

# West Suffolk Joint Growth Steering Group

Forest Heath &amp; St Edmundsbury councils

**West Suffolk**  
working together

<b>Title:</b>	<b>Agenda</b>																	
<b>Date:</b>	<b>Tuesday 31 October 2017</b>																	
<b>Time:</b>	<b>10.00 am</b>																	
<b>Venue:</b>	<b>Conference Chamber (West)</b> <b>West Suffolk House</b> Western Way Bury St Edmunds																	
<b>Full Members:</b>	<div><div><div><b>Chairman</b> Alaric Pugh</div><div><b>Vice Chairman</b> Lance Stanbury</div></div><table><tr><td></td><td><u>Forest Heath District Council</u></td><td><u>St Edmundsbury Borough Council</u></td></tr><tr><td><u>Conservative Group Members (9)</u></td><td>Chris Barker David Bowman Rona Burt Lance Stanbury</td><td>Alaric Pugh David Roach Peter Stevens Peter Thompson Jim Thorndyke</td></tr><tr><td><u>UKIP Group Member (1)</u></td><td>Reg Silvester</td><td></td></tr><tr><td><u>Haverhill Indys Group Member (1)</u></td><td></td><td>John Burns</td></tr><tr><td><u>West Suffolk Independent Group Member (1)</u></td><td>David Palmer</td><td></td></tr></table></div>				<u>Forest Heath District Council</u>	<u>St Edmundsbury Borough Council</u>	<u>Conservative Group Members (9)</u>	Chris Barker David Bowman Rona Burt Lance Stanbury	Alaric Pugh David Roach Peter Stevens Peter Thompson Jim Thorndyke	<u>UKIP Group Member (1)</u>	Reg Silvester		<u>Haverhill Indys Group Member (1)</u>		John Burns	<u>West Suffolk Independent Group Member (1)</u>	David Palmer	
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<b>Interests – Declaration and Restriction on Participation:</b>	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.																	

<b>Quorum:</b>	Three Members from each Council
<b>Committee administrator:</b>	<b>Sharon Turner</b> Democratic Services Officer (Cabinet) <b>Tel:</b> 01638 719237 <b>Email:</b> <a href="mailto:sharon.turner@westsuffolk.gov.uk">sharon.turner@westsuffolk.gov.uk</a>

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# Public Information

<b>Venue:</b>	<b>Conference Chamber (West) (F1R09)</b> <b>West Suffolk House</b> Western Way Bury St Edmunds Suffolk IP33 3YU	Tel: 01638 719000 Email: <a href="mailto:democratic.services@westsuffolk.gov.uk">democratic.services@westsuffolk.gov.uk</a> Web: <a href="http://www.westsuffolk.gov.uk">www.westsuffolk.gov.uk</a>
<b>Access to agenda and reports before the meeting:</b>	Copies of the agenda and reports are open for public inspection at the following addresses:  District Offices College Heath Road Mildenhall Bury St Edmunds Suffolk IP28 7EY  West Suffolk House Western Way Bury St Edmunds Suffolk IP33 3YU	
<b>Attendance at meetings:</b>	Both Forest Heath and St Edmundsbury Councils actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public.	
<b>Public speaking:</b>	There is no provision for members of the public to ask questions or make statements during the West Suffolk Joint Growth Steering Group meetings.	
<b>Disabled access:</b>	West Suffolk House has facilities for people with mobility impairments including a lift and wheelchair accessible WCs. However, in the event of an emergency, use of the lift is restricted for health and safety reasons.  Visitor parking is at the car park at the front of the building and there are a number of accessible spaces.	
<b>Induction loop:</b>	An Induction loop is available for meetings held in the Conference Chamber.	
<b>Recording of meetings:</b>	The Council may record this meeting and permits members of the public and media to record or broadcast it as well (when the media and public are not lawfully excluded).  Any member of the public who attends a meeting and objects to being filmed should advise the Committee Administrator who will instruct that they are not included in the filming.	

# Agenda

## Procedural Matters

**1. Apologies for Absence**

**2. Substitutes**

**3. Minutes**

**1 - 6**

To confirm the minutes of the meeting held on 9 October 2017  
(copy attached)

## Part 1 - Public

**4. DCLG Consultation: 'Planning for the Right Homes in the Right Places'**

**7 - 20**

Report No: **JGG/JT/17/006**

*To provide Members with an update on the key proposals contained within this consultation paper, which was announced as part of the recent Housing White Paper*

**5. Bury St Edmunds Town Centre Masterplan**

*To receive a presentation on feedback from the MAP (Movement; Activity; Place) consultation in relation to the Bury St Edmunds Town Centre Masterplan*

**6. Work Programme 2017/2018**

*Potential future items for consideration by the Group*

**7. Dates of Future Meetings**

The next meeting of the Steering Group has been set as follows:

Tuesday 20 February 2018\*      10.00 am      District Offices,  
Mildenhall

*(\*Note: Following on from the discussions held at the last meeting regarding the future structure of this Group, this date may be subject to change\*)*

## Part 2 - Confidential

**8. Future Housing Delivery Options**

*To consider other options/examples which have been used for housing delivery by other local authorities*

# West Suffolk Joint Growth Steering Group



**Minutes** of a meeting of the **West Suffolk Joint Growth Steering Group** held on **Monday 9 October 2017** at **1.30 pm** in the **Conference Chamber (East), West Suffolk House**, Western Way, Bury St Edmunds, IP33 3YU

Present: **Councillors**

**Chairman** Alaric Pugh  
**Vice Chairman** Lance Stanbury

Forest Heath District Council

Chris Barker  
David Bowman  
Rona Burt  
David Palmer

St Edmundsbury Borough Council

David Roach  
Peter Stevens  
Peter Thompson  
Jim Thorndyke

**71. Apologies for Absence**

Apologies for absence were received from Councillors John Burns (SEBC) and Reg Silvester (FHDC).

**72. Substitutes**

There were no substitutes present at the meeting.

**73. Minutes**

The minutes from the meeting held on 6 June 2017 were received and confirmed as a correct record and signed by the Chairman.

**74. Growth Priorities - Evidence Base (Presentation)**

The Assistant Director (Growth) gave a presentation to the Steering Group which provided an update on the evidence base to the growth priorities and also set out the proposed elements for the forthcoming West Suffolk Growth and Investment Strategy. The presentation, particularly centred on the following areas:

- The focusing of energies and resources to achieve good growth in West Suffolk
- The Councils' role as an 'Investor'.
- The proposed investment principles.
- The understanding of private sector investment and how to attract this.
- The assessment criteria for investment.
- Development of an Expert Developer/Investor Forum

The Assistant Director also confirmed the approval process for the Strategy and explained that the proposed investment principles would also be considered by both Overview and Scrutiny Committees/Cabinets in November 2017, with the overarching Strategy then being considered by both Cabinets/Councils in December 2017

Whilst discussing this item, Members expressed their support for the development of the proposed framework for growth and investment and also made the following comments/observations:

- Ensuring that there were sufficient internal resources to be able to deliver the principles of the Strategy.
- Ensuring that collaborations with the public/private/third sector were structured to allow for the principles of the Strategy to be delivered.
- Ensuring that internal processes were also in place to allow for the accelerated delivery of appropriate development and growth, where appropriate.
- Ensuring that there were the right kind of commercial buildings available to attract businesses to the area. One of the ways to achieve this, could be the development of a local adaptability fund which could be used for the updating of commercial buildings.

There being no decision required, the Steering Group **noted** the presentation.

*(Councillor Lance Stanbury left the meeting at 2.30 pm, during the discussion of this item)*

## 75. **Future Housing Delivery Options (Presentation)**

*(Councillor Peter Thompson declared a local non-pecuniary interest in this item, being a private landlord in the North West of England)*

Dale Gagen, Corporate Project Officer, Borough Council of King's Lynn and West Norfolk, was in attendance for this item and gave the Steering Group a presentation which explained how the Borough Council was addressing the provision of housing within the Borough, particularly with five sites which had been challenging to develop.

The Steering Group asked questions of the Officer, which centred around:

- The percentage levels which the Borough Council set for the provision of affordable housing and any challenges which they may have experienced around developer viability.
- The development of working arrangements with other partner organisations (ie highways, utilities providers, developers) to allow for this type of scheme to be successfully delivered.

There being no decision required, the Steering Group **noted** the presentation.

**76. Planning Technical Guidance Note: Minimum Space Standards (Verbal)**

The Service Manager (Strategic Housing) informed the Steering Group that, following on from concerns which had previously been raised by Members with regard to the size of new houses being built, an interim Technical Guidance Note had now been produced, which set out the minimum space standards that the West Suffolk Councils' would seek on all new planning applications for the development of new housing, which was also based on the Government's National Space Standards.

The Service Manager clarified to the Steering Group that, at this stage, it should be noted that this was an interim Technical Guidance Note, and could not be classed as a material consideration for planning applications, but regard to the Guidance would be sought. However, it was the intention for this to become a policy within the new West Suffolk Local Plan, once adopted.

This Technical Guidance Note would also be considered by both Cabinets in November 2017. It was agreed for a copy of this interim Guidance Note to also be circulated to the Steering Group for their information.

The Steering Group commended the development of this interim Technical Guidance Note and with there being no decision required, the Steering Group **noted** the verbal update.

**77. Response to Hargrave Neighbourhood Plan: Pre-Submission Version 2017 - 2031 (Report No: JGG/JT/17/004)**

The Planning Officer presented this report which explained that a Neighbourhood Plan was a community-led framework for guiding the future development and growth of an area. Hargrave Parish Council had identified a neighbourhood area that reflected the parish boundary and this had been approved by the Council.

St Edmundsbury Borough Council had a duty to support the Parish Council in the development of their Neighbourhood Plan Council and were required to consider whether the Plan met the requirements of the Localism Act.

There was a legal requirement that the proposed Neighbourhood Plan was publicised before it was submitted to the Local Planning Authority and Hargrave Parish Council were at this Pre-submission (Regulation 14) stage and was available via the following link: <http://hargrave-suffolk.co.uk/>.

The Parish Council had asked St Edmundsbury Borough Council for feedback on their draft Plan by the consultation deadline of 31 October 2017.

Officers had reviewed the Plan (as set out in Appendix A to Report No: JGG/JT/17/004) and, overall, found it broadly in accordance with the strategic policies within the Local Plan and the requirements of the Localism Act and also addressed the standards set out within the Service Level Agreement between St Edmundsbury Borough Council and Hargrave Parish Council.

Paragraph 2. of Report No: JGG/JT/17/004 explained that the Neighbourhood Plan's consultation posed a series of questions and this report had set out

proposed responses for Members' consideration. Members were being recommended to endorse these comments which would then form the basis of a formal response to the Pre-submission version of the Hargrave Neighbourhood Plan, which would then be referred to Cabinet for approval.

In discussing the Neighbourhood Plan, the Steering Group wished to commend the Parish Council on the production of this document. Having then considered the questions and responses as set out in paragraph 2. of Report No: JGG/JT/17/004, the Steering Group also wished to raise the following comments/observations for feeding back to the Parish Council:

- It was acknowledged that the Plan had been produced by the community and was designed to allow for the village to be able to expand gradually/naturally, but it was questioned as to whether some of the aspirational elements of the Plan would actually be deliverable.
- For clarity, it was considered that there could be a separate distinction from the 'aspirational' and 'policy' elements of the Plan. Members suggested that the community actions could be appended as a supplement to the Plan, rather than being embedded amongst the policy text.
- Members discussed whether the Plan was too long, therefore, possibly making it unwieldy. They suggested that perhaps concepts could be explored more graphically rather than through text.
- The Parish Council should be informed that St Edmundsbury Borough Council was due to produce a new Local Plan in the near future. This would be a West Suffolk Local Plan, in conjunction with Forest Heath District Council. West Suffolk would welcome the Parish Council's involvement in the preparation and consultation of that Plan.
- Members recognised the need for a "vibrant countryside", allowing modest growth within the village to enable a sustainable settlement.
- Members suggested that the settlement boundary could be more ambitious, subject to ensuring consistency with the countryside protection and settlement hierarchy strategic policies of the Local Plan and St Edmundsbury Borough Council's Vision 2031, in addition to national planning policies.
- The Parish Council were asked to note that '*dormer*' should be spelt generically, rather than referring to the brand '*dorma*' within paragraph 10.18 of the Plan. The proposals map also contained a typographical error where it read '*Locally*' instead of '*Local Heritage Asset*'.
- Members recognised that the Plan was the result of hard work, the policies were well worded and the Parish Council Working Group should be applauded.



Within Report No: JGG/JT/17/004, the following typographical errors were also reported:

- Paragraph 2.4 - (Hargrave Housing Settlement Boundary. Do you agree with Policy HAR2 (Section 7.5)?)  
In the third sentence, the following words be reversed to read "that accords".
- Paragraph 2.6 (Communications Technology. Do you agree with Policy HAR4 (Section 9.4)?)  
Section 9.4 should be amended to read 'Section 7.14'.

Therefore, the Steering Group **RECOMMENDED**: (to SEBC Cabinet on 17 October 2017)

**That:-**

- 1. The comments contained within Report No: JGG/JT/17/004 be endorsed to form the basis of a formal response to the Pre-submission Version of the Hargrave Neighbourhood Plan 2017-2031, subject to the inclusion of the further comments/typographical errors, as set out in paragraphs 1.8 and 1.9 of Report No: CAB/SE/17/053.**
- 2. To agree that the Hargrave Neighbourhood Plan accords with the strategic policies of the St Edmundsbury Borough Council Local Plan, in addition to meeting the requirements of the Service Level Agreement between Hargrave Parish Council and St Edmundsbury Borough Council.**

#### **78. Work Programme 2017/2018 and Terms of Reference (Verbal)**

The Assistant Director (Growth) presented this item where the Steering Group received proposed draft Terms of Reference for the Group to become a 'Growth and Innovation Group', who would assist the Cabinet with forming strategy and policy on key issues that would influence the growth agenda within West Suffolk. If these draft Terms of Reference were supported by the Steering Group, then these would then be considered by both Cabinets accordingly.

The Steering Group unanimously **supported** these draft Terms of Reference for the establishment of a 'Growth and Innovation Group', for consideration by both Cabinets in due course.

#### **79. Dates of Future Meetings (Verbal)**

It was noted that the dates of future meetings had been previously set as follows:

Tuesday 31 October 2017	10.00 am	West Suffolk House, Bury St Edmunds
Tuesday 20 February 2018	10.00 am	District Offices, Mildenhall

Following on from the above discussions held under Minute No. 78. above on the establishment of a 'Growth and Innovation Group', it was **noted** that the future meeting dates and their format may also need to be reviewed, in line with its proposed Terms of Reference.

The Meeting concluded at 4.15 pm

**Signed by:**

**Chairman**

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# West Suffolk Joint Growth Steering Group



<b>Title of Report:</b>	<b>DCLG Consultation: 'Planning for the Right Homes in the Right Places'</b>	
<b>Report No:</b>	<b>JGG/JT/17/006</b>	
<b>Report to and dates:</b>	<b>West Suffolk Joint Growth Steering Group</b>	31 October 2017
<b>Portfolio holders:</b>	Cllr Alaric Pugh SEBC Portfolio Holder for Planning and Growth <b>Tel:</b> 07930 460899 <b>Email:</b> <a href="mailto:alaric.pugh@stedsbc.gov.uk">alaric.pugh@stedsbc.gov.uk</a>	Cllr Lance Stanbury FHDC Portfolio Holder for Planning and Growth <b>Tel:</b> 07970 947704 <b>Email:</b> <a href="mailto:lance.stanbury@forest-heath.gov.uk">lance.stanbury@forest-heath.gov.uk</a>
	Cllr Sara Mildmay-White SEBC Portfolio Holder for Housing and West Suffolk Lead for Housing Tel: 01359 270580 Email: <a href="mailto:sara.mildmay-white@stedsbc.gov.uk">sara.mildmay-white@stedsbc.gov.uk</a>	
<b>Lead officer:</b>	Simon Phelan Service Manager (Strategic Housing) <b>Tel:</b> 01638 719440 <b>Email:</b> <a href="mailto:simon.phelan@westsuffolk.gov.uk">simon.phelan@westsuffolk.gov.uk</a>	Marie Smith Service Manager (Planning Strategy) <b>Tel:</b> 01638 719260 <b>Email:</b> <a href="mailto:marie.smith@westsuffolk.gov.uk">marie.smith@westsuffolk.gov.uk</a>
<b>Purpose of report:</b>	The purpose of this report is to provide Members with an update on the key proposals contained in the consultation paper 'Planning for the Right Homes in the Right Places', which was announced as part of the recent Housing White Paper.	
<b>Recommendation:</b>	<b>It is <u>RECOMMENDED</u> that Members:</b>  <b>1. Are requested to note and consider the potential implications of the proposals upon West Suffolk and;</b>	

	<b>2. Are invited to make any comments which will be included in West Suffolk's response to the consultation.</b>
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## **1. Key Highlights to consider**

- A consistent methodology provides certainty for the market and is positive in that sense.
- There is a need to draw much stronger correlations between housing need and economic growth.
- The approach is still over focused on numbers and further mechanisms are needed to put more emphasis on the needs of specific groups and specialist provision.
- The effects of policies such as universal credit on need do not feature
- The inter-relationship with Government funding with the methodology is not clear. This is essential if housing delivery is to be more focused on the needs of all people in our local communities
- It is not clear whether the Strategic Housing Market Areas and Strategic Housing Market Assessments will continue. There are mechanism proposed for cross boundary working however we will need to present a strong case that unique positions such as our need to be reflected.

## **2. Background**

- 2.1 The Housing White Paper, which was published and consulted on earlier this year, set out four main areas (stated below) where DCLG plans to take action and consult further:
- planning for the right homes in the right places – to make sure that enough land is released, that the best possible use is made of that land, and that local communities have more control over where development goes and what it looks like;
  - building homes faster – where communities have planned for new homes, ensuring those plans are delivered to the timescales expected;
  - diversifying the market – to address the lack of innovation and competition in the home-building market; and
  - helping people now – tackling the impacts of the housing shortage on ordinary households and communities
- 2.2 The consultation paper 'Planning for the right homes in the right places' is the subject of this report and focuses on making sure that enough land is released, that the best possible use is made of that land, and that local communities have more control over where development goes and what it looks like.

## **3. Content of the consultation and potential implications for West Suffolk**

- 3.1 The consultation is seeking views on the following broad areas:

Main areas of the consultation	West Suffolk's proposed response
<p>DCLG's proposed approach to a <b>standard method for calculating local housing needs</b>, including transitional arrangements</p>	<p>The Government are proposing to introduce a standard approach for calculating local housing need with the aim of making it simpler, quicker and more transparent. They consider that this would speed up the time taken to prepare Local Plans and give local communities greater control.</p> <p>The approach will be based on three principles:</p> <ul style="list-style-type: none"> <li>a) Being simple and transparent</li> <li>b) Being based on publicly available data, national and locally tested data</li> <li>c) Being realistic – reflecting the actual need for homes and taking account of the affordability of homes locally, where high house prices are seen as an indication of an imbalance between supply and demand for new homes, making them less affordable.</li> </ul> <p>The proposed approach will consist of three components:</p> <ul style="list-style-type: none"> <li>1) A demographic baseline</li> <li>2) Modification to take account of market trends (local house prices)</li> <li>3) A cap to limit any increase</li> </ul> <p><b>Government's proposed approach</b></p> <p>In future the baseline for calculating housing numbers will be based on the ONS annual average household growth projections calculated over the life of the Local Plan (assumed to be a maximum of five years). With the Government proposing that this should be calculated using the annual average household growth over a ten year period for each local authority area.</p> <p>Latest household growth projections:</p> <p>FH 2016-26 - 291 average household growth SEBC 2016-26 - 334 average household growth</p> <p>The projected annual household growth would then be adjusted to take into account local market affordability issues. In areas where house prices are high the projected housing numbers would be increased with reference to the ONS median affordability ratios, which compare median house prices to median earnings.</p> <p>Each 1 per cent increase in the ratio of house prices to earnings above four would result in a quarter of a per</p>

cent increase in need above the ONS current projected household growth figure. The threshold of four is used as this is typically the maximum amount that can be borrowed for a mortgage.

Latest affordability ratios for FH 8.17 and SEBC 9.37

Adjustment factor =  $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$

The overall housing need figure would therefore be calculated using the following formula:

Housing Need =  $(1 + \text{adjustment factor}) \times \text{projected housing growth}$

Using the proposed new formula the implications for the Cambridge Housing Sub-Region would be as follows (2016-2026):

Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)	Current local assessment of housing need, based on most recent publically available document (dwellings per annum)
Cambridge	583 (-17%)	700
East Cambridgeshire	598 (-13%-2%)	526 - 586
Fenland	511 (-15%)	600
<b>Forest Heath</b>	<b>367 (+8%)</b>	<b>340</b>
Huntingdonshire	1,010 (+26%)	804
Peterborough	942 (-4%)	981
South Cambridgeshire	1,182 (+13%)	967
<b>St Edmundsbury</b>	<b>446 (-19%)</b>	<b>550</b>

**It should be noted that the above figures are for illustrative purposes only and are intended to be the baseline figures that local authorities will need to plan for and will need to be updated on a regular basis throughout the life of the Local Plan.**

**The new method of calculating housing need does not make any specific adjustment to take account of anticipated employment growth.**

	<p>A cap will be placed on any increase with reference to the status of the local authorities' local plan:</p> <ul style="list-style-type: none"> <li>a) for local authorities that have adopted their local plan in the last five years the new annual housing need figure will be capped at 40% above the current figure</li> <li>b) for those authorities that do not have an up to date plan (i.e. over five years old) the new annual housing need figure will be capped at 40% above whichever is the higher of the projected figures using either the ONS household projections or the figure set out in their current local plan.</li> </ul> <p>It is also proposed to amend the existing local planning guidance to allow local authorities who have ambitions for higher local housing growth to plan for a higher number than those calculated using the new approach where this is based upon a sound local assessment. Planning Inspectors will be advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise.</p> <p>Where an authority proposes housing figures which are lower than the housing need calculated using the new standardised approach these will be rigorously tested by the Planning Inspector at examination stage.</p> <p>Where local authorities are already working together to identify their housing need (as in the case of the Cambridge Housing Sub-Region SHMA) there is the ability to produce a single assessment of housing need for the area as a whole. In this case the housing need for the defined area should be the sum of the local housing need for each local planning authority.</p> <p>Transitional arrangements will be in place depending upon the status of the current or emerging plan:</p> <p>In the case of Forest Heath they will be able to progress with examination using the current method of calculating housing need.</p> <p>For St Edmundsbury as the current Local Plan has been adopted in the last 5 years we can continue to use the current figure. However, when the review of the Plan takes place we will be required to use the new standardised method. Given that Vision 2031 is 3 years old, we have 2 years to adopt the West Suffolk Local Plan using the new standardised approach to ensure we have an up to date Plan across the whole of West Suffolk.</p>
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	<p><b>Issues to consider:</b></p> <p>The proposed new method of calculating housing need would result in a net loss of 77 dwellings per year for West Suffolk over the period 2016-2026, using the current ONS current household projections and median affordability ratios. It must be borne in mind that the ONS figures will be up dated on a regular basis and that the housing need figures will therefore, not remain static over the life of the Local Plan, but will need to be reviewed every two years.</p> <p>The use of the ONS household projections and median affordability ratios are not directly comparable – one is based on households, while the other is calculated at an individual person level.</p> <p>There is a lack of correlation between housing and economic growth. The New Anglia SEP has ambitious targets in this regard. Similarly the Combined Authority is preparing its economic strategy which is likely to be equally ambitious. The modelling being done by Cambridge Ahead based on business growth projections far exceeds any current growth modelling based on ONS statistics.</p> <p>In applying the new calculation of housing need and delivering the additional houses identified for Forest Heath, consideration will need to be given to landscape restrictions, which in the consultation document are identified as being 32% of the land area for Forest Heath compared to 7% for St Eds. However, the proposed formula appears to take no account of the impacts of these landscape restrictions in the ability of a local authority to actually be able to deliver to proposed increased housing numbers.</p> <p>Further work will also need to be undertaken to fully understand the implications of USAFE on both the local affordability ratio and house growth projections.</p> <p>The current housing needs figures for West Suffolk have been calculated with reference to the Cambridgeshire SHMA, which while it uses a robust methodology that has been tested at inspection, is not comparable to that used across the rest of Suffolk. The methodology proposed in the consultation will make the calculation simpler and more transparent and far less open to challenge. The proposal that where authorities are working together to identify housing need could have significant implications for West Suffolk, as the Cambridgeshire authorities that form the Combined Authority could look to exclude those authorities that</p>
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	<p>are not part of that area. This approach would, however, run counter to the existing requirements in NPPF and the proposed requirement for local authorities to produce a Statement of Common Ground.</p> <p>Early discussions will need to take place to ensure that the SHMA continues to be produced on the existing Housing Market area. The continued production of the SHMA will be vital in being able to meet the requirements to disaggregate the overall housing need figure to identify the needs of specific groups (see below).</p> <p>The consultation also sets out the need for a Statement of Common Grounds (see below) between neighbouring authorities, so there may be request from authorities such as South Cambs, Braintree, Babergh and Mid Suffolk to share some of their numbers as they will all see a significant increase in their numbers using the new formula.</p> <p>While the consultation document makes a direct link between high house prices and a lack of supply, with the assumption that increasing numbers will assist with reducing the lack of supply, there is no direct link made between the types of housing (tenure/size) that are required. Increasing the numbers of houses could simply result in developers choosing to build larger more profitable properties, which would have little impact upon the overall affordability of properties.</p>
<p>improving how authorities <b>work together in planning to meet housing and other requirements across boundaries</b>, through the preparation of a statement of Common Ground</p>	<p>The duty to co-operate was introduced in the Localism Act 2011 with the aim of co-ordinating strategic cross-boundary planning matters, compliance with the duty is tested at examination stage. However, recent evidence points to the fact that this duty is not working and the Housing White paper contained a proposal to require planning authorities to produce a statement of common ground, setting out how they intend to work together to meet housing needs and strategic cross-boundary infrastructure that cut across authority boundaries. The proposal is to revise the NPPF to require all local planning authorities to produce a statement of common ground over their housing market area or other agreed geographical area where justified. The statement will need to set out cross-boundary matters, including housing need for the area, distribution and proposals for meeting any shortfalls.</p> <p>Local authorities can also be signatories to more than one statement where there are strategic issues in which they have an interest.</p>

	<p>All local planning authorities will need to have a statement in place within twelve months following the publication of the revised NPPF, regardless of where they are in the plan making cycle, with an expectation that an outline statement will be produced within six months of publication. The statement will also need to be updated on a regular basis to reflect changing priorities.</p> <p>It is also proposed that the test of soundness for a local plan will also be amended so that plans will need to be informed by agreements and effective joint working over wider areas, which are evidenced in the statement of common ground.</p> <p>If there is evidence that statements of common ground are not being produced or working effectively, the Government are proposing a range of interventions such as directing local planning authorities to amend their plans to ensure communities and neighbouring authorities are not being disadvantaged.</p> <p><b>Issues to consider:</b></p> <p>In adopting a new national methodology for calculating housing need is the Government effectively indicating that there is no longer a requirement for Strategic Housing Market Areas? This is unclear in the consultation and would impact considerably upon West Suffolk.</p> <p>West Suffolk will need to work closely with our neighbouring Cambridgeshire authorities to develop a statement of Common Ground, as our housing market is clearly linked to Cambridgeshire rather than Suffolk. At present the elected Mayor for Cambridgeshire does not have responsibility for Strategic Planning, but this may change at a future date. This could potentially have impacts for West Suffolk as the Government are considering introducing additional powers for those areas with elected Mayors, requiring them to also produce a Statement of Common Ground.</p> <p>We will also need to co-operate with the rest of Suffolk on both housing and infrastructure issues, through the development of the Spatial Development Strategy to better link planning and infrastructure funding and the challenges to secure investment and deliver homes across local authority boundaries.</p> <p>As previously indicated there may be opportunities for West Suffolk to co-operate with neighbouring authorities</p>
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	<p>who may be unable or unwilling to accommodate their increased housing numbers.</p> <p>Consideration will also need to be given to the balance between the needs of the wider area need and local needs, to ensure that the needs of the wider strategic area do not distort or overshadow local need.</p>
<p>how the approach to calculating housing need can help authorities <b>plan for the needs of particular groups</b>, including affordable housing and housing for older and disabled people <b>and support neighbourhood planning</b></p>	<p>Recognition that local planning authorities (LPA) don't only have to plan for the right number of houses, but also the different sizes, type, tenure and range of housing for their area. New planning guidance relating to how this is planned for will be published alongside the revised NPPF.</p> <p>Planning authorities will be required to identify the need for a range of tenures including older and disabled people, affordable housing and self-build etc. which have to be disaggregated into the overall need.</p> <p>Neighbourhood plans introduced under the Localism Act 2011 are seen as a powerful tool for local people to guide future development of their area. The housing White Paper proposed to amend national policy so that local planning authorities are expected to provide neighbourhood planning groups with a housing need figure, where this is needed to allow progress to be made with neighbourhood planning.</p> <p>Where the local plan is out-of-date and cannot be relied on as a basis for allocating housing figures, the Government are proposing to set out in guidance a simple formula-based approach which apportions the overall housing need figure for the relevant local authority area/s, based on the latest figures calculated under the new standard approach to the neighbourhood planning area.</p> <p><b>Issues to consider</b></p> <p>There would appear to be a conflicts in the consultation between the requirement to apply the new methodology for calculating the housing needs, the requirement to disaggregate this figure to identify the needs of specific groups and requirement for LPA to provide a housing need figure to feed into neighbourhood plans.</p> <p>There needs to be a clear understanding and link between supply and demand for specialist housing. The new methodology for calculating housing need should not lead to the demise of the SHMAs, which include a far more detailed assessment of need across the different tenures and housing types. Without these documents it</p>

	<p>is unclear how authorities would be able to disaggregate the total housing need across the different client groups.</p> <p>The identification of housing need within neighbourhood plans needs to follow same methodology for identifying local housing need and should be updated every two years in-line with district level figures. It is unclear how local planning authorities will be expected to disaggregate an accurate housing needs figure for designated neighbourhood planning area or parishes.</p> <p>No link or comment is made in the consultation between the need for a LPA to plan for the needs of a particular group and what would happen if the LPA failed to meet the needs of that group, especially if was a protected group under the Public Sector Equality Duty, such as Travellers, would a LA be open to a subsequent challenge?</p>
<p>proposals for <b>improving the use of section 106 agreements</b>, by making the use of viability assessments simpler, quicker and more transparent</p>	<p>The consultation proposes that local planning authorities will need to set out the types and thresholds for affordable housing contributions required, the infrastructure needed to deliver the local plan and the expectations for how these will be funded and the contributions developers will be expected to make. With the plans and policies needing to be tested for viability to ensure they are deliverable.</p> <p>The NPPF will be amended to make clear that where policy requirements have been tested for viability, the issue should not usually need to be tested again at planning application stage. In future it will be assumed that where planning applications can meet the requirements set out in the local plan they are viable.</p> <p>Where viability assessments are still needed the process must become more open, transparent and easily understood. The Government propose to update the planning guidance to help make viability assessments simpler, quicker and more transparent.</p> <p>The national planning policy will also be amended so that local planning authorities will need to set out how they will monitor, report and publicise funding/planning obligations secured through S106 agreements and how the funding is to be spent.</p> <p><b>Issues to consider</b></p> <p>The current Forest Heath and St Eds local plans already set out the types and thresholds for affordable housing contributions required and these have been tested for</p>

	<p>viability. Work on the Suffolk SPIF will help to identify infrastructure requirements.</p> <p>It is a positive step that the Government recognises the on-going issues around viability. The transparency of viability assessments would be greatly improved if the Government were to introduce a simple standardised approach that could be applied nationally. This would avoid situations where developers are able to apply their own methodologies and assumptions that are difficult to challenge.</p> <p>Key parties need to be engaged at the earliest possible stage in planning applications so as not to cause viability issues at a later date.</p> <p>West Suffolk has for the past two years published an annual report on delivery and performance of S106 agreements.</p>
<p>seeking further views on how we can <b>build out homes more quickly</b></p>	<p>Paragraph 2.15 of the housing White Paper set out the Government's intention to increase nationally set planning fees by 20 per cent for those local planning authorities who committed to invest the additional fee income in improving the productivity of their planning departments. All local planning authorities chose to make this commitment and Government are working on the regulations to enable this to happen.</p> <p>The housing White Paper also suggested that an increase of a further 20 per cent on the current fee level could be applied to those authorities who are delivering the homes their communities need. The current consultation seeks views on the most appropriate criteria to enable this to happen.</p> <p>The Government wants to see homes built faster and expects house builders to deliver more homes, more quickly and to a high quality standard. They recognise that after planning permission for new homes is granted, there are a variety of factors that can prevent development from starting or slow down delivery. Rather than focussing on a single issue, the housing White Paper acknowledged that all parties in the development process need to play their part in speeding up the delivery of new homes. The housing White Paper set out a number of wide-ranging approaches, such as diversifying the housebuilding market – supporting new entrants and encouraging modern methods of construction and addressing skills shortages by growing the construction workforce the current consultation seeks views on any other actions that could increase build out rates?</p>

	<p><b>Issues to consider</b></p> <p>Should the further proposed increase in Planning fees be restricted to larger strategic sites say above 50 units so as to avoid any potential impact on viability of smaller sites?</p> <p>Should there be a link between pre-application advice and the ability to charge increased planning fees?</p> <p>The West Suffolk Housing Delivery Plan will specifically seek to identify mechanisms and options for speeding up build out rates for new housing.</p>
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3.2 The full consultation document can be found here:  
<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>.

3.3 Subject to the outcome of this consultation, and the responses received in the Housing White Paper, the Government intends to publish a draft revised National Planning Policy Framework early in 2018.

#### **4. The wider context**

4.1 A Suffolk-wide response and a Cambridge Sub-region response are being prepared. As soon as the detail around those responses is available they will be circulated to Cabinet Members and Leadership Team.

#### **5. West Suffolk's response – Timetable**

5.1 The content of this report is being considered by West Suffolk Joint Growth Steering Group on the 31 October 2017, with any feedback or changes from Leadership Team being reported verbally.

5.2 The Portfolio Holders for Planning and Growth and for Housing will then sign-off the final response in early November 2017.

5.3 The deadline for responses is **Thursday 9 November 2017**. If you have any comments please send them through to either Simon Phelan, Service Manager (Strategic Housing) at [simon.phelan@westsuffolk.gov.uk](mailto:simon.phelan@westsuffolk.gov.uk) or Marie Smith, Service Manager (Planning Strategy) at [marie.smith@westsuffolk.gov.uk](mailto:marie.smith@westsuffolk.gov.uk) by Wednesday 1 November 2017.

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