

Final Draft Ipswich Local Plan Review

Ipswich Borough Council Statement to Accompany the Ipswich Borough Council and Babergh and Mid Suffolk District Councils - Draft Statement of Common Ground

June 2020



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Explanatory Note

- 1.1 As recognised stakeholders, Babergh and Mid Suffolk Councils have been formally consulted at every stage of consultation on the emerging Ipswich Local Plan Review. In addition, all three Councils subject to this draft Statement of Common Ground are Ipswich Strategic Planning Authorities and work together on cross-boundary issues supporting the ISPA Board.
- 1.2 The first draft Statement of Common Ground between Babergh and Mid Suffolk and Ipswich Borough Council was prepared only very recently and has only been subject to one informal contact discussion between officers. It is therefore very early days in the process.
- 1.3 The objective of this the Statement of Common Ground is to seek to find common ground on matters raised through representations to the Regulation 19 Ipswich Final Draft Local Plan with Babergh and Mid Suffolk Councils.
- 1.4 Ipswich Borough Council has put forward their suggested position at this time and both parties have agreed to work together to progress the draft Statement of Common Ground. This is likely to be amended in due course as the Councils work together to resolve issues.
- 1.5 The signed version will be submitted as soon as it becomes available. In the interim, Ipswich Borough Council is submitting an early draft version of the Statement of Common Ground which represents the Council's understanding of the issues raised by Babergh and Mid Suffolk Councils.

**Statement of Common Ground between
Ipswich Borough Council as Local Planning Authority
and
Babergh and Mid Suffolk District Councils**

Xx June 2020

Scope

1. The scope of this Statement of Common Ground is to ensure full alignment of the Final Draft Ipswich Local Plan policy CS11 Gypsy and Traveller Accommodation with the ISPA Statement of Common Ground Version 6 (June 2020). This Statement of Common Ground (SoCG) is designed to suggest changes to policy to ensure compliance but also provides explanation of how the Council is seeking to fulfil its 2011 'public duty' in terms of equality and diversity regarding meeting the accommodation needs of travellers and gypsies within Ipswich.
2. In addition, other issues are addressed regarding:
 - Policy CS2 - The Location and Nature of Development;
 - Policy CS7 and accompanying text; and
 - Relevant lower-case supporting text of relevance to the main issues raised as per the Babergh and Mid Suffolk District Council representation.

Objectives

3. The objective of this Statement of Common Ground is to secure agreement between the parties that the approach being taken by Ipswich Borough Council is indeed 'sound' and that the changes suggested to policy are indeed compliant with the approach outlined in the ISPA SoCG.
4. This SoCG seeks to find common ground on matters raised through representations to the regulation 19 Ipswich Final Draft Local Plan from Babergh and Mid Suffolk District Councils.

Background to addressing the Needs of Gypsies and Travellers

5. In the context of current plan-making, the ISPA authorities commissioned a joint study to identify the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney which was published in 2017.
6. The needs identified for Ipswich are identified overleaf as an extract from the study. As can be seen from the Table overleaf, the evidence shows that 27 pitches will be required in Ipswich by 2036. Currently Ipswich Borough have pitch provision of 39 permanent pitches with 5 vacant pitches which means there are 44 permanent

pitches within the Borough. The five-year supply required is 13 pitches which is an annualised basis of 3 pitches.

7. It is clear, that whilst the small family pitch site at Henniker Road is well integrated with the settled community, the majority of the pitch provision in the Borough has been at West Meadow. This is a large site and over the years has been subject to police intervention. The anecdotal picture in the Assessment indicates that for families, this large site may be unsuitable and that provision of smaller sites catering for 3 or 4 families is more likely to lead to more successful provision and also given the example of Henniker Road, are more likely to successfully assimilate with the settled community.
8. The 2017 Assessment involved extensive face to face surveys with Gypsies, Travellers and Travelling Showpeople covering a range of issues related to accommodation and service needs¹Involving over 100 surveys.

ANA 2017

Ipswich (Gypsy and Traveller Pitches)

Table A.3: Five year estimate of the need for permanent/residential site pitches (2016-2021)	
1) Current occupied permanent / residential site pitches	39
<i>Current residential supply</i>	
2) Number of unused residential pitches available	5
3) Number of existing pitches expected to become vacant through mortality 2016-2021	1
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	2
6) Residential pitches planned to be built or to be brought back into use 2016-2021	0
7) Less pitches with temporary planning permission	0
Total Supply	8
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2016-2021, excluding those already counted as moving due to overcrowding in step 12	7
9) Family units on unauthorised encampments requiring residential pitches in the area	0
10) Family units on unauthorised developments requiring residential pitches in the area	0
11) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	1
12) New family units expected to arrive from elsewhere	0
13) New family formations expected to arise from within existing family units on sites	9
Total Need	17
<i>Current residential need: Housing</i>	
14) Family units in housing but with a psychological aversion to housed accommodation	4
Total Need	21
<i>Balance of Need and Supply</i>	
Total Need	21
Less total supply	8
Total Additional Pitch Requirement	13
Annualised Additional Pitch Requirement	3

Source: ANA 2017

¹ANA 2017 para.S5 and S14 – CONCLUSION IN THE Executive Summary and in the main report. S17

	Base Numbers	Additional need 2016-2021	Additional need 2021-2026	Additional need 2026-2031	Additional need 2031-2036	Additional need 2016-2036	Numbers as at 2036
Residential pitches	44	13	4	5	5	27	71

Source: ANA 2017

There are 39 occupied pitches and 5 vacant, which equals planning permission for 44.

- The ANA states:

‘.....it was generally acknowledged that there is a lack of permanent accommodation provision throughout the study area and surrounding areas. Much of the accommodation need is due to growing families on existing pitches leading to overcrowding. It was considered that there is a need to ensure that accommodation provision is situated close to services and facilities. Stakeholders recognised that cultural identity and lifestyles of different groups may impact on the type of accommodation required.’ And

.....The main issues stated by families were that some sites are too large, there is a lack of transit provision, and there is a need for more sites. According to respondents, small family sites appear to work well avoiding conflict that can arise on larger sites with many different family groups.² ‘..... Families spoke of how small family sites work better and these are the type of sites families primarily want. They spoke of how they feel safer on smaller sites, and how they are easier to manage and maintain. They also commented on how smaller sites are more accepted by the local settled community...’

9. In terms of the large Ipswich site at West Meadow consultation revealed in the ANA that:

‘The large local authority adjoining sites in Ipswich which contain 42 pitches was cited as one where there have been management issues due to its size. Stakeholders suggested that the site is at least twice the size of a manageable site. It is occupied by families who do not always get on but remain due to a lack of authorised accommodation elsewhere. Since the consultations, there have been incidents on both sites. It was suggested that ideally, local authorities should assist in the provision of both privately owned and publicly owned sites, and not build sites that are too big to manage or maintain.’³

10. The Council therefore has a dual approach to meeting need. On one hand, the Council’s approach is led through the development management process for small

² ANA 2017 S20

³ ANA 2017 para 4.9

sites catering for around 3-4 families. This is to better reflect the anecdotal evidence received by the consultants who prepared the ANA. There is a precedent for such an approach which reflects the Waveney Local Plan (2019) approach. This is being supported through a bespoke piece of work which looks at developing these needs further which is in the process of being commissioned through the same consultants who provided the 2017 ANA.

11. In terms of planned provision, this is being co-ordinated through the county-wide Higher-Level Steering Group. In 2019 the group split into two, with the Norfolk and Suffolk Gypsy, Roma and Traveller Forum providing an operational focus and a Steering Group meeting every six months to provide a strategic direction. The focus of this group is the provision of transit pitches. IBC has agreed rewording of the transit references to comply with the higher-level approach that all Suffolk authorities have signed up to, in reference to the Regulation 19 Ipswich Local Plan.
12. In addition, there is a member of staff who sits two days a week in East Suffolk Council offices who is employed by the ISPA authorities jointly to progress this (from 2019). This is through individual Councils' Housing functions.
13. The Policy CS11 is located in the Core Strategy and Policies Development Plan Document as a strategic policy, in recognition that like housing for settled people, this is an important objective. However, the criteria are more related to development management. In addition, the reference to working with other authorities is something of a misnomer from the previous Plans. The ISPA considers and outlines a procedure for where any form of housing cannot be met within the boundary of a given authority and therefore reference to this in the policy CS11 is inappropriate.
14. It is proposed to maintain a strategic focus within it but better clarify the position.
15. Should sites not come forward within 5 years of adoption, it is anticipated that the Borough will undertake a focussed review to identify smaller sites which can be incorporated into a new local plan.

Policy CS2 The Location and Nature of Development

16. Babergh and Mid Suffolk District Councils have submitted a representation in relation to policy CS2 The Location and Nature of Development and paragraph 8.58 of the explanatory text. This has been carried forward in error from the adopted Local Plan. It is agreed that it could be confusing in relation to the ISPA Statement of Common Ground Version 6 June 2020 and, therefore, revised wording is proposed to address it. However, reference to cross boundary working needs to be retained: both in relation to cross-boundary sites such as at Humber Doucy Lane (policy ISPA4) and to recognise the relationship between the ISPA Local Plans; and that allows for the management of risks associated with the possible loss of existing sites through examination which would mean we may have to look again at cross-boundary sites. Ipswich Borough Council's response is to try to resolve objections made by Babergh and Mid Suffolk District Councils as outlined in the Table overleaf. This also includes

consideration of Babergh and Mid Suffolk District Council's objection to CS11. There is a column in the table overleaf for comments to be made by Babergh and Mid Suffolk District Councils.

17. Changes are shown in bold, new words are underlined and struck out words are shown as strike throughs.

DRAFT

Table 1 : Babergh and Mid Suffolk District Council Objections, Regulation 19

Rep. ID No.	Policy/Chapter	Representation by Babergh and Mid Suffolk District Councils	Change proposed by Ipswich Borough Council	Babergh and Mid Suffolk Council Response to Proposed Change
26450	Policy CS2 The Location and Nature of Development	<p>Before an assumption is made that later in the plan period, housing supply opportunities in Ipswich Borough will be limited, a comprehensive regeneration and asset strategy needs to be undertaken to exhaust all other options. Through measures contained in the Local Transport Plan and the SCC Transport Mitigation Strategy, it should be possible to rationalise /make better use of the amount of car parking required in Ipswich. We would have expected the parking strategy to have been produced before the assertion was made in paragraph 8.58 of the limited housing supply opportunities.</p>	<p>The Council has thoroughly reviewed the development potential within the Borough boundary through an updated Strategic Housing and Employment Land Availability Assessment (SHELAA) January 2020. Policy CS7 sets out the Borough’s housing requirement. The Council has set out a strategy to meet the requirement through a combination of strategic and more local allocations. Part of the Council’s ability to meet this requirement depends on development coming forward on land at the northern end of Humber Doucy Lane which straddles the boundary with East Suffolk and is addressed through policy ISPA4.</p> <p>Babergh and Mid Suffolk District Councils have submitted a representation in relation to policy CS2 The Location and Nature of Development and paragraph 8.58 of the explanatory text. This has been carried forward in error from the adopted Local Plan. It is agreed that it could be confusing in relation to</p>	

			<p>the ISPA Statement of Common Ground Version 6 June 2020 and, therefore, revised wording is proposed to address it. However, reference to cross boundary working needs to be retained, both in relation to cross-boundary sites such as at Humber Doucy Lane (policy ISPA4) and to recognise the relationship between the ISPA Local Plans and that allows for the management of risks associated with the possible loss of existing sites through examination which would mean we may have to look again at cross-boundary sites.</p> <p>We propose that Paragraph 8.58 is revised as follows:</p> <p>‘Later in the plan period after 2031, the Council’s housing land supply opportunities within the Borough boundary become more limited and ,therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough’s housing requirement as identified through objectively</p>	
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			<p>assessed housing need. The Council has set out a strategy to meet the requirement through a combination of strategic and more local allocations. In addition, it has thoroughly reviewed the development potential within the Borough boundary through an updated Strategic Housing and Employment Land Availability Assessment (SHELAA) published in January 2020. Part of the Council's ability to meet this requirement depends on development coming forward at the boundary with neighbouring districts, as addressed through policy ISPA4. '</p>	
26454	Policy CS11 and Paragraph 8.141	<p>Object to the wording in Paragraph 8.41 and Policy CS11. Whilst work is being undertaken with neighbouring authorities on short-stay provision with the Ipswich Strategic Planning Area as part of wider work in Suffolk, no contact has been made with Babergh and Mid Suffolk District Councils regarding permanent provision. It is identified that IBC need to find 27 permanent pitches to 2036.</p>	<p>As referred to earlier in this statement it is accepted that the wording of CS11 is not fully in compliance with the ISPA Statement of Common Ground as drafted which in part is due to administrative error but requires amendment.</p> <p>The Council's approach therefore is an approach that is led through the development management process for small sites catering for a small number of families. This is to better reflect the anecdotal evidence</p>	

			<p>received by the consultants who prepared the ANA.</p> <p>As drafted, it is accepted that CS11 is confusing. It is proposed to amend it as follows to ensure it has a better strategic focus:</p> <p>POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION</p> <p>Provision will be found within the Ipswich Borough where possible for additional permanent pitches to meet the need for 27 permanent pitches to 2036, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment 2017. Where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.</p> <p>It is anticipated that provision for smaller sites for family groups (which better meet the identified needs of gypsies and the travelling community). This will ensure greater social cohesion with the settled community and this is the preferred option. It is anticipated that this will be delivered through</p>	
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			<p>normal development management functions.</p> <p>The Council's identified need is for 27 permanent pitches between 2016-2036. The 5-year supply is for 13 permanent pitches which annually requires, 3 pitches a year. If progress does not move forward, the Council will conduct a focussed review within 5 years and the results of this would feed into the next local plan as positive allocations.</p> <p>Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.</p> <p>Applications for the provision of permanent pitches will be considered against the following criteria:</p> <ul style="list-style-type: none"> a. The existing level of local provision and need for sites; b. The availability (or lack) of alternative accommodation for the applicants; and c. Other personal circumstances of the applicant, including the proposed <p>occupants must meet the definition of Gypsy or Traveller.</p>	
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			<p>Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.</p> <p>d. The site should be located:</p> <ul style="list-style-type: none"> i. where it would be well served by the road network; and ii. where it would be well related to basic services including the public transport network. <p>e. The site should be:</p> <ul style="list-style-type: none"> i. accessible safely on foot, by cycle and by vehicle; ii. free from flood risk and significant contamination; iii. safe and free from pollution; 81 iv. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities; v. proportionate in size to any nearby settlements, to support community cohesion; and vi. where possible, located on previously developed land. <p>f. The site should not have a significant adverse impact on:</p> <ul style="list-style-type: none"> i. the residential amenity of immediate or close neighbours; 	
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			<p>ii. the appearance and character of the open countryside; iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities; iv. heritage assets including their setting; and v. the physical and social infrastructure of local settlements. Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.</p> <p>The Council will work with Suffolk County Council and neighbouring other local authorities in Suffolk to deliver identified needs for short stay stopping sites within Suffolk. develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.</p> <p>It is proposed to delete paragraph 8.1.4.1 because the contents do not comply with the procedure set out in the ISPA SoCG . This anticipates provision being within IBC Borough Boundary and if there are difficulties in meeting needs, the ISPA SoCG</p>	
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			<p>anticipates an in-house focused review and the results of this are to be reported through the Board. As drafted this does not contribute positively to the final draft Local Plan or comply with ISPA SoCG. This states that each local planning authority will meet its own need for permanent pitches for Gypsies and Travellers. The changes suggested support this approach and acknowledges the Borough Council looking to identify sites in the Borough to meet the Borough need. The ISPA Statement of Common Ground states that each local planning authority will meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. The SoCG goes on to state that where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. The</p>	
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			<p>amendments proposed to Policy CS11 also incorporate provision of a comprehensive focussed review where the development management approach fails to provide sufficient permanent pitches.</p>	
	<p>Core Strategy Policy CS7, The Amount of New Housing Required</p>	<p>Object to soundness of the Local Plan.</p> <p>Policy CS7 states 'In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 dwellings. This excludes the Opportunity Sites identified through policy SM.'</p> <p>This statement contradicts the text in paragraph 8.58:</p> <p>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out</p>	<p>From our discussion, it is CS7a) which appears to be the main issue because as drafted it does not comply with the ISPA approach outlined in Iteration 6, Statement of Common Ground.</p> <p>It is therefore proposed to amend CS7 a) to read: The Council has a housing requirement of at least 8,010 dwellings for the period 2018 – 2036. This equates to an annual average of at least 445 dwellings.</p> <p>The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area.</p> <p>See above elsewhere in this statement regarding proposed changes to 8.58</p>	

		<p>the Borough's objectively assessed housing need.'</p> <p>Policy CS7 also states following identification of the housing requirement that 'The Council will, with Its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area'. Whilst it is correct the Ipswich Housing Market Area authorities discuss the housing requirement for each local planning authority in the IHMA through the ISPA Board, before considering any implications for not being able to meet need, the text in paragraph C3 of the [SPA Statement of Common Ground Version 5 (October 2019 — signed January 2020) needs to be adhered to. The text is quoted below:</p> <p>Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where,</p>		
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		<p>through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken'.</p> <p>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans In the ISPA.'</p> <p>Again, this is fine for the earlier planning stages but not for the final draft as I explained earlier in our meeting as this is too late in the planning process and doesn't comply with the agreed procedure, in Iteration 6 of the ISPA SoCG .everything else is fine, its just this reference</p>		
	<p>Paragraph 8.109</p>		<p>Paragraph 8.109 be amended to avoid potential contradiction to read: Due to the constrained nature</p>	

			<p>of the Borough boundary, the Council has a limited capacity for future development. The Council is actively working to deliver with neighbouring authorities to its own contribution of the identified housing need within the Borough across the Ipswich Housing Market Area through and prepare aligned Local Plans to deliver it. The Council considers that the Ipswich housing need identified above can be met. Housing delivery will be closely monitored across the Ipswich Strategic Planning Area. Ipswich Borough Council has published a Housing Delivery Action Plan to support delivery within the Borough.'</p>	
	Core Strategy, paragraph 8.240	<p>Object to soundness of the Local Plan</p> <p>In respect of a 'Transport Mitigation Strategy' for the Ipswich Strategic Planning Area, this paragraph states: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board'.</p>	<p>Amend paragraph 8.240 to read as requested: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board and be agreed by each respective local planning authority.'</p>	

		Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'		
	Core Strategy, paragraph 8.249	<p>Object to soundness of the Local Plan</p> <p>Object to reference to an Ipswich Northern Route as this is no longer supported by Babergh or Mid Suffolk District Councils. However, appreciate that the decision by Suffolk County Council to not pursue funding for an Ipswich Northern Route was made after the emerging Ipswich Local Plan was published for consultation.</p>	<p>This alternative capacity requires addressing the issue of: the successful regeneration of the Island Site at Ipswich Waterfront which will require an additional crossing of the River Orwell. Whilst the delivery of a single span main bridge, which would have provided additional highway capacity, cannot now proceed, the County Council will contribute a maximum of £10.8m to help to deliver crossings to serve the Waterfront and deliver on Ipswich Local Plan regeneration objectives. Could also be provided via a northern bypass or a link road to the north of the town. The Council supports the work of key partners to investigate the possibility of a northern bypass, to address the issue of:</p> <ul style="list-style-type: none"> i. central east-west movement; ii. movements within and around the north of Ipswich; and iii. the capacity of the A14, particularly around the Orwell Bridge. 	

	Core Strategy, paragraph 8.250	Ditto – as above	<p>The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated. It is recognised that any such route would be within the East Suffolk Council and Mid Suffolk District Council areas (i.e. not between the Ipswich Garden Suburb – policy CS10 – and Westerfield village) and therefore it is not practical to include such a route within this Strategy. However, the Council will encourage those authorities, together with Suffolk</p> <p>106</p> <p>County Council and other interested parties, to actively investigate such a route, and would be prepared to contribute to any such investigation. Public consultation into possible routes for such a road has taken place.</p>	
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