Ipswich Borough Council

Draft Housing Delivery Action Plan

August 2019

Contents

1 What is the Housing Delivery Action Plan?

1.1 Britain continues to face a housing crisis. Almost all experts agree that the country needs more housing. The Government has introduced a new housing delivery test as a mechanism to monitor delivery locally.

1.2 The housing delivery test measures net additional dwellings provided in a local authority area against the homes required. The Government has defined the housing delivery action plan as.

"*A document produced by the local planning authority to reflect challenges and identify actions to address under-delivery against the housing requirement in the area. The document's purpose is to detail the reasons for under-delivery and the steps the authority intends to take in mitigation and drive up delivery in the area. A good action plan will identify ways to reduce the risk of further under-delivery and set out the case for measures to maintain or improve levels of delivery."*

1.3 All local planning authorities with a result of less than 95% has six months to prepare an action plan. This needs to be published by August 2019.

1.4 An action plan is intended to be a practical document focussed on effective measures aimed at improving housing delivery in an area. However, issues effecting delivery are likely to vary significantly across the country and within individual areas, so for an action plan to be relevant and effective for a particular locality it needs to be underpinned by evidence and research.

1.5 The action plan is not just a planning function but involves a local authority-based approach to prevent future under delivery of housing. It is also important to have positive engagement with development professionals. Preparation of an action plan requires a good understanding of the issues affecting delivery within Ipswich over the last three years, to align with the housing delivery test (HDT) assessment period. It should also have an element of looking forward, to identify potential issues around future delivery.

Figure 1 - Action Plan Processes

2. The Ipswich Position

2.1 Where delivery of housing has fallen below the housing requirement, certain policies set out in the National Planning Policy Framework will apply. Depending on the level of delivery, these are:

Delivery against plan target (%)	**Sanctions**
Less than 95% of requirement	LPAs will need to produce an action plan addressing the under-delivery of houses and take steps to rectify the problem.
Less than 85% of requirement	LPAs will be required to find a 20% buffer of additional land to deliver housing. This may leave undeveloped land vulnerable to speculative applications (in addition to producing an action plan). The buffer will apply immediately.

Less than 25% of requirement (rising to 45% in 2019 and 75% in 2020)*	In these circumstances, the NPPF creates a presumption in favour of sustainable development whereby planning permission will be granted unless the land is protected under the NPPF or the adverse impacts of development outweigh the benefits. This is the most severe sanction LPAs may face and echoes the default position in cases where LPAs are unable to show a five-year housing land supply (in addition to producing and action plan and finding a 20% buffer of additional land).

Figure 2 – Housing Delivery Action Plan Sanctions

2.2 These consequences apply concurrently, for example, those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent housing delivery test measurement is published.

2.3 It should be noted that the threshold for when the presumption in favour of sustainable development applies becomes more stringent and increases from 25% to 45% to 75% by November 2020.

2.4 Whilst Ipswich Borough Council has identified sites and planned for growth, actual delivery rates have not matched those set out in planning policy.

2.5 Ipswich delivered 66% against its housing delivery target which means that a Housing Delivery Action Plan is required as well as the 20% buffer. In total, 117 (35%) local authorities have found themselves in this position.

2.6 Housing delivery has been an issue in the Borough over the period 2011 – 2019, as illustrated by the infographic below:

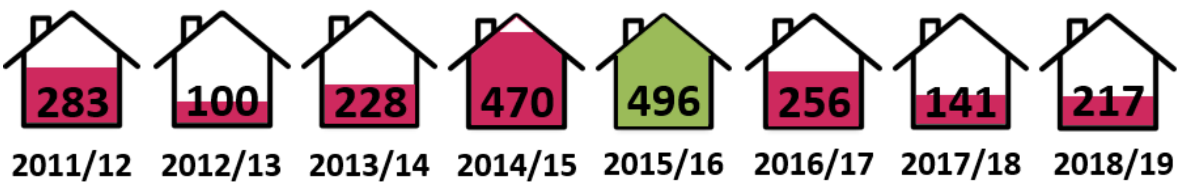

Figure 3 – Housing completions in Ipswich since 2011/12 against annual target of 489 dwellings

3. Understanding the Key Issues

3.1 Within this section, an assessment of the 'under delivery' of new homes in the Borough is considered, which includes the local and national issues which influence housing delivery. A range of data and sources have been used to inform this analysis including the evidence base documents behind the Local Plan.

3.2 As part of this process, the Council has engaged with stakeholders to improve its understanding of the issues effecting housing delivery. The analysis of the issues has been used to inform what actions the Council need to take to improve its housing delivery.

Planning Service Performance Against National Indicators

3.3 The performance for the Local Planning Authorities are measured on their performance based on the percentage of planning applications they determine within 8 or 13 weeks (or within an extension of time agreed with the applicant). For several years the targets have been as follows:

- Majors – 60% within 13 weeks
- Minors – 65% within 8 weeks

3.4 Major development is defined as: More than 10 residential dwellings, dwellings on a site with an area of 0.5 hectares or more, 1,000 sq. m or more of new commercial floorspace or sites with an area of more than 1 hectare. Minor development is defined as: Up to 9 residential dwellings, up to 999 sq. m of new floorspace, changes of use. In the two years Ipswich met these performance indicators.

3.5 In terms of the speed of processing planning applications, in comparison with other local planning authorities, Ipswich Borough is an acknowledged high performer, consistently placed within the top 5% nationally.

Number of major decisions at IBC	Number determined within 13 weeks	Number with a PPA, EoT or EIA	Percentage of major determined within 13 weeks applications (including PPA, EoT or EIA)	Percentage of major applications determined in 13 weeks (excluding PPA, EoT or EIA)
67	36	31	100%	46.9%

Figure 4 - Speed of Major Applications December 2016 – December 2018[1]

Number of minor applications received at IBC	**Number determined within 8 weeks**	**Number with a PPA, EoT or EIA**	**Percentage of major determined within 8 weeks applications (including PPA, EoT or EIA)**
1008	792	207	98.6%

Figure 4 - Speed of Minor Applications December 2016 – December 2018[2]

3.6 The Government has recently also been assessing Local Planning Authorities in terms of planning performance on the following criteria:

- The quality of decisions made by the authority on applications for major development;
- The speed of determining applications for non-major development;
- The quality of decisions made by the authority on applications for non-major development.

Quality of Major Application Decision Making

3.7 In the two years between December 2016 to December 2018, the Council had no major appeals and therefore no major appeals were granted consent[3].

Quality of Minor Application Decision Making

3.8 In the two years from December 2016 to December 2018, the Council received 1,123 minor application from which 21 appeals were received. Of the 21 appeals received only 6 were granted consent[4].

[1] *Source – Table 151A Government Returns https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables*

[2] *Source – Table 153 Government Returns https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables*

[3] *Source – Table 152 Government Returns https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables*

[4] *Source – Table 154 Government Returns https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#historical-live-tables*

3.9 These statistics demonstrate the soundness of decision and that unsound decisions are not being made which would lead to unnecessary delays and costs to the delivery of new homes. However, 46.9% of major applications were subject to an extension of time. Whilst there are good reasons why these types of applications take longer to determine, such as unforeseen issues or the need for amendments, government guidance advises that extensions of time should be the exception. This situation therefore needs monitoring to ensure that the Council continues to comply with government guidance.

3.10 An analysis of applications with completed Section 106 agreements since 2015 showed a wide variation in time taken to complete from Planning & Development Committee resolution to approval – from 44 days to 546 days. This in part is due to the complexity of the application, however, further analysis is required.

3.11 This represents an opportunity for the Council to improve its S106 processes. The Council is also looking to promote the use of pre-application engagement and planning performance agreements to more effectively front load applications.

Planning Performance Against Local Targets

3.12 The performance of the development management function is measured and monitored via the Council's performance manager system.

3.13 The table below shows the key indicators that the Planning & Development Operations Manager will be responsible for delivering.

Indicator	**2018/19 Outturn [5]**	**2019/20 Target**	**2020/21 Target**	**Direction of Travel**
% of new homes built on previously developed land	95%	70%	70%	Improving
Density (average) of new housing on major developments completed during the year (number per hectare)	45dph	40dph	40dph	Level
Net additional homes provided	121	677	479	Level
Supply of ready to develop housing sites (%)	83	100%	100%	Level
New Homes – number of affordable dwellings delivered from private developments	13	90	90	Level

[5] ***Need to update Actuals for 2017/18 when available***

Appeals against refusal of planning applications which are allowed	50	100%	10%	Level
Percentage of applications determined within 8 weeks : a) 60% of Major applications in 13 weeks (DOE codes 1-12)	100%	90%	90%	Improving
b) 65% of minor applications in 8 weeks (DOE codes 13-18)	98%	90%	90%	Improving
c) 80% of other applications in 8 weeks (DOE Codes 19-27)	99%	90%	90%	Improving
% of fully paperless/portal applications dealt with in paperless format	83%	85%	90%	Improving

Figure 5 - DM Performance Against Local Indicators

3.14 The development management function is performing extremely well against local indicators. However, the Council will be revising the indicators to reflect the priorities arising from the Housing Delivery Action Plan.

Implementation of Planning Permissions

3.15 Under planning legislation, permission is required to start within three years from the date of the decision notice. Once planning permissions have been granted, local planning authorities have traditionally had limited influence of the speed of delivery. However, the timescales for implementing planning permissions are considered to be an issue within the Borough.

3.16 The NPPF advises at para. 76 that: *"To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, Housing Delivery Test Action Plan local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start".*

3.17 Going forward Planning Officers will continue to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. Officers will take a proactive approach on non-implemented planning permissions by contacting applicants/agents where there is no evidence of development progressing to find out the reasons why. Officers will be supported through a new digital platform Uniform Enterprise, which will help staff manage their workload more effectively, giving them the time to investigate why permissions are not being implemented and also the ability to analyse application data to assist this process

3.18 The regulations give the opportunity for local authorities to reduce the amount of time a planning decision is valid, it maybe that this is appropriate in Ipswich to help address delays in delivery.

Small Sites

3.19 An analysis of Ipswich's planning approvals shows that approximately one third of housing delivery comes from smaller sites.

3.20 From April 2016 to March 2019 there were 195 completions (net) on sites of 0-9 dwellings. 89 of these were new build (with 9 demolitions) and 115 were change of use/conversions.

Year	Net completions	Expressed as a % of total delivery
2016-17	72	28%
2017-18	47	33%
2018-19	76	35%

Figure 6 - Net completions (sites of 0-9 dwellings)

3.21 These small sites are coming forward without significant input from the local authority. With greater support, small sites could play a greater role in meeting housing needs to increase overall housing output.

3.22 Because of their scale, size and complexity, larger sites can take a number of years to complete due to phasing, site constraints, infrastructure delivery timescales and market absorption issues.

3.23 Small sites can play an important role in meeting interim demand, particularly as many of them are idiosyncratic in shape or context and consequently of less interest to volume builders.

3.24 Small sites can often be delivered relatively quickly often without large upfront capital investment and can therefore make a significant cumulative contribution to overall annual housing completions, helping to supplement the increasing rates of housing delivery on large sites.

3.25 The 2019 NPPF clarifies that small and medium sized sites should make an important contribution towards meeting the needs of an area because they can often be built out relatively quickly.

3.26 The NHBC carried out its own primary research into the challenges facing the development of small sites across the UK.

3.27 This report identifies the following as being the main factors affecting the growth of small house builders and developers nationwide:

- The planning process and associated costs – 38% of the companies surveyed ranked this as their most serious business challenge and 31% ranked it as their second main challenge. This presents a more pessimistic view of the situation than in 2014.

- Availability and cost of viable land – 37% of the companies ranked this as their first and 34% as their second most serious business challenge. This factor has also become a more serious concern since 2014 and is particularly a challenge for small house builders and developers in England compared with other parts of the UK.

- Availability of finance – 20% of the companies regard this as their first and 18% as their second most serious business challenge. This situation has, however, improved since 2014, with reports of better relationships with banks and an increase in the use of private funding sources.

3.28 These are the issues for small house builders which will impact on delivery speed.

3.29 To increase housing output on small sites, the Council will:

- Adopt a more tailored planning policy framework for small sites in the Local Plan;
- Offer greater planning certainty through brownfield registers and accelerated planning mechanisms (e.g. Permission in Principle and Local Development Orders), and
- Seek to support the creation of developer consortiums where an appetite exists. This is where developers can work together and share costs to acquire and deliver sites that they may otherwise be unable to access including portions of larger site.

3.30 Whilst the cumulative impact of smaller sites can help delivery numbers, a vast number are required to come forward, and because of the scale of the development they largely avoid contribution to more essential social and transport infrastructure through S106's. For example, the Council has a threshold of 15 dwellings for the provision of affordable housing. This is because of viability issues and low land values and house prices in Ipswich. This means that even though small sites are important for delivery purposes and the local economy, the cumulative impact of these sites and in particular the impact on social infrastructure is not being addressed.

Viability

3.31 As part of the Ipswich Local Plan review, the Council has engaged Aspinall Verdi to complete a whole plan viability study, which is due for publication in August 2019. Key data from the draft report is shown below.

3.32 The graph below illustrates that Ipswich housing prices are consistently below the national and county averages, although they track the same trajectory.

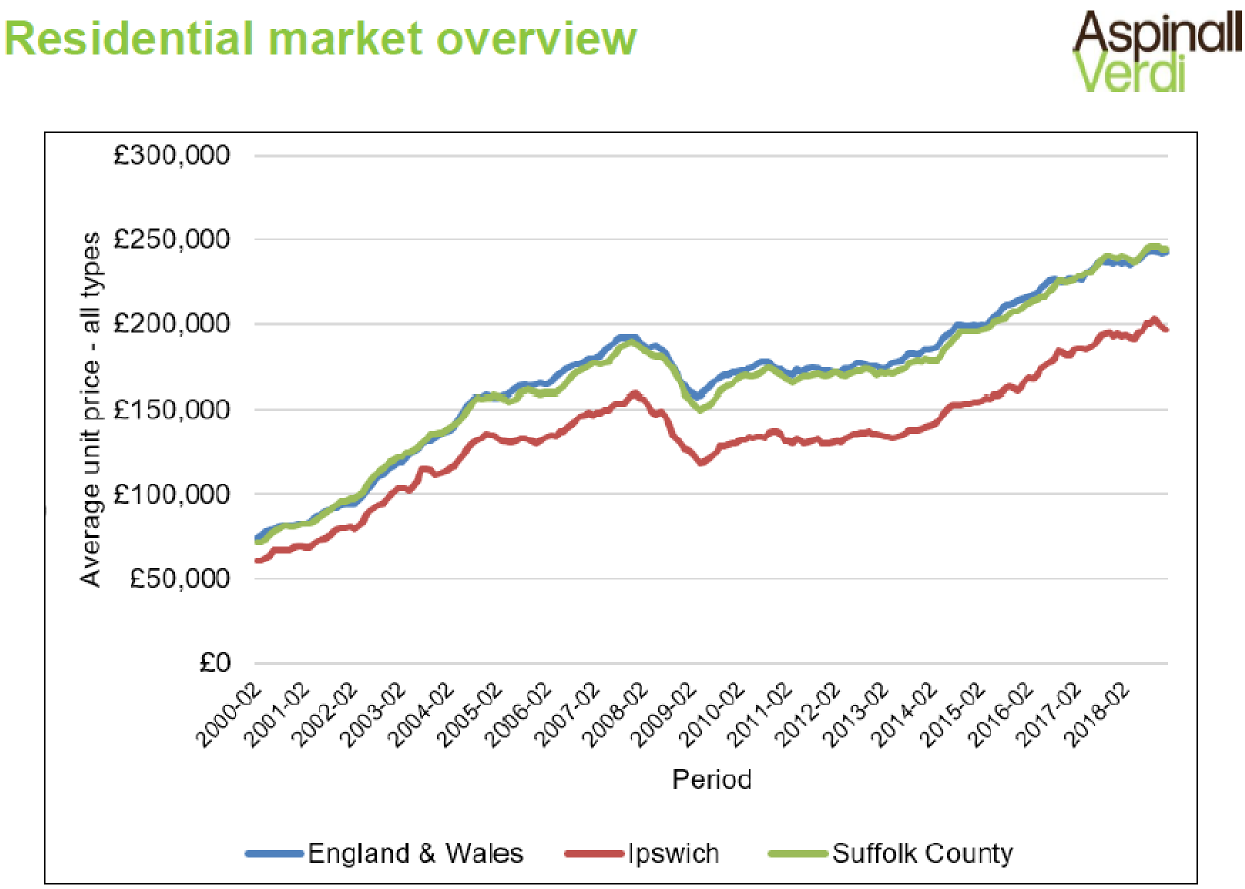

Figure 7 – Residential Market Overview

3.33 The map overleaf illustrates that there is a wide variation in housing values across the Borough and indeed within wards. The heat map below identifies areas where sale prices are likely to be higher, mapped against local plan allocations for the Borough in the emerging local plan.

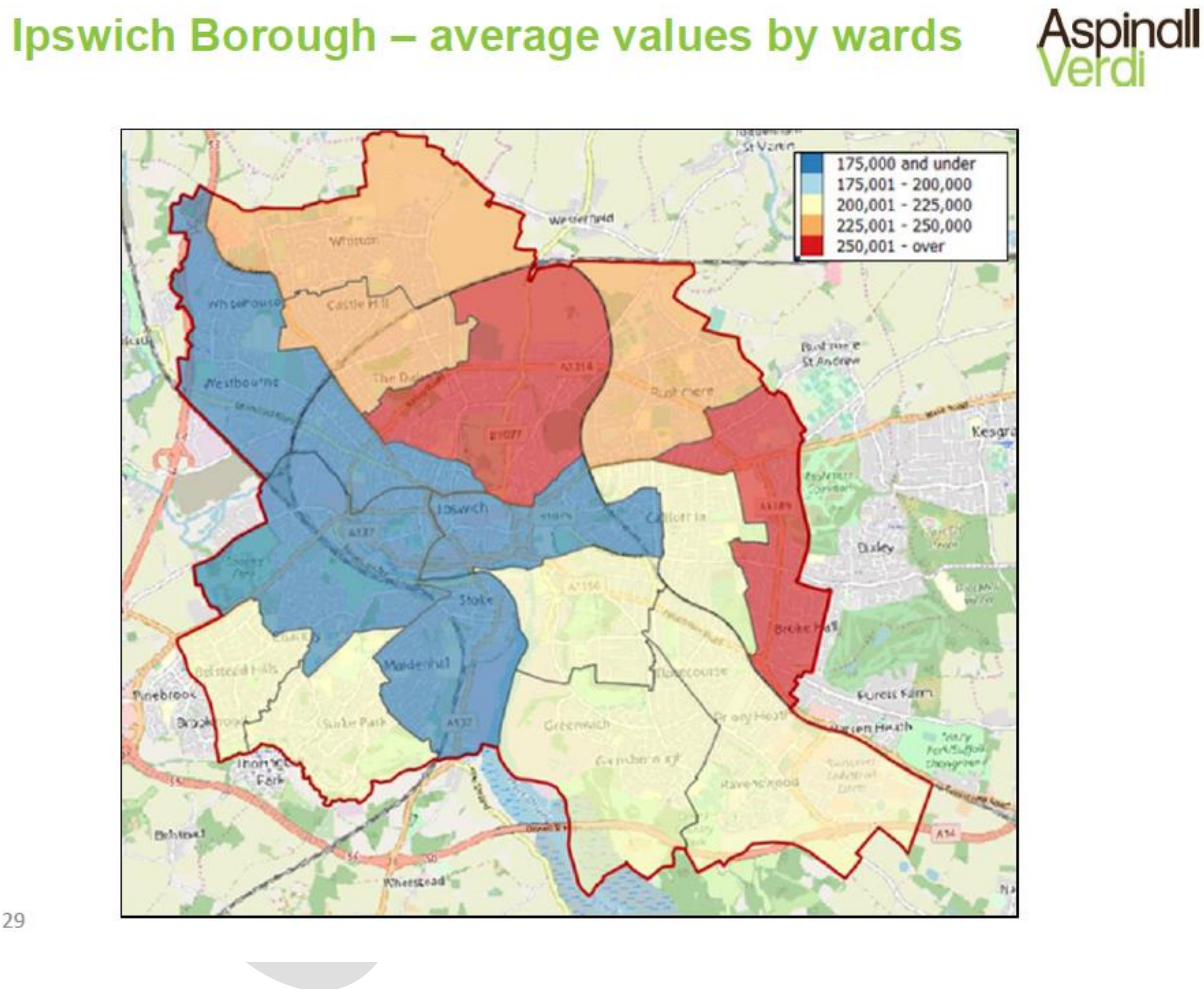

Figure 8 – Average Values by Ward

Ipswich Borough – value heat map with SHELAA sites

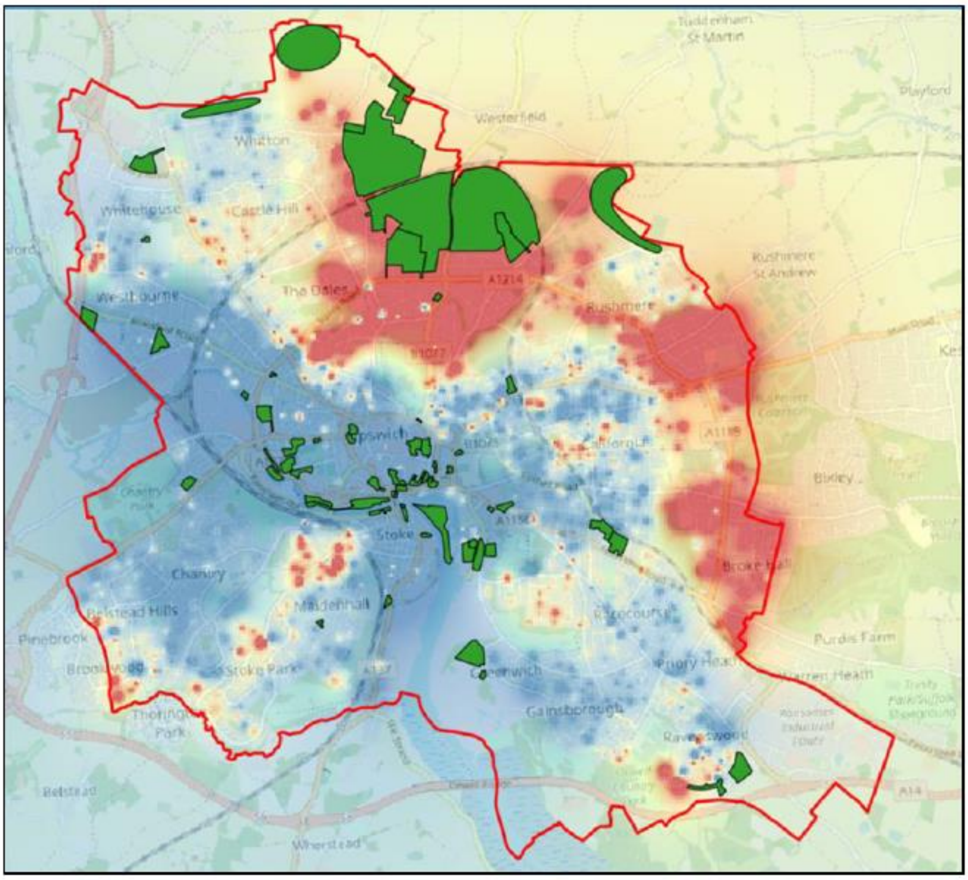

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Figure 9 – Value Heat Map with SHELAA sites

3.34 The heat map above shows that a high number of the smaller sites are located where house prices are generally lowest. One ‘Vision’ of the Local Plan is to regenerate the central area and the waterfront. These allocations are part of the delivery of this ‘Vision’. However, many of these sites are highly constrained and difficult to deliver. We are investigating grant funding to help pump prime housing delivery issues in the ‘cooler’ parts of Ipswich where house prices are lowest. There is a mismatch between the more desirable, easier to develop sites on the edge of Ipswich, which are more attractive to developers and these harder to develop sites. However, the plan looks forward to 2036 and seeks to improve the built environment and viability in these ‘cooler’ areas. This is a more sustainable approach to delivery and is supported by the NPPF 2019 which supports redevelopment of brownfield land.

Tenure Mix

3.35 The map below shows new build completions. Proportionally over time, the majority of new build new homes have consistently been flats. These command a lower sale price in general as can be seen from the tables below.

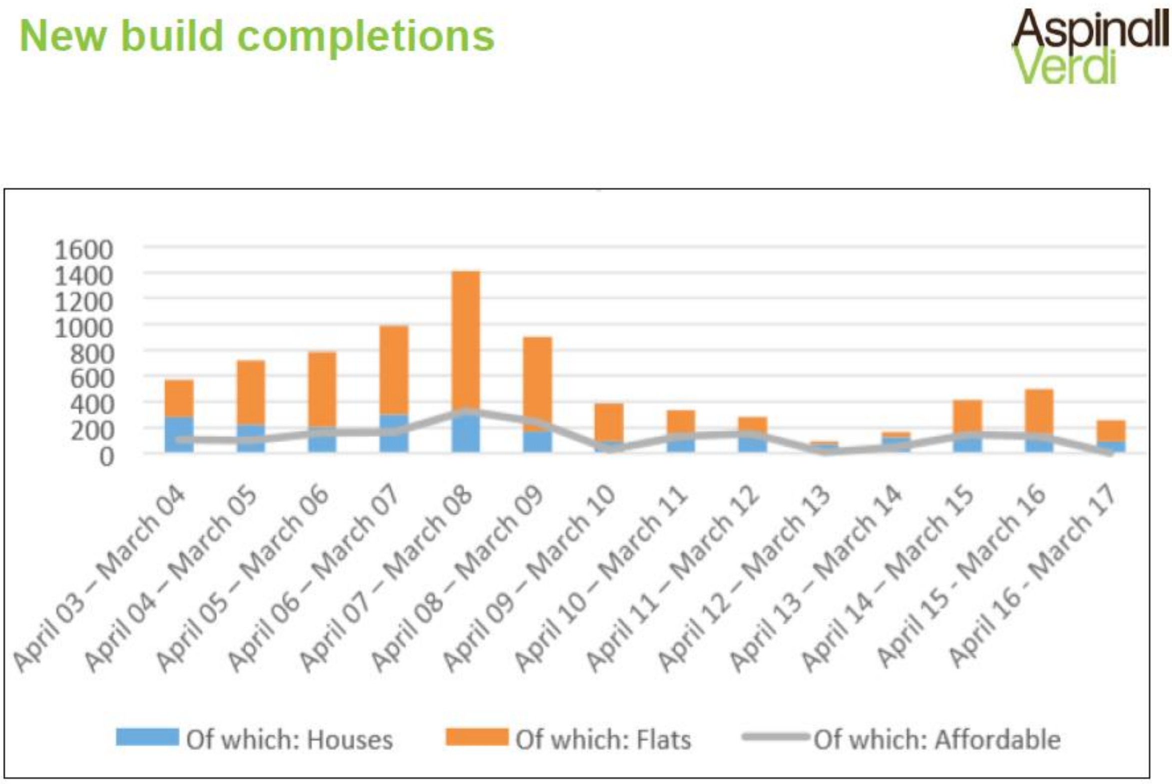

Figure 10 – New Build Completions

New build – sold prices

Electric House, Lloyds Avenue, IP1

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	2-bed	1	63	£185,000	£2,937
Flat	1-bed	1	49	£135,000	£2,755
Flat	N/a	4	54	£148,375	£2,735

Ravens Place, Hawthorn Drive, IP2

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	2-bed	3	64	£126,667	£1,979
Flat	1-bed	2	50	£106,950	£2,139
Flat	N/a	13	61	£120,188	£1,978

Figure 11 – New Build Sold Prices Electric House, Lloyds Avenue and Ravens Place, Hawthorn Drive

NB – these figures are based on the last two years.

New build – sold prices

Ribbans Park, IP3

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Detached	N/a	10	127	£400,422	£3,143
Semi-detached	N/a	29	103	£302,658	£2,925
Terraced	N/a	3	192	£485,717	£2,534
Flats	N/a	11	73	£215,545	£2,938

The Mill House, College Street IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	N/a	15	38	£142,167	£3,722

Figure 12 – New Build Sold Prices Ribbans Park and The Mill House, College Street

New build – sold prices

Westport Place, Foundation Street, IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	1-bed	3	55	£134,667	£2,463
Flat	N/a	7	45	£128,714	£2,888

Alexander House, Fore Street, IP4

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	1-bed	1	58	£137,500	£2,371
Flat	N/a	3	65	£132,832	£2,044

Figure 13 – New Build Sold Prices Westport Place, Foundation Street and Alexander House, Fore Street

New build – sold prices

Wentworth House, Burrell Road, IP2

Typology	No of beds	No of sales	Average unit size sqm	Average price per unit	Average £psm
Flat	N/a	4	55	£144,498	£2,651

One-off recorded sales

Typology	Sold Date	Address	Size sqm	Price Paid	Price £psm
Detached	24/03/2017	20, ELVEDON CLOSE, IP3 9WE	109	£272,995	£2,505
Detached	05/05/2017	1, DUNWICH CLOSE, IP3 9WF	177	£359,950	£2,034

Figure 14 – New Build Sold Prices Wentworth House, Burrell Road and One-off Recorded Sales

3.36 Over recent years urban regeneration objectives have led the Council to focus development into central Ipswich. This has supported the successful regeneration of the Waterfront and Portman Quarter, introducing a greater range of uses into each, thereby adding to their diversity and vibrancy. This strategy has seen significant redevelopment of previously developed sites within the town (including 93% of all housing between 2001 and 2014).

3.37 One consequence however has been that the IP-One area in the Local Plan is driving flat densities at 90 DPH which represents a challenge to site viability, because flats sell at lower prices than houses. In addition, flat sale value is supressing overall housing prices in Ipswich.

3.38 To help address this issue, the Council has identified a large area of housing in the northern fringes of Ipswich which is designed to rebalance the housing mix through the provision of around 3,500 homes. Policy CS10 identifies the development of an area of 195 ha of land known as Ipswich Garden Suburb to form a key component of the supply of housing in Ipswich during the plan period. The policy sets out land uses, with approximate areas, to be delivered. The detailed strategic neighbourhood infrastructure requirements of the development are set out in Table 8B. The garden suburb highlights the importance of a comprehensive development with the supporting infrastructure to be developed in line with the Garden City principles. This site will help to rebalance the housing mix in Ipswich as it is built out and provide a source of well-planned larger family homes. The Council has also secured £9.8 million in Housing Infrastructure Funding (HIF) to support delivery of the development which will go towards infrastructure on the site including a Country Park and bridge across the railway line'. This helps to demonstrate the Council's track record on securing grant aid.

3.39 The 'preferred approach' for housing land value outlined in the Planning Practice Guidance (PPG) is based on the existing use value (EUV) and the 'land owner premium'. The 'premium' is the most challenging aspect to calculate. Uplift needs to be able to cover policy provision elements required. In determining 'premium' level the RICS 'general rule of thumb' is brownfield sites are valued at 10-30% of the original use value and agricultural land is likely to be 10-20 times the agricultural land value (in Ipswich this is closer to the 10 times agricultural value mark).

3.40 The Ipswich and Waveney Housing Markey Areas Strategic Housing Market Assessment identifies the objectively assessed housing needs of the Borough for the plan period to 2036. This shows that by the end of the plan period the housing stock across the Ipswich Housing Market Area (HMA) should comprise 66.5% owner-occupied accommodation, 17.4% private rented homes, 1.3% shared ownership properties and 14.8% social rented/affordable.

3.41 The data shows that some 35.1% of new owner-occupied housing in the Ipswich HMA should be three-bedroom homes, with 27.0% being two-bedroom dwellings, 28.7% should have four or more bedrooms and 9.2% one-bedroom accommodation; 7,282 private rented homes required within the Ipswich HMA, 33.3% should be two-bedroom properties with a further 25.8% should be three-bedroom homes. Some 19.9% should be single bedroom accommodation and 21.0% should have four or more bedrooms.

3.42 The data indicates that of the 2,112 shared ownership dwellings required within the Ipswich HMA, 32.8% should be two-bedroom properties with a further 30.5% three-bedroom accommodation. Some 23.9% should have one bedroom and 12.8% should have four or more bedrooms.

3.43 The data shows that of the 5,420 additional affordable rented dwellings required within the Ipswich HMA over the next 22 years, 30.1% should have four bedrooms, 26.0% two bedrooms, 23.8% one bedroom and 20.1% three bedrooms.

3.44 The data above is being considered alongside the Ipswich Housing Register, which records acute housing need.

3.45 The emerging Local Plan continues to support higher densities where appropriate, but also alternative housing forms such as town houses with ground floor flats to deliver a wider range of housing mix to meet identified needs.

Site Constraints

3.46 In addition to the above, a number of sites in Ipswich are highly constrained, which increases the cost of development and inevitably reduces deliverability potential. Principally these issues are as follows:

<u>Archaeology</u>

3.47 Historic towns and cities are highly sensitive archaeological sites, where buried features, finds and standing monuments form a unique and irreplaceable record of a settlement's unwritten history. As a historic port, aspects of the archaeological record in Ipswich are nationally important.

3.48 However, Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time.

3.49 The wider Borough includes the medieval suburbs, later development of the docks, and significant earlier remains relating to the Prehistoric, Roman and Early Saxon contexts within which the town developed.

3.50 This results in high upfront development costs and mitigation and introduces an element of uncertainty which is affecting the interest shown by developers. These sites are often those with an active permission and or allocation in the local plan but are stalled.

3.51 Again, the Council is looking to secure funding to bring these sites forward to reduce uncertainty. The Council will also be considering whether any of these sites would be suitable for compulsory purchase which will have a positive impact on delivery and would demonstrate community leadership on how to bring these sites forward.

<u>Contamination</u>

3.52 As a historic industrial area and port with river frontage, Ipswich has areas of ground contamination which need to be mediated before sites can be developed for housing. Indeed, until contamination is examined it is impossible to ascertain suitability for housing uses. This is another area of uncertainty for landowners and potential developers and is supressing land values. These sites are not coming forward at the rate the Council need to deliver housing.

Flood Risk

3.53 Environment Agency investment in the Ipswich Tidal Barrier is likely to have had a significant positive effect on the potential of flooding in the town centre and waterfront areas. This is currently being tested through the refresh of the Ipswich Strategic Flood Risk Assessment (SFRA). This may facilitate sites coming online which were previously severely constrained through flood risk. However, the impact of the barrier will be examined against predicted higher levels of sea level rise, the result of climate change.

3.54 In addition, the typography of Ipswich is that of steep river valley sides which can create problems of surface water flooding. Again, this will be examined through the refresh of the SFRA and is likely to require investment of strategic sustainable urban drainage systems (SUDS).

Self-Build / Custom Build

3.55 The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) places a duty on local authorities to keep a register of individuals and associations of individuals who wish to acquire plots of land on which to build their own home and to publicise that register. The Act also places a responsibility on councils to permission enough serviceable plots for self-build or custom build housing in order to meet this demand.

3.56 The Ipswich self-build and custom build register has been running since March 2015. Demand is measured in 'base periods' that run from the start of the register until 30th October 2016 and then annually from 31st October until 30th October the following year.

3.57 During the first base-period, the IBC Self-Build and Custom Housebuilding Register received 22 eligible applications for entry onto the register. As such, by 31 October 2019 IBC has a duty to facilitate suitable development permissions for a minimum of 22 serviced plots. In total, there are 74 people on the Ipswich register.

3.58 To date the Council have been unable to identify and supply serviced self-build and custom build plots to meet its identified need. Going forward the Council is to introduce 'Local Eligibility Conditions' which would make the new 2-part self-build register and duties arising from it more manageable.

Affordable Housing Delivery

3.59 This section outlines the Council’s approach in relation to accelerating supply of affordable housing in Ipswich.

3.60 There are approximately 60,810 dwellings in Ipswich. 47,620 of these are in the private sector. 8,040 (sheltered and general needs) are owned by IBC. The remainder are other public sector and private registered providers.[6]

3.61 2017/18 saw the completion of 141 homes. The number of housing completions has decreased from the 2016/17 figure and they remain below the peak of 2007/08 and also the Core Strategy annual target (489), 20 of the completions were affordable housing completions (14%).

3.62 In the context of Ipswich, and the Ipswich Housing Market Area, the gap between affordable rent and market rent is smaller than the gap between market rent and entry level home ownership. The gaps for four-bedroom accommodation are particularly large. The notable gap recorded between affordable rents and market entry rents for most dwelling sizes indicates that intermediate housing could potentially be useful for a large number of households. The very large gap between market entry rents and market entry purchase in all cases indicates notable potential demand for part-ownership products for households in this gap.

3.63 To address this issue the Council is being pro-active in building its own affordable housing (across 20+ sites in the borough) and has an aspiration to develop 1000 new affordable homes within a decade. Moreover, the Council is also investing a further £11 million in improving its existing housing stock.

Housing Monitoring

3.64 During the course of producing the Housing Delivery Action Plan, the Council has recognised that housing monitoring requires more investment. To address this issue the Council is looking to employ a monitoring officer on a part time basis and ensure both its Planning Policy and Development Management Teams are adequately resourced. The Council has also committed to reviewing what it elects to monitor, to refocus attention on those factors that influence housing delivery.

Strategic Housing and Employment Land Availability Assessment (SHELAA) Findings

[6] Table 100; number of dwellings by tenure and district, England. Gov.uk.

3.65 The Council undertook a ‘call for sites’ in the autumn of 2017 as part of the early preparation stage for the new Ipswich Borough Council Local Plan Review. The SHELAA is an assessment of development potential of the sites that come forward. The SHELAA housing sites that were deemed developable were taken forward through the Local Plan process. As part of the preparation of this delivery plan rejected sites from the SHELAA were reappraised, however, no additional sites were identified for housing development.

4. Root Cause Analysis

4.1 As highlighted above, developing housing is often a complex process. There are a number of challenges and barriers to overcome before a buyer can take possession of a property. Many of these barriers are macro-economic in nature, for example access to finance for both developers and potential house buyers, whilst others may be more site specific such as land contamination. These barriers affect both the supply and demand side of housing delivery. The following provides a summary of the key challenges associated with bringing housing development forward in Ipswich.

a) Ipswich has an extremely tight geographical boundary and a very limited number of developable sites. There is a shortage of greenfield land available in Ipswich, meaning that brownfield sites predominate. Brownfield sites are more expensive to develop and only offer 10-30% their original use value premium as a rule of thumb.

b) There are a high number of unbuilt permissions across Ipswich.

c) Ipswich has a significant number of highly constrained sites, which increases the cost of development and reduces deliverability potential.

d) Ipswich house prices (although increasing) and land values are consistently lower than the national average.

1. Key Actions

1.1 There are often other factors beyond any council's control which explain why sites for housing do not come forward for development. It therefore requires a broader approach to be taken to increase the delivery of new homes and the use of tools beyond the traditional remit of the Local Planning Authority.

<u>Corporate Prioritisation of Housing Delivery</u>

a) Setup a model to run affordable housing provision on sites for developers. This will make affordable housing provision more attractive to developers;
b) Work with neighbouring authorities to explore development opportunities;
c) Monitor and bid for infrastructure funding as and when opportunities arise in conjunction with the landowners;
d) Develop a model to intervene through compulsory purchase where this is necessary and is suitable for implementation locally, working with development partners to deliver them; and
e) The Council will continue to build relationships with developers and house builders to understand the challenges of bringing sites forward and establish a working group of planning agents to raise the quality of applications. This includes developer forum events to identify challenges and unblock them.

<u>Improving the Planning Process</u>

1.2 The Council recognize the key role the planning service plays has to play in facilitating growth. The Council will ensure the delivery of an efficient and effective planning service by:

a) Undertaking a review of all local plan housing allocations with a view to increasing densities as appropriate;

b) Promote relationship building with developers and encourage delivery. Where applications have a lapsed or are about to lapse the Council should adopt a proactive position and investigate with the applicant the reasons why sites have not come forward;

c) Develop a Development Management Improvement Plan to improve S106 procedures in conjunction with legal services and appoint a S106 monitoring officer;

d) Promote the use of pre-application submissions and Planning Performance Agreements;

e) Implement new technologies including a new digital platform (Uniform Enterprise) to streamline the process; and

f) Complete Part 2 of the Brownfield Register to enable use of Permission in Principle.

Supporting the Market to Deliver

a) Continue to proactively market the town and development sites to potential development partners through a coordinated, corporate approach involving all relevant departments. Act proactively to seek out opportunities such as attending conferences and construction industry events to market the town to potential new investors.

b) Allocation of more land in areas which have ‘red’ heat which will provide bigger premiums to developers but not at the expense of regeneration objectives

c) Enhance the potential role of small and medium sized housebuilder. The Council will seek to support the creation of developer consortiums where an appetite exists. This is where developers can work together and share costs to acquire and deliver sites that they may otherwise be unable to access including portions of larger sites.

Action Plan

Action	Priority	Responsible	Timescale	Review
AP1 - Setup a model to run affordable housing provision on sites for developers	High	Housing / Cooperate	Short/ medium term	Annually
AP2 - Work with neighbouring authorities.	High	Planning Policy	Short term	Annually
AP3 - Monitor and bid for infrastructure funding.	High	Planning Policy	Short/ medium term	Annually
AP4 - Compulsory purchase	Medium	Planning Policy	Long term	Annually
AP5 - Build relationships with developers	High	Planning Policy	Short term	Annually
AP6 - Undertake a review of all local plan housing allocations with a view to increasing densities as appropriate	High	Planning Policy	Short term	Annually
AP7 - Review S106 procedures and appoint a Monitoring Officer	High	Planning Policy	Short/ medium term	Annually
AP8 - Promote use of pre-applications and Planning Performance Agreements	Medium	Development Management	Short/ medium term	Annually
AP9 - New digital platform (Uniform Enterprise)	Medium	Development Management	Short/ medium term	Annually
AP10 - Completing Part 2 of the Brownfield Register which would establish the suitability in principle of land for housing led development. This type of consent purportedly provides greater certainty for developers that the fundamental	High	Planning Policy	Short term	Annually

principles of development are acceptable, before the need to get into costly technical matters.				
AP11 - Place marketing and promotion.	Medium	Corporate	Medium term	Annually
AP12 - Allocation of more land in areas which have 'red' heat which will provide bigger premiums to developers.	High	Planning policy	Post 2020 for inclusion in the new local plan post this current review	Annually
AP13 - Enhance the role of small and medium sized house builders.	High	Corporate	Short-medium term	Annually

2. Monitoring Progress

2.1 Action planning should not be a one-off piece of work, as some elements may take time to implement and take effect. Monitoring should form part of the wider process around the Annual Monitoring Report (AMR). The Government is clear that the responsibility for meeting housing need falls on the local authority as a whole and therefore it will be necessary to secure ongoing support across all relevant departments.

2.2 The actions will be implemented, managed and monitored through an existing corporate steering group.

2.3 With regard to marketing of sites, this will be managed by the Economic Development Team.

2.4 The Council will carry out a full review of the Housing Delivery Action Plan annually to report on performance and whether actions should change depending on effectiveness.

2.5 The monitoring of the development management function will continue to be measured and monitored via the Council's performance management system.