

Felicia Blake

From: Mamun Madaser ·
Sent: 27 February 2020 14:07
To: PlanningPolicy
Subject: Local Plan Ipswich consultation response
Attachments: Ipswich Local Plan Consultation Reseponse DRAFT.doc

Follow Up Flag: Follow up
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Hi there,
Please find Habinteg's response to Ipswich's recent Local Plan consultation.
If you could please confirm receipt of the document that would be very helpful.
Kind regards,
Mamun
Mamun Madaser
Parliamentary & Research Officer



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Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

**Town & Country Planning (Local Planning) (England) Regulations
2012 (Regulations 19)**

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk

Planning Policy Team
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE.

website:
www.ipswich.gov.uk

Consultation document(s) to which this comments form relates:	
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2nd March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	
First name	Mamun	
Last name	Madaser	
Job title (<i>where relevant</i>)	Parliamentary & Research Officer	
Organisation (<i>where relevant</i>)	Habinteg Housing Association	
Address (<i>Please include post code</i>)	Holyer House 20-21 Red Lion Court London EC4A 3EB	
E-mail		
Telephone No.	0207 822 8706	

PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<p>Ipswich Local Plan Final Draft – Policy DM12: Design and Character</p>	<p>Habinteg has 50 years’ experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Ipswich.</p> <p>Habinteg strongly supports the approach to Part M4(2) accessible and adaptable homes. It’s great to see Policy DM12 ask for “25% of new dwellings will be required to be built to Building Regulations Standard M4(2).” The policy ask is significant in helping to ensure that a proportion of new homes will be accessible.</p> <p>According to the English housing survey only 7% of English homes have the accessibility features to classify them as ‘visitable’. Habinteg believe that all new homes should be built to Part M4(2) accessible and adaptable to help meet the national accessible homes deficit. A Habinteg research report (A forecast for accessible homes) published in the summer of 2019 revealed that in England only 22% of new homes due to be built by 2030 will meet accessible and adaptable standards. With this in mind we warmly welcome the prospect of Ipswich Borough Council setting out the requirement for a proportion of homes to have the capability to adapt as residents’ need change.</p> <p>The policy goes on to say that “The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.” We believe the language should be firmer, so that there is a narrower definition given for when the standard may not be applied. A definition which firmly places the burden of proof onto the developer which will help minimise instances where compliance with the policy is argued out during the planning permission process.</p> <p>This emphasises for us that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4(3) wheelchair user dwelling standard. Habinteg’s <i>Forecast for Accessible Homes</i> also found that just 1% of homes outside London are set to be</p>

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	<p>built to wheelchair dwelling standards between 2019 and 2030.</p> <p>We would therefore like to see Ipswich set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans.</p> <p>Habinteg's in house consultancy Centre for Accessible Environments, (CAE) offer bespoke training and consultancy on all aspects of access including housing, public spaces and community facilities. CAE's services may be of benefit to the Central Lancashire planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team have delivered support to several local authorities as well as statutory bodies such as Homes England, helping to upskill staff in the specific characteristics of accessible housing, as well as providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk</p> <p>Please don't hesitate to get in touch with us if we can help in any way with development of the Central Lancashire plan. cmcgill@habinteg.org.uk</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2nd March 2020.

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

- The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.** **Yes**
- Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.** **Yes**
- Adoption of the Ipswich Local Plan Review.** **Yes**

PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.