

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

01/03/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Ipswich Local Plan Review

1. Thank you for consulting the Home Builders Federation (HBF) on the final draft of the local plan review. 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.

Cross boundary strategic policies

2. It would appear from the Council's evidence that they have co-operated effectively with neighbouring authorities to plan for housing needs across the Ipswich Strategic Planning Area (ISPA). Growth expectations are set out clearly in Policy ISPA1 and we would agree that based on the standard method the minimum number of homes to be delivered in the areas is circa 35,000 between 2018 and 2036. However, we cannot comment on whether this has translated into effective joint working regarding the cross-border infrastructure and sites issues set out in ISPA2 and ISPA3. It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.

Policy CS1: Sustainable development.

The policy is unsound as it not consistent with national policy

3. When the presumption in favour of sustainable development was first introduced the Planning Inspectorate (PINS) recommended that a policy reflecting this approach should be included in all local plans. This approach is no longer considered necessary by PINS and they have rescinded their original advice on this matter. Given this position and the fact that paragraph 16(f) of the National Planning Policy Framework (NPPF) states that policies in local plans should serve



a clear purpose and avoid any unnecessary duplication we would suggest this policy is deleted.

Policy CS7: The amount of housing required

The policy is not sound the housing requirement and stepped trajectory has not been justified

Housing requirement

4. Paragraph 55 of the 2019 NPPF states that the Council should establish a housing requirement figure for their whole area. The starting point for establishing this requirement is the local housing needs assessment calculated using the standard methodology. Using this methodology, we would agree with the Council that the minimum number of homes required to be provided for by the Council is 8,010 units between 2018 and 2036. However, it is also important to note that this is the minimum number of homes that should be provided. National policy and guidance recognise that there may be circumstances where the local planning authority may want to plan for the delivery of more homes than the local housing needs assessment. These circumstances are set out in paragraph 2a-010 and 2a-024 of PPG.
5. Firstly, 2a-010 of PPG outlines that Councils may need to plan for a higher housing to deliver growth strategies, where strategic infrastructure projects are likely to drive an increase in homes locally or there is an agreement to take unmet needs from a neighbouring authority. It is evident from the local plan that Ipswich are seeking to support economic growth with a drive to support at least 9,500 additional jobs and infrastructure improvements to facilitate that growth. However, we are concerned that this desire for growth is not being matched by the Council's decision to adopt a housing requirement that is below previous assessment of need with regard to economic growth. It is noted that the 2017 SHMA estimated that to meet expected jobs growth in Borough would require 11,220 homes to be provided between 2014 and 2036. This equates to 510 dwellings per annum (dpa) during the plan period significantly higher than the 445 dpa being planned for through the draft Local Plan.
6. The Council consider the issues of such uplifts in their Housing Topic Paper but reaches the conclusion at paragraph 26 that housing supply in general will increase within the IPSA as other authorities will be required to deliver more homes using the standard method. The implicit suggestion would appear to be that any additional growth required to support the economic growth of Ipswich will be covered by additional delivery elsewhere. However, there does not appear to be any assessment as to whether this will be sufficient and provided in appropriate locations to support the economic and jobs growth aspirations of Ipswich. Whilst we recognise that Ipswich's tight boundary constrains the Council's ability to promote significant levels of additional growth in its own area, the need to support its economic aspirations close to where new jobs will be created should have been

considered with a view to seeking the delivery of additional homes elsewhere in the ISPA.

7. Secondly, paragraph 2a-024 of the PPG states that an increase in the total housing figures may be considered where it could help deliver affordable housing. The Council recognise in paragraph 8.151 affordable housing need is 239 dpa, around 48% of their requirement and as such they will not meet all of their need for affordable housing. Consideration should have been given with the other authorities in the ISPA whether more sites could be allocated elsewhere in the ISPA to meet the affordable housing needs of Ipswich.

Stepped requirement

8. Part c of CS7 includes the Councils proposed stepped requirement of 300dpa for 2018-24 and 518dpa for the remaining period of the plan. Whilst we agree that the proposed requirement for the plan period represents the minimum number of homes to be planned for, we are concerned about the approach taken to the stepped requirement. Whilst the latest PPG makes provision for the adoption of such steps, their use and the way it is applied must be justified. In too many cases the step is required on the basis of the strategy chosen by the Council not on the basis that there were no other options available to the Council to ensure a more consistent delivery across the plan period. We recognise that Ipswich is a tightly constrained area and as such has more limited opportunities to meet needs. In this regard we would not disagree with the Council's justification to include a stepped trajectory.
9. However, we do not agree with the steps proposed. The aim would appear to be to set a modest target in order to provide the Council with a substantial buffer over the first years of the plan. This approach is not sufficiently challenging and is more likely to lead to the whole plan under delivering. We would suggest that the requirement closely follows the delivery expectations of the Council in order to provide the necessary incentive to maintain supply and press forward with the approval of planning applications and the delivery of development. We would therefore suggest the following two stage stepped requirement:
 - 2018/19 to 2019/20 – 300
 - 2020/21 to 2023/24 – 375
 - 2024/25 to 2035/36 – 493
10. This would ensure the Council can maintain a five-year land supply on adoption whilst also ensuring a challenging requirement ensure the Council provides timely support for development across Ipswich.

Housing supply

11. We welcome the Council's decision to include a 10% contingency within its housing supply to ensure that housing needs are met in full. This contingency would appear to be supported within the Council's housing supply estimates with identified supply being 17% above the Council's housing requirement.

12. On the basis of the Council's stepped requirement and the supply trajectory as set out in the Housing Topic Paper the Council would appear to have a five-year housing land supply on adoption of the local plan. However, it is not evident as to which sites, either extant permissions or local plan allocations, form the basis of supply within the first five years of the plan as neither the SHLAA nor the Topic paper provide the necessary detail. The most up to date evidence we can find providing a detailed assessment of supply is on table 18 of the latest annual monitoring report. However, this table is not consistent with the chart provided at paragraph 28 of the Housing Topic Paper. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period to ensure the inspector and those commenting on the plan have a good understanding of the delivery expectations. This is particularly important with regard to the five-year housing land supply given the amended definition of deliverable within the 2019 NPPF which outlines that if major development is to be considered deliverable within five years it must:
- Be allocated for development, has a grant of permission, or is identified on a brownfield register; and
 - There is clear evidence that housing completions will begin on site within five years.
13. Until such evidence is provided, we cannot comment as to whether the Council's position is robust and as such, we reserve the right to comment on this issue as part of the examination of the local plan.

Recommendations on CS7

14. In order to make the plan sound the Council will need to:
- Justify why they have not considered a higher housing requirement that better meets their jobs growth assessments and affordable housing needs. Whilst we recognise that Ipswich is constrained the Council should have looked to secure additional provision within neighbouring areas;
 - Set a more challenging stepped trajectory that is more closely linked to expected supply; and
 - Provide evidence as to the delivery rates for the specific allocations and other sources of housing supply within the local plan to ensure these can be scrutinised effectively.

CS12 Affordable housing

The policy unsound as it is not consistent with national policy

15. Policy CS12 states that affordable housing provision outside the Ipswich Garden Suburb and Humber Doucy Lane should be at least 15%. The requirement should be set at 15% and not be considered to be the lower end of a potentially higher requirement. Policies, as set out in paragraph 16 of the NPPF need to provide clarity as to the expectations of the Council. Phrases such as "at least" do not

provide the necessary clarity for either applicants and decision makers that is expected by paragraph 16 of the NPPF and should be removed from this policy.

16. The revised NPPF has changed matters significantly with the role for viability now being primarily at plan making stage. This is set out in paragraphs 34 and 57 of the NPPF with supporting guidance in paragraphs 10-001 to 10-019 of the PPG. Given the Government's position that decision makers can assume that policy compliant development is viable it is important that local policies take account of situations where development is more marginal.
17. We are therefore concerned that the viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. The Viability assessment includes such costs on all sites of £175,000 per net developable acre (roughly £430,000 per net developable hectare). However, work undertaken by the HBF for the viability assessment of the Durham Local Plan indicated that this averaged, on the four PDL sites tested, £711,000 per net developable hectare. We recognise that this evidence is not directly relatable to development in Ipswich but it does provide an indication as to the potentially very tight margins on development in the Borough. Given the Viability Assessment shows that development of brownfield land is marginal the Council may need to consider a lower requirement on such sites, or amending other policy requirements in the plan, if it wants to maximise the delivery of such sites.

DM7: Provision of private outdoor amenity space in new and existing developments

The policy is unsound as it not consistent with national policy or justified

18. This policy is too prescriptive as to the levels of open space that are required for homes within Ipswich. Whilst we recognise the importance of outdoor space it should be for the developer to decide the level of provision within each site. Housebuilders understand the market and the amount of open space that people expect and as such this policy needs to be rewritten to provide a greater degree of flexibility. It is also the case that Ipswich is a highly constrained authority and if the Council is seeking to set standards for open space within developments and meet its housing requirements it will need to offer flexibility within other policies such as the provision private outdoor amenity space. We would suggest the following wording:

“To ensure that new residential developments deliver a high quality and environmentally sustainable living environment, developments for houses and ground floor maisonettes will be required to incorporate well-designed and located private outdoor amenity space of an appropriate type and amount. When considering the provision of outdoor amenity space applicants should have regard to the need to meet other density and urban design requirements of the plan.”

All private gardens and other outdoor amenity spaces should be safely accessible to occupants, designed to take advantage of sunlight and daylight and provide a functional space having regard to the mix of housing/types to be provided.”

DM21: Transport and Access in new developments

Part c is unsound as it has not been justified.

Part c - electric vehicle charging points

19. The HBF prefers a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. If the Council does choose to make policy in this area there are several issues that it will need to consider carefully.
20. We note that the consultation includes a requirement to include electric vehicle charging points on all new developments. Firstly, the policy lacks clarity as it does not state the amount of charging points that should be provided. The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives.
21. The Council's work should be supported by evidence demonstrating the technical feasibility and financial viability of these requirements. The Council must justify any requirement by including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary increasing the cost of provision. There may also be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking.

Recommendation

22. Without the necessary justification and clarity, we would suggest that part c is deleted.

DM22 - Car and Cycle Parking in New Development

This policy is unsound as it is inconsistent with national policy

23. The policy states that they will require adopted standards for car and cycle parking to be complied with. However, it must be noted that these standards are not set out in the local plan but in supplementary guidance. We are concerned that such standards, which are issues of policy as they can be used to refuse an application if they are not met, being set out in guidance and not the plan itself. Legislation is clear that policy issues must be set out in local plans. This is to ensure that should these standards change then appropriate consultation and public scrutiny of these changes is undertaken.

Recommendation

24. Two options are open to the Council, they can either include the standards as an appendix in the local plan or state in policy that development will need to have regard to the standards.

Conclusions

25. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:
- Policy CS1 repeats national policy and is therefore inconsistent with paragraph 16 of the NPPF;
 - The housing requirement seeks to meet minimum needs however we are concerned that this may not address the jobs growth expected in Ipswich and will not address affordable housing needs;
 - The proposed steps within the stepped requirements are not justified and should better reflect delivery expectations;
 - We could find no evidence on the delivery trajectories for specific allocations and other sources of supply have been provided in the evidence base;
 - The viability evidence indicates that the majority of brownfield development at the proposed affordable housing rates would be marginal at best;
 - The private outdoor space requirements are insufficiently flexible;
 - The policy on electric vehicle charge points lack clarity and is not justified;
 - That parking requirements must be included in the plan or, if not, the policy should be amended so that development only has to have regard to these standards.
26. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616