

# Guildford Borough Council

Report to: Council

Date: 21 February 2024

Ward(s) affected: All

Report of Director: Place

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Report Status: Open

## Review of the Guildford Borough Local Plan: Strategy and Sites (2015-2034)

### 1. Executive Summary

- 1.1 The Council is required to review the Local Plan: Strategy and Sites (LPSS) within five years of adoption to decide if an update to the Plan is required. Having considered changes in national planning policy, associated guidance and relevant legislation, as well as changes in circumstances affecting Guildford borough since the LPSS was adopted, it is officers' view that the Local Plan should be updated.
- 1.2 Changes identified and which support a decision to update the LPSS include the level of local housing need based on Government's standard method calculation, which differs significantly from the LPSS housing requirement; changes in the economy; slower progress toward delivery of several strategic sites than that anticipated; and changes in planned delivery of supporting infrastructure such as the Guildford A3 scheme.

- 1.3 Furthermore, whilst many of the LPSS policies remain consistent with the National Planning Policy Framework (NPPF), there are changes in planning related legislation and guidance identified which support a decision to update the LPSS. More fundamentally, however, Government proposes to introduce significant planning reform flowing, at least in part, from the recent publication of the Levelling Up and Regeneration Act 2023 (LURA). These changes, which include a new NPPF and National Development Management Policies and other regulations, will impact on plan-making to the extent that 'new style' Local Plans are proposed.
- 1.4 Should the decision to update the Local Plan be supported, a further report will be prepared to propose appropriate timing for and budgetary requirements of the Local Plan update. Importantly, this would consider planning reform proposals including Government's timescales for initiating 'new style' Local Plans alongside the impacts of changes on the nature and form of plans and supporting evidence.
- 1.5 It is important to stress that the findings of this review do not change any elements of the LPSS. The LPSS remains part of the Council's Development Plan, which is the primary consideration in terms of determining planning applications. Due weight will be given to policies according to their degree of consistency with the NPPF, which for the most part they are.
- 1.6 This matter was considered by the Joint Executive Advisory Board at its meeting held on 4 December 2023, and its comments are set out in section 15 below. This report was also considered by the Executive at its meeting held on 25 January 2024. The Executive has endorsed the recommendation to the Council set out below.

## **2. Recommendation to Council**

- 2.1. That the Guildford Borough Local Plan: Strategy and Sites (2015-2034) be updated following the findings of the review undertaken in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 2.2. That a further report be submitted to the Executive at a later date to clarify the appropriate timing for and budgetary requirements of the Local Plan update, such report to follow the enactment of the national planning reform legislation and to consider its implications for the update process.

### **3. Reasons for Recommendation:**

- 3.1. There is a statutory requirement to review the LPSS within 5 years of its adoption. This is to assess whether it needs updating. The review findings set out in this report indicate that an update of the LPSS would be an appropriate course of action to ensure that the Council's Local Plan remains effective into the future.
- 3.2. There are a range of uncertainties which impact on the context for the preparation of a new / updated Local Plan, some of which relate to the lack of clarity regarding the detail of proposed Government reforms to the planning system which guide plan-making. It is necessary that these are fully considered in order to set out recommendations regarding the scope and timing of a new plan-making process.

### **4. Exemption from publication**

No part of this report is exempt from publication.

### **5. Purpose of Report**

- 5.1. This report presents the findings of the review of the LPSS and seeks Council approval for officers to proceed with preparations to inform the update of the Local Plan. Detail on the proposed timing and budgetary implications of a Local Plan update will be presented for agreement at a later date.

### **6. Strategic Priorities**

- 6.1. An up to date Local Plan directly and indirectly contributes to achieving a range of the Council's strategic priorities across the housing and jobs, environment and community themes. This report

recommends updating the Local Plan. An update provides the opportunity for policies to enable or continue to enable delivery of priorities such as reviving the Guildford town centre to unlock its full potential; providing and facilitating housing that people can afford; supporting high quality development of strategic sites; making travel more sustainable and reducing congestion; protecting and enhancing our natural environment; and tackling inequality.

## **7. Review of the LPSS**

### a) Background

- 7.1. The LPSS was adopted by the Council on 25 April 2019. It is a statutory requirement<sup>1</sup> that a review of the LPSS is completed (every) five years from the date of adoption. This report meets that requirement by completing the review of the LPSS now, well ahead of the 25 April 2024 deadline.
- 7.2. To be effective and deliver the right outcomes, Local Plans need to be kept up to date. A review is the key means of assessing whether plan policies remain up to date. For Guildford borough, this review considers whether the LPSS policies need updating in accordance with paragraph 33 of the NPPF. The recently adopted Local Plan Development Management Policies (LPDMP) is not within the scope of this review, although any future update process may consider these policies at a later date.
- 7.3. Regarding the scope of the review, the NPPF indicates that the review *'...should take into account changing circumstances affecting the area, or any relevant changes in national policy<sup>2</sup>.'*
- 7.4. The National Planning Practice Guidance (NPPG) supplements this by listing what authorities can consider when determining whether a plan or policies within a plan should be updated (these are included at Appendix 1).

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<sup>1</sup> In terms of regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

<sup>2</sup> See NPPF, 2023 at paragraph 33

- 7.5. Furthermore, the NPPG<sup>3</sup> sets the expectation that authorities have due regard to the legal Duty to Cooperate (DtC) when undertaking a review to assess if Local Plan policies need updating.
- 7.6. In this context, and to assist in meeting the expectations of the Local Plan review set out in national policy and guidance, this review includes Officers' completion of:
- a schedule reviewing LPSS policies for consistency against the current NPPF and highlighting other material changes in circumstance e.g., new legislation, policy, guidance or evidence. (see 'the NPPF schedule' – included at Appendix 2).
  - the Planning Advisory Service, Part 1 Local Plan Review Assessment matrix which seeks to highlight any changing circumstances impacting the borough (see 'the PAS matrix' – included at Appendix 3)
  - a summary of DtC responses received following their consultation on the LPSS review process (see 'DtC responses summary' – included at Appendix 4)
- 7.7. As part of the review, officers also consider it necessary to reflect upon the national legislative changes already in place flowing from the recent publication of the Levelling up and Regeneration Act 2023 (LURA) or that are envisaged as part of Government's intended reforms to the national plan-making system. These are highlighted in the section below.

b) Findings of the LPSS review

- 7.8. Officers consider that the LPSS should be updated based on a combination of factors considered by this review. These include the changed, and changing, national policy context informing plan-making; indications of changing circumstances affecting Guildford borough; and the opportunity that a Plan update will provide to

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<sup>3</sup> See NPPG: Plan-making at Paragraph: 068 Reference ID: 61-068-20190723

address new and emerging priorities for the Council. These are set out in further detail as follows.

### *Changes in National Planning Policy and associated Legislation and Guidance*

- 7.9. The LPSS was examined against the NPPF 2012, under transitional arrangements at the time. Since 2012, the NPPF has been updated several times including in 2018, 2019, 2021, and 2023 albeit that there have not been fundamental changes.
- 7.10. The NPPF schedule at Appendix 2 which reviews LPSS policies for consistency against the current NPPF reflects that the LPSS policies remain broadly consistent with the NPPF. However, several changes to legislation, policy and guidance are highlighted in the schedule. These include:
- changes to the Use Classes Order (including the introduction of Use Class E) and permitted development rights, which allow a wider range of uses without the need for planning permission. This has had the effect of reducing the scope of application of some of the LPSS employment and retail policies and in limited cases making some of the requirements more challenging to apply.
  - updates to legislation, planning policy and guidance impacting the expected content of Local Plans following the adoption of the LPSS. These include the NPPG introduction of requirements for Local Plans to set an expectation for the provision of First Homes and the 2021 Environment Act's mandatory 10% biodiversity net gain requirement to be secured as a planning condition on qualifying development. However, changes such as these occurred prior to the submission and adoption of the LPDMP and they have been incorporated into this second part of the Local Plan (in the case of the latter at a higher standard than that specified nationally). This has allowed the Council to keep its Development Plan up to date and in line with more recent national legislation, policy and guidance.
- 7.11. It is important to note, that this assessment of consistency with national policy is undertaken at a point in time where significant changes to the national planning system are underway.

- 7.12. Although these national reforms are not yet concluded and much of the detail remains unknown, it provides important context for the review of the LPSS, as it points to the likelihood of an imminent and significantly changed context for plan-making.
- 7.13. A notable step toward this altered context was the publication LURA in late 2023. Whilst much of its implementation is dependent on further secondary legislation/regulations, the Government has also indicated that several further changes to the national planning context are planned to include:
- the publication of a new NPPF (this is more wide-ranging and distinct from the targeted changes that were consulted upon from December 2022 – March 2023 and which was published on 20 December 2023);
  - a proposed set of National Development Management Policies that will have the same status as Local Plan policy and with which local policy will not be allowed to conflict nor duplicate.
- 7.14. Further, Government intends to introduce ‘new style’ Local Plans as part of their planning reform process which are proposed to be:
- in the form of a single Local Plan, which is concise, more visual, and focussed on locally important matters.
  - prepared over a 30-month process, supported by proportionate evidence, following a series of ‘gateway’ assessments and formal examination which is limited to 6 months.
  - initiated, potentially in a staged process, commencing from autumn 2024 when Government indicates that relevant regulations, policy, and guidance will be in place to enable their production.
- 7.15. In this context, whilst the LPSS remains broadly consistent with the current NPPF (although there are a few areas where an update would ensure greater alignment), officers consider that an update would provide the opportunity to ensure that the Council’s Local Plan remains consistent with national policy into the future. Government

intentions for planning reform thus also favour a decision to update the Local Plan, in the form of a 'new style' Local Plan, as and when their proposals are realised. This would include consideration of any changes to the nature and form of Local Plans and supporting evidence, alongside consultation processes and impacts on Guildford borough's plan-making processes.

### *Changing circumstances affecting Guildford borough*

- 7.16. There are several changed circumstances affecting the borough. An extensive evidence base has not been developed for the purposes of this review and the findings below do not seek to be comprehensive. This is considered a proportionate approach and in line with the NPPG<sup>4</sup>.
- 7.17. The following summary draws upon officers' review of the LPSS in relation to key considerations highlighted by the NPPG (Appendix 1) and the PAS matrix at Appendix 3. It reflects upon changing circumstances impacting on Guildford borough including in relation to local housing need; the economy; delivery of key site allocations and infrastructure; and the local environment and heritage context.
- 7.18. First, regarding local housing need. It is highly likely that moving forward, this figure will be different to that set out as an annual housing requirement of 562 dwellings per annum (dpa) in the LPSS. At this stage, the standard method produces a local housing need figure of 771 dpa for Guildford borough – an approx. 37% increase on the housing requirement figure.
- 7.19. The NPPG indicates that local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method<sup>5</sup>. However, this will require careful consideration as there are a range of uncertainties, which include:
- Potential changes to the standard method figure – it is not yet clear whether this figure for Guildford will change significantly

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<sup>4</sup> See NPPG: Plan-making at Paragraph: 068 Reference ID: 61-068-20190723

<sup>5</sup> See NPPG: Plan-making at Paragraph: 062 Reference ID: 61-062-20190315



based on new population projections / updates to the standard method. Government indicate that they will review the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2025.

- The basis for and degree to which reforms to the planning system will enable divergence from the standard method. Government has yet to clarify whether they will make clearer in the Framework that the outcome of the standard method is an advisory starting-point to inform plan-making – a guide that is not mandatory. Further they have yet to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method. Further demographic evidence would need to be undertaken to explore whether there is a case for Guildford to seek to justify divergence (e.g., based on previous overestimates due to student figures); however, this can only be undertaken once the new Standard Method / projections are published and then only tested through the plan-making process.

7.20. Thus, the review only considers the standard method figure for Guildford as it is, rather than whether there are exceptional circumstances which justify an alternative approach<sup>6</sup>. However, in short, the significant divergence between the LPSS housing requirement and the standard method figure contributes to the case that the Plan should be updated.

7.21. Second, there have been changes in the economy during the past five years. In this regard, there are several aspects that are particularly relevant to planning:

- (a) The first is a change in shopping patterns. A greater proportion of shopping, particularly for comparison goods, is taking place online and this is forecast to continue increasing. This is the case nationally, as it is for Guildford. Consequently, the amount of floorspace needed for this type of retail activity is significantly less than was forecast as an input to the LPSS. The LPSS is, however, flexible in terms of the allocation of this form of floorspace. The

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<sup>6</sup> See NPPF paragraph 61

production of updated evidence<sup>7</sup>, allowed for under the LPSS, contributed to enabling the Council to support an application reflecting a significantly altered proportion of retail (and other non-residential) floorspace than was initially envisaged under the North Street redevelopment site allocation (LPSS Policy A5).

- (b) The second is a change to employment patterns, and general changes in demand for various forms of office floorspace. The Council has yet to undertake an update of its Employment Land Needs Assessment (ELNA) and the impacts for Guildford borough are thus not yet known. However, the previous few years have shown an overall loss of office floorspace within the borough<sup>8</sup>. It is also not clear whether there is appetite to take up the allocated office floorspace in the Local Plan (albeit that 10 years remain in the plan period and further shifts may occur). Further, the Council's Economic Development Strategy<sup>9</sup> has highlighted several barriers that need to be overcome if the Council's ambitions for increased office floorspace are to be met. These include the provision of well-located high quality floorspace, alongside lower cost opportunities for innovators and entrepreneurs. An update to the Plan will provide an opportunity to interrogate further any potential shifts in the nature and extent of need for office floorspace in the borough and to continue to plan accordingly.
- (c) The third is a general trend of continued strong demand for storage, distribution, and logistics floorspace, in part in a response to changes in the way people shop for goods. As with the case of office floorspace, a future update of the Council's ELNA will assist in providing clarity regarding any specific changes in need for this form of floorspace in Guildford borough.

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<sup>7</sup> See the Retail Planning Statement and further retail planning advice for the Council in relation to the proposed Redevelopment of the North Street site - application ref: 23/P/01211

<sup>8</sup> See GBC Authority Monitoring Reports available at: <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>

<sup>9</sup> See Guildford Economic Development Strategy (2023) available at: <https://www.guildford.gov.uk/article/25424/Strategies-and-economic-information>

- (d) The fourth is a change within the (residential) property market, which is strongly influenced by interest rates and the cost of development, including building, finance, and labour costs. In all aspects, the past several years has reflected a period of volatility. Changes in the property market are particularly relevant to the level of viability of development. Whilst the Council's viability evidence is relatively recent, having been updated to support the LPDMP, an update to the Local Plan would provide the opportunity to revisit viability and its relationship to a range of infrastructure and policy costs to ensure that development continues to be deliverable.
- 7.22. All these shifts in economic circumstances have relevance for the review. In this regard, whilst the full details of changes reflected upon are in most cases not yet locally nor recently quantified, it is considered that there is sufficient indication of changes in economic circumstances to support a review finding that the LPSS should be updated.
- 7.23. Third, there have been changes in the anticipated trajectory of delivery of key LPSS site allocations. Whilst at adoption the Plan's trajectory had indicated that several strategic sites<sup>10</sup> would together begin to contribute to housing delivery in the first five years of the Plan, this has not occurred for a variety reasons. Indeed, the most recently published housing trajectory<sup>11</sup> indicates that delivery on these sites is only likely to begin from 2028/29 onward. Whilst these sites have been delayed, some windfall development has occurred, including significant levels of purpose-built student accommodation which has assisted in maintaining a robust 5-year housing land supply position over the review period. An update will provide an opportunity to ensure that the Council can continue to put forward deliverable and developable site allocations.

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<sup>10</sup> These are the major urban extensions at Gosden Hill Farm (LPSS Policy A25) and Blackwell Farm (LPSS Policy A25), alongside the new settlement at the Former Wisely Airfield (LPSS Policy A35).

<sup>11</sup> See page 347 Appendix 8: Five Year Housing Land Supply available at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>

- 7.24. Fourth, regarding key infrastructure to support plan growth, whilst some planned infrastructure has been or is progressing toward delivery, its provision is often contingent upon delivery of homes, including the strategic sites. As noted, much of this growth has yet to come forward and the specific mitigation packages for several strategic sites are not yet agreed. There has, however, been a confirmed significant change in planned key supporting infrastructure in that the A3 Guildford scheme is no longer part of National Highways Road Investment Strategy (RIS) as was anticipated at the time of adoption of the LPSS.
- 7.25. Finally, regarding changes in local environmental or heritage context, the review has not indicated that there are clear and confirmed changes that would impact on the delivery of the plan. This is not surprising as changes in this context typically do not occur rapidly. However, the review has noted several processes in this area which have the potential to influence planning in the borough in the future, including:
- ongoing work by Natural England to review the Surrey Hills AONB (now Surrey Hills National Landscape) boundary, potentially significantly increasing the area protected by this designation;
  - work by the EA on flood modelling and the mapping of flood zones (which has been updated since the LPSS was adopted), as well as their joint investigation with the Council regarding the potential for a flood alleviation scheme in Guildford town centre;
  - continued work to monitor air quality and the declaration of a new air quality management area (AQMA) in Guildford town centre.
- 7.26. An update to the Local Plan would enable further consideration of the outcomes of these processes and any implications for plan-making.

*Opportunity to address new and emerging priorities for the Council*

- 7.27. The adoption of the LPDMP in 2023 enabled the Council to respond to several environmental priorities, including biodiversity, protection of heritage assets, and climate change. In doing so, it sought to balance achieving high standards, such as class leading levels of biodiversity net gain, whilst not threatening the overall delivery of development. An update to the Local Plan would provide an opportunity to revisit

priorities and ensure the Council's Local Plan continues to deliver across its strategic objectives and in alignment with the Council's Corporate Strategy.

c) Implications for plan-making and decision-taking

7.28. It is important to stress that the findings of this review, which point to the need to update the LPSS, do not change any of the elements of the adopted Plan, nor mean that it is redundant. To change the LPSS would require an 'update' of the plan rather than a 'review', as the latter merely concludes whether an update is necessary.

7.29. Further, the LPSS policies (alongside those of the LPDMP and other Development Plan Documents / DPDs) remain the primary consideration in terms of determining planning applications. The NPPF indicates at paragraph 225 that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the latest NPPF. Due weight should be given to them, according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). For the most part the LPSS policies are consistent with the NPPF.

7.30. It is important to highlight the implications of the review findings regarding how 5-year housing land supply will be assessed after the LPSS is five years old. The NPPF reflects the following at paragraph 77:

*'...local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing<sup>[...]</sup>, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old<sup>12</sup>.*

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<sup>12</sup> *Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance'.*

7.31. This review does not seek to claim that the strategic policies including Guildford borough's housing requirement of 562dpa do not require updating. In accordance with the NPPF, Guildford borough will need to demonstrate at least a five-year housing supply against the standard method figure in future. It is envisaged that a future Land Availability Assessment (LAA) and associated 5-year housing land supply calculation will need to reflect upon this changed circumstance with updated supply and local housing need figures at that time. At this stage it is not possible to confirm whether the Council will in future continue to have a robust 5-year housing land supply. Variables both in terms of the future supply of deliverable sites, and potential changes to levels of local housing need (in terms of the standard method calculation) will determine this outcome.

## **8. Consultations**

- 8.1. As part of the review process, the Council has undertaken consultation with its DtC partners. A summary of responses received is outlined at Appendix 4. The comments received in the main relate to strategic matters that will require cooperation as part of the update process rather than the review process.
- 8.2. Further, prior to finalisation of this report, internal consultation has included discussion of the scope of the review with the Joint Executive Advisory Board (see section 15 below) and Planning Policy Board.

## **9. Key Risks**

- 9.1. Should the Council decide to update the LPSS, key risks relate primarily to current levels of uncertainty relating to the planning reform process. Government has indicated the latest date for plan-makers to submit local plans for examination under the current system as 30 June 2025. This timeframe is clearly unachievable for Guildford borough considering the need for evidence gathering, plan drafting and at least two rounds of consultation prior to submission.
- 9.2. A likely scenario will thus be the drafting of an updated or new-style Local Plan under a reformed planning system including National Development Management Policies and a new NPPF; however, many

requirements of new style plan-making are not yet clear. In order to manage this risk, officers propose that further consideration is given to planning reforms as they emerge and a timetable and budget requirements are proposed in this context. If the Government's reforms do not come to pass, this approach remains prudent.

- 9.3. Should the Council decide to not update the plan, the plan risks becoming less aligned to national policy over time and less effective as a tool to support decision-taking within a plan-led system.
- 9.4. Further, there is a risk that the adopted plan may not provide a 5-year housing land supply at some point in the future. The likelihood of this risk being realised is increased once the standard method is used to calculate the Council's 5-year housing land supply figure and should planned housing supply not come forward. Without an update to the Local Plan, the potential exists that any such period, where the Council's strategic housing policies are considered out of date and NPPF paragraph 11d is engaged, is extended. Should this come to pass, it would weaken the Council's position in relation to refusing planning permission or defending appeals in relation to inappropriate and/or unplanned speculative development. Updating the Local Plan is a clear means by which the Council can mitigate this risk.

## **10. Financial Implications**

- 10.1. A further report will be prepared which will clarify the budgetary requirements of the Local Plan update. This would be subject to its own decision in terms of approval of budget and timeframes for this undertaking. These details are not yet known and may be influenced by planning reform proposals. As such, this report results in no immediate financial implications for the Council.
- 10.2. The production of a Local Plan is a costly, time-consuming and resource intensive process, requiring a capacitated internal team alongside funding for specialist evidence base, legal support, community consultation, examination including independent Government Inspector and Programme Officer costs. Estimates several years ago were that the cost of producing a Local Plan were

around £1m for a Local Authority over a four-year period<sup>12</sup>. This may be considered somewhat low in terms of accounting for the full cost of production of the Plan. Cost is influenced by the complexity of the Plan, the level of public engagement and the time taken to produce it, amongst other factors.

- 10.3. The Planning Policy team does not currently hold sufficient budget to support the production of an updated plan with the 2024-25 budget for specialist consulting work in the region of £100,000. Further, a reserve amount that was set aside for Local Plan production has been removed as part of recent savings initiatives. Thus, it is envisaged that subject to agreement that an update of the Plan is required, a further report to be tabled would include a growth bid seeking to cover plan-making costs over a number of financial years.

## **11. Legal Implications**

- 11.1. The review is undertaken in line with regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). In this regard, the Council is required to complete the review of the LPSS every five years, starting from the date of adoption of the local plan (i.e., in this case by 25 April 2024).
- 11.2. Any decision recommended to full Council takes account of the risks, benefits and duties set out in this report.

## **12. Human Resource Implications**

- 12.1. The decision to update the Plan will be followed up by a detailed report setting out the proposed timescales for this process. The update will require a fully staffed planning policy team and would require inputs from other Council teams during the plan-making process.

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<sup>12</sup> See RTPi: Proposals for Planning Reform in England, 2021 available at: <https://www.rtpi.org.uk/policy-and-research/planning-for-a-better-future/#M-1.1>



### **13. Equality and Diversity Implications**

- 13.1. Public authorities are required to have due regard to the aims of the Public Sector Equality Duty (Equality Act 2010) when making decisions and setting policies. Whilst LPSS policies may materially impact on equality issues, those policies are not being updated by this report. It has therefore been concluded that there are no equality implications arising directly from this report.
- 13.2. It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups with protected characteristics. Any future work undertaken in relation to updating of Local Plan policies will, where necessary, include the completion of an Equalities Impact Assessment (EqIA) to demonstrate how the proposed updates impact on persons with protected characteristics.

### **14. Climate Change/Sustainability Implications**

- 14.1. There are no direct climate change / sustainability implications arising from this report. Should it be concluded that an update to the Local Plan is appropriate, this process will provide an opportunity to consider further policy to support the Council's climate change priorities.

### **15. Joint Executive Advisory Board comments**

- 15.1. Whilst this report was not tabled at the Joint EAB meeting on 4 December 2023, a presentation was made to the meeting on the context and scope of the Local Plan review. The Joint EAB confirmed their understanding of the difference between the current 'review' process compared to any future 'update' process which would entail the full plan-making process and include public participation. They also understood the reasons why the review process was recommending the LPSS be updated.

## **16. Summary of Options**

- 16.1. The review of the LPSS points to its update being an appropriate course of action. The alternative course of action would be to not update the LPSS; however, over time this would likely result in the Plan becoming less effective. It is in the Council's interests to maintain an up-to-date Local Plan.

## **17. Conclusion**

- 17.1. In light of the review of the LPSS, officers' recommendation is that the Local Plan should be updated. This will assist in ensuring that the Plan remains effective into the future and responds to existing and imminent changes to National Policy, Guidance and Legislation. Importantly, local changes in circumstance indicate that an update is an appropriate course of action. Should the decision to update the Local Plan be supported, a further report will be prepared to propose appropriate timing for and budgetary requirement of the Local Plan Update. This would consider planning reform proposals including Government's timescales for initiating 'new style' Local Plans.

## **18. Background Papers**

None

## **19. Appendices**

Appendix 1: NPPG extract

Appendix 2: The NPPF Schedule

Appendix 3: The PAS Matrix

Appendix 4: DtC responses summary