

Babergh & Mid Suffolk Joint Local Plans Programme

(Local Development Scheme for new Local Plan Documents)

2014 – 2016/17



Document version 1.0 (January 2015)

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BDC / MSDC Local Plan Programme (Local Development Scheme - LDS)

January 2015

1. Role and Purpose of this document (LDS)

Local planning authorities (such as Babergh and Mid Suffolk) are required, under the current planning system, to provide a publicly available programme and timetable of the future planning documents that they plan to prepare. This helps those with an interest in such Plans to identify those of greatest relevance to them and to get involved with their preparation. This is the latest in a series of previous such LDSs that the 2 districts have produced, in the past, separately. These LDS documents may be supplemented or updated through the provision of real time progress information, generally on the Councils' website planning pages.

Progress against the milestones and timescales set out in this LDS will be assessed and set out each year in the 2 Councils' combined authority monitoring report (produced to cover the period from start April – end March and now scheduled to be completed and published in May each year).

In addition, 'real-time' information on progress against the LDS will be provided on the Planning pages of the 2 Councils' websites.

This LDS replaces all previous LDSs / Local Plan programmes previously produced and issued by Babergh and Mid Suffolk Councils.

2. Combined Local Plan (DPD) Document Proposals: Strategic and Planning Context

Babergh and Mid Suffolk Councils have been developing an agreed process of integrating services over several years. Whilst remaining 2 distinct sovereign councils, they now have a single staff structure to serve the 2 organizations and members work together very closely. The 2 Councils' overall visions and strategic priorities proved to be very similar and have been aligned further recently¹. A key point of agreement is a shared focus on the planning and delivery of sustainable growth.

The 2 Councils also share a common footing of each having recently adopted Core Strategies, with Mid Suffolk achieving this firstly in 2008, followed by a focused review (incorporating NPPF compliance) adopted in late 2012. This plans to a time horizon of 2027 (with employment provision already planned indicatively to 2031). Mid Suffolk also an area action plan in place (for its largest urban area: Stowmarket) to provide a policy framework for its greatest planned urban concentration of growth. Babergh adopted its own Core Strategy in early 2014, with a time horizon of 2031.

The extent of progress and scale of investment already made for these Core Strategies during the service integration process indicated that the planning interests of the 2 districts would be served best by continuing and completing these 2 Core Strategies. Equally, planning and delivery of growth would also be best promoted in this way, with the benefit of

¹ See www.babergh.gov.uk/assets/Uploads-BDC/Strategic-Plan-2014.pdf for the current Joint Strategic Plan

up-to-date Development Plans in place as soon as possible. However, the progress of service integration allowed for some alignment of the 2 Core Strategies, with some key elements of the new Babergh approach incorporated within the Mid Suffolk Core Strategy Focused Review.² The Core Strategies provide the: spatial visions & objectives; growth targets for economic growth / jobs, homes and land uses such as key town centre uses; spatial development strategies (and bases for infrastructure planning); high-level / strategic policies; and some strategic land allocations / broad growth locations.

In October 2013 members of both councils agreed formally to produce a single planning policy framework for the future. In line with this, the councils are working to produce CIL systems for each district to a common approach within a single exercise. A single Statement of Community Involvement was identified as the first step necessary and this was adopted in early 2014³. Common Monitoring processes are now in place and the 2 councils produced their first combined AMR for the year 2013-2014.

3. Duty to Co-operate

A key factor here is that of the local Ipswich Policy Area context. With Ipswich Borough pursuing a fast track review of its current Core Strategy and timescale extension to 2031 (in the interests of growth planning / delivery) there is an imperative to co-ordinate development plan work with that for Ipswich (both districts sharing boundaries with Ipswich). Similarly, Suffolk Coastal district, the other IPA district, also shares an Ipswich boundary and work to prepare this DPD for Babergh & Mid Suffolk is being co-ordinated with that for Suffolk Coastal district. A key feature of this is work to review, update and agree objectively assessed development need across the IPA to a horizon of 2031. Looking beyond 2016 when this DPD is planned to be completed, the opportunity arises for all 4 districts to align development plans locally, potentially with a combined planning document.

4. Remaining Planning & Growth Requirements (scope of the proposed document)

The outstanding planning requirements to facilitate sustainable growth delivery and to complete the overall planning framework beyond the extant Local Plan part 1 Core Strategy documents are:

1. Up-to-date, combined and streamlined suite of new (NPPF compliant) development management policies (serving both districts in a single document).
2. Growth stimulation and sustaining existing rural communities within Mid Suffolk - through greater flexibility for village growth. This is another element of aligning the overall policy framework and needs to revise the existing Mid Suffolk settlement hierarchy / development strategy. This development strategy revision (taking the form of a highly focused change to the Core Strategy) also needs to extend the time horizon by 4 years to 2031, thus aligning with that for Babergh and providing a 15-year time horizon (2016-2031). This work would incorporate a fresh appraisal of

² See chapter 2 (strategic objectives); chapter 3 (Sustainable Development), including Policies FC1 & FC1.1; chapter 4 (Housing); chapter 5 (Employment)

³ See <http://www.babergh.gov.uk/planning-and-building/planning-policy/local-babergh-development-framework/statement-of-community-involvement/>

objectively assessed development needs for Mid Suffolk⁴; provide a means to deliver an anticipated uplift in growth requirements; and address 5-year housing land supply deficiencies. Plan-led *urban* growth for Mid Suffolk is already planned for, mainly through the adopted Stowmarket Area Action Plan (adopted February 2013).

- 3a. The need for a limited suite of new strategic site allocations, both to stimulate growth delivery and secure a planned future for some major (largely brownfield) sites within both districts.
- 3b. A review of other site specific / area designations and boundaries, again retaining these where an overall strategic importance is identified. Older / non-strategic site allocations are also being reviewed and retained where necessary or deleted if now appropriate

Collectively, these elements will provide a basis to replace or render redundant, all previous, saved Local Plan policies (of both districts) within a much more streamlined and focused planning framework. Building on work already done (e.g. comprehensive evidence base review and sustainability appraisal scoping completed, including external consultation on the latter) the Councils' agreed priority is to press ahead with this outstanding work to complete the overall planning framework, to focus on co-ordinated and effective growth delivery and to achieve this by 2016.

Community Infrastructure Levy (CIL) systems are also being developed for both districts, in tandem, through a common approach. These are scheduled for completion and implementation around April – mid 2015.

5. Conclusions

The overall approach to this DPD and its scope have therefore been planned pragmatically in order to achieve the following key objectives:

- Filling the gaps in the existing adopted planning framework to deliver a complete Local Plan framework as quickly as possible (reflecting NPPF emphasis on timely Local Plans within a Plan-led system). This is also to be facilitated by focusing tightly and limiting the scope of the new document
- Alignment of Plan-led approaches across the 2 districts, including the approach towards growth delivery
- Sustainable growth delivery (across the board) and sustaining Mid Suffolk's predominantly rural communities (and pattern of existing villages, together with pressured local facilities and services)
- Completion of the local planning framework in line with that of key neighbouring authorities with a longer term view towards 2016 when it is anticipated that closer Local Plan alignment will be required
- Reflecting the NPPF emphasis on limiting producing extra DPDs to a minimum and only with additional documents where essential

⁴ The Mid Suffolk Core Strategy was adopted before abolition of the RSS. Whilst a local SHMA was available at that time to provide an up-to-date assessment of objectively assessed development needs, the Core Strategy was completed and adopted in line with the extant RSS growth targets. Objectively assessed development needs are also being revisited for Babergh and the up-to-date position will be reflected within this Local Plan document

6. Summary and Profile of main planning document & other work outputs

Babergh and Mid Suffolk Joint Local Plan (part 2) document	
Subject and Scope	This combined document will complete the planning framework for the 2 districts, bringing all previous policies, designations etc. (where still required) into conformity with the National Planning Policy Framework. Reviewing growth requirements and approach (wherever necessary / appropriate), new strategic allocations will also be made to address a number of larger site issues
Geographical area	All of Babergh & Mid Suffolk
Status	Development Plan Document
Chain of conformity	Must conform with the National Planning Policy Framework and with the adopted Development Plan ⁵
Production arrangements	Led by Spatial Policy group, with input from all internal Council service groups and Suffolk County Council as appropriate. The SCI outlines how external parties and members of the public will be involved
Review and timetable	The Annual Monitoring Report (AMR) will assess the effectiveness of the policies contained within the Local Plan annually. This will be the main trigger for any subsequent policy review exercises or for additional policy preparation
Timetable for production	
Member approval (overall approach / member involvement arrangements etc.)	February – April 2014
Sustainability appraisal scoping report published for consultation	June / July 2014
Consideration of responses and amendment of SA scoping report	August – September 2014
Member (both councils) approval for Issues & Options content and public consultation exercise (reg. 18)	(mid) January 2015
Early stage document approach / content external consultation (Issues & Options)	January – mid March 2015
Consideration of responses and Draft Document preparation	February / March – May 2015
Member approval (draft / submission document)	July / August 2015
Publication Draft Local Plan document (and SA) for external consultation	August – September 2015

⁵ The exception on this is where any element of a new Plan supersedes or replaces that of an extant Plan

Formal Public consultation – Draft Plan	September-October 2015
Consideration of responses and amendment of Plan if necessary / SA scoping report	November / December 2015
Member consideration of responses, potential Plan changes and submission	January / February 2016
Submit documents and supporting information to Secretary of State	February 2016
Independent examination stage	February 2016 – end 2016
Inspector's report (provisional estimate)	October / November 2016
Adoption	End 2016
Post adoption procedures, rollout and any additional implementation measures	January/March 2017

Community Infrastructure Levy (CIL) Systems

The programme for development of new CIL systems for both districts is not included within this LDS as these processes are already at an advanced stage, having been timed and developed to follow the respective Core Strategy processes and their adoption. For up-to-date information on CIL in each district, the following weblinks may be used:

<http://www.babergh.gov.uk/planning-and-building/community-infrastructure-levy-cil-in-babergh/>

<http://www.midsuffolk.gov.uk/planning-and-building/community-infrastructure-levy-cil-in-mid-suffolk/>

7. Monitoring and review

Monitoring of Local Plan Documents

The development plan system is a continuous process with monitoring and review being fundamental aspects to the delivery of a successful plan. It is a requirement that an Annual Monitoring Report (AMR) will be produced and published annually and made available as soon as possible. The AMR will analyse the period of the previous April to March of the current year. The report will:

- Set out how the Council is performing in the production of documents against the timescales and milestones set out in the LDS;
- Provide information on how the strategies/policies/targets in the Local Plan are being achieved;
- Advise on whether any Local Plan documents need reviewing;
- Review progress on SPDs and whether any new ones are required or old ones withdrawn or reviewed (subject to the level of detail included in a LDS and whether it includes SPD level information);
- Advise on the need to update the LDS as appropriate; and
- Provide information on the 'state of the districts' particularly around delivery of new growth and development.

The LDS will be monitored annually, informed by the AMR and if necessary revised should changes be required.

Review of Local Plan documents

The AMR will provide information regarding the performance of each document as well as identifying areas where strategies/policies/targets are not being achieved. The outcomes will be dependent on a variety of influences such as changes to Government policy, or otherwise, pressures for or deficits of development(s) across the districts.

8. Evidence Base

Evidence Base: Broad Requirements and Purpose

The evidence base is both a key requirement and feature of the existing and new planning frameworks. It is necessary and beneficial in ensuring that the Plan's policies and proposals are positively prepared and built upon a sound base. This foundation involves research work and intelligence gathering work across a number of different broad themes and subject areas. The evidence base will also help in monitoring and review of the planning framework and this is provided for through the joint, (annual) authority monitoring report process.

A range of assessments, including sustainability appraisal, strategic environmental assessment and habitats regulations screening / assessments, forms an important element of the evidence base by providing a picture of the anticipated outcomes and effects of the proposed Plan. From the earliest stages from when the plan is initially conceived and subsequently develops, an iterative process of sustainability (and related) appraisals helps to shape and refine the Plan.

The vast majority of this work will now be undertaken in-house within the team itself and this helps with project management and control and in ensuring that those developing the Plan understand the ongoing, iterative process through which the Plan is assessed and refined. Other such assessments include equalities assessment, to ensure no discriminatory impacts on identified protected groups within society.

Evidence Base: Scope

The range of themes and subjects upon which evidence material will be required or beneficial is too broad to list fully. This spans considerations from environmental / physical factors like tidal or 'fluvial' flood risk, through economic considerations like assessments of local economies and town centre well-being, to social / health considerations such as needs for sport, leisure and recreation provision and facilities.

Evidence Base: Availability

As this work is progressed and completed across many different research projects and assessments, the documents and associated material will be published for free accessibility on the 2 websites:

<http://www.babergh.gov.uk/planning-and-building/planning-policy/local-babergh-development-framework/>

<http://www.midsuffolk.gov.uk/planning-and-building/planning-policy/local-development-framework/>

Please note that whilst some elements of the existing evidence base are separate and different (between the 2 councils) this will reduce and see increasing harmonisation / unification in future.

Evidence Base: Principles and Approach

There is a great wealth of information and material already published on the 2 websites that helps to make up the overall evidence base. This requires some review and rationalisation in order to consolidate it and make it more easily accessible and understandable.

Despite this, the important principle for developing an evidence base is that of proportionality.

Volume and complexity are not necessarily beneficial (and potentially a hindrance).

The Councils will accordingly seek to ensure that this principle is respected and used to guide all work towards developing (and updating) the overall planning evidence base.

Another important consideration is that of joint working, not only between just the 2 districts in their joint planning policy work, but equally the need to work together with a wider range of neighbouring local authorities and other partners.

This characteristic is already dominant as an approach through which the evidence base and its research is developed and delivered and this trend is likely to continue and develop further over time.

Evidence Base: Integration with other Strategies

Some evidence related documents will be used that were not produced explicitly or expressly for town planning purposes but nevertheless have a very important bearing on the plan preparation process, such as the Councils' agreed Strategic (and Delivery) Plan.

This helps illustrate the breadth and diversity of likely inputs and sources that will help to influence the emerging Plan.

Other strategies such as those for housing / housing delivery, economic development / regeneration; community oriented strategies are linked closely to Local Plans and their supporting documents. Local Plans provide a spatial dimension for many other such strategies and a means for their co-ordination and delivery.

9. Resources and Risk Assessment / Management

Resources – Professional Officers

Local Plan preparation (and supporting processes) will be led by the Spatial Planning Policy Team, as part of the Economy group, within Babergh and Mid Suffolk Councils.

This team covers Planning Policy and transportation matters / policy.

The team is led by the Corporate Manager (Spatial Planning Policy) who will be responsible for the overall project and policy direction.

The team (based across the 2 main HQ office bases) also includes nine (permanent) planning officers, who will be responsible for various elements of the Local Plan process and policy. Officers of related service areas, will also be heavily involved in the production of the Local Plan, working alongside colleagues from Suffolk County Council and other external partners.

Additional staff resources and expertise will be brought in to the process from time to time as required from other professional groups within the Council and outside agencies. A good example of this is the involvement and support of the (national) Planning Advisory Service⁶, whilst the associated CIL development work is being supported by collaborative learning run by the Planning Officers Society (Enterprises)⁷.

As a key project for delivery of the 2 Councils' Strategic Plan (and its current Delivery Plan) this major project is being supported by a multi-disciplinary team covering a range of Council-wide services and know-how. This will assist with project planning and management, plus resources and promoting wider involvement.

Risk Assessment – see overleaf

⁶ See <http://www.pas.gov.uk/>

⁷ See <http://www.planningofficers.org.uk/>

Risk Assessment and Management

Issue and level of Risk	Comment and proposed mitigating measures (Risk Management)
<p>Significant public opposition to plan proposals. Medium Risk <i>(high likelihood but potential impacts less certain to prove significantly harmful)</i></p>	<p>The production of the Local Plan and in particular the allocation of land is likely to be contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition. Where there is opposition to things that have already been determined within previous documents (the 2 Core Strategies and the Stowmarket AAP) there is little the Council can do without a full scale review. Even then the allocations have already been found to be most appropriate.</p>
<p>Inability of PINS to deliver examinations/reports to timetable. Low Risk <i>(likelihood appears low and risks considered manageable, and impacts generally not significantly harmful)</i></p>	<p>The Planning Inspectorate has been subject to cuts to its budget and changes in the way it works and the number of staff. PINS may have difficulty in providing Planning Inspectors at the appropriate times. If problems do occur, caused by factors outside the council's control, we may have to accept some slippage of the timetable. The LDS would need to be amended accordingly.</p>
<p>Loss/turnover of staff Medium Risk <i>(Likelihood unpredictable and relatively high in an employment market with increasing shortages of skilled Planners. Impacts likely to be harmful and difficult to manage or mitigate)</i></p>	<p>The Spatial Policy Team has some new appointees but significant staff turnover is generally a potential risk for planning services (within which delays and uncertainties in recruiting new staff invariably occur). In the past the programme suffered through the loss of a number of experienced officers and it sometimes proved difficult to replace them.</p>
<p>Financial shortfall Medium Risk <i>(Although resource environment is highly and increasingly constrained, this work can be planned and budgeted for, since it is regarded as high priority)</i></p>	<p>Any review of existing planning documents or producing new documents is a very costly exercise, involving preparation of an evidence base, production of documents, consultation and substantial examination (plus Programme Officer) fees. In previous years the Councils allocated funds through the general revenue fund budgets via the Service and Financial Planning process to allow for preparation of Local Plans. In the short – medium term, new homes bonus funds are available (subject to council decisions to allocate these). Additional Council expenditure will be subject to scrutiny in a highly pressured financial climate. Examination costs may inflate due to the</p>

	length/complexity of the Examination. This will be kept under review.
<p>Changing Political Priorities Medium Risk <i>(Political changes and changing priorities generally a risk, particularly with elections imminent and can be difficult to manage / mitigate)</i></p>	<p>The overall approach / content of this document / programme were considered and approved (in 2014) by the 2 relevant Committees which have a cross party representation of members. Elections in the districts (May 2015) could result in political changes and/or there could be changing priorities. Any future changes in the document(s) to be produced can be dealt with at the annual review. Despite this, the 2 Councils have developed a new strategic plan (and delivery plan) which offer some degree of certainty and continuity around the priorities and objectives the councils are pursuing</p>
<p>Further significant, external changes to Planning system Low-medium Risk <i>(Likelihood, given track record since 2010 is very high, plus the profile of the growth agenda and economic recovery. Some changes might not be addressed or overcome)</i></p>	<p>There is some uncertainty as to the current and any future Governments' plans for the planning system and planning policy. These and any prolonged uncertainty can affect ability to progress new Local Plans Mitigation measures relatively limited other than keeping abreast of new developments and best practise in response</p>
<p>Legal Challenge (especially successful challenge) Low – Medium Risk <i>(Likelihood unpredictable but increased substantially given the number and range of parties involved across 2 entire districts. Avoidance and mitigation measures possible but risk not necessarily avoidable; plus impacts extremely harmful and costly)</i></p>	<p>A legal challenge may be lodged to any Local Plan document within six weeks of adoption. Such challenges are becoming increasingly common. However, a challenge will only succeed if the Council (or Inspector) has made a mistake in procedure or in fact. To avoid a legal challenge, every effort will be made to ensure that procedures are followed and facts are correct.</p>

10. Relationships and Links with other Development Plans (and other Plans)

Local Plans produced by Babergh and Mid Suffolk provide one element of the wider overall Development Plan for an area such as this. For other planning matters including minerals and waste, the County Council is the relevant planning authority⁸. There is also substantial scope for local communities to produce their own community led Plans. All of these types of Plans and their relationships are described briefly in the table below.

⁸ See <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/Minerals-and-Waste-Planning/>

Other types of Plans are described below:

Type of Plan	Current / extant Plan document(s)	Produced by	Purpose	Relationship with district level Local Plan
Minerals Local Plan	Suffolk Minerals Core Strategy (DPD) (adopted 25/08/2008) Suffolk Minerals Specific Site Allocations (DPD) (adopted 24/09/2009)	Suffolk County Council	Countywide Development Plan framework specifically for minerals planning (a county council planning function)	The 2 types of Plan reflect the division of planning functions between county and district councils and are developed to be used in a complementary way May cross-refer to each other
Waste Local Plan	Suffolk Waste Core Strategy (DPD) (adopted 17/03/2011)	Suffolk County Council	Countywide Development Plan framework specifically for waste planning (a county council planning function)	The 2 types of Plan reflect the division of planning functions between county and district councils and are developed to be used in a complementary way May cross-refer to each other
(Local) Neighbourhood Plans	None yet made (adopted) but several in preparation ⁹	Local communities – generally Parish or Town Councils (in BDC/MSDC case)	Local level (statutory) Development Plan applying to a defined locality within district	(Local) Neighbourhood Plans are optional to produce Able to provide a greater level of focus for a defined locality on a wide or targeted range of matters Covered by legislation and own planning regulations Recognised in Babergh Core Strategy Policy CS2

⁹ For Mid Suffolk see: <http://www.midsuffolk.gov.uk/planning-and-building/community-led-planning/> for latest information
For Babergh see: <http://www.babergh.gov.uk/planning-and-building/community-led-planning/> for latest information

Other Community led Plans	Numerous Parish Plans, Village Design Statements, etc.	Local communities – generally Parish or Town Councils (in BDC/MSDC case)	Local level non statutory Plan applying to a locality within district	Other Community led Plans are optional to produce Able to provide a greater level of focus for a defined locality on a wide or targeted range of matters Recognised in Babergh Core Strategy Policy CS2
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