

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

13/03/2019

Dear Sir/ Madam

Response by the Home Builders Federation to the Ipswich Local Plan Preferred Options consultation

Thank you for consulting the Home Builders Federation (HBF) on the preferred options for the Ipswich Local Plan. 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.

It is important that local planning authorities maintain up to date local plans and it will be important for Ipswich Borough Council to progress quickly to submission and adoption of a new local plan that meets housing needs in full. We would welcome the opportunity to discuss the Council's progress with the plan and the approach taken with regard to improving the supply of land for housing development. Outlined below are some general comments with regard to the preparation of the plan and the key aspects we consider are necessary to ensure it can be found sound.

Presumption in favour of sustainable development – CS1

When the NPPF was first published Councils were advised by the Planning Inspectorate to include some 'model' wording in local plans with regard to the presumption in favour of sustainable development. However, it is our understanding that this advice has since been rescinded and that such statements are no longer a requirement of local plans. Given this position and the fact that S1 repeats national policy it should be deleted.

Housing needs and supply - CS7

We would agree with the Council's assessment of housing need of 479 dwellings per annum. However, this is the starting point for assessing needs and national policy and guidance expect Councils to consider whether other factors will necessitate a higher requirement to support delivery in other areas or to improve delivery of affordable housing. Given that the level of affordable housing needs within Ipswich that will not be met the Council need to consider whether additional sites could be allocated that



would make a further contribution to meeting these needs. It will also be important to raise this with neighbouring authorities to consider whether it is possible to allocate additional sites within the vicinity of Ipswich to increase the provision of affordable housing.

The Council consider it necessary to adopt a stepped housing trajectory as the Council are currently unable to demonstrate that they have a five-year housing land supply. The HBF recognises that there may be circumstances where a Council needs to adopt a stepped trajectory. However, the lack of a five-year housing land supply on adoption of the plan cannot be considered to be a relevant justification. Paragraph 3-034 of PPG indicates that there are two circumstances where a stepped trajectory may be appropriate – where there is a significant change in a housing requirement or where strategic sites will deliver later in the plan period. Whilst it would appear that the Council can satisfy one of these tests in that strategic sites in the plan will not deliver until later in the plan period, we would suggest that the step as set out in this policy does not reflect expected delivery. We would recommend that whilst a requirement in the first two years of 350 dpa is acceptable this should increase to 400 homes between 2020/21 and 2022/23. At 2023/24 this should then increase to 550. This is more in line with the delivery trajectory expected by the Council and will ensure that the Council remains focussed on delivering the necessary sites to meet housing needs.

Housing type and tenure – CS8

Housing mix

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is effective and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. Paragraph 11 of the NPPF recognises this need for flexibility stating that plans should be “*sufficiently flexible to adapt to rapid change*”. Policies identifying a precise mix do not offer that flexibility and as such cannot be considered sound.

It is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. So, whilst we support Council’s in seeking to achieve a broad mix across the plan period this should not be translated directly into policy. It should be left for developers to supply the homes they consider are necessary to meet demand. The development industry understands what types of homes are needed to meet the demands of its customers, if it did not then the homes would not sell.

We would therefore suggest that the policy requires applications for housing development to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and developer on a site by site basis. This would establish a flexible approach to housing mix which: recognises that needs and

demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Self-build and custom house building

Whilst the Council have based this policy on the evidence within the self-build register it is important that the Council revisit this evidence to test whether those individuals currently on the list are still interested in a plot on which to build their own home. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the register fall from 155 to just 3. We would suggest that Ipswich undertake a similar exercise to assess whether those who are on the register are in reality still interested in self-building within Ipswich.

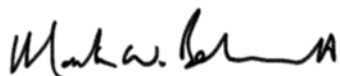
Our concern is that Council's across the country are over-estimating the number of households wanting to build their own homes and that this will leave plots vacant. For this reason, we would consider the most acceptable and policy compliant approach would be for the Council to use their own land or liaise with landowners, as set out in PPG, in order to identify sites that would be suitable to provide self-builders. If the Council still, consider it necessary to require the provision of such plots on residential applications we would suggest a much lower requirement is adopted reflecting the uncertainty of the demand identified on the self-build register it is important there is a mechanism in the policy to ensure that where such plots are not sold, they revert to the developer.

Outdoor amenity space - DM7

We could not find any evidence to support the level of private outdoor space being proposed in this policy. The size of any private outdoor space should be left to the discretion of the developer who are aware of the demands of their customers. The approach taken by the Council could potentially reduce the amount of land available for housing in what is a very constrained borough. Therefore, we would suggest that whilst we accept that some private outdoor amenity space will be required the Council should not set out minimum specifications for such space.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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