

# Ipswich Borough Council Local Plan

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

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## 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.

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;
- provision for Gypsies and Travellers;
- facilitating the jobs needed;
- transport infrastructure;
- addressing flood risk;
- protection of heritage assets;
- addressing cumulative impacts on Special Protection Area;
- identification of green rim;
- site allocations in peripheral parts of the Borough.

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 (NPPG) 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 2.

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 state 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 Haven Gateway 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 etc.

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 and 7<sup>th</sup> November 2014. Action notes from each meeting are available to view at <https://www.ipswich.gov.uk/content/ipswich-policy-area>.

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 endorses this duty to co-operate statement.

#### 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 in the region of 12,500 jobs 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 Executives Group

Suffolk Chief Executives Group 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. 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
- 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 (draft development plan documents)

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. 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.

#### 6. 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)
- Suffolk Housing Survey (to be published, being 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

#### 7. 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.</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>In this respect Babergh and Mid-Suffolk District Councils have agreed to the principle of policy work which addresses growth needed in the Ipswich Policy Area as a result of ‘possible Ipswich overspill’ through the outline future policy work programme agreed via their Strategy Committee in April 2014.</p>	<p>The planning authorities in the Ipswich Housing Market Area are to produce a Joint Topic Paper on addressing housing need across the HMA which will form the basis of an agreement towards more formal joint working to meet Ipswich’s residual need. This will be agreed via the Ipswich Policy Area Board and via Member agreement through individual Council processes if considered to be necessary.</p> <p>Suffolk Growth Group has identified five areas for future work including identification of measures to bring forward housing development and joint strategic planning. This to be presented to Suffolk Chief Executives Group.</p> <p>Transformation Challenge Award bid submitted to DCLG by Suffolk Public Sector Leaders Group, with</p>

				<p>a specific outcome of accelerating and increasing the number of new homes and new jobs created in our communities.</p> <p>Local Enterprise Partnership now having a greater focus on housing delivery.</p> <p>Joint Topic Paper to be produced through IPA Board.</p>
<p>Gypsy and Traveller accommodation: Identification of permanent and short stay sites across Suffolk.</p>	<p>The Suffolk Gypsy and Traveller Forum is an officer group representing the district and borough councils and Suffolk County Council, including the Gypsy and Traveller Liaison Officer. The role of the group is largely an information sharing group, although sub-groups are set up in relation to specific tasks.</p> <p>Suffolk Chief Executives Group – discussed the need for consultation on short stay sites.</p> <p>Suffolk Public Sector Leaders Group –</p>	<p>The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2013) identifies a need for pitches 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.</p>	<p>The Suffolk Gypsy and Traveller Forum to consider how to meet need across Suffolk.</p> <p>The Ipswich Policy Area Board has agreed to engage with the work of the Gypsy and Traveller Forum in terms of making recommendations to the Forum.</p>

	<p>supported setting up of project team to address need for short stay pitches.</p> <p>Meetings were held with planning officers in adjoining authorities during May and June 2014.</p>			
<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>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>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</p>	<p>Through the Ipswich Policy Area, it has been agreed to undertake further work on an employment needs assessment for Ipswich, Babergh, Mid Suffolk and Suffolk Coastal.</p> <p>Transformation Challenge Award bid submitted to DCLG by Suffolk Public Sector Leaders Group, with a specific outcome of accelerating and increasing the number of new homes and new jobs created in our communities.</p> <p>Suffolk Growth Group has identified five areas for future work including around skills and inward investment, with a focus on bringing sites forward. This to be presented to Suffolk</p>

			contribution to the Ipswich Flood Defence Scheme (see below).	Chief Executives Group to secure ownership.  Joint Topic Paper to be produced through IPA Board.
Transport Infrastructure: Addressing congestion within and around Ipswich	Discussions with Highways Agency  Involvement in production of Local Transport Plan through consultations with Suffolk County Council.  Local Enterprise Partnership.	Suffolk Local Transport Plan 3 2011 – 2031 (Suffolk County Council, 2011)  New Anglia Local Enterprise Partnership Growth Deal (2014)	Planned improvements to junctions on the A14.  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. Core Strategy encourages use of non-car modes of travel.  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.	Involvement in future updates to the Local Transport Plan.  Regular Joint Transport Portfolio Holders meeting between Ipswich Borough Council and Suffolk County Council.

<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>Involvement with Anglian Water and other local authorities in relation to the production of the Water Resources Management Plan.</p>	<p>Strategic Flood Risk Assessment (Ipswich Borough Council, 2011)</p> <p>Water Resources Management Plan 2015 (Anglian Water, September 2014)</p> <p>Ipswich Flood Defence Management Strategy</p> <p>Sequential Test Statement and Exception Test Statement (Ipswich Borough Council, 2011)</p>	<p>The provision of a tidal surge barrier is a key objective of the Core Strategy and Policies DPD.</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.</p> <p>Ipswich Development and Flood Risk Supplementary Planning Document (Ipswich Borough Council, update 2014).</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, 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>
<p>Protection of Heritage Assets, given the significance of historic assets in the central part of Ipswich</p>	<p>Meeting with English Heritage and Suffolk County Council in May 2014, focusing particularly on the prominence given to heritage in the DPDs.</p>	<p>-</p>	<p>Increased prominence given to protection and enhancement of heritage assets in the Plan.</p> <p>Production of emerging Urban Character SPD.</p>	<p>Production / implementation of Urban Character Supplementary Planning Document (SPD).</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.	Habitats Regulations Assessments for Suffolk Coastal Core Strategy and Development Management Policies DPD (2011).  Habitats Regulations Assessment for Ipswich Draft Core Strategy and Policies DPD Focused Review (2014).	Identification of measures at Orwell Country Park and new Country Park as part of the Ipswich Garden Suburb to reduce visitor pressure on the Special Protection Area.	Further visitor survey work to be undertaken in relation to the proposed measures at Orwell Country Park.
Green Infrastructure provision, specifically the identification of the 'Green Rim' around Ipswich Borough	Involvement in steering group for production of Haven Gateway Green Infrastructure Study	Haven Gateway Green Infrastructure Study (2008)	Identification of Green Rim informed by Haven Gateway Infrastructure Study (2008)	Ongoing discussions with neighbouring authorities.

### Site Allocations

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

- Ipswich Garden Suburb.
- Land north of Whitton Lane (IP140) – to consider how development of this site relates to development to the north in Mid-Suffolk District.
- Elton Park (IP059) – to consider a proposed pedestrian and cycle bridge which would link the site with the former Sugar Beet Factory in Babergh District to the north of the site.
- Employment allocations at Ransomes Europark – to consider how development of this site would relate to potential development of the adjoining land in Suffolk Coastal District.
- Allocation for mixed use development at Babergh Ipswich Fringe.
- Housing development at Trinity Park in Suffolk Coastal District.