

Felicia Blake

From: Melville-Claxton, James
Sent: 02 March 2020 11:45
To: PlanningPolicy
Subject: FW: Permission Homes Suffolk Ipswich Borough Council Final Draft Local Plan representation
Attachments: Persimmon Homes Suffolk representation.pdf

Please find attached a PDF version of the Persimmon Homes representation on the IBC Final Draft Local Plan

Kind regards

James Melville-Claxton

Planner

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From: Melville-Claxton, James
Sent: 02 March 2020 11:43
To: 'PlanningPolicy@ipswich.gov.uk' <PlanningPolicy@ipswich.gov.uk>
Subject: Permission Homes Suffolk Ipswich Borough Council Final Draft Local Plan representation

Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15th January and 2nd March 2020. Representations at this stage should only be made in relation to the legal compliance and soundness of the Final draft of the Local Plan, and using appropriate tests for soundness which a Local Plan must satisfy, it is considered that the Final Draft Plan is not Positively Prepared, Justified, or Effective for the reasons set out below.

Tests of Soundness

The tests for soundness are set out in the 2019 revised National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

CS1 – Presumption In favour of Sustainable Development.

The Revised NPPF confirms that the presumption in favour of sustainable development does not trump the statutory presumption in favour of the development plan set out in s38(6) of the Planning and Compulsory Purchase Act 2004. The wording of which is detailed at paragraph 2.2 of the final draft of the Core strategy and policies development plan. As such the inclusion of the model wording in Local Plans is no longer required. It is reasonable to consider that policy CS1 is not consistent with the National Policy and should be removed, in addition no robust justification for its continued inclusion in the document has been provided.

Duty to Cooperate.

IBC completion delivery rates have been historically poor, and the Orwell Peninsula between Felixstowe and Ipswich provides a significant opportunity for growth. Through publication of the Government's "Planning for the right homes in the right places" the CLG standard methodology establishes that calculated figures for Ipswich's OAN have risen, in addition to OAN figures for adjoining authorities. In addition it is recognised within the Core Strategy that over the last two years house sales have fallen in Ipswich. As per the NPPF there is functional need for IBC, East Suffolk, and Babergh and Mid Suffolk to ensure development needs are met. However, there seems to be little recognition of the potential of this area, or detail provided on how East Suffolk District Council and Ipswich Borough Council have cooperated. The existing administrative boundaries which constrain Ipswich justify significant efforts to work with those neighbouring authorities as a priority on cross-boundary issues. This absence of detail weighs against how positively prepared the Final Draft of the Local has been and how effective its approach will be over the plan period, given that strategic matters such as housing needs should not be deferred, noting the opportunities that the east of Ipswich provides, in relation to housing delivery and infrastructure investment.

Market response to density of development.

Within policy CS8 it is stated that through regard to the Ipswich Strategic Housing Market Assessment overall provision of a diverse range of housing will be secured, noting that the policy also states where that document remains up to date. Recent experiences of developing within the water front area in Ipswich has confirmed that there is a weak market for high density flatted development in Ipswich. It is recommended that allocations for schemes are revisited with a view to allow for lower density development. It is also reasonable to question what time period is being used to define if the SHMA is up to date, in addition to recognition that market forces move quicker than the updating of evidence bases that support Local Plans. Defining what those time periods are would allow for clarity in future discussions on what weight can be afforded to alternative sources of evidence against the SHMA, but also provide developers with an element of certainty in discussions that appropriate sources of evidence have been referred to. Underlying links back to where policies CS2 which sets out the locational approach, CS7 detailing housing requirements and DM23 covering housing density, steer development seeking to secure high density development in central sites. A prescriptive approach in the interpretation of these policies would limit opportunities to respond to market forces, and possibly result in more situations such as Griffin Wharf (site reference IP200) where the viability of development is being questioned.

Outdoor amenity space DM7 and Amenity DM18

Policy DM7 proposes minimum standard areas for private outdoor amenity space, but no evidence could be found that supports the figures detailed, including within local design guides. In addition the application of such standards varies between neighbouring authorities, which would reasonably call into question whether this policy has been adequately justified and is consistent with National Policy, whilst also being effective over the plan period. Where the policy details that lower figures may be acceptable where there is unavoidable conflict with the need to meet density requirements, additional flaws in its effectiveness arise due to the questionability of how site densities are calculated given the current limited weight given to market forces and demands for different types of dwellings. In addition it is recognised that the extent of overlooking would be assessed on a case-by-case basis, which is an approach that is welcomed. However, whilst flexibility built into the adopted policy is welcomed, within the supporting text titles of recognised published technical guidance on this matter to provide continuity in the assessment of this issue would be welcomed.

Delivery of Specialist Housing

The Ipswich Housing Market Area Strategic Housing Market Assessment - Partial Part 2 update which forms part of the evidence base details significant increases in the age group of 65 years and over. The final draft of the document on page 23 details as an Ipswich Borough specific issue the impact of a changing population on housing supply will create an increased demand for specialist housing. However, no justification has been provided on why there is a need for 25% of all housing on major developments to be designed to Part M4(2) standards in policy DM12. Without justification it could be argued that this figure is too high, as there may be possible overlap between the provision of specialist housing and the provision market housing, on the final delivery of M4(2) housing. This policy would not therefore be effective over the plan period.

Response by the House Builders Federation

Persimmon Homes has had sight of the representation that is being submitted by the House Builders Federation, and fully endorses the statements that it makes.

Persimmon Homes hopes that these representations are of assistance in the development of Ipswich Borough's Local Plan. Please could Persimmon be notified of the submission of the draft Local Plan to the Secretary of State for independent examination, and the publication of the Planning Inspectors report on the plan.

Yours sincerely,

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**James Melville - Claxton
Planner
Persimmon Homes (Suffolk) Ltd**

www.persimmonhomes.com

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19th February 2020

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Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15th January and 2nd March 2020.

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