

Ipswich Borough Council Local Plan

Statement of Compliance with the Duty to Co-operate

November 2018



Planning and Development
Ipswich Borough Council
Grafton House, Russell Road
Ipswich IP1 2DE
(01473) 432019

email: planningpolicy@ipswich.gov.uk

website: www.ipswich.gov.uk

Contents

1. Introduction
2. Ipswich Geography and Context
3. Neighbouring local planning authorities
4. Key management / operational arrangements
5. Addressing strategic issues
6. Undertaking joint studies
7. Summary of co-operation in the preparation of the Ipswich Local Plan

Table 1 – Summary of Duty to Co-operate process

Table 2 – Site Allocations

Appendix 1 – Draft Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area

Appendix 2 – Ipswich Policy Area Board Terms of Reference

Introduction

This statement sets out the processes, actions and outcomes undertaken by Ipswich Borough Council to address the Duty to Co-Operate in relation to the Core Strategy and Policies Development Plan Document and to the production of the Site Allocations and Policies (incorporating IP-One Area action plan) Development Plan Document review and has been produced as part of the Local Plan Review Preferred Options for public consultation.

The Duty to Co-operate 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 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 Suffolk Coastal;
- 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.

Ipswich geography and context

Ipswich is the county town of Suffolk. The Borough has a relatively tight administrative boundary 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 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.

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 the 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.

Recently Suffolk Coastal District Council and Waveney District Council, the most easterly District Council in England, located to the north east corner of Suffolk, have agreed to dissolve the existing Councils and create a new single Council for East Suffolk. Subject to parliamentary approval, the new Council will come into being and begin operations on 1st April 2019.

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 Policy Area

The Ipswich Strategic Planning Area (ISPA), formally the Ipswich Policy Area (IPA), arose following recognition in the 1990s that there were limitations on land available within the Borough boundary. This 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 ISPA was included in subsequent formal planning documents.

The geography of the ISPA includes Ipswich and nearby parishes in Suffolk Coastal, Babergh and Mid Suffolk, being extended to include Westerfield following adoption of the Suffolk Coastal Core Strategy and Development Management Policies development plan document in July 2013.

The ISPA Board was established in 2007 and meetings have been held regularly since December 2011, following the demise of the regional structures and the Regional Strategy. The Board is made up of one officer and one councillor from each of the three Districts, Ipswich Borough and Suffolk County Council. The draft Statement of Common Ground evidences this work. The Board does not have any formal decision making powers, nor is it responsible for planning or other functions. However, it helps to increase understanding of development issues and pressures in each area and facilitate joint working to inform local plans.

The terms of reference of the ISPA Board were revised in March 2018, 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 Suffolk Coastal District Council (the Ipswich Housing Market Area and Ipswich Functional Economic Area).

At the meeting on 15th October 2015 a draft Memorandum of Understanding (MoU) was presented to the Board. The MoU includes a commitment from the four Local 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. It was agreed that a further draft would be presented to leaders for consideration; a final draft was published in March 2016. A signed final version was published in June 2016 and is shown in appendix 2.

The MoU relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area (June 2016) 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, Suffolk Coastal, 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, Suffolk Coastal, 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 Suffolk Coastal, 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 four Core Strategies for Babergh District Council, Mid Suffolk District Council, Suffolk Coastal 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 with a view to producing aligned Local Plans.

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, borough and 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 identified growth sectors for the NALEP economy, these 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 review through policy CS13 (Planning for Jobs Growth) continues to support 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 of approximately 15,580 jobs in the Borough between 2018 and 2036.

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.

Suffolk Growth Programme Board

Suffolk Growth Programme Board (SGPB), formerly known as the Suffolk Growth Group, changed to a Programme Board in December 2016 to reflect its integrated approach to delivering a programme of joint growth initiatives across Suffolk.

The role of the Growth Programme Board as agreed in December 2016 is to:

- lead: the Suffolk Growth Framework at officer level, and through collaboration across the County ensure GPB outcomes are communicated to all staff and members
- deliver: Suffolk's economic vision and achieve impact through the coordination of programmes and projects directly managed by the GPB and through facilitated work with partners
- influence (through engagement): public / private stakeholders, businesses and politicians about the priorities for growth in Suffolk and the opportunities for improving the region's competitive position and prosperity
- manage risk: by understanding upcoming risks / unknowns and responding to these through a flexible & innovative approach to economic growth

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.

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
- 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 and has had regard to their comments in preparation the Ipswich Local Plan Review Preferred Options.

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 Local Plan.

The Council consulted the public on issues and options for the Ipswich Local Plan Review in 2017, consisting of Part 1, prepared jointly with Suffolk Coastal District Council in order to consider cross boundary strategic issues and Part 2 to address local issues for Ipswich Borough. The consultation took place between Friday 18th August and Monday 30th October 2017.

Undertaking joint studies

A number of studies have been jointly commissioned or undertaken, which inform the evidence base for the Preferred Options Local Plan. 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, Suffolk Coastal and Waveney District Councils)
- Ipswich Economic Area Sector Needs Assessment (September 2017) (undertaken with Babergh, Mid Suffolk, Suffolk Coastal and Waveney District Councils)
- Retail and Commercial Leisure Study 2017 (undertaken with Suffolk Coastal District Council).
- Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodations Needs Assessment (May 2017) (undertaken with Babergh, Mid Suffolk, Suffolk Coastal and Waveney District Councils)
- Suffolk Coast Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (ongoing) (undertaken with Babergh, Mid Suffolk, Waveney and Suffolk Coastal District Councils)
- Cross Boundary Water Cycle Study (ongoing) (undertaken with Suffolk Coastal District Council)
- Local Transport Modelling (ongoing) (undertaken with Babergh, Mid Suffolk and Suffolk Coastal District Councils)

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 Strategic 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

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 Suffolk Coastal.</p>	<p>Ipswich Strategic Planning Area Board (ISPA). There has been on-going discussion through the Ipswich Strategic Planning Area Board regarding housing need in the Ipswich Housing Market Area.</p> <p>The Suffolk Growth Programme Board meet regularly to discuss housing performance and joint strategic planning. The Suffolk Housing Board has recently joined to reflect the impact housing delivery has on achieving place based growth.</p> <p>In addition to the formal consultation, discussions have taken place with Suffolk County Council at an officer level regarding the implications of individual allocations within both DPDs on archaeology, transport, and education capacity.</p>	<p>Ipswich and Waveney Strategic Housing Market Assessment, May 2017. This assessment demonstrates that Ipswich, Mid Suffolk, Babergh and Suffolk Coastal constitute a housing market area.</p> <p>Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (underway). The authorities have worked together on closely aligning the criteria used for assessing the sites.</p> <p>Ipswich Strategic Planning Area (ISPA) Board action notes and topic papers.</p> <p>Suffolk Framework for Inclusive Growth.</p> <p>Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich</p>	<p>A Memorandum of Understanding and a Statement of Common Ground existing between Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.</p> <p>Policy ISPA4 (Cross Boundary Working to Deliver Sites) of the Ipswich Preferred Options Draft Local Plan requires the council to work with neighbouring authorities to master plan and deliver development on identified sites.</p> <p>The Council's Executive has resolved that future Local Plans for Ipswich Borough should have due regard to the Suffolk Framework for Inclusive Growth.</p>	<p>The MoU and Statement of Common Ground commit the ISPA authorities to continued joint working.</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.</p>

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>The Public Sector Leaders Group and Suffolk Chief Executives Group are working to identify three short stay sites across Suffolk. A Higher Level Steering Group has been set up to oversee the process. The Suffolk Gypsy and Traveller Accommodation Needs Subgroup assess sites.</p> <p>Ipswich Strategic Planning Area Board (ISPA).</p>	<p>Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (May 2017), jointly commissioned by Ipswich Borough, Suffolk Coastal, Waveney, Babergh and Mid-Suffolk Districts.</p> <p>Ipswich Strategic Planning Area (ISPA) Board action notes and topic papers.</p>	<p>A Memorandum of Understanding and a Statement of Common Ground existing between Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.</p> <p>The Preferred Options Local Plan provides a positive policy for the provision of gypsy and traveller sites. Policy CS11 states that where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.</p>	<p>Ongoing discussion through Public Sector Leaders Group, Suffolk Chief Executives Group and the Suffolk Gypsy and Traveller Accommodation Needs Subgroup.</p> <p>The ISPA Board will provide a mechanism for considering how to address the need should any authority not be able to meet their own need for permanent pitches.</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 (LEP) works with businesses, local authority partners and education institutions to drive growth and enterprise in Norfolk and Suffolk.</p> <p>Ipswich Strategic Planning Area Board. The Board provides a mechanism to inform how each local authority will approach key employment centres within each Local Plan and for the five local authorities to work together on the production of evidence and the coordination of employment growth requirements.</p> <p>The Suffolk Growth Programme Board meet regularly to discuss employment and economic development needs.</p> <p>Local Energy East Network which includes the three LEP areas of Cambridgeshire and</p>	<p>Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016).</p> <p>Ipswich Economic Area Sector Needs Assessment, (September 2017).</p> <p>Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (underway).</p> <p>Norfolk and Suffolk Economic Strategy (2017).</p> <p>East of England Forecasting Model.</p> <p>New Anglia LEP Growth Deal.</p> <p>Ipswich Opportunity Area 2017-20 Delivery Plan.</p>	<p>The Employment Land Needs Assessment (2016) defines the Ipswich Functional Economic Area as the area covered by the four local planning authority areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.</p> <p>The Preferred Options Local Plan incorporate policies which consider strategic matters related employment growth. Core Strategy Policy CS13 sets the basis for allocation of land for employment uses. This approach aligns with broad areas for growth identified in the LEP strategy.</p> <p>Policy SP12 supports and facilitates the future development of University Campus Suffolk.</p>	<p>The MoU and Statement of Common Ground commit the ISPA authorities to continued joint working.</p> <p>The joint Ipswich Economic Area Sector Needs Assessment will inform future site requirements.</p> <p>Suffolk Design Guide - 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>Peterborough, Hertfordshire and New Anglia.</p> <p>Ipswich Opportunity Area partnership Board</p>			
--	--	--	--	--

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 Local Transport Plan 3 2011 – 2031 (Suffolk County Council, 2011) – currently under review.</p> <p>Transport Modelling Methodology Report and Results Report Volume 1: Suffolk Coastal and Ipswich (August 2018).</p> <p>Integrated Transport Strategy for Norfolk and Suffolk (May 2018).</p> <p>Suffolk Growth Programme Board newsletter.</p> <p>ISPA Statement of Common Ground addresses strategic transport infrastructure priorities. Ipswich Strategic Planning Area (ISPA) Board action notes.</p>	<p>RIS2 Highways England application to DfT for funding for A14 junction improvements.</p> <p>Policy CS5 aims to maximise sustainable transport solutions including introduction of an integrated cycle network.</p> <p>The Emerging Suffolk Local Transport Plan (LTP) reflects planned growth in Ipswich.</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 attended by Suffolk County Council Head of Transport.</p> <p>Further transport modelling will take place where necessary to inform the Babergh Mid Suffolk and Ipswich Regulation 19 plans.</p>

<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, 2015)</p> <p>Suffolk Flood Risk Management Strategy (March 2016)</p>	<p>The provision of a tidal surge barrier is a key objective of the Core Strategy and Policies DPD. It is anticipated that the barrier will be completed by spring 2019.</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>Ipswich Development and Flood Risk Supplementary Planning Document (Ipswich Borough Council, update 2016).</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, 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>
---	---	--	---	---

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<p>Protection of Heritage Assets, given the significance of historic assets in the central part of Ipswich</p>	<p>Discussions with Historic England.</p> <p>Liaison with Suffolk Archaeological Service.</p>	<p>Development and Archaeology Supplementary Planning Document (October 2018)</p> <p>Production of Urban Character SPD. The first four parts of the Urban Character SPD (California, Norwich Road, Gipping & Orwell Valley and Parks) were adopted by the Council in January 2015 and the fifth part relating to Chantry, Stoke Park and Maidenhall was adopted in November 2015.</p>	<p>Increased prominence given to protection and enhancement of heritage assets through the Preferred Options Local Plan.</p>	<p>Ipswich Conservation Area Review, Ipswich Urban Characterisation Studies and Ipswich Local List Review</p> <p>Adoption of Town Centre and Waterfront Public Realm Strategy Supplementary Planning Document</p> <p>The Council also has ongoing discussions with Historic England and Suffolk Archaeological Service.</p>

<p>Addressing cumulative impacts on the Stour and Orwell Estuaries Special Protection Area (SPA) from housing developments in Ipswich and surrounding districts.</p>	<p>Recreational Avoidance and Mitigation Strategy (RAMS) Steering Group. The Recreational Avoidance and Mitigation Strategy for Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal District Councils is currently being undertaken jointly with officers from Ipswich Borough, Babergh District, Waveney District, Mid-Suffolk District and Suffolk Coastal District Councils.</p> <p>Discussions with Natural England.</p>	<p>Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Waveney District, Mid-Suffolk District and Suffolk Coastal District Councils Technical Report (underway)</p>	<p>The Recreational Avoidance and Mitigation Strategy will help guide development and activity which will impact on existing Special Protection Areas and Special Areas of Conservation (European sites) in a sustainable way.</p>	<p>On-going cooperation to prepare, adopt and implement the Recreational Avoidance and Mitigation Strategy.</p>
--	---	---	--	---

Strategic Issue	Management and Working Arrangements	Evidence base	Outcome	Ongoing co-operation
<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 and the Environment Agency.</p>	<p>Haven Gateway Green Infrastructure Study (2008)</p> <p>Haven Gateway Green Infrastructure Study – Ipswich Policy Area Update 2015.</p> <p>Green infrastructure and Suitable Alternative Natural Greenspaces are identified within the strategic infrastructure priorities in section H of the Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council Statement of Common Ground.</p>	<p>Identification of Green Rim in policy CS16 informed by Haven Gateway Infrastructure Study (2008).</p> <p>Green rim referenced in policy ISPA4 (Cross Boundary Working to Deliver Sites) of the Preferred Options Ipswich Local Plan.</p>	<p>The ISPA Board continue to work together to provide green infrastructure and SANGs.</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.		The Preferred Options Local plan references 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.

Site	Issue	Action / Outcome
Sites within Ipswich Borough		
Ipswich Garden Suburb (Policy CS10)	Large site for 3,500 dwellings, at northern edge of Ipswich adjoining the border with Suffolk Coastal 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 Suffolk Coastal District. The Country Park is also intended to mitigate impacts on European designated sites including those in Suffolk Coastal District.
Land north of Whitton Lane (IP140)	Employment allocation adjoining land in Mid Suffolk District Council area to the north of the site.	Options for development of land to the north of IP140 for employment uses or mixed development were identified in the Babergh District Council and Mid Suffolk District Council Local Plan: Strategic Site Allocations & Designations – Issues and Options Early Stage Consultation (Regulation 18) (January 2015).
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.
Employment allocations at Ransomes Europark (IP146)	The proposed allocations at Ransomes Europark form the easternmost boundary of Ipswich Borough. Any further extension of the Ransomes Europark eastwards would need to be within Suffolk Coastal District.	Land to the east of Ransomes Europark is allocated as a General Employment Area in the 2001 Suffolk Coastal Local Plan (through saved policy AP215). Policy AP215 acknowledges that this land will need to be accessed through the existing Ransomes Europark in Ipswich Borough. Policy SP5 of the Suffolk Coastal Core Strategy (2013)

		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.
Humber Doucy Lane South	Eastern edge of Ipswich adjoining the border with Suffolk Coastal District. Challenge of preserving the separate identity of Rushmere.	The site sheet for the Humber Doucy Lane South includes a requirement to ensure land is safeguarded to maintain the separate identity of Rushmere.
<i>Sites outside Ipswich Borough</i>		
Allocation for mixed use development at Babergh Ipswich fringe (Babergh District Council)	The site is close to the southwest edge of the built up area of Ipswich but outside of Ipswich Borough.	Allocation of land for housing and employment development within the Babergh Core Strategy (2013). Ipswich Borough Council supports the principle of a mix of employment and residential uses on this site.
Planning permission for housing development at Trinity Park (Suffolk Coastal District)	The site adjoins housing development at Warren Heath which forms part of the wider built up area of Ipswich although is outside of Ipswich Borough.	Outline planning permission was granted for 300 dwellings at Trinity Park in December 2013. Comments submitted by Ipswich Borough Council stated that the Council supports the principle of residential development on the site.

Appendix 1

Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area - Draft

This Memorandum of Understanding has been prepared in order to address the requirements of the Localism Act 2011, section 110, 'Duty to co-operate in relation to planning of sustainable development'.

Ipswich Borough Council's administrative boundary is tightly drawn than the actual Housing Market Area and Functional Economic Area and, therefore, there is a need to work jointly with neighbouring areas to ensure that future needs for development and infrastructure are met. The Duty to Co-operate Statement prepared to accompany the submission draft Core Strategy Review (December 2014 and updated September 2015) describes how strategic cross-boundary issues are being jointly addressed. It builds on long-established joint working between the authorities.

The Memorandum of Understanding establishes a framework for co-operation between Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council in relation to the delivery of housing across the Housing Market Area and employment growth across the functional economic area.

Parties to the Memorandum of Understanding

The Memorandum of Understanding is an agreement between the following parties:

- a. Babergh District Council
- b. Ipswich Borough Council
- c. Mid Suffolk District Council
- d. Suffolk Coastal District Council and
- e. Suffolk County Council.

Scope of the Memorandum of Understanding

18

The Memorandum of Understanding commits the parties to the following actions:

1. To agree objectively assessed housing need for the Ipswich Housing Market Area, which consists of the local authority areas of Ipswich Borough, Suffolk Coastal, Babergh and Mid Suffolk District Councils;
2. To agree objectively assessed employment need for the Ipswich Functional Economic Area, which also consists of the local authority areas of Ipswich Borough, Suffolk Coastal, Babergh and Mid Suffolk District Councils;
3. To identify broad locations to accommodate forecast growth;
4. To ensure the implementation of any mitigation measures required as a result of Habitats Regulations Assessment; and
5. To identify and prioritise infrastructure delivery across the four local authority areas.

In relation to mechanisms, the Memorandum of Understanding also commits the parties to the following actions:

6. To review and agree the Ipswich Policy Area boundary in early 2016; and
7. To agree the form of the future joint or aligned plan(s).

Specifically in relation to point 1 above, the Proposed Submission Ipswich Borough Council Core Strategy and Policies Development Plan Document Review November 2014, as updated September 2015, identifies objectively assessed housing need for Ipswich Borough of 13,550 dwellings 2011-2031 (through Policy CS7 The Amount of Housing Required). This figure needs to be considered in the context of the objectively assessed housing need for the Ipswich Housing Market Area, identified in 2013 as 34,250.

Of the total requirement for Ipswich Borough of 13,550 dwellings 2011-2031, land for the delivery of 5,578 dwellings remains to be identified. It is expected that some of these will be delivered on windfall sites within Ipswich Borough, but some will need to be planned through joint work with neighbouring local authorities.

Objectively assessed need for housing is updated periodically and therefore the figure to be planned for is likely to change in the future.

Timetable for the joint work

Ipswich Borough Council and Suffolk Coastal District Council have set out the following timetable through their current 'in effect' local development schemes. Babergh and Mid Suffolk District Councils are scheduled to approve the same timetable through a revised local development scheme.

<i>Notify stakeholders & invite representations</i>	Oct 2016-Jun 2018
<i>Publish draft proposed submission plan for inspection & invite representations</i>	Sept-Oct 2018
<i>Submit plan & submission documents to Secretary of State</i>	Feb 2019
<i>Independent examination hearings</i>	Jun 2019
<i>Receive & publish Inspector's recommendations</i>	Oct 2019
<i>Adopt the plan</i>	Nov-Dec 2019

Mechanism for the Joint Work

The parties already have a forum for joint working through the Ipswich Policy Area (IPA) Board. Its terms of reference are attached at Appendix 1.

The joint work will take the form of a joint or aligned plan review. It is yet to be determined whether the plan review will be a single document approved either by a formally-constituted joint body or by each respective council, or aligned local plans for each of the local planning authorities.

The IPA Board will provide the mechanism for joint working in the short to medium term. The earliest work that the IPA Board will undertake prior to April 2016 will be to review the IPA boundary

and agree the form of the joint plan. In doing so, it will have regard to any strategic planning work which may be looking at different geographies, including Suffolk-wide.

The IPA does not have decision-making powers and therefore the parties will agree outcomes through each Council's existing decision-making structures, in accordance with their constitutions.

Roles and responsibilities

The planning policy services of Ipswich Borough Council, Suffolk Coastal District Council, Mid Suffolk District Council and Babergh District Council will lead the preparation of the work, with support from Suffolk County Council. Alternatively, a joint strategic planning team drawing staff from the constituent local authorities will be set up. The IPA Board terms of reference already sets out roles and responsibilities in relation to that body.

Limitations

This Memorandum of Understanding does not alter the fact that Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council remain the local planning authorities for their respective areas. The key objective of this Memorandum of Understanding is to ensure that strategic policies are consistent across the local authorities. In addition, each local authority will have non-strategic, locally-specific policies covering a range of topic areas, which will need to be considered and included in appropriate documents.

SIGNATURES

Signature: Date

Signed on behalf of Babergh District Council

Signature: Date

Signed on behalf of Ipswich Borough Council

Signature: Date

Signed on behalf of Mid Suffolk District Council

Signature: Date

Signed on behalf of Suffolk Coastal District Council

Signature: Date

Signed on behalf of Suffolk County Council

Appendix 2 Terms of reference of the Ipswich Policy Area Board

Revised Terms of Reference, March 2018

- 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 Suffolk Coastal District Council (the Ipswich Housing Market Area and Ipswich Functional Economic Area).

Constitution

The Board will consist of one Councillor and one or more Officers (as necessary) from the following authorities:

Ipswich Borough Council
Suffolk Coastal District Council
Mid Suffolk District Council
Babergh District Council
Suffolk County Council

Each authority will nominate its representatives to the Board.

Ipswich Borough Council will provide the Secretariat to the Board, including minutes of all meetings and processing all Freedom of Information requests until 31 st March 2019, when the Secretariat role will pass to another authority.

The Board will be chaired by the Councillor representative for Suffolk County Council until December 2019.