

Statement of Babergh District Council and Mid Suffolk District Council

Ipswich Local Plan: Examination of the Core Strategy and Policies Development Plan Document Review and the Sites Allocations and Policies (incorporating IP One Area Action Plan) Development Plan Document.

1.0 Introduction

- 1.1 The examination in public of the Ipswich Local Plan Core Strategy and Policies Development Plan Document Review and the Sites Allocations and Policies (incorporating IP One Area Action Plan) Development Plan Document commences on 22 March 2016. Babergh and Mid Suffolk District Councils have been invited to attend the sessions dealing with Legal Requirements, Duty to Co-operate and Cross Boundary Issues (Matter 1) and Objectively Assessed Needs for Housing and Employment Land (Matter 2).
- 1.2 Babergh District Council and Mid Suffolk District Council have worked together, sharing resources and management, for the last 3 years. Both Councils have recently approved an updated Joint Corporate Strategic Plan which, amongst other things, sets out its priorities for Economy and Environment. This includes a priority to achieve “Growth in new homes, jobs and businesses”.
- 1.3 The Councils remain separate Local Planning Authorities, with approved Core Strategies (adopted in 2012 in Mid Suffolk District Council and 2014 in Babergh District Council). The Councils are presently in the process of preparing a new Joint Local Plan, which will provide updated levels of employment and housing, new sites allocations, development management policies and revised policy designations.
- 1.4 In this respect, the Councils published an initial Regulation 18 issues and options consultation in January 2015. The relevant documents remain published on the Councils websites: <http://www.babergh.gov.uk/planning-and-building/planning-policy/local-babergh-development-framework/new-babergh-and-mid-suffolk-joint-local-plan-document/> .

2.0 Comment on Matter 1.3

Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance to the plan's preparation, as required by the Duty to Co-operate?

2.1 Babergh and Mid Suffolk Councils consider that Ipswich Borough Council has constructively and positively engaged with both Authorities on an on-going basis, not only within the framework provided by the Ipswich Policy Area (IPA) Board but also through continuing dialogue directly between both Authorities at senior officer, executive officer and member level. This engagement has been consistent over the life of the IPA Board.

3.0 Comments on Matter 1.4

Does the plan provide effective outcomes in terms of cross-boundary issues? In particular, is the approach of policies CS2 and CS7 that 3,778 dwellings will be provided later in the plan period (in line with policy CS6) soundly based and in accordance with national policy? Is there sufficient certainty that these housing needs will be provided for? If you consider that the plan is not sound in this respect could it be modified to make it so?

3.1 It is recognised that there are a number of cross-boundary issues that affect the Babergh and Mid Suffolk areas, of which housing is one. Both Councils actively support a collaborative approach to strategic and local planning for the Ipswich Policy Area and have a clear understanding of the lack of capacity within the Ipswich Borough boundary.

3.2 The whole of both districts form part of the Ipswich Housing Market Area. Therefore, it is recognised that both will necessarily be part of the solution in addressing the needs of the Policy area as a whole.

3.3 In addition to the consultations referred to at 1.4 above, the Councils have also carried out a "Call for Sites" for the purposes of establishing an understanding of the capacities of both districts. The analysis of this exercise has been recently completed and is being considered in the context of not only the responses to the consultations referred to above, but also the following:

- (i) A declining Five Year Supply of Housing Land position (in Mid Suffolk);
- (ii) A decline in delivery of housing over the last five years (in Babergh District);
- (iii) The need to update full objectively assessed housing needs;
- (iv) The need to address the needs of the Ipswich Housing Market Area, insofar as both Councils are affected;

(v) The emergence of a “whole Suffolk” approach through a Suffolk Strategic Plan, as advocated in “A Devolved Suffolk”, the recent bid for devolved powers. This bid is still being formed and is growing in scope and geographical area covered;

3.4 All of these circumstances have meant that to date, the Councils have not yet been able to confirm the level of need that can be met within Babergh and Mid Suffolk, as it is expected that this will be dealt with through either

- The new Babergh/Mid Suffolk Local Plan; or
- A joint or aligned review of the Local Plan process in the Ipswich Policy Area, starting in autumn 2016; and/or
- Through the development of the Suffolk Strategic Plan.

3.5 The Councils anticipate that dealing with this matter through the joint Local Plan review/Suffolk Strategic Plan will enable the necessary requirements of option analysis and sustainability appraisal within the Ipswich Policy Area or “whole Suffolk” can be properly carried out, leading to a greater confidence in both identifying locations for growth and the implementation of development.

3.6 It is noted that the importance of this approach has been recognised at Paragraph 6.2 of the “Technical Consultation on Implementation of Planning Changes”, (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/501239/Planning_consultation.pdf), which states:

“Collaborative and strategic plan-making: we recognise the advantages of strong strategic plan-making across local planning authority boundaries, in particular in addressing housing need across housing market areas. Many authorities successfully achieve this through the duty to cooperate and others are putting forward proposals to work strategically through devolution deals. We propose to have regard to how authorities are working cooperatively to get plans in place, including progress that has been made in devolution deal areas.”