Dear Mr Barker,

Ipswich Borough Council’s Response to the Babergh and Mid Suffolk Joint Local Plan (Regulation 18) – Preferred Options consultation.

As both Babergh & Mid Suffolk (B&MS) and Ipswich Borough Council (IBC) are members of the Ipswich Strategic Planning Area (ISPA) Board it is vital that IBC and B&MS as well as the other authorities which collectively form the ISPA Board, work together to ensure that the delivery of housing and employment growth, including supporting infrastructure, is strategically planned and coordinated across the strategic planning area.

This need to plan strategically across authorities is a legal duty by way of the ‘Duty to Cooperate’ in the ongoing and active preparation of Local Plans which has been referred to in your consultation documents.

IBC has now reviewed the Regulation 18 Babergh & Mid Suffolk Joint Local Plan–Preferred Options documents and makes several comments that are outlined below. The content of this representation has been endorsed by members at the Planning & Development Committee meeting of 18 September 2019.

1. **Part 1 Strategic Polices**

1.1 Chapter 3 sets out the ten objectives for the emerging Babergh & Mid Suffolk Local Plan.

1.2 **Objective 1 ‘Housing’** commits the Babergh & Mid Suffolk to ‘delivery of the right types of homes, of the right tenure in the right place meeting need’.

1.3 Through the Statement of Common Ground (SoCG), the four ISPA authorities (Ipswich, East Suffolk, Babergh & Mid Suffolk, and Suffolk County Council) have committed to work together on the coordination of housing growth
requirements where this relates to strategic cross boundary matters and monitor and review evidence.

1.4 IBC considers that it is important that this objective reflects the ISPA SoCG in its various iterations, and government guidance so that reference is included in the B&MS joint plan to reflect requirement for local authorities to work together at a strategic level to meet unmet need for all the ISPA authorities.

1.5 **Objective 3 ‘Economy’**

1.6 IBC consider there should be a more strategic emphasis on the wider importance of Felixstowe to the ISPA area and in particular the need to support sustainable transport and modal shift.

1.7 It is important to ensure therefore that new developments in Babergh and Mid Suffolk are well-served by rail to Ipswich, and improvements to the east - west rail connections in terms of capacity and frequency can be facilitated, together with other sustainable mitigation measures including improved cycle networks.

1.8 For example, it is considered that reference to the Felixstowe to Nuneaton line for freight traffic and also passenger traffic that uses the line, which includes the Norwich to London, Ipswich to Peterborough and Ipswich to Cambridge services should be included. In addition, transport infrastructure such as rail needs to be considered across the Housing Market area and Ipswich Functioning Economic Area.

1.9 To date, Ipswich Borough Council has declared a total of five Air Quality Management Areas. Source apportionment data for Ipswich shows that the major air pollution concern is nitrogen dioxide emitted from road transport predominantly by car emissions. Further monitoring work has revealed that approximately 27% of trips in and out of Ipswich are generated by residents of Babergh & Mid Suffolk District Council (Table 22, Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area). If Ipswich is to improve its air quality, sustainable alternative means of travel in and around the town are needed.

1.10 It is therefore considered important to ensure that new developments in B&MS are well-served by rail to Ipswich, and improvements to east to west rail connections in terms of capacity and frequency can be facilitated, together with other sustainable mitigation measures including improved cycle networks.

1.11 The Borough is pleased to see that the B&MS joint plan supports the Ipswich Northern Route transport project and the strengthening of Ipswich and surrounding area as a key economic driver for the County.

1.12 *Duty to Co-operate*
Chapter 5 concerns the Duty to Cooperate. The Duty to Cooperate is applied to local planning authorities by Section 110 of the Localism Act 2011. The National Planning Policy in the NPPF (2019) also identifies that strategic policy making authorities should maintain one or more statements of common ground to document cross boundary matters being addressed and the process in cooperating to address these.

1.13 Table 1 in the B&MS Regulation 18 joint plan outlines the ‘Key Duty to Cooperate Issues’, Issue 2 reads ‘resolving if unmet housing need is identified and the approach to delivery of the housing requirement’. The text goes on ‘no duty to cooperate partners have identified any unmet need’. Whilst this is true at the present time, it is considered that some acknowledgement of the agreement between the authorities in the ISPA to co-ordinate delivery of development and monitor and review evidence as necessary should be added as this ensures a more strategic position is adopted. Indeed, this issue was considered by the Inspector at the recent Suffolk Coastal Local Plan Inquiry, where the Inspector was concerned the Suffolk Coastal Final Draft Plan did not adequately address the issue of unmet housing need should this arise within the ISPA.

1.14 The purpose of Table 1 is considered to be slightly ambiguous. It is unclear whether there is a commitment from B&MS to deliver against the issues identified within the table. IBC consider that this commitment requires clarification in this part of the plan and should be more explicit.

1.15 Ipswich and East Suffolk have committed to including a set of shared strategic policies within their plans known as ISPA1-4. It is considered that B&MS should include these strategic policies in its joint Local Plan to demonstrate the four authorities commitment to work together on cross boundary strategic matters.

1.16 Housing Requirement

Chapter 6 concerns the housing requirement across the two Districts. Using the government’s new Standard Method, Babergh is required to deliver 7,560 new dwellings across the plan period, (an annual target of 420 dwellings). Mid Suffolk has employed the same approach to calculating housing need and is committed to providing 10,008 homes during the plan period, 556 annually. In total, the two authorities will provide 35,334 homes by 2036, 1,963 per year.

1.17 These figures include a buffer of 20% to create flexibility but this buffer has been added in response to the authority’s failure to deliver against its Housing Delivery Test figure and is not a commitment from B&MS to facilitate any other ISPA authority to meet its housing requirement should it be required. This is contrary to the spirit of the ISPA and national government guidance. IBC consider that the B&MS joint plan should better reflect this commitment in how they describe their buffer.
1.18 **Spatial Strategy**

Policy SP04 show the broad distribution of additional housing provision across the two Districts. New housing growth has been focussed around key sites around the Ipswich Fringe, settlements along the A14/mainline railways corridor, A12/mainline railway corridor and settlements requiring new schools or healthcare sites.

1.19 A number of new homes are to be located around the Ipswich Fringe. This will inevitably impact on facilities and services in Ipswich and it will be vital for B&MS to work closely with IBC and Suffolk County Council to secure appropriate mitigation and financial contributions, on allocated sites towards key services and infrastructure, such as schools, libraries, highway improvements, improved cycle networks, green links, and air quality mitigation measures that may be required within Ipswich.

2. **Part 2 Non-Strategic Delivery Policies**

2.1 **SP30 Safe, Sustainable and Active Travel**

There are a number of allocated sites in the B&MS joint local plan in the Ipswich Fringe and residents of these sites are likely to travel into Ipswich to make use of the services, facilities and jobs on offer in the town. As identified above, source apportionment data for Ipswich shows that 27 per cent of emissions can be attributed to vehicles from Babergh and Mid Suffolk travelling to Ipswich for work and recreation. The Council would welcome efforts to ensure sustainable travel choices are encouraged as part of new developments, particularly at the Ipswich Fringe so as not to negatively impact air quality in Ipswich.

2.2 **LP13 Retail**

Town centres continue to have an important role in the delivery of retail development. Reference is made in the consultation document that a high proportion of retail expenditure, particularly on comparison goods, is ‘leaked’ to nearby larger towns including Ipswich.

2.3 As part of the agreed Statement of Common Ground (V4) signed by the ISPA authorities, there is agreement to recognise the county town of Ipswich and the regional role of Ipswich town centre in relation to the retail policies (G1). At G2 of the SoCG it is recognised that in the Suffolk Coastal Final Draft Local Plan (policy SCLP4.8) requires proposals for retail uses outside of town centres to demonstrate no significant adverse impact on Ipswich town centre.

2.4 IBC consider that it is important that the B&MS joint Local Plan identifies the role of Copdock as an out of town shopping area and the need to ensure development at Copdock does not impact negatively on Ipswich town centre, and therefore reflecting the requirements of the NPPF wider retail hierarchy.
2.6  **Chapter 15 Environment**

The Borough welcomes the positive approach adopted by B&MS with respect to the natural environment. It has been a partner in the preparation of The Draft Suffolk Coast European Sites Recreational Disturbance and Avoidance and Mitigations Strategy (RAMS) with Ipswich and East Suffolk. However, the Borough is conscious that flora and fauna do not respect local authority boundaries and therefore a commitment to a joined up approach to addressing biodiversity needs such as wildlife corridors would be welcomed. This is not reflected in the current Regulation 18 Draft Plan.

2.7  **Air Quality**

The Council welcomes the clear stance adopted by B&MS on air quality. However, IBC consider that it is important that the plan also recognises the impact of development within B&MS on Ipswich.

3.  **Part 3 Allocated Sites**

The Ipswich Fringe is a prominent location in the B&MS joint plan for new development. The following site allocations are considered in this representation given their relationship to Ipswich Borough.

3.1  **LA016 Land West of Bourne Hill, Wherstead**

This is a new site allocation for 75 dwellings on the edge of Ipswich. Wherstead is classified as a hamlet and is an area with limited public transport and no local services. There is some concern about the sustainability of this location for new development as residents will be reliant on private vehicles to access key services. In the preferred options joint plan the site sheet does not recognise the need for a travel plan or recognise the close relationship the site has to Ipswich. The Borough considers that the scale of development proposed is too large for this location on sustainability grounds. IBC considers that it is important that the impact on Ipswich residents needs to be mitigated and acknowledged by showing changes to the Site Sheet.

3.2  **LA008 Land south east of Back Lane, Copdock and Washbrook**

Site allocation LA008 allocated 13ha of land for approximately 226 dwellings. The site lies south of Ipswich, within the Ipswich Fringe and is a new allocation. This site will have impact on existing congestion around the A14 junction which is already recognised by Suffolk County Council as an issue requiring an application for Government funding to help mitigate this over the plan period. It is important that the scale of this proposed site does not adversely impact on this A14 junction and mitigation is included.
3.3 **LA013 – Land north of the A1071, Sproughton / LA014 - Land at Poplar Lane, Sproughton**

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.

LA014 already benefits from outline planning permission for 475 dwellings and 4ha of employment land and a proposed school.

LA013 is subject to a planning application (DC/19/02571) for 800 dwellings which is pending. IBC have provided comments on the application. IBC are unclear why the number of dwellings proposed differs between the application and site sheet. Given the proximity of the site to the IBC boundary Chantry Park, and the nature and scale of the development it is considered that the impact on Ipswich should be assessed and appropriate mitigation identified within the site sheet, and secured as part of any planning permission that might be granted.

3.4 **LA012 – Land north of Burstall Lane and west of B1113, Sproughton**

This is a new allocation for 75 dwellings to the west of Sproughton. The site sheets identifies a contribution towards junction improvements on the A1071 which IBC would support.

3.5 **LA006 - Land south of Fitzgerald Road, Bramford / LA007 – Land east of The Street, Bramford**

Site allocation LA006 allocates 4.18ha of land for approximately 100 dwellings. The site lies south of Bramford, within the Ipswich Fringe and is a new allocation.

Site allocation LA007 allocates 9.3ha of land for approximately 195 dwellings. This site lies to the north east of Bramford, within the Ipswich Fringe and is also a new allocation.

The site sheets for both sites identify contributions towards primary school, healthcare, household waste recycling, junction and pedestrian improvements. IBC welcomes the commitment to secure contributions to offset the impact of these developments.

3.6 **LA018 – Sproughton Enterprise Park/Former Sugar Beet Factory Site**

Sproughton Enterprise Park continues to be allocated for industrial B1/B2 and B8 use. This Site is owned by Ipswich Borough and the authority is seeking to expand the site so this is welcomed.
Ipswich Borough Council looks forward to continued joint working on strategic cross boundary matters with Babergh & Mid Suffolk through the Ipswich Strategic Planning Area board.

Yours sincerely,

Martyn Fulcher MRTPI
Head of Development
Ipswich Borough Council