IBC responses to Inspector questions arising during Matters 6 and 3 on days 5 and 6 (9th and 10th December 2020) of the Ipswich Local Plan Review Examination Hearings.

1. Local Examples of sustained high housing delivery.

In the 'Ipswich Local Plan Review: Matter 3 Housing Supplementary Evidence' paper reference K6 (section 3), the Council refers to evidence of high rates of housing delivery at the Chesterwell and Kingswood Heath sites in north Colchester and at Ravenswood, south-east Ipswich.

Whilst high delivery in a single year was cited in the document K6, the evidence also shows that high delivery rates were sustained over several years. Table A below indicates that average delivery over four years in Colchester peaked at 292 dwellings in one year and averaged 238 dwellings per annum.

Table B shows that at Ravenswood, between 2000/01 and 2007/8 when there were multiple outlets, delivery peaked at 226 dwellings per annum and two years achieved delivery in excess of 200 dwellings per annum. The eight-year average was 132 dwellings per annum. The scale of Ipswich Garden Suburb is significantly greater than Ravenswood at 3,500 dwellings total compared with 1,190 dwellings.

Table A Local example – Colchester (combined site total: 2,578 dwellings).

Site Name	Planning Ref.	Dwellings	2016/17	2017/18	2018/19	2019/20
Chesterwell (1600 dwellings)	121272 & 150473	1600	98	150	146	62
Kingswood Heath (former Severalls Hospital site)	100502	248	51	35	0	0
(248 dwellings Phase 1, 730 dwellings Phase 2)	152733	730	0	98	146	167
			149	283	292	229

Source: Colchester Borough Council Authority Monitoring Reports 2016/17 to 2019/20

Development	Developer	Outline PP	Reserved	Discharge of	Commencement	1 st	Build
	-		Matters/Full	Conditions		Completion	Rate
							(Ave.)
Chesterwell	Mersea Homes	July 2014	March 2015	2014 onwards	2015	2016	150
(1600 dwellings)	Countryside	July 2014	October 2015	2014 onwards	2015	2016	
Severalls Phase	Taylor Wimpey	2015	April 2016	2015 onwards	2016	2017	
2 (730 dwellings)	Bloor Homes	2015	April 2016	2015 onwards	2016	2017	98
	Bellway	2015	April 2016	2015 onwards	2016	2017	

Source: Colchester Borough Council Housing Position Statement 2020

Table B Local example - Ravenswood, Ipswich (combined site total: 1,190 dwellings).

	Bellway						
	Urban						
	Renewal/		Bellway				
	Bellway		Urban	Bellway	Bellway	Per-	
	Homes	Orwell	Renewal	Homes	Homes	simmon	
Year	(Essex)	HA	Southern	(Essex)	Ltd	Homes	Total
1999/2000	5						5
2000/2001	154	46					200
2001/2002	57		3				60

2002/2003	4		140	82			226
2003/2004			25	90	31		146
2004/2005				97	82		179
2005/2006				59	26		85
2006/2007				31	54		85
2007/2008				2	72		74
2008/2009						23	23
2009/2010						12	12
2010/2011						22	22
2011/2012						3	3
2012/2013						10	10
2013/2014						8	8
2014/2015						5	5
2015/2016						11	11
2016/2017						25	25
2017/2018						11	11
Total	220	46	168	361	265	130	1190

2. Contribution of Care Home places to Housing Land Supply

The Planning Practice Guidance (Paragraph: 035 Reference ID: 68-035-20190722 revised 22 July 2020) states that local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data. (Planning Practice Guidance on Housing for Older and Disabled People. Paragraph: 016a Reference ID: 63-016a-20190626 revised 26 June 2019).

Census 2011. Table CT0774

Average adults per household	,
Households in Ipswich	57,294
Persons over 16 in households in Ipswich	101,680

In calculating the number of dwellings released in the housing market the Council will therefore apply a ratio of 1.8 to 1 for all new care home places meaning that for every 1.8 residents in an institution the equivalent of 1 dwelling will be assumed.

The additional contribution to the Ipswich Housing Land Supply is 100 dwellings at 1st April 2020 (delivery 79 during current year and 21 year 1). This is shown in Table C.

Table C Contribution of Care Home places to Ipswich Housing Land Supply

				ipomiem m		<u> </u>		74.7			
Site Ref.	Planning Application Reference	Address	Total number of bed- rooms	Equivalent dwellings (1 dwelling per 1.8 rooms)	2020/21 (Current Year)	2021/22 (Year 1)	2022/23 (Year 2)	2023/24 (Year 3)	2024/25 (Year 4)	2025/26 (Year 5)	Evidence for Delivery
IP394	18/00064/FUL	Henley House, Henley Road	66	37	37						Complete 10/11/2020
IP090	17/00076/FUL	Silver Birch Care Home, 3 Europa Way	75	42	42						Complete 18/8/2020
IP280	14/01039/FUL 17/00489/VC	Phases 4 and 5, Westerfield House, Humber Doucy Lane	38	21		21					Commenced and SoCG with developer: I20
			179	100	79	21	0	0	0	0	

For illustrative purposes, the five year housing land supply calculation based on stepping of 300dpa for six years and 540dpa for twelve years when care beds are included in the supply is shown in Table D.

Table D Five year housing land supply at 1st April 2020 including care beds

–	i ive year neading land capply at 1 April	. Loto illolaali
A	Plan Requirement 2018 – 2036 460x18	8280
В	Net additional dwellings delivered 1st April 2018 - 31st March 2021 223+421+327	971
С	Shortfall = Requirement (2018/19 – 2020/21) 900 (3x300) – B 971 = 71 surplus	-71
D	5 year requirement based on stepped trajectory 300pa x 3 yrs (900) and 540pa x 2 yrs (1080)	1980
E	5 Year requirement + C	1,909
F	Add 20% buffer (E x 1.2)	2,291
G	Annual requirement for 5 years (F/5)	458.16
Н	Supply 2021/22 to 2025/26	2449
T	5 year calculation	5.35

3. Five Year Housing Land Supply updated calculation (stepping of 300 dpa and 540 dpa) reflecting most recent amendments to the five year trajectory in document K6

An updated illustration of the five-year housing land supply calculation has been requested to reflect the five year supply housing trajectory included in the 'Ipswich Local Plan Review: Matter 3 Housing Supplementary Evidence' paper reference K6. This is provided in Table E below. It can be seen that, at adoption and incorporating a 20% buffer, the Council would have a housing land supply of 5.09 years.

A correction has been made to the five year supply data provided in the Supplementary Housing Evidence (document reference K6):

• Two dwellings were omitted in error at IP280 Westerfield House (raising the year 3 total from 48 to 50) and the 7 completions at this site shown in the current year 2020-21 should be shown in year 1 2021-22.

These two amendments ensure the trajectory aligns with the Westerfield House Statement of Common Ground reference I20. They do not change the 5.09 years housing land supply calculation.

Table E Five year housing land supply calculation at 1st April 2020 based on stepping of 300dpa for six years and 540dpa for twelve years

A	Plan Requirement 2018 – 2036 460x18	8280
В	Net additional dwellings delivered 1st April 2018 - 31st March 2021 223+421+248	892
С	Shortfall = Requirement (2018/19 – 2020/21) 900 (3x300) – B 892 = 8 deficit	8
D	5 year requirement based on stepped trajectory 300pa x 3 yrs (900) and 540pa x 2 yrs (1080)	1980
Е	5 Year requirement + C	1,988
F	Add 20% buffer (E x 1.2)	2,386
G	Annual requirement for 5 years (F/5)	477.12
Н	Supply 2021/22 to 2025/26	2428
I	5 year calculation	5.09