

Ipswich Borough Council Local Plan

Housing Supply Position Statement

February 2016



IPSWICH
BOROUGH COUNCIL

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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 Framework¹ (NPPF) as set out below:

- identify and update annually a supply of specific deliverable² 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, developable³ 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 Report⁴ (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 plan⁵ and Pre-Submission Main Modifications⁶ 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

¹ CLG, 2012, *National Planning Policy Framework*, Core Document Library (CDL) reference NCD18

² 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.

³ 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.

⁴ Ipswich Borough Council, December 2015, *Authority Monitoring Report 2014/15*, CDL reference ICD03a

⁵ Ipswich Borough Council, November 2014, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD*, CDL reference SUCD03

⁶ 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 Guidance⁷ (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 Review⁸ 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.

⁷ CLG, March 2014 and ongoing, *Planning Practice Guidance*, CDL reference NCD19

⁸ 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

<i>Years 1-5 (2016/17 – 2020/21)</i>	
Annual requirement in Core Strategy Review 2011 - 2031	677
Requirement April 2011 – March 2015 (677 x 4)	2,708
Completions April 2011 – March 2015 ⁹	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 ¹⁰) = Shortfall to be added to five year supply	635
Local Plan requirement April 2016 – March 2021 plus 5% buffer ¹¹	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
<i>Years 6-10 (2021/22 – 2030/31)</i>	
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

⁹ 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.

¹⁰ 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.

¹¹ 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.

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	900	

Total												9,993	2,556	403	478	427	513	510	628	829	755	700	602	574	528	513	467	467	469	8,863
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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

