Ipswich Borough Council Local Plan

Examination of Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

Stage 1 Matters and Questions - Response to Matter 2 Objectively Assessed Needs for Housing and Employment Land

February 2016

IPSWICH
BOROUGH COUNCIL

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Matter 2.1 – Is the identified objectively assessed need (OAN) for housing of 13,550 new dwellings (an average of 677 per year), as set out in policy CS7, soundly based and supported by robust and credible evidence? In particular:

(a) Does the OAN take appropriate account of the 2012-based CLG Household Projections?

1. The 2012-based Household Projections (the official projections) were published by CLG on 27th February 2015, after the Council had undertaken its own modelling of population and household projections and published its Proposed Submission Core Strategy and Policies DPD Review[1] under Regulation 19 of the 2012 Regulations[2]. Under the guidance of the national Planning Practice Guidance[3] (PPG), the 'household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need' (Methodology – Assessing Housing Need, paragraph 15). The PPG requires the assessment to be 'thorough but proportionate' (Housing and Economic Development Needs Assessments, paragraph 5). Revising the modelling each time new projections are published by CLG would not be proportionate to the plan-making process, bearing in mind the extent of time and resource required.

2. More fundamentally, there are understood to be concerns over the migration trends used in the 2012-based forecasts in terms of low levels of national migration experienced during the recession.

3. Whilst the OAN could not take appropriate account of the official 2012-based projections, or the sub-national population projections (which were published in May 2014) that drive them, the demographic and economic conditions were known. These demographic and economic conditions are critical to the consideration of the OAN and were detailed in the 2012 Strategic Housing Market Assessment (SHMA)[4].

4. The rationale behind the projections is explained in Ipswich Population and Household Projections – Methodology and Rationale[5] (see Appendix 1). Table 1 below compares the household projections of different approaches.

Table 1: Comparison of Household Projections

	2011	**2016**	**2021**	**2026**	**2031**
CLG (2011 Interim)	57,432	60,112	62,614	-	-
Luton (Trend)	58,717	62,260	65,641	68,967	72,248
CLG (2012)	57,440	60,076	62,865	65,360	67,875

5. The 2012-based CLG projections result in a need for 10,435 dwellings to 2031 (without applying any other assumptions or modelling). Using this figure instead of the 13,550, and applying the same assumptions around delivery as contained in Table 3 to Policy

[1] CLG, 2012, *Town and Country Planning (Local Planning) (England) Regulations 2012*, Core Document Library (CDL) reference NCD04
[2] CLG, 2012, *Town and Country Planning(Local Planning) (England) Regulations 2012,* CDL reference NCD04
[3] CLG, 2014 and ongoing, *Planning Practice Guidance,* CDL reference NCD19
[4] Babergh, Mid-Suffolk and Suffolk Coastal District Councils, 2012, *Ipswich Housing Market Area Strategic Housing Market Assessment,* SCD12
[5] Ipswich Borough Council, February 2016, *Ipswich Population and Household Projections – Methodology and Rationale,* CDL reference PSCD02

CS7[6], a residual of 663 dwellings would remain. Therefore, there would remain a need to work with neighbouring authorities to address housing needs.

6. Emerging evidence in respect of population and household projections, which reflects an improving economic climate and subsequent increases in population within the housing market area over the figures published in the September 2013 projections, will be considered by all the Ipswich Policy Area (IPA) authorities[7] in preparing the future Joint or Aligned Local Plan Review and through any Suffolk Strategic Plan. This will form part of a process to identify needs to 2036 along with ambitions or approaches to future collective growth.

7. Ipswich Borough Council needs to have an adopted Local Plan in place in order that the Ipswich Garden Suburb, a significant source of supply, can come forward in a planned manner and that developers and landowners are provided with certainty in relation to proposed allocations. The sites identified in the Ipswich Local Plan are required whichever method of forecasting household requirements referred to above is used. Revisiting the household modelling at this late stage, and thus delaying the plan, would therefore be counter-productive.

(b) Does the OAN appropriately consider the likelihood of past trends in migration and household formation continuing in the future?

8. The OAN has considered the likelihood of past trends in migration and household formation continuing in the future as explained in Ipswich Population and Household Projections – Methodology and Rationale[8] (see Appendix 1). The approach taken is considered to be robust.

(c) Does the OAN take appropriate account of 'market signals'?

9. As explained within Ipswich Population and Household Projections – Methodology and Rationale[9] (see Appendix 1), market signals were considered through the production of the Strategic Housing Market Assessment but it was concluded that no adjustment was required to the projections to account for this.

(d) Is the OAN appropriately aligned with forecasts for jobs growth?

10. The National Planning Policy Framework (NPPF)[10] calls for land uses within an area to be balanced so that people can be encouraged to minimise journey lengths (paragraph 37) and for an integrated approach to considering the location of housing, economic uses and community facilities and services (paragraphs 70 and 158).

11. The topic papers 'Reviewing the Ipswich Housing Figures'[11] and 'Employment'[12] explain how the objectively assessed need for housing and employment has been calculated, using the POPGROUP model and the forecasts arising from the East of

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[6] Ipswich Borough Council, September 2015, *Core Strategy and Policies DPD Review – Pre-Submission Main Modifications,* CDL reference SUCD02
[7] Ipswich Borough Council, Babergh District Council, Mid-Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council – see Ipswich Borough Council response to Matter 1.4
[8] Ipswich Borough Council, February 2016, *Ipswich Population and Household Projections – Methodology and Rationale,* CDL reference PSCD02
[9] Ipswich Borough Council, February 2016, *Ipswich Population and Household Projections – Methodology and Rationale,* CDL reference PSCD02
[10] National Planning Policy Framework March 2012, NCD18
[11] Reviewing the Ipswich Housing Figures Topic paper, January 2015 updated October 2015, IBC, LPCD38
[12] Employment Topic Paper, January 2015 updated October 2015, IBC, LPCD40

England Forecasting Model (EEFM) respectively. The Housing and Population Projections Methodology and Rationale paper[13] provides more technical information behind the Objectively Assessed Need (OAN) figure for housing.

12. The relationship between homes and jobs is complex.

13. The Ipswich Housing Market Area Population and Household Projections paper[14] compares the outputs of demographic approaches with the economic approach (EEFM) in relation to projecting household requirements. Using more than one approach provides a process to compare the outputs and consider the reliability of each approach. The 2012 EEFM run was considered through the POPGROUP modelling. Comparing with an EEFM scenario also provided a mechanism for ensuring that the approach selected to determine the OAN would not be underproviding housing to meet the economic needs for the Borough reflected by the economic forecast available at the time. The Housing and Employment Integration Statement[15] (see Appendix 2) provides more technical detail about how the OAN and forecasts for jobs growth have been integrated and aligned.

14. The jobs figures for Ipswich 2011-2031 based on the EEFM outputs of 2011 to 2014 runs were in the range 11,400 to 12,700. Therefore, the Core Strategy Review policy CS13 (as modified September 2015) sets out a target of 'approximately 12,500 jobs.' The household forecast generated through the POPGROUP modelling using the EEFM approach was 12,500 households. The household outputs from the EEFM model are not as robust as the Trend Migration method, from which the OAN of 13,550 derives, as the EEFM applies a household ratio to the total population, as explained in the Household and Population Projections Methodology and Rationale paper.

15. The plan strategy proposes that some of the Ipswich objectively assessed housing need will need to be met through working with neighbouring authorities. Therefore it is necessary to consider travel to work patterns to demonstrate that the strategies for housing and employment are consistent with each other.

16. Trends in the growth of jobs, population and housing within the Borough since 2001 show some variance. Since 2001, the number of jobs within the Borough has fluctuated, whereas the population and number of households have grown steadily.

17. Over the same period, the travel to work self-containment of Ipswich Borough decreased from 69.2% to 62%[16]. However, the proportion of jobs within Ipswich filled by Ipswich residents also declined from 57.5% to 55.7%, which suggests that the reduced self-containment is not necessarily related to the balance between jobs and residents in employment within the Borough. There may be many reasons for these changes, including the relative affordability of housing in Ipswich, the 20% increase in the Ipswich population aged 16-64 between 2001 and 2011[17], or the types of jobs available.

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[13] Ipswich Borough Council, February 2016, *Household and Population Projections Methodology and Rationale,* CDL reference PSCD02

[14] Luton Traded Services, September 2013, *Ipswich Housing Market Area Population and Household Projections,* CDL reference ICD08

[15] Ipswich Borough Council, February 2016, *Housing and Employment Integration Statement,* CDL reference PSCD08

[16] Ipswich Borough Council, December 2015, *Background to the Transport Evidence informing the Ipswich Local Plan*, CDL reference ICD48b. Note this figure excludes those Ipswich residents working from home and those with no fixed place of work.

[17] Ipswich Borough Council, December 2015, *Background to the Transport Evidence informing the Ipswich Local Plan*, CDL reference ICD48b

18. The main destination of Ipswich residents remains the central area of the town, followed by other areas within the Borough (including Hadleigh Road Industrial Estate, Ransomes Europark and Ipswich Hospital) and then destinations nearby including Martlesham and Felixstowe. The 2011 Census shows that 88% of journeys to work from Ipswich are either to Ipswich or to neighbouring local authority areas.

19. Housing growth beyond the Borough boundary could provide housing opportunities for Ipswich residents currently commuting out from Ipswich, however as stated above a number of other factors may contribute to this trend. Equally increased jobs provision within Ipswich could help to reverse the trend of residents commuting outside of the Borough for employment.

20. Within the larger Ipswich Travel to Work Area (ITTWA),[18] which covers large parts of those neighbouring districts, the travel to work self-containment (i.e. the number of employed residents living and working within an area)[19] was 85.9% in 2011[20].

21. The relative self-containment within the ITTWA at 2011 and the high proportion of journeys by Ipswich residents to work destinations within or just outside the Borough boundary suggests that the joint, cross-boundary approach to accommodating growth promoted through Core Strategy Review policies CS2, CS6 and CS7 is an effective and appropriate way in which to integrate and align strategies for housing and jobs growth.

(e) Does the OAN take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

22. The 2012 Strategic Housing Market Assessment (SHMA)[21] identifies a need for 584 affordable dwellings per year. A total of 548 affordable dwellings have been completed in the Borough since April 2011 and the Council has a target to deliver 1,000 new council houses over the next ten years (by 2025). This leaves a requirement of 10,132 affordable dwellings to be delivered by 2031 to meet the need identified in the 2012 SHMA. This is almost as great as the number of dwellings which remain to be allocated / delivered through the Local Plan as identified under CS7 (10,207), (although it is acknowledged that further affordable units will be delivered through planning permissions granted or with a resolution to grant but not completed). Viability Testing for the Ipswich Local Plan[22] has led to the policy requirement for affordable housing to be set at 35% for the Ipswich Garden Suburb and 15% in all other parts of the Borough in schemes of 15 dwellings or more or 0.5ha or more. The rationale is explained in the Ipswich Borough Council commentary on the Viability Report[23].

23. There are limited changes that could be made to the Local Plan itself to support further delivery of affordable housing. Paragraph 8.94 expresses specific support for 100% affordable housing schemes delivered by the Council, and this could be amended to

[18] Travel to work areas were re-mapped by the ONS in August 2015 http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html
[19] WSP, February 2016, *Ipswich Census Data Trend Analysis,* 2014/15, CDL reference PSCD09
[20] 2011 Travel to Work Area Summary Statistics Version 4, ONS, TTWA E30000222 http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html
[21] Babergh, Mid-Suffolk and Suffolk Coastal District Councils, 2012, *Ipswich Housing Market Area Strategic Housing Market Assessment,* CDL reference SCD12 – page 119
[22] Peter Brett Associates, 2014, *Viability Testing for the Ipswich Development Plan,* CDL reference LPCD26
[23] Ipswich Borough Council, 2014, *Ipswich Whole Plan Viability Testing – Ipswich Borough Council Commentary,* CDL reference LPCD27

provide support for schemes of up to 100% affordable housing regardless of provider as set out below:

Paragraph 8.94 (last sentence):
'Additionally, where the market is failing to provide an appropriate level of affordable housing to meet the identified need, the Council <u>or other provider</u> may deliver up to 100% of a site for affordable housing within the context of the wider needs of the community.'

24. Given the need for affordable housing to be delivered, and therefore the need to ensure that work on a Joint or Aligned Local Plan Review takes place in the short term, the modifications to CS2, paragraph 8.31, CS7 and paragraph 8.83 put forward in relation to housing delivery under matter 2.3 also apply to this matter.

25. The Government is widening the range of measures which can address the need for affordable housing, as indicated through the consultation on amendments to the National Planning Policy Framework[24]. The consultation document states 'We propose to amend the national planning policy definition of affordable housing so that it encompasses a fuller range of products that can support people to access home ownership. We propose that the definition will continue to include a range of affordable products for rent and for ownership for households whose needs are not met by the market, but without being unnecessarily constrained by the parameters of products that have been used in the past which risk stifling innovation. This would include products that are analogous to low cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing' (paragraph 9). It is therefore reasonable to assume that a proportion of affordable housing need will be met outside of the affordable housing requirements set out under policy CS12.

[24] DCLG, December 2015, *Consultation on proposed changes to national planning policy,* CDL reference PSCD05

Matter 2.2 – Is the plan clear as to the identified need for additional pitches for gypsies and travellers (policy CS11) and is the identified need soundly based and supported by robust and credible evidence?

26. The supporting text to policy CS11 (paragraph 8.114) explains and quantifies the need for permanent gypsy and traveller pitches in Ipswich over the plan period. The need is identified through the Gypsies and Travellers Accommodation Assessment (GTAA)[25]. The GTAA was produced in line with national policy contained in Planning Policy for Travellers (CLG, 2012) which has since been replaced with Planning Policy for Travellers[26].

27. It is considered that the GTAA is consistent with guidance in the 2015 Planning Policy for Travellers in respect of the requirements set out in paragraph 7 'Using Evidence'. In this respect the preparation of the GTAA involved surveys of the gypsy and traveller population as well as their representatives alongside an assessment of current provision.

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[25] Opinion Research Services, 2013, *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment,* CDL reference SCD18

[26] CLG, 2015, *Planning Policy for Travellers,* CDL reference NCD22

Matter 2.3 – The soundness of proposals for the Ipswich Garden Suburb and the land allocations for housing set out in policy SP2 (and the case for 'omission sites') will be considered at Stage 2 of the Examination. However, on the basis of the plan as submitted, is it realistic that they would provide for:

(a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?

28. Based on the need for 13,550 dwellings as set out in policy CS7 of the Proposed Submission Core Strategy and Policies DPD[27] there is an annual requirement for 677 dwellings between 2011 and 2031.

29. Using the housing trajectory as at 1st April 2015, as contained in the 2014/15 Authority Monitoring Report (AMR)[28] a supply of 2,556 dwellings is identified as deliverable for years 1-5. This equates to a supply of 3.05 years, and a shortfall of 1,633 dwellings, based on the housing requirements of the Core Strategy Review. The Housing Supply Position Statement[29] (see Appendix 3) contains the trajectory and details of how these figures have been calculated. Table 2 below summarises the supply position for years 1-5 and years 6-10.

Table 2: Housing Land Supply, years 1-5 and 6-10

Period of plan	**Dwellings per year**	**Identified Supply**	**Years of supply**	**Shortfall**
Years 1-5 (2015/16 – 2020/21)	839	2,556	3.05	1,633
Years 6-10 (2021/22 – 2025/26)	804	3,460	N/A	560

Note: Dwellings per year includes a proportion of the shortfall accumulated since 2011.

30. The plan as submitted does not, therefore, provide for a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption.

(b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?

31. For years 6-10 the requirement is 4,020 dwellings. The NPPF requires a supply of 'developable' sites to be identified for years 6-10. The supply of 'developable' sites is identified as 3,460 dwellings using the trajectory as contained in the 2014/15 AMR, leaving a shortfall of 560 dwellings as detailed in the Housing Supply Position Statement and shown in Table 2 above.

32. However, the commitment to begin work on a Joint or Aligned Local Plan Review with neighbouring planning authorities will result in sites being identified and allocated which would deliver this shortfall. The timetable is for this work to commence during 2016 with anticipated adoption in December 2019 as set out in the Ipswich Local Development Scheme[30] and Suffolk Coastal Local Development Scheme.[31]

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[27] Ipswich Borough Council, November 2014, *Proposed Submission Core Strategy and Policies Development Plan Document,* CDL reference SUCD01

[28] Ipswich Borough Council, December 2015, *Authority Monitoring Report 2014/15,* CDL reference ICD03a

[29] Ipswich Borough Council, February 2016, *Housing Supply Position and Scenario Statement*, CDL reference PSCD01

[30] Ipswich Borough Council, October 2015, *Local Development Scheme 9th Edition,* CDL reference ICD02a

[31] Suffolk Coastal District Council, October 2015, *Local Development Scheme,* CDL reference SCD41

If you contend that the plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?

33. It is simply not possible to alter the plan to provide a deliverable 5 year supply due to the constrained nature of the Borough boundary. Through the process of producing the plan the Council has considered ways in which supply could be increased within the Borough, as set out below:

- An alternative of higher densities was put forward through the Sustainability Appraisal process[32] but is considered to be undeliverable in the current economic climate. The NPPF states that local planning authorities should 'set out their own approach to housing density to reflect local circumstances' (paragraph 47).

- The Ipswich Strategic Housing Land Availability Assessment[33] considered the potential for greenfield sites on the periphery of the Borough to be allocated for housing. Sites IP179 'Land surrounding Thurleston Lane' and IP184 'Land adjacent to Humber Doucy Lane' could deliver 562 and 226 dwellings respectively. However both sites were discounted due to infrastructure constraints which would need to be addressed through larger scale development in association with adjoining authorities. For the purposes of this Local Plan the sites have therefore been identified as countryside, to ensure that the sites' suitability to deliver development can be properly considered through future work on a Joint or Aligned Local Plan Review. In relation to IP184, consultation on Suffolk Coastal District's Issues and Options for its Site Allocations and Area Specific Policies Development Plan Document[34] shows that sites beyond IP184 but in Suffolk Coastal district have been put forward for development by promoters. The sites were discounted for a number of reasons as explained in the Issues and Options document, and any development within this area will need to be considered as part of the proposed Joint or Aligned Local Plan Review.

- As part of the production of the Site Allocations plan additional sites were considered but were discounted for various reasons as detailed in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Interim Sustainability Appraisal Report[35] and the Proposed Submission Site Allocations and Policies Development Plan Document Pre-submission Consultation Statement[36].

34. There are also a number of smaller areas of countryside identified around the periphery of the Borough. This includes five parcels of land on the western edge of the Borough adjacent to the A14. These sites have not been considered through the SHLAA or through the Local Plan process as, between them, they are heavily constrained or have other significant problems including noise from the A14, lack of access from within the Borough and represent arbitrarily drawn parcels of land relating purely to the boundary of the Borough. Development of land to the north of IP179 would present the same issues as identified with IP179 itself.

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[32] Hyder, December 2014, Proposed Submission Core Strategy and Policies Review DPD Sustainability Appraisal Report, CDL reference LPCD47 – chapter 4

[33] Ipswich Borough Council, 2010, *Strategic Housing Land Availability Assessment Final Report,* CDL reference ICD09

[34] Suffolk Coastal District Council, December 2014, *Map Booklet to accompany Issues and Options consultation on Site Allocations and Area Specific Policies Local Plan Document***,** CDL reference PSCD04

[35] Hyder, December 2013, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) Interim Sustainability Appraisal Report*, CDL reference LPCD22

[36] Ipswich Borough Council, November 2014, *Proposed Submission Site Allocations and Policies Development Plan Document Pre-submission Consultation Statement,* CDL reference SUCD18

35. The Council is positively and proactively engaging with landowners and developers to understand the prospects and barriers to delivery of housing sites. Due to the nature of the Borough most sites are brownfield and many have complex issues surrounding their redevelopment, such as multiple land ownership, remediation of contaminated land or protection of heritage assets. In addition, such sites will only deliver a notable number of dwellings through mainly flatted development, the delivery of which was affected by the recession. It should also be noted that correspondence with landowners suggests that, in a number of cases, the process of allocating sites will assist in bringing the sites forward by creating an element of certainty in securing planning permission. Having an allocation in an adopted Local Plan can influence decisions over future lease agreements. Delivery of houses on any notable scale will be through Ipswich Garden Suburb, and the adoption of the Core Strategy review is essential in bringing this forward in a properly planned manner. As an example of how the Council is trying to bring sites forward, the Council is producing development briefs for a number of sites. The Council is working closely with the proposed developers of the Garden Suburb and is currently co-ordinating the production of an Infrastructure Delivery Plan. Through its Housing function the Council is also conducting a programme of Council house building with a target of delivering 1,000 dwellings over ten years (by around 2025).

36. The following amendments to the Proposed Submission Core Strategy and Policies DPD Review[37] and the Pre-Submission Main Modifications[38], would emphasise that work with neighbouring authorities is intended to start in the short term, in accordance with the Local Development Scheme, and not later in the plan period:

Policy CS2 THE LOCATION AND NATURE OF DEVELOPMENT:
'**b. ~~Later in the plan period, w~~Working with neighbouring authorities to address housing need with the Ipswich housing market area**'

Paragraph 8.31:
'~~Later in the plan period after 2024, the Council's housing land supply opportunities within the Borough boundary become more limited, and, therefore there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities.~~ The housing requirement for Ipswich cannot be met within the Borough boundary and therefore the Council will work with neighbouring authorities to identify further development opportunities. Policy CS7 sets out the Borough's objectively assessed housing need.'

Policy CS7 THE AMOUNT OF NEW HOUSING REQUIRED:
'**To meet the remaining requirement of 5,578 dwellings to 2031, the Council will rely on windfall sites and will work with neighbouring local authorities to address housing need ~~later in the plan period~~.**'

Paragraph 8.83:
'In working with neighbouring authorities to address housing need ~~later in the plan period~~, consideration will need to be given to avoiding or minimising effects in these areas including environmental designations, landscape, townscape and historic assets.'

[37] Ipswich Borough Council, December 2014, *Proposed Submission Core Strategy and Policies DPD Review,* CDL reference SUCD01
[38] Ipswich Borough Council, September 2015, *Core Strategy and Policies DPSD Review – Pre-Submission Main Modifications,* CDL reference SUCD02

37. To conclude, not having an adopted Local Plan in place may impact negatively upon the delivery of sites by not creating the certainty required by landowners in considering the future of their sites. Whilst a 5 year supply cannot presently be identified, not having a Local Plan in place would simply hinder the movement towards that key objective. Not having a plan in place would also mean that the proposed approach towards working with neighbouring authorities would not form part of the adopted planning approach for the Borough.

Matter 2.4 – The soundness of individual employment sites set out in policies CS13 and SP5 will be considered at Stage 2 of the Examination. However, on the basis of the plan as submitted, is policy CS13's aim of encouraging the provision of approximately 12,500 jobs soundly based and supported by robust and credible evidence?

38. The Employment Topic Paper[39] explains that the jobs target set out in policy CS13 of the Core Strategy Review derives from the East of England Forecasting Model (EEFM)[40]. Paragraphs 53 - 60 of the Employment Topic Paper specifically explain the methodology behind the EEFM. The EEFM is used by planning authorities across the East of England and forecasts for Ipswich are therefore aligned with forecasts for surrounding authorities.

39. The Employment Topic Paper states (paragraph 54) that the EEFM uses Business Register and Employment Survey data about the number of jobs in an area and applies assumptions about macro- and local economic trends to forecast changes in the number of jobs in the eastern region and constituent local authority areas into the future. The Technical report to the EEFM[41] provides more information on the model's methodology and data sources. The EEFM factors in a range of variables in generating its job forecasts, including:
    - Employees in employment and self-employment;
    - Unemployment;
    - Residents in employment;
    - Total workplace employment; and
    - Net commuting flows.

40. An Employment Land Needs Assessment (ELNA) has recently been produced for the Ipswich Functional Economic Area[42] and the findings identify floorspace and land requirements as set out in the table below. These are based upon apportioning the EEFM jobs forecasts, by sector, to the different B use classes, with reference to local circumstances. The land required is based upon applying a ratio of 0.4 to B1c, B2 and B8 floorspace requirements. For B1 uses, due to the higher densities achieved in town centre locations a ratio of 2.0 has been applied to 50% of the B1 requirement with 0.4 applied to the remaining 50%. The floorspace and land requirements are shown in Table 3 below.

[39] Ipswich Borough Council, October 2015, *Employment Topic Paper*, CDL reference LPCD40
[40] Oxford Economics, 2015, 2013 and 2012, *East of England Forecasting Model and Technical Reports* CDL reference ICD12, ICD13 and ICD13a
[41] Oxford Economics, January 2015, *East of England Forecasting Model: Technical Report,* CDL reference ICD13a
[42] NLP, February 2016, *Employment Land Needs Assessment for Ipswich and Waveney Economic Areas,* CDL reference PSCD10

Table 3: Floorspace and land requirements (source: Employment Land Needs Assessment)

Employment use class	**Floorspace change 2011-2031**	**Land required**
Office B1a	+39,565sqm	14.5ha
Office B1b	+57,390sqm	
Industrial B1c/B2	-4,085sqm	9.0ha
Warehousing B8	+40,240sqm	
Total	133,100sqm	23.5ha

41. It should be noted that a proportion of the 12,500 jobs are forecast to be created in sectors which are not within B class uses, such as health and education.

42. In producing the Employment Topic Paper this calculation was undertaken in reverse (hectares converted to jobs) and shows that, using established employment densities[43], the proposed allocations would support the creation of 14,612 jobs.

43. As per the NPPF (paragraph 161), it is necessary to undertake a qualitative and well as quantitative assessment of floorspace needs. The findings of the ELNA for the Ipswich Functional Economic Area suggest that existing businesses have insufficient space to meet their needs and that businesses are requiring modern, quality, purpose built premises. Many of the employment allocations proposed in the Site Allocations plan would support two or more B class uses and this provides an element of flexibility for businesses in taking up these sites. Policy SP5 of the Site Allocations plan[44] proposes to allocate a total of 49.13ha of employment land with a further 10ha allocated at Futura Park, demonstrating that the plan is providing businesses with a sufficient choice of locations and also providing existing businesses with opportunities to relocate to more suitable premises. The ELNA states that the floorspace and land requirements should be viewed as a baseline quantum.

44. The jobs forecasts generated by the EEFM have been considered and compared with what is known locally about the Ipswich economy and growth sectors targeted by the New Anglia Local Enterprise Partnership (NALEP) and Suffolk Growth Strategy (see paragraphs 69 to 88 of the Employment Topic Paper). The figures show no unexpected changes, with health, education, retail and finance remaining the largest employment sectors in the Borough over the period 2011 to 2031. Finance is one of the key 'underpinning' sectors identified by the NALEP. The Employment Topic Paper shows that numbers of jobs do fluctuate over short periods of time.

45. To enable jobs to come forward in line with the forecasts, numerous ongoing activities are in place to facilitate jobs growth. The Local Plan is one way in which the forecasted jobs growth will be supported and the plan sets out a delivery strategy to support the jobs figure (see Employment Topic Paper) including employment land allocations.

46. The Employment Topic Paper provides details on the following ways in which jobs growth is being facilitated including:
- Implementation of the Ipswich Economic Development Strategy[45];
- Implementation of the Suffolk Growth Strategy[46];

[43] Employment Densities Guide (Homes and Communities Agency, 2nd Edition, 2010)
[44] As per the modifications proposed in Ipswich Borough Council, September 2015, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Pre-Submission Main Modifications*, CDL reference SUCD04
[45] Ipswich Borough Council, 2013, *Ipswich Economic Development Strategy* CDL reference ICD76
[46] Suffolk Local Authorities, 2014, *Suffolk Growth Strategy,* CDL reference SCD01

- Development of an Inward Investment Strategy for Ipswich;
- Targeting markets currently outside Suffolk; and
- The Greater Ipswich City Deal.

47. Since the Employment Topic Paper was written, the Council has also succeeded in winning Enterprise Zone status for four key employment sites: Futura Park (the strategic employment site allocated through policy CS13); Princes Street Corridor (sites allocated and safeguarded through policies SP5 and DM25); part of the Island Site IP037 (allocated through policies SP2 and SP5) and a site immediately adjacent to the Borough boundary but within Babergh District at the former sugar beet factory on Sproughton Road (see press release at: https://www.ipswich.gov.uk/content/economic-boost-ipswich).

48. The ELNA states that Ipswich is the over-riding economic driver within the Ipswich Functional Economic Area and that the A14 is a key commercial property market driver. 79% of Ipswich businesses who responded to a survey conducted as part of the ELNA stated that they expected to expand in the next 5-10 years which indicates that there is demand to grow from businesses themselves.

49. In conclusion, policy CS13's aim for the creation of approximately 12,500 jobs by 2031 is based upon robust forecasting and supported by actions to facilitate and promote jobs growth.

Appendix 1 – Population and Household Forecasting – Methodology and Rationale

Ipswich Borough Council Local Plan

Population and Household Forecasting – Methodology and Rationale

February 2016

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BOROUGH COUNCIL

Planning and Development
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1. Purpose

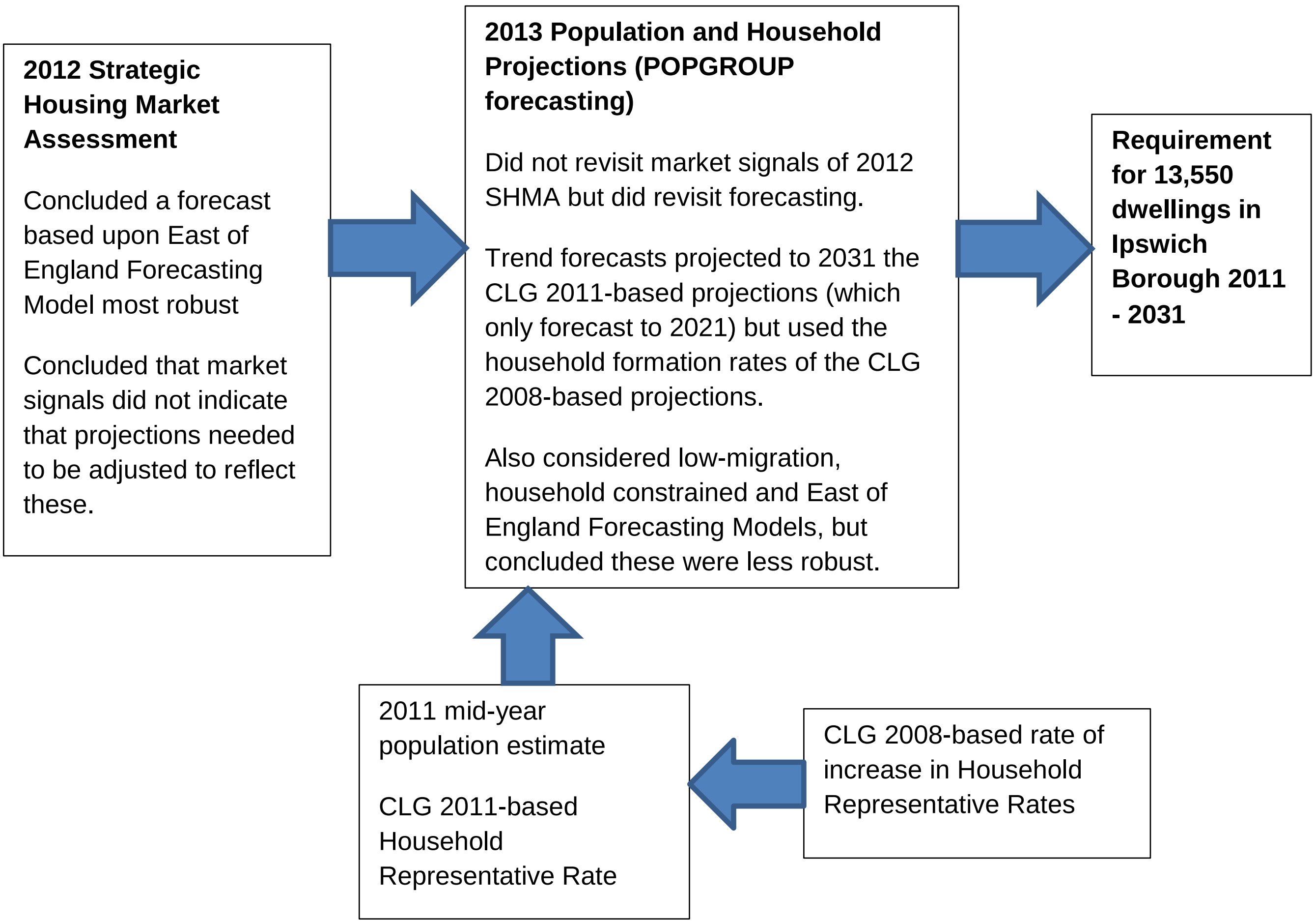
This paper explains the methodology and rationale used in identifying the housing requirement for Ipswich Borough for 2011 – 2031. A Strategic Housing Market Assessment (SHMA) was produced for the Ipswich Housing Market Area in 2012[47] and in 2013 Ipswich Borough Council commissioned Luton Traded Services to model population and household projections for the Ipswich Housing Market Area and the four council areas within it.

2. National policy and guidance

The Planning Practice Guidance (PPG) sets out a methodology for assessing housing needs. This guidance was first published in March 2014, after the production of the SHMA and the 2013 modelling work. Nevertheless, this paper explains how the projections for Ipswich Borough are consistent with the methodology in the PPG.

3. Summary Diagram

The diagram below summarises the detailed explanations contained in the sections below in terms of the inputs to the housing requirement for Ipswich Borough.



[47] Babergh, Mid-Suffolk and Suffolk Coastal District Councils, 2012, *Ipswich Housing Market Area Strategic Housing Market Assessment*, Core Document Library (CDL) reference SCD12

3. Household and population projections

The PPG (Methodology – Assessing Housing Need, paragraph 15) states that 'Household projections published by the Department for Communities and Local Government (CLG) should provide the starting point estimate of overall housing need.' The PPG refers to the latest CLG projections as being those released on 27th February 2015 (the 2012-based projections).

The 2008-based official projections were acknowledged in the 2012 SHMA, as was Government policy for local authorities to use these as part of the evidence base (Section 8.4.1 of the SHMA). An important feature was that the then official projections had over-estimated the number of households in 2011 even though the equivalent population projections had underestimated the population in Ipswich (paragraph 8.4.5 of the SHMA). The SHMA tested a number of different approaches and concluded (page 1.5) that the East of England Economic Forecasting (EEFM) model approach was the most robust for Ipswich when compared to the 2011 Census.

In 2013, the concern of Ipswich Borough Council and other authorities was that the 2011-base Official household projections might not be reliable, which is why Luton Borough Council were commissioned to undertake further projections using the POPGROUP modelling approach. The POPGROUP approach was able to produce forecasts which could better relate to demographic change. The forecasting followed the same methodology as the CLG projections but applied headship rates based upon the 2008-based CLG projections due to uncertainty over the robustness of the headship rates used in the 2011-based CLG projections particularly in terms of suppressed household formation amongst young people.

The POPGROUP forecasting considered a number of different scenarios including Trend, Low Migration, Household Constrained and East of England Forecasting Model. As explained in the Housing Topic Paper[48], the Trend approach was considered to be most robust.

Whilst the EEFM is used to generate forecasts of job numbers, it was considered less robust for forecasting household numbers through the POPGROUP modelling as the EEFM applies a household ratio to the total population rather than separating out the probability of different age/sex cohorts forming a household.

The fact that the 2011-based projections only go to 2021 did mean, however, that data in later years would need to the inputted. Therefore, given that in 2013 a wholly revised set of household projections was not available and given that devising a whole new approach would not be feasible given time and resource constraints, a combined approach was chosen. The approach taken used the 2011-based projections for the year 2011 as the baseline. The annual changes to the household formation rates, known as Household Representative Rates (HRR), from the 2008-based projections were then applied to each year and household type.

The resultant five-year trend population projections used in the POPGROUP forecasts use similar approaches on the CLG projections i.e. average migration levels over five years (2006-2011). The table below compares the different projections of the future population for Ipswich. The trend-based approach results in higher population than those used in the 2011 Interim and 2012-based official household projections owing to a combination of the application of birth and death ratios to the population and the application of a total average of migration for trend instead of the ratio-based approach used by ONS.

[48] Ipswich Borough Council, October 2015, *Topic Paper - Reviewing the Ipswich Housing Figure,* CDL reference LPCD38

Table 1: Ipswich Population Projections Compared

	2011	2016	2021	2026	2031
ONS (2011 Interim)	133,730	138,300	142,900	-	-
Luton (Trend)	133,750	139,634	145,254	150,201	154,713
ONS (2012 Base)	133,730	138,600	143,700	148,100	152,000

As stated above, to forecast households the 2008-base HRRs were used as it was considered that the 2011-based rates were affected by suppressed household formation particularly amongst younger people. Using Ipswich as an example, the HRRs (i.e. the ratio at which new households form) for a family (23-44) with two children in Ipswich from the 2011-base is 0.135. From the 2008 base, the difference in the rate for 2012 and 2011 is -0.001, which was applied to the 2011-based figure (to give a rate of 0.134).

Table 2: Household Projections Compared

	2011	2016	2021	2026	2031
CLG (2011 Interim)	57,432	60,112	62,614	-	-
Luton (Trend)	58,717	62,260	65,641	68,967	72,248
CLG (2012)	57,440	60,076	62,865	65,360	67,875

Table 2 above shows the differences to the number of households projected by the different approaches. It also illustrates the main challenge being that the 2011 Interim results could not provide a long-term view past 2021. It shows the combined effects of increased population projections as well as the re-based HRRs. The 2011 Census recorded 57,298 households within Ipswich. The difference in households in 2031 using the CLG 2012-base projections could be accounted for by the household representative rate applied reflecting recent suppressed household formation.

In summary, whilst the OAN figures could not take account of the 2012-base CLG projections, similar trends and data for population were inputted into the figures. Account was paid to previous concerns over the limitations of the previous official projections in applying the HRRs.

4. Migration

The PPG (Methodology – Assessing Housing Need, paragraph 17) states that 'plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates.' and identifies migration as one area where adjustments may be appropriate.

When the forecasts were commissioned in 2013, consideration was given to the appropriateness of past trends. The relatively low level of national migration was known (SHMA, paragraph 5.3.4) and that this is linked to the economic conditions and the overall decline in the volume of transactions (SHMA, paragraph 7.2.1). National migration has a major impact on migration within the wider Ipswich Housing Market Area and international migration has an impact on Ipswich's population.

An average of the migration data from ONS's components of population change 2006-2011 was used in the POPGROUP forecasting for two reasons. An average of five year trends would accord – in so far as possible – with the methodology used by ONS and, therefore, would make for more ready comparison with official projections. The second reason is that a ten year approach would not make sufficient allowance for the most recent trends in international migration. The average level of UK immigration between 2002 and 2012 was

563,900 per annum, and emigration was 360,700.[49] The equivalent for five years up to 2012 is 568,100 and 357,800. Whilst not substantially different, these indicated that the five year trend was appropriate.

The low migration scenario also considered in the POPGROUP forecasting in 2013 was considered to rely too heavily on Government immigration policy.

Whilst net UK and international migration levels are currently below the trend levels for Ipswich, the pattern over the wider Ipswich Housing Market Area is more closely aligned with the forecasts. Table 3 below demonstrates that the trend-based approach does not underestimate current trends in demographic change in Ipswich or the wider Housing Market Area.

Table 3: Average annual demographic change Household Projections Compared

		Births	Deaths	Natural Change	Net UK migrants	Net Overseas migrants	Migration and other changes
Ipswich	**Trend**	1,746	1,101	645	121	283	1,049
	2014 Population Estimates	1,882	1,088	794	-460	-100	265
Ipswich Housing Market Area	**Trend**	5,148	4,605	544	2,053	290	2,887
	2014 Population Estimates	4,630	4,223	407	2,067	-240	2,293

Note to Table 3: the Components of change from the 2014 Population Estimates include 31 additional people in Ipswich and 59 additional people in the HMA under 'other', which include changes to the size of armed forces stationed in the UK, other special population adjustments and rounding.

5. Household Formation

As stated above, the PPG allows plan makers to consider sensitivity testing specific to their local circumstances in relation to household formation.

One of the issues arising when the household projections were commissioned in 2013 was how the economic conditions since 2007 were affecting household formation as well as the affordability of homes, which is also influenced by a lack in the supply of homes. Of particular note is the difference in the younger HRR between the 2008 and 2011 official projections. These were reflecting previous evidence that younger people were less likely to form households in the economic conditions after 2007.

The methodological report for the interim CLG 2011-base projections[50] went into a greater level of detail but, put simply, the process of aligning the results to the 2011 Census and projecting the resultant trend heightened the decline of younger households. This reinforces the trend observed by the Labour Force Survey (LFS) for declining household formation by younger (20-39) people.[51] The 2011-based projections continued 'to use the changes in the household representative rates by age band from the LFS to estimate the changes that have occurred between the 2001 and 2011 Census'.[52]

[49] ONS (2013) Long-Term International Migration – Average of Rolling Annual Average December 2002 to September 2012
[50] DCLG (2013) Updating Department for Communities and Local Government's household projections to a 2011 base: Methodology Report, pages 10-12.
[51] 2008-based and 2011-based household projections methodologies, each page 10.
[52] DCLG (2010) Updating the Department for Communities and Local Government's household projections to a 2008 base: Methodology, page 10

Table 4 below shows how this change affects the output from the process of using a population base and applying different HRR. The HRRs for the 2008 and 2011-based were applied to the 2011-based household population projections used by CLG. If the 2008-based rates are used, just over 1,400 more young-person households would be projected for Ipswich in 2021 than using the 2011-based results. This is just an example but, nonetheless, it is a clear demonstration on the degree to which CLG's 2011-based projections scaled-back the projected number of young households.

Table 4: Worked example using HRR from 2008-base with Interim 2011-base population projections for Ipswich and compared to published projections – projected results for 2021

Age	**Households (2021) (2011-base)**	**Change in households (by applying 2008-base HRR)**	**% change**
20-39	21,822	+1,412	7%
40-59	21,461	+84	0%
60-79	15,881	+196	1%
80+	4,852	- 30	-1%

The total difference in Table 4 is 1,662 dwellings and is therefore significant. Critically, the 2008-base used a declining representative rate between 2002 and 2009 before reverting to the long-term growth trend from 2009.[53] With the 2011 Census confirming this trend, the reversion to the long-term trend was no longer applied.[54] It should be noted, however, that there are other effects contributing to this delay in household formation such as greater participation higher education and declining rates and later ages of marriage and family formation.

It is nevertheless concluded that the suppressed household formation rates following 2007 was a short term trend linked to the economic cycle and should therefore not form a part of future forecasting. For this reason the HRR from the 2008-based CLG projections were applied.

6. Market signals

The PPG (Methodology – Assessing Housing Need, paragraph 19) states that the 'housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.' Whilst the PPG was published after Ipswich produced its draft revised Core Strategy, market signals had already been taken into account through the 2012 SHMA.

The overall volume of sales was considered, particularly the decline in sales of newly-built homes (SHMA, Table 7.2.2). A comparison was made between the change in median house prices for Ipswich and other areas and that Ipswich had a more substantial decline in prices between 2007 and 2011 than most other areas (SHMA, Tables 7.2.4 and 7.2.5). Of particular note was the decline in the price of flats and apartments and that the potential 'over-supply' was reported by agents (SHMA, paragraph 7.3.4). The price of entry-level accommodation in Ipswich was lower than the national average, or the average for Norfolk and Suffolk (SHMA,

[53] DCLG (2010) Updating the Department for Communities and Local Government's household projections to a 2008 base: Methodology, page 10.
[54] DCLG (2013) Updating Department for Communities and Local Government's household projections to a 2011 base: Methodology Report, page 11.

Table 7.4.1). Of particular relevance is that the percentage change in lower quartile prices between 2001-2011 was lower in Ipswich than the national average (SHMA, Figure 7.4.5).

More recent sales data shows that, between 2013 and 2014, average annual residential sales has increased from 1,700 to 2,200 for Ipswich and 6,600 to 8,000 for the wider Ipswich Housing Market Area[55], as shown in Table 5 below.

Table 5: Rolling Annual Average of Sales of residential properties within Ipswich, the wider Housing Market Area and England 2008-2014 (Q2-based) and the annual averages before and after the recession. (ONS/Land Registry)

	2008	2009	2010	2011	2012	2013	2014	Ave. 1995-2008	Ave. 2008-2015
Ipswich	2,646	1,443	1,853	1,558	1,694	1,701	2,229	2,755	1,882
Ipswich HMA	8,365	4,992	6,761	5,944	6,369	6,203	7,992	9,593	6,733
England	964,272	477,766	652,872	611,377	647,588	644,590	847,956	1,088,168	697,924

The housing market has yet to return to pre-recession levels but that the results for 2014 show signs of growth. The sales figures show that sales have not returned to pre-recession volumes and new supply is dependent upon the market increasing to previous levels of transactions.

The market signals therefore do not suggest that house prices or sales are being affected by supply and therefore an adjustment to the projections is not necessary to reflect any market signals.

7. Conclusions

The above analysis demonstrates that the housing requirement for Ipswich has been founded upon robust methodology which takes account of the specific circumstances of Ipswich Borough and the Ipswich Housing Market Area.

[55] ONS, 2015, House Price Statistics for Small Areas – rolling quarterly average (second quarter)

Appendix 2 – Housing and Employment Integration Statement

Ipswich Borough Council Local Plan

Housing and Employment Integration Statement

February 2016

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Housing and Employment Integration

The topic papers 'Reviewing the Ipswich Housing Figures'[56] and 'Employment'[57] explain how the need for housing and employment has been objectively assessed. A number of approaches to modelling the number of households were compared[58] as a basis for the Core Strategy Review. These included the trend-based demographic approach and an approach using the forecasts arising from the East of England Forecasting Model (EEFM). The Housing and Population Projections Methodology and Rationale paper[59] provides more technical information behind the Objectively Assessed Need (OAN) figure for housing.

Work on the EEFM was started in 2007 in response to a recognised need to co-ordinate economic and population projections across the region. The model is designed to use predictions of future macro-economic conditions and link these to demographic and housing trends in order to estimate changes to employment and population to a local level. The EEFM was not designed to be a detailed mechanism to predict the number of households in each district. Whilst it does provide outputs for households, based on resident population, there is not a direct relationship with the age profiles of local populations.

The approach used to inform the Core Strategy Review was to compare the outputs from a demographic approach with an approach which modelled the population output from the EEFM. Using more than one approach provides a process to compare the outputs and consider the reliability of each approach. The 2012 EEFM run was considered through the POPGROUP modelling. Comparing with an EEFM scenario also provided a mechanism for ensuring that the approach selected to determine the OAN would not be underproviding housing to meet the economic needs for the Borough reflected by the economic forecast available at the time.

The Core Strategy Review was produced using the 2012 and 2013 runs of the EEFM[60]. Not all the results from the 2011 Census results were incorporated into both runs. The 2012 run did not incorporate the population and was based on the 2010 mid-year population estimates. The 2013 run did not include estimates of self-employment, workplace based employment or the origin-destination of the workforce.

The difference arising between the EEFM runs is illustrated in Table 1 below by the forecast resident employment. This is the total number of employed people living in the area and includes residents who commute elsewhere.

[56] Ipswich Borough Council, October 2015, *Reviewing the Ipswich Housing Figures Topic paper*, Core Document Library (CDL) reference LPCD38
[57] Ipswich Borough Council, October 2015, *Employment Topic Paper*, CDL reference LPCD40
[58] Luton Traded Services, September 2013, *Ipswich Housing Market Area Population and Household Projections,* CDL reference ICD08
[59] Ipswich Borough Council, February 2016, *Household and Population Projections Methodology and Rationale,* CDL reference PSCD02
[60] EEFM runs, 2012 - CDL reference ICD12, 2013 - CDL reference ICD13, 2014 - CDL reference ICD13a

Table 1: Resident Employment 2011 and 2031, EEFM

Run	Resident Employment in 2011	Resident Employment rate in 2011 %	Resident Employment in 2031	Resident Employment Rate in 2031 %	Change in Resident Employment
2012	57,920	61.2	66,040	61.1	8,120
2013	63,190	65.0	71,740	63.2	8,550

Ipswich had the fourth largest difference within the East of England between the 'estimated' population in 2011 and the revised 2002-10 mid-year population estimates, which changed to reflect the 2011 Census results. Resident employment was also updated in the 2013 run to reflect the fact that that the Annual Population Survey[61] had consistently underestimated resident employment levels. Despite these changes, the forecast change in resident employment did not change significantly (by 5.3%) as the total change in resident employment shows. The trend for the decline in the rate of resident employment reflects the general ageing of the population.

Commuting patterns are a fundamental element in how the EEFM calculates the resident employment but both runs used the commuting matrix taken from the 2001 Census as the results from the 2011 Census were not then available. In the absence of updated commuting patterns, and to acknowledge that resident employment levels were previously underestimated, the decision was taken to apply an element of flexibility to the jobs figure by stating 'in the region of 12,500' in policy CS13 of the Draft Core Strategy Review, and to retain the trend-based population forecasts rather than updating the forecasts to the results from the 2013 run.

The outputs of the EEFM 2012 baseline run which informed the POPGROUP modelling, along with the outputs of the Trend Migration Scenario, are shown in Tables 2 and 4 below. The EEFM 2013 baseline run results are also provided in Table 3.

Table 2: East of England Forecasting Model Baseline Run 2012

	2011	2021	2031	Change 2011-2031	Change %
Population	129,700	141,700	155,100	25,400	19.58
Households	56,800	63,500	71,100	14,300	25.18
Jobs	74,500	82,000	87,200	12,700	17.05

Table 3: East of England Forecasting Model Baseline Run 2013

	2011	2021	2031	Change 2011-2031	Change %
Population	133,700	149,400	163,400	29,700	22.21
Households	57,200	63,800	71,100	13,900	24.30
Jobs	72,900	79,000	84,300	11,400	15.64

[61] Published by ONS

Table 4: Housing Topic Paper Trend Migration Scenario (from POPGROUP Modelling 2013)

	2011	**2021**	**2031**	**Change 2011-2031**	**Change %**
Population	133,750	145,250	154,700	20,950	15.66
Households	58,700	65,650	72,250	13,550	23.08

The difference in population forecasts generated by the two models (i.e. the EEFM and the POPGROUP trend migration scenario) are explained through the fact that the population forecasts generated by the EEFM show the amount of population increase required to support the jobs increase, regardless of where this population lives. This assumes a continuation of existing (i.e. 2001) commuting patterns.

The household forecast generated through the POPGROUP modelling using the EEFM approach was 12,500 households[62]. The household outputs from the EEFM model are not as robust as the trend migration method, from which the OAN of 13,550 derives, as the EEFM applies a household ratio to the total population, as explained in the Household and Population Projections Methodology and Rationale paper.

The Council considers that the jobs and housing figures have been arrived at using a sound methodology. The EEFM and the POPGROUP forecasting would not be expected to arrive at the same figures for housing and population as they have been established for different purposes.

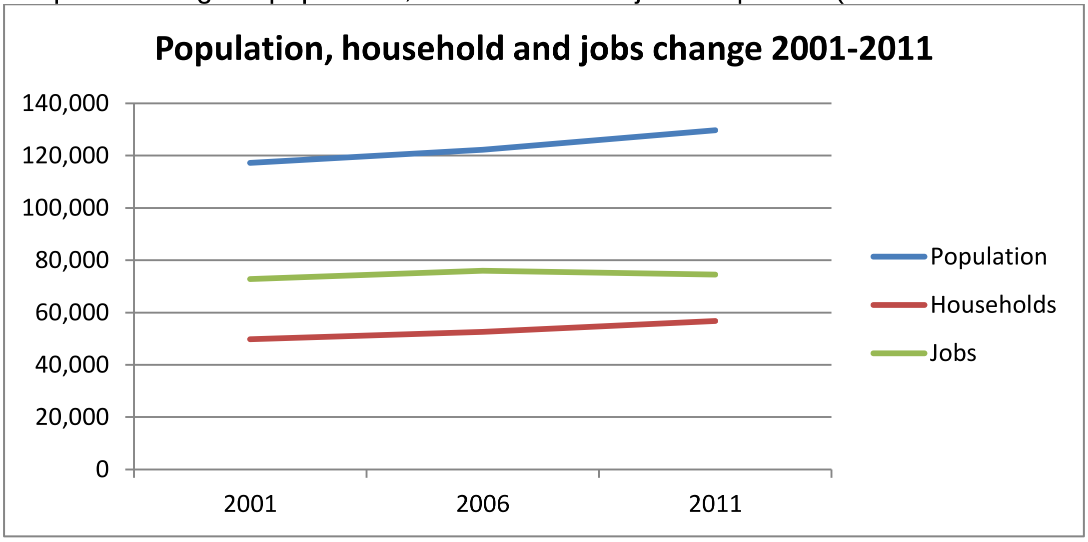
The EEFM is updated periodically and, with each update, the population, households and jobs figures for Ipswich change to reflect, amongst other factors, the updated trend information upon which they are based. However, as outlined in the Employment Topic paper paragraph 55, the jobs figures for Ipswich 2011-2031 reflects the EEFM outputs of the 2012 to 2014 runs which were in the range 11,400 to 12,700. Therefore, the Core Strategy Review policy CS13 (as modified September 2015) sets out a target of 'approximately 12,500 jobs.'

The plan strategy proposes that some of the Ipswich objectively assessed housing need will need to be met through working with neighbouring authorities. Therefore it is necessary to consider travel to work patterns to demonstrate that the strategies for housing and employment are consistent with each other.

Trends in the growth of jobs, population and housing within the Borough since 2001 show some variance. The EEFM 2012 run indicates that, since 2001, the number of jobs within the Borough has fluctuated, whereas the population and number of households have grown steadily. See graph 1 overleaf.

[62] Luton Traded Services, September 2013, *Ipswich Housing Market Area Population and Household Projections,* CDL reference ICD08

Graph 1: Change in population, households and jobs in Ipswich (Source: EEFM 2012 Run)



Over the same period, the travel to work self-containment of Ipswich Borough decreased from 69.2% to 62%. However, the proportion of jobs within Ipswich filled by Ipswich residents also declined from 57.5% to 55.7%, which suggests that the reduced self-containment is not necessarily related to the balance between jobs and residents in employment within the Borough. There may be many reasons for these changes, including the relative affordability of housing in Ipswich, the 20% increase in the Ipswich population aged 16-64 between 2001 and 2011[63], or the types of jobs available.

The findings of the Employment Land Needs Assessment (ELNA) for the Ipswich and Waveney Economic Areas would suggest that Ipswich is well placed to secure jobs growth as the UK economic performance improves following the recession of 2008/9.

The main destination of Ipswich residents remains the central area of the town, followed by other areas within the Borough including Hadleigh Road Industrial Estate, Ransomes Europark and Ipswich Hospital. Key destinations also include Whitehouse, Ipswich southern fringe, Adastral Park in Martlesham, the Port of Felixstowe and Needham Market[64]. The Census data suggests that the proportion of Ipswich employed residents travelling out of the Borough for work increased between 2001 and 2011. The 2011 Census also shows that 88% of journeys to work from Ipswich are either to Ipswich or to neighbouring local authority areas[65]. The destinations identified are nearby, with the most distant being Felixstowe at approximately 12 miles, and have opportunities to access them by public transport.

The Local Plan strategy promotes the delivery of approximately 12,500 jobs within the Borough to 2031 in a range of sectors, including 'B' Class employment uses, retail, leisure and education. It is part of a comprehensive approach which includes allocating a range of sites for development in locations which reflect the two key market drivers of the town centre and the A14, and addressing skills and delivery through initiatives such as City Deal and Enterprise Zone status.

Housing growth beyond the Borough boundary could provide housing opportunities for Ipswich residents currently commuting out from Ipswich, however as stated above a number of other factors may contribute to this trend. Equally increased jobs provision within Ipswich

[63] Ipswich Borough Council, December 2015, *Background to the Transport Evidence informing the Ipswich Local Plan,* CDL reference ICD48b
[64] Ipswich Borough Council, December 2015, *Background to the Transport Evidence informing the Ipswich Local Plan,* CDL reference ICD48b
[65] WSP, 2016, *Ipswich Census Data Trend Analysis, 2014/15* , CDL reference PSCD09

could help to reverse the trend of residents commuting outside of the Borough for employment.

The Ipswich Travel to Work Area (ITTWA) includes parts of Suffolk Coastal, Mid Suffolk and Babergh districts[66]. The travel to work self-containment (i.e. the number of employed residents living and working within an area) within the ITTWA[67] was 85.9% in 2011[68]. The relative self-containment within the ITTWA at 2011 and the high proportion of journeys by Ipswich residents to work destinations within or just outside the Borough boundary suggests that the joint, cross-boundary approach to accommodating growth promoted through Core Strategy Review policies CS2, CS6 and CS7 is an effective and appropriate way in which to integrate and align strategies for housing and jobs growth.

66 Travel to work areas were re-mapped by the ONS in August 2015 http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html

67 WSP, 2016, *Ipswich Census Data Trend Analysis, 2014/15* , CDL reference PSCD09

68 2011 Travel to Work Area Summary Statistics Version 4, ONS, TTWA E30000222 http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html

Appendix 3 – Housing Supply Position Statement

Ipswich Borough Council Local Plan

Housing Supply Position Statement

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Housing Supply Position Statement

Purpose

This paper forms Ipswich Borough Council's analysis of the requirements of paragraph 47 of the National Planning Policy Framework[69] (NPPF) as set out below:

- identify and update annually a supply of specific deliverable[70] sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable[71] sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

The Planning Practice Guidance contains further guidance on identifying and calculating supply.

Housing Supply (1st April 2015)

The calculations below are based upon supply as at 1st April 2015, as shown in the trajectory in Appendix A of this paper. Whilst the trajectory is the same as that used within the 2014/15 Authority Monitoring Report[72] (AMR) the land supply calculations contained in the AMR are based upon the housing requirements of the adopted Core Strategy. It is therefore necessary to revisit these calculations based upon the housing requirements of the Core Strategy Review which is currently subject to Examination.

The trajectory assumes numbers of dwellings on sites will be delivered as set out in policy SP2 of the Proposed Submission Site Allocations plan[73] and Pre-Submission Main Modifications[74] and, in relation to sites with planning permission listed under policy SP3 the position in relation to planning permissions as at 1st April 2015, along with 2,700 dwellings at the Ipswich Garden Suburb by 2031 (as per policy CS7 of the Core Strategy Review).

Supply for years 1-5 and years 6-10 as identified in the 2014/15 AMR is based upon application of Government guidance contained in paragraph 47 of the NPPF as quoted above. For the purposes of the AMR sites have been included within years 1-5 where they have planning permission or where the Council is confident that a site will be delivered during years 1-5 (for example sites in the Council's ownership). This is consistent with the

[69] CLG, 2012, *National Planning Policy Framework,* Core Document Library (CDL) reference NCD18
[70] To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
[71] To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
[72] Ipswich Borough Council, December 2015, *Authority Monitoring Report 2014/15,* CDL reference ICD03a
[73] Ipswich Borough Council, November 2014, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD,* CDL reference SUCD03
[74] Ipswich Borough Council, September 2015, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Pre-Submission Main Modifications,* CDL reference SUCD04

guidance contained in the Planning Practice Guidance[75] (Housing and Economic Land Availability Assessment – paragraph 31) which states 'planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.'

Table 1 shows housing land supply based upon the trajectory as at 1st April 2015 and the housing requirement of the Core Strategy Review.

In accordance with paragraph 47 of the NPPF and the Planning Practice Guidance (Housing and Economic Land Availability Assessment – paragraph 35) it is considered appropriate to apply a 5%, rather than 20%, buffer. The PPG (Housing and Economic Land Availability Assessment - paragraph 35) states that 'the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.' The AMR shows that prior to the recession housing completions were exceeding the requirement. There is no requirement to apply a buffer for years 6-10. In addition, the NPPF refers to the 20% buffer as a means of enabling choice and competition in the market for land. In the case of Ipswich Borough there is a very limited amount of land due to the tightly drawn boundary and applying a 20% buffer would not alter this situation.

The PPG (Housing and Economic Land Availability Assessment – paragraph 35) also states that 'local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.' In the case of Ipswich Borough, the latter approach reflects the policy position set out in CS2, CS6 and CS7 of the Core Strategy Review[76] and therefore the undersupply has been spread across the plan period in the calculations below.

Whilst there is no requirement in the NPPF or in the PPG to apply a discount to supply to reflect the possibility that some anticipated development may not come forward, a 10% discount has been applied to identified supply in Table 2 accompanying policy CS7 in the Core Strategy Review. As a 5% buffer has been applied to the requirement in the calculations below, as per NPPF paragraph 47, it is not considered appropriate to also apply a 10% discount to supply as the purpose of the 5% buffer is to provide choice to enable to the full requirement to be delivered.

In relation to years 11-15, the PPG (Housing and Economic Land Availability Assessment - paragraph 27) states that 'Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15.' Given the supply situation and the proposed planned approach to working with neighbouring authorities, years 11-15 are not addressed within this paper.

As at 1st April 2015, 2,556 dwellings are anticipated to come forward in years 1-5 and 3,460 are anticipated to come forward in years 6-10.

[75] CLG, March 2014 and ongoing, *Planning Practice Guidance,* CDL reference NCD19
[76] Ipswich Borough Council, November 2014, *Proposed Submission Core Strategy and Policies DPD Review,* CDL reference SUCD01
Ipswich Borough Council, September 2015, *Core Strategy and Policies DPD Review Pre-Submission Main Modifications,* CDL reference SUCD02

Table 1: Housing Land Supply as at 1st April 2015

Years 1-5 (2016/17 – 2020/21)	
Annual requirement in Core Strategy Review 2011 - 2031	677
Requirement April 2011 – March 2015 (677 x 4)	2,708
Completions April 2011 – March 2015[77]	1,077
Shortfall April 2011 – March 2015	1,631
Predicted completions April 2015 – March 2016	403
Predicted shortfall April 2015 – March 2016 (677 – 448)	274
Shortfall April 2011 – March 2015 plus predicted shortfall April 2015 – March 2016 = total shortfall April 2001 – March 2015	1,905
Shortfall April 2011 – March 2016 / 15 years = Annual shortfall to be made up between 2016 and 2031	127
Annual shortfall until 2031 (x 5 years[78]) = Shortfall to be added to five year supply	635
Local Plan requirement April 2016 – March 2021 plus 5% buffer[79]	3,554
Requirement April 2016 – March 2021 plus shortfall for next 5 years = Five year requirement	4,189
Five year requirement / 5 years = Annual requirement April 2016 – March 2021	839
Identified supply April 2016 – March 2021	2,556
Identified supply (l) / Annual requirement April 2016 – March 2021 (k) = Housing supply in years	**3.05**
Shortfall years 1-5	**1,633**
Years 6-10 (2021/22 – 2030/31)	
Requirement April 2021 – March 2026 plus past shortfall annual requirement	4,020
Identified supply April 2021 – March 2026	3,460
Shortfall	**560**
Shortfall from years 1-5 to be met during years 6-10 (assuming met over years 6-15)	817
Total shortfall years 6-10	**1,377**

[77] Completions includes assisted living units as per the guidance in national Planning Practice Guidance which states 'Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.' (Reference ID: 3-037-20150320). Care homes have not been included as one space does not necessarily free up one dwelling.
[78] Based upon Planning Practice Guidance that 'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.' (Reference ID: 3-035-20140306). The Proposed Submission core Strategy and Policies Review (November 2014) sets out a commitment to working with neighbouring authorities to meet housing need later in the plan period.
[79] As per NPPF paragraph 47 the 5% is moved forward from later in the plan period and therefore it is assumed that the requirement for years 11-15 would be reduced accordingly.

Appendix A: Ipswich Housing Trajectory as at 1st April 2015

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP004	UC004	Proposed Alloc	Gipping	Bus depot, Sir Alf Ramsey Way	B	Yes	Yes	No	1.1	0	48	48	0										24	24						48
IP005	UC005	Proposed Alloc	Whitton	Former Tooks Bakery, Old Norwich Road	B	Yes	Yes	Yes	2.8	0	101	101	101			50	51													101
IP006	UC006	Proposed Alloc	Gipping	Co-op warehouse, Paul's Road	B	Yes	Yes	No	0.6	0	28	28	0											28						28
IP009	UC009	Alloc 1997	St Margaret's	Part Victoria Nurseries	B	Yes	Yes	No	0.4	0	12	12	0							12										12
IP010a	UC010 part a	Proposed Alloc	Priory Heath	Co-op Depot, Felixstowe Road	B	Yes	Yes	No	2	0	66	66	0							22	22	22								66
IP010b	UC010 part b	Proposed Alloc	Priory Heath	Felixstowe Road	B	Yes	Yes	No	2.8	0	75	75	0									25	25	25						75
IP011a	11/00572	Full (expired) Proposed Alloc	Alexandra	Smart Street/Foundation Street (former Gym & Trim) (Student Accommodation)	B	Yes	Yes	Yes	0.2	0	14	14	14						14											14
IP011b	UC011 part	Proposed Alloc	Alexandra	Smart Street/Foundation Street	B	Yes	Yes	No	0.7	0	50	50	0									25	25							50
IP012	UC012	Proposed Alloc	Alexandra	Peter's Ice Cream, Grimwade St/Star Lane (app ref. 08/00978 awaiting S106 - student accommodation for 397 habitable rooms equivalent to approx 64 dwellings, although unlikley to be implemented)	B	Yes	Yes	No	0.3	0	29	29	0									29								29
IP015	UC015	Proposed Alloc	Gipping	West End Road Surface Car Park	B	Yes	Yes	No	1.2	0	22	22	0								22									22
IP020a	11/00343	Full	St Margaret's	Water Tower, Park Road	G	Yes	Yes	Yes	0.4	3	2	5	0	2																2
IP023	12/00429	Full	Rushmere	Fire Station, Colchester Road (inc Builder's Yard, Sidegate Lane)	B	Yes	Yes	Yes	1.5	41	18	59	9	9	9															18
IP029	UC030	Proposed Alloc	Whitehouse	Land opposite 674-734 Bramford Rd	G	Yes	Yes	Yes	2.3	0	71	71	71					35	36											71
IP031	UC032	Proposed Alloc	Bridge	Burrell Road	B	Yes	Yes	Yes	0.4	0	20	20	0							20										20
IP032	UC033	Proposed Alloc	Whitton	King George V Field, Old Norwich Rd	G	Yes	Yes	No	3.5	0	99	99	0							33	33	33								99

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP033	UC034	Proposed Alloc	Whitehouse	Land at Bramford Road (Stocks site)	B	Yes	Yes	No	2	0	46	46	0							23	23									46
IP037	UC038	Proposed Alloc	Holywells	Island site	B	Yes	Yes	No	6	0	271	271	0												54	54	54	54	55	271
IP038	10/00867	Full	Bridge	Land between Vernon Street & Stoke	B	Yes	Yes	Yes	1.4	275	111	386	0	111																111
IP039a	UC040	Proposed Alloc	Bridge	Land between Gower Street and Great Whip Street	B	Yes	Yes	No	0.5	0	43	43	0										21	22						43
IP040 & IP041	UC041 & UC042	Proposed Alloc	Alexandra	Civic Centre area, Civic Drive (demolition & new builds of similar number)	B	Yes	Yes	Yes	1.3	0	0	0	0						0											0
IP042	12/00700 on part site	Outline	Holywells	Land between Cliff Quay and Landseer Road	B	Yes	Yes	Yes	1.6	0	27	27	27				27													27
IP043	UC044	Proposed Alloc	Alexandra	Commercial Buildings and Jewish Burial Ground site, Star Lane	B	Yes	Yes	No	0.7	0	50	50	0							25	25									50
IP047	08/00953	Full (expired) Proposed Alloc	Alexandra	Land at Commercial Road	B	Yes	Yes	Part	3.1	0	103	103	0							25	26	26	26							103
IP048	UC051	Proposed Alloc	Alexandra	Mint Quarter	B	Yes	Yes	No	1.4	0	72	72	0							36	36									72
IP052	12/00811	Full / Proposed Alloc	Alexandra	Land between Lower Orwell Street and Star Lane (app ref. 12/00811 approved - student accommodation for 304 habitable rooms equivalent to approx 118 units, although unlikley to be implemented)	B	Yes	Yes	No	0.4	0	29	29	0									29								29
IP054	UC057	Proposed Alloc	Alexandra	Land between Old Cattle Market and Star Lane	B	Yes	Yes	No	1.7	0	28	28	0									28								28
IP059a	UC062	Proposed Alloc	Gipping	Elton Park Industrial Estate, Hadleigh Road	B	Yes	Yes	Yes	2.6	0	105	105	70					35	35	35										105
IP059b	10/00823	Full	Gipping	Arclion House, Hadleigh Road	B	Yes	Yes	Yes	0.3	0	18	18	18					18												18
IP061	UC064	Proposed Alloc	Gipping	School Site, Lavenham Road	G	Yes	Yes	Yes	1.1	0	30	30	30				30													30
IP065	13/00368	Full	Priory Heath	Former 405 Club, Bader Close	G	Yes	Yes	Yes	3.2	5	103	108	0	103																103
IP066	UC069	Proposed Alloc	Holywells	JJ Wilson, White Elm Street	B	Yes	Yes	No	0.3	0	18	18	0							18										18

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP074	13/00226	Full	Alexandra	Church, Reeves Yard And The Black Barn , Upper Orwell Street	B	Yes	Yes	Yes	0.1	0	12	12	12					12												12
IP080	UC085	Proposed Alloc	Bridge	240 Wherstead Road	B	Yes	Yes	Yes	0.5	0	27	27	27						27											27
IP084a	14/00810	Prior Approval	Alexandra	St Edmund House, Rope Walk	B	Yes	Yes	Yes		0	74	74	74			37	37													74
IP086a	13/01110	Prior Approval	Alexandra	Eastgate House, 45 Carr Street	B	Yes	Yes	Yes		0	25	25	25		25															25
IP088	12/00114	Full	St John's	79 Cauldwell Hall Road	B	Yes	Yes	Yes	0.3	0	16	16	16			16														16
IP089	UC096	Proposed Alloc	Alexandra	Waterworks Street	B	Yes	Yes	No	0.3	0	23	23	0													23				23
IP090	11/00334	Full (expired) Proposed Alloc	Whitehouse	Europa Way	B	Yes	Yes	No	1.4	0	18	18	0							18										18
IP096	UC109	Proposed Alloc	Gipping	Car Park Handford Rd East	B	Yes	Yes	No	0.2	0	20	20	0								20									20
IP098	UC111	Proposed Alloc	Holywells	Transco, south of Patteson Road	B	Yes	Yes	No	0.6	0	51	51	0										25	26						51
IP105	UC129	Alloc 1997	Westgate	Depot, Beaconsfield Road	B	Yes	Yes	No	0.3	0	15	15	0								15									15
IP109	12/00192	S106	Bixley	The Drift, Woodbridge Road	B	Yes	Yes	Yes	0.4	0	13	13	13					13												13
IP116 part	14/00721	S106	St John's	St Clements Hospital Grounds	B	Yes	Yes	Part	6.6	0	127	127	75				25	25	25	26	26									127
IP116 part	14/00721	S106	St John's	St Clements Hospital Grounds	G	Yes	Yes	Part	5.3	0	100	100	60				20	20	20	20	20									100
IP129	12/00654	Outline	Alexandra	BT Depot, Woodbridge Road	B	Yes	Yes	Yes	1.1	0	39	39	39					19	20											39
IP130	10/00871	Full	Westgate	South Street (74-76 Norwich Road)	B	Yes	Yes	Yes	0.4	0	11	11	0							11										11
IP131	UC245	Proposed Alloc	St John's	45 Milton Street	B	Yes	Yes	No	0.3	0	13	13	0								13									13
IP132	10/00343	Full (expired) Proposed Alloc	Alexandra	Former St Peters Warehouse Site, 4 College Street / Bridge Street (Northern Quays west)	B	Yes	Yes	Yes	0.2	0	73	73	73					36	37											73

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP133	10/00418	Full (expired) Proposed Alloc	Bridge	South of Felaw Street	B	Yes	Yes	No	0.4	0	33	33	0									33								33
IP135	11/00247	Outline (expired) Proposed Alloc	Westgate	112 - 116 Bramford Road	B	Yes	Yes	Yes	0.2	0	14	14	14						14											14
IP136	UC251	Proposed Alloc	Alexandra	Silo, College Street	B	Yes	Yes	No	0.2	0	48	48	0							24	24									48
IP142	UC259	Proposed Alloc	Holywells	Land at Duke Street	B	Yes	Yes	No	0.4	0	26	26	26						26											26
IP150a (part)	08/00246 14/00564	Reserved Matters & Full	Priory Heath	Land south of Ravenswood (sites S & T)	B	Yes	Yes	Yes		48	47	95	32	15	32															47
IP150a (part)	14/00435	Pending decision (call-in)	Priory Heath	Land south of Ravenswood (sites U, V and W)	B	Yes	Yes	Yes		0	94	94	94		47	47														94
IP161	07/00118	Full	St Margaret's	2 Park Road	B	Yes	Yes	Yes	0.4	0	13	13	13		13															13
IP165	13/00943	Outline	Whitehouse	Eastway Business Park, Europa Way	B	Yes	Yes	Yes	2.1	0	94	94	94				31	31	32											94
IP168	05/01010	Full	Stoke Park	Stoke Park Drive	B	Yes	Yes	Yes	0.3	0	11	11	0							11										11
IP169	12/00087	Full	Bridge	23-25 Burrell Road	B	Yes	Yes	Yes	0.1	0	14	14	14				14													14
IP172	UC088 08/00511	Full (expired) Proposed Alloc	St Margaret's	15-19 St Margaret's Green	B	Yes	Yes	Yes	0.1	0	9	9	0							9										9
IP176	12/00101	Full	St Margaret's	7-9 Woodbridge Road	B	Yes	Yes	Yes	0.1	0	14	14	14				14													14
IP188	13/00069 part	Proposed Alloc	Bridge	Websters Saleyard site, Dock Street	B	Yes	Yes	Part	0.1	0	9	9	3			3							6							9
IP200	05/00819, 11/00507 (exp), 11/00432, 13/00346	Full	Bridge	Griffin Wharf, Bath Street	B	Yes	Yes	Yes	4.7	128	108	236	108		3		36	36	33											108
IP205	02/01241	Full	Alexandra	Burton's, College Street	B	Yes	Yes	Yes	0.2	71	125	196	125				41	42	42											125

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP206	04/00313	Full	Alexandra	Cranfields	B	Yes	Yes	Yes	0.7	197	140	337	94	46	47	47														140
IP211	05/00296 07/00357 07/00358 09/00130	Full	Alexandra	Regatta Quay, Key Street	B	Yes	Yes	Yes	0.9	116	151	267	151		75	76														151
IP214	10/00805	Lapsed PP	Alexandra	300 Old Foundry Road	B	Yes	Yes	Yes	0	0	11	11	0							11										11
IP215	11/00127, 14/00206	Full & Prior Approval	Alexandra	7-15 Queen Street	B	Yes	Yes	Yes	0.1	0	19	19	11	8	11															19
IP221	06/01007	Full (expired) Proposed Alloc	Whitehouse	Flying Horse PH, 4 Waterford Road	B	Yes	Yes	No	0.4	0	12	12	0												12					12
IP223	07/00123, 09/00612	Full (both)	Alexandra and St Margaret's	Hayhill Road/Woodbridge Road	G	Yes	Yes	Yes	6.6	249	55	304	26	29	26															55
IP226	04/01173	Pending	Holywells	Helena Road	B	Yes	Yes	No	1.9	0	566	566	0												113	113	113	113	114	566
IP234	06/01176	Full	Gipping	Gibbons Street	B	Yes	Yes	Yes	0	0	6	6	6		6															6
IP242	12/00916	Full	Bridge	31 Stoke Street	B	Yes	Yes	Yes	0	0	6	6	6			6														6
IP245	15/00321	Full Proposed alloc	Alexandra	12-12a Arcade Street	B	Yes	Yes	Yes	0.1	0	7	7	7			7														7
IP246	09/00213	Full	Westgate	158-160 London Road	B	Yes	Yes	Yes	0.1	-1	14	13	14		14															14
IP249	13/00067	Full	Westgate	131 Bramford Road	B	Yes	Yes	Yes	0	0	7	7	7			7														7
IP253	12/00008	Full	Alexandra	Electric House, Lloyds Avenue	B	Yes	Yes	Yes	0	0	13	13	13		13															13
IP256	IP256	Proposed Alloc	Castle Hill	Artificial Hockey Pitch, Ipswich Sports Club, Henley Road	B	Yes	Yes	Yes	0.6	0	18	18	18						18											18
IP264	13/00372	S106	Alexandra	28-32 Tacket Street	B	Yes	Yes	Yes	0.1	0	16	16	16			16														16
IP265	14/00376	Full	Whitehouse	Ulster Avenue (Lockup garages and amenity land to rear of 15 to 49)	B	Yes	Yes	Yes	0.4	0	22	22	11	11	11															22

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted/allocated	Total number of dwellings on site	Number of residual which are expected to be completed in 5 years	2015/16 Current Year	2016/17 (Yr 1)	2017/18 (Yr 2)	2018/19 (Yr 3)	2019/20 (Yr 4)	2020/21 (Yr 5)	2021/22 (Yr 6)	2022/23 (Yr 7)	2023/24 (Yr 8)	2024/25 (Yr 9)	2025/26 (Yr 10)	2026/27 (Yr 11)	2027/28 (Yr 12)	2028/29 (Yr 13)	2029/30 (Yr 14)	2030/31 (Yr 15)	Total Identified Supply
IP266	13/01073	Prior Approval	Gipping	Western House, Dunlop Road	B	Yes	Yes	Yes	0	0	50	50	25	25	25															50
IP267	14/00587	Prior Approval	Alexandra	16 - 18 Princes Street	B	Yes	Yes	Yes	0.1	0	33	33	17	16	17															33
IP268	13/00625	Full	Gipping	Burlington Road	B	Yes	Yes	Yes	0.3	1	7	8	7			7														7
IP269	14/00281	Full	Westgate	110a Victoria Street	B	Yes	Yes	Yes	0.2	0	8	8	8			8														8
IP270	13/01108	Prior Approval	Alexandra	15 St Helens Street	B	Yes	Yes	Yes	0	0	5	5	5		5															5
IP271	14/00591	Prior Approval	Alexandra	2 - 3 Friars Courtyard, 30 - 32 Princes St	B	Yes	Yes	Yes	0	0	6	6	6		6															6
IP272	14/00939	Full	Alexandra	72 Foundation Street	B					0	10	10	10			10														10
IP273	14/00909	Full	Alexandra	Rear of 29 to 37 Spring Road	G	Yes	Yes	Yes	0.2	0	6	6	6		6															6
IP274	14/00874	Full	Whitton	Old Norwich Road (rear of Maypole PH)	G	Yes	Yes	Yes	0.3	0	7	7	7			7														7
IGS	14/00638	Pending outline		Land west of Westerfield Road and south of Railway Line	G	Yes	Yes	Part		0	815	815	316			1	105	105	105	100	100	100	100	99						815
IGS				Broad Location North Ipswich	G	Yes	Yes	Part		0	1,885	1,885	63					1	62	200	200	200	200	200	199	173	150	150	150	1,885
Various	Various			Sites with less than 5 units (6 under construction)	G	Yes	Yes	Yes	1.8	2	31	33	25	6	5	5	5	5	5											31
Various	Various			Sites with less than 5 units (36 under construction)	B	Yes	Yes	Yes	4.7	-5	112	107	90	22	22	17	17	17	17											112
Windfall				Small windfall sites (less than 10 dwellings)	B					0	900	900	300		60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	900
Windfall				Large windfall sites (10+ dwellings)	B					0	900	900	0							90	90	90	90	90	90	90	90	90	90	900
Total												9,993	2,556	403	478	427	513	510	628	829	755	700	602	574	528	513	467	467	469	8,863
Brownfield Total													1,952	263	441	414	353	344	400	476	402	367	302	275	329	340	317	317	319	5,659
Greenfield Land													604	140	37	13	160	166	228	353	353	333	300	299	199	173	150	150	150	3,204