

What Good Plans Look Like: Ipswich

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Introduction

The legal framework and processes within which local plan development takes place have been regularly changed since the new system was introduced in 2004. This year saw the publication of the Housing White Paper (HWP), which contains more proposals for reform. Since the NPPF was published, the average time taken to go from formal Publication to Adoption of a plan has actually increased by approximately 9 months. Many authorities will cite the changing policy landscape and the uncertainty that creates as reasons for slowing down their plan making. On the ground, challenges come in the face of opposition to overall housing numbers and specific site selection, amongst other things.

A question we are often asked is “can you tell us what ‘good’ looks like?” There is a reluctance to label any plan as ‘good’ both from the Inspectorate, and from local authorities themselves. So what can we do? This set of small case studies takes recently adopted local plans and asks four simple questions. These questions take some of the key elements of the HWP about ensuring plans deliver and can respond to challenges:

- 1) How does the plan make best use of land?
- 2) Does the plan demonstrate a clear narrative in first identifying and then tackling the issues?
- 3) How does the plan promote a diversity of suppliers and developers?
- 4) How does the plan contribute to the delivery of strategic objectives?

We also look at a set of metrics to assess some of the other issues that can trouble us as a sector. These look at the length of the plan, how much housing is it delivering (and what percentage of the OAN is that?), how many objectives does it have and what was the level of representations received? These provide some context and, when looked at over a number of plans, patterns may start to emerge. Time will tell.

The case studies look at the adopted plan, the Inspectors’ Report, and parts of the evidence base to provide some learning. Each one starts with some simple metrics.

For each question you will see a brief summary of what the plan does with any useful principles covered at the end.

Ipswich Core Strategy and Policies Review and Site Allocations and Policies Plan

Ipswich Borough Council adopted their Core Strategy and Policies plan in December 2011. As a core strategy it contained strategic allocations and development management policies. In February 2017 the council adopted a new local plan, this being a review version of 2011 plan. The council also brought forward the site allocations and policies plan, incorporating an area action plan for a large part of central Ipswich ('IP-One'). The two documents were examined at the same time. Looking at these new plans allows us to look at a review which is part update and part new policy. This case study differs from others in the series as it looks at one way of bringing forward a review of a strategic document whilst introducing detailed policies.

The plan review sets out the nine key challenges for the borough, which is one more than the previous plan. This additional challenge refers to "protecting and supporting appropriately located industrial and business activity". Other changes include increasing resilience in relation to climate change, and a focus on stalled developments. This shows there has been a genuine review of how Ipswich as a place has been 'working' since the previous plan was adopted. Even at the strategic level of key challenges, the new plan reflects changing circumstances and a need to add focus to employment land and stalled developments.

The vision, aims and objectives are edited to reflect this, but at the same time the 'old' plan has not been thrown away. At either end of the scale for a plan review you have 'rip it up and start again' and 'look, but don't touch'. The former may be something an entirely new administration might consider, the latter should involve the least amount of work but may not address key issues. What will happen in practice is more likely to be somewhere in between those two extremes. Precisely where depends in part on really good monitoring. Monitoring should not only report back on delivery metrics, but also how the place is working. Ipswich began revising their plan a little over a year after adopting the last one. This is not a long time, but factor in the plan gestation period of another couple of years and it is clearly long enough to notice an issue with delivery, as well as difficulties in bringing forward industrial and business developments.

This plan review comes at a time when there is still some work to do in order to determine the objectively assessed need for the housing market area (HMA). The Inspector has acknowledged the move toward joint/aligned plans by 2019 and accepts that this is an appropriate way to ensure housing delivery across the HMA. In the short term therefore this plan is seeking to address issues that have arisen since the original core strategy was adopted. It is in this context that this case study is written.

Metrics

- Length (Core Strategy and policies review) – 148 pages plus 21 pages of appendices. The Site Allocations and Policy DPD (incorporating the IP-ONE Area Action Plan) is 84 pages long plus 128 pages of appendices
- Number of objectives – 12
- Number of homes – 9,777 (at 489 per annum) representing 72% of identified need.
- Representations on submitted plan – 9,325 on the Core Strategy Review (of which 36 were in support) and 182 on the Site Allocations Plan (of which 23 were in support) – (Source: Proposed Submission Statements of Consultation for the Core Strategy Review and the Site Allocations Plan – both Sept 2015)
- Time from Publication to Adoption – 767 days
- Following the adoption of the previous Core Strategy in December 2011, work on this review started with the 'Call for Ideas' consultation in February 2013.
- Time from first formal consultation ('Draft Core Strategy Review') to Publication – 10 months.

(Source: Proposed Submission Statement of Consultation– Sept 2015)

Useful links:

Ipswich Adopted Core Strategy and Policies Development Plan Document Review

https://www.ipswich.gov.uk/sites/default/files/adopted_core_strategy_and_policies_dpd_review_1_march.pdf

Site Allocations and Policies (Incorporating IP-One Area Action Plan)

https://www.ipswich.gov.uk/sites/default/files/adopted_site_allocations_and_policies_dpd_and_appendix_3a_site_sheets.pdf

Inspectors' Report

https://www.ipswich.gov.uk/sites/default/files/ipswich_inspectors_report_17_jan_2017_combined.pdf

Statement of Compliance with the Duty to Cooperate

https://www.ipswich.gov.uk/sites/default/files/sucd21_-_ipswich_duty_to_co-operate_statement_for_submission_dec_15.pdf

1) How does the plan make the best use of land?

The plan allocates 'Ipswich Garden Suburb' (IGS), an area to the north of the existing built up area, as its main housing site. This is in effect three parcels of land and accounts for just under 30% of the overall housing delivery for Ipswich. Although this land was identified as an area for housing in the adopted core strategy, it was not allocated. The allocation serves to provide greater certainty and accelerate delivery on the sites.

The plan considers density across the overall plan area, and splits requirements into high, medium and low ranges. Previously developed and centrally located land will be expected to achieve 90 dwellings per hectare (dph). An average of 45dph is sought within the remainder of the area covered by the town centre area action plan ("IP-One") with a minimum of 40dph. In other areas, including the garden suburb, an average of 35dph is sought. This approach balances the need to make the best use of available land and distinguish between the different characters within the borough, reflecting also the relative sustainability of those locations.

Taking a 'garden suburb' approach brings with it certain characteristics that may not be present in a more 'typical' urban extension site. The IGS allocates a country park. This is more likely to be found in a garden suburb than an urban extension as a planned response to providing additional public open space within a development. Higher densities could be achieved but at the expense of open space and other facilities. The IGS therefore looks to provide more than new homes. It helps address other deficiencies such as access to open space in the plan area that a higher density extension could not.

The IGS is not the only allocation in the plan. Around 40% of the housing requirement is set out in other allocations outside the town centre area.

Employment policy takes a flexible approach to allocating sites. The jobs figure of 12,500 can be met with 23.5ha of additional employment land. The plan acknowledges factors that could mean allocating exactly 23.5ha may not provide enough land for the required jobs in the plan period. Firstly, there is always a vacancy rate. Not all land is fully occupied, and so meeting the 23.5ha figure exactly won't provide enough land for 12,500 jobs. Secondly, some sectors have specific location requirements, meaning 'generally available employment land' may not meet their needs. The plan subsequently allocates 30ha and also safeguards 10ha at an existing business park (Futura Park) about half of which had permission at the time the plan was adopted.

Importantly, the plan also acknowledges the link between education/training facilities and meeting employment needs. The plan supports the growth of University Campus Suffolk and Suffolk New College to raise the workforce's skills and qualification levels. This is a crucial element in balancing housing, employment and social needs. It acknowledges the potential of existing residents to become trained and skilled up to meet the needs of new and existing employers. This in turn benefits the local economy and helps reduce in-commuting.

We think that for a plan to make the best use of land it has to:

Ensure key sites are allocated – Areas for growth help set a strategy, but allocating sites provides additional detail and certainty on delivery

Weigh up the issues that the plan has to address – maximizing housing delivery is a countrywide priority, but local issues such as public open space deficiency or education facilities must be part of the balance

Understand the locational requirements of different businesses and allocate enough land in suitable locations to meet those requirements – this may include safeguarding existing employment sites. The NPPF does not rule out protecting employment land, but make sure such an approach is well-evidenced

Support the growth of training and educational establishments – these institutions will help increase local employment and provide a local workforce with skills to meet employers needs

2) Does the plan demonstrate a clear narrative in first identifying and then tackling the issues?

As a revision to the core strategy, this plan does not change the overall objectives significantly. The plan is set out in four parts: The Context; The Strategy; Development Management Policies; Implementation, Targets, Monitoring and Review.

The context includes information on the planning system and how Ipswich sits in the region, as well as how the plan sits within other plans that cover the area. It also references key partnerships such as the LEP, and an explanation of the Duty to Cooperate.

Chapter 5 is where we learn about Ipswich as a place. This includes a neat table setting out the 'vital statistics' for the town. The breakdown of different employment sectors is particularly interesting and helps set the context for how employment provision is set out in the plan:

Population	117,000 (2001) 133,384 (2011) 134,693 (mid-2013)
Number of Economically Active People (Ipswich Residents)	70,500 (April 2012 – March 2013, Nomis) 71,500 (July 2013 – June 2014, Nomis)
Numbers of Employed People (Ipswich Residents)	63,500 (April 2012 – March 2013, Nomis) 66,100 (July 2013 – June 2014, Nomis)
Employment Sectors (employee jobs)	<p>Energy and Water – 1,100 (1.7%) Manufacturing – 2,400 (3.7%) Construction – 2,300 (3.5%) Wholesale and retail – 10,300 (15.5%) Transport storage – 4,000 (6.0%) Accommodation and food services – 4,100 (6.2%) Information and communication – 1,600 (2.4%) Financial & other business services – 15,200 (22.8%) Public admin, education and health – 22,400 (33.7%) Other services – 3,000 (4.5%) Total – 66,500</p> <p>(Nomis: Employee jobs, Ipswich (2013))</p> <p>Note: the figure above excludes self-employed and HM forces.</p> <p>There are 5,500 people self-employed (July 2013 – June 2014, Nomis)</p>
Unemployment	7.1% (East 5.4% Great Britain 6.8% , July 2013 – June 2014, Nomis)
Ethnic Group (non white British)	11% 2011 Census
Heritage	603 listed buildings, 10 scheduled monuments, 15 conservation areas and 3 registered parks, gardens and cemeteries

Average Annual House Build (2001 to 2014)	573 dwellings per annum (not including student and assisted living accommodation)
Average percentage of housing built on previously developed land 2001/02 to 2013/14	92.9%

Source: Ipswich Borough Council Local Plan – Core Strategy and Policies Development Plan Document Review Adopted 22 February 2017

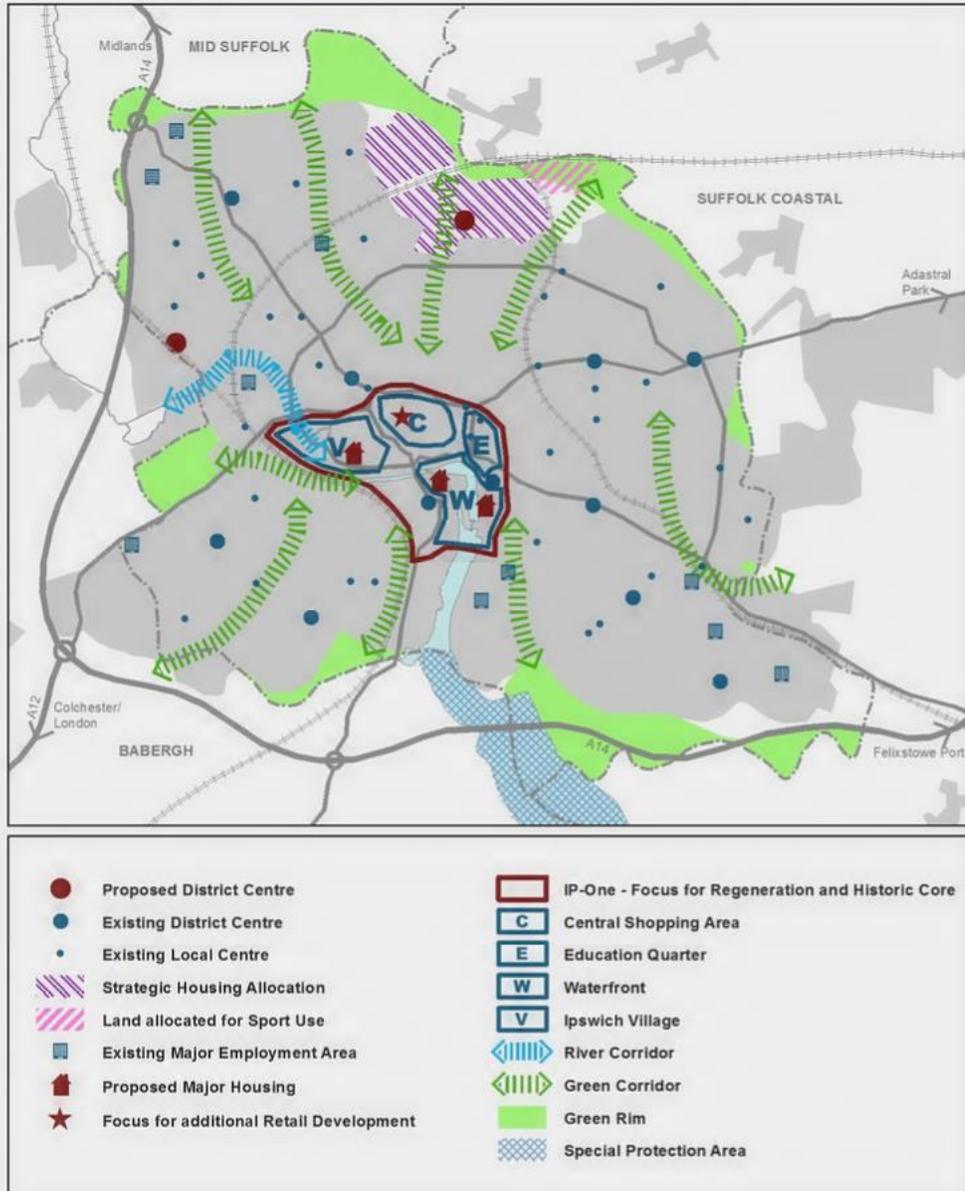
There then follows a brief description of both the current main areas of growth and how the town originally grew. This section finishes with a succinct list of the key challenges over the plan period. These focus on growth, regeneration and managing increased traffic demands, along with retaining and improving a skilled labour force and protecting and enhancing industry and businesses. Increasing resilience to climate change and managing flood risk are also issues, perhaps more important to a low-lying port town. The final issue is interesting as it discusses attracting private sector interest in the town, principally to improve the 'offer' to existing and new communities. Focusing on private sector investment as an issue really shows an understanding of how the place is not delivering as previously envisaged, and sets an interesting challenge as to how the plan can help address this issue.

'The Strategy' part of the plan moves onto the vision and objectives. The vision makes ten points all flowing from the issues raised in the context part of the plan. There is a focus on the town centre as a place to live, work and shop alongside conservation and enhancement of the historic environment and waterfront. Cycling and traffic management, open space and improved access to the waterside are all covered. Education and health facilities get specific mention, as does the garden suburb.

The 12 objectives get into a little more detail and provide a focus for meeting the issues and vision. This is as it should be. The plan will focus development on the IP-One (town centre) area and the IGS. Housing delivery gets its own objective, which includes the number and broad distribution. Accessibility and movement get their own objectives, as do climate change and reducing carbon emissions. In short, if you read this section, you will have a clear picture of what the plan is focusing on and where it will deliver. This is further bolstered by a section entitled 'Spatial Strategy – How will the vision and objectives be achieved?' Over a little more than two pages, this section really helps explain what is happening where and why. It usefully sets out the principles behind the model for growth, which follow on perfectly from the previous sections.

This part concludes with the key diagram (see below) and then the 19 strategic policies setting out how the main objectives will be delivered. The strategic policies set out the 'what' and where necessary the 'where'. As the whole of the next part of the plan deals with development management policies, these strategic policies provide a framework and don't get too bogged down in the 'how' question. Some are longer because they set out specific assets or locations for delivery. Overall they are as succinct as can be expected, with a proportionate amount of reasoned justification to help set the policy in context. Usefully, each policy also sets out which objectives it is implementing. This provides the reader with a constant reference back to the objectives and helps with the overall understanding of why the policy exists and what it is set up to achieve.

DIAGRAM 3: The Ipswich Key Diagram



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Source: Ipswich Borough Council Local Plan – Core Strategy and Policies Development Plan Document Review Adopted 22 February 2017

We think that for a plan to create a clear narrative and identify issues it has to:

Succinctly set out any 'vital statistics' of the area – these set the context for both the issues and the policy response to them

Understand how evidence and events shape the issues the plan has to address – especially in a revision/update to a plan, anything that has happened since the previous iteration that requires a change in focus for the new plan should be set out in an issues/challenges section

Describe not only the issues, vision and objectives but also how the strategy will meet the challenges and deliver the vision and objectives – a crucial part of the narrative is not just setting out what the issues are, but also how the strategy will tackle those issues. The Ipswich plan does this well.

State which objective(s) each policy supports – This helps everyone reading the plan not only see why a policy exists but also to keep the objectives at the forefront of everyone's minds. For Members in particular being able to see how a policy supports an objective should help in any conversation about the plan and future decision making.

3) How does the plan promote a diversity of suppliers and developers?

The overall strategy is a mix of garden suburb, town centre and edge-of-settlement sites, with quite a high, evidenced windfall allowance. This is a good basis for providing for a mix of suppliers and developers. The housing type and tenure policy sets out what the ongoing needs are for different types of housing including affordable housing and housing for the elderly. It sets out that all schemes of over 10 dwellings will be expected to bring forward a mix of types and tenure (with exceptions covered in criteria). This policy also sets out the support for self-build, custom-build and co-housing. This should provide additional confidence to suppliers and developers in these sectors that the council will support their proposals.

The IP-One policy area is further set out in an area action plan. This will provide additional certainty to developers about the mix and type of housing and other land uses being sought in specific locations. It bolsters confidence that there is a cohesive vision for the area and that it will be supported by the council. This is likely to make it attractive to prospective developers to bring sites forward.

The IGS is supported by a supplementary planning document (and an infrastructure delivery plan). These provide further detail on the sequencing of development. Phasing a large site is essential and will assist the various developers in planning for the delivery of their particular parcels. The plan policy sets out the size and location of various non-housing elements such as the country park, local centres and health and education provision. This all further supports the development community in being able to plan ahead for larger scale development and investment.

Employment land allocations of 35ha along with encouraging employment uses in the IP-One area show a commitment to businesses in, or looking to move in to the area. The link made to training and education will also provide opportunities to some developers or suppliers who operate in these markets. The focus on partnership with the private sector offers opportunities to draw more people into the conversation at the right time.

We think that for a plan to promote a diversity of suppliers and developers it should:

Allocate and identify as broad a range of site types as can be sustainably delivered

Identify phasing, key infrastructure and access requirements on strategic sites – make clear what (if any) further detail is being brought forward in a supplementary document, and when this will happen. Beware of ‘punting’ too much detail into the long grass. Future documents must come forward in a timely manner and contain only that which cannot be described in detail now.

Consider the contribution education and training can make to the economy – providing training facilities sends the right signals to developers that this is a place to invest in

4) How does the plan contribute to the delivery of strategic objectives?

Ipswich is part of a HMA that has agreed to align their plans more closely in the near future, and also will need to respond to the changes to housing calculation methodology signaled in the Housing White Paper. In similar situations many other councils have delayed their plans, adopting a “wait and see” approach. Ipswich have decided to go through with the plan process and accept that this will require their plan to be followed by prompt reviews. This shows a confident and proactive leadership who understand the utility of a current local plan.

As a bit of background, the council established an ‘Ipswich Policy Area (IPA) Board’ in 2007 to provide a forum for working on strategic issues. In 2013 this board resolved to address and meet the housing need of the whole IPA within the wider IPA. It is this work that will lead to a definitive housing need figure for the IPA as well as a set of either joint or aligned plans to set out how the need will be met across the IPA. This helpfully shows that although the work was not yet complete, there is a clear commitment and timeframe for it. This in turn means the other urgent matters needing to be addressed in Ipswich can be set out in the adopted plan now, without being held up by further work on housing need.

Part of the evidence base for the plan was a ‘Statement of Compliance’ with the Duty to Cooperate. This helpfully set the context for each of the key partners involved in discussions. It then goes on to detail the strategic issues that were discussed and what the outcome of the discussions was. This table has five simple headings:

- Strategic issue
- Management and working arrangements
- Evidence base
- Outcome
- Ongoing Co-operation

The management and working arrangements not only say who has been involved but, if appropriate, what documents they worked on. In other words, what was the form of the partnership. The outcome looks not only at whether there was a new policy or other planning document produced, but also what the outcome on the ground will be as well (where appropriate). The on-going cooperation column highlights where there is still further work to be done and what form that will take. This is helpful as cooperation must not stop with the adoption of the plan and this shows the ongoing commitment to resolve issues.

The whole document provides assurance that the strategic issues are not only identified and understood but also that solutions either have been or are being prepared. It covers all strategic issues, from housing and the economy to transport and the environment. Cross-boundary issues are not limited to buildings and transport corridors. Ipswich Council has demonstrated how this work can be done effectively.

We think that for the plan to contribute to strategic objectives the council should:

Ensure there are clearly referenced governance arrangements in place – if there is no strategic board or similar body, how will partners know who to contact or where they can discuss strategic issues together?

Keep looking up from the spreadsheets – there may be strategic issues related to the environment which will require a coordinated approach, both with Government agencies and local authorities. It is easy to lose sight of these when most of your time is spent looking at housing (and job) numbers.

Produce a statement of compliance as one of the examination documents – this should be a work in progress that is updated as and when issues are addressed, but the summary of outcomes and ongoing cooperation is essential to make this work.

Thoughts and reflections from Ipswich

Bringing together a Core Strategy (and development management policies) review and a new Site Allocations Plan

The Core Strategy Review started as a focused review just targeting housing and jobs figures. It evolved into a full review as it became evident that the scale of change and the need to respond to new evidence could arguably go to the heart of the plan. Nevertheless, large parts of the Core Strategy Review remained unchanged.

Changing to a full review had some positive outcomes. As we progressed through the preparation process, it became clear that some of the area-based policies in the Site Allocations DPD should really be combined with the DM policies in the Core Strategy for ease of reference. Thus we were able to consolidate some area-based elements from the Site Allocations Plan into revised development management policies in the Core Strategy.

Preparing the plans in parallel enabled them to be examined together, with resultant cost savings to the Council. It also provided maximum flexibility about how and when issues were considered at examination and meant that no topic was off limits to objectors (as it might be if a sites plan were being examined after a strategic plan had been adopted, for example). Therefore the approach resembled more closely a 'traditional' local plan.

Making best use of land

The approach to housing density in Ipswich was established through the 2011 Core Strategy and has been continued into the Core Strategy Review. Some adjustments were necessary, particularly for high density development, in the light of viability evidence and the impact on high rise development of the 2008 recession. The density of delivered residential development is monitored annually through the Authority Monitoring Report and fed into the review.

The overall low density approach at the Ipswich Garden Suburb masks some variation within the parcels of land, for example medium density around the district centre. The country park requirement helps to address a deficiency of natural/semi-natural greenspace in the north of Ipswich, as well as provide for the occupiers of the development, and was also driven by the Habitats Regulations Assessment of the Local Plan.

Diversity of suppliers

It should be noted that the Ipswich Garden Suburb SPD is separate from the Infrastructure Delivery Plan. Including the listing of key land use elements within the policy, together with the approximate area of each, has provided a useful baseline in negotiations with the developers. It involves an element of risk, as the detailed provision of some of the facilities has yet to be resolved through the planning applications and may need to be subject to some

adjustment. However, it was necessary to both fix the requirements within policy and provide some certainty to local objectors that infrastructure would be delivered.

The holistic approach to employment adopted by the Core Strategy Review both builds on the 2011 Core Strategy and reflects key partnerships within the town, such as City Deal and the Ipswich Vision. Skills levels and educational attainment are well-documented issues for the Ipswich workforce and, therefore, in planning for jobs growth, delivery will depend on a reasonable match between the jobs available and the skills needed.

Delivery of strategic objectives

Ipswich BC has embarked on the immediate Local Plan review now underway, because

- it is a clear message from the Government that planning authorities should be prioritising housing delivery;
- the Borough is under-bounded and does not have a five year supply;
- the Local Plan Inspector required us to do it; and
- our neighbouring rural districts are experiencing appeal pressures because of land supply issues and urgent need to review now.

This Local Plan review is the first opportunity that the Ipswich and its three neighbouring local planning authorities have had to align local plan timetables. It is not ideal timing for any of the four – probably sooner than IBC would have liked and later than neighbouring areas, however, the LPAs are being pragmatic and responsive to local circumstances and the national agenda about closer joint working on strategic, cross boundary matters.

The four LPAs have a history of joint work dating back to at least 2008 when a joint SHMA was commissioned. Following the preparation of a new joint Strategic Housing Market Assessment (published in May 2017), the Ipswich Policy Area focus has now switched to an Ipswich Housing Market Area approach. Thus, whilst the June 2016 Memorandum of Understanding between the Councils laid a good foundation for cross boundary working on the basis of the IPA, the approach is moving on and adapting.

The IPA Board remains in place as the forum for discussing cross boundary planning issues but it is not a decision-making group and consequently we are not yet at the point of producing joint plans. Ipswich BC and Suffolk Coastal District Council are currently consulting on a joint 'Part 1' strategic issues and options document, but other neighbouring districts have produced a separate consultation document, albeit that it is out to consultation at broadly the same time as Ipswich and Suffolk Coastal.

Where this 'aligned plans' cross boundary approach remains difficult is in the co-ordination of high level decisions about the appropriate scale of growth for each LPA in relation to its potential impacts on neighbouring areas and the infrastructure which would be needed to support it, and agreeing timetables which work for each authority. Strategic growth options work was undertaken on a Suffolk-wide basis at the start of the year outside the local plan arena. It was originally driven by a 'Devolution' agenda. However, in the absence of that

driver, decisions as to how this work may inform future progressed are yet to be finalised. It should be noted that due to the way in which the work was carried out i.e. not following any recognisable local plan process, it sits outside the local plan process and has an unclear status and role in local plan terms.

It remains to be seen whether or how the local plan reviews will need to reflect the work and whether a single county-wide team would be needed to take it forward as a strategic framework for Suffolk local plans.

What is certain is that Ipswich Borough Council will continue to work together with neighbouring authorities to support appropriate growth and ensure that development happens in a sustainable manner.

Martyn Fulcher

Head of Development

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