

BABERGH AND MID SUFFOLK DISTRICT COUNCILS

From: Head of Economy	Report Number: N131
To: Executive Committee Strategy Committee	Date of meetings: 7 April 2014 10 April 2014

STRATEGIC PLANNING POLICY DEVELOPMENT AND MEMBER INVOLVEMENT

1. Purpose of Report

- 1.1 To report back from the planned, short-term, Members working group process established in February to agree a basis for the future strategic direction and Member steering for combined planning policy related work outputs for MSDC/BDC.
- 1.2 In line with the above purpose, to set out for wider Member agreement:
 - An appropriate approach for officer / Member joint working in future in this regard, operating on a collaborative basis, that meets both service delivery needs and Member requirements to allow for their involvement in policy planning and its preparation.
 - An agreed overall programme of future planning policy work, including the main outputs / deliverables to be achieved.

2. Recommendations

- 2.1 That the proposed approach for future Member Involvement as contained in Appendix (a) be agreed.
- 2.2 That the proposed draft outline for the future planning policy related work programme, as contained in Appendices (b) and (c) be agreed.
- 2.3 That the Corporate Manager – Spatial Planning Policy be authorised to finalise / make revisions to the final planning policy related work programme referred to in recommendation 2.1 (and associated Local Development Scheme) unless such revisions are of a substantial nature. Further, that in the event that substantial changes are required, such proposed changes would be referred back to this same Members work group for agreement by the Corporate Manager in consultation with the Member work group.

The Committee is able to resolve the above matters.

3. Financial Implications

- 3.1 There are no direct financial implications, such as costs incurred in the decisions involved here. However, less directly, the decisions and choices to be taken are likely to influence the nature of financial receipts for the two councils in future. These revolve around financial incentives and rewards for growth delivery and accordingly, the detailed future work programme will need to factor in such considerations.

4. Risk Management

- 4.1 This report is not directly linked with any one of the Council's Corporate / Significant business risks. Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
Failure to agree and proceed with producing an up-to-date, NPPF compliant, local planning policy framework	2 (Unlikely)	3 (Bad)	Agree proposals and set clear route ahead to allow early progress to be made

5. Consultations

- 5.1 Discussions and internal consultations on this area include the following:
- Debate and outputs from Joint Scrutiny Committee on this matter
 - Discussions within Committee and Council meetings since late last year
 - The Transformation Enquiry groups process (TEGs), particularly the 4 external facing TEGs (Economy; Environment; Housing and Communities TEGs)
 - Joint Member Integration Board (meeting on 21 January 2014)
 - Resulting discussions within Portfolio holders group (MSDC) and Political Leaders Group (BDC)
 - A joint, cross-service, officers meeting to help support this process
 - The task and finish members group itself (working through a series of 4 meetings held especially for this purpose)
- 5.2 The agreed process for this report came via Executive and Strategy Committee meetings on 10 and 13 February 2014 respectively (Paper N110 refers).

6. Equality Analysis

- 6.1 Not applicable.

7. Shared Service / Partnership Implications

7.1 These have been highly instrumental in helping to set the backdrop to this report, including in particular:

- Agreement of aligned visions for each council, together with aligned strategic priorities and outcomes
- The planning service transformation and integration work, resulting in the agreed 'One Service' vision, including agreement to work towards a combined / single policy framework in future (providing for those differences or locally distinctive nuances where appropriate)
- The Transformation Enquiry groups process (TEGs), particularly the 4 external facing TEGS (Economy; Environment; Housing and Communities)
- The idea of joint planning policy development work with other local authorities is supported as a beneficial opportunity for Babergh and Mid Suffolk Councils

8. Key Information

8.1 The two Councils are now at a milestone stage of having 2 up-to-date Core Strategies in place (plus Stowmarket Area Action Plan). The time is therefore ripe for the Councils to consider what key areas of planning policy development and outcomes they wish to pursue from here onwards, together with the agreed principles / processes for preparing new policy work and outputs. Members are reminded they have already agreed to develop the policy framework together across both districts as part of the Planning transformation programme of work.

8.2 Members have developed significant ambition in relation to the sustainable growth agenda through the Transformation Enquiry Groups and all have called for a strategic review of the policy framework to understand how it can enable the delivery of growth in a timely way at the meeting on 29 October 2013. The TEGs work has been subject to substantial follow up work, including careful thought and efforts among officers to roll this out and to ensure that its main messages (such as the open for business ethos) are known widely, accepted and understood.

8.3 Demands, expectations and Member interest levels in outcomes from planning policy related activity (such as growth delivery, plus other stated aspirations) are very high, so the Spatial Planning Policy service needs to be in an agreed position to proceed without any unnecessary delay. In addition, the team is now in a healthy position to deliver, in terms of its strength (and capacity); has the remit and ability to make good progress; and to operate on a highly innovative basis. Much (delivery focused and preparatory) work is already underway but the medium - longer term / larger projects also need to be resolved in particular in order that their longer delivery timeframes can be managed and minimised.

8.4 The task and finish member group process worked to tight timescales but it is considered that the process has remained focused, made good progress and proven successful in achieving its objectives. The proposed future Member involvement approach and arrangements are provided at Appendix (a) with as much coverage as currently available.

The future draft planning policy work programme (and outputs) is set out at Appendices (b) and (c). Key tasks and outputs in this include:

- A new document of up-to-date planning policies for development management
- A highly limited set of land allocations (based on strategic site / growth locations) and other site specific / area based designations – where demonstrably required
- A range of site-specific planning briefs / masterplans and other thematic planning guidance (such as that for design quality)
- Limited review of existing Mid Suffolk Core Strategy policies (primarily the current settlement hierarchy to provide for more flexibility towards village developments). This will not be a focused review document, but instead incorporated within the above planning documents
- Other planning documents and new approaches will be required to implement the rural growth provisions (including supplementary planning documents). Part of this will be to provide a suitable alternative to the formal Neighbourhood Plans option

8.5 Further detail (on the work programme) will be developed in due course. It is suggested that consideration be given to less formalised committee approval processes for officers and Members to develop and agree the final form and content of a future planning policy work programme (resulting in a new agreed 'Local Development Scheme') in the near future.

9. Appendices

Title	Location
(a) Future Member Involvement Principles and Approach	Attached
(b) Draft outline Planning Policy Work Programme (Principles and Approach)	Attached
(c) Draft outline Planning Policy Work Programme – schedule of tasks and deliverables	Attached

10. Background Documents

10.1 None.

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Future Member Involvement - Principles and Approach

- A1. Strategic Emphasis
The emphasis of future Member involvement will be on a strategic level of interaction and steering future planning policies and their aims, intentions and desired outcomes
- A2. Working Culture
The approach will be as collaborative, constructive and positive as possible, based on making every effort to build mutual trust and respect and create and maintain a joint working culture
Officers will undertake to avoid any planning jargon, or unhelpful technical language as far as possible in order to ensure the most effective basis for future collaborative officer / Member working
- A3. Governance
The convening of purpose-built, temporary, joint, member-officer working groups for policy development (on an ad hoc, flexible basis for each policy issue as required) will be the agreed approach (as approved by Strategy and Executive Committees). Any substantive changes to current governance arrangements (such as new committee structures) therefore do not form part of this remit
Under the constitution, the parent Committees for this activity will remain as Strategy Committee (BDC) and Executive Committee (MSDC), who have designated responsibility for future policy making and decisions. At present a Member working group is carrying out review work on some current constitutional arrangements
- A4. Speed of Delivery
Timely progress to achieve successful delivery is also critical (for example, in this sense, time taken to deliver growth outcomes will influence financial incentives / rewards). Consequently, any agreed process(es) to engage members more fully need to ensure that there is no delay to progress
- A5. Practical Arrangements
Given the above principles and the transformation agenda, in developing future planning policy work outputs, the creation of long-term or permanent committee-like structures will not occur. Instead, relatively short-term task and finish groups will be the preferred approach, operating as follows:
- Planned project group principles and working arrangements. A key principle of this will be that of bringing together those who need to be

involved for a particular subject area, including both key officers with the required knowledge and expertise in any given area and those members with the appropriate portfolio(s) or other relevant input. These could bring in others with relevant expertise and inputs as necessary, including external parties (see cross-reference in Appendix B8)

- Such groups will typically need to be assembled, organised, meet and work quickly, with minimal bureaucracy and delay. Member representatives will be identified and chosen swiftly on a case by case basis (according to the nature of the issue / involvement desired) and with reference to political leaders. If working group membership needs to be larger than a single discussion group size, officers will make arrangements for breaking down into smaller discussion groups
- A focus on a particular theme of planning policy (such as housing policy; economic development policy or retail / town centre policies). For such thematic work, the working approach will be highly focused (using no more than about 2 meetings) ensuring that swift progress can then be made in developing that area of future policy
- The other type of planning matter to cover will be where it covers a particular geographical area (such as a town centre, a major site / growth area, or particular village(s)). In such cases, clearly the involvement and role of those ward members will be very important
- The above may include major developments like Nationally Strategic Infrastructure Projects (NSIPs - where BDC/MSDC have a role as consultees, instead of as decision-maker). In such cases, use of this member-officer working group approach can be anticipated to occur
- For (geographically based) 'place-shaping' type groups with member involvement / representation, it is anticipated that such groups may need to endure for longer (given the lifespan of complex, major development projects). However, it is also suggested that in such cases, the approach would best be to ensure that group meetings are convened at key project milestone or decision stages, rather than by set routine arrangements
- In such area-based cases there is also scope for 'catch-all' provision for wider involvement, such as where place shaping groups operate and choose to hold public engagement events open to all (this occurs already)
- Officers will look to provide a supported and well-structured process, and accordingly ensure that: meetings are informed by discussion papers setting clear working group objectives; the relevant evidence is available and summarised; along with the applicable national (or other) policy, guidance etc.; or similar inputs, such as best practise used elsewhere. It will also be necessary for officers to explain identifiable risks (such as policies conflicting fundamentally with national policy; documents failing at examination or legal challenge dangers)
- These Member involvement arrangements will be held well in advance of formal committee meetings wherever possible

Appendix (b)

Proposed New Draft Planning Policy Work Programme

Guiding Principles and Approach

- B1. Less volume and complexity of formal policy documents / policies in future as far as possible. New policies and guidance to be developed much more quickly, allowing for quicker review and refinement as and where necessary
- B2. With agreement already reached to create a joint / combined new policy framework in future, the default position will be a single policy approach. Individual, separate policy work (for either single council area) will only be pursued where there is a specific need, justification or benefit in doing so
- B3. It will be very important to also employ principles and approaches for effective policy rollout, publicity and implementation / support, since the effective use of policy can be at least as important as what is actually produced
- B4. Future new policy framework to flow from and reflect the aligned new BDC/MSDC corporate strategic priorities, in content, approach and as far as possible in format
- B5. Future policy preparation work will need to respect some vital planning system tenets, such as ensuring the soundness of emerging Development Plans through examination; compliance with National Planning Policy Framework generally; the evidence based nature of the system; and meeting the Duty to Co-operate. Accordingly, it is likely that further Member planning training will be necessary, requiring early consideration of how this is to be both delivered and subsequently maintained

Future planning policy development work will be preceded by a review of what Plans, policies, guidance etc. are already in place (locally and nationally) to ensure that the existing policy framework is understood clearly, deployed better and to avoid any potential duplication arising through calls to produce what already exists

- B6. The draft work programme presented at this stage allows for further decisions and refinements to be made about elements of its content and detail
- B7. It is clear that the potential demands on the policy service and on deliverables / outcomes are extremely substantial and accordingly careful prioritisation and detailed timescales will be required and in some cases expectations may need to be managed
- B8. In line with this approach, it is suggested that the benefit of external inputs, assistance and advice should continue to be included and used wherever necessary. Equally, drawing upon best practise elsewhere (such as through other local authorities) offers similar benefits and will be helpful

The following sections provide a lead in to some outstanding issues that will require early attention across both councils, together with a recommended way forwards. These involve the need to develop and apply a strategic approach towards major policy areas and themes. In these cases, given their important role within future

planning policy work and a new policy framework, it is likely that new joint member-officer working groups will need to be set up to address these matters, working in the new approach outlined above. This activity should be planned and launched in the near future and will need to work to similar aims and approaches across both council areas.

B9. Community Planning (and Neighbourhood Plans) – Rural Areas

Overall Objective: To agree an effective and pragmatic approach to growth planning and delivery (and the identified TEG outcome to achieve significant uplift in housing delivery levels, in line with the NPPF) for the two districts – within the rural areas

Whilst it seems likely that about 10 (5%) of the 200 BDC/MSDC parishes/communities are working towards developing Neighbourhood Plans for their respective parish areas, the scale of the task to cover the remaining 190+ parish areas is so substantial and pressing, that clearly prioritisation of scarce resources available to BDC/MSDC is vital. It is therefore recommended that a strategic level resource decision needs to be taken and an agreed approach applied now in this respect

The overall proposed approach is recommended to be as aligned as possible between the 2 districts. However, there are some important distinctions requiring additional work and resource to be invested for Mid Suffolk (whilst Babergh is more ready to proceed in this area). That investment will be required to review the existing settlement hierarchy approach and provide the greater flexibility desired for rural growth and to develop a new approach. Even if this is based closely on the approach developed within Babergh, this will still be a substantial piece of work. The key points are as follows:

Review of MSDC C/S settlement hierarchy policies to provide more flexibility for village growth and developments, including the current headline level figure of 750 homes (2012-2027). It is recommended for planning purposes looking ahead, that this 750 homes figure should not be treated as a ceiling but as a minimum figure. This could potentially include interim arrangements towards relaxation of that 'target' figure and progress towards it in the short-term (supported by the NPPF objective 'to boost significantly the supply of housing') and / or a short-term focus on bringing forward some of the 750 rural homes already allowed for (in MSDC C/S). However, it may prove to be the case that suitable sites are very difficult to identify and approve under the prescribed terms of the current policies (unless the planning departure route is to be pursued). There may therefore be delays in any growth delivery from this policy area for Mid Suffolk but there are also some large rural sites that may be able to deliver growth (subject to the complexities and obstacles involved).

Those communities in MSDC and BDC areas pursuing Neighbourhood Plans may remain largely unaffected by the review arrangements outlined above and the planning / delivery approach being developed within Babergh, since they have a chosen aim to plan for their own future and may put in place some local arrangements towards doing so.

Those communities (both districts) will continue to receive the benefit of the responsibilities / duties given to district councils for NHP preparation (which are already very substantial). No additional support (either financial or in kind) would be provided unless there are special circumstances and justifications for doing so. Such cases might include exceptional circumstances where there are highly complex issues to address (of a greater than local nature), including major and complex, brownfield sites and/or significant infrastructure issues to resolve. Clearly, where significant local change and growth is being pursued, this may represent another such justification for assistance above and beyond the standard prescribed duties of local planning authorities (district councils). BDC/MSDC officers have already provided much support above this level to date. However, that was during the absence of any strategic decisions within this area and prior to developing a highly demanding future planning policy work programme

Within Babergh, the focus will be on implementing the new Babergh Core Strategy and Policies within its rural areas (which already has a newly developed, positive and flexible approach towards rural growth and development). This planned for 1,050 rural areas homes, but it is similarly recommended that for planning purposes looking ahead, this (1,050) homes figure should not be treated as a ceiling but as a minimum figure. This work is anticipated to include:

- Immediate / short-term: internal DM officer / other services practitioners guidance on implementing the new rural growth and associated policies
- This will be supported by the evidence base, including that on local parish profiles, previous / planned developments and the up-to-date / future position on infrastructure provision
- Short-term: developing that guidance into supplementary planning guidance for public use and wider understanding
- New local community engagement processes to promote a dialogue about local growth and development and the options available for delivering it

B10. Community Planning (& Neighbourhood Plans) – Market Towns

Overall Objective: To agree and deliver an effective and pragmatic approach to growth planning (and the identified TEG outcome to achieve significant uplift in housing delivery levels) for the two districts – within the market towns

- Stowmarket: planning coverage already provided by (recently adopted) SAAP and series of emerging site planning and development briefs
- Needham Market: is pursuing a NHP, which would appear to be the chosen means to address the planning issues of local interest / concern
- Eye: Possible NHP but position complex, as very substantial planning work already in place for Eye airfield (including major employment location, plus identified location for 200 homes)
- Sudbury: NHP not currently anticipated. However, existing Sudbury Steering Group provides an equivalent forum / basis to address key local planning issues (with 3 major town centre locations currently under review). Beyond this, it is anticipated that only work to explore / plan for town centre expansion is necessary (as provided for by new Babergh Core Strategy)
- Hadleigh: NHP has been considered initially but not yet determined which option to be preferred locally. Local consultation work likely to make this

clearer during Spring 2014 and some follow up planning work may be required to help deliver local planning objectives

B11. Community Planning (and Neighbourhood Plans) – Overall

Overall Objective: To identify and provide an effective and pragmatic approach towards growth planning and delivery through community-led planning initiatives, including a suitable, balanced alternative to the formal Neighbourhood Plans option

- The Babergh Core Strategy (policy CS2) includes a provision to take into account any Community, Parish or Neighbourhood Plans in considering planning and development matters
- It is considered that equivalent policy provisions should be developed and used further in future (including for MSDC area). This provides a useful way in which those communities who have produced their own parish / community plans to date could gain some recognition and accreditation of their agreed local community stance on planning matters
- These parish plans will require some revisiting to gear their approach, content and means of preparation more towards a local document that is capable of practical application to planning processes

B12. Supporting Strategies

Development of over-arching strategies for preparation of major policy areas to inform policy aims, objectives and accordingly their implementation and delivery (provided such strategies are delivered effectively) can prove highly valuable. This is confirmed by the NPPF, which requires such strategies within a number of areas. It is accordingly recommended that early consideration be given to the need for strategy development to fill identified gaps within the following areas:

- Homes
- Economic Development / Tourism (only insofar as may be needed to complement NALEP sector growth strategy and Suffolk Growth Strategy locally)
- Heritage
- Broad sustainability & climate change issues (including renewable energy, among many other issues)

These will both inform policy development and support its implementation. To be effective such strategies need to be:

- Evidence based
- Capable of swift production and approval (and review / revision)
- Concise and easily understood
- As simple and clear as possible
- Prepared and put into effect with minimal complexity of process

Work Programme – Proposed new Planning Documents and Tasks

	Document (or other equivalent initiative)	Area covered	Purpose / Other	Timing / Delivery
A	Generic			
1	Community Involvement (SCI)	Both districts – single document / approach	Sets approach / processes for community involvement in planning	Completion: Spring 2014
B	Main / strategic Plan documents			
1	Babergh Core Strategy	All of Babergh district	Strategic planning framework for 20 years	Adoption: end February 2014 Publicity, rollout and implementation stages to follow (Spring)
2	DM Policies Plan document	Both districts – single document / approach	Up-to-date DM policies for all proposals (other than where site-specific and covered elsewhere) To supersede all remaining policies from MSDC and BDC Local plans	Not yet programmed (fast track preparation likely)
3	Limited, strategic site specifics & allocations doc	Both districts – single document / approach	<p>Include review of MS Settlement hierarchy approach + as below <i>Growth delivery: 750 homes – potential to increase</i> Provide clear framework for Babergh rural growth (for all rural clusters) <i>Growth delivery: 1,050 homes - potential to review</i> [To exclude areas subject to Neighbourhood Plans and urban areas (these generally covered by existing Plans)]</p> <p>Address and allocate any growth needed in IPA (edge Ipswich, linking with all IPA local authorities) as result of possible Ipswich overspill Allocate: Eye airfield; land E of Sudbury (500 homes) Review / revise Cedars Park employment allocation? Can plan any new strategic allocations required as result of scheme failures elsewhere or other changes of circumstances</p>	Not yet programmed (delivery timescale uncertain at present)

C	Guidance to support new planning policies		Required to ensure successful policy implementation	
1	Affordable Housing Guidance	(All of) Babergh only	New SPD to support new Babergh Core Strategy policies Needed to drive affordable homes delivery in short term Approach could be tested for MS area Needs to cover viability considerations (internal work also required to develop processes for this)	Completion: end February 2014
1A	Affordable / other Housing Guidance	(All of) Mid Suffolk only	New SPD to support any new MS area planning policies Needed to drive affordable homes delivery in short term Needs to cover viability considerations (internal work also required to develop processes for this)	
2	Rural Areas Growth Guidance (village housing developments) <i>Will develop into SPD</i>	(All of) Babergh only	New SPD to support new Babergh Core Strategy policies Needed to drive (rural) homes delivery in short term Approach could be tested for MS area	Work started (progressing well)
3	Possible new sustainability guidance	Both districts – single document / approach	To support new DM policies document Can cover renewable / low carbon energy and other sustainability issues	To follow DM policies document
D	Other site-specific planning work (non Plan based)			
1	G and T Transit / short stay site selection exercise (evidence base only)	Both districts – single approach	Address unauthorised G and T encampments To guide early planning application(s) Delivery objectives from needs evidence Planning approach agreed county-wide <i>No impact on growth agenda</i>	Late 2014 Refer Julie A T for progress
E	Supporting guidance - quality of development / local distinctiveness			
1	Place shaping / design guide	Both districts – single document / approach	<i>Should serve to promote growth agenda by raising development quality and local acceptance of new development</i>	Not yet programmed
F	Site / Area specific guidance			
1	Eye airfield PPS	Eye Airfield	Rollout PPS and progress to allocation <i>Address housing allocation issue (200 homes) – early delivery?</i>	

2	Development Brief (major / large-scale)	Mill Lane employment site, Stowmarket	Implements SAAP requirements and to steer early planning application(s)	Completion: Spring 2014
3	Development Brief	Stowmarket north – The Ashes	Implements SAAP requirements and to steer planning application(s) <i>Growth delivery: 400 homes</i>	Not yet programmed
4	Development Brief	Stowmarket south – Farriers Way	Implements SAAP requirements and to steer possible early planning application(s) <i>Growth delivery: 125 homes</i>	Commencement Jan/Feb 2014 – good case to accelerate delivery timescale
5	Masterplan (to be approved) (major / large-scale) – <i>needs advance guidance from Council</i>	Chilton Woods (Sudbury) (strategic allocation)	Implements BDC Core Strategy requirements and to steer planning application(s) Developed with local community / other interests <i>Growth delivery: 1,050 homes (approx.)</i>	Not yet programmed
6	Masterplan (to be approved) – <i>needs advance guidance from Council</i>	Hadleigh east (strategic allocation)	Implements BDC Core Strategy requirements and to steer early planning application(s) Developed with local community / other interests <i>Growth delivery: 250 homes (approx.)</i>	Not yet programmed
7	Masterplan (to be approved) – <i>needs advance guidance from Council</i>	Ipswich fringe (strategic allocation)	Implements BDC Core Strategy requirements and to steer early planning application(s) Developed with local community / other interests <i>Growth delivery: 350 homes (approx.)</i>	Not yet programmed
8	Masterplan (to be approved) – <i>needs advance guidance from Council</i>	Brantham regeneration site	Implements BDC Core Strategy requirements and to steer early planning application(s) Developed with local community / other interests <i>Growth delivery: unknown yet</i>	Not yet programmed
9	Town centre expansion planning work New option	Sudbury town centre	Implements BDC Core Strategy objective to expand, and promote vitality and viability Form, status to consider (free-standing or include within document at B3 above?) <i>Further growth opportunities to identify?</i>	Not yet programmed
10	Masterplan / action plan New option	Hadleigh town	Address a range of locally identified objectives (Mainly Hadleigh Town Council) <i>Further growth opportunities to identify?</i>	Not yet programmed
G	Infrastructure Delivery System			
1	Community Infrastructure Levy	Both districts – single methodology / approach		Work underway – see detailed programme

Note: Items in grey text above are those that have been completed since first draft of this work programme

Other current / future work

- Evidence Base Production / Update: Green infrastructure research and strategy for Mid Suffolk, inc. leisure, sports, open space and recreation research
- Brief Concept Statements to be produced for site proposals subject to early approach to Council

Areas subject to Neighbourhood Plans

- Lavenham; Elmswell; Thurston; Mendlesham; Needham Market; Eye; E Bergholt [latest position tba]

¹ Ipswich Policy Area

Includes: Claydon, Barham, Blakenham and Bramford (subject to imminent discussions with ward members about future planning and major developments in these areas); plus parishes in Babergh

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