

# Ipswich Borough Council Local Plan

## Statement of Compliance with the Duty to Co-operate

December 2015



Planning and Development  
Ipswich Borough Council  
Grafton House, Russell Road  
Ipswich IP1 2DE  
(01473) 432019

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

website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

## **Contents**

1. Introduction
2. Ipswich Borough context
3. Neighbouring local planning authorities
4. Key management / operational arrangements
5. Suffolk Devolution proposals
6. Addressing strategic issues
7. Undertaking joint studies
8. Summary of co-operation in the preparation of the Ipswich Local Plan

Table 1 – Summary of Duty to Co-operate process

Table 2 – Site Allocations

Appendix 1 – Plan showing the Ipswich Policy Area

Appendix 2 – Draft Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area (December 2015)

Appendix 3 – Ipswich Policy Area Board Terms of Reference (October 2015)

## 1. Introduction

This statement relates to the review of the Core Strategy and Policies Development Plan Document and to the production of the Site Allocations (incorporating IP-One Area Action Plan) Development Plan Document. An initial version was produced in November 2014 as part of the Proposed Submission consultation and a second version was produced in August 2015 which accompanied the Pre-Submission Main Modifications consultation. This version has been revised to reflect up to date circumstances.

The Duty to Co-operate (the duty) was introduced through Section 110 of the Localism Act 2011 in November 2011. The Act inserts a new Section 33A into the Planning and Compulsory Purchase Act 2004. The duty is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic cross boundary matters.

The National Planning Policy Framework (NPPF) published in March 2012, provides guidance on planning strategically across local boundaries (paragraphs 178-181). In particular this relates to paragraph 156 of the NPPF, which advises that local planning authorities should set out strategic priorities in the Local Plan. These strategic priorities of relevance for Ipswich and the production of the two DPDs are:

- housing development to meet the objectively assessed housing need: Ipswich sits within a wider housing market area. This is a particular issue for Ipswich due to the Borough boundary being tightly drawn around the town resulting in it not being possible to meet need within the Borough
- provision for Gypsies and Travellers: provision needs to be considered on a wider scale than within the Borough, informed by the results of the Gypsy and Traveller Accommodation Assessment;
- facilitating the jobs needed: Ipswich sits within a wider functional economic area;
- transport infrastructure: the Travel to Work Area extends beyond the boundaries of the Borough;
- addressing flood risk: many of the sites within the IP-One area are dependent upon the delivery of the tidal barrier;
- protection of heritage assets: the central part of Ipswich in particular contains a concentration of heritage assets;
- addressing cumulative impacts on Special Protection Area: the Habitats Regulations Assessment sets out mitigation measures which relate to in combination growth across Ipswich and Suffolk Coastal;
- identification of green rim: due to the boundary of Ipswich being tightly drawn it is necessary to consider green infrastructure provision across an area wider than the Borough;
- site allocations in peripheral parts of the Borough: these need to be considered alongside proposals beyond the boundary.

The NPPF in paragraphs 178-181 advises that local planning authorities should work collaboratively together to meet development requirements that cannot be wholly met within their own areas – for example a lack of physical capacity, and consider producing joint planning policies on strategic matters. Local authorities should also take account of travel-to-work areas and will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when Local Plans are submitted for examination.

The national Planning Practice Guidance (PPG) introduced in March 2014 provides further guidance on undertaking the duty, which requires a proactive, ongoing and focused approach to strategic planning and partnership working.

The Core Strategy and Policies DPD represents a review of the adopted Core Strategy (2011) which was produced in the context of the East of England Plan. Strategic issues that are being addressed through the review are therefore those which have evolved or emerged since the production of the East of England Plan. Due to the relatively recent revocation of the East of England Plan, new strategic planning mechanisms are still evolving.

## 2. Ipswich Borough context

Ipswich Borough Council is responsible for planning the town of Ipswich which is the county town of Suffolk. The Borough has relatively tight administrative boundaries and adjoins Babergh, Mid Suffolk and Suffolk Coastal District Councils. Areas of the town including Pinewood to the south and Bixley Heath to the east fall within Babergh and Suffolk Coastal districts respectively. An Ipswich Policy Area (IPA) has formal planning status set out in local planning authority development plan documents and has played a leading strategic role in accommodating housing and employment growth within Suffolk.

## 3. Neighbouring local planning authorities

### Babergh District Council

Babergh borders the southern and south western boundary of Ipswich Borough. The two main towns are Hadleigh and Sudbury connected to Ipswich by the A1071. Significant housing development has occurred at Pinewood on the fringe of Ipswich.

### Mid Suffolk District Council

Mid Suffolk borders the western and north western boundary of Ipswich Borough. The two main towns are Stowmarket and Needham Market both connected to Ipswich via the A14 and the Ipswich to Cambridge railway line. Significant housing development has occurred in Stowmarket which is adjacent to the railway station connected to Ipswich via main London to Norwich line.

### Suffolk Coastal District Council

Suffolk Coastal borders the eastern, north eastern and south eastern boundary of Ipswich Borough. There are a number of market towns in the district with Felixstowe and Woodbridge close to Ipswich connected by the A14 and A12 respectively and by railway lines. Significant housing development has occurred along the A1214 towards Martlesham at Kesgrave and towards Felixstowe at Purdis Farm.

## 4. Key management / operational arrangements

There are a number of cross organisation groups and bodies in operation in Suffolk at a number of different levels. Whilst these may reach agreement around particular issues it should be noted that formal Member decision making processes remain vested in each individual authority.

### Ipswich Policy Area

The Ipswich Policy Area (IPA) arose following recognition in the 1990s that there were limitations on land available within the Borough boundary, which necessitated an

examination of a wider policy area to meet the requirements for housing and employment growth, and related infrastructure needs, centred on Ipswich. Accordingly the IPA was included in subsequent formal planning documents.

The geography of the IPA includes Ipswich and nearby parishes in each of three aforementioned districts, being extended to include Westerfield following adoption of the Suffolk Coastal Core Strategy and Development Management Policies development plan document in July 2013 shown in Appendix 1.

The Ipswich Board Area Board was established in 2007 and meetings have been held regularly since December 2011, following the demise of the East of England Regional Assembly. The Board is made up of one officer and one councillor from each of the three districts, Ipswich Borough Council and Suffolk County Council. A Statement of Intent to joint working on strategic issues through the IPA Board, signed by the Chief Executives of each authority, was agreed in May 2011. The terms of reference of the IPA Board were revised in 2011 and agreed at the meeting held in December 2011. They were revised further in 2013 and were taken through political report structures at each authority between December 2013 and January 2014. They were further revised in October 2015 and are shown in Appendix 3. They state the purpose of the IPA Board is:

- To provide a forum in which the five local authorities can work together to develop, promote and deliver their vision for the Ipswich Policy Area as a major economic growth area within the Greater Ipswich sub region, County of Suffolk and New Anglia Local Enterprise Partnership.
- To enable them to co-operate as local planning authorities on the preparation and monitoring of their Local Plans and share relevant evidence and intelligence.
- To provide a mechanism to ensure that all partners and stakeholders work together to deliver the housing and employment growth targets for the Ipswich Policy Area and coordinate the delivery of the necessary infrastructure – including transport, education, skills, power, green infrastructure, flood and coastal defences.

Meetings of the IPA Board have been held recently on 21<sup>st</sup> November 2013, 10<sup>th</sup> January 2014, 4<sup>th</sup> July 2014, 5<sup>th</sup> September 2014, 7<sup>th</sup> November 2014, 19<sup>th</sup> December 2014, 5<sup>th</sup> February 2015, 20<sup>th</sup> March 2015, 5<sup>th</sup> June 2015, 7<sup>th</sup> August 2015 and 15<sup>th</sup> October 2015. Action notes from each meeting with the exception of 15<sup>th</sup> October 2015 are available to view at <https://www.ipswich.gov.uk/content/ipswich-policy-area>.

In May 2011, as part of the Examination into the adopted Ipswich Core Strategy, a letter from the Chief Executive of Ipswich Borough Council outline those strategic matters under which co-operation was ongoing or required across the Ipswich Policy Area. The adjoining districts each responded with a letter of support.

Officers from each authority have continued to meet to produce papers for the Board to consider including a review of the IPA boundary, land availability in the IPA, functional economic geographies based on the Ipswich travel to work area, and the Ipswich housing market area objectively assessed needs. In addition work is being undertaken by officers on an economic needs assessment for the Borough and the three districts to update previous employment land reviews. These papers are listed below in section 6. The IPA Board endorsed the first version of this duty to co-operate statement at its meeting on 7<sup>th</sup> November 2014 and, following the nomination of new Members to the Board as a result of local elections in May 2015, the Board were verbally updated at their meeting on 7<sup>th</sup> August 2015. A revised IPA boundary is likely to be determined.

At the meeting on 15<sup>th</sup> October a draft Memorandum of Understanding was presented to the Board. This would form a commitment to meeting the housing need of 34,250 identified in 2013 for the Ipswich Housing Market Area, within the Housing Market Area. It was agreed that a further draft would be presented to leaders for consideration. A final draft is shown in Appendix 2.

Ipswich Borough Council and Suffolk Coastal District Council have reviewed their Local Development Schemes to commit to the production of a joint or aligned local plan with work programmed to begin in 2016. It is anticipated that Babergh and Mid-Suffolk will do the same.

### New Anglia Local Enterprise Partnership

Ipswich Borough falls within the New Anglia Local Enterprise Partnership (NALEP) area, which covers Norfolk and Suffolk and includes 14 district and borough authorities and two county authorities. Ipswich Borough Council contributed to the production of the NALEP Strategic Economic Plan (SEP) which focuses on new jobs, businesses and homes and increased productivity. To achieve this NALEP identify five high impact sectors for the NALEP economy together with four underpinning sectors, which are the largest employers in the NALEP economy. These are shown below.

High impact sectors:

- Advanced Manufacturing and Engineering
- Agri-tech
- Energy
- ICT/Digital Culture
- Life Sciences

Underpinning sectors:

- Agriculture and food and drink
- Financial and insurance services
- Ports and logistics
- Tourism and culture

The sectors which are particularly well represented in Ipswich are: information and communication technology, finance and insurance, port and logistics, tourism and creative and cultural industries.

The Core Strategy review through policy CS13 supports the growth of jobs in these sectors, particularly in Ipswich town centre and in existing employment areas. Additional land is also identified for allocation to support the delivery of the target set in the policy of approximately 12,500 jobs in the Borough between 2011 and 2031.

Ipswich Borough Council is also working with Babergh, Forest Heath, Mid Suffolk, Suffolk Coastal and Waveney District Councils, St Edmundsbury Borough Council and Suffolk County Council, focusing on growth in Suffolk and which resulted in the publication of the Suffolk Growth Strategy in 2013. This supports the aspirations of NALEP.

In addition the Greater Ipswich City Deal which involves NALEP, Ipswich Borough Council, Suffolk County Council and Babergh, Mid Suffolk and Suffolk Coastal District Councils, will help achieve Greater Ipswich's long term vision for the local economy, shown below:

- A highly skilled and flexible workforce that can respond to the changing demands of our leading technology sectors.
- An internationally significant cluster for research and application of ICT and digital technologies and a new strength in agri-tech ICT applications.
- Recognition as a UK cluster for biotechnology and advanced manufacturing.
- Significant centre in the financial services industries, taking advantage of proximity to London and with particular expertise in the growing technology sectors.
- A strong net contributor to the UK economy with high earning potential and low unemployment.
- An international hub for renewable and offshore energy and the supply chains.

### Suffolk Growth Group

Suffolk Growth Group comprises senior officer representatives of local authorities in Suffolk. It meets regularly and has recently agreed five areas of work for Growth Group 2:

- New deal with University Campus Suffolk
- Skills
- Housing performance
- Inward Investment
- Joint Strategic Planning – includes transport & infrastructure

### Suffolk Chief Officers Leadership Team

Suffolk Chief Officers Leadership Team comprises the Chief Executives of all the Suffolk Councils, the Chief Constable and the Executive Leads for other Public Services.

### Suffolk Public Sector Leaders Group

Suffolk Public Sector Leaders Group comprises Leaders and Chief Executives of Suffolk Councils, The Police and Crime Commissioner, Chief Constable and Chairs of the Clinical Commission Groups.

## 5. Suffolk Devolution proposals

The Suffolk local authorities, along with other Suffolk public sector organisations and the New Anglia LEP submitted a proposal to Government in September 2015. Part of the devolution proposal referred to the potential creation of a Suffolk Strategic Plan. The devolution proposal can be viewed via the link below.

<http://www.suffolk.gov.uk/assets/suffolk.gov.uk/About/2015-09-07%20Devolution%20Proposal.pdf>.

## 6. Addressing strategic issues

An account of how each strategic issue identified above has been addressed through the Duty to Co-operate is set out in Table 1 below. It should be noted that although the issues have been set out as broad themes there are clear overlaps between these, for example the provision of or improvements to transport infrastructure help to support actions around economic growth.

The following bodies are relevant in the context of the duty for Ipswich Borough, however their involvement in addressing the strategic issues identified varies depending on the relevance of the issue:

- Babergh District Council
- Mid Suffolk District Council
- Suffolk Coastal District Council
- Suffolk County Council
- Historic England (formerly English Heritage)
- Environment Agency
- Homes and Communities Agency
- Marine Management Organisation
- Natural England
- New Anglia Local Enterprise Partnership
- NHS Ipswich and East Suffolk Clinical Commissioning Group
- Office of Rail Regulation
- Wild Anglia Local Nature Partnership

In addition Ipswich Borough Council has also co-operated with Anglian Water in preparation of the Local Plan.

#### Regulation 18 & 19 public consultation

Alongside the ongoing co-operation outlined in Table 1 formal consultation has also formed part of the production of the plans, as detailed in the Consultation Statement. Ipswich Borough Council undertook a public consultation on a draft Core Strategy and Policies development plan document (DPD) focused review and a draft Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD between 13<sup>th</sup> January and 10<sup>th</sup> March 2014. Consultation on the Proposed Submission plans took place between 12<sup>th</sup> December 2014 and 5<sup>th</sup> March 2015 and consultation on Pre-Submission Main Modifications took place between 9<sup>th</sup> October and 23<sup>rd</sup> November 2015. Representations received from the Duty to Co-operate bodies form part of the ongoing dialogue with these organisations and are detailed in Table 1 where relevant.

#### 7. Undertaking joint studies

A number of studies have been jointly commissioned or undertaken, which inform the evidence base for the Ipswich Local Plan documents. These include:

- Employment Needs Assessment (to be published, being undertaken with Babergh, Mid Suffolk, Suffolk Coastal and Waveney District Councils)
- Haven Gateway Green Infrastructure Strategy 2008 – Ipswich Policy Area Update (August 2015)
- Suffolk Housing Survey (undertaken with Babergh, Forest Heath, Mid Suffolk, Suffolk Coastal and Waveney District Councils, and St Edmundsbury Borough Council)
- Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (October 2013) (commissioned by Babergh, Mid Suffolk, Suffolk Coastal and Waveney District Councils and Ipswich Borough Council)
- Ipswich Housing Market Area Population and Household Projections (September 2013) (commissioned by Ipswich Borough Council and available to Babergh, Mid Suffolk and Suffolk Coastal District Councils)



- Ipswich Housing Market Area Strategic Housing Market Assessment (August 2012) (commissioned by Babergh, Mid Suffolk and Suffolk Coastal District Councils and used by Ipswich Borough Council)
- Suffolk Haven Gateway Employment Land Review and Strategic Sites Study (September 2009) (commissioned for Babergh and Suffolk Coastal District Councils and Ipswich Borough Council)

In addition papers have been produced for the IPA Board, which are available to view at <https://www.ipswich.gov.uk/content/ipswich-policy-area> and are listed below:

- Boundary review topic paper, 4<sup>th</sup> July 2014
- Land availability topic paper, 4<sup>th</sup> July 2014

#### 8. Summary of co-operation in the preparation of the Ipswich Local Plan

Ipswich Borough Council has demonstrated a significant level of co-operation with other authorities and public bodies in the preparation of the Core Strategy and Policies DPD review and the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD. The Council has participated in and continues to participate in joint projects with other authorities on key evidence base documents and through regular meetings of the Ipswich Policy Area Board. The Council continues to work closely with key infrastructure providers to ensure the two development plan documents will deliver the infrastructure required to support development in Ipswich Borough. It must be recognised that working with other bodies on strategic planning issues is an ongoing process and this statement will be updated periodically to reflect further progress.

Table 1 – Summary of Duty to Co-operate process

<b>Strategic Issue</b>	<b>Management and Working Arrangements</b>	<b>Evidence base</b>	<b>Outcome</b>	<b>Ongoing co-operation</b>
<p>Housing provision: Ipswich borough is tightly bounded and there is little scope to meet housing needs solely within the Borough itself. The Housing Market Area extends over the four local authority areas of Ipswich, Babergh, Mid-Suffolk and Suffolk Coastal.</p>	<p>The Ipswich Policy Area Board have, on an ongoing basis, discussed housing need in the Ipswich Housing Market Area at their meetings.</p> <p>The Suffolk Planning Officers Group, which provides a forum for officer based discussion of strategic planning issues, has facilitated officer level co-operation on this issue.</p> <p>Suffolk Growth Group (see above).</p> <p>Meetings were held with adjoining authorities in May and June 2014 to discuss specific issues.</p>	<p>Strategic Housing Market Assessment 2012. Covers the Ipswich Housing Market Area which comprises Ipswich Borough and Babergh, Mid-Suffolk and Suffolk Coastal Districts.</p> <p>Ipswich Housing Market Area Population and Household Projections - An Analysis of Demographic Change 2013. Covers the Ipswich Housing Market Area which comprises Ipswich Borough and Babergh, Mid-Suffolk and Suffolk Coastal Districts.</p> <p>Suffolk Housing Survey (to be published shortly) – identifies housing need across Suffolk.</p>	<p>Policy CS7 identifies that the Council will work with neighbouring planning authorities to address housing need later in the plan period.</p> <p>In November 2013 the IPA Board agreed to work together on housing and employment needs and agreed that needs arising within the IPA would be met within the IPA.</p> <p>The IPA authorities therefore in their future work programmes are to consider unmet housing need in the IPA as a result of not being able to meet the need in Ipswich due to a constrained land supply. In the case of Babergh and Mid Suffolk District Councils, this was agreed at their Strategy Committee in April 2014. This need will be considered through current and future IPA Local Plans and subject to strategic environmental</p>	<p>Ipswich Borough and Suffolk Coastal have recently brought into effect revised Local Development Schemes which contained aligned timetables for the production of joint or aligned local plans. Work is programmed to start in 2016.</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
			assessment.	
<p>Gypsy and Traveller accommodation: Identification of permanent and short stay sites across Suffolk.</p>	<p>The Suffolk Gypsy and Traveller Accommodation Needs Subgroup is an officer group representing the district and borough councils and Suffolk County Council, including the Gypsy and Traveller Liaison Officer. The group acts as an information sharing group with sub-groups set up in relation to specific tasks.</p> <p>In relation to the current work around identifying 3 short stay sites across Suffolk, this is being undertaken through the Public Sector Leaders Boards and Suffolk Chief Officers Leadership Team, with a Higher Level Steering Group set up to oversee the process and the Suffolk Gypsy and Traveller Accommodation Sub-Group assessing the sites.</p>	<p>The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2013) identifies a need for permanent and short stay sites in Ipswich, Suffolk Coastal, Waveney, Babergh and Mid-Suffolk.</p>	<p>Policy CS11 states that provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need.</p> <p>A Suffolk-wide consultation began in August 2014 which identified potential sites for short stay gypsy and traveller provision. However, the consultation was cancelled due to further sites being put forward. The process has been re-started with a call for sites consultation held between September and November 2015.</p>	<p>Three sites for short stay provision are to be identified through the current Suffolk-wide work with the aim of sites being operational by the end of 2016.</p> <p>The Ipswich Policy Area Board has agreed to engage with Suffolk wide work undertaken on Gypsy and Traveller provision (at IPA Board meeting in November 2013).</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<p>Employment needs: delivering economic growth in line with the New Anglia LEP</p>	<p>New Anglia Local Enterprise Partnership</p> <p>Ipswich Policy Area Board</p> <p>Suffolk Growth Group – including attendance by a representative of the Local Enterprise Partnership. Recent attendance also by University Campus Suffolk.</p> <p>Regular meetings of Economic Development portfolio holders of Suffolk local authorities.</p> <p>Employment Land Needs Assessment undertaken jointly with Babergh, Mid Suffolk, Suffolk Coastal and Suffolk County Council through a steering group involving planning and economic development officers.</p>	<p>New Anglia LEP Strategic Economic Plan</p> <p>New Anglia LEP Growth Deal</p> <p>Suffolk Growth Strategy (2013)</p> <p>IPA Board Functional Economic Geographies Paper (September 2014)</p> <p>Suffolk Haven Gateway Employment Land Review (2009)</p> <p>East of England Forecasting Model – Autumn 2012, 2013 and 2014</p> <p>Employment Land Needs Assessment for Ipswich, to be published (covering Ipswich, Babergh, Mid Suffolk and Suffolk Coastal economic area and Waveney economic area).</p>	<p>Policy CS13 sets the basis for allocation of land for employment uses. Approach aligns with broad areas for growth identified in the Suffolk Growth Strategy.</p> <p>A strategic employment site safeguarded through Core Strategy policy CS13. Employment land allocations amounting to 48.5ha made through the Site Allocations DPD policy SP5.</p> <p>Policy SP12 supports and facilitates the future development of University Campus Suffolk.</p> <p>Ipswich City Deal in place supporting apprenticeships and other training schemes.</p> <p>Regional Growth Fund contribution to the Ipswich Flood Defence Scheme (see below).</p> <p>Employment Land Needs Assessment to be published in January 2016.</p>	<p>Three areas have recently been awarded Enterprise Zone status in Ipswich as part of the New Anglia ‘Space to Innovate’ Enterprise Zone – Futura Park, Princes Street and the Island Site, with a further one identified at the former Sugar Beet Factory site in Sproughton, which is in Babergh District Council.</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<p>Transport Infrastructure: Addressing congestion within and around Ipswich</p>	<p>Discussions with Highways Agency</p> <p>Involvement in production of Local Transport Plan through consultations with Suffolk County Council.</p> <p>New Anglia Local Enterprise Partnership.</p>	<p>Suffolk Local Transport Plan 3 2011 – 2031 (Suffolk County Council, 2011)</p> <p>New Anglia Local Enterprise Partnership Growth Deal (2014)</p>	<p>Planned improvements to junctions on the A14.</p> <p>LTP3 identified ‘Ipswich - Transport Fit for the 21<sup>st</sup> Century’ as major scheme – Taken forward through Travel Ipswich which identifies measures to improve traffic management and promote alternatives to car travel. Many of these measures have now been implemented. Core Strategy encourages use of non-car modes of travel.</p> <p>New Anglia Growth Deal identifies ‘Ipswich Radial Corridor– Package of sustainable transport measures to improve traffic flows into Ipswich’ as a project for 2016/17 and beyond.</p>	<p>Involvement in future updates to the Local Transport Plan.</p> <p>Regular Joint Transport Portfolio Holders meeting between Ipswich Borough Council and Suffolk County Council.</p>
<p>Flood Risk: Addressing issues of flood risk, water supply and waste water.</p>	<p>Production of Water Cycle Study with Haven Gateway Partnership.</p> <p>Close working with the Environment Agency on the flood defence barrier.</p>	<p>Strategic Flood Risk Assessment (Ipswich Borough Council, 2011)</p> <p>Water Resources Management Plan 2015 (Anglian Water, September 2014)</p>	<p>The provision of a tidal surge barrier is a key objective of the Core Strategy and Policies DPD. The Environment Agency have awarded the contract for design and construction of the barrier and ancillary</p>	<p>Regular liaison with Suffolk County Council as Lead Local Flood Authority.</p> <p>The Council continues to keep Anglian Water informed of future local planning for Ipswich,</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
	<p>Involvement with Anglian Water and other local authorities in relation to the production of the Water Resources Management Plan.</p>	<p>Ipswich Flood Defence Management Strategy</p> <p>Sequential Test Statement and Exception Test Statement (Ipswich Borough Council, 2011)</p> <p>Sequential Test Statement and Exception Test Statement (Ipswich Borough Council, 2015)</p>	<p>works have begun in spring 2015. It is anticipated that the barrier will be completed by the end of 2017.</p> <p>Policy DM4 sets out the approach to flood risk and new development and is supported by the EA.</p> <p>Improvements have been carried out in relation to waste water treatment works at Cliff Quay.</p> <p>Water Resources Management Plan identifies measures to ensure that future water supply is able to meet demand created by levels of planned growth. Requirement for optional water standard under policy DM1 is consistent with the aim of reducing demand for water in the Water Resources Management Plan.</p> <p>Ipswich Development and Flood Risk Supplementary Planning Document (Ipswich Borough Council, update 2014).</p>	<p>particularly housing provision. Correspondence is also sent to Anglian Water in respect of all sites identified for development and their likely delivery to assist Anglian Water in their future forecasting.</p> <p>Future updates to Sequential Test Statement and Exception Test Statement.</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
Protection of Heritage Assets, given the significance of historic assets in the central part of Ipswich	Meeting with English Heritage (now Historic England) and Suffolk County Council in May 2014, focusing particularly on the prominence given to heritage in the DPDs.	-	<p>Increased prominence given to protection and enhancement of heritage assets in the Plan, including details of historic assets on the Site Sheets accompanying each site allocation.</p> <p>Production of Urban Character SPD. The first four parts of the Urban Character SPD (California, Norwich Road, Gipping &amp; Orwell Valley and Parks) were adopted by the Council in January 2015 and the fifth part relating to Chantry, Stoke Park and Maidenhall was adopted in November 2015.</p>	<p>Production / implementation of Urban Character Supplementary Planning Document (SPD).</p> <p>The Council also has ongoing discussions with Historic England.</p>
Addressing cumulative impacts on the Stour and Orwell Estuaries Special Protection Area from housing developments in Ipswich and surrounding Districts.	Discussions with Natural England and neighbouring authorities.	<p>Habitats Regulations Assessments for Suffolk Coastal Core Strategy and Development Management Policies DPD (2011).</p> <p>Habitats Regulations Assessment for Ipswich Proposed Submission Core Strategy and Policies</p>	<p>Management Plan for Orwell Country Park being produced reflecting the results of the 2015 Visitor Survey.</p> <p>New Country Park as part of the Ipswich Garden Suburb to reduce visitor pressure on the Special Protection Area.</p> <p>Identification of green</p>	Ongoing discussions with Natural England, neighbouring authorities and Suffolk county Council to agree an approach to delivering mitigation measures relating to monitoring and management of visitor usage at the SPAs, including how this is to be

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
		<p>DPD Review (2014).</p> <p>Orwell Country Park Visitors Survey (2015) to identify patterns of visitor use and recreational disturbance.</p>	<p>infrastructure opportunities, including the identification of possible suitable alternative accessible natural greenspaces, and mechanisms for delivering these through the update to the 2008 Haven Gateway Green Infrastructure Strategy (see below).</p>	<p>funded. A Memorandum of Understanding and work programme is being drawn up in relation to the production of a mitigation strategy.</p>
<p>Green Infrastructure provision, including the delivery of the 'Green Rim' around Ipswich Borough</p>	<p>The Council were involved in production of the 2008 Haven Gateway Green Infrastructure Study via the steering group.</p> <p>Update to 2008 Strategy for a 'wider' Ipswich Policy Area undertaken by the four Ipswich Policy Area planning authorities with involvement from stakeholders in 2015. These stakeholders include Natural England, Suffolk County Council, Environment Agency and Wild Anglia Local Nature Partnership.</p>	<p>Haven Gateway Green Infrastructure Study (2008)</p> <p>Haven Gateway Green Infrastructure Study – Ipswich Policy Area Update 2015.</p>	<p>Identification of Green Rim in policy CS16 informed by Haven Gateway Infrastructure Study (2008).</p> <p>Under the IPA Board work programme a 2015 update to the Haven Gateway Green Infrastructure Study identifies actions progressed since 2008 and those which remain relevant. This will inform locations for future growth</p>	<p>The 2015 update to the 2008 Haven Gateway Green Infrastructure Strategy will help to inform locations for further growth in the IPA.</p>



<b>Strategic Issue</b>	<b>Management and Working Arrangements</b>	<b>Evidence base</b>	<b>Outcome</b>	<b>Ongoing co-operation</b>
Co-operation with the Marine Management Organisation	Through consultations and a presentation was given by the MMO to IBC planning officers during 2015.	-	The plan contains reference to the Inshore Marine Special Protection Areas.	Future liaison with the MMO on the South East Inshore Marine Plan.

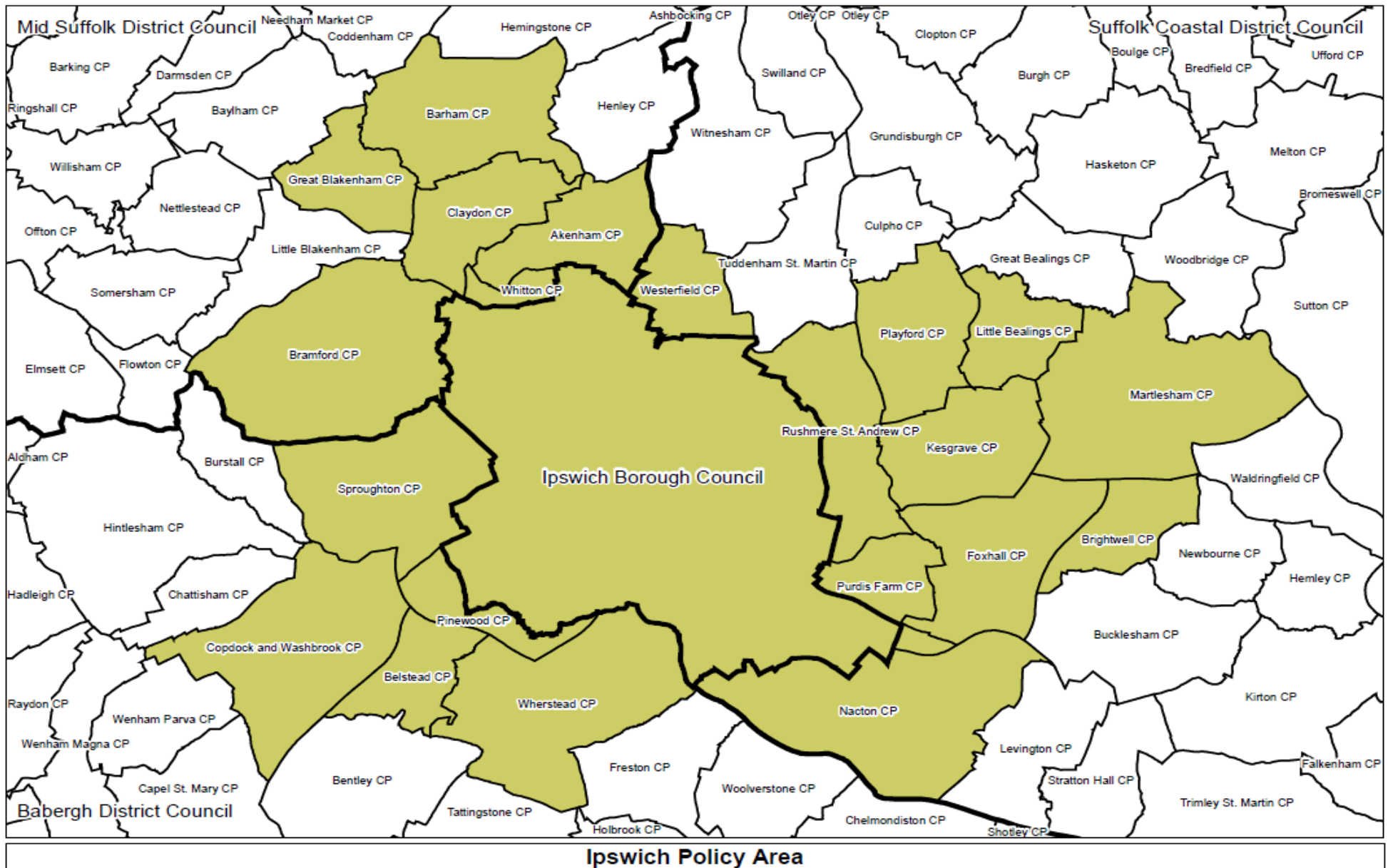
Table 2 - Site Allocations

The Council has also co-operated with adjoining authorities in relation to the allocation / development of sites on the periphery of Ipswich.

Site	Issue	Action / Outcome
<b>Sites within Ipswich Borough</b>		
Ipswich Garden Suburb (Policy CS10)	Large site for 3,500 dwellings, at northern edge of Ipswich adjoining the border with Suffolk Coastal District and close to the border with Mid Suffolk District.	The proposed Country Park acts as a buffer between the development and nearby Westerfield village which is in Suffolk Coastal District. The Country Park is also intended to mitigate impacts on European designated sites including those in Suffolk Coastal District.
Land north of Whitton Lane (IP140)	Employment allocation adjoining land in Mid Suffolk District Council area to the north of the site.	Options for development of land to the north of IP140 for employment uses or mixed development were identified in the Babergh District Council and Mid Suffolk District Council Local Plan: Strategic Site Allocations & Designations – Issues and Options Early Stage Consultation (Regulation 18) (January 2015).
Elton Park (IP059)	Land in Babergh District to the north, on the other side of the River Gipping, (the former sugar beet factory site) is identified as a strategic employment allocation in the Babergh Core Strategy, along with a requirement for proposals for the site to have regard to provision / upgrading of sustainable transport access between the site, nearby villages and Ipswich town centre as necessary.	The site sheet for the Elton Park allocation includes a requirement to ensure land is safeguarded to land a pedestrian and cycle bridge to the river path.
Employment allocations at Ransomes Europark (IP146)	The proposed allocations at Ransomes Europark form the easternmost boundary of Ipswich Borough. Any further extension of the Ransomes Europark eastwards would need to be within Suffolk Coastal District.	Land to the east of Ransomes Europark is allocated as a General Employment Area in the 2001 Suffolk Coastal Local Plan (through saved policy AP215). Policy AP215 acknowledges that this land will need to be accessed through the existing Ransomes Europark in Ipswich Borough.  Policy SP5 of the Suffolk Coastal Core Strategy (2013)

		states that the Council will support the retention, expansion and consolidation of the area to the east of the existing Ransomes Europark as part of a wider employment corridor extending into Ipswich Borough.
<b>Sites outside Ipswich Borough</b>		
Allocation for mixed use development at Babergh Ipswich fringe (Babergh District Council)	The site is close to the southwest edge of the built up area of Ipswich but outside of Ipswich Borough.	Allocation of land for housing and employment development within the Babergh Core Strategy (2013). Ipswich Borough Council supports the principle of a mix of employment and residential uses on this site.
Planning permission for housing development at Trinity Park (Suffolk Coastal District)	The site adjoins housing development at Warren Heath which forms part of the wider built up area of Ipswich although is outside of Ipswich Borough.	Outline planning permission was granted for 300 dwellings at Trinity Park in December 2013. Comments submitted by Ipswich Borough Council stated that the Council supports the principle of residential development on the site.

## Appendix 1



## **Appendices 2 and 3**

### **Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area - Draft**

This Memorandum of Understanding has been prepared in order to address the requirements of the Localism Act 2011, section 110, 'Duty to co-operate in relation to planning of sustainable development'.

Ipswich Borough Council's administrative boundary is tightly drawn than the actual Housing Market Area and Functional Economic Area and, therefore, there is a need to work jointly with neighbouring areas to ensure that future needs for development and infrastructure are met. The Duty to Co-operate Statement prepared to accompany the submission draft Core Strategy Review (December 2014 and updated September 2015) describes how strategic cross-boundary issues are being jointly addressed. It builds on long-established joint working between the authorities.

The Memorandum of Understanding establishes a framework for co-operation between Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council in relation to the delivery of housing across the Housing Market Area and employment growth across the functional economic area.

#### **Parties to the Memorandum of Understanding**

The Memorandum of Understanding is an agreement between the following parties:

- Babergh District Council
- Ipswich Borough Council
- Mid Suffolk District Council
- Suffolk Coastal District Council and
- Suffolk County Council.

#### **Scope of the Memorandum of Understanding**

The Memorandum of Understanding commits the parties to the following actions:

1. To agree objectively assessed housing need for the Ipswich Housing Market Area, which consists of the local authority areas of Ipswich Borough, Suffolk Coastal, Babergh and Mid Suffolk District Councils;
2. To agree objectively assessed employment need for the Ipswich Functional Economic Area, which also consists of the local authority areas of Ipswich Borough, Suffolk Coastal, Babergh and Mid Suffolk District Councils;
3. To identify broad locations to accommodate forecast growth;
4. To ensure the implementation of any mitigation measures required as a result of Habitats Regulations Assessment; and
5. To identify and prioritise infrastructure delivery across the four local authority areas.

In relation to mechanisms, the Memorandum of Understanding also commits the parties to the following actions:

6. To review and agree the Ipswich Policy Area boundary in early 2016; and
7. To agree the form of the future joint or aligned plan(s).

Specifically in relation to point 1 above, the Proposed Submission Ipswich Borough Council Core Strategy and Policies Development Plan Document Review November 2014, as updated September 2015, identifies objectively assessed housing need for Ipswich Borough of 13,550 dwellings 2011-2031 (through Policy CS7 The Amount of Housing Required). This figure needs to be considered in the context of the objectively assessed housing need for the Ipswich Housing Market Area, identified in 2013 as 34,250.

Of the total requirement for Ipswich Borough of 13,550 dwellings 2011-2031, land for the delivery of 5,578 dwellings remains to be identified. It is expected that some of these will be delivered on windfall sites within Ipswich Borough, but some will need to be planned through joint work with neighbouring local authorities.

Objectively assessed need for housing is updated periodically and therefore the figure to be planned for is likely to change in the future.

#### **Timetable for the joint work**

Ipswich Borough Council and Suffolk Coastal District Council have set out the following timetable through their current 'in effect' local development schemes. Babergh and Mid Suffolk District Councils are scheduled to approve the same timetable through a revised local development scheme.

<i>Notify stakeholders &amp; invite representations</i>	Oct 2016-Jun 2018
<i>Publish draft proposed submission plan for inspection &amp; invite representations</i>	Sept-Oct 2018
<i>Submit plan &amp; submission documents to Secretary of State</i>	Feb 2019
<i>Independent examination hearings</i>	Jun 2019
<i>Receive &amp; publish Inspector's recommendations</i>	Oct 2019
<i>Adopt the plan</i>	Nov-Dec 2019

#### **Mechanism for the Joint Work**

The parties already have a forum for joint working through the Ipswich Policy Area (IPA) Board. Its terms of reference are attached at Appendix 1.

The joint work will take the form of a joint or aligned plan review. It is yet to be determined whether the plan review will be a single document approved either by a formally-constituted joint body or by each respective council, or aligned local plans for each of the local planning authorities.

The IPA Board will provide the mechanism for joint working in the short to medium term. The earliest work that the IPA Board will undertake prior to April 2016 will be to review the IPA boundary

and agree the form of the joint plan. In doing so, it will have regard to any strategic planning work which may be looking at different geographies, including Suffolk-wide.

The IPA does not have decision-making powers and therefore the parties will agree outcomes through each Council's existing decision-making structures, in accordance with their constitutions.

### **Roles and responsibilities**

The planning policy services of Ipswich Borough Council, Suffolk Coastal District Council, Mid Suffolk District Council and Babergh District Council will lead the preparation of the work, with support from Suffolk County Council. Alternatively, a joint strategic planning team drawing staff from the constituent local authorities will be set up. The IPA Board terms of reference already sets out roles and responsibilities in relation to that body.

### **Limitations**

This Memorandum of Understanding does not alter the fact that Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council remain the local planning authorities for their respective areas. The key objective of this Memorandum of Understanding is to ensure that strategic policies are consistent across the local authorities. In addition, each local authority will have non-strategic, locally-specific policies covering a range of topic areas, which will need to be considered and included in appropriate documents.

### **SIGNATURES**

Signature: Date

Signed on behalf of Babergh District Council

Signature: Date

Signed on behalf of Ipswich Borough Council

Signature: Date

Signed on behalf of Mid Suffolk District Council

Signature: Date

Signed on behalf of Suffolk Coastal District Council

Signature: Date

Signed on behalf of Suffolk County Council

## Appendix 1 – Terms of reference of the Ipswich Policy Area Board

### **Revised Terms of Reference, October 2015**

- To provide a forum in which the five local authorities can work together to develop, promote and deliver their vision for the Ipswich Policy Area as a major economic growth area within the Greater Ipswich sub region, County of Suffolk and New Anglia Local Enterprise Partnership.
- To enable them to co-operate as local planning authorities on the preparation and monitoring of their Local Plans and share relevant evidence and intelligence.
- To provide a mechanism to ensure that all partners and stakeholders work together to deliver the housing and employment growth requirements for the Ipswich Policy Area and coordinate the delivery of the necessary infrastructure – including transport, education, skills, power, green infrastructure, flood and coastal defences.

### **Constitution**

The Board will consist of one Councillor and one Officer from the following authorities:

Ipswich Borough Council  
Suffolk Coastal District Council  
Mid Suffolk District Council  
Babergh District Council  
Suffolk County Council

Each authority will nominate its representatives to the Board.

Ipswich Borough Council will provide the Secretariat to the Board, including Minutes of all meetings and processing all Freedom of Information requests.

The Board will be chaired by Suffolk County Council until March 2017.

The Board will meet every two months but additional meetings may be called if required.

Sub-groups may be established by agreement. Other organisations may be co-opted onto sub-groups or invited to attend meetings.