

## Felicia Blake

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**From:** Tom Cole  
**Sent:** 28 February 2020 16:19  
**To:** PlanningPolicy  
**Cc:** Paul Burley  
**Subject:** Ipswich Local Plan Review Final Draft Consultation - Constable Homes Ltd - Red House Farm  
**Attachments:** 280220 Red House Farm Reps FINAL.PDF  
**Follow Up Flag:** Follow up  
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Dear Sir or Madam,

Please find enclosed representations made on behalf of our client, Constable Homes Ltd, relating to Red House Farm, Tuddenham Road.

The representations are made in response to the Ipswich Local Plan Review Final Draft Consultation.

I would be grateful if you could respond to confirm receipt of this email.

Regards,  
Tom

**THOMAS COLE**  
**SENIOR PLANNER**

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28 February 2020

Sent by email to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Dear Sir or Madam,

## **IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW FINAL DRAFT CONSULTATION RED HOUSE FARM, TUDDENHAM ROAD**

### **Introduction**

We write on behalf of our client, Constable Homes Ltd, to make representations in respect of the Ipswich Local Plan Review Final Draft, consisting of:

- The Core Strategy and Policies Development Plan Document (DPD) Review Final Draft; and
- The Site Allocations and Policies (incorporating IP-One Area action Plan) DPD Review Final Draft.

The final draft Local Plan sets out the Council's policies for growth in the Borough up to 2036.

These representations relate to the promotion of Red House Farm for residential development. Our client has engaged with previous plan-making stages in responding to the Call for Sites and Regulation 18 consultation exercises, and has entered into pre-application discussions with the Council and Highways Authority.

By way of background to these representations, Constable Homes Ltd has an interest in the land referred to as Red House Farm. Constable Homes is an operating subsidiary of the Anderson Group, which is a private development and construction business with an exceptional track-record of delivery across the south-east.<sup>1</sup> As a case in point, Anderson Group is currently nearing completion of 93 new homes off Europa Way in Ipswich Borough ('Jasmine Park'), and this has delivered around 50 completions per annum.<sup>2</sup>

The extent of our client's ownership is defined by the red line shown on Figure 1 below. The site is located to the north of Ipswich and comprises several fields and a 19th Century former farmhouse and outbuildings. The woodland and mature trees on-site are subject of a Tree Preservation Order ('Land between Tuddenham Road and Westerfield Road, No 7 2001'). The parcel of land is currently accessed by vehicles from Tuddenham Road and extends to circa 6.5 hectares in area. It is adjacent to residential dwellings to the south and is bound by agricultural land to the east, west and north.

Westerfield National Rail station is located approximately 500 metres to the north of the site and is served by a regular trains service between Felixstowe and Ipswich.

<sup>1</sup> <https://www.andersongroup.co.uk/>

<sup>2</sup> <https://www.andersongroup.co.uk/project/europa-way/>

**Figure 1: Red House Farm**



Source – Google Maps

The site is identified as part of a Strategic Housing Site in the adopted Local Plan (2017) which is referred to as the Ipswich Garden Suburb.

Under draft Policy CS10 of the emerging Local Plan, the Ipswich Garden Suburb is expected to deliver 3,500 homes across three neighbourhoods referred to as Henley Gate (east of Henley Road and north of the railway line), Fonnereau (west of Westerfield Road and south of the railway line) and Red House (east of Westerfield Road). Red House Farm is located in the Red House neighbourhood.

### **Response to the Draft Plan**

The representations are set out against the draft policies in the Core Strategy and Policies Development Plan Document Review Final Draft dated January 2020. As the site is allocated as a strategic site in the Core Strategy, the draft Site Allocations Document has no policies of relevance and so is not discussed further in these representations.

### **Policy CS7: The Amount of Housing Required**

Draft Policy CS7 sets out the Council's proposed strategic housing policy. It establishes that the Council's minimum housing requirement is at least 8,010 dwellings for the period of 2018 to 2036, which equates to an annual average of 445 dwellings. The housing land supply would comprise a combination of site allocations with a windfall allowance of 50 units per annum between 2022 and 2036, which results in a total of 7,214 units. This is inconsistent with the minimum housing requirement of 8,010 units. We presume that this shortfall of 796

units is as a result of the housing supply period being reduced by a year from the base date of the Plan to 2019-2036 as per Table 4 of the Plan. This should be clarified by the Council.

The Government published the Housing Delivery Test 2019 measurement on 13 February 2020. Ipswich only delivered 611 homes across the previous three years against a target of 1,319 homes across the period. This equates to 46% of the minimum target which means that the Council is a "buffer authority". We note that the 2019 calculation uses 445 homes per annum and so reflects that of draft Policy CS7. In the previous year, the measurement for Ipswich Borough Council was 66%. This indicates that the Council's housing delivery has worsened and that measures need to be taken to recover the position. It is also very close to the 45% threshold in 2019 NPPF paragraph 215b. That threshold will increase to 75% next year which only serves to reinforce the urgency of addressing the significant shortfall in housing delivery. The Council should be proactively identifying opportunities to accelerate delivery to overcome this.

Paragraph 73 of the NPPF is therefore relevant, which states that strategic policies in respect of housing land supply should include a buffer of 20% to the five year housing land supply, where *"there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"*.

This adds to significant challenge of meeting 75% of need by November 2020 as set out in Paragraph 215c of the NPPF. It is assumed that this date is February 2021. No buffer has been applied to Policy CS7. In order for the Plan to be effective, a buffer equivalent to one year's supply (445 dwellings) units should be added to the five year housing land supply.

The NPPF is clear that, as a minimum, plans must seek to meet the area's objectively assessed needs in order to be found sound and so this should be set out within the Plan. The Council is in a critical position of acute under supply and failing to quantify the true need increases the likelihood that the unmet need will not be addressed. It is evident that an immediate review of the Plan will be necessary if the Council is only targeting a capped need figure.

#### Policy CS8: Housing Type and Tenure

Draft Policy CS8 explains the Council's policy approach to housing type and tenure is to plan for a mix of dwelling types to be provided to achieve strong, vibrant and healthy communities. In order to expedite the early delivery of residential development at Red House Farm, our client had considered the suitability of pursuing a scheme with an element of care accommodation as an alternative to a conventional residential scheme of around 100 C3 Class dwellings. In the Council's pre-application advice to our client, it has been suggested by Officers that there is no need for elderly accommodation in the Borough.

This is despite the Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) Part 2 Partial Update (January 2019) explaining that housing need projections indicate that the population aged 65 or over is set to *"increase dramatically in the HMA over the plan period; from 104,985 to 153,578 in 2036, a rise of 46.3%"* (our emphasis). Despite this, the Council has taken the position that the SHMA identified no further need for specialist housing for the elderly and that a retirement living proposal at Red House Farm would not be supported by the Council.

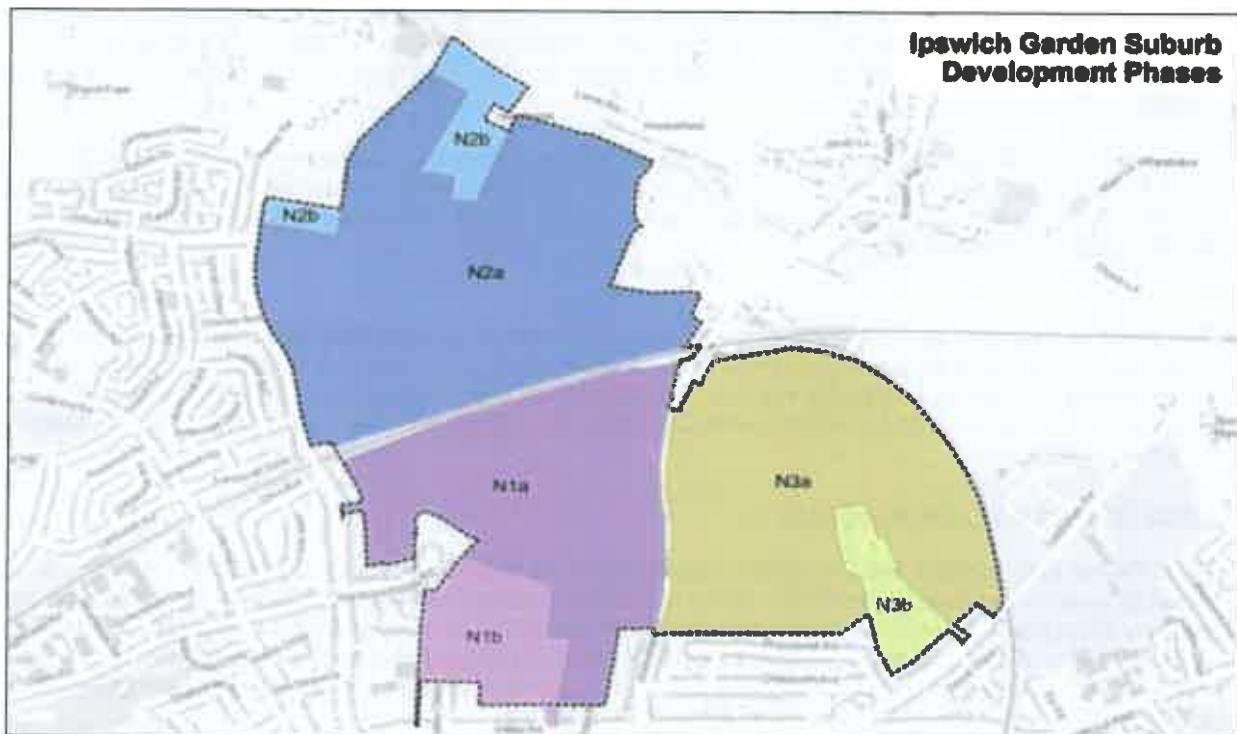
In response, we remind the Council that draft Policy CS8 does not separate elderly provision from other forms of housing and so it would effectively contribute to the Council's five year housing land supply. It is therefore somewhat surprising that the Council is not actively encouraging this form of development in the context of pressing overall needs. It is also relevant to note that a retirement village scheme is plainly a different form of housing provision to sheltered housing and so identifying a surplus of sheltered housing in the SHMA does not mean that there is no need for development to cater for the elderly. As such, the Council's position on this matter is not supported. Policy CS8 should be expanded to acknowledge that retirement living proposals are supported in order for the Plan to be effective. We also note the additional trickle-down benefits that would be achieved through down-sizing which will release family housing in established areas, which some buyers may prefer to new-build development and this would contribute to the diversity of housing supply. Our client will

continue to engage proactively with the council to agree an appropriate form and type of residential scheme on this discrete area of the Garden Suburb.

**Policy CS10: Ipswich Garden Suburb**

Draft Policy CS10 outlines that the spatial strategy regarding the scale and location of housing growth is to deliver 3,500 homes within the Garden Suburb. This is consistent with the adopted policy position. Our client's land is identified as part of the Garden Suburb allocation (area N3(b)) (Figure 2 below). This has been carried through from the Regulation 18 consultation and is supported by our client, reflecting that the site is inherently sustainable, suitable and available for residential-related development.

**Figure 2: Ipswich Garden Suburb Development Phases Plan**



Source – Ipswich Borough Council

We welcome that the Council is considering how the wider site might come forward for development, however we reiterate our concerns made at Regulation 18 stage that the Council continues to number the phases in a way that implies they should be delivered in numerical order; the phases are labelled N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b). As explained above, Red House Farm incorporates a former farmhouse and outbuildings, and there are mature trees that line the boundaries of the plot. We note that the Indicative masterplan shown by the Ipswich Garden Suburb SPD (2017) prioritises these features being retained and therefore, provided that the ability to connect other parcels is not prejudiced, development of this site can come forward in a self-contained manner.

As explained to the Council during pre-application discussions, our client has devised a way for Red House Farm to come forward for development at the earliest opportunity, in a manner that is independent of the wider masterplan but that does not conflict with the SPD. Development could be achieved by retaining existing buildings on site and existing trees around its periphery that would robustly screen a future proposal.

Our client's highways advisor, Caneparo Associates, has designed an effective and safe access arrangement in which the existing access from Tuddenham Road can be utilised to serve the development without severe

Impacts as per Paragraph 109 of the NPPF. This can be achieved by restricting access to residents only at this time, and then for general use, public transport and cycles in the future once the remaining road infrastructure is in place within the Red House Neighbourhood as per the Garden Suburb SPD (2017) requirements.

To that end, we are surprised that when the Council interprets its own policy that this development would be precluded rather than positively facilitated. It cannot be the intention of the planning system to delay much-needed development, particularly when the Government is clear that LPAs should act positively to enable development to be brought forward. The Council clarify its approach in order that the Plan is not ambiguous and therefore effective. As advocated by the NPPF, planning policies should be sufficiently flexible to ensure that they do not act as a burden to the delivery of development. This identifies a fundamental issue with the policy and the Council must reconsider how it proposes to operate the draft allocation in light of this.

We therefore suggest that the policy wording be amended to outline how each parcel could come forward individually, whilst still being in general accordance with the Council's growth strategy and the requirement for balanced growth across the strategic allocation. This could facilitate the timely delivery of residential accommodation, as recognised at paragraph 68(d) of the NPPF, especially in the context of the Council's housing supply position which is fast deteriorating.

#### **Concluding Remarks**

Our client welcomes and supports that the draft Plan to identify the site for development through its continued allocation within the Ipswich Garden Suburb. This reflects that the site represents a suitable, available and deliverable site, and offers a realistic prospect for the delivery of a significant quantum of C-class housing development within the emerging Plan period. This must be realised in a fashion that looks to facilitate the timely development of the site and not act as an impediment to this and we request that the Council reconsiders its current approach to ensure that its Local Plan will be effective.

Constable Homes Ltd is eager to continue to positively engage with the Council through Plan-making and will continue its pre-application discussion with the authority to refine the proposals at Red House Farm. We request that we are kept informed of any policy updates going forward. We would like to have the right to participate at any oral examination if necessary.

If you have any queries regarding this submission, or would like to discuss the proposals further, please do contact Paul Burley or Tom Cole at this office.

Yours sincerely,



**Montagu Evans LLP**

