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Your ref:
Our ref:
Date: 2nd March 2020
Please ask for: Andrea McMillan
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Dear Mr Hone,

Consultation on Ipswich Borough Local Plan Review Final Draft

East Suffolk Council (The Council) would like to take the opportunity to express its support for the Ipswich Borough Council (IBC) Local Plan Review Final Draft, which comprises the Core Strategy and Policies Review Final Draft and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Review Final Draft. The Council provided comments on the Ipswich Local Plan Review Preferred Options on the 12th March 2019.

The Ipswich Strategic Planning Area (ISPA) Board, of which the Council is a member, involves ongoing work between the member authorities of the ISPA Board in relation to addressing strategic cross boundary planning matters. The Council is committed to and supportive of this collaborative working, as demonstrated through the production of the Statement of Common Ground for the ISPA, which outlines the joint working undertaken and the outcomes in relation to planning for environmental, economic, housing and infrastructural matters. These matters have been taken forward through policies contained in the Suffolk Coastal Final Draft Local Plan, currently undergoing Examination, and policies ISPA1 – ISPA4 in the IBC Local Plan Review Final Draft are broadly similar. Policy SCLP2.1 Growth in the Ipswich Strategic Planning Area of the Suffolk Coastal Final Draft Local Plan (January 2019) seeks to support the continued role of Ipswich as the County Town.

As a reminder, it should be noted that from 1st April 2019 the new East Suffolk Council was created, and references to Suffolk Coastal District Council in the Ipswich Local Plan Final Draft should be updated accordingly.

The Council does not raise any issues in relation to the overall soundness of the Ipswich Local Plan, however, would wish to make comments in relation to parts of the Plan as set out below.

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Policy ISPA2: Strategic Infrastructure Priorities

The Council would like to highlight that the equivalent policy in the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.2) includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace. It is suggested that policy ISPA2 should also include reference to these strategic infrastructure priorities. This would align the policy with the Statement of Common Ground between the ISPA authorities which specifically references police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace (SANG) as other strategic infrastructure priorities. Ipswich Borough Council will be aware that, following publication of the Ipswich Local Plan Review Final Draft, there have been recent announcements relating to the ceasing of the Ipswich Northern Routes project.

Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species

The Council is supportive of the commitment to address the issue of recreational impact avoidance and mitigation through continued joint working. This policy reflects the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.3 'Cross-boundary mitigation of effects on Protected Habitats') and is considered by the Council to be sound. The Council does however set out further related comments below in relation to Policy DM8: Natural Environment.

Policy ISPA4: Cross Boundary Working to Deliver Sites and Policy CS2: The Location and Nature of Development

The Council is supportive of the general principles of these policies regarding the development of land at the northern end of Humber Doucy Lane. This approach is complementary of the Suffolk Coastal Final Draft Local Plan policy for Land at Humber Doucy Lane (Policy SCLP12.24), and along with other policies and site allocations in the Ipswich Local Plan Final Draft contributes towards the outcome outlined within the Statement of Common Ground of each local planning authority meeting housing needs within their own area. In particular, the Council supports the 30% affordable housing requirement of Policy ISPA4 which appropriately complements the affordable housing policy (SCLP5.10 'Affordable Housing on Residential Developments') in the Suffolk Coastal Final Draft Plan.

It is suggested that policy for development at the northern end of Humber Doucy Lane references the maintenance of separation between Ipswich and the surrounding settlements, for consistency with Policy DM11 'Countryside'. It is noted that Policy ISPA4 infers that SANGs will be required on both sides of the Borough boundary for the Humber Doucy Lane site. For clarity and to enable the provision for any SANG to be considered through the project level Habitats Regulations Assessment, and to be reflective of the plan level Habitats Regulations Assessment, it is considered that the Policy could provide an appropriate level of flexibility by not specifying that SANG be located on both sides of the Borough boundary.

Also, as a general point, reference to SANGs as Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces to reflect the meaning of the term SANGs.

Policy CS10: Ipswich Garden Suburb

The Council welcomes the protection of the physical separation between Ipswich and Westerfield village. Such protection accords with Policy SCLP10.5 'Settlement Coalescence' of the Suffolk Coastal Final Draft Local Plan relating to settlement coalescence which aims to prevent the development of land between settlements that leads to urbanising effects between settlements. Policy CS10 also facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land in the north of Ipswich Garden Suburb as part of the country park (Policy SCLP12.23 'Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park)'). This approach is considered by the Council to be sound.

Policy CS11: Gypsy and Traveller Accommodation

The Council is supportive of the Ipswich Local Plan in seeking to identify land within the Borough boundary for permanent Gypsy and Traveller pitches to meet its identified need, and would support the Borough Council in looking to identify sites in the Borough to meet the need. The ISPA Statement of Common Ground states that each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. The Statement of Common Ground goes on to state that where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

The Council notes that the Policy includes a reference to developing a short stay site between Ipswich and Felixstowe. Whilst this approach was identified in the adopted IBC Core Strategy and Policies DPD (2017), the authorities across Suffolk are working together to deliver sites to meet the needs identified in the Accommodation Needs Assessment (this identified a need for two to three sites in the study area which covers the ISPA authorities plus the former Waveney part of East Suffolk). The policy should appropriately apply some flexibility in meeting needs for short stay stopping sites in order to be effective and consistent with the approach outlined in the Statement of Common Ground.

Policy CS16: Green Infrastructure, Sport and Recreation

The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park within the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint work being undertaken between the Council and IBC. The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular, the establishment of a green trail around Ipswich is reflected in Policy SCLP12.24 'Land at Humber Doucy Lane' in the Suffolk Coastal Final Draft Local Plan.

Policy CS17: Delivering Infrastructure and Policy CS20: Key Transport Proposals

The Council is supportive of IBC's positive commitment to the delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. This is consistent with the ISPA Statement of Common Ground which sets out a commitment to produce a mitigation and funding strategy to mitigate the highways impacts of growth across the ISPA authorities. The potential measures outlined in Policy CS20 are consistent with the potential measures outlined in Suffolk County Council's Transport Mitigation Strategy.

The Council notes that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the Council notes the potential provision for park and ride facilities under site allocation IP152 Airport Farm Kennels and under policy SP9 Safeguarding Land for Transport Infrastructure, improvements to cycling and walking provision under policy SP15 and limiting congestion (along with supporting the economy) under Policy SP17 Town Centre Car Parking.

The categories of infrastructure detailed in Policy CS17 are broadly in line with the infrastructure commitments in Policy SCLP2.2 'Strategic Infrastructure Priorities' of the Suffolk Coastal Final Draft Local Plan. Where infrastructure projects require cross-boundary cooperation, they have been identified in the Annex of the ISPA Statement of Common Ground. These projects are appropriately identified in both the Infrastructure Delivery Framework of the Suffolk Coastal Final Draft Local Plan and Table 8A of the IBC Final Draft Plan.

The Council notes that Policy CS17 refers to infrastructure to be secured from new developments including early years provision. This is consistent with the Annex of the ISPA Statement of Common Ground which identifies the provision of early years provision in north east Ipswich. However, it is not clear in Table 8A of the plan whether early years provision in north east Ipswich has been identified as an infrastructure priority, consistent with the ISPA Statement of Common Ground. The Council has included as a criterion within Policy SCLP12.24 'Land at Humber Doucy Lane' of its Final Draft Local Plan provision of an early years setting on site, if needed. To be effective it is recommended that this is replicated in Policy ISPA4 of the Ipswich Local Plan Review Final Draft.

Policy DM3: Air Quality

The Council notes IBC's air quality screening study, as part of the new evidence base documents for the IBC Local Plan Review. The air quality screening has considered growth across the ISPA and the Council would note that there are potential linkages with mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy as outlined above.

Policy DM8: The Natural Environment

The Council is supportive of this policy and the approach it takes. However, the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP10.1 'Biodiversity and Geodiversity') refers to the Recreational Avoidance and Mitigation Strategy (RAMS), and as such provides a development management policy approach to implementing the strategy which has been worked

up on a cross-boundary basis. In this respect, to be effective Policy DM8 could be strengthened through reference to securing contributions to facilitate the implementation of the strategy.

The Council would wish to be notified of progress of the Ipswich Local Plan Review including the submission, the publication of the Inspector's report and the adoption of the Plan. We trust our comments above are helpful but please do not hesitate to contact us should you require any clarification on the points raised.

Yours Sincerely,

Andrea McMillan | Principal Planner
East Suffolk Council

