

## **Ipswich Policy Area Board topic paper – boundary review**

### Historic overview of the Ipswich Policy Area

The Ipswich Policy Area (IPA) has formal planning status set out in local planning authority development plan documents, namely adopted core strategies. Prior to this its context was set out in the Suffolk Structure Plan and the East of England Plan. Although both are no longer in existence, they provide a useful historical content on the original purpose of the IPA.

The 2001 Suffolk Structure Plan identified a leading strategic role for the IPA in accommodating housing and employment growth within Suffolk. This strategy was extended through the Regional Strategy (RS), the East of England Plan (May 2008) until its abolition in January 2013. The RS provided, and for the time-being continues to provide, the baseline evidence and position for joint working across the relevant IPA authorities, namely Ipswich Borough, Babergh, Mid Suffolk and Suffolk Coastal District Councils. This paper explains how work within the IPA has been undertaken in each local authority area. Historic housing completions for the IPA are provided in Appendix 1.

### **Ipswich**

Ipswich has relatively tight administrative boundaries and there are cross-boundary issues that are relevant to the development and future of both the Borough and the urban area of Ipswich. Therefore, the adopted Ipswich Core Strategy (December 2011) acknowledges the need for a cross-boundary approach to the planning of development within the IPA through its Objective 12 'To work with other local authorities in the Ipswich Policy Area and with LSP (local strategic partnership) partners to ensure a co-ordinated approach to planning and development.' This is given effect through Core Strategy policy CS6 the Ipswich Policy Area: 'Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich, in order to deliver appropriate development. It will achieve this in a variety of ways ...' and an indicative map of the IPA (based on that from the 2001 Structure Plan) is included in Appendix 3 of the Plan. Further policies also maintain the IPA approach to planning to meet development needs, for example the policies on gypsy and traveller accommodation (CS11) and planning for jobs growth (CS13). The IPA has also provided a basis for joint evidence gathering.

### **Suffolk Coastal**

Suffolk Coastal lies to the east of Ipswich Borough. The 1996 Suffolk Coastal Local Plan identified Ipswich as the hub of an extensive sub-region with parts of the built up area extending into Suffolk Coastal. The plan defined the nine parishes within this border area as Ipswich Fringe i.e. the Suffolk Coastal element of the wider IPA as identified through iterations of the Structure Plan. In 1996, the Ipswich Fringe was already subject to extensive new housing provision with three large developments at Grange Farm, Bixley Farm and Warren Heath providing a total of 4,870 homes between 1988 and 2006. Martlesham Heath 'new village' another large scale development was also under construction located close to the BT Laboratories site and an industrial area. For these reasons paragraph 13.10 of the 1996 Local Plan concluded '*there is clearly no need to make specific allocations of land for residential development to meet the housing requirements in the Suffolk Coastal part of the Ipswich Policy Area up to 2006.*' Those housing developments are now built out, however, the 2008 East of England Plan continued to view the Ipswich Fringe as a growth area linked to the wider needs of Ipswich requiring a further 3,200 homes over the period 2001-21.

The Suffolk Coastal District Local Plan (2013) also continues to recognise the importance of the IPA as a sub-area within a wider Eastern Ipswich Plan Area and has extended its geographical cover by the addition of Westerfield within the IPA designation. The Plan identifies a new strategic growth area for 2,000 homes east of the A12 to accommodate this

growth linked to the continued expansion of the BT and associated site now identified as a strategic employment site (policy SP20). Paragraph 3.29 of the Plan confirms its commitment to meeting the (former) RS IPA requirement. Importantly, the 2013 Plan recognises that the scale of growth to be accommodated within this part of the IPA has now reached a critical point in terms of potential impact on the Natura 2000 sites including the Deben Estuary and The Sandlings both on their own and in combination with the scale of development within Ipswich Borough. Significant mitigation including new green infrastructure provision is required as part of the development package (policies SP20 and SP21). Policy SP4 acknowledges the need for cross boundary working to secure the provision of transit pitch provision for gypsies and travellers.

The 2013 Plan also acknowledges the scale of growth is now impacting on operational capacity the A14 (policy SP10). Within Suffolk Coastal, this includes cumulative impact of strategic areas for growth proposed within Suffolk Coastal on land to the east of the A12 (SP20 – 2,000 homes) and the Felixstowe Peninsula (SP21 1,440 homes) and the Felixstowe South Re-configuration works at the Port of Felixstowe. Elsewhere cumulative impact arises from the scale of development originating from the RS a key issue under 'duty to co-operate'. Policy SP10 – A14 & A12 states *'The A14 is an important route on the European map providing a link from the port of Felixstowe to the remainder of the UK and its markets. Ensuring that it continues to function as a strategic route is of national and international significance. Off-site port related activities should be located on or well related to this transport corridor.....However there are capacity issues ...around Ipswich...including the Orwell Bridge where the A12 and A14 combine into a single route. This section is also heavily used by local traffic...'* Solutions to solving these issues will require a joint approach and an updated evidence base. With reference to joint evidence, it is acknowledged that locations for off-site port related development may need to be found both within and outside the district along the A14 corridor (paragraph 3.77).

### **Mid Suffolk**

The Mid Suffolk Local Plan 1998 (para 2.1.4) refers to the A14 corridor in terms of 'the A14 continuing to attract pressure for growth that should be addressed as road and rail links improve'. Stowmarket is identified for large scale growth while the plan looks to see if the plan can take 'further sustainable growth'. However it makes limited mention of the IPA/or the role of Ipswich although land allocations were made within the IPA. These are essentially large brownfield sites with the approach to accommodate growth while protecting the countryside around Ipswich. The Core Strategy (2008) Vision notes the parishes of Bramford, Great Blakenham, Barham, Claydon, Whitton, and Akenham lie in the Ipswich Policy Area of the Haven Gateway Partnership. The partnership and designated area will deliver additional housing and create additional focus for growth in hi-tech, knowledge based employment, protect/enhance its natural assets through a network of open spaces/green corridors, and maintain the character of the individual villages. The Key Diagram shows the location of the IPA and the parishes/key settlements within it. Paragraph 2.21 makes explicit reference to the influence of Ipswich through the inclusion of the IPA in the context of the Haven Gateway Partnership growth point and allocation of 800 dwellings/jobs provision associated with the Haven Gateway (RS) as a strategic location for growth. The locations within the IPA that are capable of sustaining the required housing growth are largely brownfield sites – Claydon (part Barham), Great Blakenham, and Bramford. The Core Strategy notes the Snoasis site has planning permission providing a large additional land supply mostly of tourism/employment uses and green infrastructure.

## **Babergh**

The Babergh Local Plan 2006 refers to new sub-regions in the RS including the Haven Gateway based around the Haven Ports, supported by the hi-tech knowledge-based activities in Ipswich and its emerging links to the Cambridge Sub-Region. The settlement hierarchy classifies Ipswich (built-up part in the Babergh District) as a town although this is primarily a tool for managing the existing built area of the Fringe including a number of brownfield former employment uses. The Babergh Core Strategy 2014 in its spatial profile (para 1.4.5) notes Babergh's north east edge includes part of the larger urban area of Ipswich known as the Ipswich Fringe, comprising Copdock & Washbrook, Pinewood, Wherstead, Sproughton and Belstead, which together have a population of 7,590. Para 2.6.2 on the duty to co-operate acknowledges the IPA as an explicit entity and planned/co-ordinated approach to development outside the Ipswich boundary that serves/relates to Ipswich Borough. The Key Diagram depicts the town/urban area designation of the Ipswich fringe including direction of housing and employment growth. Policy CS1 on settlement hierarchy includes the Ipswich fringe with 350 dwellings in a strategic allocation bounded by the A1071, A14, and London Road. Policy CS2 (Strategy for Growth and Development) refers to sub-regionally and locally strategic sites including Sproughton, Brantham, Wherstead Park and Sprites Lane, Ipswich to accommodate the need for strategic and well-located sites for port-related and other businesses, and new business land and premises in Ipswich. Core Strategy policies CS7-9 set out requirements for the Babergh Ipswich Fringe Strategic Site Allocation (26ha) for 350 dwellings and 6ha of employment/business use, the Sproughton Strategic Employment Land Allocation (36ha) on the former sugar beet factory site, and Wherstead Park Strategic Employment Land Allocation (7ha).

### Options for the future

#### **The Existing Ipswich Policy Area**

The 2001 Suffolk Structure Plan identified a leading strategic role for the Ipswich Policy Area (IPA) in accommodating housing and employment growth within Suffolk. This strategy was extended through the East of England Plan (May 2008) until its abolition in January 2013. The IPA approach including the IPA boundaries is now well established in Core Strategies. As a result the existing IPA boundaries form an important starting point as they are legally extant.

For Ipswich Borough there is recognition of tight administrative boundaries and the need to address cross-boundary issues through joint working. The role is one of meeting growth needs while ensuring a co-ordinated approach to planning and development.

In Babergh and Mid Suffolk the role of the IPA in taking growth relates to the regeneration of key former employment areas and taking a certain level of growth while protecting the countryside. The approach is one of management of the Ipswich Urban Fringe with strategic allocations with an emphasis on large brownfield former employment sites in key locations on the A14 corridor mostly retained for employment uses. Further growth in the Babergh and Mid Suffolk IPA would require a corresponding evidence base especially on environmental impact and infrastructure including impact/mitigation on the A14.

In Suffolk Coastal, the approach through the wider Eastern Ipswich Plan Area proposals is similar to that for Babergh and Mid-Suffolk, securing high quality development within the strategic growth area (major centre) and a multi-layered approach to the remaining area. Any longer term potential continuation of development east of Ipswich into Suffolk Coastal will however require additional evidence to be provided to determine impact on the very high environmental designations can be sufficiently mitigated. Updated evidence will also be required to identify impacts on the A14 and surrounding road network to ensure that it remains effective as an internationally important through route and to service shorter local

journeys given the local interconnections between Ipswich, Felixstowe and Martlesham / Woodbridge.

### **A wider Ipswich Policy Area**

At present it is recommended for planning purposes to focus on development in and around the Ipswich fringe within the existing IPA including Westerfield. A map is shown in Appendix 2. This provides the most sustainable approach in terms of access to jobs and facilities while promoting the use / regeneration of brownfield sites in the IPA. However a wider IPA may need to be explored if serious housing supply shortages occur in the future and growth is currently planned within a short distance of Ipswich including at Felixstowe and Hadleigh.

### **Ipswich housing market area**

The strategic housing market assessment for the Ipswich housing market area published in August 2012, confirmed it is appropriate to consider the whole district areas of Babergh, Mid Suffolk and Suffolk Coastal within the Ipswich housing market area. Extending the policy area boundary to include whole districts would correspond with work also being undertaken as part of the Ipswich City Deal. It is recommended to use whole district areas for monitoring purposes to inform strategic planning decisions through local plans. This monitoring will help to highlight where any potential growth pressures may arise during 15-year plan periods and to 2031.

### Conclusions

The Ipswich Policy Area (IPA) as currently drawn is a good starting point for considering cross-boundary planning issues around the Ipswich fringe. However, it is recognised that the influence of Ipswich extends beyond the IPA and therefore it may be necessary to review the IPA boundaries at a later point in time. Detailed travel to work data will not be available until 2015 and as noted in this paper it is recommended to use the existing IPA area plus Westerfield for planning purposes and the housing market area for monitoring purposes.

The land availability paper will focus specifically on sites in the Ipswich fringe to meet housing, employment and other development needs particularly in the five years to 2018. The monitoring work, which will be undertaken annually by each local authority, will identify future growth pressures post 2018 particularly as these development sites are built out. It is recommended that each local authority annual authority monitoring report contain details of both gross and net housing completions, housing land availability and supply in the IPA as a proportion of their overall housing completions, together with land availability and supply for non-housing uses.

Therefore it will be necessary over the next few years for each authority within the IPA to work closely together to plan for future growth pressures within the IPA and possibly beyond to ensure in particular objectively assessed housing need and employment growth can be accommodated in a sustainable manner. It is anticipated that there is enough land in the borough of Ipswich to meet the needs of Ipswich for the next ten years. Therefore the needs of Ipswich will continue to be met within the borough during this time while the sites in Babergh at Copdock and in Suffolk Coastal at both Adastral Park and Trinity Park will both meet the needs of their respective districts.

However, should there be serious housing supply shortages in the future within the borough of Ipswich, consideration will be given as to the role of the IPA in contributing to meeting the borough's needs as well as possibly extending the IPA boundaries as necessary if this is a desired outcome. The availability of present and future infrastructure will need to inform such a process.

**As each authority within the IPA moves forward together, the findings relating to the functional economic area will further assist discussions on the future of the IPA and its governance. The next piece of work is assessing need, assessing sites on a functional economic area basis, and working out implications for the IPA. This will inform the evidence base and future plan making.**

## Appendix 1

### Babergh District Council completions

Parish/Year	01	02	03	04	05	06	07	08	09	10	11	12	13
Belstead			-1					3			1		
Copdock	4	1			1	2							
Pinewood	100	101	8										
Sproughton	1	5	2		3	3	6	2	2	2	4	3	4
Wherstead													
total	105	107	9		4	5	6	5	2	2	5	3	4
Total in IPA	254 (average 20 completions per year)												

### Mid Suffolk District Council completions

Parish/Year	01	02	03	04	05	06	07	08	09	10	11	12	13
Akenham									1				
Barham	1						1	8	2	7	43		6
Grt Blakenham			3				4		1	2	23		85
Whitton												3	0
Bramford						2		23	2	2	1		3
Claydon	35	17	7	22	25	14	3		4	1	1		1
total	36	17	10	22	25	16	8	31	10	12	68	3	95
Total in IPA	353 (average 27 completions per year)												

A total of 607 dwellings were completed in the Babergh District Council / Mid Suffolk District Council area of the Ipswich Policy Area over 13 years between 2001 and 2013 at an average of 47 per year.

### Ipswich Borough Council completions

Year	01	02	03	04	05	06	07	08	09	10	11	12	13
Ipswich		347	468	566	717	782	985	1413	899	389	337	283	96
Total	7,282 (average 607 completions per year)												

A total of 7,282 dwellings were completed in Ipswich Borough Council area over 12 years between 2001 and 2013 at an average of 607 per year.

### Suffolk Coastal District Council completions

SCDC (monitoring year is from 1<sup>st</sup> April to 31<sup>st</sup> March. 2001 is 1/4/2000 – 31/3/2001)

Parish/Year	01	02	03	04	05	06	07	08	09	10	11	12	13
Brightwell	0	0	0	0	0	0	0	0	0	0	0	1	0
Foxhall	0	0	0	0	0	0	0	0	0	0	0	0	1
Little Bealings	0	0	0	0	0	0	0	0	1	1	0	0	0
Martlesham	2	2	2	4	1	8	3	77	12	13	8	3	0
Nacton	0	1	0	0	1	0	3	0	0	1	6	2	0
Playford	0	0	0	0	0	0	0	0	0	0	0	0	0
Purdis Farm	0	0	30	33	3	7	65	0	3	0	-1	0	1
Rushmere St Andrew	20	15	8	7	5	9	21	14	26	36	21	11	8
Westerfield*	0	1	1	1	0	1	-1	1	1	0	0	1	0
Kesgrave	81	136	158	94	90	368	464	352	124	25	9	22	35
Total in IPA	2,453 (average 189 completions per year)												

\* included within IPA for first time 2013 (not included in total)

A total of 2,453 were completed in the Suffolk Coastal District Council area of the Ipswich Policy Area over 13 years between 2001 and 2013 at an average of 189 (rounded) per year.

Note the monitoring period for Ipswich Borough Council and Suffolk Coastal District Council is 1<sup>st</sup> April to 31<sup>st</sup> March.

## **Appendix 2**

See attached map of the Ipswich Policy Area including Westerfield.

4<sup>th</sup> July 2014