

MATTER 1 – Legal Requirements, Duty to Cooperate and Cross Boundary Issues

Q1.1. We have no further comment to make at this stage.

Q1.2. We have no further comment to make at this stage.

Q1.3. Our representations at earlier stages of the plan-making process express a concern that the Duty to Cooperate has not been fulfilled by the Council. At this stage, we have no further comment to make. We would anticipate that adjoining planning authorities would wish to express their views on this matter at the Examination (in writing, in person, or by means of further evidence submitted by Ipswich Council) and wish to reserve our position pending any such submissions or appearances.

Q1.4. We wish to make the following additional comment:

1.4.1. Our previous representations in relation to Policy CS7 express a concern that a significant proportion of the Borough's housing requirement is to be met from as yet unidentified sources, including within adjoining local authority areas. We have not yet seen evidence of how this supply will be secured or when such agreements will be put in place.

1.4.2. The Ipswich Policy Area and its representative organisational groups and bodies offer a means by which such agreements may be secured, but it is not clear to us that such outcomes have been reached. In the absence of clear outcomes there cannot, in our view, be certainty that housing needs will be met. It is notable that the most recently adopted plans in adjoining authorities (notably Mid Suffolk, adopted in 2012, and Suffolk Coastal, adopted in 2013) make no explicit provision for accommodating cross-boundary needs from Ipswich, so it is only in emerging plans that any such mechanisms could be established. It is therefore, at present, a matter of speculation as to whether and how such mechanisms will be established.

1.4.3. The lack of certainty about whether and how the Plan's housing requirement will be delivered renders it unsound.

1.4.4. Remedies are available to address the Plan's deficiencies. There may be scope for other sites in the Borough to be actively brought forward, or for higher densities to be sought. Other remedies might include joint working, joint plan-making or other cross-boundary agreements. However, these rely upon the cooperation and collaboration of adjoining planning authorities. As with the Duty to Cooperate, we would anticipate that adjoining planning

authorities would wish to express their views on this matter at the Examination (in writing, in person, or by means of further evidence submitted by Ipswich Council). We wish to reserve our position pending any such submissions or appearances.