
WRITTEN STATEMENT

IPSWICH BOROUGH COUNCIL CORE STRATEGY AND POLICIES DPD REVIEW

EXAMINATION HEARING SESSIONS JUNE 2016

MATTER 4a – RESIDENTIAL AND SUSTAINABLE DEVELOPMENT POLICIES AND GENERAL DEVELOPMENT PRINCIPLES

PREPARED ON BEHALF OF
CREST NICHOLSON

May 2016

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AND GENERAL DEVELOPMENT PRINCIPLES**

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1.0 INTRODUCTION

a) Matter 4a

- 1.1 This Written Statement has been prepared on behalf of Crest Nicholson in respect of Matter 4a of the Inspector's Stage 2 Matters and Questions for the Core Strategy and Policies DPD Review (CSP DPD Review).
- 1.2 Crest Nicholson has control of the northern parcel of Ipswich Garden Suburb (IGS) known as 'Henley Gate', which is allocated under Policy CS10 of CSP DPD for mixed-use development. An IGS Supplementary Planning Document (SPD) has been prepared by Ipswich Borough Council (IBC), and interim 'adoption' took place in September 2014. Full adoption of the SPD will not take place until the revised CSP DPD has been adopted. This Statement is prepared with due regard to the allocation of the Ipswich Garden Suburb (IGS) under Policy CS10 of the CSP DPD Review.
- 1.3 Crest Nicholson is in the process of preparing an Outline planning application for Henley Gate, which is due to be submitted in June 2016.
- 1.4 Matter 4a relates the soundness of the policies within the CSP DPD Review and Site Allocations and Policies (incorporating IP-One Action Area Plan) Development Plan Document (SAP DPD) relevant to residential and sustainable development and general development principles.
- 1.5 This Hearing Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework (NPPF), namely:
- **Positively prepared** – plans should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – plans should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – plans should be deliverable over their period and be based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – plans should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.0 RESPONSE TO MATTER 4a – RESIDENTIAL AND SUSTAINABLE DEVELOPMENT POLICIES AND GENERAL DEVELOPMENT PRINCIPLES

a) Overview

Para 4.1 – Are the policies for residential and sustainable development and general development principles soundly-based? If you contend that they are not how should they be modified?

- 2.1 **Policy CS1 – Sustainable Development – Climate Change** – Part j. of this Policy seeks to support the implementation of “Travel Ipswich”, to promote 15% modal shift to reduce carbon emissions. This is supported.
- 2.2 **Policy CS2 – The Location and Nature of Development** – The deletion of the requirement to provide suitable infrastructure ‘prior’ to the delivery of IGS is supported.
- 2.3 **Policy CS12 – Affordable Housing** – This Policy requires 35% affordable housing for developments at IGS. This is not considered to be robust or “justified” (a key test of soundness) due to a lack of supporting viability evidence and in light of the fact that 15% is sought for developments located elsewhere in the Borough. IBC has instructed Consultants to prepare an IDP for IGS, and are therefore aware that the IDP Stage 2 Viability Assessment indicates that the 35% affordable housing requirement cannot viably be provided. Current discussions have centred on the provision of circa 15% affordable housing at Henley Gate, however the final percentage will be agreed following further IDP discussions and/or site specific viability assessments.
- 2.4 In addition, there is no reference to “Starter Homes” within this Policy. The Housing and Planning Act 2016 received Royal Assent on 12 May 2016, and sets out a statutory duty for LPAs to require the development of Starter Homes. It is understood that the Government intends to amend the definition of Affordable Housing, as defined in Annex B of the NPPF to include “Starter Homes”. Whilst it is recognised that the secondary legislation has not yet been published, IBC should include reference to “Starter Homes” within Policy CS12, in order to be “consistent” with National policy. This will also ensure that viability issues are not exacerbated further within the District i.e. that “Starter Homes” will form part of the affordable housing requirement, and not in addition to.

- 2.5 **Policy DM1 – Sustainable Design and Construction** – The removal of reference to the Code for Sustainable Homes is supported and reflects the withdrawal of the Code by Government.
- 2.6 Part a. of this Policy requires new build residential development to achieve reductions on CO2 emissions of 19% below the Target Emissions Rate of the 2013 Building Regulations (Part L). The Written Ministerial Statement - March 2015 states that from the date the Deregulation Bill 2015 is given Royal Assent (now enacted), LPAs should not set any additional local technical standards relating to the construction of new dwellings in emerging Local Plans, Neighbourhood Plans or SPDs. Energy performance standards that exceed the energy requirements of Building Regulations cannot be required following commencement of amendments to the Planning and Energy Act (2008), and this was expected to happen alongside the introduction of Zero Carbon Homes in 2016.
- 2.7 Part a. of this Policy is not therefore “consistent” with National policy and should be deleted.
- 2.8 **Policy DM2 - Decentralised Renewable or Low Carbon Energy** – This Policy requires all new build developments of 10 or more dwellings or in excess of 1,000 sq. m of other residential or non-residential floorspace, to provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. However, there is no robust evidence base to justify this requirement and without this, Policy DM2 is “unsound”.
- 2.9 However, the flexibility provided within this Policy is supported. This allows for a reduced provision and/or equivalent carbon reduction in the form of additional energy efficiency measures if it can be clearly demonstrated that 15% is either feasible or viable.
- 2.10 **Policy DM24 – Affordable Housing** - The removal of reference to the Code for Sustainable Homes is supported and reflects the withdrawal of the Code by Government.
- 2.11 Part d. of this Policy requires parking for affordable housing to be provided at the same ratio as for the development as a whole. However, evidence suggests that car ownership among affordable housing occupants is lower than market housing, and therefore this requirement is unnecessary. No evidence to justify this requirement has been provided and without this, Part d. of this Policy is “unsound”.
- 2.12 **Policy DM30: The Density of Residential Development** – This Policy states that IBC will encourage developers to meet Nationally Described Space Standards as set out in the *Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015)*. These regulations are optional and the Planning Practice Guidance (PPG)

(ID: 56-002-20150327) requires LPAs to gather evidence to determine whether there is a need for additional standards and the viability implications of introducing these standards. In addition, the introduction of such standards may work to exacerbate the acute unmet housing need within the Borough.

- 2.13 The Council has not demonstrated there is a need or provided any evidence regarding viability. This Policy is not therefore “justified” or “consistent” with National policy and is “unsound”.