



Ipswich Borough Council Local Plan Review 2018-2036 Examination

Hearing Statement Matter 3

Boyer

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1. INTRODUCTION

- 1.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 1.2 Ipswich School is actively seeking to engage in the preparation of the Ipswich Local Plan which will guide the development of the Borough up to 2036. Ipswich School is seeking to promote and use their land holdings in a more effective manner to secure the long term future of the school which is a registered charity.
- 1.3 In its 600 year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for the education of boys in the town, but unlike many other private schools Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives. As a charity, Ipswich School has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The School see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils.
- 1.4 Ipswich School has submitted representations to previous stages of Local Plan preparation and is a key partner within the Ipswich Garden Suburb (IGS), through landownership. Representations relate to the need to secure greater flexibility for the school and its land holdings to ensure that the needs of the school can be met in the long term.
- 1.5 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich School, due primarily to the cost implications or relocating facilities from the existing site at Notcutts Field (which is within the area designated for IGS).
- 1.6 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough but also provides greater assurance for Ipswich School through a positive and appropriate allocation.
- 1.7 Parcels of land are currently allocated but these do not provide the most appropriate solution for the school and are not considered to be justified and effective allocations as they do not match the aspirations of the land owner as explained in more detail below and other hearing statements submitted on behalf of Ipswich School.
- 1.8 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocation of land for Sport and Open Space at Tuddenham Road is undeliverable.
- 1.9 This hearing statement relates to Matter 3: Housing Provision.

2. MATTER 3: HOUSING PROVISION

- 2.1 On behalf of Ipswich School, a number of questions from the Inspector Matters, Issues and Questions have been addressed below. For ease of reference the question has been provided in bold and italics font with the response below.
- 2.2 This hearing statement focuses on Matter 3: Housing Provision but should also be read alongside hearing statements submitted for Matter 2: Spatial Strategy and Matter 6: Site Allocations.

36. On what basis does the Council consider, in paragraph 8.106 of the CSP, that it should not plan for a higher level of housing need than the standard method LHN suggests? Given the strategic role of Ipswich in the Ipswich Economic Area, should the Council be planning for a higher figure to provide an uplift to support economic growth?

- 2.3 The Council is seeking to meet the identified housing need for the Borough as set out in the Government's standard method to quantify housing need. This equates to a total of 8,010 dwellings over the plan period at an annualised average of 445 dwellings per annum. Although the Council are technically correct in planning to the number of units which result from the standard method, it is noted that all housing numbers are to be viewed as a minimum and as local planning authority, the Council can plan for a higher number where required.
- 2.4 Planning for a higher number and ensuring that sufficient land is made available for an increased number, is considered to be best practice and demonstrates a local planning authority's commitment to the government objective of "significantly boosting housing supply". It will also enable the Council, over the plan period to provide greater choice of accommodation for the local community to ensure that local needs are met.
- 2.5 Ipswich Borough along with its neighbouring authorities has prepared a Statement of Common Ground across the Ipswich Strategic Planning Area (document A21). This collaborative approach is welcomed by Ipswich School and demonstrates that each local authority is committed to meeting its own needs within its own administrative area. However, it is also noted that this does not limit the opportunity for an increased housing number to be provided.

- 2.6 Ipswich School is proud of its long term commitment to Ipswich and the support it provides to the local economy with regards to education provision, job opportunities but also through the positive impact students from the school can have in the local area. As a charity, Ipswich School is committed to opening up access to the School to any worthy pupil, regardless of their ability to pay. The School see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils. Managing assets carefully in order to be able to deliver charitable objectives is therefore fundamental to the School.
- 2.7 As demonstrated within the Council's evidence base, Ipswich is a key contributor to the Suffolk economy and is also home to many employment and training opportunities and therefore every opportunity should be taken to plan for increased residential units which can support the economic uplift.
- 2.8 It is considered that allocating land at Tuddenham Road for residential use, as opposed to Sport and Open Space use would be a positive allocation and one that meets the strategy being promoted through this Local Plan. Land at Tuddenham Road is adjacent to the Ipswich Garden Suburb and also the allocation at Humber Doucy Lane and therefore would provide further residential opportunities alongside those already prepared by the Borough Council. The site at Tuddenham Road has the potential to provide opportunities for connectivity (through walking and cycling links) to Ipswich Garden Suburb and create a sense of place through comprehensive development as well as mitigating any potential shortfall in housing numbers across the Borough.

39. Do the Council's assumptions for a 10% slippage in the delivery of housing from sites with planning permission or with resolutions to grant subject to a S106 agreement make reasonable allowance for the non-implementation of permissions?

- 2.9 The Council have included a 10% slippage in the housing numbers with the intention that this reflects reality on the ground. However the 10% slippage is considered to be too small and should be increased to reflect the local situation and provide a greater choice and variety of sites across the Borough.
- 2.10 Ipswich Borough has struggled in respect of housing delivery and the 10% figure incorporated to allow for slippage should be increased to provide a greater allowance and flexibility for the housing market. By increasing the figure associated with slippage of delivery, it is evident that additional sites, which accord with the Council's strategy, such as land at Tuddenham Road should be allocated to ensure the Council can meet its 5 year housing land supply requirement.
- 2.11 The most recent results of the Government's Housing Delivery Test (published in February 2020), record that Ipswich Borough delivered 611 net additional dwellings over the preceding 3 year period against a requirement of 1,319 dwellings, which represents a rate of just 46% delivery. Based on the results of the Housing Delivery Test, it is clear that a 10% slippage is not reasonable and that the allowance for non-implementation of permissions should be increased.

41. What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; and number of sales outlets?

- 2.12 Ipswich School identified a number of sites in representations submitted in March 2020 questioning the delivery of various sites allocated in the Local Plan. Further details have been provided in the hearing statement prepared for Matter 6.

42. Overall does the Plan allocate sufficient land to ensure the housing requirement of the Borough will be met over Plan period, in particular from 2031 onwards?

- 2.13 Ipswich School does not consider that sufficient land has been provided across the Borough to meet the housing requirement over the plan period. As outlined in Ipswich School's representations, the Council is relying on allocations which are historic and were originally identified in Local Plan documents dating back to 1997.
- 2.14 In accordance with the National Planning Policy Framework, paragraph 67 outlines that strategic policy making authorities (such as Ipswich Borough) should have a clear understanding of the land available within their area. Paragraph 67 (a) makes reference to deliverable sites which are defined in the glossary as "sites for housing 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." Paragraph 67 (b) makes reference to developable sites which are defined in the glossary as "sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."
- 2.15 Clearly a number of the sites within the allocations identified in the Local Plan fail to meet the definition of deliverable and developable as described within the National Planning Policy Framework and therefore should be removed with additional sites (that meet the definition – including Ipswich School's Tuddenham Road site) included within the Local Plan as allocations.
- 2.16 Alongside the concern raised in respect of other site allocations, Ipswich School also highlight that the release of land at Notcutts Field into the Ipswich Garden Suburb is also uncertain at this time due to the viability of the redevelopment required. The sale of Notcutts Field on its own is highly unlikely to raise the funds required to relocate the sports facilities on a new site to a modern standard. Therefore with Notcutts Field unlikely to be released due to viability issues over the plan period, the Ipswich Garden Suburb will fall short of delivering the overall quantum of development expected. Allocation of land at Tuddenham Road for residential use will potentially enable release of Land at Notcutts Field.
- 2.17 Should the Local Plan be adopted with the allocations currently identified, Ipswich Borough will continue to struggle to meet the average housing requirement of 445 units per year as planned. Therefore, the Local Plan will not meet the government objective to "significantly boost housing supply" as outlined in the National Planning Policy Framework paragraph 59.

46. The Topic Paper on Reviewing Ipswich Housing Figure [D52] calculates the supply of deliverable sites in the Plan is 5.09 years of the annual housing requirement for the first 5 years of the Plan period. Is there a need for and are there any additional sites which could contribute to the first 5 years' supply post adoption should delivery of any of the allocated sites stall in the first 5 years?

- 2.18 The Council's Topic Paper on reviewing Ipswich Housing Figure (D52) is welcomed and outlines the Council's position with regards to housing supply and takes into account information from the most recent monitoring period.
- 2.19 The practice of a stepped housing target is understood and in the case of the Ipswich Local Plan is considered reasonable given the current focus on "brownfield sites delivering higher density development" as outlined in paragraph 31 of the Council's Topic Paper (D52). For the stepped approach to be effective, it will be essential that the Council carefully monitor housing delivery across the Borough and react accordingly to any under (or over) delivery that takes place. The purpose of a stepped target is to accommodate longer lead in times for strategic sites which are anticipated to come forward later in the plan period. Should monitoring result in delays in the early part of the plan period, it will be imperative that the Council takes swift action and steps up the housing target to maintain supply.
- 2.20 Ipswich School, has concerns about the approach of the Council and the delivery of housing over the plan period. It is clear that in order to meet local housing need the Council need to identify additional sites for development over the plan period. Allocating land at Tuddenham Road for residential use will make a significant contribution to the Council's supply over the plan period.
- 2.21 Although it is appreciated that delivery would be expected later in the plan period, to align with the phasing approach taken for the Ipswich Garden Suburb and land at Humber Doucy Lane. It is considered reasonable to include land at Tuddenham Road as a residential allocation to ensure greater choice and opportunities across Ipswich over the plan period.
- 2.22 Notwithstanding the phasing requirements for sites due to come forward later in the plan period. The National Planning Policy Framework accepts that sites identified for development later in the plan period can come forward earlier when necessary and the Ipswich Local Plan should have that flexibility outlined clearly.
- 2.23 In order to ensure that a sufficient supply of sites are identified for the plan period, land at Tuddenham Road should be re allocated for residential use which will provide greater flexibility and also ensure that the strategic allocations of Ipswich Garden Suburb and land at Humber Doucy Lane can be linked in a more appropriate and plan led manner.

47. Alternatively, should the proposed stepping of the housing requirement be revisited to reflect the anticipated trajectory in the delivery of housing sites over the plan period?

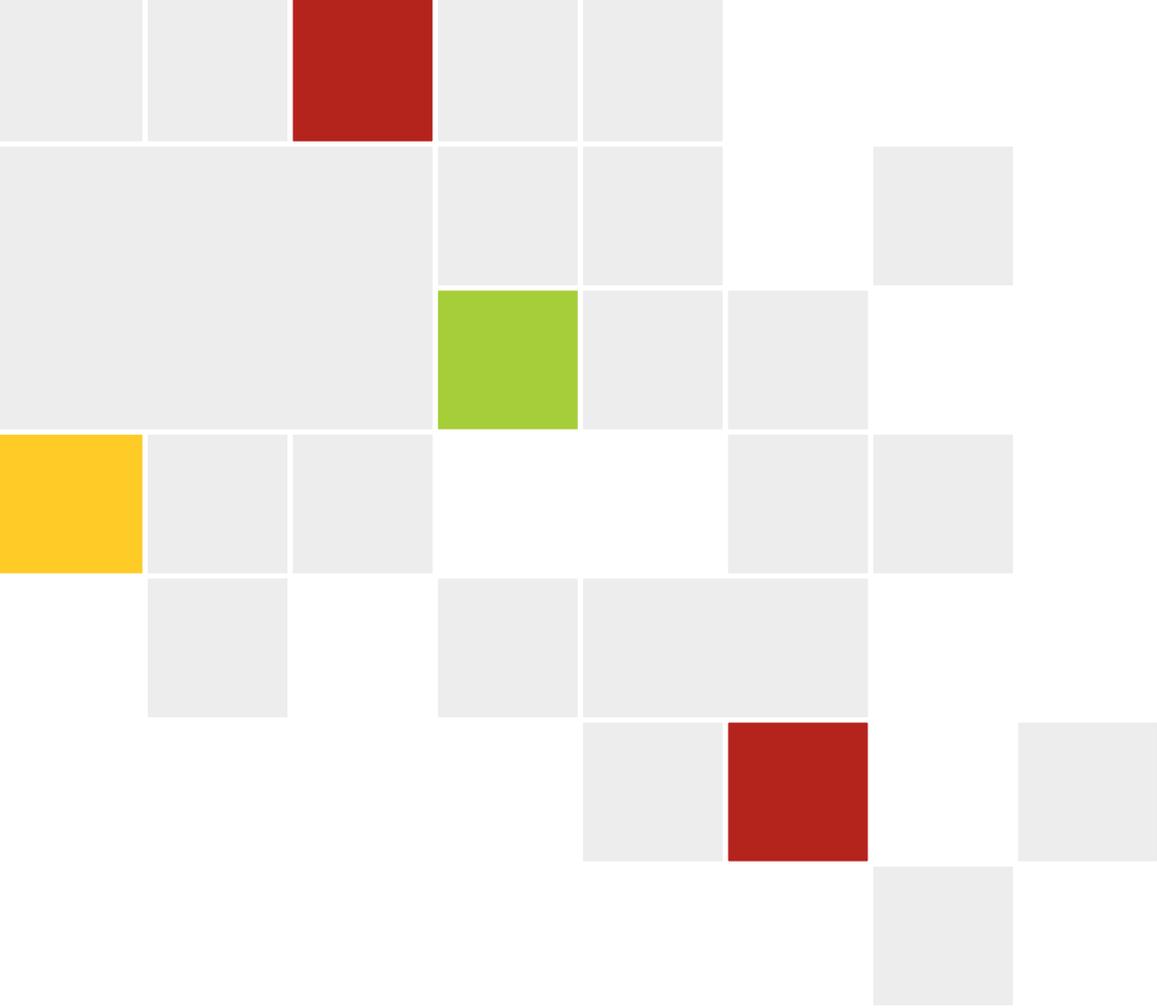
- 2.24 The Local Plan needs to provide certainty for the local community, landowners and other stakeholders such as service providers and the anticipated trajectory of housing delivery across the Borough needs to reflect opportunities available.
- 2.25 Ipswich School encourages the Council to reconsider the anticipated trajectory of housing across the Borough in light of land at Tuddenham Road being made available for residential development.
- 2.26 The land is currently identified as “Land Allocated for Sport Use” which is not currently considered viable and therefore is uncertain and should not be included within the Local Plan. Through allocating the site for residential development, the land can play a key role in ensuring that the housing requirement for the Borough is met over the plan period, thus requiring a change to the housing trajectory.

48. If we were to conclude that a 5-year supply of specific, deliverable housing sites would not exist on adoption, what would be the most appropriate way forward for the Plan?

- 2.27 There is a real danger of the Local Plan not being able to identify a 5 year supply of specific, deliverable housing sites upon adoption, unless additional sites which meet the agreed strategy are allocated within the emerging plan.
- 2.28 As outlined in the original representations from Ipswich School, the difficulties that the Council has experienced with regards to delivery are well understood within the local area.
- 2.29 In light of the Covid19 pandemic, the construction industry will need greater flexibility and choice of sites to deliver the number of residential units required to meet local demands. By ensuring that additional sites are identified, the Council will be able to maintain a specific, deliverable supply of housing sites and demonstrate a five year supply.

3. CONCLUSION

- 3.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 3.2 Ipswich School has not attempted to answer every question in relation to this matter, but has instead focussed on those relevant to the representations submitted in March 2020 and the interest of the school as an education provider, charity and landowner.
- 3.3 This hearing statement focuses on the issues identified by the Inspectors under Matter 3: Housing Provision. It should also be read in conjunction with other hearing statements submitted on behalf of Ipswich School under Matter 2: Spatial Strategy and Matter 6: Site Allocations.
- 3.4 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich school, due primarily to the cost implications or relocating facilities from the existing site at Notcutts Field.
- 3.5 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough but also provides greater assurance for Ipswich School through a positive and appropriate allocation.
- 3.6 As a charity, Ipswich School has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The School sees this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils. Ensuring that land is allocated for the most appropriate uses will ensure the charitable objectives of the School are maintained for the community.
- 3.7 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocation of land for Sport and Open Space at Tuddenham Road is undeliverable. Ipswich School respectfully request that the allocation is revised to residential uses as this meets the Council strategy and is considered to be a site which will deliver housing opportunities over the plan period.
- 3.8 Ipswich School would welcome the continued participation in the preparation of the Ipswich Local Plan to consider any amendments to policy wording and supporting text that relates to the land holdings of the School following the closure of the hearing sessions.



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