

**Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council,
Suffolk Coastal District Council and Suffolk County Council**

**Statement of Common Ground in relation to Strategic Cross Boundary Planning
Matters in the Ipswich Strategic Planning Area**

Working Draft (July 2018)

This working draft Statement of Common Ground is published by Suffolk Coastal District Council as a supporting document to the consultation on the First Draft Local Plan which is being carried out between 20th July and 14th September 2018. This follows the guidance contained in the March 2018 proposed revisions to the Planning Practice Guidance (PPG) which states that Statements of Common Ground should be made available throughout the plan making process. This Statement of Common Ground has been drafted following the draft guidance contained in the PPG. It is expected that the final revisions to the PPG will be published in late July 2018 and will be taken into account in future revisions of this Statement.

Note that at this stage the Statement of Common Ground is a working draft, reflecting the fact that co-operation is ongoing in relation to the issues identified and this will evolve as plan making progresses across all four local planning authorities. It is intended that further iterations of the draft Statement of Common Ground will be published at key stages of plan making in relation to each of the local planning authorities. This working draft has been informed through meetings of the Ipswich Strategic Planning Area Board.

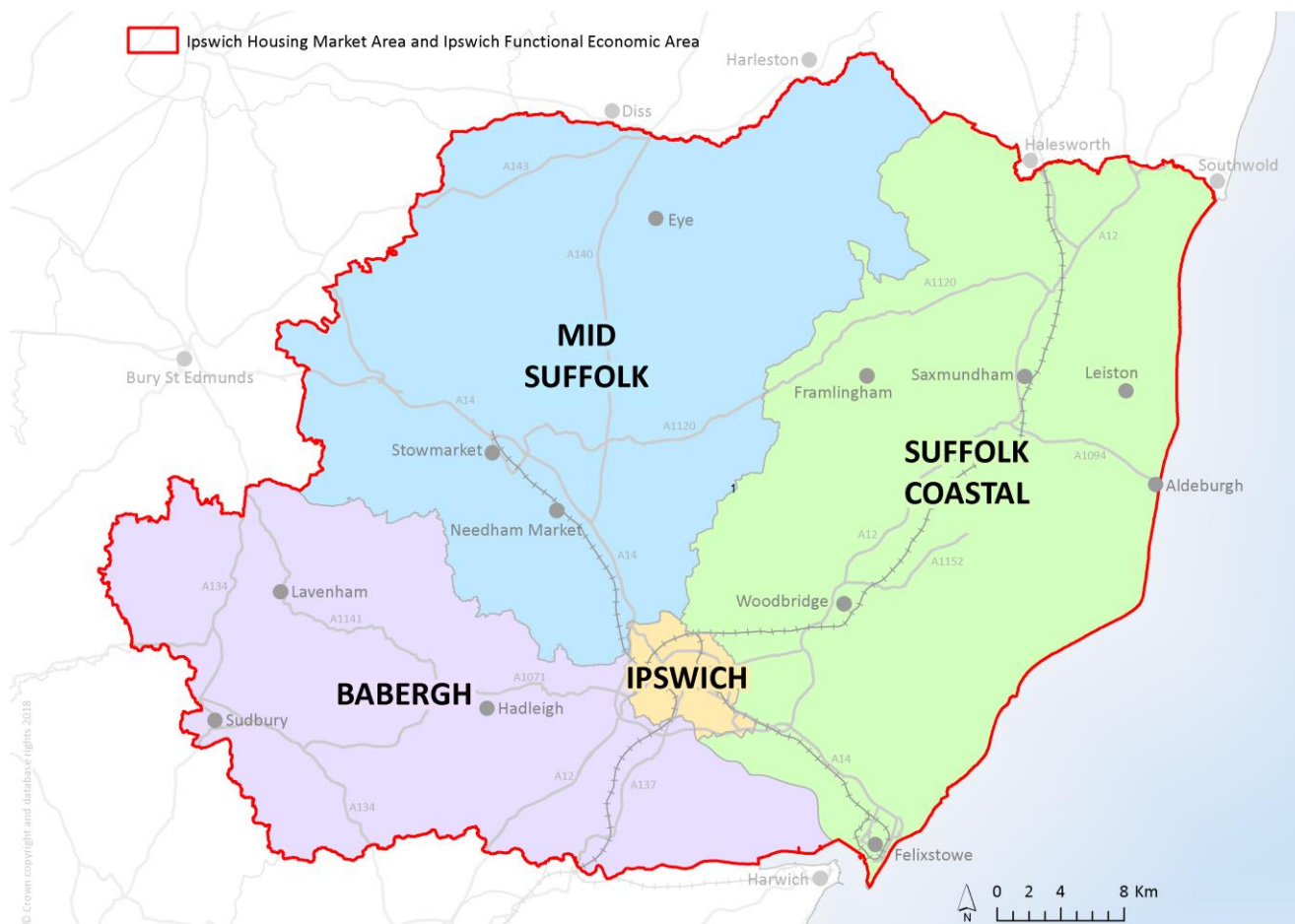
1. Area covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council (the Ipswich Housing Market Area and Ipswich Functional Economic Area), as shown on the map overleaf.

2. Authorities covered by the Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council.
- Suffolk County Council is signatory in relation to matters which relate to County Council responsibilities, including as mineral and waste planning authority.



Ipswich Strategic Planning Area

3. Purpose of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters.

The draft revisions to the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance published for consultation in March 2018 require local planning authorities to produce a Statement of Common Ground as a written record of progress made on the planning for strategic matters across local authority boundaries.

This Statement of Common Ground will support the production of Local Plans in the Ipswich Housing Market Area by:

- Setting out those matters which are strategic matters in relation to the production of Local Plans;
- Outlining agreements and outcomes in relation to those strategic matters;
- Reflecting statutory and policy requirements re Duty to Co-operate.

4. Governance arrangements

The Ipswich Strategic Planning Area Board (ISPA Board) (formerly the Ipswich Policy Area Board) consists of Members from each of the four local planning authorities and

Suffolk County Council. The Terms of Reference were revised in March 2018, including to recognise that an appropriate geography for the Board is the extent of the Ipswich Housing Market Area / Ipswich Functional Economic Area. The Board provides a mechanism for the five local authorities to work together on the production of evidence and the coordination of housing and employment growth requirements and infrastructure delivery where this relates to strategic cross-boundary matters. This can be reported back to each District and Borough Council who will themselves take formal decisions regarding the content of their own Local Plans, through the relevant procedures at each stage of local plan production.

The ISPA Board Terms of Reference and Action Notes from the meetings can be viewed at www.ipswich.gov.uk/content/ipswich-strategic-planning-area.

5. Strategic matters being addressed

The sections below detail the strategic cross-boundary matters that are addressed by this statement.

The local planning authorities may produce other Statements of Common Ground with other bodies where necessary, and with other local authorities who share a common boundary and where there are strategic cross-boundary matters.

Local Plan format

A. Alignment of timetables

Background

The local planning authorities are producing plans as follows:

- Babergh and Mid Suffolk Joint Local Plan
- Ipswich Local Plan
- Suffolk Coastal Local Plan

As the local plans cover one Housing Market Area and one Functional Economic Area, and share joint evidence in this respect, it is considered appropriate that the plans cover the same end date of 2036 and are produced to timescales which are aligned as far as is possible.

Evidence

Broad alignment of timescales will be set out in the authorities' Local Development Schemes:

- Babergh and Mid Suffolk Local Development Scheme
- Ipswich Local Development Scheme (October 2015)
- Suffolk Coastal Local Development Scheme (October 2015)

In relation to the time period to be covered by the local plans, the proposed standard methodology for calculating housing need will set a consistent base date and method for

calculating housing need in local plans. The consultation ‘Planning for the Right Homes in the Right Places’ (September 2017) (and carried forward in the proposed revisions to the NPPF and the Planning Practice Guidance) identified a base date of 2016. The Strategic Housing Market Assessment (2017) and Employment Land Needs Assessment (2016) adopt an end date of 2036.

Process of reaching outcomes and agreements

As per evidence above

Outcomes and agreements

A1) It is agreed that the Local Plans will adopt an end date of 2036, and will adopt a base date consistent with the standard method.

Arrangements for necessary ongoing co-operation

Authorities to work closely through the ISPA Board and associated officer meetings to continue to align as far as possible.

B. Strategic Policies and Vision for the ISPA

Background

Babergh and Mid Suffolk Districts are producing a Joint Local Plan, reflecting their Council-wide arrangements for joint working. Ipswich Borough Council and Suffolk Coastal District Council are each producing a local plan. Reflecting the agreements under the Duty to Co-operate as detailed in this statement, the authorities recognise the benefits and clarity afforded through developing strategic policies that respond to the strategic planning matters relevant to the wider Ipswich Housing Market (HMA) Area and Functional Economic Area (FEA). The ISPA Board is also working towards a broader vision for the HMA and FEA.

Evidence

Evidence referred to in the sections below.

Process of reaching outcomes and agreements

The ISPA Board considered the options for incorporating either shared or complementary policies in the respective local plans at its meetings on 26.3.2018, 23.4.2018 and 30.5.2018.

Outcomes and agreements

B1)

Vision

A vision for the ISPA is being developed based upon the following:

Across the Ipswich Strategic Planning Area, we are being ambitious about delivering economic growth, improving infrastructure and boosting the supply and mix of homes. The vision will incorporate aspirations to seek to deliver:

- Identifiable economy focussed around Ipswich as county town, the energy sector/coast, opportunities arising from the University of Suffolk and the international significance of the Port of Felixstowe;
- Connectivity with the rest of the east of England and the UK via the A14/A12/rail connections, and a commitment to sustainable, integrated travel;
- Healthy communities supported by the provision of a mix of housing;
- Distinctive urban and rural environments contribute towards high quality of life.

B2) The four local planning authorities' local plans will reflect the outcomes in this Statement of Common Ground, including in relation to an agreed broader vision for the Ipswich Strategic Planning Area. The Suffolk Coastal First Draft Local Plan incorporates policies which consider strategic matters related to housing and employment growth, infrastructure provision and mitigation of impacts on European protected sites.

B3) The draft revised National Planning Policy Framework (NPPF) requires plans to make explicit which policies are strategic policies. These may contain strategic cross-boundary matters or other strategic matters relevant to a local authority area.

Arrangements for necessary ongoing co-operation

ISPA Board and officers will continue to discuss strategic cross-boundary matters with a view to agreeing approaches to addressing these matters, and to reflect the approaches within local plan policies where appropriate.

Housing

C. Defining the Housing Market Area

Background

The draft revisions to the Planning Practice Guidance state that a Statement of Common Ground will need to cover the area that local planning authorities consider to be the most appropriate functional geography for the gathering of evidence and the preparation of planning policies. However, local planning authorities may have more than one Statement of Common Ground where there are strategic cross-boundary matters to be addressed.

Evidence

The Strategic Housing Market Assessment (Part 1, 2017) (SHMA Part 1) defines the Ipswich Housing Market Area (HMA) as covering the local planning authority areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts. The Ipswich HMA is therefore considered to be the most appropriate functional geography for the consideration of cross boundary strategic housing matters, involving the four local authority areas mentioned in this Statement of Common Ground.

Process of reaching outcomes and agreements

The SHMA Part 1 followed the guidance contained in the Planning Practice Guidance (PPG) relating to the definition of the Housing Market Area. Adjoining planning authorities were consulted on the draft SHMA Part 1 as part of its production.

Outcomes and agreements

C1) The four authorities agree that the Ipswich Housing Market Area covers the local planning authority areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts and is the most appropriate functional geography for the consideration of cross boundary strategic housing matters.

Arrangements for necessary ongoing co-operation

On-going co-operation relates to the consideration of housing need and delivery, as set out below.

D. Agreeing the approach to delivery of the housing requirement

Background

The SHMA Part 1 identified the objectively assessed housing need (OAN) for the four local planning authorities. Subsequently, the Government proposed a national standard method for the calculation of housing need through the 'Planning for the Right Homes in the Right Places' consultation (September 2017). The Government has carried these proposals forward through the proposed revisions to the NPPF and the Planning Practice Guidance.

The draft revised NPPF (March 2018) states that the standard methodology should be used as the basis for identifying the local housing need, unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals

The draft revised NPPF states that in determining the minimum number of homes needed planning authorities should take into account any needs that cannot be met in neighbouring areas.

Evidence

The two key pieces of evidence relevant are the housing need and the housing supply.

The housing need as calculated under the SHMA (OAN) and under the national standard method is set out in the table below:

	SHMA annual	SHMA total (2014-2036)	Standard method annual (as published Sept 2017)	Standard method total (2016 – 2036)
Babergh	355	7820	439	8780
Ipswich	519	11420	442	8840
Mid Suffolk	452	9951	573	11460
Suffolk Coastal	460	10111	495	9900
Total	1786	39302	1949	38980

It is noted that the Government's affordability ratio¹ was published in April 2018 and will be applied to the Babergh and Mid Suffolk housing requirement figure. Suffolk Coastal have applied a 10% uplift to the new method figure published in September 2017 in their First Draft Local Plan.

Local planning authorities are required to produce Strategic Housing and Employment Land Availability Assessments to identify the amount of land suitable, available and achievable for housing and employment development. The four authorities are producing evidence as follows:

- Babergh and Mid Suffolk Draft Strategic Housing and Employment Land Availability Assessment was published in August 2017
- Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (*underway*).
- Suffolk Coastal District Council Strategic Housing and Employment Land Availability Assessment (*underway*).

The authorities have worked together on closely aligning the criteria used for assessing the sites, although differences do occur where justified by local circumstances, for example, the approach to development in Flood Zones 2 and 3a.

Process of reaching outcomes and agreements

The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities' approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.

Outcomes and agreements

D1) The housing need calculated under the proposed standard methodology will form the starting point for identifying housing requirements. For Regulation 18 / Preferred Options consultations, to be carried out in summer 2018 / autumn 2018, the need figures

¹ Ratio of Median House Price to Median Workplace Earnings 2017 (Office for National Statistics, 2018)

published by MHCLG in September 2017 under the 'Planning for the Right Homes in the Right Places' consultation will form the minimum housing requirement for Ipswich Borough and Suffolk Coastal District Councils. As detailed above, Babergh and Mid Suffolk District Councils will apply the Government's Affordability Ratio published in April 2018. Housing numbers will be reviewed once the revised NPPF and PPG and the updated household projections are published.

D2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.

D3) Each local planning authority will seek to meet its housing need within its own area. Where the need cannot be met within the local planning authority's own area, the ISPA Board will provide the mechanism for informing potential distribution across the HMA.

D4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will seek to meet their own need for permanent pitches. Should any authority not be able to meet their own need for permanent pitches, the ISPA Board will provide a mechanism for considering how to address the need.

D5) Strategic policies in Local Plans are to reflect agreements relating to the outcomes above.

Arrangements for necessary ongoing co-operation

Land Supply:

Throughout the plan-making process should any authority identify that overall land supply falls below that required to meet the housing need, further co-operation will be required across the Housing Market Area to identify potential solutions to inform distribution across the HMA, for example through re-prioritisation of land uses or new strategic infrastructure.

Housing numbers:

The draft revised PPG requires that planning authorities use the most recent official household projections and the most recent year for which median affordability ratios are available, in calculating their housing need. It will be necessary for the four authorities to revisit outcomes above in light of new publications, at appropriate stages in plan making.

D1 – D4 above:

Following Regulation 18 / preferred options consultations, the authorities will reassess housing requirements, at a point when the 2018 data releases (household projections and house price / work place earning affordability ratios) are all available and the revised NPPF and PPG are published. In the case of Babergh and Mid Suffolk District Councils, the Government's Affordability Ratio published in April 2018 has already been applied to the Government's proposed housing requirement figures identified through the proposed Standard Methodology.

Mix and type of housing:

At this point, the authorities will also consider an update to Part 2 of the Strategic Housing Market Assessment.

E. Impact of bordering strategic housing developments

Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

Evidence

The Councils have jointly commissioned transport modelling to be undertaken (with Suffolk County Council).

The Councils have jointly commissioned Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich.

The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

Process of reaching outcomes and agreements

The conclusions of the above evidence to be considered in site selection and in identifying any necessary mitigation.

Outcomes and agreements

To be confirmed

Arrangements for necessary ongoing co-operation

Transport modelling of preferred options will be required prior to consultation under Regulation 19.

Employment

F. Defining functional economic market area and objectively assessed need

Background

The Employment Land Needs Assessment (2016) defines the Ipswich Functional Economic Area as the area covered by the four local planning authority areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.

The Employment Land Needs Assessment also concludes the amount of employment land needed, based upon the modelling undertaken through the East of England Forecasting Model.

Evidence

Local Planning Authorities are required to identify the future needs for employment land. The four local planning authorities jointly commissioned an Employment Land Needs Assessment and an Ipswich Economic Area Sector Needs Assessment.

Local planning authorities are required to produce Strategic Housing and Employment Land Availability Assessments to identify the amount of land suitable, available and achievable for housing and employment development. The four local authorities are producing evidence as follows:

- Babergh and Mid Suffolk Draft Strategic Housing and Employment Land Availability Assessment was published in August 2017.
- Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (*underway*).
- Suffolk Coastal District Council Strategic Housing and Employment Land Availability Assessment (*underway*).

Process of reaching outcomes and agreements

The ISPA Board provides a mechanism to inform how each local authority will approach key employment centres within each Local Plan.

Outcomes and agreements

F1) Baseline jobs growth is identified in the Ipswich Economic Area Sector Needs Assessment, and for the period 2016 – 2036² equates to:

- Babergh: 3,300
- Ipswich: 17,310
- Mid Suffolk: 5,860
- Suffolk Coastal: 7,220

The baseline minimum employment land (for B class uses) to be provided in the Ipswich Functional Economic Area is 50 hectares over the period 2016 – 2036³, split as follows for each local authority:

- Babergh: 2.6ha
- Ipswich: 25.7ha
- Mid Suffolk: 8.5ha
- Suffolk Coastal: 13ha

² Note this updates Table 3.1 on page 32 of the Ipswich Economic Area Sector Needs Assessment (September 2017), as the evidence used a 2014 base date.

³ Note this updates Table 16.2 on page 202 of the Ipswich Economic Area Sector Needs Assessment (September 2017), as the evidence used a 2014 base date.

Each local authority shall determine an appropriate approach to employment land provision, and may allocate more land if necessary to provide for flexibility and a range of sites.

A Port Logistics Study has been completed for Felixstowe and will be reflected in planning for employment land in the Suffolk Coastal Local Plan.

F2) The distinct economic geographies across the Functional Economic Area are:

- Felixstowe / A14 corridor;
- Wider Ipswich Market Area;
- A140 corridor;
- Rural and agricultural.

All local plans in the Functional Economic Area will seek to support and strengthen these.

F3) Strategic policies in local plans are to reflect the employment requirements identified in the evidence base.

Arrangements for necessary ongoing co-operation

The ISPA Board provides a mechanism to inform the authorities' approach to employment land requirements within each Local Plan.

G. Impact of bordering strategic employment land developments

Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

Evidence

The Councils have jointly commissioned transport modelling to be undertaken (with Suffolk County Council). Scenarios will be modelled to inform the preferred options consultations.

The Councils have jointly commissioned Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich.

The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

Outcomes and agreements

To be confirmed

Arrangements for necessary ongoing co-operation

Transport modelling of preferred options will be required prior to consultation under Regulation 19.

Retail, leisure and other commercial

H. Enhancement and regeneration of retail centres

Background

The National Planning Policy Framework requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes. As the county town, Ipswich acts as a focus for much of the retail and commercial leisure across the four authorities, which is taken account of in the baseline for each of the retail studies identified below.

Evidence

Babergh and Mid Suffolk Town Centres and Retail Study (September 2015)
Ipswich Borough and Suffolk Coastal District Retail and Commercial Leisure Town Centre Study (October 2017)

Process of reaching outcomes and agreements

Through ISPA Board

Outcomes and agreements

H1) Local plans to recognise the regional role of Ipswich town centre, alongside other towns and centres in the Functional Economic Area, as a focus for retail and commercial leisure activity, in accordance with the NPPF.

Arrangements for necessary ongoing co-operation

Through the ISPA Board

Infrastructure provision

Provision and enhancement of strategic infrastructure improvements

I. Strategic Infrastructure priorities

1. Ipswich Northern Route

Background

In addition to the Upper Orwell Crossings and integrated transport solutions, including bus network improvements within the Town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in

the long term. This intervention is needed to improve connectivity between the A14 and A12, enabling the delivery of growth and improving journey times, in turn reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange

Evidence

An Ipswich Northern Route Study was published in January 2017, which assessed three indicative broad routes for a potential Ipswich Northern Route.

Outcomes and agreements

I1) Evidence informing the current adopted plans did not identify the need for a northern route.

I2) The northern route will be complementary to a range of transport measures such as the Upper Orwell Crossings and improvements to sustainable transport.

I3) That consideration of development within the area will need to be informed by further transport analysis during the preparation of local plans that will identify the degree of dependency on the delivery of a northern route.

I4) The authorities expect that evidence gathering for the next set of local plans will examine route options in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond what will be planned for in the current local plan reviews.

I5) Consideration of funding mechanisms to enable delivery will be integrated within this next stage of evidence gathering.

Arrangements for necessary ongoing co-operation

To be confirmed

2. Other strategic infrastructure priorities

Background

The National Planning Policy Framework recognises the provision of infrastructure as integral to planning for new development. Public bodies across Suffolk recognise the benefits of collectively identifying and supporting strategic infrastructure priorities in order that focus can be placed upon securing these.

Evidence

Through Infrastructure Delivery Plans and Suffolk Growth Programme Board

Process of reaching outcomes and agreements

Through ISPA Board and Suffolk Growth Programme Board

Outcomes and agreements

16) Strategic policies in Local Plans will reflect and support delivery of infrastructure priorities.

17) Other infrastructure requirements related to growth planned in local plans is to be identified within the relevant local plans and Infrastructure Delivery Plans. Where necessary, Infrastructure Delivery Plans are to be aligned

Arrangements for necessary ongoing co-operation

The Ipswich Strategic Planning Area Board to provide a mechanism for co-operation in relation to requirements for infrastructure arising from development planned in local plans, as plans progress.

The ISPA Board Terms of Reference identify the link between the ISPA Board and the Suffolk Growth Programme Board Portfolio Holders.

J. Identification of cumulative / cross border infrastructure requirements resulting from planned growth, and mitigation measures

Background

The NPPF recognises the provision of infrastructure as integral to planning for new development. Due to the close functional relationship between Ipswich and the surrounding Districts there is potential for cross-border or shared infrastructure requirements resulting from planned growth in emerging local plans.

Evidence

Transport modelling

Evidence provided by Suffolk County Council in relation to education capacities and constraints

Process of reaching outcomes and agreements

Shared framework developed between the local planning authorities and Suffolk County Council for identifying potential education constraints and requirements.

Shared framework developed between the local planning authorities and Suffolk County Council for identifying potential highways constraints and requirements.

Outcomes and agreements

J1) Infrastructure requirements related to growth planned in local plans are to be identified within the relevant local plans and Infrastructure Delivery Plans. Where necessary, Infrastructure Delivery Plans are to be aligned.

Arrangements for necessary ongoing co-operation

The Ipswich Strategic Planning Board to provide a mechanism for co-operation in relation to requirements for infrastructure arising from development planning in local plans, as plans progress.

The ISPA Board Terms of Reference identify the link between the ISPA Board and the Suffolk Growth Portfolio Holders.

Environmental protection

Conservation and enhancement of the natural and historic environment

K. Mitigation of potential impacts upon internationally protected sites

Background

The Habitats Directive⁴ requires that plans and projects must not adversely affect the integrity of Special Protection Areas and Special Areas of Conservation (other than in exceptional circumstances where there are imperative reasons of overriding public interest).

Previous assessments undertaken in relation to the Habitats Directive / Regulations have identified the potential for impacts upon SPAs and SACs in relation to recreational disturbance resulting from development, and require mitigation to be secured to minimise the potential for adverse effects on the sites.

Evidence

Assessment under the Habitats Regulations to be undertaken during production of the local plans.

Babergh District Council, Ipswich Borough Council and Suffolk Coastal District Council are producing a Recreation Avoidance and Mitigation Strategy to provide a mechanism to secure mitigation.

Process of reaching outcomes and agreements

Assessments will be undertaken at relevant stages in the production of emerging local plans to identify whether the plans are likely to adversely affect the integrity of Special Protection Areas and Special Areas of Conservation.

⁴ Directive 92/43/EEC

Natural England is a ‘prescribed body’⁵ for the purposes of the Duty to Co-operate. Consultation will take place with Natural England on assessments produced under the Habitats Directive.

Outcomes and agreements

To be confirmed

Arrangements for necessary ongoing co-operation

Ongoing liaison with Natural England

6. Process for reviewing the Statement of Common Ground

The Statement of Common Ground will be reviewed at key stages during the production of the local plans and will be updated / amended as necessary. The triggers for updating the Statement of Common Ground could include (but are not limited to):

- Changes to the housing number resulting from the publication of new household projections or affordability ratios;
- Consultation feedback;
- The production of new assessments or evidence;
- Changes to national policy.

⁵ As defined in the Town and Country Planning (Local Planning) (England) Regulations 2012