

Mersea Homes – DM23 – 26306

We recognise that the purpose of Policy DM23 is to promote higher density development in the most sustainable locations. We have no objections to parts (a) and (b) of the policy accordingly.

In respect of part (c), however, we have two concerns. Firstly, in terms of the Effectiveness of the policy, it is unclear how the Council could ensure that development within Ipswich generally achieved an average of 35 dph across all of the remaining sites in the town. Does that mean, for example, that if developer A obtains permission for a scheme of, say, 37 dph, the next developer B needs to redress the balance and develop at 33 dph? That approach would have potentially some bizarre consequences and would be practically very difficult to implement. Alternative, if the policy is intended to ensure that every single development site in the town is developed at exactly 35 dph, then it is difficult to understand what the Justification is for the policy.

Notwithstanding the difficulties of interpretation and implementation of part (c), we would query whether it is justified in any event, given the need for additional housing and the constraints of the area, for the Council to be seeking “low-density development’ per se. Rather, it would seem more appropriate, in the context of housing supply, for the density of development on any particular site to be the optimum compatible with its surroundings, context, and any limitations of infrastructure. As such, we do not consider that setting an arbitrary density figure in part (c) is appropriate, and instead density for the remainder of the area should be set by contextual factors on a site by site basis.