

## **CABINET**

<b>DATE</b>	10/06/2020
<b>REPORT OF</b>	Councillor Stewart Swinburn, Portfolio Holder for Environment and Transport
<b>RESPONSIBLE OFFICER</b>	Clive Tritton, Interim Director of Economy and Growth
<b>SUBJECT</b>	Local Plan Review
<b>STATUS</b>	Open
<b>FORWARD PLAN REF NO.</b>	CB 06/20/01
<b>CONTRIBUTION TO OUR AIMS</b>	

The current Local Plan was adopted in March 2018. The Plan supports the Council's priorities of 'Stronger Economy and Stronger Communities'.

### **EXECUTIVE SUMMARY**

This report provides information on a number of planning policy changes, which provide the background to a recommendation to approve the commencement of the review of the North East Lincolnshire Local plan in accordance with the requirements of the National Planning Policy Framework (NPPF) 2019, and publication of a revised Local Development Scheme.

### **RECOMMENDATIONS**

It is recommended that Cabinet delegates authority to the Director of Economy and Growth, in consultation with the Portfolio Holder for Environment and Transport to;

- Approve the commencement of the review of the North East Lincolnshire Local Plan.
- Agree to the principles that will guide the review of the Local Plan, and
- Approve and commence consultation to determine the full scope of the review.

### **REASONS FOR DECISION**

In July 2018 the National Planning Policy Framework (NPPF) was updated. This introduced the most significant change in national planning policy since the NPPF was first published in 2012, further changes were introduced in 2019.

The most significant change is the requirement that local plans be reviewed to consider whether they need to be updated within five years of being adopted. The North East Lincolnshire Local Plan was adopted in March 2018, a review must therefore be undertaken and be complete by March 2023.

It is considered prudent to commence the review now to address changes introduced in the NPPF and maintain a robust local plan, as detailed in this

report.

## **1. BACKGROUND AND ISSUES**

- 1.1 The current Local Plan was adopted in March 2018 in accordance with legislation and conformity with the National Planning Policy Framework 2012, some key elements of the Plan include:
- A pro-growth strategy
  - A total housing requirement over the plan period 2013-32 of 9,742 homes
  - A housing land supply capable of providing 16,122 extending beyond the plan period
  - Provision of employment land capable of supporting 8,800 new jobs.
- 1.2 The policies supporting these elements have been in operation successfully across the Borough since the Plan was adopted. A significant number of housing allocations have been brought forward for development, either progressing towards planning consent, securing planning consent, or commencing delivery on site.

Changes to National Planning Policy:

- 1.3 In July 2018 the Government introduced significant changes to national planning policy which have some significant implications. In summary, these are:
- Local plans must be reviewed to consider whether they need to be updated within five years of being adopted;
  - A new standard methodology for calculating local housing need has been introduced which will act as a minimum for setting housing requirement figures in local plans;
  - A requirement to establish the different housing needs, including but not limited to, affordable housing, family housing, older persons accommodation, students, people with disabilities and people wishing to rent their homes;
  - An obligation to set out housing requirements for designated neighbourhoods pursuing neighbourhood plans;
  - A new Housing Delivery Test has been introduced which makes local planning authorities responsible for housing delivery, failure to pass the test can impact on the effectiveness of local plan policies;
  - A requirement for local plans to include 10% of the housing requirement as sites of one hectare or less;
  - An allowance for 'entry level exception sites' to be delivered on the edge of existing settlements on sites up to one hectare or less than 5% of the size of the existing settlement; and
  - An advanced requirement to include the infrastructure needs for the Borough and a more robust viability assessment.
- 1.4 The adopted North East Lincolnshire Plan does not include a number of these elements and as such is potentially less robust in decision making and

defending decisions at appeal.

- 1.5 The most significant changes relate to the calculation of local housing need and the setting of the housing requirement. The latest published housing need figures for North East Lincolnshire using the standard methodology, stands at 238 dwellings per year (this figure may be subject to change as the methodology is being reviewed) – this figure is substantially below the adopted annual housing requirement figure in the adopted local plan (512), and importantly significantly below historic net completion rates in the Borough (346, 2013-16). Whilst the 238 dwellings per year figure establishes the minimum housing need it does not set the housing requirement, it is recognised that there may be circumstances that warrant an adjustment to these figures when establishing the housing requirement including growth strategies.

#### Planning Advisory Service Toolkit

- 1.6 The Planning Advisory Service have produced a toolkit to assist local planning authorities in undertaking their reviews, this takes the form of a series of matrices which provides a check to determine which policies may be out of date for decision making, or where circumstances have changed. The toolkit provides an effective mechanism to determine what policies should be, or would benefit from review.
- 1.7 The toolkit comes in four parts. Parts 1 and 2 relate to the local plan review and content requirements as defined in the NPPF. Parts 3 and 4 relate to the process requirements for plan preparation and soundness and quality issues. At this stage of the review process Parts 1 and 2 have been completed, these have been set out in appendices A and B to this report.

## **2. RISKS AND OPPORTUNITIES**

### Justification for a Local Plan Review

- 2.1 It should be recognised that the Local Plan has been successfully operating since its adoption in March 2018 and that the need for review at this time is triggered by the changes to national planning policy that could mean a loss of control over which sites are brought forward for development.
- 2.2 Net housing delivery has been above the figure set by the housing delivery test but below the local plan requirement, this means that the Council currently passes the housing delivery test but has seen a reduction in the Five Year Housing Land Supply Assessment, (2018 7.2 years, 2019 6.7 years).
- 2.3 A further change set out in an update to National Planning Guidance (PPG) has introduced a greater scrutiny on the evidence for why a site identified in the five year supply is deliverable within the five year period. There is therefore a danger that in future years the housing supply assessment which is based on the Local Plan Requirement, will not be able to demonstrate a five year supply. This would trigger a presumption in favour of sustainable development (NPPF paragraph 11d) and effectively result in a loss of control, presenting an open

door to speculative applications.

- 2.4 The introduction of the standard methodology as the basis for establishing the minimum housing need provides the opportunity to adjust the housing requirement to mitigate the risk. This can only be done through a local plan review. This does not mean that the growth ambitions of the Borough should be abandoned, to the contrary the legislation allows for the housing requirement to potentially be defined as a range which would accommodate growth supported by the evidence set out in growth strategies.
- 2.5 Much of the Local Plan does not need revision as it is operating effectively and the evidence which supports the majority of the policies is robust and up to date. This should streamline the review process. A review now would however, provide the opportunity to address the changes introduced in the revised NPPF quickly acknowledging the need to update specific pieces of evidence where necessary.
- 2.6 If a local plan review is to be commenced it is recommended that a number of principles are established to ensure the review of the Plan is efficient, delivered in a timely manner and successful at examination. The suggested principles are as followed:
  - Maintain a single all-encompassing local plan;
  - Maintain a pro-growth strategy which supports the council's economic strategy;
  - Produce a plan which is viable and deliverable;
  - Make revisions to the Plan only where necessary to address the changes to the NPPF or where the need is highlighted in the PAS toolkit.

#### Risks of Reviewing the Plan now

- 2.7 Whilst there are a number of benefits in reviewing the Local Plan now it is important to note there are also some potential risks and costs.
- 2.8 The first is the risk of negative public perception. A local plan review commencing so soon after adoption of the original plan is likely to be questioned. This may raise doubt about the council's growth ambitions.
- 2.9 The second risk is ensuring the scope of the review is controlled. There is a risk that the scope of the review is expanded beyond what is necessary to address the changes in the NPPF. Failure to control these aspects would result in an extended timescale for completing the review, increase costs and widen the scope of the examination unnecessarily, and potentially increase the public's negative perception.
- 2.10 Given the position with the housing land supply assessment which has been highlighted, the risks of not acting to commence a selective policy review now, and failing to control the review process, could mean that speculative planning applications will be lodged that may ultimately lead to unplanned growth.

- 2.11 Finally, the review will consider the effects of the COVID-19 pandemic (and implications) on housing development in the short, medium and long term.

#### The Local Development Scheme

- 2.12 The preparation of the Local Plan Review will require a new Local Development Scheme (LDS). The LDS is the document which sets out the timetable for key milestones in the production of the Local Plan. It is a legal requirement to have an up to date LDS which is publically available. The LDS should set out what is considered to be a realistic but challenging timescale for the Local Plan Review.
- 2.13 It is considered appropriate to consult on the scope of the local plan review before establishing and setting out the timeframe in the LDS. The LDS will therefore be presented to Cabinet for approval at a later date.
- 2.14 The LDS will need to include a number of key steps. At Regulation 18 stage, this would be defined as an initial stage of consultation to establish the final scope of the review, the evidence to be prepared and undertake a call for sites. This would be followed by consultation on a draft plan to allow for comment to be received prior to preparation of the final document. The Regulation 19 stage marks the pre-submission publication stage, which includes a formal 6 week consultation period after which the Plan would be submitted to the Secretary of State for independent examination under in accordance with Regulation 22.

### **3. OTHER OPTIONS CONSIDERED**

There is an option to delay commencing the review of the Plan, as the legal requirement is to have completed a review by March 2023, but this introduces substantial risk in relation to maintaining a five year housing land supply and the associated risk of losing control of where housing growth occurs.

### **4. REPUTATION AND COMMUNICATIONS CONSIDERATIONS**

There are potential positive/negative reputational implications for the Council resulting from the decision. An action plan has been/will be agreed with the Council's communication service, covering the following issues e.g. any statutory communications requirements, consultation requirements, and information requirements. Communication channels to be utilised.

### **5. FINANCIAL CONSIDERATIONS**

The costs of preparing the review documents and engagement through the process will be met by ENGIE. There will be a requirement to update some evidence documents, the need for which will be defined by the scope of the review; the costs for updating these documents will be split between the Council and ENGIE, as outlined in the contract. The cost of the inspector at the local plan examination will need to be met by the council. All costs will be verified by NELC.

## **6. CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS**

The local plan includes many policies that have climate change and environmental implications. The Government has strengthened the approach to climate change in the NPPF and is introducing new legislation affecting the environment. The review will need to address these changes.

## **7. CONSULTATION WITH SCRUTINY**

Proposed changes identified in the review will be considered for Scrutiny in due course.

## **8. FINANCIAL IMPLICATIONS**

The cost to the Council of the inspection, when it takes place, is estimated to be in the region of £100k and resources will need to be identified to cover this cost.

## **9. LEGAL IMPLICATIONS**

As can be seen from the above report, to ensure compliance with the National Planning Policy Framework and supporting regulations, a review to ensure robustness of the planning process is prudent.

A consultation to explore the extent of the review appears to be a proportionate and reasonable step to take and can be supported by appropriate officers.

## **10. HUMAN RESOURCES IMPLICATIONS**

There are no direct HR implications

## **11. WARD IMPLICATIONS**

All wards are affected

## **12. BACKGROUND PAPERS**

North East Lincolnshire Local Plan 2013 to 2032 (2018)  
(<https://www.nelincs.gov.uk/planning-and-development/planning-policy/the-local-plan/the-new-local-plan/north-east-lincolnshire-local-plan-2013-2032-adopted-2018/>).

### **13. CONTACT OFFICER(S)**

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**Councillor Stewart Swinburn**  
**Portfolio Holder for Environment and Transport**

## Appendix A

### PAS LOCAL PLAN ROUTE MAPPER TOOLKIT **PART 1: LOCAL PLAN REVIEW ASSESSMENT**

#### Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

#### How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date NPPF. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#). Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.



To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

## How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	<b>PLAN REVIEW FACTORS</b>		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p><b>PROMPT:</b></p> <p>As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree, (with specific exceptions )	<p><b>Reason (with reference to plan policies, sections and relevant evidence):</b></p> <p>The local plan policies are consistent with the NPPF, however the housing requirement is significantly higher than the standard methodology, and is currently not being met. This puts pressure on the housing land supply.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p><b>PROMPT:</b></p> <p>Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The housing need figure derived from the standard methodology is significantly below the requirement set out in the adopted local plan. It is below the actual number of homes delivered looking back over past years. The stepped housing requirement set out in the local plan has however, never been met which would suggest that the requirement figures have been too ambitious. The review will need to consider whether there is a lag in the expectations of growth or whether the future expectations of growth generated by SHIP, Town Deal etc should be adjusted.</p> <p>It is considered that a requirement defining a range of values would provide the best fit for the Borough. This would provide the flexibility to ensure housing requirements are met, future growth can be accommodated whilst ensuring that undue pressure is not put upon the 5 year housing land supply.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.		
A3.	<p><b>You have a 5-year supply of housing land</b></p> <p><b>PROMPT:</b></p> <p>Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	<p>Agree</p> <p>Cautionary note</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council can currently demonstrate that it has a 5 year housing land supply however, this has reduced year on year since the local plan was adopted. Given the under delivery against the local plan requirement the shortfall accrued to be taken into account in the assessment has been increasing.</p>
A4.	<p><b>You are meeting housing delivery targets</b></p> <p><b>PROMPT:</b></p> <p>Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Disagree	<p>Failure to meet housing delivery targets (compounded by major demolitions) has significant implications for the housing delivery test and 5 year housing land supply assessment.</p> <p>This is not a consequence of land supply, the local plan identifies a supply considerably in excess of the overall housing requirement, and the vast major of sites have seen progress in bringing them forward for development,</p> <p>A number of key strategic sites and sites in the council's ownership have taken longer than anticipated to start to deliver</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A5.	<p><b>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.</b></p> <p><b>PROMPT:</b></p> <p>Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>Progress has been made on delivering employment sites and creating job opportunities, affordable housing delivery is low compared to the level of need but the policy approach is based on viability and offers flexibility to deliver affordable housing in a number of ways both on and off site.</p>
A6.	<p><b>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</b></p> <p><b>PROMPT:</b></p> <p>A key employer has shut down or relocated out of the area.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The drive towards a low carbon economy presents opportunities and challenges. The Humber estuary is a recognised energy cluster and the sector skills are readily transferable to low carbon energy eg renewables, hydrogen, solar etc. AS with the growth of the renewables sector, it is difficult to predict the scale of the opportunities presented by developing a low carbon economy. The plan must therefore accommodate the flexibility to address what might be significant change.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A7.</b>	<p><b>There have been no significant changes affecting viability of planned development.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>With the exception of the large strategic sites which present challenges in terms of the scale of infrastructure improvements required, there has not been evidence that the viability of development has worsened since the local plan was adopted.</p> <p>It should be noted however, that the govt approach to education contributions has widened and the expectation that developments should meet all education needs including SEN.</p>
<b>A8.</b>	<p><b>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</b></p> <p><b>PROMPT:</b></p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type.</p>	Agree cautionary note	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Grimsby West and Humberston Road strategic housing sites have not yet delivered any homes. In addition the council assets sites that are being brought forward for housing have been delayed due to the requirement to provide replacement playing pitches</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A9.	<p><b>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>An updated SFRA has been produced jointly with North Lincolnshire Council. This has not identified any significant changes for the Borough.</p> <p>No significant revisions have arisen regarding Air quality Management areas, European habitat sites or heritage assets.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A10.	<p><b>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</b></p> <p><b>PROMPT:</b></p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>No new sites have become available which were not anticipated or which impact on the spatial strategy. The redevelopment options for the Former Freeman Street tower blocks can be addressed under the existing policy framework.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p><b>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>A number of key infrastructure projects have been delivered and others are planned. The Toll Bar roundabout project has been revised which resulted in significant delay which affected delivery of Housing site HOU105.</p>



	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A12.	<p><b>All policies in the plan are achievable and effective including for the purpose of decision-making.</b></p> <p><b>PROMPT:</b></p> <p>Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>There is no evidence of appeal decisions pointing to policies being ineffective or in need of review. Checks with planning colleagues have indicated only minor queries regarding clarification of wording in a number of specific cases eg Policy 23</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p><b>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>● Review any relevant neighbourhood plans</li> <li>● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities.</li> <li>● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</li> </ul>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>There are no neighbourhood plans being progressed in the Borough, and no indication of forthcoming requests from a duty to cooperate perspective.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p><b>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review any manifesto commitments and review the corporate and business plan.</li> <li>● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on.</li> </ul>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The council has seen a change in political direction, however there is no indication that this would require a change in the approach set out in the current plan.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You <b>AGREE</b> with <u>all</u> of the statements above		<p>If <b>no</b> go to question A16.</p> <p>If <b>yes</b>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You <b>DISAGREE</b> with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><b>Decision:</b> Update plan policies ✓</p> <p><b>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</b> The current local plan housing requirement is set significantly higher than that derived from the standard methodology and is not being achieved in terms of housing delivery even though a healthy housing land supply is available. There is a</p>		

	danger than the under delivery will eventually impact on the housing land supply and trigger a presumption in favour of sustainable development.		
	<b>Other actions that may be required in addition to or in place of an update of plan policies</b>		
	<b>B. POLICY UPDATE FACTORS</b>	<b>YES/NO (please indicate below)</b>	<b>Provide details explaining your answer in the context of your plan / local authority area</b>
<b>B1</b>	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	yes	The housing requirement is significantly above that derived from the standard methodology and above past records of housing delivery
<b>B2</b>	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	no	
<b>B3</b>	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	yes	Adjustment to the housing requirement will have a knock on effect on a number of policies, where the requirement figures are referred to. There is also an opportunity to update a number of development management policies.
	<b>You have answered yes to one or more questions above.</b>		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	<b>You have said no to <u>all</u> questions (B1 to B3) above</b>		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.

<b>B4</b>	<p><b>Decision: Partial Update of Plan Policies</b></p> <p><b>Reasons for scope of review:</b> The update to the housing requirement can be achieved including an extension to the plan period, it is considered that this can be achieved whilst maintaining the existing housing allocations, the majority of which now have planning permission in place.</p> <p><b>The potential full scope of the review is detailed below:</b></p> <p>Policy 1 Employment Land supply – extension of plan period to 2037</p> <p>Policy 2 The housing Requirement – extension of plan period, remove stepped approach, identify requirement as a range (standard methodology baseline to 450?)</p> <p style="padding-left: 40px;">Updated housing requirement/future housing supply image</p> <p style="padding-left: 40px;">Updated Calculation of 5 year housing Land supply</p> <p>Vision – extension of plan period</p> <p>Objectives – factual update critical success indicators</p> <p>Policy 7 Employment allocations – factual update available supply</p> <p>Housing sites under construction factual update/supply in plan period/total capacity</p> <p>Policy 13 Housing allocations extension of plan period /estimated yield</p> <p style="padding-left: 40px;">Factual update housing trajectory</p> <p style="padding-left: 40px;">Factual update capacity strategic housing sites table</p> <p>Policy 14 Development of strategic housing sites – factual update site capacity</p>
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Policy 15 Housing Mix – Expand to specify Mix (NPPF requirement)(SHMA)

Policy 18 Affordable Housing - Justification for variation from NPPF definition (SHMA)

Policy 21 Provision for Gypsies and Travellers (update to requirement) (G&T Assessment)

Policy 22 Retail hierarchy and town centre development – minor clarification to text  
 Town centre requirements (retail study update)

Policy 24 opportunity sites update  
 (Freeman street if options clarified)

Policy 28 Local centres – factual update to defined local centres (local centres update)

Policy 30 GTFC community stadium – (update only if location confirmed)

Policy 31 Renewable and low carbon infrastructure – update target/NPPF climate change

Policy 37 Safeguarding transport infrastructure – factual update

Policy 41 Biodiversity – (environment Bill requirement for net gain)

Policy 43 Green space and recreation – potential revision to local standards (Playing Pitch strategy /green space strategy)

*Option to update minerals and waste to identify updated aggregates requirement, waste management requirements identified facilities*

Update (viability assessment)

Appendix A Monitoring Framework – updated to align with council outcome report

	Appendix B Evidence Base – factual update
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<b>Date of assessment:</b>	6 Jan 2020
<b>Assessed by:</b>	I King
<b>Checked by:</b>	D Wheeler
<b>Comments:</b>	



## Appendix B

### PAS LOCAL PLAN ROUTE MAPPER TOOLKIT **PART 2**: LOCAL PLAN FORM & CONTENT CHECKLIST

#### Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

#### How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

**Local Plan Review:** The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:

- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
- Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

**Key:**

New plan-making requirement of the NPPF 2019 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

**Scoping your policies update:** The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

**Assessing your draft policies update:** The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

## How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	Plan is currently compliant, subject to release of new statements
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	Plan is compliant
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	Plan is compliant
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	Plan is compliant
5.	Plans should be:  Aspirational and deliverable  Contain clear and unambiguous policies	NPPF Para 16	Plan is compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
	Accessible through the use of digital tools Serve a clear purpose avoiding duplication		
6.	<i>Plan Content</i>		
7.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	Plan is compliant, but strategic policies need to be specifically defined as such
8.	Outline which policies are 'strategic' policies	NPPF Para 21	This could be made clearer through altering the document layout
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	Review should look to extend the plan period to 2037
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	Policy is compliant
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	Policy is compliant, trajectory may require revision
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	Policy is compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	Policy is compliant However note changes to education contributions set out by govt will require amendment to policy and update to viability assessment
<i>Housing</i>			
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	Policy has not been informed by standard method, update to strategic housing market assessment (SHMA) required
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	Policy does not specify size type or tenure required, evidence required, evidence required from SHMA
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	Updated evidence required to update requirements (SHMA)
17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	Policy not compliant, however a home ownership model would not address local affordable need, this needs to be demonstrated by evidence in the updated SHMA
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	Policy compliant, no neighbourhood areas have been designated

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	Policy compliant, trajectory will need updating
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	Plan has not assessed requirement for small sites but includes a windfall allowance from small sites
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	Policy compliant
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	Policy compliant, but will need updating to address changes in delivery expectations, overall requirement and buffer to be applied
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Policy compliant
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	Policy compliant
<i>Economy</i>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	Policy compliant
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	Policy compliant
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	Policy compliant
29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	Policy compliant
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	Policy compliant
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	Policy compliant
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	Policy compliant
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	Policy compliant
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	Policy compliant
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	Policy not compliant, will require adjustment to policy



	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
37.	<i>Town centres</i>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	Policy compliant
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	Policy compliant
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	Policy compliant
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	Policy compliant, may be appropriate to specify specific uses linked to Town Deal
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	Policy compliant
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	Policy compliant
44.	<i>Healthy and safe communities</i>		

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
45.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	Policy compliant
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	Policy compliant
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	Policy compliant
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	Policy compliant
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	Policy compliant
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	Policy compliant
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	Policy compliant
53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	Policy compliant, potential amendment to local standards
54.	Protect and enhance public rights of way and access.	NPPF Para 98	Policy compliant
55.	<i>Transport</i>		
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	Policy compliant
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	Policy compliant
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	Policy compliant
60.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	Policy compliant
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	Policy compliant
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	Policy compliant (updated need assessment?)

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
63.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	Policy compliant
64.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 109	Policy compliant
65.	<i>Communications</i>		
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
67.	<i>Making effective use of land</i>		
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	Policy compliant
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	Policy compliant
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	Policy compliant, but does not specifically refer to net gain, opportunity to strengthen approach
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	Not addressed specifically, can be addressed in revision to policy

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	Policy compliant
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	Policy compliant
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	Not addressed specifically
75.	Reflect changes in the demand for land.	NPPF Para 120	Not specifically addressed but has been accommodated under existing policy
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	Policy compliant
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	Policy compliant

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
78.	<i>Design</i>		
79.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	Policy compliant, but can be strengthened
80.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	Policy compliant



81.	<i>Green Belt</i>		
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135	N/A
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136	N/A

84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 137 & 138	Policy compliant
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.	NPPF Para 139	N/A

86.	<i>Climate change, flooding and coastal change</i>		
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	Policy compliant
88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	Policy compliant
89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	Policy compliant – opportunity to strengthen policy approach
90.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	Policy compliant
91.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	Policy compliant

92.	<i>Natural environment</i>		
93.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	Policy compliant
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	Policy compliant
95.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	Policy compliant
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	Policy compliant – opportunity to expand opportunities for net gain

97.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	Policy compliant
98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	Policy compliant
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	Policy compliant
100.	<i>Historic Environment</i>		
101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	Policy compliant
102.	<i>Minerals</i>		
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	Policy compliant

104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	Policy compliant
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	Policy compliant
106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	Policy compliant
107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	Policy compliant
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	Policy compliant
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	Policy compliant
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	Policy compliant