

Planning Policy Team  
Ipswich Borough Council

Please ask for:	Robert Hobbs
Email:	
Direct line:	
Our reference:	
Your reference:	

(sent via e-mail to [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk))

2<sup>nd</sup> March 2020

Dear Sir or Madam

**Regulation 19 consultation on Ipswich Local Plan Review Final Draft (January 2020)**

Thank you for consulting us on your Ipswich Local Plan Review Final Draft (January 2020). Babergh and Mid Suffolk District Councils have considered the Plan and have produced a joint response as attached focusing on key issues.

The Councils are pleased to see the Ipswich Local Plan making provision for housing growth which will contribute to the overall housing market area needs and are committed to cross boundary strategic planning across the Ipswich Strategic Planning Area, which covers the Ipswich Housing Market Area. Furthermore, Babergh and Mid Suffolk District Councils have signed an Ipswich Strategic Planning Area Statement of Common Ground (October 2019 – signed January 2020), with Ipswich Borough Council, East Suffolk Council and Suffolk County Council.

However, there are some areas of concern identified, in particular regarding policies CS2, CS7 and CS11 that the Councils wish to draw attention to. There are also areas of the Plan, that the Councils wish to express support.

Yours faithfully

Robert Hobbs  
Corporate Manager – Strategic Planning



---

Babergh and Mid Suffolk District Councils  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations  
2012 (Regulation 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	Ipswich Borough Council Local Plan: Core Strategy and Policies Development Plan Document Review – Final Draft (January 2020)
Please return this comments form to:	<a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2 <sup>nd</sup> March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	Mr	
First name	Robert	
Last name	Hobbs	
Job title ( <i>where relevant</i> )	Corporate Manager – Strategic Planning	
Organisation ( <i>where relevant</i> )	Babergh and Mid Suffolk District Councils	
Address ( <i>Please include post code</i> )	Endeavour House 8 Russell Road Ipswich Suffolk IP1 2BX	
E-mail		
Telephone No.	-	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (and client if you are an agent):	Babergh and Mid Suffolk District Councils
---	---

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategy Policy CS2 and supporting paragraph 8.58	<p>Object to soundness of the Local Plan.</p> <p>Whilst Babergh and Mid Suffolk District Councils will work with Ipswich Borough Council and East Suffolk Council through the Ipswich Strategic Planning Area (ISPA) Board to address housing need and delivery within the Ipswich Housing Market Area (IHMA), the Councils object to the following statement as unsound:</p> <p><i>‘Later in the plan period after 2031, the Council’s housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough’s objectively assessed housing need.’</i></p> <p>All ISPA authorities in the Statement of Common Ground version 5 (October 2019 – signed January 2020) agree in paragraph C3 of the document that:</p> <p><i>‘Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority’s boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken’.</i></p> <p>Furthermore, as stated in paragraph C3:</p> <p><i>‘Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, 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. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.’</i></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>Therefore, before an assumption is made that later in the plan period, housing land supply opportunities in Ipswich Borough will be limited, a comprehensive regeneration and asset strategy needs to be undertaken to exhaust all other options. For example, there are surface car parks in Ipswich Borough that could be redeveloped for housing or re-configured for multi-storey car parks making a more effective use of land. The emerging Ipswich Local Plan in policy CS5: Improving Accessibility, acknowledges the need to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport. Therefore, through measures contained in the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, it should be possible to rationalise / make better use of the amount of car parking required in Ipswich.</p> <p>As stated in paragraph 8.96 of the emerging Ipswich Local Plan, <i>'The Local Transport Plan is under review and provides the opportunity for the next package of sustainable travel measures to be identified and implemented.'</i> Furthermore, paragraph 6.22 notes that town centre improvements will encourage modal shift to transport, cycling and walking.</p> <p>Paragraph 8.97 also notes the Council is developing a parking strategy to address the quantity and quality of car parking provision in the town, which we would have expected to have been produced before the assertion was made in paragraph 8.58 of limited housing land supply opportunities.</p> <p>Additionally, a comment was made to the previous Regulation 18 consultation in March 2019 undertaken by Ipswich Borough Council, where Babergh and Mid Suffolk District Councils sought a re-phrasing of paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan. This paragraph remains unchanged. A similar amendment should be made to policy CS2 to acknowledge that local planning authorities within the Ipswich housing market area will plan to meet the needs of their own areas, which was our comment in March 2019, and which also has not been made. We note paragraph 8.11 does at least acknowledge the starting point for each authority will be to meet their own needs within their own boundary, however we request paragraph 8.7 and policy CS2 are amended accordingly.</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Your name or organisation	Babergh and Mid Suffolk District Councils
Core Strategy Policy CS7	<p>Object to soundness of the Local Plan.</p> <p>Policy CS7 states 'In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 dwellings. This excludes the Opportunity Sites identified through policy SP4.'</p> <p>This statement contradicts the text in paragraph 8.58:</p> <p><i>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.'</i></p> <p>Policy CS7 also states following identification of the housing requirement that <i>'The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area'</i>. Whilst it is correct the Ipswich Housing Market Area authorities discuss the housing requirement for each local planning authority in the IHMA through the ISPA Board, before considering any implications for not being able to meet need, the text in paragraph C3 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) needs to be adhered to. The text is quoted below:</p> <p><i>'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken.'</i></p> <p><i>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, 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. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.'</i></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
Core Strategy Paragraph 2.15	Support the spatial strategy for continued urban regeneration in central Ipswich and development of the Ipswich Garden Suburb and land at Humber Doucy Lane.
Core Strategy Policy CS10	Support the delivery of homes at the Ipswich Garden Suburb and associated infrastructure, in particular the 1,200-place secondary school. It is essential that this secondary school is delivered alongside the housing.
Core Strategy Policy CS11 and paragraph 8.141	<p>Object to soundness of the Local Plan.</p> <p>Object to wording in Paragraph 8.141 and Policy CS11.</p> <p>Whilst work is being undertaken with neighbouring authorities on short-stay provision within the Ipswich Strategic Planning Area as part of wider work in Suffolk, no contact has been made with Babergh and Mid Suffolk District Councils regarding permanent provision.</p> <p>It is identified that Ipswich Borough Council need to find 27 permanent pitches to 2036. Paragraph C4 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) states:</p> <p><i>'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. 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.'</i></p>
Core Strategy Policy CS17 and paragraph 8.218.  Core Strategy Paragraph 8.207 supporting Policy CS16	Support the collaborative working on the Recreational disturbance Avoidance and Mitigation Strategy (RAMS), although need to ensure that any RAMS contributions collected are spent to mitigate the impact from the development that has generated the need for the RAMS contribution.



<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Your name or organisation</b>	Babergh and Mid Suffolk District Councils
<b>Core Strategy Paragraph 8.240</b>	<p>Object to soundness of the Local Plan.</p> <p>In respect of a 'Transport Mitigation Strategy' for the Ipswich Strategic Planning Area, this paragraph states: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board'.</p> <p>Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'.</p>
<b>Core Strategy Paragraphs 8.249 and 8.250</b>	<p>Object to soundness of the Local Plan.</p> <p>Object to reference to an Ipswich Northern Route as this is no longer supported by Babergh or Mid Suffolk District Councils. However, appreciate that the decision by Suffolk County Council to not pursue funding for an Ipswich Northern Route was made after the emerging Ipswich Local Plan was published for consultation.</p>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

- The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**  Yes
- Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  Yes
- Adoption of the Ipswich Local Plan Review.**  Yes

## **PRIVACY NOTICE**

**Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).**

**As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.**

**Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.**

**The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.**