

## BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

<b>From: Assistant Director – Planning for Growth</b>	<b>Report Number: S20</b>
<b>To: Executive Committee Strategy Committee</b>	<b>Date of meeting: 6 June 2016 9 June 2016</b>

### NEW JOINT LOCAL PLANNING FRAMEWORK: LOCAL DEVELOPMENT SCHEME

#### 1 Purpose of Report

- 1.1 To seek approval of the Local Development Scheme (LDS), to note the outturn for housing completions for 2015/16, to consider whether interim arrangements are required to provide and maintain a Five Year Supply of Housing and to request that governance arrangements are introduced for effective decision making to maintain the Council's progress in producing a Joint Local Plan.

#### 2 Recommendations

- 2.1 That the Local Development Scheme be approved;
- 2.2 That the outturn for housing completions for 2015/16 be noted;
- 2.3 That the actions at paragraph 10.11 and 10.12 be noted for the purposes of dealing with the Council's five-year supply of land for housing;
- 2.4 That Full Council be requested to make provision for governance arrangements for managing the Local Plan programme.

#### 3 Financial Implications

- 3.1 There are no direct financial implications arising from the immediate decisions involved in this report. However, the production of the Joint Local Plan will commit the Council to considerable ongoing expenditure, which for the most part can be found within existing service budgets for staffing and production of technical evidence (especially through consultancy work). In addition, there will also be "one off" costs to be found, particularly in connection with the submission of the Joint Local Plan for inspection and "Examination in Public" (EiP). This is mainly incurred in publicity, printing the final documents and meeting the costs of the Inspector and the Programme Officer at an EiP.
- 3.2 It is estimated that most of the costs of the producing the Joint Local Plan will be felt in the current financial year (2016/17) and the following financial year (2017/18). The costs associated with producing the Plan in the current year are mainly for completing the Councils evidence base, in respect of demonstrating the needs to be met and the capacity of the District to address those needs and secondly, to test the growth scenarios, particularly against sustainability appraisal criteria and transport modelling. It is anticipated that the costs for 2016/17 can be met through a combination of

the “carry forward” of last year’s unspent Local Plan consultancy budgets and this year’s current budget provision.

- 3.3 The expected costs in 2017/18 will be in consequence of printing, further modelling, public consultation and the EiP. These costs are currently estimated to be approximately £150,000 shared between both Authorities and will be requested as part of the annual budget setting process carried out later this year.

#### **4 Legal Implications**

- 4.1 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare Local Plans. The Town and Country Planning (Local Planning) (England) Regulations 2014 set out the procedures to be followed in the preparation of such Plans.

- 4.2 Planning law requires that where Development Plan policies are relevant to planning applications, decisions in determining these must be made in accordance with the adopted Plan, unless material considerations indicate otherwise. The legal planning decision framework therefore relies on Councils having an up-to-date Development Plan framework in place.

#### **5 Risk Management**

- 5.1 This report does not link to any risks on the Significant Risk Register. However, key risks are:

<b>Risk Description</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigation Measures</b>
Delays & threats to progress & delivery	Low likelihood as changes/delays can usually be predicted and mitigated	Impact is likely to be serious (bad) and long lasting.	Robust project plan (LDS) produced and monitoring to be introduced.

#### **6 Consultations**

- 6.1 The new Joint Local Plan will be developed in an inclusive and collaborative way through officers across the Councils’ own services working closely with Members (of both Councils), with communities (of all sectors and areas) and with neighbouring Local Planning Authorities/statutory organisations and other relevant infrastructure providers, all of whom participate in the planning process.

- 6.2 Officers will continue to work closely with Members to develop the draft Joint Local Plan for consultation with all local communities. In this respect, a programme of engagement has been designed to inform communities by describing the process, aims and proposals for delivering new jobs, homes and infrastructure in support of existing and new communities. All consultation will be carried out to reflect the Statement of Community Involvement (SCI) and joint communications strategies.

- 6.3 The programme of engagement will commence following consideration of this report and will be designed to inform and prepare communities about the process of developing the Joint Local Plan and the way in which they might become effectively involved in contributing to the content of the Plan.

## **7 Equality Analysis**

- 7.1 As the planning framework progresses and develops towards an agreed form, equality analysis will be required and carried out at the appropriate time.

## **8 Shared Service / Partnership Implications**

- 8.1 The preparation of a planning framework jointly across both councils reflects the well-developed and continuing service integration and transformation process between Babergh and Mid Suffolk.

- 8.2 The Joint Local Plan is being developed alongside a broader, strategic planning and infrastructure process to cover all of Suffolk (the Suffolk Planning and Infrastructure Framework - SPIF). Although the 2 processes are separate, there will need to be a high degree of coordination between the two. This interaction and relationship alongside other collaborative planning activity with immediate neighbouring Local Planning Authorities (i.e. The Ipswich Policy Area), is being planned to meet the requirements of the Localism Act, national planning policy and planning guidance. The draft LDS takes into account, so far as is possible, the likely/indicated milestones in the development of the SPIF and any emerging joint planning arrangements in the Ipswich Policy Area (IPA)

## **9 Links to Joint Strategic Plan**

- 9.1 The Joint Strategic Plan includes the following Priority Areas:

- Economy and Environment,
- Housing,
- Strong and Healthy Communities.

- 9.2 These Priorities are to be delivered through a number of strategic outcomes, as follows:

- Housing delivery – More of the right type of homes, of the right tenure in the right place;
- Business growth and increased productivity – Encourage development of employment sites and other business growth, of the right type in the right places and encourage investment in skills and innovation in order to increase productivity;
- Community capacity building and engagement – All communities are thriving, growing, healthy, active and self-sufficient;
- Assets and investments – Improved achievement of strategic priorities and greater income generation through use of new and existing assets.

- 9.3 The production of the Joint Local Plan will significantly contribute to the delivery of these outcomes.

## **10 Key Information**

### Background:

- 10.1 At your last meeting, Members resolved, amongst other things to commence the preparation of a new Joint Local Plan for Babergh and Mid Suffolk Councils, having a term of 20 years (until 2036). In consequence of those resolutions, it was also agreed that a new project plan for completing the Joint Local Plan, known as a Local Development Scheme (LDS) would be prepared for consideration by Committee.

### Local Development Scheme:

- 10.2 As mentioned above, the Council is required to prepare a Local Plan. Moreover, the Council is also obliged under the current planning system, to provide a publicly available programme and timetable of the planning documents that they intend to prepare. This helps those with an interest in Local Plans to identify the documents of greatest relevance to them and to get involved with their preparation.
- 10.3 A draft of a new LDS is attached at Appendix a. This LDS replaces all previous LDSs/Local Plan programmes previously produced and issued by Babergh and Mid Suffolk District Councils. It should be noted that where possible, LDS documents should be supplemented or updated through the provision of “real time” progress information (usually on the Councils’ website).
- 10.4 There are a number of notable milestones within the new LDS. Much of the early work of preparing the Plan (from June until September) will be taken up with completing the evidence base, particularly in respect of the completion of the Employment Land Review, an update of the Strategic Housing Market Assessment and a likely additional round of “Call for Sites”. It is expected that analysis of this information will take place from October to December, which together with other work, will lead to the production of a detailed draft Local Plan document for consultation (in compliance with Regulation 18 of the Town and Country Planning Local Plans Regulations 2012) in early 2017. Following consultation on the draft Plan, a final version of the Plan will be drawn up and published for submission to the Planning Inspectorate
- 10.5 Progress against the milestones and timescales set out in the LDS will be assessed and set out each following year in a combined Annual Monitoring Report (AMR) which will be produced to cover the a 12 month period from April to March each year. The AMR is usually scheduled to be completed and published in May each year.

### Annual Monitoring Report 2015/16:

- 10.6 The AMR provides information on key areas of planning performance across Babergh and Mid Suffolk Councils and the new AMR will cover the period from 1st April 2015 to 31st March 2016.
- 10.7 The objectives of an AMR are to:

- Report on the progress made in producing the key Joint Local Plan documents;
- Report on our Key Indicators (this is what we measure to see how well we are performing) and the progress made towards delivery against the targets set out in our Local Plan documents;
- Report on the use and implementation of our adopted Local Plans and Saved Policies;
- Report on any financial receipts obtained via implementation of the Community Infrastructure Levy. This came into law in 2010 and is the current method of charging all new development to make cash contributions towards essential infrastructure;
- Where a Local Planning Authority has co-operated with another such Council or a County Council, or a body or person under section 33A of the Planning and Compulsory Purchase Act, 2004, our Monitoring Report must give details of what action they have taken.

10.8 A total of 304 dwellings were built in Mid Suffolk in 2015/16, whilst in Babergh, 157 dwellings were built in the same period. Analysis of the level of planning permissions granted for the last year and the anticipated level of uptake of those permissions is presently being undertaken and Members will be updated in relation to the expected position in respect of the five year supply of land for housing at your meeting.

#### The Five Year Supply of Housing Land

10.9 The National Planning Policy Framework (NPPF), at paragraph 47, advises that Local Planning Authorities should:

“identify and update annually a supply of specific deliverable<sup>11</sup> sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.

10.10 Therefore, in the event of persistent under delivery, the Council would be expected to bring forward sites from later in the Plan period. However, in the case of both Councils, there are insufficient allocations later in the plan period to be brought forward, to a degree that would reinstate a five year supply. Under these circumstances, the provisions of the remainder of the NPPF apply, including paragraph 14 (a general presumption in favour of sustainable development) and paragraph 49 which states:

“...that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”.

- 10.11 In the event that either Council is unable to demonstrate a five year supply of land for housing, in the interim (until a Local Plan is approved), it could provide a more pro-active encouragement of early applications for sites which appear to be viable and sustainable and which can be delivered early. The settlement hierarchy for the District set out in the Core Strategy will be relevant to identifying those settlements which might accommodate sustainable development.
- 10.12 Where the absence of a five year supply is an issue, new sites which are beyond established settlement boundaries may also need to be considered. Therefore the contents of the Strategic Housing Land Availability Assessment (SHLAA) may become relevant, along with the outcomes from any further updating of the sites availability position. Any encouragement of sites is likely to need active and clear dialogue with relevant Parish Councils including those already starting Neighbourhood Plan preparation.
- 10.13 In the medium term, officers will continue to prepare the new Joint Local Plan which will include the sites allocation work and development management policies to provide criteria for assessing applications for planning applications.

Governance:

- 10.14 As the volume of work increases in the preparation of the Joint Local Plan, so will the level of reporting and number of decisions required to keep the programme on course. At present there are no mechanisms for the notification and approval of aspects of plan development, including option assessment, scenario planning and impact assessment. This amounts to a considerable volume of work which, on occasion, will require more frequent and more flexible arrangements than can be provided through formal Committee procedures. Under these circumstances it is appropriate to put into place temporary specific arrangements to ensure timely and reliable decision making.
- 10.15 The Council is undertaking a review of its governance arrangements and, in the light of this work, it is appropriate to request Full Council to make suitable provision for inclusive joint Council governance arrangements.

Next Steps:

- 10.16 Subject to the approvals recommended above, the Council will next need to determine its approach to the spatial strategy for locating and distributing growth within both districts. This is a matter that requires early consideration and will be reported back to Committee as part of the ongoing decision path.

**11 Appendices**

Title	Location
(a) Babergh and Mid Suffolk Joint Local Plans Programme 2016 - 18	Appendix A

## 12 Background Documents

National Planning Policy Framework.

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# **Babergh & Mid Suffolk Joint Local Plans Programme 2016 –17**

Local Development Scheme (LDS) for new Local Plan Documents

June 2016

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## **1. Purpose of This Document**

- 1.1 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 intend to prepare. This helps those with an interest in such Plans to get involved with their preparation.
- 1.2 Progress against the timescales set out in this Local Development Scheme (LDS) will be set out each year in the two Councils' combined authority monitoring report (produced to cover the period from start of April to end of March).
- 1.3 In addition, 'real-time' information on progress against the LDS will be provided on the Planning pages of the two Councils' websites.
- 1.4 This LDS replaces all previous LDSs / Local Plan programmes previously produced and issued by Babergh and Mid Suffolk Councils.

## **2. Combined Local Plan Proposals**

- 2.1 Babergh and Mid Suffolk Councils have been developing an agreed process of integrating services over several years. Whilst remaining two distinct sovereign councils, they now have a single staff structure to serve the two organizations and members work together very closely. The two Councils have a joint Strategic Plan. A key point of agreement is a shared focus on the planning and delivery of sustainable growth.
- 2.2 Current planning policy documents include the Babergh Core Strategy, 2014 and the mid Suffolk Core Strategy, 2008 and Core Strategy Focused review, 2012. Mid Suffolk also has a Stowmarket Area Action Plan, 2013.
- 2.3 In October 2013 members of both councils agreed formally to produce a single planning policy framework for the future, with a joint Local Plan. In line with this, the councils introduced a joint Community Infrastructure Levy (CIL) in April 2016.
- 2.4 Common monitoring processes are now in place and the two councils produced their first combined Annual Monitoring Report for the year 2013-2014.

## **3. Duty to Co-operate**

- 3.1 The Joint Local Plan is being developed alongside a broader, strategic planning and infrastructure process to serve the whole Suffolk system (the Suffolk Planning and Infrastructure Framework). The two processes are separate, although there will need to be a high degree of coordination between the two.
- 3.2 There is a need to agree planned future growth levels, in line with the National Planning Policy Framework (NPPF) requirements in respect of meeting full, objectively assessed, needs (FOAN) for both employment and

housing growth. Identifying the appropriate FOAN involves a careful assessment of the available technical evidence and ensuring that it is updated on a regular basis.

- 3.3 The work being relied upon for this has been developed in conjunction with partner local planning authorities reflecting the geography for the Ipswich housing market area, functional economic area and travel to work area, all of which are broadly equivalent to the whole of Ipswich and the three neighbouring Districts (i.e. Ipswich Borough, Babergh, Mid Suffolk and Suffolk Coastal Districts).
- 3.4 Consideration is also required as to whether meeting the FOAN would give rise to adverse impacts that would significantly and demonstrably outweigh the benefits (when assessed against the NPPF as whole).

#### **4. Planning and Growth**

- 4.1 The intention is to replace previous saved Local Plan policies (of both Districts) with a more streamlined and focused planning framework. This will build on work to update a comprehensive evidence base and sustainability appraisal scoping. Preliminary work on preparing a new joint Local Plan commenced with the publication of Issues and Options stage consultations in January 2015. These consultations included Core Strategy Focused Review – Objectively Assessed Need & Rural Growth Policy, Development Management Plan Document and a Strategic Site Allocations & Designations Document.
- 4.2 Since that time a number of significant factors, all of which affect the preparation of the Local Plan, have emerged. These include:
- The need to align the term of the Plan in both Districts, to 2036;
  - The likely increase in the employment and housing Full Objectively Assessed Needs (FOAN) for both Districts;
  - The relationship to other Plans, including the need to plan across boundaries with adjacent Planning Authorities and consideration of the emerging Suffolk wide Planning and Infrastructure Framework;
  - The need for further work on the options for distributing growth, including reviewing rural restraint policies (Mid Suffolk)
  - Proposed devolution arrangements for Suffolk and Norfolk.

#### **5. Overall Approach**

- 5.1 The overall approach to the joint Local Plan is to seek 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 and limiting the scope of the new document;
- Alignment of Plan-led approaches across the two 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;
- Reflecting the NPPF emphasis on limiting producing extra DPDs to a minimum and only with additional documents where essential.

## 6. Scope and Timetable

### 6.1 Babergh and Mid Suffolk Joint Local Plan

Scope	The 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 Districts.
Status	Development Plan Document.
Chain of conformity	Must conform with the National Planning Policy Framework and with the adopted Development Plan. The exception to this is where any element of the new Plan supersedes or replaces that of an extant Plan.
Production arrangements	Led by Spatial Policy group, with input from all internal Council service groups and Suffolk County Council as appropriate. The Statement of Community Involvement (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

<b>Timetable</b>	
Member approval (overall approach / member involvement arrangements etc.)	May 2016
Sustainability Appraisal scoping report published for consultation	October 2016
Consideration of responses and amendment of SA scoping report	November – December 2016
Member approval of Issues & Options content and public consultation exercise (Regulation 18)	February 2017
Public consultation	March – April 2017
Consideration of responses and Submission Version Local Plan document preparation	May – June 2017
Approval of Submission Version Local Plan document (Regulation 19)	July 2017
Independent Examination stage (provisional)	September 2017
Adoption (provisional)	December 2017

## **7. Monitoring and Review**

### Monitoring of Local Plan Documents

7.1 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 set out in the Local Development Scheme (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 Supplementary Planning Documents (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.

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

#### Review of Local Plan Documents

7.3 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**

#### Broad Requirements and Purpose

8.1 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.

8.2 A range of assessments - including sustainability appraisal, strategic environmental Assessment, habitats regulations screening / assessments, Strategic Housing Market Assessment (SHMAA) and Strategic Housing Land Availability Assessment (SHLAA) - 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.

8.3 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.

#### Scope

8.4 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.

### Availability

- 8.5 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-developmentframework/>

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

- 8.6 Please note that whilst some elements of the existing evidence base are separate and different (between the two Councils) this will reduce and see increasing alignment in future.

### Principles and Approach

- 8.7 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.

- 8.8 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 two 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.

- 8.9 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.

### Integration with other Strategies

- 8.10 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.

- 8.11 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

- 9.1 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.
- 9.2 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 Service.
- 9.3 As a key project for delivery of the two 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.
- 9.4 Risk Assessment and Management

Issue and Level of Risk	Comment and Proposed Mitigating Measures (Risk Management)
<p>Significant public opposition to plan proposals</p> <p>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 Planning Inspectorate (PINS) to deliver examinations/reports to timetable.</p> <p>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>

Issue and Level of Risk	Comment and Proposed Mitigating Measures (Risk Management)
<p>Loss/turnover of staff.</p> <p>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.</p> <p>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 Length / complexity of the Examination. This will be kept under review.</p>
<p>Changing Political Priorities.</p> <p>Medium Risk (<i>political changes and changing priorities generally a risk, particularly when elections are imminent and can be difficult to manage / mitigate</i>)</p>	<p>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.</p> <p>Low-medium Risk (<i>likelihood, given past track record 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).</p> <p>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 with Other Development Plans

10.1 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 authority. 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.

Type of Plan	Current 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	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

Type of Plan	Current Plan document(s)	Produced by	Purpose	Relationship with District level Local Plan
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