

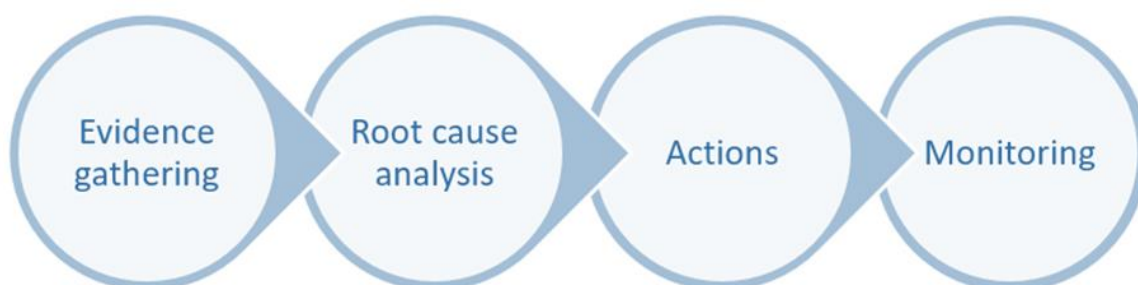


IPSWICH
BOROUGH COUNCIL

Supporting Technical Paper 2022

1. Introduction

1.1 This background technical paper has been prepared to support the Ipswich Borough Council Housing Delivery Action Plan 2022. The technical paper draws on a range of sources and collates relevant data on housing delivery. This is the first stage in the housing delivery action plan review process as shown in the diagram below. The data is analysed through the Housing Delivery Action Plan 2022.



Planning Service Performance Against National Indicators

Local Planning Authorities are measured on their performance based on the percentage of planning applications they determine within 8 or 13 weeks (or within an extension of time agreed with the applicant). For several years the targets have been as follows:

- Majors – 60% within 13 weeks; and
- Minors – 65% within 8 weeks, respectively.

Major development is defined as: 10 or more residential dwellings, dwellings on a site with an area of 0.5 hectares or more, 1,000 sq. m or more of new commercial floorspace or sites with an area of more than 1 hectare.

Minor development is defined as: Up to 9 residential dwellings, up to 999 sq. m of new floorspace and changes of use. In the last two years, Ipswich met these performance indicators.

In terms of the speed of processing planning applications in comparison with other local planning authorities, Ipswich Borough is an acknowledged high performer, consistently placed within the top 5% nationally.

Speed of Major Applications¹

Period	Number of major decisions at IBC	Number determined within 13 weeks	Number with a PPA, EoT, or EIA	Percentage of major determined within 13 weeks applications (including PPA, EoT or EIA)	Percentage of major applications determined in 13 weeks (excluding PPA, EoT or EIA)
Dec 2019 – Dec 2021	41	15	26	95.1%	95.1%
Dec 2018 - Dec 2020	47	18	29	97.9%	97.9%
Dec 2017 - Dec 2019	57	23	34	98.5%	40.4%

¹ Source – Table 151A Government Returns <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables>

Dec 2016 - Dec 2018	67	36	31	100%	46.9%
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Speed of Minor Applications ²

Period	Number of minor applications received at IBC	Number determined within 8 weeks	Number with a PPA, EoT or EIA	Percentage of minor applications determined in 8 weeks (including PPA, EoT or EIA)	Percentage of non-major applications determined within 8 weeks (excluding PPA EoT and EIA)
Dec 2019 – Dec 2021	1025	743	272	96.7%	96.7%
Dec 2018 - Dec 2020	1003	775	219	98.2%	98.2%
Dec 2017 - Dec 2019	1028	797	215	98.4%	77.5%
Dec 2016 - Dec 2018	1008	792	207	98.6%	N.A

PPA – planning Performance Agreement

EoT – Agreed Extension of Time

EIA – Environmental Impact Assessment applications

The Government has recently also been assessing Local Planning Authorities in terms of planning performance on the following criteria:

- The quality of decisions made by the authority on applications for major development; and
- The quality of decisions made by the authority on applications for non-major development.

² Source – Table 153 Government Returns <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables>

Quality of Major Application Decision Making

The measure used for assessing the quality of decisions is the percentage of planning applications refused, including those arising from a 'deemed refusal'³. In the 24 months to the end of June 2020, the Council had no major appeals and therefore no major appeals were granted consent⁴.

Quality of Minor Application Decision Making

In the 24 months to the end of Sept 2019 (the most available figures), the Council received 1,015 minor applications from which 25 appeals were received. Of the 25 appeals received three were granted consent⁵.

These statistics demonstrate the soundness of decision-making and that unsound decisions are not being made by the Council which could lead to unnecessary delays and costs to the delivery of new homes.

Speed of S106 Agreements

An analysis of applications with completed Section 106 agreements since 2015 showed a wide variation in time taken to complete from Planning & Development Committee resolution to approval.

50% of Section 106's in 2019 have been signed in 6 months or less. This is now improving through negotiating S106's for large applications alongside applications themselves. This is starting to improve S106 completion times.

³ where an application has not been determined - and the appeal was received by the Planning Inspectorate - within the statutory period, for major development that have been overturned at appeal, once nine months have elapsed following the end of the assessment period; as recorded in the data collected by the Ministry of Housing, Communities and Local Government and the Planning Inspectorate.

⁴ Source – Table 152 Government Returns <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables>

⁵ Source – Table 154 Government Returns <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables>

Planning Performance Against Local Targets

The performance of the development management function is measured and monitored via the Council's performance manager system.

The table below shows the key indicators that the Planning & Development Operations Manager will be responsible for delivering.

DM Performance Against Local Indicators

Indicator	2018/19 Actuals ⁶	2019/20 Actual	2020/21 Actual	2021/22 Actual	2021/22 Target	Direction of Travel
New homes built on previously developed land (%)	95%	86.9%	76.5%	86.1%	80%	Slight fall but in excess of Government expectations
Density (average) of new housing on major developments completed during the year (number per hectare)	45dph	76dph	35.7dph	47.1	40dph	Improving, although there was a fall in 2020/21

⁶ Need to update Actuals for 2017/18 when available

Indicator	2018/19 Actuals ⁶	2019/20 Actual	2020/21 Actual	2021/22 Actual	2021/22 Target	Direction of Travel
Net additional homes provided	121	421	322	166	445	Significant Improvement, although there was a dip in 2020/21 due to COVID lockdowns
Supply of ready to develop housing sites (%)	83%	104.2%	102.4%	100.9%	100%	Improving and at a rate above target
New Homes – number of affordable dwellings delivered from private developments	13	18	47	34 (24 Hanford Homes and IBC 10)	67%	Improving, but not yet meeting targets
Appeals against refusal of planning applications which are allowed (%)	50%	4.5%	16%	10%	10%	Significant Improvement from 2018/2019 levels

Indicator	2018/19 Actuals ⁶	2019/20 Actual	2020/21 Actual	2021/22 Actual	2021/22 Target	Direction of Travel
Major applications determined within the statutory timeframe (%)	100%	98.7%	93.75%	99%	90%	Reducing but in still in excess of Government expectations
Minor applications determined within 8 weeks (DOE codes 13-18) (%)	98%	97.9%	94.75%	99%	90%	Reducing but in excess of Government expectations
'Other' applications determined within 8 weeks (DOE Codes 19-27) (%)	99%	99%	98.5%	99%	90%	Level but in excess of Government expectations

Indicator	2018/19 Actuals ⁶	2019/20 Actual	2020/21 Actual	2021/22 Actual	2021/22 Target	Direction of Travel
Fully paperless/portal applications dealt with in paperless format %)	83%	100%	100%	100%	90%	Significant Improvement
Number of Listed Buildings "at risk" (grades 1-3) defined by Historic England	5	5	5	4	5	Level

The development management function is performing extremely well against local indicators. However, the Council will be reviewing the indicators to reflect the priorities arising from the Housing Delivery Action Plan.

Small Sites

An analysis of Ipswich’s planning approvals shows that approximately one third of housing delivery comes from smaller sites. Net completions have increased for the period 2021-22 to 52% of overall delivery.

Net completions (sites of 0-9 dwellings)

Year	Net completions	Expressed as a % of total delivery
2016-17	72	28%
2017-18	47	33%
2018-19	81	36%
2019-20	84	20%
2020-21	46	14%
2021-22	87	52%

Small sites can often be delivered relatively quickly, often without large upfront capital investment and can therefore make a significant cumulative contribution to overall annual housing completions, helping to supplement the increasing rates of housing delivery on large sites.

Because of their scale, size and complexity, larger sites can take a number of years to complete due to phasing, site constraints, infrastructure delivery timescales and market absorption issues.

The 2021 NPPF confirms the contribution that small and medium sized sites make, recognising their important contribution towards meeting the needs of an area because they can often be built out relatively quickly.

The NHBC carried out its own primary research into the challenges facing the development of small sites across the UK.

This report identifies the following as being the main factors affecting the growth of small house builders and developers nationwide:

- The planning process and associated costs – 38% of the companies surveyed ranked this as their most serious business challenge and 31%

ranked it as their second main challenge. This presents a more pessimistic view of the situation than in 2014.

- Availability and cost of viable land – 37% of the companies ranked this as their first and 34% as their second most serious business challenge. This factor has also become a more serious concern since 2014 and is particularly a challenge for small house builders and developers in England compared with other parts of the UK.
- Availability of finance – 20% of the companies regard this as their first and 18% as their second most serious business challenge. This situation has, however, improved since 2014, with reports of better relationships with banks and an increase in the use of private funding sources.

These are the issues for small house builders which will impact on delivery speed. Delivery speed will also be impacted by the legacy of the pandemic and the Borough is actively working with developers to address this. The impact of higher interest rates and cost of living including material cost and shortage of materials is likely to suppress delivery rates.

Whilst the cumulative impact of smaller sites can help delivery numbers, a significant number are required to come forward, and because of the scale of the development they largely avoid contribution to more essential social and transport infrastructure through S106's.

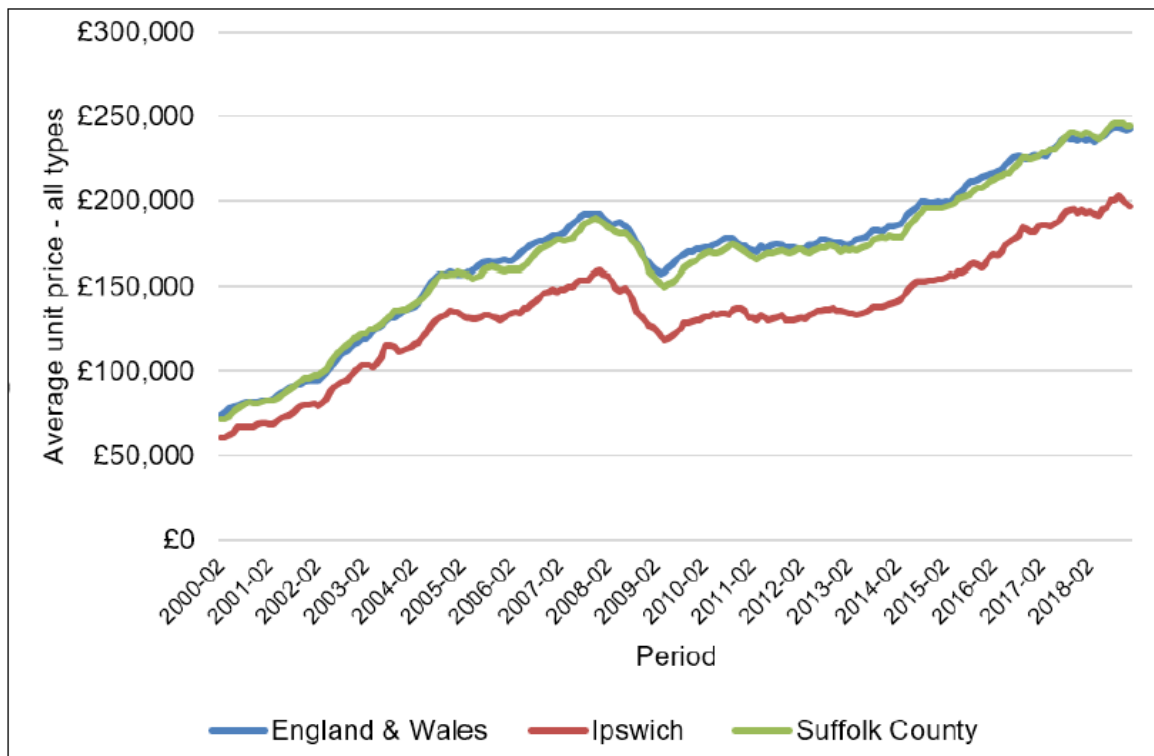
For example, the Council has a threshold of 15 dwellings for the provision of affordable housing. The requirement for affordable housing does not apply to developments composed of 65% or more flats on brownfield sites. This is because of viability issues and comparatively low land values and house prices in Ipswich. This means that even though small sites are important for delivery purposes and the local economy, the cumulative impact of these sites and in particular the impact on social infrastructure, is not being addressed.

Viability

Key data, relevant from the 'Whole Plan Viability Study' report is shown below.

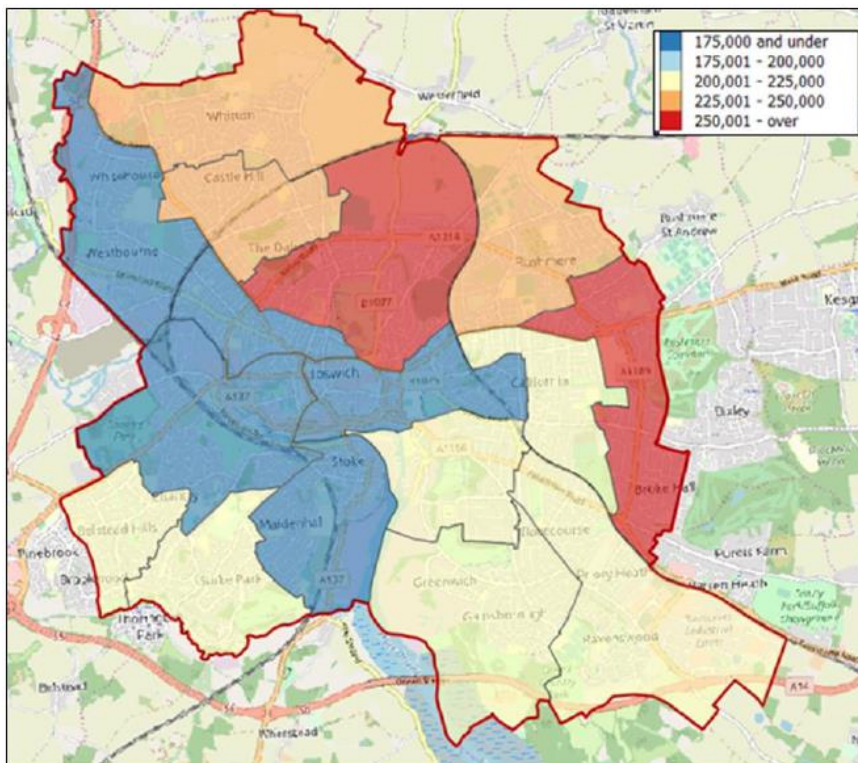
The graph below illustrates that Ipswich housing prices are consistently below the national and county averages, although they track the same trajectory.

Residential Market Overview

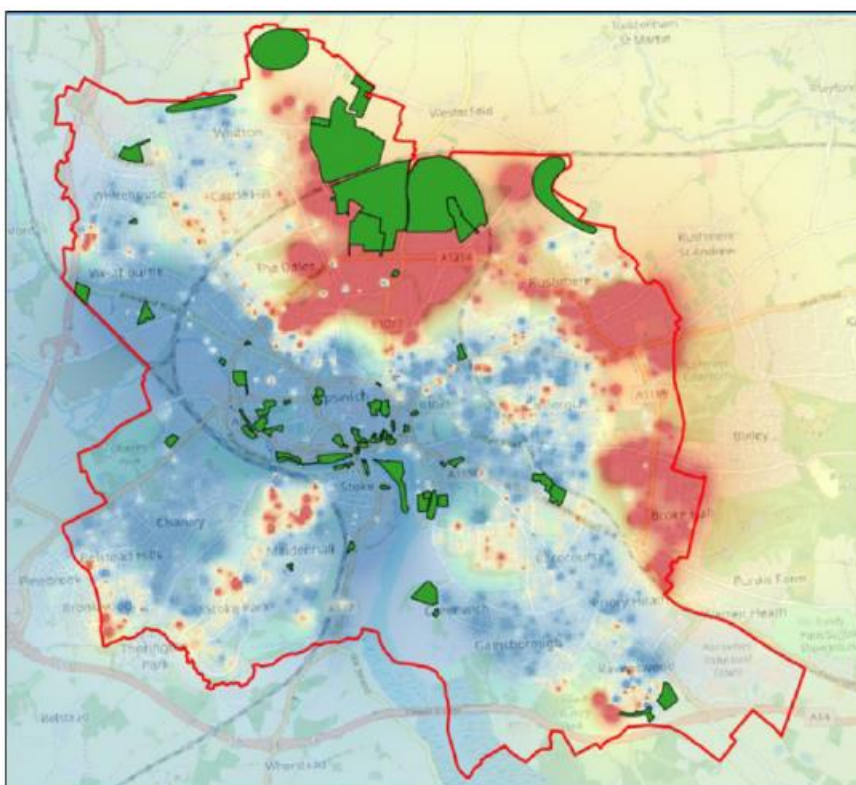


The maps overleaf illustrate that there is a wide variation in housing values across the Borough and indeed within wards. The heat maps show two things: areas where sale prices are likely to be higher; and the location of local plan allocations for the Borough in the adopted 2022 Ipswich Local Plan Review 2018-2036.

Ipswich Average Values by Ward



Ipswich Value Heat Map with SHELAA Sites



(Red - higher value areas on a price per dwelling basis, Blue - lower value areas on a price per dwelling basis)

The heat map above shows that a high number of the smaller sites are located where house prices are generally lowest. Part of the 'Vision' of the 2022 Ipswich Local Plan Review 2018-2036 is to regenerate the central area (IP-One Area) and the waterfront. These allocations are part of the delivery of this 'Vision'. However, many of these sites are highly constrained and difficult to deliver. The Council is investigating grant funding to help pump prime housing delivery issues in the 'cooler' parts of Ipswich where house prices are lowest.

There is a mismatch between the more desirable, easier to develop greenfield sites on the edge of Ipswich, which are more attractive to developers and those mainly brownfield harder to develop sites. However, the plan looks forward to 2036 and seeks to improve the built environment and viability in these 'cooler' areas. This is a more sustainable approach to delivery and is supported by the NPPF 2021 which supports redevelopment of brownfield land.

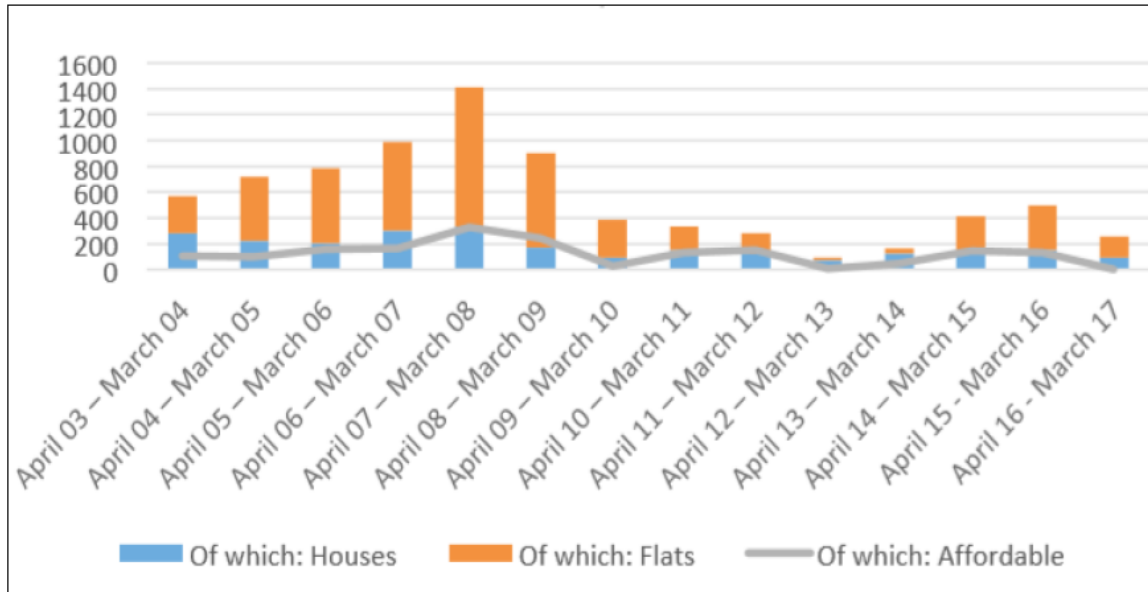
Ipswich Borough Council and Homes England are in regular and structured dialogue in relation to a number of stalled and proposed development sites. Currently Ipswich Borough Council and Homes England are jointly identifying where there is alignment between the Borough Council's priorities and Homes England's strategic priorities, framed by a shared aim to increase housing supply going forward. Discussion will include specific funding streams where applicable and available.

In addition, the Council is investing in public realm improvements and other improvements to the Town Centre and Waterfront areas and is a partner in the successful Towns Fund bid. The Government has agreed to provide up to £25m to help deliver 11 projects proposed by the Ipswich Town Deal Board. Schemes include 'Ipswich Oasis' - greening Ipswich Town Centre (£0.56m); a new cycle and footpath bridge linking the Island Site to the Waterfront (£1.31m); Local Shopping Parades Regeneration Fund (£7.96M); Town Centre Regeneration Fund (£7.96m) and creating a digital town centre (£2.34m) among other schemes. This should impact positively on the living environment of the key regeneration housing sites.

Tenure Mix

The graph below shows new build completions. Proportionally over time, the majority of new build homes have consistently been flats. These command a lower sale price in general as can be seen from the tables below and have a higher construction cost than houses.

New Build Completions



New Build Sold Prices

New Build Sold Prices Electric House, Lloyds Avenue and Ravens Place, Hawthorn Drive

Electric House, Lloyds Avenue, IP11

Typology	No-of-beds	No-of-sales	Average-unit-size-sqm	Average-price-per-unit	Average- <u>£psm</u>
Flat	2-bed	1	63	£185,000	£2,937
Flat	1-bed	1	49	£135,000	£2,755
Flat	N/a	4	54	£148,375	£2,735

Ravens Place, Hawthorn Drive, IP21

Typology	No-of-beds	No-of-sales	Average-unit-size-sqm	Average-price-per-unit	Average- <u>£psm</u>
Flat	2-bed	3	64	£126,667	£1,979
Flat	1-bed	2	50	£106,950	£2,139
Flat	N/a	13	61	£120,188	£1,978

NB – these figures are based on the last two years and are from the ‘Whole Plan Viability Study’ (January 2020 by Aspinall Verdi).

New Build Sold Prices Ribbans Park and The Mill House, College Street

Ribbans Park, IP3

Typology	No-of-beds	No-of-sales	Average-unit-size-sqm	Average-price-per-unit	Average- <u>£psm</u>
Detached	N/a	10	127	£400,422	£3,143
Semi-detached	N/a	29	103	£302,658	£2,925
Terraced	N/a	3	192	£485,717	£2,534
Flats	N/a	11	73	£215,545	£2,938

The Mill House, College Street IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average <u>£psm</u>
Flat	N/a	15	38	£142,167	£3,722

New Build Sold Prices Westport Place, Foundation Street and Alexander House, Fore Street

Westport Place, Foundation Street, IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average <u>£psm</u>
Flat	1-bed	3	55	£134,667	£2,463
Flat	N/a	7	45	£128,714	£2,888

Alexander House, Fore Street, IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average <u>£psm</u>
Flat	1-bed	1	58	£137,500	£2,371
Flat	N/a	3	65	£132,832	£2,044

New Build Sold Prices Wentworth House, Burrell Road and One-off Recorded Sales

Wentworth House, Burrell Road, IP2

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average <u>£psm</u>
Flat	N/a	4	55	£144,498	£2,651

One-off recorded sales

Typology	Sold Date	Address	Size sqm	Price Paid	Price <u>£psm</u>
Detached	24/03/2017	20, ELVEDON CLOSE, IP3 9WE	109	£272,995	£2,505
Detached	05/05/2017	1, DUNWICH CLOSE, IP3 9WF	177	£359,950	£2,034

Over recent years urban regeneration objectives have led the Council to focus development into central Ipswich (IP-One Area). This has supported the successful regeneration of the Waterfront, Education and Portman Quarters, introducing a greater range of uses into each, thereby adding to their diversity and vibrancy. This strategy has seen significant redevelopment of previously developed sites within the town. In 2020/21, 103(net) homes have been built in the IP-One area, the focus for regeneration which represents 32% of all homes built illustrating that this focus is successful.

One consequence however has been that the IP-One Area in the Local Plan is driving flat densities at 90 dph which represents a challenge to site viability, because flats sell at lower prices than houses. In addition, flat sale value is suppressing overall housing prices in Ipswich.

To help address this issue, the Council has identified a large area of greenfield housing in the north of Ipswich which is designed to rebalance the housing mix through the provision of around 3,500 homes. Policy CS10 (Ipswich Garden Suburb) identifies the development of an area of 195 ha of land now known as Ipswich Garden Suburb to form a key component of the supply of housing in Ipswich during the plan period. The Policy sets out land uses, with

neighbourhood areas to be delivered. The detailed strategic neighbourhood infrastructure requirements of the development are set out in Table 8B. The Ipswich Garden Suburb highlights the importance of a comprehensive development with the supporting social and transport related infrastructure to be developed in line with the Garden City principles. This site will help to rebalance the housing mix in Ipswich as it is built out and provide a source of well-planned larger family homes. The Council has also secured £9.8 million in Housing Infrastructure Funding (HIF) to support delivery of the development which will go towards upfront infrastructure on the site comprising a Country Park and two bridges across the railway line. This helps to demonstrate the Council's track record on securing grant aid.

Through the adopted 2022 Ipswich Local Plan Review 2018-2036, the Borough has also identified an area of land at the northern end of Humber Doucy Lane for 449 dwellings and associated infrastructure. The site will be jointly master planned along with the adjacent land allocation in East Suffolk District Council. This will provide the first cross-boundary approach to housing with neighbouring authorities.

The 'preferred approach' for housing land value outlined in the Planning Practice Guidance (PPG) is based on the existing use value (EUUV) and the 'land owner premium'. The 'premium' is the most challenging aspect to calculate. Uplift needs to be able to cover policy provision elements required. In determining 'premium' level the RICS 'general rule of thumb' is brownfield sites are valued at 10-30% of the original use value and agricultural land is likely to be 10-20 times the agricultural land value (in Ipswich this is closer to the 10 times agricultural value mark).

The Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment identifies the objectively assessed housing needs of the Borough for the plan period to 2036. This shows that by the end of the plan period the housing stock across the Ipswich Housing Market Area (HMA) should comprise 66.5% owner-occupied accommodation, 17.4% private rented homes, 1.3% shared ownership properties and 14.8% social rented/affordable.

The data shows that some 35.1% of new owner-occupied housing in the Ipswich HMA should be three-bedroom homes, 27.0% being two-bedroom dwellings, 28.7% should have four or more bedrooms and 9.2% one-bedroom accommodation. 7,282 private rented homes required within the Ipswich HMA, 33.3% should be two-bedroom properties with a further 25.8% should be three-

bedroom homes. Some 19.9% should be single bedroom accommodation and 21.0% should have four or more bedrooms.

The data indicates that of the 2,112 shared ownership dwellings required within the Ipswich HMA, 32.8% should be two-bedroom properties with a further 30.5% three-bedroom accommodation. Some 23.9% should have one bedroom and 12.8% should have four or more bedrooms.

The data shows that of the 5,420 additional affordable rented dwellings required within the Ipswich HMA over the next 22 years, 30.1% should have four bedrooms, 26.0% two bedrooms, 23.8% one bedroom and 20.1% three bedrooms.

The data above is being considered alongside the Ipswich Housing Register, which records acute housing need.

The adopted 2022 Local Plan continues to support higher densities where appropriate, but also alternative housing forms such as town houses with ground floor flats to deliver a wider range of housing mix to meet identified needs.

Site Constraints

In addition to the above, a number of sites in Ipswich are highly constrained, which increases the cost of development and inevitably reduces deliverability potential. Principally these issues are as follows:

Archaeology

Historic towns and cities often contain highly sensitive archaeological sites, where buried features, finds and standing monuments form a unique and irreplaceable record of a settlement's unwritten history. As a historic port, aspects of the archaeological record in Ipswich are nationally important.

However, Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time.

The wider Borough includes the medieval suburbs, later development of the docks, and significant earlier remains relating to the Prehistoric, Roman and Early Saxon contexts within which the town developed.

This results in high upfront development costs and mitigation for housing sites and allocations located in these sensitive areas and introduces an element of uncertainty which is affecting the interest shown by developers. These sites are often those with an active permission and or allocation in the local plan but are stalled.

To aid developers in Ipswich, the Council have produced a Development and Archaeology SPD which sets out the considerations and processes for the management of archaeological remains through the development process. The SPD is supported by the Ipswich Urban Archaeological Database which provides a complete record of all known archaeological finds and sites and helps to predict the likelihood of unrecorded assets being identified during development and reduces uncertainty for developers. This is the first time that the archaeological records for Ipswich have been combined and will provide extremely useful guidance for developers where archaeology exists and will help in assurances.

The Council is looking to secure funding to bring forward some of the most archaeologically sensitive sites. The Council can also consider whether any of these sites would be suitable for compulsory purchase which would have a positive impact on delivery.

Contamination

As a historic industrial area and port with river frontage, Ipswich has areas of ground contamination which need to be mitigated before sites can be developed for housing. Indeed, until contamination is examined it is impossible to ascertain suitability of the site for housing uses. This is another area of uncertainty for landowners and potential developers and is suppressing land values. These sites are not coming forward at the rate the Council needs to deliver the associated housing.

Flood Risk

Environment Agency investment in the Ipswich Tidal Barrier has had a significant positive effect on the potential of tidal flooding in the town centre and waterfront areas. This will facilitate sites coming online which were previously severely constrained through flood risk and now need only consider residual tidal flood risk in terms of ensuring that development is safe.

In June 2017, the Environment Agency engaged Mott McDonald to develop a new fluvial flood model for the River Gipping with updated hydrology and the inclusion of up to date climate change guidance. The River Gipping fluvial model work is now completed.

The Ipswich Strategic Flood Risk Assessment (SFRA) September 2020 has been published as a living document and reflects the new Gipping Fluvial Model findings. The Council’s Development and Flood Risk Supplementary Planning Document has been updated in the light of the new SFRA update and is about to be adopted. The documents address potential risks to development sites and identifies the need for fluvial flood risk management or mitigation measures.

Self-Build / Custom Build

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty on local authorities to keep a register of individuals and associations of individuals who wish to acquire plots of land on which to build their own home and to publicise that register. The Act also places a responsibility on councils to permission enough serviceable plots for self-build or custom build housing in order to meet this demand.

The Ipswich Self-Build and Custom Build Register has been running since March 2015. Demand is measured in ‘base periods’ that run from the start of the register until 30th October 2016 and then annually from 31st October until 30th October of each following year.

Demand by Base Period

Base Period	Demand
1	22
2	30
3	18
4	13
5	14
6	33
Total	130

Delivery by Base Period

Base Period	Delivery
2017-2018	5
2018-2019	15
2019-2020	32
2020-2021	3
Total	55

Between 2017 and 2019 the Council granted permission for a total of 20 serviced plots suitable for self-build or custom build development, 2 permissions short of the number required to meet the demand identified through the Self-build Custom Build Register.

During 2019/20 the Council granted planning permission for 32 serviced plots of land suitable for self-build custom build, two in excess of the number required to meet the demand identified through the register. This included 25 self-build/custom build plots at Ipswich Garden Suburb in the Henley Gate Neighbourhood, located between Henley Road and Westerfield Road. Outline Planning Permission was granted on 30 January 2020 on the Henley Gate Neighbourhood (application reference IP/16/00608/OUT). This granted Outline Permission for 1,100 dwellings alongside, a new primary school, a local centre comprising a mix of retail units and a new 30 ha country park with a visitor centre. This development will also include 25 self-build plots, a vehicular railway bridge and a pedestrian bridge.

Between 31st October 2020 and 30th October 2021, the Council did not grant sufficient suitable permissions for serviced plots to meet the demand identified through the register. The Council granted permission for 3 serviced plots which met the definition of self-build / custom build. This was against demand for 18 serviced plots, a shortfall of 83%. The 2020/21 base period coincided with the Coronavirus pandemic, which saw extended periods of lockdown and created uncertainty across the construction sector. Although the Council continued to process planning applications throughout the 2020/21 base period, the general uncertainty caused by the Coronavirus pandemic may have contributed to the decline in self-build custom build permissions.

The adopted 2022 Ipswich Borough Council Local Plan supports self-build and custom build development in the interest of delivering high quality homes. This

is also reflected in the adopted Ipswich Garden Suburb SPD which requires opportunities for self-build to be created within each of the Garden Suburb neighbourhoods and to date the Council has secured 25 self-build/custom build plots at Ipswich Garden Suburb.

The Council has strengthened its commitment to deliver self-build and custom build housing through the adopted 2022 Ipswich Local Plan 2018-2036 which requires major applications, to have regard to the level of demand on the Register.

Affordable Housing Delivery

This section outlines the Council’s approach in relation to accelerating supply of affordable housing in Ipswich.

In total there are approximately 60,810 dwellings in Ipswich. 47,620 of these are in the private ownership. 8,040 (sheltered and general needs) are owned by IBC. The remainder are other public sector and private registered providers.⁷

Monitoring data gathered by the Council in the table below and overleaf, demonstrates the levels of affordable housing completions in the Borough.

Ipswich Affordable Housing Completions 2005/6 to 2021/22

Period	Net Completions	Expressed as a % of Total Delivery
2005-06	156	20
2006-07	163	17
2007-08	329	23
2008-09	245	27
2009-10	26	7
2010-11	135	40
2011-12	152	54
2012-13	7	7
2013-14	44	19.3

⁷ Table 100; number of dwellings by tenure and district, England. Gov.uk.

2014-15	202	43
2015-16	133	26.8
2016-17	4	1.6
2017-18	20	14.2
2018-19	9	4.1
2019-20	35	8.3
2020-21	47	15
2021-22	34	20.5

Affordable housing completions for the past three monitoring years have been relatively low compared to previous years. This suggests that the deliverability of affordable housing through recent developments has been unable to meet the identified need.

The table shows a ten-year average provision of affordable housing of 19% of all completions 2011-2021, but year on year completions vary according to the nature of the developments taking place. This is controlled through the market and, in many developer-led schemes, is affected adversely by viability issues.

In the context of Ipswich, and the Ipswich Housing Market Area, the gap between affordable rent and market entry rent is smaller than the gap between market entry rent and entry level home ownership. The gaps for four-bedroom accommodation are particularly large. The notable gap recorded between affordable rents and market entry rents for most dwelling sizes indicates that intermediate housing could potentially be useful for a large number of households. The very large gap between market entry rents and market entry purchase in all cases indicates notable potential demand for part-ownership products for households to address this gap.

Policy CS12 (Affordable Housing) sets out a requirement for new developments of 15 dwellings or more (or on sites of 0.5ha or more) to provide for at least 15% on-site affordable housing by number of dwellings. The requirement for affordable housing does not apply to developments composed of 65% or more flats on brownfield sites. Policy CS10 (Ipswich Garden Suburb) seeks an overall target of 31% affordable housing at Ipswich Garden Suburb and Policy ISPA 4

(Northern End of Humber Doucy Lane) seeks 30% affordable housing at the northern end of Humber Doucy Lane.

To help address the need for affordable housing delivery, the Council is being pro-active in building its own affordable housing (across 20+ sites in the Borough). Whereas market housing schemes can be expected to deliver 15-30% affordable housing on site, sites forming part of the Council's land holding are expected to deliver 70-100% affordable housing. To date the Council through Ipserv/Handford Homes has delivered 224 affordable homes, with another 16 due to be delivered later in the year. The Borough has an aspiration to develop 1000 new affordable homes within a decade. Moreover, the Council is also investing a further £11 million in improving its existing housing stock. However, in order to properly address social rent needs, external funding is needed. The Council also has an active programme of returning empty homes to use. In 2021-2022 April 1 to March 31st Ipswich Borough Council returned 21 empty homes to use.

Housing Monitoring

During the course of producing the Housing Delivery Action Plan, the Council has recognised that housing monitoring requires more investment. To address this issue the Council has recently employed an Infrastructure Assistant Planning Officer to monitor Section 106 agreements and to provide housing monitoring assistance.

Under the terms of The Community Infrastructure Levy (Amendment) (England) (No.2) Regulations 2019 there is a requirement to publish an Infrastructure Funding Statement annually. The Infrastructure Funding Statement provides information on the monetary (and non-monetary) contributions sought and received from developers for the provision of infrastructure to support development in Ipswich including affordable housing provision and contributions. The document is available via the [Section 106 Agreements](#) page.

Strategic Housing and Employment Land Availability Assessment (SHELAA) Findings

The Council undertook a 'call for sites' in the autumn of 2017 as part of the early preparation stage for the adopted 2022 Ipswich Borough Council Local Plan Review. The SHELAA is an assessment of development potential of the sites and those considered deliverable were taken forward in the emerging plan. These processes resulted in an additional four housing development sites being identified.

New Housing Site Allocation Identified through the Ipswich SHELAA and 'Call for Sites' exercises

Site Ref	Site Address	Net Increase (no. of dwellings)
IP309	68A Austin Street	12
IP354	72 (Old Boatyard) Cullingham Road	24
IP355	77-79 Cullingham Road	6
IP125	Corner of Hawke Road/ Holbrook Road	15

Empty Homes

The Council's Housing Strategy aims to promote the best use of Ipswich's current housing stock, whatever the tenure, to provide quality housing for all.

The Council has an Empty Homes Policy to bring empty homes back into use. It aims to target all houses that have been vacant for longer than six months, and, in special circumstances, houses that have been vacant for less than six months, for example where an enforcement notice is outstanding.

Empty homes are identified through the Council Tax Register and the Empty Property Database. Because of the unique circumstances that cause a property to be empty, in order to determine the most appropriate course of action the Council will carry out a Cost Benefit Analysis prior to any enforcement action being taken. This analysis will determine whether the resources required, both financial and people, justify the end result.

In order to ensure consistency and promote information sharing, an action group has been established made up of council officers from the following council departments:

- Private Sector Housing;
- Council Tax;
- Development Management;
- Planning Policy;
- Legal services;
- Housing Advisory Services;
- Economic Development and Property.

This action group meets at least every six months to discuss general issues and identify action to take for particular properties.

Portfolio Holder Councillors from Housing and Environmental services are also invited to attend these meetings.

The number of empty homes increased in 2020 and 2021 due to the Covid-19 Pandemic and at the same time to number of long-term empty properties bought back into use decreased. Private Sector Housing continue to provide help and advice in the form of discounted estate agent fees, helping to return properties back to use or sell them. Should owners not engage with the process after several attempts, Private Sector Housing will look to proceed with more formal action.

Empty Homes⁸

	2013	2014	2015	2016	2017	2018	2019	2020	2021
All vacant dwellings	1483	1365	1430	1223	1215	1343	1371	1553	1539
All long-term vacant dwellings	461	421	482	388	362	368	344	574	495
Local Authority Vacant dwellings	27	40	29	31	34	42	39	79	157
PRP vacant general needs dwellings	46	71	53	36	42	34	40	32	44

⁸ Figures obtained from Table 615; vacant dwellings by Local Authority District
<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

PRP long term vacant general needs dwellings	18	36	17	17	28	20	28	13	28
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Private Sector Housing: HMO Inspections and Empty Properties Bought Back into Use⁹

	HMO Inspections	Long Term Empty Properties Bought Back into Use
1 st April 2015 – 31 st March 2016	49	50
1 st April 2016 – 31 st March 2017	189	50
1 st April 2017 – 31 st March 2018	170	52
1 st April 2018 – 31 st March 2019	76	49
1 st April 2019 – 31 st March 2020	66	40
1 st April 2020 – 31 st March 2021	8 (reduced due to Covid)	6 (reduced due to Covid)
1 st April 2021 – 31 st March 2022	Unknown	21

Infrastructure and Housing Funding

The Council has been working with Homes England directly since 2020 to identify future grant funding opportunities for the town's brownfield sites in order to aid delivery rates. Homes England have undertaken some internal reorganisation and has placed Ipswich in the 'Emerging and Developing Markets' bracket along with similar urban and coastal towns with similar profiles.

Homes England have been engaging with Ipswich Borough Council to look at specific funding available through the Local Government Capacity Centre pilot. Ipswich Borough Council and Homes England are in regular and structured dialogue in relation to a number of stalled and proposed development sites.

⁹ Source – Ipswich Private Sector Housing

Currently we are jointly identifying where there is alignment between the Borough Council's priorities and Homes England's strategic priorities, framed by a shared aim to increase housing supply going forward. Discussion will include specific funding streams where applicable and available. A number of workshops have been undertaken to explore the problems with town centre brownfield delivery.

The next stage of work is to be agreed and will result in the co-creation of a business case for the technical and financial resourcing of a pipeline of brownfield sites through to the point of delivery, including identifying sources of the required resources.

IBC considers the delivery of these sites with the aid of resource funding from Homes England as a fundamental issue that will help to deliver the housing need identified in the Ipswich Local Plan 2018-2036.

Ipswich Borough Council has been allocated nearly £10 million in government funding to support the delivery of the 3,500 home Ipswich Garden Suburb development.

The money, from the Housing Infrastructure Fund, will go towards the upfront costs of the strategic infrastructure on the site such as the country park and bridges across the railway line.

Ipswich Garden Suburb will also see new schools, a district shopping centre and community facilities provided between Henley Road and Tuddenham Road.

The Council continues to liaise with the owners and developers of the site on planning and viability matters through the Ipswich Garden Suburb Delivery Board.