our ref

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31st May 2011

Dear Mrs Feeney

Joint Working on Planning Policy Matters in the Ipswich Policy Area

I refer to your letter dated 15th March 2011 - which followed earlier correspondence on the same subject – to Mike Tee, Head of Planning, Transport and Regeneration at Ipswich Borough Council.

This letter that sets out the position of Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council on joint working on planning matters. It has been produced following discussions with officers at the other three authorities – letters of confirmation from them are attached and / or are anticipated to follow shortly. This highlights our track record of working on such matters together over many decades and sets out some of the things we do together currently and how we anticipate working together in the future.

It has long been recognised that there is an inter-dependence between Ipswich Borough and the neighbouring three authorities in terms of development and access to facilities. The tight urban boundaries of the Borough make this inevitable. People often live in one area and work in another or live in one and do some of their leisure activities in another. The transport and educational systems are similarly inter-linked. This is not a unique Ipswich position - it is commonplace across much of the country.

Over many decades this has been reflected within various versions of the Suffolk Structure Plan via the development of the Ipswich Policy Area and the attribution of housing figures to that Area. A map of the Ipswich Policy Area can be seen at page 142 of the submission version of Ipswich's Core Strategy. Whilst it would be fair to say that our respective Councils have from time to time had different views on development issues around Ipswich, we have continued to work together at officer and political level to ensure agreements are reached and developments and planning policy move forward in an appropriate manner - which culminated in the examination and subsequent adoption process of each Structure Plan.

Clearly the last government abolished the Structure Plan process and gave far greater weight to the regional level via the Regional Spatial Strategy. Again the East of England Regional Spatial Strategy recognised this inter-dependence between our respective areas by the way it dealt with both housing and jobs numbers. In addition it incorporated us all within the Haven Gateway sub-region. It should be noted that the Regional Spatial Strategy did not require any form of formal joint working on a single

Core Strategy - indeed we are of the understanding, in any event, that that was not something it would have been appropriate for Regional Strategies to do as any such move would be a matter for local political discretion. It is perhaps worth quoting the Regional Examination report on housing growth figures in and around Ipswich since it is relevant to this cross-boundary point and exemplifies and reinforces the long-recognition of our inter-dependencies:

> 5.26 *The issues for the various districts need to be considered separately. For Ipswich, which is tightly contained by the administrative boundary, the proposed provision of 15,400 dwellings appears to correspond closely with the capacity that is identified. The main direction for growth to the north of Ipswich has been the subject of previous consideration through the Structure and Local Plans, but some developers called for it to be specifically identified in the RSS, while local groups opposed to the development wished it to be ruled out. We consider that the distribution of development within Ipswich should be determined though the LDD process. The full growth potential of Ipswich goes beyond the Borough's administrative boundaries, and the draft Plan identifies quantities of housing within Mid-Suffolk, Suffolk Coastal and Babergh which, together with the Ipswich provision would make up to a total of some 20,000 additional dwellings in the period 2001-2021. This perpetuates the approach of the "Ipswich Policy Area" (IPA) in the Suffolk Structure Plan.*

Whilst discussions at Policy Area level continue, these occur in parallel with discussions within the auspices of the Haven Gateway Partnership (HGP). The HGP is funded by all our authorities and its board includes portfolio holder and senior officer representatives from all our authorities. As an example of our collective joint working and ability to support each other, significant sums of Growth Point monies were secured and thereafter allocated by discussion, collaboration and inevitably to a degree compromise. But such allocations ably demonstrate our ability to get on well together and to make decisions that benefit the whole.

In terms of the current work on Core Strategies it is important to recognise that it is inevitable that these documents will be produced to different time-lines and that absolute certainty about what all authorities are doing cannot be guaranteed. However in summary the position is as follows:

Babergh District Council:

- Local Plan Adopted in 2006
- LDF Core Strategy Options for Growth Consultation in 2010

Ipswich Borough Council

- Local Plan Adopted in 1997
- LDF Core Strategy Examination Underway

Mid Suffolk District Council

- Mid Suffolk Local Plan Adopted 1998
- LDF Core Strategy Adopted in 2008

Suffolk Coastal District Council

- Local Plan incorporating first amendment Adopted in 2001. Updated in relation to affordable housing 2006.
- Interim Core Strategy - adopted as a material consideration - March 2010.
- Reviewed Core Strategy (a draft document) Consultation in November 2010

Equally it needs to be recognised that Ipswich's Core Strategy cannot pre-determine the contents of the Core Strategy of a neighbouring Authority. We note your interest in this issue and in particular the jobs numbers and the approach to provision for Gypsies and Travellers contained within the submission Ipswich Core Strategy and would draw your attention to the fact that:

(a) this is not a new position - it has been in the Ipswich documents since submission in March 2010. Therefore we are somewhat surprised you have chosen to raise it at this comparatively late stage. Having said that we recognise that the changed (and, arguably evolving) position with regard to the status of the Regional Spatial Strategy might be argued to make the issue more complex. However it is a fact, as you observed at the Pre-Hearing Meeting, that the Regional Spatial Strategy remains part of the development plan and it gives a Suffolk Haven Gateway jobs figure that all authorities must conform generally with;

(b) it is our view that the approach taken by Ipswich Borough Council does generally conform, and the draft strategies for both Babergh and Suffolk Coastal district council's refer to, the part they play in this inter-relationship with Ipswich – as does the Mid Suffolk adopted Core Strategy;

(c) the topic paper you requested from Ipswich Borough Council that was submitted on 10th May 2011 demonstrates that there is adequate land within the Borough boundary to deliver around 20,000 jobs including some non-B class jobs, and the major sites listed below (f) outside the Borough boundary will deliver many thousands more, when developed, to comfortably exceed the target set out within the Ipswich Strategy;

(d) all of the other three authorities were consulted at each stage of the process - and none has chosen to object to the Ipswich Strategy on matters of jobs or Gypsies and travellers;

(e) we remain committed to joint working and would also draw your attention to recent government statements on this - e.g. the duty in this regard referred to within the Localism Bill and the ministerial statement 'Planning for Growth' made by the Rt Hon Greg Clarke MP on 23rd March 2011;

(f) there are a number of 'strategic' employment sites on the edge of Ipswich that our respective authorities have a long track record of supporting for employment purposes. Whilst one can never say they will definitely be developed for employment purposes, we are not aware of any current plans within our authorities to change our views on the appropriate uses for these sites. In summary these sites are:

    (i) Former British Sugar site (Babergh District Council): A 36ha site suited to various employment uses and with good road access. This site is allocated for employment purposes within the adopted Babergh Local Plan. In recent years it has been subject of a residential led planning application which was refused by Babergh District Council who then successfully defended their position – which was largely about it being an employment site and not a residential site – at appeal (a public inquiry);

    (ii) Ransomes (Suffolk Coastal / Ipswich): A 13.53ha site in Suffolk Coastal District Council adjacent to the existing and on-going Ransomes development of 94 ha within Ipswich Borough. This site is allocated in the adopted Suffolk Coastal Local Plan and is suited to various employment uses and has good road access;

(iii) Adastral Park (Suffolk Coastal): A 6ha site suited to office use with good road access. This site is the subject of a mixed use planning application currently before the Council;

(iv) Former Crane site (Ipswich): A 16.74ha site within Ipswich Borough Council suited to mixed employment uses with good road access. It is anticipated that the Borough Council will receive a planning application for an employment (10ha plus) led scheme in the next few months. Policy CS13 of the Ipswich Core Strategy deals with this site;

(v) Snoasis (Mid Suffolk): This 123ha site has planning permission for a national scale leisure / winter sports led scheme. Relevant job estimates are 3,500 during the construction phase and 1,800 when the development is completed. The site is effectively 'half in' and 'half out' of the Ipswich Policy Area. A bid is being produced for some related infrastructure funding and the joint working on this between authorities will be coordinated through the HGP.

(g) In addition, other employment opportunities will be available within the Ipswich Policy area over the rest of the Strategy period. However it would not be appropriate to detail specific and comparatively small sites within an Ipswich Core Strategy LDF process that have not been through the proper consultation processes in other areas. Whilst this comment would be relevant to small sites within Ipswich it is particularly true of small sites in the neighbouring districts.

However, as an example, Ashfield Land are promoting for employment purposes a site of approximately 26 ha that straddles the Mid Suffolk / Ipswich boundary). It is understood that that site could, if supported and thereafter developed out, provide in the region of 1,500 new jobs. Alternatively Ipswich Borough own 2.2ha of employment land in Babergh at IP8 (London Road) that is available for employment uses.

(h) In terms of Gypsy and Traveller issues, the existing Ipswich Core Strategy sets out a criteria based approach to the issue. There are appropriate groupings to discuss relevant issues and site selection matters would be a matter for individual local authorities to resolve within their site allocations documents and development control processes. Within Ipswich Borough there is a significant gypsy and traveller site at West Meadows run by Suffolk County Council – arguably there is space to expand this but this might not be the most appropriate option bearing in mind site management and locational issues. It would seem sensible to monitor progress on this issue and to review plans, in due course, as appropriate.

(i) Mid Suffolk have previously given evidence to their Core Strategy Inspector that there are sufficient opportunities elsewhere in the district that the dedication of the Snoasis and related sites in the area, including the Scotts site in Paper Mill Lane, Bramford (also within the IPA) will not be harmful to the aims and objectives of the employment element of their Core Strategy. Mid Suffolk is keen to point out that jobs in the Ipswich Policy Area can still help to reduce the existing level of out-commuting from its district, thus meeting a key core strategy aim.

Finally, if the situation merits it in the future, we believe our authorities would revisit our joint working arrangements with a view to assessing whether new ways of working together should be introduced. However, we do not feel this is required at the moment because we are of the view that the mechanisms we currently have in place will ensure that enough land is allocated and thereafter that we work together to help deliver key schemes and major sites.

Yours sincerely

Russell Williams
Chief Executive