



Suffolk Coastal **Local Plan**

Duty to Cooperate Statement



Final Draft Plan | January 2019

Representations period: 14th January to 25th February 2019

www.eastsuffolk.gov.uk/suffolkcoastallocalplanreview



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1. Introduction

- 1.1 Section 110 of the Localism Act sets out the Duty to Cooperate. The duty applies to all Local Planning Authorities, National Park Authorities and County Councils in England and to a number of other prescribed public bodies. The Duty to Co-operate requires these bodies to engage constructively, actively and on an ongoing basis in relation to strategic cross boundary planning issues. Local Planning Authorities have to demonstrate how they have met the requirements of the duty,
- 1.2 The purpose of this statement is to demonstrate how Suffolk Coastal District Council has met the requirements of the Duty to Co-operate in the preparation of the Suffolk Coastal Local Plan.
- 1.3 The National Planning Policy Framework states that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Cooperation is ongoing and statements will be updated as necessary.

2. Context

- 2.1 Suffolk Coastal District is located on the eastern coast of Suffolk and shares a boundary with Ipswich Borough and Babergh, Mid Suffolk and Waveney Districts. Suffolk is a two-tier area, with Suffolk County Council providing upper-tier services. The A12 and A14 and rail links form strategic connections between Suffolk Coastal and adjoining authorities and beyond.
- 2.2 At the Suffolk County level, all local authorities have adopted a collaborative approach to deliver growth, particularly through the New Anglia LEP's Norfolk and Suffolk Economic Strategy and Growth Deal and the Greater Ipswich City Deal. The Suffolk Growth Programme Board was established to oversee and coordinate the growth opportunities in the County and played a key role in the preparation of the Suffolk Growth Strategy.
- 2.3 The Growth Programme Board is chaired by Stephen Baker, Chief Executive of the east Suffolk Councils with membership drawn from Suffolk local authorities, New Anglia Local Enterprise Partnership, Suffolk Chamber of Commerce, the University of Suffolk and the Suffolk Housing Board. The role of the Board is to lead on the delivery of growth in Suffolk and particularly the economic vision for growth; coordinate programmes and projects for growth directly and through facilitated work with partners; influence public / private stakeholders, businesses and politicians about the Suffolk priorities for growth, competitive position and prosperity; and managing risk through a flexible and innovative approach to growth. The proposed outcomes for the Board are as follows:

- Secure investment to deliver infrastructure that will enable development to the longer term benefit of Suffolk's communities and businesses
- Create a consistent, efficient, and transparent approach to planning to improve land supply
- Make Suffolk an optimal location for commercial innovation, investment, and business expansion
- Meet clearly identified skills, employment and economic development needs
- Deliver the homes that Suffolk needs to match current and future demand.
- Operate system wide approach to funding and finance supporting place based initiatives over the medium and long

2.4 As part of the collaborative approach to growth, quarterly officer level meetings also take place with Norfolk planning authorities to jointly consider and address cross boundary strategic issues.

Neighbouring Authorities

2.5 Suffolk Coastal shares a border with Ipswich Borough and Babergh, Mid Suffolk and Waveney Districts, as shown on Map 1 below. The areas covered by Babergh, Mid Suffolk, Ipswich and Suffolk Coastal form the Ipswich Strategic Planning Area.



Map 1: Suffolk Coastal District

Babergh District

- 2.6 Suffolk Coastal shares a border with Babergh District in the south eastern part of the District. The border is formed mostly of the River Orwell, and the linkages between the two Districts relate to largely their relationship with Ipswich and to transport connections. Babergh is a largely rural District with the two main towns being Hadleigh and Sudbury. The eastern part of Babergh District has particularly strong connections with Ipswich due to the Borough boundary being tightly drawn.

Ipswich Borough

- 2.7 Ipswich is the county town of Suffolk and Ipswich Borough borders part of the south western part of Suffolk Coastal District, with communities in the area of Suffolk Coastal surrounding Ipswich having strong links with the Borough due to the Borough having a tightly drawn boundary.

Mid Suffolk District

- 2.8 Mid Suffolk borders the western edge of Suffolk Coastal District and the border between the two Districts is largely rural. The two main towns and Stowmarket and Needham Market both of which are connected to Ipswich via the A14 and the Ipswich to Cambridge railway line.

Waveney District

- 2.9 Waveney District is located directly to the north of Suffolk Coastal, with the main town being Lowestoft. The two Districts are connected by the A12. The two Councils currently have a shared services partnership which includes a shared Planning Policy team. On 1st April 2019, the two Councils will be dissolved and the new East Suffolk Council will be created. Waveney District Council are producing a new Local Plan which is anticipated to be adopted in March 2019 which will provide the vision, strategic priorities, policies and proposals against which planning applications will be determined for the geographic area covered by Waveney until such a time as the new East Suffolk Council review the local plans.

3. Cooperation on Strategic Matters

- 3.1 Suffolk Coastal District Council has engaged constructively with all partners during the preparation of the Local Plan, and has also engaged constructively in relation to the production of neighbouring authorities' plans.
- 3.2 The following topics are those matters which are strategic cross boundary matters subject to the duty:
- Housing
 - Employment

- Infrastructure
- Internationally protected sites
- Coastal management

3.3 The text below summarises the strategic cross-boundary matters and the ways in which the Council has worked with other authorities in relation to these. Table 1 summarises the cooperation that has taken place and the outcomes reached, which is detailed further in Statements of Common Ground.

Ipswich Strategic Planning Area

3.4 The Ipswich Strategic Planning Area (ISPA) encompasses the areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts, reflecting the close functional relationships between these authorities. The principal mechanism for working on cross-boundary strategic planning matters of relevance to Suffolk Coastal is via the Ipswich Strategic Planning Area Board. The area represents the Housing Market Area and the Functional Economic Area recognising the strong functional relationship of the four authorities, centred around the county town of Ipswich.

3.5 The cross boundary matters relevant to the Ipswich Strategic Planning Area include meeting housing and employment needs, identifying cross-boundary infrastructure requirements and mitigating impacts on protected European sites.

3.6 The ISPA Board, comprising of one Councillor from each of the local planning authorities, plus a Councillor from Suffolk County Council, provides the forum by which the five authorities to co-operate on strategic planning matters.

3.7 A Statement of Common Ground has been developed by the ISPA Board throughout the production of the authorities' local plans. This sets out the ways in which the authorities have worked together on the strategic cross boundary planning matters and the outcomes that have been reached. The Statement of Common Ground is published on the Council's website alongside the Final Draft Local Plan at www.eastsuffolk.gov.uk/finaldraftlocalplan.

3.10 Chapter 2 of the Final Draft Local Plan reflects the agreements reached through the Ipswich Strategic Planning Area Board.

Waveney District

3.11 Waveney District adjoins the northern border of Suffolk Coastal District, however forms its own Housing Market Area and Functional Economic Area. As part of the production of the Waveney Local Plan a Statement of Common Ground has been produced which acknowledges that Waveney forms its own Housing Market Area and Functional Economic Area, and that it will meet its objectively assessed needs for development in full. Suffolk Coastal District Council is signatory to the Statement of Common Ground. The Statement of Common Ground can be viewed at www.eastsuffolk.gov.uk/newwaveneylocalplan.

3.12 In recognition of cross-boundary effects from recreational pressure at European protected sites, the approach to mitigating the impacts of growth on protected European sites through

the production of the Recreation and Avoidance Mitigation Strategy involves Waveney District Council as well as the four Ipswich Strategic Planning Area Authorities. This approach is detailed in the Ipswich Strategic Planning Area Statement of Common Ground and is taken forward through policies in Chapter 10 of the Final Draft Local Plan.

Coastal Zone and Marine Planning and Management

- 3.13 The management of the coast represents a strategic cross-boundary planning matter which requires collaboration between coastal authorities. Suffolk Coastal District Council, along with the Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Great Yarmouth Borough Council, Waveney District Council and The Broads Authority signed a Statement of Common Ground in relation to Coastal Zone Planning in September 2018. This sets out a series of shared aims and an agreed approach in relation to working together on coastal planning issues. The Statement of Common Ground can be viewed at www.coasteast.org.uk/plans-and-policies/local-plans/.
- 3.15 The day to day management of the coast in Suffolk Coastal District is covered by Coastal Partnership East, a partnership which brings together the coastal management resources and expertise from Great Yarmouth Borough Council, North Norfolk District Council, Suffolk Coastal District Council and Waveney District Council.
- 3.16 Chapter 9 of the Final Draft Local Plan contains policies in relation to coastal management which reflect the aims of the Statement of Common Ground.
- 3.17 The Marine Management Organisation is responsible for preparing plans for the marine areas around England, including those around the coast of Suffolk Coastal District Council. The Council has engaged in the production of the East Inshore and East Offshore Marine Plans and the Final Draft Local Plan. The marine plans have been taken into account in the production of the Local Plan and reference is included in the Final Draft Local Plan to proposals taking account of relevant policies in the East Marine Plan, where relevant.

Infrastructure

- 3.18 In terms of infrastructure provision the Council has worked constructively with a range of infrastructure providers including Suffolk County Council, the Ipswich and East Suffolk Clinical Commissioning Group and water companies to identify the infrastructure needs associated with development planned for in the new Local Plan. This engagement will be ongoing during implementation of the Plan.

Table 1: Summary of cooperation on strategic cross boundary planning matters

Strategic matter	Issue(s)	Relevant partners	Management and working arrangements	Evidence base	Outcome	Ongoing cooperation	Further reference
Housing	<p>Identification of the housing market area as an appropriate functional geography</p> <p>Considering whether the District is required to meet any needs from neighbouring authorities</p>	<p>Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council (ISPA)</p> <p>Waveney District Council</p>	<p>Ipswich Strategic Planning Area Board considers strategic matters relevant to the ISPA.</p> <p>Joint evidence commissioned across the ISPA and with Waveney District Council.</p>	<p>Ipswich and Waveney Strategic Housing Market Assessment (Part 1, 2017)¹</p> <p>Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017)²</p>	<p>The ISPA represents the area identified as the Ipswich Housing Market Area. Each local planning authority to seek to meet its own need in its own area.</p> <p>Chapter 2 of the Final Draft Local Plan reflects the outcomes.</p>	<p>Through the ISPA Board.</p> <p>Suffolk Coastal will continue to cooperate with neighbouring authorities in the production of their new Local Plans.</p>	<p>Ipswich Strategic Planning Area Statement of Common Ground (December 2018)³</p> <p>Waveney Local Plan Duty to Cooperate Statement on Housing Market Area, Functional Economic Area and Objectively Assessed Need (August 2018)⁴</p>
Employment	<p>Definition of Functional Economic Area and</p>	<p>Babergh District Council, Ipswich Borough Council,</p>	<p>Ipswich Strategic Planning Area Board considers strategic</p>	<p>Ipswich and Waveney Economic Areas</p>	<p>The ISPA represents the area identified as the Ipswich</p>	<p>Through the ISPA Board.</p>	<p>Ipswich Strategic Planning Area Statement of Common</p>

¹ Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 (Peter Brett Associates, May 2017)

<http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-1.pdf>

² Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (RRR Consultancy, May 2017)

<http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-1.pdf>

³ 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 (Version 3 – December 2018)

www.eastsuffolk.gov.uk/finaldraftlocalplan

⁴ Waveney Local Plan Duty to Cooperate Statement on Housing Market Area, Functional Economic Area and Objectively Assessed Need (Waveney District Council, August 2018)

www.eastsuffolk.gov.uk/newwaveneylocalplan (See Waveney Local Plan Examination Document Library)

Strategic matter	Issue(s)	Relevant partners	Management and working arrangements	Evidence base	Outcome	Ongoing cooperation	Further reference
	approach to meeting employment needs across the Ipswich Strategic Planning Area	Mid Suffolk District Council (ISPA) Waveney District Council	matters relevant to the ISPA. Joint evidence commissioned across the ISPA and with Waveney District Council.	Employment Land Needs Assessment (2016) ⁵ Economic Area Sector Needs Assessment (2017) ⁶ Port of Felixstowe Growth and Development Needs Study (2018)	Functional Economic Area. Chapter 2 of the Final Draft Local Plan reflects the outcomes.	Suffolk Coastal will continue to cooperate with neighbouring authorities in the production of their new Local Plans.	Ground (December 2018) ⁷ Waveney Local Plan Duty to Cooperate Statement on Housing Market Area, Functional Economic Area and Objectively Assessed Need (August 2018) ⁸
Infrastructure	Provision of infrastructure to meet needs of growth set out in	Suffolk County Council, Ipswich and East Suffolk Clinical	Engagement with infrastructure providers through preparation of the	Cross Boundary Water Cycle Study (January 2019) ⁹	Infrastructure requirements are detailed in the Infrastructure	Ongoing cooperation with infrastructure providers through	Ipswich Strategic Planning Area Statement of Common Ground (December

⁵ Ipswich and Waveney Economic Areas Employment Land Needs Assessment (Nathaniel Lichfield and Partners, 2016)

<http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Employment-Land-Needs-Assessment-2016.PDF>

⁶ Economic Area Sector Needs Assessment (Lichfields, 2017)

<http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Employment-Land-Needs-Assessment-2016.PDF>

⁷ 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 (Version 3 – December 2018)

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⁸ Waveney Local Plan Duty to Cooperate Statement on Housing Market Area, Functional Economic Area and Objectively Assessed Need (Waveney District Council, August 2018)

www.eastsuffolk.gov.uk/newwaveneylocalplan (See Waveney Local Plan Examination Document Library)

⁹ Suffolk Coastal District Council and Ipswich Borough Council Cross Boundary Water Cycle Study (Wood Plc, January 2019)

<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/>

Strategic matter	Issue(s)	Relevant partners	Management and working arrangements	Evidence base	Outcome	Ongoing cooperation	Further reference
	Local Plans	Commissioning Group, NHS England, Highways England, Suffolk Constabulary, Anglia Water, Essex and Suffolk Water, Environment Agency, Greater Anglia, UK Power Networks and neighbouring authorities	Local Plan. Engagement with neighbouring authorities.	Local Plan Transport Modelling – Forecasting Report Volume 1 Suffolk Coastal and Ipswich (August 2018) ¹⁰ Local Plan Transport Modelling – Forecasting Report Volume 2 Suffolk Coastal and Ipswich (January 2019) ¹¹	Delivery Framework in the Suffolk Coastal Final Draft Local Plan. The Ipswich Strategic planning Area Statement of Common Ground (December 2018) identifies cross boundary infrastructure requirements. Chapter 2 of the Final Draft Local Plan reflects the outcomes.	delivery of the Local Plan.	2018) ¹²
Protected European sites	Mitigation and avoidance of impacts on	Babergh District Council, Ipswich Borough Council,	Working group set up to prepare the Recreation and	Habitats Regulations Assessments for	A Recreational Avoidance and Mitigation Strategy is	Through implementation of the Strategy	Ipswich Strategic Planning Area Statement of Common

¹⁰ Local Plan Transport Modelling – Forecasting Report Volume 1 Suffolk Coastal and Ipswich (WSP, August 2018)

<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/>

¹¹ Local Plan Transport Modelling – Forecasting Report Volume 2 Suffolk Coastal and Ipswich (WSP, January 2019)

<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/>

¹² 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 (Version 3 – December 2018)

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Strategic matter	Issue(s)	Relevant partners	Management and working arrangements	Evidence base	Outcome	Ongoing cooperation	Further reference
	European site from increased recreational pressure.	Mid Suffolk District Council, Waveney District Council, Natural England.	Avoidance and Mitigation Strategy. Joint commissioning of consultants to prepare the strategy.	all Local Plans	being finalised, and will be taken forward and adopted through a Supplementary Planning Document. Policy SCLP10.1 reflects the preparation of the strategy.	and production of the Supplementary Planning Document.	Ground (December 2018) ¹³
Coastal Management	Strategic management of the coast	North Norfolk District Council, Great Yarmouth Borough Council, Waveney District Council, Marine Management Organisation, Environment Agency.	Coastal Partnership East	Shoreline Management Plan 7 Lowestoft Ness to Felixstowe ¹⁴	Policies SCLP9.3 Coastal Change Management Area and SCLP9.4 Coastal Change Rollback or Relocation relate to coastal management.	Council will continue to cooperate through Coastal Partnership East	Statement of Common Ground on Coastal Zone Planning (August 2018) ¹⁵

¹³ 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 (Version 3 – December 2018)

www.eastsuffolk.gov.uk/finaldraftlocalplan

¹⁴ Shoreline Management Plan 7 Lowestoft Ness to Felixstowe <http://www.suffolksmp2.org.uk/>

¹⁵ Statement of Common Ground on Coastal Zone Planning (Norfolk and Suffolk Coastal Authorities, August 2018)

<https://www.coasteast.org.uk/plans-and-policies/local-plans/>