3.11	0	173	173	173				35	65	73											173
IP048a	UC051	Allocation (SP2)	Mint Quarter (east)	B	1.33	0	53	53	0									26	27							53
IP048b		Allocation (SP2)	Mint Quarter (west)	B	1.34	0	36	36	0										36							36
IP048c	18/00740	Prior Approval - approved (SP3)	6-10 Cox Lane and 36-46 Carr Street (upper floors)	B	0.23	0	33	33	0	33																33
IP054a	16/01037	Full - approved (SP3)	30 Lower Brook Street	B	0.56	0	62	62	62					62												62
IP054b		Allocation (SP2)	Land between Old Cattle Market and Star Lane	B	1.08	0	40	40	0												40					40
IP059	16/01220	Outline (S106) (SP3)	Elton Park Industrial Estate, Hadleigh Road	B	2.97	0	103	103	68					34	34	35										103
IP061	UC064	Allocation (SP2)	Former School Site, Lavenham Road	G	0.9	0	23	23	23					12	11											23
IP064a		Allocation (SP2)	Land between Holywells Road and Holywells Park	B	1.2	0	66	66	0								33	33								66

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IP066	UC069	Allocation (SP2)	JJ Wilson, White Elm Street and land to rear at Cavendish Street	B	0.85	0	55	55	22						22	33											55
IP067a		Allocation (SP2)	Former British Energy site (north)	B	0.38	0	17	17	0														17			17	
IP074	16/01179	Full - expired (SP3)	Land at Upper Orwell Street	B	0.07	0	9	9	9				9													9	
IP080	UC085	Allocation (SP2)	240 Wherstead Road	B	0.49	0	27	27	0							27										27	
IP084a	18/01117	Full (S106) (SP3)	County Hall, St Helen's Street	B	0.32	0	40	40	40					40												40	
IP089	UC096	Allocation (SP2)	Waterworks Street	B	0.31	0	23	23	0													23				23	
IP096	19/00768 /FUL pending	Allocation (SP2)	Car Park Handford Rd East	B	0.22	0	22	22	22				22													22	
IP098	UC111	Allocation (SP2)	Transco, south of Patteson Road	B	0.57	0	62	62	0											30	32					62	
IP105	UC129	Allocation (SP2)	Depot, Beaconsfield Road	B	0.34	0	15	15	0									15								15	
IP106	18/00032 & 19/00045	Full - approved (SP3)	391 Bramford Road	G	0.33	0	11	11	11		11															11	
IP109	12/00192	Full (S106) (SP3)	The Drift, Woodbridge Road	B	0.42	0	6	6	6					6												6	

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IP116a	16/00659 19/00070 /FUL amends total to 51	Reserved Matters - approved (SP3)	Former St Clements Hospital, Foxhall Road	B	1.7	34	17	51	5	12	5															17	
IP116b	16/00677	Reserved Matters - approved (SP3)	St Clements Hospital Grounds, Foxhall Road	G	3.6	90	12	102	0	12																12	
IP116b		Reserved Matters - approved (SP3)	St Clements Hospital Grounds, Foxhall Road	B	3	60	17	77	0	17																17	
IP119		Allocation (SP2)	Land East of West End Road	B	0.61	0	28	28	0														28			28	
IP120b		Allocation (SP2)	Land West of West End Road	B	1.03	0	103	103	0													22	39	42			103
IP125		Allocation (SP2)	Corner of Hawke Road and Holbrook Road	B	0.25	0	24	24	24					24													24
IP131	18/00552	Full - approved (SP3)	45 Milton Street	B	0.28	0	9	9	9				9														9
IP132	10/00343	Allocation (SP2) (Full - expired)	Former St Peters Warehouse Site, 4 College Street / Bridge Street (Northern Quays west)	B	0.18	0	73	73	0									36	37								73
IP133	10/00418	Allocation (SP2) (Full - expired)	South of Felaw Street	B	0.37	0	45	45	0										45								45

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IP135	11/00247	Allocation (SP2) (Outline - expired)	112 - 116 Bramford Road	B	0.17	0	19	19	19						19												19
IP136	UC251	Allocation (SP2)	Silo, College Street	B	0.16	0	48	48	0											24	24						48
IP142	UC259 17/00570	Full - approved (SP3)	Land at Duke Street	B	0.39	0	44	44	44						44												44
IP143	17/00769	SP3 (Outline - approved)	Former Norsk Hydro Ltd, Sandyhill Lane	B	4.5	0	85	85	85				40	45													85
IP150a (part)	07/00765 part	Outline - approved (SP3)	Land south of Ravenswood (sites U, V and W)	B	2.23	0	96	96	96			50	46														96
IP150d		Allocation (SP2)	Land south of Ravenswood (Sports Park)	B	1.8	0	34	34	0									34									34
IP150e		Allocation (SP2)	Land south of Ravenswood	B	3.6	0	126	126	84					42	42	42											126
IP161	19/00065	Full - approved (SP3)	2 Park Road	B	0.35	0	14	14	14			14															14
IP165	17/00795	Full - approved (SP3)	Eastway Business Park, Europa Way	B	2.08	86	8	94	0	8																	8
IP169	15/00393	Full - approved (SP3)	23-25 Burrell Road	B	0.08	10	4	14	0	4																	4
IP172	UC088 08/00511	Allocation (SP2) (Full - expired)	15-19 St Margaret's Green	B	0.08	0	9	9	0								9										9

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IP188	19/00173	Full - approved (SP3)	Websters Saleyard site, Dock Street	B	0.11	0	9	9	9						9												9
IP200	17/00382 also 05/00819 11/00432 & 13/00346	Full - approved (SP3)	Griffin Wharf, Bath Street	B	4.7	131	71	202	35	36		35															71
IP205	02/01241 19/00624	Full - approved and S106 (SP3)	Burton's, College Street	B	0.1	71	9	80	9				9														9
IP206	04/00313	Full - approved (SP3)	Cranfields	B	0.71	196	124	320	0							42	42	40									124
IP206	16/00092 /VC	Full - approved (SP3)	Cranfields (Mill House)	B		33	10	43	0	10																	10
IP218	15/00422	Prior Approval - approved	31-37 St Helen's Street	B	0.4	12	3	15	3						3												3
IP221	06/01007	Allocation (SP2) (Full - expired)	Flying Horse PH, 4 Waterford Road	B	0.35	0	12	12	0												12						12
IP234	06/01176 19/00062	Full - approved & pending	Land adjacent 30 Gibbons Street	B	0.03	0	3	3	3				3														3
IP245	18/00899	Full - approved (SP3)	12-12a Arcade Street	B	0.06	0	14	14	14			14															14

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IP256	16/00987	Full - approved (SP3)	Artificial Hockey Pitch, Ipswich Sports Club, Henley Road	B	0.87	0	28	28	28				28														28
IP268	13/00625	Full - approved	Burlington Road	B	0.26	6	2	8	0	2																	2
IP274	16/00763	Full (S106) (SP3)	Old Norwich Road (rear of Maypole PH)	G	0.39	0	11	11	11			11															11
IP279a	18/00470	Prior Approval - approved (SP3)	Former British Telecom, Bibb Way	B	0.63	0	78	78	78			78															78
IP279b (1)		Allocation (SP2)	North of former British Telecom offices, Bibb Way fronting Handford Road	B	0.4	0	35	35	35				35														35
IP279b (2)		Allocation (SP2)	South of former British Telecom offices, Bibb Way	B	0.62	0	36	36	36					36													36
IP280	14/01039 & 17/00489 /VC	Full - approved (SP3)	Westerfield House, Humber Doucy Lane	B	0.06	0	7	7	7		7																7
IP280	18/00526	Outline - approved (SP3)	Westerfield House, Humber Doucy Lane	G	3.44	0	149	149	149				50	65	34												149
IP283	17/00049	Full - approved (SP3)	25 Grimwade Street. Student Union Club and adjacent car park, Rope Walk	B	0.27	0	14	14	14		14																14

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IP285 (part)	19/00737	Full approved	Land rear of 28 - 50 Freehold Road and 17 Kemball Street	G	0.16	0	5	5	5		5															5
IP290	17/00320	Full - approved	The Great White Horse Hotel, 45 Tavern Street	B	0.02	0	6	6	0							6										6
IP307		Allocation (SP2)	Prince of Wales Drive	B	0.27	0	12	12	12			12														12
IP309		Allocation (SP2)	Former Bridgeward Social Club, 68a Austin Street and land to rear	B	0.29	0	15	15	15					15												15
IP333	19/00325	Full approved	Land rear of 133 to 139 Valley Road	G	0.49	0	7	7	7			7														7
IP354		Allocation (SP2)	72 (Old Boatyard) Cullingham Road	B	0.34	0	24	24	24				24													24
IP355		Allocation (SP2)	77-79 Cullingham Road	B	0.06	0	6	6	6				6													6
IP358	18/00374	Prior Approval - approved	Saxon House, 1 Cromwell Square	B	0.07	0	34	34	34		34															34
IP360	18/00496	Prior Approval - approved	2 Turret Lane	B	0.1	0	6	6	0	6																6
IP361	18/00549	Prior Approval - approved	3-4 Lower Brook Mews	B	0.02	0	6	6	6		6															6
IP362	18/00675 19/00901	Prior Approval & Full - approved	39 Princes Street	B	0.03	0	15	15	15		15															15

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IP363	18/00685 19/00202	Prior Approval & Full – approved	Foundation House, 34 Foundation Street	B	0.1	0	14	14	0	14																14
IP364	18/01063	Full - approved	28-32 Museum Street	B	0.03	0	9	9	0	9																9
IP365	18/01070	Prior Approval – approved	15-17 Princes Street	B	0.05	0	14	14	14		14															14
IP366	19/00028	Full - approved	6 Lower Brook Street	B	0.03	0	8	8	8		8															8
IP371	18/00160	Full - approved	The Mason's Public House, 79 Victoria Street	B	0.06	0	8	8	8		8															8
IP383	19/00969	Full approved	Aaron House, Finchley Road IP4 2HU	B	0.17	0	5	5	5			5														5
IP386	19/01118	Full (S106) (SP3)	28-50 Grimwade Street	B	0.15	0	13	13	13			13														13
IP387	19/01119	Full pending	Lockup garages and amenity area adjacent 14 Emmanuel Close	B	0.07	0	6	6	6		6															6
IP388	19/01122	Full pending	Lockup garages rear of 70 to 84 Sheldrake Drive	B	0.24	0	8	8	8		8															8
IP389	19/01129	Full approved	Lockup garages rear of 32 to 40 Mallard Way	B	0.18	0	6	6	6		6															6
IP392	19/00159	Full approved	Highview Hotel, 56 Belstead Road IP2 8BE	B	0.19	0	8	8	8		8															8

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IP181	14/00638	Strategic Development Site (Outline approved)	Ipswich Garden Suburb Phase N1a (CBRE - West of Westerfield Road & south of Railway Line)	G	43.3	0	815	815	210				42	84	84	84	84	84	84	84	84	50	50	50	35		815
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	G	42.7	0	1,100	1,100	343			24	90	115	114	96	102	120	120	120	120	50	50	50	49		1,100
IP182 (part)		Strategic Development Site	Ipswich Garden Suburb Phase N3a (Mersea - East of Westerfield Road)	G	53.1	0	924	924	126					42	84	84	84	84	84	84	84	84	84	84	84	42	924
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)	G	25.6	0	456	456	0													72	96	96	96	96	456
ISPA 4.1		Allocation (ISPA4)	Humber Doucy Lane adjacent to Tuddenham Road	G	23.6	0	449	449	0													53	99	99	99	99	449
Various	Various		Sites with fewer than 5 dwellings	G	1.5	2	48	50	41	7	16	15	10														48
Various	Various		Sites with fewer than 5 dwellings	B	3.1	0	78	78	60	18	26	26	8														78
Windfall			Windfall sites	B		0	650	650	150				50	50	50	50	50	50	50	50	50	50	50	50	50	50	650

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Total						731	8,782	9,513	2,429	248	197	335	537	737	623	584	608	757	658	649	626	652	643	546	382	8,782

Trajectory note: this is the trajectory at 1st April 2020 with site capacities and timings updated to October 2020 for illustrative purposes, to reflect latest information from statements of common ground.