

Sent by email to: planningpolicy@ipswich.gov.uk

30/10/2017

Dear Sir/ Madam

Response by the House Builders Federation to the consultation on the Issues and Options for the Ipswich Local Plan Review.

Thank you for consulting the Home Builders Federation (HBF) on this issues and options consultation. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Please note that as part 1 is shared with Suffolk District Council we have submitted the same comments to both Councils.

Part 1: Strategic cross boundary issues for Ipswich Borough and Suffolk Coastal District

We welcome the collaborative approach that has been taken by Ipswich Borough Council (IBC) and Suffolk Coastal District Council SCDC in taking forward the reviews of their local plans. Given the constrained boundary faced by Ipswich and the level of housing needs across the Ipswich HMA it is important that all the authorities in this HMA continue to work together to ensure housing needs are met. It will be important that both Councils continue to work closely with the other authorities in the HMA. We recognise the Babergh and Mid Suffolk are preparing a joint Local Plan and it will be important that there is a high degree of commonality between these Plans. Consistency between plans within an HMA reduces the complexity for all applicants operating within the area and should be a key aim for the four authorities.

However, whilst we are pleased to see this level of collaboration we are concerned that the level of housing needs arrived at through the Strategic Housing Market Assessment

(SHMA) and set out in the consultation document is not sufficient. In particular we consider that the SHMA should have taken more account of market signals. The issue of market signals has had a significant amount of debate at local plan examinations across the Country with varying outcomes. One of the most recent examples of this was at the Examination in Public of the Canterbury Local Plan. Canterbury has similar market signals to the Ipswich HMA, for example a lower quartile housing to earnings ratio of just over 10, and the Inspector considered a 20% uplift to be appropriate in these circumstances.

However, the recent consultation document “Planning for the right homes in the right places” now provides a clearer direction as to how the Government considers market signals should be taken into account and, most importantly, the level of uplift that should be applied. For the Ipswich HMA it would suggest that insufficient weight have been given to market signals and the proposed uplifts should be increased in those areas where affordability is worst. Whilst this is still a consultation document, and only limited weight can be given to its contents at present, it does signal that the authorities in the Ipswich HMA should consider higher uplifts in relation to market signals.

The eventual level of housing need to be considered by the authorities in the HMA will also dictate the development strategy adopted. We would suggest that as a minimum the Councils look to prepare strategies on the basis of ‘Scenario B’. This level of need would be more in line with the Government’s expectations with regard to boosting housing supply. This is a positive approach towards housing delivery and economic growth and one that could be supported by the HBF. However, we would also encourage the Councils to consider ‘Scenario C’. In taking forward such an approach, with large scale strategic allocations, the Councils will need to be clear as to the timescales that would be required to deliver this level of growth. The large sites that the Councils suggest would be unlocked by new infrastructure are likely to take a considerable time to come forward and this should be factored in when considering delivery timescales. Therefore if ‘Scenario C’ is taken forward the Council will need to consider how it can support smaller sites that will be delivered within shorter timescales and ensure a strong supply of housing supply in the first ten years of the Local Plan.

With regard to where new development should go we would suggest that the Councils do not look at just one option but at a combination of those options put forward. It is likely that some of IBC’s housing needs will have to be delivered outside of the Borough. The City is constrained by its tightly drawn boundary and whilst some higher

density development and changes of use must be considered, there will be a need for some of Ipswich's needs to be accommodated elsewhere. As such it is essential that IBC are clear as to how many homes will be provided elsewhere and ensure that the other authorities in the HMA allocate sufficient sites to meet those unmet needs.

It is therefore likely that the options being considered by SCDC will need to take account of the need to meet some of Ipswich's unmet needs. Whilst meeting some of these needs near to Ipswich is a consideration the Council should not restrict itself to such an approach. The housing needs of an HMA can be met anywhere within that HMA and increasing housing delivery at other towns and villages should be considered. There are clearly options for delivering increased growth across the District on the basis of the options set out in figure 4. SCDC might want to consider an approach that draws on aspects of each option that will support the necessary growth to meet the needs of the area.

Given the fact that needs are likely to be met across both Councils it is essential that it is clearly indicated in the plan how needs are being met and that there are shared policies, contingency measures and monitoring to facilitate this joint working. Whilst this can be set out within the relevant plans the Councils may want to consider preparing a joint local plan or a shared strategic framework similar to the that has been undertaken in the North Essex¹ HMA.

Part 2: Development Management Policies

Housing mix, affordability and density

In establishing the appropriate mix of housing type and level of affordable housing provision it is essential that viability is a primary concern alongside the assessment of housing needs. As such we are concerned that the Council have asked in question 44: "*What do you consider to be an appropriate mix of affordable and private market housing **if viability where not a concern***". It is impossible to consider one without the other and the Council can only make a decision on the basis of the evidence it collects to support the preparation of the Local Plan.

¹ North Essex HMA comprises of Braintree, Tendring and Colchester

In developing policies on housing mix, affordability and density the Council must ensure that their policy provide the necessary certainty as to their expectations whilst also providing a degree of flexibility. When testing a plan's viability it is not possible to test all development scenarios, as such it is important to ensure that there is flexibility within the policy to recognise that some development will be made unviable by the policies in the Local Plan. Flexibility within the local plan is essential and something that is recognised through the NPPF. In particular paragraph 14 of the NPPF outlines the need for plans to be flexible in order to adapt to rapid change when meeting objectively assessed needs.

I trust you will find these comments helpful and if you would like to discuss any aspect of our representation or the work of the HBF please feel free to contact me.

Yours faithfully

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