

# Ipswich Borough Council Local Plan

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

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## 1. Introduction

The Duty to Co-operate (the duty) was introduced through Section 110 of the Localism Act 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 2019 states that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Cooperation is ongoing and statements will be updated as necessary. This is integral to the production of a positively prepared and justified strategy. These strategic priorities of relevance for Ipswich 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 East Suffolk ;
- 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 26, 35 and 120 advises that local plans should be positively prepared and be able to meet unmet development need from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development. 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) provides further guidance on undertaking the duty, which requires a proactive, ongoing and focused approach to strategic planning and partnership working. This has recently been updated in July 2019 and incorporated previous local plan guidance into a single planning practice document. It should be noted that this does not supersede the regulations on plan making.

## 2. Context

Ipswich is the county town of Suffolk. The Borough has relatively tight administrative boundaries and adjoins Babergh, Mid Suffolk and East Suffolk District Councils.

Suffolk is a two-tier area, with Suffolk County Council providing upper-tier services. The A12, A14 and rail links form strategic connections between Ipswich and adjoining authorities and beyond.

At the Suffolk County level, all local authorities have adopted a collaborative approach to deliver growth, particularly through the New Anglia LEP's Norfolk and Suffolk Economic Strategy and Growth Deal and the Greater Ipswich City Deal. The Suffolk Growth Programme Board was established to oversee and coordinate the growth opportunities in the County and played a key role in the preparation of the Suffolk Growth Strategy.

The Growth Programme Board is chaired by Stephen Baker, Chief Executive of the East Suffolk Councils with membership drawn from Suffolk local authorities, New Anglia Local Enterprise Partnership, Suffolk Chamber of Commerce, the University of Suffolk and the Suffolk Housing Board. The role of the Board is to lead on the delivery of growth in Suffolk and particularly the economic vision for growth; coordinate programmes and projects for growth directly and through facilitated work with partners; influence public / private stakeholders, businesses and politicians about the Suffolk priorities for growth, competitive position and prosperity; and managing risk through a flexible and innovative approach to growth. The proposed outcomes for the Board are as follows:

- Secure investment to deliver infrastructure that will enable development to the longer-term benefit of Suffolk's communities and businesses;
- Create a consistent, efficient, and transparent approach to planning to improve land supply;
- Make Suffolk an optimal location for commercial innovation, investment, and business expansion;
- Meet clearly identified skills, employment and economic development needs;
- Deliver the homes that Suffolk needs to match current and future demand; and
- Operate system wide approach to funding and finance supporting place-based initiatives over the medium and long term.

As part of the collaborative approach to growth, quarterly officer level meetings also take place with Norfolk planning authorities to jointly consider and address cross boundary strategic issues.

An Ipswich Strategic Planning Area (ISPA), previously referred to as the 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

Ipswich shares a border with the former East Suffolk area of East Suffolk, Babergh and Mid Suffolk Districts as shown in the Map 1 overleaf. The areas covered by Babergh, Mid Suffolk, Ipswich and the former East Suffolk area of East Suffolk form the Ipswich Strategic Planning Area.

#### 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. The border is formed mostly of the River Orwell, and the linkages between the two Districts relate to largely their relationship with Ipswich and to transport connections. Babergh is a largely rural District with the two main towns being Hadleigh and Sudbury. The eastern part of Babergh District has particularly strong connections with Ipswich due to the Borough boundary being tightly drawn.

#### Mid Suffolk District Council

Mid Suffolk borders the western and north western boundary of Ipswich Borough, this boundary is largely rural. 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 the main London to Norwich line.

#### East Suffolk District Council

East Suffolk 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.

Recently Suffolk Coastal District Council and Waveney District Council, have agreed to dissolve their existing Councils and create a new single Council for East Suffolk. The new Council came into operation of the 1<sup>st</sup> April 2019.

### 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 Strategic Planning Area

The Ipswich Strategic Planning Area (ISPA), formally the Ipswich Policy Area (IPA), arose following recognition that there were limitations on land available within the Borough boundary, which necessitated examination of a wider policy area to meet the requirements for housing and employment growth, and related infrastructure needs, centred on Ipswich. Accordingly, the ISPA was included in subsequent formal planning documents.

The ISPA Board, comprising of one Councillor from each of the local planning authorities, plus a Councillor from Suffolk County Council, provides the forum.



The ISPA 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 officers and councillors from Ipswich, East Suffolk, Mid Suffolk, Babergh and Suffolk County Council. A Statement of Intent to joint working on strategic issues through the ISPA Board signed by the Chief Executives of each authority was agreed in May 2011.

The Terms of Reference of the ISPA Board were revised in March 2018 and again in July 2019 they state the purpose of the ISPA 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 Strategic Planning Area, recognising Ipswich and neighbouring communities as a major economic growth area within the Greater Ipswich sub region, County of Suffolk and New Anglia Local Enterprise Partnership area.
- 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 Strategic Planning Area and coordinate the delivery of the necessary infrastructure – including transport, education, skills, power, green infrastructure, flood and coastal defences.
- To produce and facilitate agreement, and keep under review as necessary, Statement(s) of Common Ground in relation to the above.
- The Ipswich Strategic Planning Area covers the geographic areas of Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council and the former Suffolk Coastal District Council area of East Suffolk Council (the Ipswich Housing Market Area and Ipswich Functional Economic Area).

At the meeting in March 2016 a Memorandum of Understanding (MoU) was published. The MoU includes a commitment from the four authorities to work together on identifying and delivering objectively assessed needs for housing and employment, along with the necessary infrastructure, within the Housing Market Area/Functional Economic Area, comprising the three district and borough councils.

The MoU relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area commits the ISPA authorities to continued joint working to:

- Agree objectively assessed housing need for the Ipswich Housing Market Area (the local authority areas of Ipswich Borough, East Suffolk, Babergh and Mid Suffolk District Councils);
- Agree objectively assessed employment need for the Ipswich Functional Economic Area (also the local authority areas of Ipswich Borough, East Suffolk, Babergh and Mid Suffolk District Councils);
- Identify broad locations to accommodate forecast growth;
- Ensure the implementation of any mitigation measures required as a result of Habitats Regulations Assessment; and Identify and prioritise infrastructure delivery across the four local authority areas.

Following on from this, a separate Memorandum of Understanding has also been agreed between East Suffolk, Babergh and Mid Suffolk District Councils, Ipswich Borough Council and Suffolk County Council, in relation to the joint Recreational Avoidance and Mitigation Strategy for those authorities. This strategy will address the mitigation measures set out in the Habitats Regulation Assessments of the three Core Strategies for Babergh District Council, East Suffolk District Council and Ipswich Borough Council. The strategy is being developed with support from Natural England.

As the local plans cover one Housing Market Area and one Functional Economic Area, and share joint evidence in this respect, the authorities within the Ipswich Strategic Planning Area have committed to reviewing their Local Development Schemes and producing aligned Local Plans.

A Statement of Common Ground has been developed by the ISPA Board throughout the production of the authorities' local plans. This sets out the ways in which the authorities have worked together on the strategic cross boundary planning matters and the outcomes that have been reached. The Statement of Common Ground has been published at key points throughout the production of the Ipswich Local Plan and a signed statement (November 2019) is published as part of the Submission of the Final Draft Ipswich Local Plan. Chapter 4 of the Final Draft Local Plan reflects the agreements reached through the Ipswich Strategic Planning Area Board.

#### New Anglia Local Enterprise Partnership

Ipswich Borough falls within the New Anglia Local Enterprise Partnership (NALEP) area, which covers Norfolk and Suffolk and includes district and borough authorities and county authorities. Ipswich Borough Council contributed to the production of the NALEP Strategic Economic Plan which focuses on new jobs, businesses and homes and increased productivity. Identified growth sectors for the NALEP economy include:

- advanced manufacturing and technology;
- energy;
- information and communication technology;

- finance and insurance;
- food, drink and agriculture;
- ports and logistics;
- life sciences, biotechnology and bloodstock;
- tourism; and
- creative and cultural industries.

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 revised Core Strategy continues to support the growth of jobs in these sectors through policy CS13, 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 17,310 jobs in the Borough between 2016 and 2036.

#### Suffolk Growth Programme Board

Suffolk Growth Programme Board (formally known as the Suffolk Growth Group) was established five years ago to oversee and coordinate the growth opportunities in the County. The Suffolk Growth Programme Board, supported by Suffolk Chief Executives, Leaders and other key partners is now developing the joint evidence needed to support a Suffolk wide approach to the delivery of strategic economic growth including housing and infrastructure.

#### Suffolk Public Sector Leaders Group

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

#### 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
- East Suffolk District Council
- Suffolk County Council
- Environment Agency
- Historic England
- Natural England
- Civil Aviation Authority
- Homes England
- NHS Ipswich and East Suffolk Clinical Commissioning Group
- Office of Rail Regulation
- Integrated Transport Authority
- Highways England
- Marine Management Organisation



- New Anglia Local Enterprise Partnership

Anglian Water and UK Power Networks also met or engaged with but not regulatory 'duty' bodies.

Ipswich Borough Council has engaged with these bodies at consultation stage and on an ongoing basis as appropriate and has had regard to their comments in preparation of development plan documents.

#### Regulation 18 public consultation

Alongside the ongoing co-operation outlined in Table 1 formal consultation has also formed part of the production of the Preferred Options Plan.

Ipswich Borough Council undertook a public consultation on Issues and Options for the Ipswich Local Plan Review, consisting of Part 1, prepared jointly with East Suffolk District Council in order to consider cross boundary strategic issues. Part 2 addressed local issues for Ipswich Borough. The consultation took place between Friday 18<sup>th</sup> August and Monday 30<sup>th</sup> October 2017.

#### 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:

- Settlement Sensitivity Assessment (July 2018) (undertaken with Suffolk Coastal, Mid Suffolk and Waveney)
- Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (May 2017) (undertaken with Babergh, Mid Suffolk, East Suffolk and Waveney District Councils)
- Ipswich Economic Area Sector Needs Assessment (September 2017) (undertaken with Babergh, Mid Suffolk and East Suffolk District Councils).
- Retail and Commercial Leisure Study 2017 (undertaken with East Suffolk District Council).
- Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodations Needs Assessment (May 2017) (undertaken with Babergh, Mid Suffolk, East Suffolk and Waveney District Councils)
- Suffolk Coast Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (undertaken with Babergh, Mid Suffolk, Waveney and East Suffolk District Councils)
- Cross Boundary Water Cycle Study (undertaken with East Suffolk District Council)
- Local Transport Modelling (ongoing) (undertaken with Babergh, Mid Suffolk and East Suffolk District Councils and Suffolk County Council)
- Air Quality Screening (undertaken with East Suffolk District Council, Babergh and Mid Suffolk and Suffolk County Council)

#### 5. 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 Final Draft Ipswich Local Plan. 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 Strategic Planning Area Board. The Council continues to work closely with key infrastructure providers to ensure the Local Plan 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.

The following topics are those matters which are strategic cross boundary matters subject to the duty:

- Housing;
- Employment;
- Infrastructure;
- Internationally protected sites; and
- Transport and air quality mitigation measures

Table 1 – Summary of Duty to Co-operate process

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<p>Housing provision: Ipswich Borough is tightly bounded and there is limited 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 East Suffolk.</p>	<p>The Ipswich Strategic Planning Area Board have, on an ongoing basis, discussed housing need in the Ipswich Housing Market Area at their meetings.</p> <p>Suffolk Growth Programme Board</p> <p>The Suffolk Infrastructure Group, which provides a forum for officer based discussion of strategic infrastructure issues and has facilitated officer level co-operation on this issue.</p> <p>Meetings were held with adjoining authorities to discuss specific issues.</p>	<p>Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment, Sept 2017. Covers the Ipswich Housing Market Area which comprises Ipswich Borough and Babergh, Mid-Suffolk and East Suffolk Districts.</p> <p>Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, East Suffolk District Council and Suffolk County Council</p> <p>Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area.</p> <p>New policy ISPA4 (Cross Boundary Working to Deliver Sites) in the Final Draft Ipswich Local Plan requires the Council to work with neighbouring authorities to master plan</p>	<p>The ISPA Board work together on housing and employment needs and agreed that needs arising within the ISPA would be met within the ISPA.</p> <p>A working draft Statement of Common Ground has been published.</p>	<p>Work is also ongoing on the document Suffolk's Framework for Inclusive Growth. The Council's Executive resolved on 6<sup>th</sup> March 2018 that future versions of Local Plans for Ipswich Borough should have due regard to the report.</p> <p>The Council continues to liaise with Anglian Water and UK Power Networks regarding local plan allocations for Ipswich.</p> <p>Suffolk local authorities are working with Hemingway Design, Design South East and Hudson Architects to explore how good design can support the delivery of social and economic benefits. This will result in the publication of a interactive Suffolk Design Guide in web form.</p>

		<p>and deliver development on identified sites.</p> <p>Ipswich Strategic Planning Area Board Action Notes.</p>		
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Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<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>Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney, (May 2017), identifies a need for 73 residential pitches for Gypsies and Travellers, 9 plots for Travelling Showpeople and 28 residential moorings across the ISPA area in Ipswich, East Suffolk, Waveney, Babergh and Mid-Suffolk.</p> <p>Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, East Suffolk District Council and Suffolk County Council Statement of Common Ground.</p>	<p>Policy CS11 of the Ipswich Local Plan states that provision for additional permanent pitches to meet the joint needs of Ipswich and neighbouring authorities will be sought within the Ipswich Policy Area.</p>	<p>The Ipswich Strategic Planning Area Board engage with Suffolk wide work undertaken on Gypsy and Traveller provision.</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 Strategic Planning Area Board</p> <p>Suffolk Growth Programme Board – including attendance by a representative of the Local Enterprise Partnership</p> <p>Suffolk Infrastructure Group – at officer level, through collaboration across the County</p> <p>Regular meetings of Economic Development portfolio holders of Suffolk local authorities</p> <p>6-weekly meeting of infrastructure and planning leads to share evidence</p> <p>Ipswich Economic Area Sector Needs Assessment, (September 2017) undertaken jointly with Babergh, Mid Suffolk, East Suffolk through a steering group involving</p>	<p>New Anglia Local Enterprise Partnership Economic Strategy for Norfolk and Suffolk</p> <p>New Anglia LEP Growth Deal</p> <p>The East Norfolk and Suffolk Economic Strategy (2017)</p> <p>Suffolk Growth Strategy 2019/ Suffolk the Framework for Growth</p> <p>East of England Forecasting Model – Autumn 2017</p> <p>Updated IBC Economic Development Strategy 2018</p> <p>Local Energy East Strategy (May 2018)</p> <p>SoCG</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/Suffolk’s Framework for Growth and the LEP strategy and reflects ELNA findings.</p> <p>Employment land allocations amounting to approx. 27ha 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>Suffolk Design – Suffolk Local Authorities are working with Hemingway Design, Design South East and Hudson Architects to explore how good design can support the delivery of social and economic benefits</p>

	<p>planning and economic development officers. And ELSA</p> <p>Attendance at regional Infrastructure Conference</p> <p>Local Energy East Network - including the 3 LEP areas of Cambridgeshire and Peterborough, Hertfordshire and New Anglia</p> <p>Norfolk Suffolk Cross Border Meeting</p>			
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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 Infrastructure Group – at officer level, through collaboration across the County</p>	<p>Suffolk Local Transport Plan 3 2011 – 2031 (Suffolk County Council, 2011) – currently under review</p> <p>LEP transport strategy <a href="https://newanglia.co.uk/wp-content/uploads/2018/07/ITS-FINAL-280618.pdf">https://newanglia.co.uk/wp-content/uploads/2018/07/ITS-FINAL-280618.pdf</a></p> <p>SoCG</p> <p>RIS2 Highways England application to DfT for funding for A14 junction improvements</p> <p>Transport modelling for local plan reviews</p>	<p>Planned improvements to junctions on the A14.</p> <p>Ipswich Local Plan 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>Revised LTP should reflect planned growth</p> <p>The Ipswich Action Plan arising from the LTP</p> <p>Transport Mitigation Strategy</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>ISPA Board – SCC head of Transport attends</p>



<p>Flood Risk: Addressing issues of flood risk, water supply and waste water.</p>	<p>Cross Boundary Water Cycle Study for East Suffolk District Council and Ipswich Borough Council</p> <p>Working with the Environment Agency and Suffolk County Council as the Lead Local Flood Authority on the flood defence barrier.</p> <p>Involvement with Anglian Water and other local authorities in relation to the production of the SWMP.</p>	<p>Ipswich Strategic Flood Risk Assessment (Ipswich Borough Council, 2011)</p> <p>Suffolk Flood Risk Management Strategy (March 2016)</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, 2015)</p> <p>SPD Development and flood risk</p> <p>Ipswich Development and Flood Risk Supplementary Planning Document (Ipswich Borough Council, update 2013).</p>	<p>The provision of a tidal surge barrier is a key objective of the Core Strategy and Policies DPD. The barrier has been delivered and is operational. Policy DM4 sets out the approach to flood risk and new development and is supported by the EA.</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>Regular liaison with the Suffolk County Council as Lead Local Flood Authority.</p> <p>The Council continues to keep Anglian Water informed of future local planning for Ipswich. Correspondence is also sent to Anglian Water in respect of sites identified for development and their likely delivery to assist Anglian Water in their future forecasting.</p> <p>Ipswich Strategic Flood Risk Assessment (Ipswich Borough Council, 2019)</p> <p>Ipswich Development and Flood Risk Supplementary Planning Document (update due as part of SFRA update)</p>
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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 Historic England and Suffolk County Council in Dec 2018 focusing particularly on the prominence given to heritage in the DPDs.	Archaeology SPD adopted 28/11/18	<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 SPDs all completed.</p>	<p>The Council also has ongoing discussions with Historic England.</p> <p>Cooperation with the County Council Archaeological Service</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 East Suffolk 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 deliver 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>Habitats Regulation Assessment for Final Draft Ipswich Local Plan (2019).</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 RAMS document has been finalised and SPD prepared and out to consultation.</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>SoCG</p> <p>Ipswich Wildlife Audit (2019)</p>	<p>Identification of Green Rim in policy CS16 informed by Haven Gateway Infrastructure Study (2008).</p> <p>Green rim referred to in ISPA4</p> <p>New policy requirements in emerging Ipswich Final Draft Local Plan relating to biodiversity net gain.</p>	<p>ISPA board.</p>

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
Co-operation with the Marine Management Organisation	Ipswich responded to iteration two of the SE Marine Management Plan.	CS4 (Protecting our Assets) of the adopted Ipswich Borough Local Plan	The plan contains reference to the Inshore South East Marine Plan and Marine Management Special Protection Area. It also references the East Inshore and East Offshore Marine Plan.	Future liaison with the MMO on the South East Marine Management 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.

<b>Site</b>	<b>Issue</b>	<b>Action / Outcome</b>
<b><i>Sites within Ipswich Borough</i></b>		
Ipswich Garden Suburb (Policy CS10)	Large site for 3,500 dwellings, at northern edge of Ipswich adjoining the border with East Suffolk 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 East Suffolk District. The Country Park is also intended to mitigate impacts on European designated sites including those in East Suffolk District.
Northern End of Humber Doucy Lane (ISPA4)	Large strategic allocation for 496 dwellings linked to an adjoining site in East Suffolk for 150 dwellings.	Master planning jointly by the two local authorities to ensure delivery of strategic cross boundary sites.
Land north of Whitton Lane (IP140)	Employment allocation adjoining land in Mid Suffolk District Council area to the north of the site.	The Babergh and Mid Suffolk Preferred Option Plan provisionally allocated land to the north of IP140 for development.
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.

		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 Land West of Bourne Hill, Wherstead - 75 dwellings	The site is close to the southern edge of the built up area of Ipswich but outside Ipswich Borough.	Allocation of land for housing development within the Babergh and Mid Suffolk Preferred Options Local Plan 2019.
Land south east of Back Lane, Copdock and Washbrook – 226 dwellings	New allocation for 226 dwellings to the south west and adjoining the Borough boundary.	Allocation of land for housing development within the Babergh and Mid Suffolk Preferred Options Local Plan 2019.
Land north of the A1071, Sproughton Land at Poplar Lane, Sproughton – 1575 dwellings and 4ha employment	LA013 and LA014 together represent a substantial new residential allocation on the western edge of Ipswich, for 1,100 and 475 dwellings respectively and 4ha of employment land. The sites adjoins the western boundary of Ipswich.	Allocation of land for housing and employment development within the Babergh and Mid Suffolk Preferred Options Local Plan 2019.
Land north of Burstall Lane and west of B1113, Sproughton – 75 dwellings	This new allocation is close to the western boundary of Ipswich and is allocated 75 dwellings.	Allocation of land for housing development within the Babergh and Mid Suffolk Preferred Options Local Plan 2019. The Council welcomes the request for contributions towards junction improvement on the A1071.
Land south of Fitzgerald Road, Bramford / Land east of The Street, Bramford – 295 dwellings	New site allocations for 100 and 195 dwellings respectively. Site adjoins the Ipswich western boundary.	Allocation of land for housing development within the Babergh and Mid Suffolk Preferred Options Local Plan 2019. The Council welcomes the contributions sought to offset the impact of these developments.



