



IPSWICH
BOROUGH COUNCIL

Ipswich Borough Council Housing Delivery Action Plan 2021

Foreword

In 2017 the Council published its Corporate Plan, which identified 'building quality and affordable homes for Ipswich people' as one of three top priorities for the borough.

The Council has a target of delivering around 10,000 new homes by 2031 and is keen to widen the range of homes, in order to improve the prosperity of the town.

The town planning function is a key driver for improving housing delivery, along with the property, housing, and environmental health functions, which together, can bring about a significant positive change to housing delivery in Ipswich.

This Housing Delivery Action Plan describes the challenges facing the Council in terms of housing delivery and sets out a clear path to address them.

We look forward to working with partners in implementing this plan and delivering new homes for the people of Ipswich.



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Ipswich the Place

Ipswich is the county town of Suffolk and performs a regional role in terms of its population, in delivering growth and how it functions as a major employment, shopping and service centre, and hub for transportation.

The town has a well-connected transport network. Train services provide good and regular access to London (in around 60 minutes) and direct links to Norwich, Cambridge and Peterborough. Ipswich is also closely connected to the trunk road network with the A12 providing access to London, the M25 and Stansted Airport and the A14, linking Ipswich to the Midlands and the Port of Felixstowe.

The population of Ipswich is younger than the county, regional and national averages. The largest age group in Ipswich is the 25-34 year olds (15.9%). In addition, 23.8% are aged 14 or under. Conversely, only 13.3% of the Ipswich population is aged over 65 years.

Ipswich's history is rich as a port and, in recent years, its Waterfront has been transformed to include hotels, the University campus, the Jerwood Dance house, a range of bars and Cafés and high-quality residential apartments.

Ipswich is a compact town. Nowhere is further than 4 miles from the town centre. It is also a town on a human scale, which lends itself to walking and cycling.

Ipswich is developing dynamically and prosperously and has strong prospects for growth. This growth is supported at a central, sub-regional and local government level, enabling Ipswich to develop while acknowledging the sense of place established by many historic buildings and its large landscaped parks.

Christchurch Park provides one of the largest green spaces in any UK urban centre, and together with the numerous other beautiful parks and open spaces, contributes significantly to the setting of the town. Other attractions include the many historic buildings and numerous theatres, with Ipswich enjoying more National Portfolio Organisations (NPOs) than any other location outside of London.

Beyond, the Suffolk boasts a splendid rural backdrop, including a renowned coastal region, Dedham Vale and the mid-Suffolk area, with strong links to Gainsborough and 'Constable Country'.

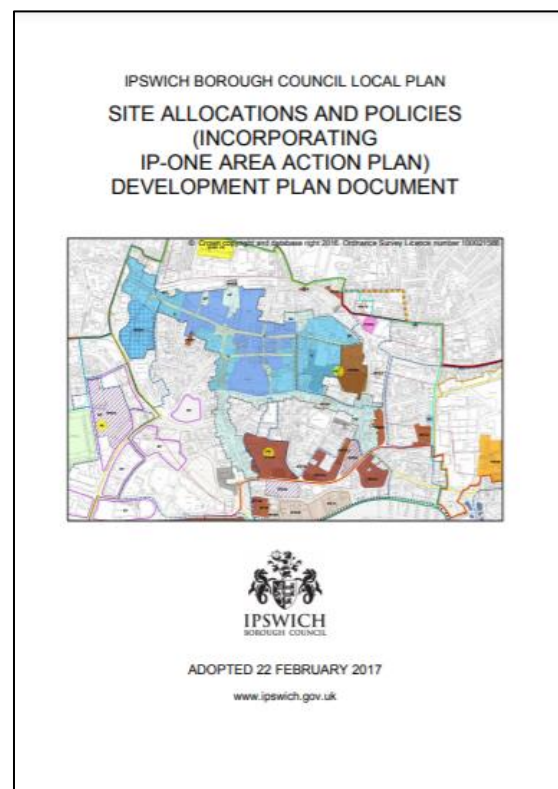
Local Planning in Ipswich

Ipswich Borough Council is finalising its third Local Plan in under ten years. The Local Plan looks forward 15 years and allocates land for future housing and employment growth, along with planning for infrastructure to support it. The local plan also has a function to provide the spatial delivery of all corporate plans and strategies.

The latest Ipswich Local Plan was adopted in February 2017 and the emerging Local Plan is now in its final stages of adoption.

The Ipswich Local Plan plans the delivery of 9,777 new homes by 2031, 15% of which should be affordable homes. This includes around 3,500 new homes at Ipswich Garden Suburb and includes associated infrastructure, such as a new 24.5ha country park on the northern edge of Ipswich.

Outside of the Ipswich Garden Suburb the focus of new housing is within the central area of the Town.



Housing Delivery in Ipswich

Much of the recent development in the town has been focused around the central area of Ipswich. Ipswich Waterfront is the location for the largest single regeneration project in the East of England and the focus of significant commercial, cultural and institutional investment.

Whilst Ipswich has seen quality housing delivered across the Borough, the housing market has not delivered the scale of housing needed.

The purpose of this document is to identify what steps the Council needs to take in order to assist with delivering sufficient number and quality of new homes for all. This report examines the current state of play; exploring the challenges and opportunities to build the scale of housing needed in Ipswich.

The Council recognises that it plays a significant role in driving the delivery of new homes. It is committed to making a significant contribution itself both to housing delivery and to the public realm.

The 2020 Housing Delivery Test Measurement (covering the previous three financial years) demonstrated that Ipswich had delivered 64% against its housing delivery target, which means that the authority has to:

- publish an action plan;
- add a 20% buffer onto its 5-year land supply, and
- apply the presumption in favour of sustainable development.

This is the first year that the Council has had to apply the 'presumption' in favour of sustainable development.

The Council has an excellent record of making timely and good decisions. For 2020/2021, 97% of all planning applications were determined within time, and 83% of all planning appeals were dismissed. 92% of all decisions were approvals, which illustrates the pro-active and positive attitude of the Council.

There are however some things that are beyond the control of the Local Planning Authority, for example the lack of power to properly incentivise the implementation of planning permissions when they are granted. For example, on the 1st April 2021 there were approximately 2,776 dwellings in Ipswich with permission which had not commenced.

Housing Delivery Test

The Housing Delivery Test measures net additional dwellings provided in a local authority area against the homes required to meet local need. The current housing delivery test covers the period between 2017 and 2020.

Where delivery falls below the homes required, policies set out in the National Planning Policy Framework (NPPF) will apply.

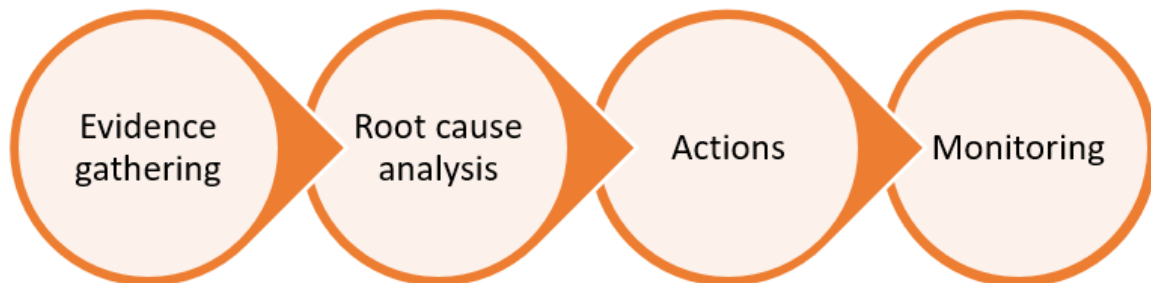
The consequences apply concurrently, for example, those who fall below 85% should produce an Action Plan as well as the 20% buffer. The consequences will continue to apply until the subsequent housing delivery test measurement is published the following year.

All local planning authorities with less than 95% of the delivery target must prepare an action plan.

An action plan is intended to be a practical document focussed on effective measures aimed at improving housing delivery in an area and needs to be underpinned by evidence and research.



Evidence and Root Cause Analysis



The action plan process is shown in the diagram above and requires local authorities to understand why delivery in their area is below government expectations.

A range of data sources have been analysed to identify the main local issues and challenges influencing delivery rates. The action plan is supported by a background technical paper which collates the relevant data.

Based on the data collected and analysed the Council considers that the main barriers to delivery are as follows:

- The tight, compact urban nature of the borough;
- Higher cost of development and lower land values;

- Low private sector delivery levels of affordable housing;
- The inability of the Local Planning Authority to incentivise delivery of housing, or sanction non-delivery;
- Reliance on brownfield sites; and
- Greenfield sites, which offer fewer constraints, sit outside of Borough boundary.

Key Actions

Through a 'root cause analysis' the Council has identified the main local issues and challenges influencing housing delivery rates. These issues have been used as the basis to evolve actions to boost delivery.

The actions have been devised as part of a collaborative process between key stakeholders including senior staff from the Planning, Property, Private Sector Housing, Tenancy Services and Environmental Health service areas.

The actions comprise a range of short, medium and long-term actions, to help provide immediate improvements to delivery, but also help with long-term planning for growth.



1

Support Private Sector Affordable Housing Provision

1. Support Private Sector Affordable Housing Provision

The Council is committed to increasing the delivery of affordable homes in the Borough. It is keen to see the private sector play its parts in meeting affordable housing need.

The Council is progressing a programme of affordable housing and has plans to build 1,000 new homes in a decade. Furthermore, the Council has invested £11 million in improving its existing housing stock. All of the Ipswich Borough Council homes meet the Decent Homes Standard and enhanced Ipswich Standard.

Working with the private sector is key to accelerating the supply of affordable housing in Ipswich. The Council can outline the necessary housing mix and bedroom numbers required for a particular site to best meet local waiting list demand.

Planning officers can highlight sites to housing service colleagues so they can work in partnership with private developers to help better deliver affordable housing. This work is supported through the Ipswich Housing Strategy 2019-2024.

Finally, the Council is committed to ensuring it has the resources in place to deliver affordable homes. The Council will therefore explore the capacity and resource to strengthening its partnership role.

Actions

- **Improve partnership working to ensure better private sector delivery of affordable housing (short-term).**
 - **Explore capacity and resource to strengthen the enabling role within the Council (medium-term).**
-

2

Work with Neighbouring Authorities to Deliver New Homes

2. Work with Neighbouring Authorities to Deliver New Homes

The Council recognises that Ipswich is tightly bounded and by working in partnership with its neighbouring authorities (Babergh & Mid Suffolk Councils, East Suffolk Council and Suffolk County Council), it can, in the future, identify land strategically to deliver housing.

The four authorities have a demonstrable history of working together on strategic planning issues through the Ipswich Strategic Planning Area Board (ISPA Board).

Ipswich Borough Council is currently working collaboratively with East Suffolk Council to masterplan and deliver residential development and associated infrastructure on land at the North of Humber Doucy Lane, on the eastern side of Ipswich. The development will deliver around 450 new homes in Ipswich and a further 150 in East Suffolk, with cross boundary infrastructure provision.

The Council is committed to continuing this work with adjoining authorities through the ISPA Board, in order to develop a sustainable approach to housing delivery beyond the borough boundary.

The Council will continue to work closely with ISPA authorities to deliver housing jointly for the Ipswich Housing Market Area and progress all opportunities collaboratively as necessary.

Action

- **Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure (ongoing).**
-

3

Monitor and Bid for Infrastructure and Housing Funding

3. Monitor and Bid for Infrastructure and Housing Funding

The Council will take advantage of all relevant funding opportunities to support the delivery of new housing and infrastructure to support housing delivery.

The Council already has a proven track record of securing appropriate investment.

In February 2018, Ipswich Borough Council successfully bid for £9.8 million from the Housing Infrastructure Fund (HIF) to facilitate the delivery of 3,500 homes at Ipswich Garden Suburb (IGS). IGS is a strategically important site and will contribute significantly (36%) in meeting the borough's housing need up to 2036. The HIF monies are to be put towards the delivery of new infrastructure at the site, which comprises of a 24.5 hectare country park and two bridges across a main railway line.

In March 2021 Ipswich was successful in its bid for £25 million from the government's Towns Fund. This fund will assist with the delivery of 11 projects planned for Ipswich town centre, including a new pedestrian and

cycle bridge at the Waterfront and the restoration of various buildings, including the Old Post Office on the Cornhill. The Strategy will kick start regeneration of key development sites and encourage inward investment. It is expected that the delivery of many of these projects will start during 2021/22, with most completed by the end of 2022/23. An indicative programme is set out within paragraph 29 of the Ipswich Town Investment Plan, which can be viewed on the Council's website.

The Council recognises that parts of Ipswich have viability issues arising from high and abnormal development costs and may benefit from upfront funding, and/or other funded support to accelerate the release of land for housing. The Council will seek to bid for funding opportunities which provide upfront capital to facilitate the delivery of new homes.

Action

- **Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital (ongoing).**
-

4

Bringing Empty Homes Back into Use.

4. Bringing Empty Homes Back into Use.

An important part of the Council's wider housing strategy is to tackle long term empty homes.

Increasing the number of empty homes bought back into use increases the overall supply of new housing and reduces blight on neighbourhoods. The Council's Empty Homes Policy aims to reduce the number of long-term empty homes in Ipswich returning homes back into use and discouraging owners from leaving properties empty. The objectives of the policy are to provide advice and assistance, where possible to those wishing to bring empty homes back into use and where necessary, use appropriate enforcement action to return the property to use.

The Council has an excellent track record of bringing empty homes back into use and has a dedicated officer responsible for working with the owners of properties left unoccupied for extended periods. Through the Council's Empty Homes Policy, the number of long-term empty homes has fallen from 941 in 2008 to 368 in 2018.

In 2017/18 Ipswich's Private Sector Housing Team assisted in bringing 52 long term empty properties back into use.

The Council's annual target for restoring empty homes back into use is 50. This is 10% of the estimated number of long-term empty properties in Ipswich. Based on previous results, it is expected that the majority (80%) of empty homes will be brought back to use as a result of encouragement letters sent to owners. It is expected that 10% will be brought back into use via grants and 10% via enforcement action.

In previous years the Council has exceeded its target for restoring the number of empty homes back into use, increasing the overall supply of new sustainable homes.

Action

- **Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 empty homes back into use (ongoing).**
-

5

Work with Small and Medium Sized Builders to Facilitate the Delivery of New Homes

5. Work with Small and Medium-Sized Builders (SMEs) to Facilitate the Delivery of New Homes

Currently, approximately one third of all new homes in Ipswich are delivered on smaller sites of between one and ten dwellings. The majority of these sites are developed by small and medium sized developers who play a critical role in helping to meet our housing need.

Small sites are important to the Council's overall housing supply as they typically build out more quickly and provide additional choice in the type and design of housing.

The Council aims to boost opportunities for small and medium sized house builders by providing a dedicated list of small sites (suitable for 10 units or less). The sites register will include details of the site constraints to help reduce the development risks.

The Council's own housing sites will look to make use of small and medium sized local businesses as appropriate, to build out their own smaller development sites.

Action

- **Create a small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders (short-term).**
 - **Support our Housebuilding Company, Handford Homes, to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing (short to medium-term).**
 - **Engage with developers to progress those sites which have consent but have not commenced on site (medium to long-term)**
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6

Review S106 Procedures for Housing Applications

6. Review Section 106 Procedures for Housing Applications

Section 106 of the Town and Country Planning Act is the Council's preferred approach to securing high-quality mitigation to make proposals acceptable.

The Council recognises the importance of timely negotiation and agreement of developer contributions and is working to reduce the time taken to complete Section 106 Agreements by carrying out preparation of draft agreements alongside planning application processing, thus accelerating the decision making process.

Going forward, the Council will encourage engagement at the pre-application stage (see Action 7) of the planning process so that issues are resolved, and a package of obligations are agreed in principle with the applicant before the planning application is considered. This will provide greater certainty for developers and greater transparency to the local community.

The Council will work to ensure that affordable housing is provided through S106 Agreements to reflect the Council's corporate housing priority.

The Council will also prepare a standardised template Section 106 Agreement. The template will be published online so applicants are clear about the documentation they are required to provide as part of the planning application process.

Finally, the Council is committed to ensuring it has the resources in place to agree, process and monitor planning obligations under (Section 106 Agreements). The Council will seek to recruit a dedicated officer to support the delivery of planning services.

Actions

- **Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions (short-term).**
 - **Prepare and publish a standardised template Section 106 Agreement (short-term).**
 - **Recruit a dedicated officer to support Section 106 Agreement progression and monitoring (short-term).**
 - **Work collaboratively with SCC regarding S106s - to progress agreements more quickly and clearly, and to ensure that requested contributions are fully justified and viable (Short – Medium term).**
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7

Promote Use of the Pre-applications Service

7. Promote Use of the Pre-applications Service

Pre-application

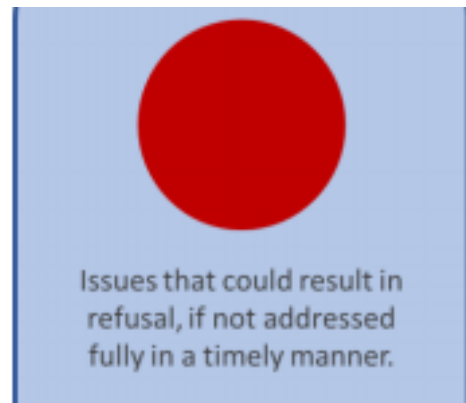
Ipswich Borough Council is committed to improving its pre-application advice process. The main aim is to simplify the process and focus on issues essential to securing planning permission.

The Council intends to review its pre-application procedures and introduce a traffic light assessment format for pre-application feedback. Issues discussed at pre-application will be rated as red (issues that could result in refusal), amber (issues that require further information or clarification) and green (issues that are resolved or agreed). This enables the main messages to be communicated clearly. The Council will also look to clarify the next stages, creating a clearer route map for applicants.

The greater focus on resolving issues from the beginning will improve the quality of applications. This will also lead to a more efficient and timely application process.

Actions

- Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants (short-term).
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8

Review Application Procedures

8. Review Application Procedures

The Council is committed to delivering efficient and high-quality development management services.

The Council has recently acquired work flow software. This technology has helped to increase business efficiency and productivity.

The greater focus on identifying and resolving issues will lead to a more efficient and a timely planning application process.

The Council has also committed to a full review of its Local Validation List. In order for applications to be assessed effectively and expeditiously, it is important that local validation requirements are met. Updating the Local Validation List will provide applicants with greater certainty about the application process.

It will also improve the quality and detail of application submissions, allowing applications to be assessed effectively, expeditiously and with full transparency.

Actions

- **Review the Local Validation List to enable applications to be assessed effectively and expeditiously (short-term).**
 - **Use Enterprise software to increase business efficiency and productivity (short-term).**
-

9

Place Marketing and Promotion to
Stimulate and Grow Market Interest

9. Place Marketing and Promotion to Stimulate and Grow Market Interest

There is a need to encourage developers and investors into Ipswich to increase the quantity of housing being delivered.

The Council will undertake a more coordinated and corporate approach to place marketing. Place marketing and promotion will be used to actively promote Ipswich and its key development locations to stimulate market interest and consumer demand.

Place marketing will stress that there has never been a better time to invest in Ipswich. It will set out the unique selling points of the town, including its heritage assets, the Waterfront, the fact that it has a well-connected transport network with train services providing access into London in just over an hour and links to Norwich, Cambridge and Peterborough.

It will emphasise that Ipswich Borough Council is keen to work with housebuilders and developers to deliver the homes required.

Place marketing and promotion will be backed up with continued efforts to de-risk development in less viable locations, through the provision of gap funding and infrastructure investment to remove as many abnormal costs as possible.

Actions

- **Investigate opportunities to work with partners to market the town (short-term to medium-term).**
 - **Provide an ‘opportunities map’ of key development sites in priority areas for growth (linked to the Local Plan) (short-term).**
-

Implementation

The actions comprise a range of short, medium and long-term actions, to help provide immediate improvements to delivery, but also help with long-term planning for growth.

Actions	Timeframe for Implementation
<ul style="list-style-type: none"> ▪ Improve partnership working to ensure better private sector delivery of affordable housing. 	Short-term
<ul style="list-style-type: none"> ▪ Explore capacity and resource to strengthen the enabling role within the Council. 	Medium-term
<ul style="list-style-type: none"> ▪ Work with neighbouring authorities to identify strategic sites to bring forward new housing development and associated infrastructure. 	Ongoing
<ul style="list-style-type: none"> ▪ Continue to bid for infrastructure funding to facilitate the delivery of new homes, with a particular focus on securing funding which provides upfront capital. 	Ongoing
<ul style="list-style-type: none"> ▪ Continue to work with the owners of homes left vacant for extended period in order to meet the Council's annual target of restoring 50 empty homes back into use. 	Ongoing
<ul style="list-style-type: none"> ▪ Create a small sites register (10 units or less) to promote development opportunities for small and medium sized housebuilders. 	Short-term
<ul style="list-style-type: none"> ▪ Support our Housebuilding Company Handford Homes to develop the local construction market to enable local small and medium sized construction firms to bid for the construction of new council housing. 	Short to medium-term
<ul style="list-style-type: none"> ▪ Engage with developers to progress those sites which have consent but have not commenced on site. 	Short to medium-term
<ul style="list-style-type: none"> ▪ Promote early S106 negotiations with the aim of agreeing a package of obligations in principle with the applicant as part of the pre-application discussions. 	Short-term
<ul style="list-style-type: none"> ▪ Prepare and publish a standardised template Section 106 Agreement. 	Short-term

<ul style="list-style-type: none"> Recruit a dedicated officer to support Section 106 Agreement progression and monitoring. 	Short-term
<ul style="list-style-type: none"> Work with SCC regarding S106s to make them quicker and clearer, and that specific contributions are justified. 	Short to medium-term
<ul style="list-style-type: none"> Review our pre-application advice process by introducing a traffic light assessment format and creating a clear route map for applicants. 	Short-term
<ul style="list-style-type: none"> Review the Local Validation List to enable applications to be assessed effectively and expeditiously. 	Short-term
<ul style="list-style-type: none"> Use Enterprise software to increase business efficiency and productivity. 	Short-term
<ul style="list-style-type: none"> Investigate opportunities to work with partners to market the town. 	Short to medium-term
<ul style="list-style-type: none"> Provide an 'opportunities map' of key development sites in priority areas for growth (linked to the Local Plan). 	Short-term

The Council is committed to delivering and monitoring the progress on these actions.

Key to implementation table

Short-term = 12 - 18 months
Medium-term = 19 - 36 months
Long term = 36 months or more

Monitoring

The actions will be implemented and monitored regularly by an officer steering group, comprising staff from the Planning, Property Services, Private Sector Housing, Tenancy Services, Economic Development and Environmental Health teams.

The group will meet quarterly to ensure actions are being taken forward in a timely manner. Implementation will require collaboration across the departments, corporate management team and in association with the private sector developers and affordable housing.

The plan and actions will be reviewed and updated annually.

Covid-19 does not appear to have had a significant impact on housing delivery rates, although this will of course be kept under review. The Council has direct survey engagement with the development sector (see review undertaken in 2020) and this will be repeated in the autumn of 2021.



Useful Links

Ipswich Housing Strategy 2019-2024 -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/finalhousing_strategy_-_2019_-_2024.pdf

Adopted 2017 Ipswich Borough Council Local Plan

Core Strategy and Policies Development Plan Document Review -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/adopted_core_strategy_and_policies_dpd_review_1_march.pdf

Adopted 2017 Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document -

https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/adopted_site_allocations_and_policies_dpd_and_appendix_3a_site_sheets.pdf

Emerging Ipswich Borough Council Local Plan -

<https://www.ipswich.gov.uk/services/emerging-ipswich-local-plan-2018-2036>

Strategic Housing and Employment Land Availability Assessment -

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

