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

Date: 2 March 2020

Our Ref: JR M15/0715-321

By email only:
PlanningPolicy@ipswich.gov.uk

Dear Sir/Madam

RE: IPSWICH LOCAL PLAN REVIEW: REGULATION 19 FINAL DRAFT

Thank you for the opportunity to comment on the Regulation 19 Final Draft of the Ipswich Local Plan. We represent Rentplus UK Ltd, an innovative company providing **affordable rent-to-buy housing** for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019.

Rentplus has previously commented on the Local Plan at the Regulation 18 Preferred Options stage. Our previous representations set out the Rentplus model of affordable rent to buy in full. However, by way of summary, Rentplus is an **affordable Rent to Buy** product which can be delivered without requiring any public subsidy. Households rent the property from Rentplus' partner Registered Providers (RP) for a defined period of five, ten, fifteen or twenty years. During this time, households will benefit from security of tenure; management and maintenance from the partner RP; the ability to establish a good credit history (to assist with mortgage applications); and the opportunity to raise their own savings. At the end of the period of rent, households will have the option to purchase; Rentplus is unique in that they receive a gifted deposit equivalent to 10% of the market value of the property at that time.

Comments on the Regulation 19 consultation

Firstly, as a general observation, we are pleased to see that the Council has produced a 'Tracked Change' version of the Local Plan; this is very useful to participants in the consultation.

We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.

We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: "*In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals...*"

It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is effective, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:

"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."

Summary

We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in Ipswich Borough, please get in touch. We would like to be notified of further consultations; please notify Tetlow King Planning as agents of Rentplus by email only to consultation@tetlow-king.co.uk.

Yours faithfully

JAMIE ROBERTS MPlan MRTPI
PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING

consultation@tetlow-king.co.uk

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



**IPSWICH
BOROUGH COUNCIL**

e-mail:
planningpolicy@ipswich.gov.uk

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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: | Local Plan Review |
| Please return this comments form to: | <u>planningpolicy@ipswich.gov.uk</u> 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 | - | Jamie |
| Last name | - | Roberts |
| Job title (<i>where relevant</i>) | - | Principal Planner |
| Organisation (<i>where relevant</i>) | Rentplus UK Ltd | Tetlow King Planning |
| Address (<i>Please include post code</i>) | c/o Agent | Unit 2, Eclipse Office Park High Street Staple Hill BRISTOL BS16 5EL |
| E-mail | - | |
| Telephone No. | - | |

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

| | |
|--|---|
| Your name or organisation (and client if you are an agent): | Tetlow King Planning on behalf of Rentplus UK Ltd |
|--|---|

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.) |
|---------------------------------------|---|
| Policies CS8 and CS12 | We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard. |
| Policy CS8 | We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: <i>"In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals..."</i> |
| Paragraph 8.153 | <p>It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is <u>effective</u>, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:</p> <p><i>"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."</i></p> |

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. | ✓ |
| Publication of the Planning Inspector's Report on the Ipswich Local Plan Review. | ✓ |
| Adoption of the Ipswich Local Plan Review. | ✓ |

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.