

MATTER 2 – Objectively Assessed Needs for Housing and Employment Land.

Q2.1. We continue to reply upon representations submitted at previous plan-making stages but wish to make the following additional comment:

- 2.1.1. Our representations express a concern about the age of evidence which supports the Council's OAN calculation. The SHMA dates from 2012 but is an update to a 2008 study. There have been significant changes in planning policy, economic circumstances and housing market circumstances since that time. Fundamentally, SMHA are no longer an appropriate tool for assessing need – in 2014 Practice Guidance introduced Strategic Housing and Economic Needs Assessments with relevant guidance on SHMAs withdrawn. Considerations such as market signals and new approaches to assessing affordable housing need were introduced as an integral part of the assessment process. It is not clear to us whether and how such changes have been considered in the plan making process and the evidence to support that.
- 2.1.2. The OAN derives from work published in 2013¹ and which does not take into account the 2012-based CLG household projections. This is a clear deficiency and is not consistent with Paragraph 015² of Planning Practice Guidance.
- 2.1.3. The 2013 published evidence does not account for market signals, and no reference is made to the need to consider market signals in the Housing topic paper³.
- 2.1.4. Turning to the substance of the issue – whether the 2012-based projections might lead to a materially different OAN figure –the 2012-based projections indicates a higher number of households now being forecast in 2021 (the last year for which both data sets make projections) compared with the 2011-based projections. This indicates that the 2021 projections would translate into a greater OAN over the full plan period.
- 2.1.5. It is widely recognised, however, that the 2012-based projections reflect recessionary trends (as was the case for the 2011-based projections). The comparison with the 2008-based projections indicate the potential for that to

¹ ICD08, Ipswich Housing Market Area Population and Household Projections, 2013, Luton Traded Services, Luton Borough Council

² (Reference ID: 2a-015-20140306)

³ LPCD38 Housing topic paper, October 2015

be a significant under-projection. Therefore, the 2012-based projections cannot be considered as setting the OAN, but rather be considered as a point from which further analysis must be undertaken, exactly in the way Practice Guidance describes. In the absence of that analysis, it cannot be determined that the Council's OAN is correctly set.

- 2.1.6. On the issue of affordable housing (the Inspector's question 2.1(e)) we respectfully suggest that ensuring that affordable housing provision is factored into the OAN is not the only issue relevant for delivery of affordable housing. Matters of viability and their influence on affordable housing targets and provision are also significant and must not be overlooked.

Q2.2. We have no further comment to make at this stage.

Q2.3. Noting the Inspector's express instruction that the soundness of the Ipswich Garden Suburb allocations will be considered at Stage 2 of the Examination, we wish to make the following comments:

- 2.3.1. Our clients control a significant proportion of land within the Ipswich Garden Suburb ('IGS') representing more than 50% of the overall supply in the IGS. Land to the south of the railway, west of Westerfield Road is owned by CBRE SPUK III (No.45) Ltd and is allocated under extant adopted Policy CS10. This land is the subject of a live planning application for up to 815 dwellings plus supporting land uses. Land to the south of the railway, east of Westerfield Road is substantially owned by Mersea Homes and is proposed to be allocated under the emerging Policy CS10. No planning application has been submitted for this land. This land has a potential capacity in the order of 1,092 dwellings together with supporting land uses.
- 2.3.2. Our clients have engaged collaboratively with other interests in the IGS and with the Borough and County Councils including in relation to the preparation of the interim Supplementary Planning Document⁴ and other emerging technical studies.
- 2.3.3. Our assessment of the likely delivery of land under our client's control is as follows:
- Land west of Westerfield Road is anticipated to commence delivery in 2018/19. We anticipate it could contribute around 175 dwellings to the

⁴ ICD55

five year housing land supply⁵. This is substantially below the 416 dwellings the Council considers⁶. We consider this land to be available now, suitable for development now, and be achievable within five years. We anticipate the site could contribute around 375 dwellings to the five to ten year housing land supply. The balance of 190 dwellings would contribute to the ten to fifteen year housing land supply.

- Land east of Westerfield Road is anticipated to commence delivery in 2021. We anticipate it would not contribute any dwellings to the five year housing land supply. We consider this land to be available now, suitable for development now but that it will take more than five years to realise development. We anticipate the site could contribute around 200 dwellings to the five to ten year housing land supply. The balance of around 892 dwellings would contribute to the ten to fifteen year housing land supply.

2.3.4. Turning to the wider supply question, we do not consider that an adequate supply of housing can be demonstrated for either the five year or five to ten year periods. Delivery rates in Ipswich were severely impacted by the recession and, in our view, continue to be hampered by the Council's inflexible approach to planning obligations. The protracted nature of progress in bringing forward land in the IGS – where unrealistic aspirations a lack of progress on resolving key strategic matters – has meant prolonged the determination of the first planning application. We have submitted representations on these matters and anticipate them being subject to discussion in Stage 2 of the Examination. It is pertinent to Stage 1 of the Examination, however, to note that viability has and remains a strong determinant of the market's ability to bring forward development in Ipswich, and the Council has not, in our view, responded to those circumstances. A less onerous policy stance on key aspects of the Plan and a more focused approach to enabling delivery would, in our view help to support both the five and ten year housing land supply positions.

Q2.4. We have no comment on this matter.

⁵ Taken to be the period 2016/17-2021/22. The Council conversely identifies in ICD03a the five year supply to run from 2015/16 to 2020/21.

⁶ ICD03a (page 61, first entry for site reference 'IGS') identifies the Council's trajectory for this site over the period to 2020/21 as being 416 dwellings in total.