

## **IPSWICH CORE STRATEGY REVIEW AND SITES ALLOCATIONS & POLICIES EXAMINATION LOCAL PLAN EXAMINATION - STAGE 1**

### **MATTER 1 – LEGAL REQUIREMENTS, DUTY TO COOPERATE AND CROSS-BOUNDARY ISSUES**

#### **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 Cooperate?**

Unfortunately, even though the Council has shown evidence to date of cooperation by virtue of collaboration on the SHMA 2012, the evidence of ongoing cooperation is weak. While the Council's *Statement of Compliance with the Duty to Cooperate* (December 2015) refers to the Ipswich Policy Area the *Babergh & Mid Suffolk Joint Local Plans Programme 2014-2016/17* (version January 2015) does not. Therefore, in terms of the strategic issue of planning for Ipswich's unmet housing need, we are not assured that the mechanisms and relationships are in place for future effective working. As such, we consider that the legal duty has been failed.

We note the *Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area (Draft)* (see appendix 2 of the *Statement of Compliance with the Duty to Cooperate* (December 2015)). It is not clear if this memorandum of understanding has been agreed and signed by the five authorities. Given that this was a draft document in December 2015 this does suggest that cooperation on the strategic question of housing has not been effective before the local plan was submitted for examination (the plan was submitted some months before this).

It should be borne in mind that the Suffolk Coastal Local Plan has an acknowledged unmet need and that the Council is committed to review its local plan by 2015 (see paragraph 3.28). This has not occurred. The OAN for Suffolk Coastal Council is 11,000 dwellings but capacity for 10,370 has only been identified. This indicates that the unmet need across the HMA is larger – 3,378 for Ipswich and 630 for SCDC. The SHMA 2012, however, suggested that the need figure for Suffolk Coastal was much greater at 14,200, although there is a need for updated household projections to be considered. These would point to a lower figure of projected need (9,000).

The assessed need for Mid Suffolk Council is significantly greater than the current planned housing requirement in the Core Strategy of 2008. The SHMA 2012 had assessed the need in Mid Suffolk to be 11,100 dwellings whereas the current local plan only provides for 2,625 (see Policy FC 2 on page 15). There is no Ipswich HMA-wide strategy to address this problem. There is no reference to this as an issue in the supporting documentation. Figure 5.3.3 of the SHMA illustrates that outward migration into Mid Suffolk from Ipswich is higher than inward migration from Mid Suffolk to Ipswich (based on ONS 2010 data). The effect of the scale of the undersupply compared to need in Mid Suffolk will alter these trends resulting in more people remaining in Ipswich who might otherwise have left for Mid Suffolk. This is an issue that should have been addressed through the duty to cooperate.

**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 3,378 dwellings will be provided for by working with neighbouring local authorities later in the plan period (in line with policy CS6) soundly based an 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?**

The Local Plan will not be able to meet its OAN in full. Nor will it address the unmet needs of the HMA (Suffolk Coastal and Mid Suffolk). The shortfall for Ipswich, is unclear because the Council's expression of its capacity is so ambiguous. Nevertheless, we accept the figure cited above of 3,378. However, we note that the shortfall could be 5,578 dwellings on the basis of the *Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area (Draft)* (see appendix 2 of the *Statement of Compliance with the Duty to Cooperate* (December 2015)).

Paragraph 8.79 of the Local Plan states that the identification of land to accommodate Ipswich's housing land supply needs (years 11-15) will require "*future discussions...with neighbouring authorities within the Ipswich Policy Area due to capacity constraints.*"

The Council's *Statement of Compliance with the Duty to Cooperate* (December 2015) at Table 1 refers to the Ipswich Policy Area Board (IPA Board) agreeing in November 2013 to work together on accommodating the housing needs of the HMA. There is no more detail than this. There is no plan of action for all four local plans to be reviewed by an agreed date that would enable the unmet need to be provided in time.

Scrutiny of the *Babergh & Mid Suffolk Joint Local Plans Programme 2014-2016/17* (version January 2015) throws into doubt this commitment. This paper shows that these two Councils will work together to produce aligned development policy documents. The paper does not refer to working with Ipswich in the future or cooperation in the preparation of a joint evidence base with Ipswich. The paper does not refer to Ipswich's unmet housing need. Worryingly, the paper does not even refer to the Ipswich HMA as a planning unit. Nor does it refer to the preparation of a joint SHLAA for the HMA. Therefore, it would be unreasonable for one to conclude that assistance from Babergh and Mid Suffolk Councils will be forthcoming.

In the *Memorandum of Understanding relating to the delivery of housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area (Draft)* (see appendix 2 of the *Statement of Compliance with the Duty to Cooperate* (December 2015)) a timetable has been set out for work between Ipswich and Suffolk Coastal District Council for the preparation of updated plans. The adoption of the finalised plans is scheduled for Nov-Dec 2019. This implies that work will start with immediate effect on Ipswich's new local plan as soon as this version of the local plan is adopted. It also implies that Suffolk Coastal District Council will accommodate the entire shortfall, otherwise the other two councils would have been involved.

It is not clear if this memorandum of understanding has yet been agreed and signed by the five authorities. Even so, the date of the Statement implies that effective cooperation has not been secured prior to submission of the local plan.

Lastly, we are not convinced that relying on future cooperation towards the end of the life of the plan in 2031 will prove effective. To accommodate the unmet housing need for Ipswich, this would require all four local authorities to produce revised local plans and then get these examined and adopted. Once adopted, the housing allocations (in Babergh, Mid Suffolk and Suffolk Coastal to support Ipswich) would need to be implemented, and the houses built in time – all before 2031. We are not convinced that this is realistic. Local plans may be aspirational, as the NPPF reminds us, but they must also be realistic. There is no convincing evidence before third parties that the duty to cooperate has been effective.

The problem of Ipswich's unmet need is something that needs to be resolved by the plan. It is not appropriate to address this through some later review because that review cannot be guaranteed. The plan needs to include a commitment from the other three authorities (we assume it is the other three, and not just Suffolk Coastal Council) that they will each make allocations in their new plans which will be in place by 2019 that will provide for 3,378 homes for Ipswich.

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