

Meeting Local Plan Advisory Group

Date and Time Monday, 23rd November, 2020 at 4.00 pm.

Venue This meeting will be held virtually and a live audio stream can

be listened to via www.winchester.gov.uk.

Note: Owing to the ongoing Covid-19 pandemic and government guidance, it will not be possible to hold this meeting in person. The Council has therefore made arrangements under the Coronavirus Act 2020, and subsequent Regulations permitting remote meetings, to hold the meeting virtually. If you are a member of the public and would like to listen to the audio stream of the meeting you may do so via www.winchester.gov.uk

AGENDA

PROCEDURAL ITEMS

1. Apologies

To record the names of apologies given.

2. Disclosure of Interests

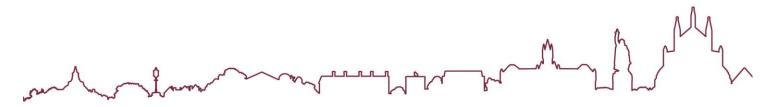
To receive any disclosure of interests from Members and Officers in matters to be discussed.

Note: Councillors are reminded of their obligations to declare disclosable pecuniary interests, personal and/or prejudicial interests in accordance with legislation and the Council's Code of Conduct.

3. To note any request from Councillors to make representations on an agenda item

Note: Councillors wishing to speak about a particular agenda item are required to register with Democratic Services three clear working days before the meeting (contact democracy@winchester.gov.uk or 01962 848 264). Councillors will normally be invited by the Chairperson to speak immediately prior to the appropriate item.

4. Minutes of the previous meeting held on 14 September 2020 (Pages 5 - 10)



5. **Public Participation**

– to receive and note questions asked and statements made from members of the public on issues relating to the responsibility of this Advisory Group. NB members of the public are required to register with Democratic Services three clear working days before the meeting (contact <u>democracy@winchester.gov.uk</u> or 01962 848 264)

BUSINESS ITEMS

Members of the public and visiting councillors may speak at Local Plan Advisory Group, provided they have registered to speak three working days in advance. Please contact Democratic Services by 5pm on Tuesday 17 November 2020 via democracy@winchester.gov.uk or (01962) 848 264 to register to speak and for further details.

6. Local Plan Action Plan - Presentation and Action Plan (Pages 11 - 48)

Lisa Kirkman Strategic Director: Resources and Monitoring Officer

All of the Council's publicly available agendas, reports and minutes are available to view and download from the Council's Website and are also open to inspection at the offices of the council. As part of our drive to minimise our use of paper we do not provide paper copies of the full agenda pack at meetings. We do however, provide a number of copies of the agenda front sheet at the meeting which contains the QR Code opposite. Scanning this code enables members of the public to easily access all of the meeting papers on their own electronic device. Please hold your device's camera or QR code App over the QR Code so that it's clearly visible within your screen and you will be redirected to the agenda pack.



13 November 2020

Agenda Contact: Nancy Graham, Senior Democratic Services Officer, 01962 848 235, ngraham@winchester.gov.uk

<u>MEMBERSHIP</u>

Local Plan Advisory Group

Councillor Porter (Chairperson)

Cllr Brook

Cllr Evans
Cllr Ferguson
Cllr Horrill
Cllr Rutter
Cllr Thompson

TERMS OF REFERENCE

The purpose of the Advisory Group is to receive updates and discuss matters relating to the preparation of the Council's Local Plan and to assist the Cabinet and Council in their decision making so as to ensure:

- that the preparation of the Local Plan is integrated with the wider aims and objectives of the Council on behalf of its communities
- that Members are actively informed on progress on the Local Plan and provided with appropriate opportunities to participate in policy development
- that there is a shared understanding of issues relating the preparation of the evidence base, arrangements for community involvement, duty to cooperate with neighbouring authorities, preparation and publication of documents and associated public consultation.
- that there are high levels of public engagement with the preparation of the Local Plan

Whilst noting that decision making is a matter for Cabinet and Council, the Advisory Group may be expected to comment upon:

- the implications of the emerging evidence base and arrangements for community involvement; publication of preparatory draft documents and associated public consultation.
- any Local Plan document for initial consultation;
- any Proposed Submission Local Plan Document prior to submission to the Secretary of State.
- the Inspector's report and recommended modifications after the Examination.

Whilst it will normally meet in public the Advisory Group may meet privately to discuss matters which are confidential or policy related at the discretion of the Chairperson. As a non-decision making body the format of information and advice to the Advisory Group will primarily be by presentation and oral update rather than written report. A brief minute of the Advisory Group will be taken.

PUBLIC PARTICIPATION

To receive and note questions asked and statements made from members of the public on matters which fall within the remit of the Advisory Group.

NB members of the public are required to register with Democratic Services three clear working days before the meeting (see above for further details).

Filming and Broadcast Notification

This meeting may be recorded and broadcast live on the Council's website. The meeting may also be recorded and broadcast by the press and members of the public – please see the Access to Information Procedure Rules within the Council's Constitution for further information, which is available to view on the Council's website.

LOCAL PLAN ADVISORY GROUP

14 September 2020

Attendance:

Councillors
Porter (Chairperson)

Brook Rutter Evans Thompson

Horrill

Full audio recording and video recording

1. **APOLOGIES**

Apologies were received from Councillor Ferguson.

2. **DISCLOSURE OF INTERESTS**

No declarations were made.

3. TO NOTE ANY REQUEST FROM COUNCILLORS TO MAKE REPRESENTATIONS ON AN AGENDA ITEM

Councillors Bell and Hutchison addressed the meeting as summarised briefly below.

Councillor Bell stated that considerable changes were proposed in the planning reforms and that the briefing for parish councils was welcomed. There was considerable emphasis on development in the southeast of England which raised questions of additional pressures and affordability. There were particular constraints in the east of the district due to the South Downs National Park (SDNP), which comprised 40% of the council's area. The Council for the Protection of Rural England (CPRE) were also seeking a greenbelt in the south of the district which would lead to even more pressure on the central, western and northern parts for development. There were also implications for affordable housing and the provision exception sites and the emphasis of the proposals for provision of first homes would have implications for those desiring family homes in rural sites. The second paper 'Planning for the Future' and proposals for zoning system would lead to different designations which would affect the Winchester area. Work would be required through local neighbourhood plans to consider the implications of the zoning and protection. Finally, the launch of the new local plan also required a separate council website.

Councillor Hutchison raised questions over the role of design statements, the protection of open spaces and the designation of settlement boundaries,

including those on the periphery of Winchester Town which had implications for open spaces.

4. MINUTES OF THE PREVIOUS MEETING HELD ON 21 JULY 2020

Arising out of consideration of the minutes, a member raised questions on the progress on the publication of the Visual Design Statements. The Strategic Planning Manger responded to the question.

RESOLVED:

That the minutes of the previous meeting held on 21 July 2020 be approved and adopted.

5. **PUBLIC PARTICIPATION**

Patrick Davies addressed the meeting as summarised briefly below.

Mr Davies stated that it would have been beneficial if the officers' presentation to be made at the meeting could have been made available to the public in advance of the meeting. The city council's website for the local plan was also out of date and required revising. This was important if the public were going to be involved in the new local plan process. He asked if the proposals in the planning reforms which proposed more housing through an algorithm formula for Winchester would be challenged and how. The council had recently published the Retail, Leisure and Town Centre Uses Survey on Winchester, which he stated had been undertaken in September 2019 and he asked about the status of background material produced pre Covid 19 and before commencement of the new local plan process.

Emma Back (Winchester Sport Art and Leisure Trust) addressed the meeting as summarised briefly below.

The City of Winchester Trust and the CPRE had spoken at the previous meeting of the Advisory Group on the protection of green space through the local plan process. This would be both in the countryside, which had its own protection through for example the SDNP but also in the city settlement area where public open spaces were small and limited and required protection. Action to protect key areas of recreational open space and other open spaces around the city was required as sites were vulnerable. Open spaces for sport and recreation should be recognised in the new local plan and be given protection status under the new planning laws, including council owned sites. In addition, she asked if Village Green Space designation would still apply and could sites still be put forward by the public for this designation under the new local plan process.

The Chairperson thanked the speakers for their personal views and clarified that these were not necessarily the views of the Council. Councillor Porter responded to a point made by Patrick Davies clarifying that the survey on Retail, Leisure and Town Centre Uses had been written in spring 2020 and did acknowledge the effect of Covid 19. Other background papers on the website

would be the up-dated and revised as required as part of the new local plan process.

6. PRESENTATION AT THE MEETING - PROPOSED PLANNING REFORMS AND IMPACT ON THE NEW WINCHESTER LOCAL PLAN

The Chairperson stated that on the 6 August 2020 the Government had published two papers for consultation. The first was a white paper: 'Planning for the future' which had a deadline for consultation on the 29 October 2020. The second paper was entitled: 'Changes to the current planning system' with a deadline for response of the 1 October 2020.

The Strategic Director's <u>presentation</u> refers and the officers responded to Members' questions on the following:

- How would high quality design be decided upon?
- How was the formula for housing allocations derived?
- The inter-relationship between the SDNP's housing allocation and that of Winchester, as 40 per cent of the district's area was within the South Downs National Park.
- The definition of sustainable development and did it include infrastructure.
- The implications of removing the duty to cooperate with neighbouring authorities.
- The implications for neighbourhood plans, of which parish councils were very supportive and how communities could be involved in the local plan process.
- Methods for the city council to assist parish councils and local communities within a limited time period in order that the best designs and plans were included in the pattern book, in order that the new local plan could best meet the requirements of the new planning system. Village Design Statements and Neighbourhood Plans could assist towards achieving good design codes.
- That there should be cross political representation to the Government over its proposals and implications for the district and also the implications for the SDNP and Partnership for South Hampshire (PfSH) and other local authorities the area.
- The action that could be taken in the short term towards the renewal of the local plan. Neighbourhood Plans were involved and lengthy to produce and alternatives might be considered.
- How could localism be reflected in the local plan process, including Conservation Area Assessments and Village Design Statements.

- The city council's capacity to undertake the new local plan process and the skills that were available to deliver the new requirements and also the assistance that could be provided to local communities to assist in their preparation for the new local plan.
- For growth areas, whether the Pattern Design Book could lead to more uniform development that lacked individuality. In renewal areas how would neighbours be protected from development and how would Conservation Areas be approached? Would the design codes be suitable for Winchester's smaller communities and how would the Community Infrastructure Levy (CIL) be managed and infrastructure provided?
- The implications of the proposals for the future work of the Planning Committee.
- The short-term effect on the delivery of affordable housing if the threshold for contribution towards affordable houses was raised from 10 units to 40 or 50 units.
- That consideration be given to the council becoming a pilot authority for the new planning system. The advantage was that the council had already undertaken considerable work and had employed Consultants to develop a stand-alone website for the Local Plan but had put them on hold and would need to be reviewed in light of the emphasis on digital engagement. Having the SDNP and PfSH and a historic core both to the city as well as the rural villages would put Winchester in a good position to be a pilot.

Following debate the following actions were agreed:

- To proceed with Conservation Area Assessments and Village Design Statements and Area Design Assessments for the centre of Winchester.
- 2. To engage in discussions with the South Downs National Park, Partnership for South Hampshire, to lobby local Members of Parliament, and the Chamber of Commerce and related organisations in order that they understand the implications of the proposed changes.
- 3. To identify what the Government proposals would mean if the threshold for affordable housing was increased from 10 units to either 40 or 50 units and to be conscious that first homes link then to second homes and to last homes and to recognise this is important and also to consider the mix of affordable housing in relationship to home ownership.
- 4. That the council puts itself forward as a pilot authority for the new planning system.

- 5. That members of the Advisory Group be invited to virtually attend the parish council briefing on Monday 21 September 2020 and also the meeting of the Winchester Town Forum to be held on Thursday 17 September 2020.
- 6. That a work programme be prepared including engagement with local communities.

The meeting commenced at 5.00 pm and concluded at 6.55 pm

Chairperson



23rd November 2020

Three key events have influenced the local plan process:

 Proposed governmental reform to the planning system (via the White Paper 'Planning for the Future' and separate consultation on housing targets)

Covid-19 pandemic



Declaration of a climate emergency



HOW AND WHY DO THESE EVENTS IMPACT THE LOCAL PLAN PROCESS?

Reform:

- National development management policies?
- Housing targets significantly increased?
- Reduced need for evidence base studies?
- Increased use of design codes to control impacts of development.

Govid-19:

- Short term: face to face consultation
- Honger term: changes to transport patterns, how we work, economy, town centre vitality and types of places we are planning for.
- ெ Climate emergency Local plan is one of the key means of addressing this (subject to national policy).



SHORT TERM IMPACT ON THE LOCAL PLAN PROCESS

- Internal WCC Officer workshop with SDNPA and East Hants LPAs to consider the proposed governmental reforms



OUR PLAN FOR MOVING FORWARD

- Manalysed White Paper in detail and produced a 'Local Plan Action Plan' (Cabinet date: 16th December)
- Produced an Action Plan: the road map. Enables us to move forward, and in future pivot from the current system to a reformed system.

!! Key aims:

- # minimise unnecessary/ abortive work and expense
- # ensuring progress continues to be made.
- # ensure we are ready when reforms come into force



LOCAL PLAN ACTION PLAN

- A number of workstreams have been identified:
 - **Engagement**
 - **69** Options for Accommodating Growth

 - Skills and Resourcing'

- Fach workstream has a number of actions:
 - Green: can progress now
 - amber/red: require clarification from Government. Timing of these actions will be refined as detail becomes clearer.



ENGAGEMENT –

- Proposing to undertake a high-level consultation on 'Strategic Issues and Priorities' in Feb/Mar 2021. This will:
- focus on the local plan's vision;
- objectives; and
- key issues and priorities for action.
- The consultation will not include options for accommodating specific housing targets but it will include questions on a strategy for how the future development could be accommodated.



ENGAGEMENT –

- Local plan branding and new website are being developed
- - Parish Councils SHELAA assessment/ potential growth/ renewal/ protection areas
 - Further 'Call for Sites' to include small sites, self build, land for biodiversity net gain/ carbon neutrality/ nitrate neutrality/renewable energy/green infrastructure
 - the need to front-load technical/ environmental information on site constraints and mitigation, in support of SHELAA sites, to underpin future Design Codes



OPTIONS FOR ACCOMMODATING GROWTH

- Explore issues around potential green belt designation and options for undertaking an urban capacity assessment
- Consider options for meeting Gypsy and Travelling Show Peoples' needs
- ⊕ Once housing target is confirmed:
 - # update evidence base as needed based on revised population projections



DESIGN CODES AND POLICY

- Audit existing design statements in the district (e.g. Village Design Statements, Local Area Design Statements, Conservation Area Character Assessments, Design Codes for Strategic Sites).
- Festablish a Design Codes Working Group
- Review content of existing Design Codes and best practice elsewhere.
- Explore options for pilot project to update existing VDS and incorporate work that could feed into a Design Code under new system



DESIGN CODES AND POLICY

- Monce we have clarity on the 'National Model Design Code' and process for proving local Design Codes are 'provably locally popular', begin to explore options for producing Design Codes collaboratively with a range of stakeholders.



GETTING DIGITAL READY

- Launch new local plan website enhanced digital engagement
- Here Audit available GIS data, to produce an interactive map for the local plan website
- Explore existing opportunities offered within the Property Technology ("PropTech") sector, such as 3D modelling at city scales and digital engagement platforms
- Explore opportunities for mapping receipt of CIL funds and where invested back into community projects.
- Consider issues of data ethics and principles/ code for ethical use of data made available by WCC

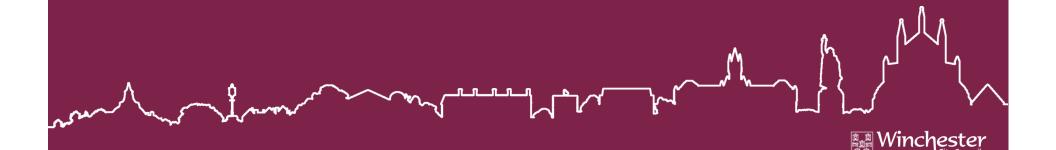


SKILLS AND RESOURCING

- Handit of existing skills within the Council:
 - Geospatial mapping/ GIS
 - Master-planning
 - Urban design
- Consider options for filling the role of 'Chief Officer for Design and Placement'
- Explore external funding options e.g. via Innovation Fund/ Future 2050
- Training to support the delivery of Design Codes



Questions



Winchester City Council Local Plan

Draft Action Plan

13 November 2020



Introduction

- WCC has been working towards a new Local Plan since 2018. However three recent significant events impacted on the Local Plan making process, consequently timetable and this action plan:
 - In 2019 the Council declared a climate emergency. The Local Plan is one key way we can impact climate change mitigation and adaptation.
 - The Covid pandemic has impacted the ability to conduct face to face consultation/engagement and also influenced life in many ways including transport patterns, vitality of our retail centres and the way we use our homes.
 - Central Government has recently issued a White Paper setting out proposals for significant reform of the planning process and changes to the existing system which will likely see a large increase in the number of new homes we will have to plan for¹. Consequently the Government's proposed reforms would fundamentally change the local plan preparation process and the way we determine planning applications.
- 2. As a result of the above the Council staff held a workshop (with officers from South Downs National Park Authority and East Hampshire District Council also) to consider the potential implications of the proposed reforms, and our suggested response. Drawing from the discussion at that workshop, this Action Plan has been prepared to set out the road map for continuing to progress the local plan in whatever form it ultimately takes. It seeks to ensure progress continues to be made on the Local Plan preparation, whilst also ensuring WCC is 'White Paper Ready' when the reforms come into force.
- 3. Appendix 1 to this Action Plan sets out the White Paper proposals, their implications for our local plan process, and the actions which WCC is proposing to take. Actions which can be undertaken immediately are shaded green. Actions which cannot yet be undertaken are shaded orange/ red, in recognition that these actions rely upon certain action by parties outside of WCC (such as the need for clarification of housing targets by Government and introduction of new national legislation and policy).
- 4. This Action Plan will be reviewed and updated periodically, so that once such clarification is received, action can be taken as specified. Timing of actions marked amber/ red will be refined during each review.
- 5. The table below summarises the key actions which will be taken to progress the Local Plan.

¹ https://www.gov.uk/government/consultations/planning-for-the-future

	Current Actions (Nov 2020- March 2021)	Next steps April – Sept 2021 (Approximately) (Actions in this column will be categorised amber/ red once more detail becomes available)	Next steps October 2021- March 2022 (Approximately) (Actions in this column will be categorised amber/ red once more detail becomes available)
Engagement	A new website will be developed as the primary vehicle for engagement on the emerging local plan. February 2021. Maintain website to hold Council papers and responses to Government consultations, alongside details of feedback received on the draft plan.		
	Encourage people to sign up to the new website, to receive updates and participate in discussions around topical issues. Aim to create a district wide group of interested parties to feed into the local plan process.		
	WCC had intended to consult on Strategic Issues and Options in Q4 2020. Due to uncertainty around housing targets, this consultation will be re-focused. A high-level consultation on 'Strategic Issues and Priorities' will be undertaken in Feb/Mar 2021, which will focus upon the local plan's vision, objectives, key issues and priorities for action. The consultation will not, however, contain fine-		odology for setting ailed proposals for accommodating

grained detail on options for accommodating housing targets. In consulting on priorities for action, we will seek views on the 2019 declaration of a climate emergency, and how local plan measures can assist in addressing climate change concerns and reduce the carbon footprint of the district.	If reforms have come into force by this point in time, consultation will focus upon land to be included in growth/ renewal/protected areas.
WCC will seek to engage a wide range of participants at this high level stage, with enhanced emphasis upon digital engagement, consistent with the aims of the recent White Paper and public health measures due to Covid-19.	
We want developers to submit more detailed information about site constraints and opportunities which could be used to inform designation of future growth/ renewal/ protections areas and underpin Design Codes for these areas if necessary.	Once reforms come into force, design codes will need to be prepared for growth areas – these may need to include mitigation (e.g. to address flooding, climate change). Site promoters may need to provide technical reports in support of sites they promote, to show they are deliverable and that constraints can be addressed.
Set up a series of meetings with Parish Councils in Q1 2021 on initial SHELAA assessment and on potential locations/ sites for Growth/ Renewal/ Protection Areas in a new style local plan.	
Undertake a further 'call for sites' in Q1 2021, with additional emphasis upon opportunities to build out small sites, self-build, land for biodiversity net gain or carbon off-setting/ nitrate neutrality or renewable energy or employment uses under the new Use Class Order.	
Update Local Development Scheme (the timetable for	

	preparation of and consultation on the local plan as and when necessary. Communicate any updates on the new local plan website.		
Options for Accommodating Growth	Continue with the SHELAA Assessment, with the expectation that SHELAA sites may in future form the basis of 'Growth Areas' under a new style Local Plan. Criteria for assessment of sites will be expanded to include issues arising in the White Paper such as whether sites represent 'sustainable development', options for self-build and whether sites could accommodate, for example, a variety of development types understanding appropriate density and assess the ability for the site to access public transport/ walking routes. When assessing SHELAA and selecting options for accommodating development in the district, it may be necessary to include reserve sites, should viability issues prevent development of some of the preferred options.	quantum of developm Await outcome of Gov consultation on methol housing targets before	eveloped and ere is clarity about the ent to be planned for. vernment's odology for setting
	Engage with Parish Councils on locations/ sites which could potentially form the basis of a Growth/ Renewal/ Protection Area in a new style local plan, alongside an urban capacity assessment to understand capacity for accommodating growth within existing boundaries.		
	Explore issues and seek further engagement around potential green belt designation.		

	Undertake a further call for sites as detailed above.	
	Using information from the updated Gypsy, Traveller and Travelling Showpeoples' assessment, engage with these communities and consider options for meeting any needs identified.	
		Once WCC's housing target is set by government, commission updates to evidence base as needed (for example - employment evidence is based upon population projections and may need updating if housing targets rise significantly; retail evidence may also need updating as a result of Covid-19)
Design Codes and Policy	Undertake an audit of existing design statements in the district, e.g. Village Design Statements, Conservation Area Appraisals, Local Area Design Statements Design Codes for strategic sites. Establish a working group who will use the above information (derived from the audit) to take forward work on Design Codes. Initial steps to review content/ thematic coverage of existing Design Codes, and explore options for a future pilot project and engagement on what has /	Design Codes are to be 'provably locally popular' and it is unclear at present whether the Government intends to prescribe a process for (e.g. through neighbourhood planning). We will await/ monitor legislative reform before commencing with preparation of Design Codes for a new style local plan. Once we have clarity around the content of the 'National Model Design Code' and
	has not worked well in existing design codes. Explore possible pilot project to update existing Village	national development management policy, WCC will prepare a template Design Code for Growth/ Renewal/ Protected Areas.

	Design Statement(s) which could in future form the basis of a Design Code for a new style local plan.	WCC will explore options for production of Design Codes collaboratively with the local community/stakeholders. Whilst it is not known at this stage the exact range of information that Local Design Codes will need to include they might cover points such protecting heritage, townscape and visual amenity, ecology, ensuring, open space and community facilities are delivered, alongside any necessary flood mitigation etc (if these are not covered by national or local policy). WCC will need to explore ways of facilitating development of Design Codes by stakeholders which address all necessary issues.
Getting 'Digital Ready'	Review evidence base and other Council documents, to extract and compile GIS data and start preparing an interactive map displaying data on: SHELAA sites (which may form the basis of Growth Areas), Areas which benefit from existing 'Village Design	Local Plan development management policies will not be drafted until there is clarity from Government around national development management policy (in terms of its nature and content) in order to avoid abortive expense/ effort. Explore the extent to which we can map development locations where CIL funds are generated and also those locations where funds are invested back into local projects.

	Statements' and 'Conservation Area Appraisals' which could form the basis of a Design Code; and Designated Sites Green infrastructure networks/ routes		
	Undertake initial research on 'Prop-Tech' suppliers and services used by other local authorities which could be contacted. Work with other local authorities across Hampshire to see if there is any consensus around engagement with any specific Prop-Tech supplier.		
	Develop a new website as the vehicle for digital engagement on the emerging local plan. Interactive Map with GIS data will feature on the new local plan website. Consider issues of data ethics and principles for ethical use of data which is made available by WCC on its planning databases		
Skills and Resourcing	Undertake an audit of existing skills and resourcing within WCC particularly with respect to design, master-planning, digital and geospatial mapping capabilities.	Consider appointment of Chief Officer for Design and Place Making or how this role could be incorporated into an existing role.	WCC will undertake training, both internally and externally, to support the delivery of Design Codes. (Await production of Government's Skills Strategy before proceeding)

	Investigate options for investing in GIS training internally.	
	Explore options for additional Future 2050 Funding for improving management of historic resources in the district. This could assist with building up digital data for inclusion of new style local plan.	
Process – Refining this Action Plan	Seek a meeting with MHCLG/ Chief Planning Officer regarding timings of new legislation/ policy and how this impacts our local plan preparation process.	Further Sustainability Appraisal (SA) may be undertaken once Strategic Options are developed (prior to consultation) – depending upon whether or not the
	Put WCC forward as a pilot authority for the new scheme, so that we can officially pivot towards production of a new style Local Plan in the short term rather than awaiting enactment of reforms.	requirement for SA has been abolished at that point in time.

APPENDIX: Analysis of Implications of 'Planning for the Future White Paper' for WCC Local Plan Preparation Process

			WINCHESTER CITY COUNCIL'S PROPOSED ACTION (LOCAL PLAN)		
PROPOSAL NO. (Planning for the Future	SUMMARY	KEY DETAILS	IMPLICATIONS FOR WCC NEW LOCAL PLAN PROCESS	WCC ACTIONS Green = short term actions	OUTSTANDING INFORMATION REQUIREMENTS
White Paper)				Red = longer term (9 months +)	
	Planning For Development			,	
	ROACH TO PLAN-MAKING				
Proposal 1 (pg24 Planning for the Future White Paper)	Local plans to be simplified – main focus will be identification of three types of land: Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.	Growth areas: suitable for substantial development, and where outline approval for development would be automatically secured for forms and types of development specified in the Plan; eg urban extension sites, new settlements, former industrial sites/ regeneration sites (para 2.8) LPAs to also identify sub-areas in their Growth areas for self and custom-build homes, so that more people can build their own homes. Renewal areas: suitable for some development – existing built areas where smaller scale development is appropriate. Eg: gentle densification/ infill of residential areas, development in town centres, and development in rural areas that is not annotated as Growth or Protected areas, such as small	All land in the district (outside SDNP) must be classified for growth, renewal or protection - based upon considerations of sustainable development which will be the test new style Local Plans will need to meet upon examination. Sites selected as options for accommodating development must be 'sustainable'. Consideration will also need to be given to the viability of potential Growth Areas. Whilst Sustainability Appraisal of plans may be abolished (see below) there may still be a need for strategic environmental assessment to underpin classification of land for growth/ renewal/ protection. Therefore, work undertaken to date in connection with Sustainability Appraisal is expected to be useful evidence of options	Continue with SHELAA Assessment, with the expectation that SHELAA sites will form the basis of 'Growth Areas' under a new style Local Plan. Develop criteria for assessment of SHELAA sites — including consideration of the extent to which each site amounts to 'sustainable development'.	National Policy to be updated to define the term 'substantial growth' (which is to be allowed in Growth Areas). It will also define some areas as 'protected areas' at a national level and will define the term 'sustainable development'. There remains significant uncertainty as to the amount of housing to be planned for. This prevents selection of potential options for Growth Areas / Renewal Areas until we have clarification on required capacity of sites. We can, however, continue with assessment of SHELAA sites (as indicated in the actions). New primary and secondary legislation will be required, to give effect

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sites within or on the edge of	meeting the 'sustainable		to these changes to the
villages.	development' test under the		the plan making process
Protected areas where	new system. There may be a		(para 2.6). It is assumed
development is restricted due to	need for some additional		that legislation will be
environmental and/ or cultural	assessment of environmental		introduced in early 2021
characteristics of the site/ area.	issues within growth areas (for		and passed by end of 2021
More stringent development	example, the White Paper		(based on statements in
control required to ensure	suggests high flood risk may		the White Paper – see final
sustainability.	prevent an area being included		row of this table).
Eg: Green Belt, AONB,	in a Growth Area unless the		
Conservation Areas, Local Wildlife	risk can be mitigated (para 2.8)		
Sites, areas of significant flood	- suggesting the need for		
risk and important areas of green	Flood Risk Assessment and		
space. Open countryside outside	design of high level mitigation		
of growth/ renewal areas. May	options at classification / draft	Compile GIS data and start	
include residential gardens.	plan stage. It is unclear at this	preparing an interactive map	
	stage who would take	displaying data on:	
	responsibility for this		
	assessment though the White	SHELAA sites (which may	
	Paper suggests those who gain	form the basis of Growth	
	from development should	Areas),	
	bear the cost. There may be a	"	
	need, therefore, to request	Settlement Boundaries	
	additional technical detail in	(which may form the basis of	
	relation to SHELAA sites – to	Renewal Areas)	
	ensure any such issues can be		
	mitigated and to justify	Areas which benefit from	
	inclusion of sites within	existing 'Village Design	
	Growth/ Renewal Areas. The	Statements' and	
	mitigation recommended in	'Conservation Area	
	such assessment would then	Appraisals' which could form	
	be included in the relevant	the basis of a Design Code;	
	Design Code.	and	
		Designated Sites (of the kind	
		listed in column 2) (which	
		may form the basis of	
		Conservation Areas.	
		Conservation Areas.	
	1		1

		WCC had intended to consult on Strategic Issues and Options in Q4 2020. Due to uncertainty around housing targets, this consultation will be re-focused, to consider the new local plans' vision, objectives and the key issues/ priorities for action (referred to in these documents as consultation on 'Strategic Issues and Priorities').	
		Strategic options for accommodating development will be consulted on a later date once there is clarity about the quantum of development to be planned for.	Requires Government decision on housing targets. Timing unclear at present.
		As part of the consultation to be conducted on Strategic Issues and Priorities engage with those involved in SHELAA sites around the extent of technical/ environmental information which will be expected, to support any decision to include a SHELAA site in the	
		draft local plan or in a draft Growth Area under a new style plan. Viability information may also be required at this stage, to provide assurances as to deliverability of development in these sites/ areas.	

	T	T	Т		
				Explore issues around	
				designation of a green belt.	
				Explore possibility of	
				undertaking an 'Urban	
				Capacity Assessment' which	
				reviews capacity to densify	
				existing settlement boundary	
				– to underpin development of	
				Strategic Options once	
				housing target has been	
				clarified.	
Proposal 2	Development management policies		NPPF to be updated to contain	Local plan policy will not be	NPPF to be updated to set
(pg 25)	established at national scale and an		national DM policies,	drafted until there is clarity	out national development
	altered role for Local Plans.		applicable to all development.	from national Government	management policies.
			There is a lack of clarity at	around the nature and	Timing unclear at present.
			present, of the scope of	content of national	
			discretion over local	development management	
			development management	policy, to avoid abortive	
			policy.	expense/ effort.	
Proposal 3	Local Plans should be subject to a		At the moment further details	Development of criteria for	
(pg 26)	single statutory "sustainable		are awaited from the	assessment of SHELAA sites –	
	development" test, replacing the		government on what the new	including consideration of the	
	existing tests of soundness.		single test of sustainability will	extent to which each site	
	_		be and what information you	amounts to 'sustainable	
			will need to undertake in order	development'.	
			to meet this requirement.	·	
			·		
			Some of the evidence required		
			for current local plan process	Design Codes prepared for a	
			may no longer be required for	new style local plan will need	
			a new style local plan. WCC	to regulate social,	
			have already commissioned a	environmental and economic	
			number of evidence base	issues which influence the	
			reports, some of which will be	delivery of sustainable	
			useful when preparing design	development, not simply	
			codes. However, evidence	issues of 'architectural	
			around housing needs may	design'. For example, Design	
			prove partially redundant.	Codes will need to stipulate	
			prove partially redundant.	codes will fleed to stipulate	

			Evidence around retail/economic issues may need updating due to the Covid pandemic.	rules for protecting heritage, townscape and visual amenity, ecology, ensuring, open space and community facilities are delivered, alongside any necessary flood mitigation etc. WCC Strategic policy team will work towards producing a template Design Code (discussed further below).	
Proposal 4 (pg 27)	A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.	New housing targets will be set nationally and will be binding upon LPAs. (Covered by separate consultation and it is expected that this change will come into force in advance of the other planning reforms outlined in this table. It is therefore assumed that the emerging local plan will be based upon a revised housing target, but with some possible adjustment for local constraints). Will factor in land constraints such as Green Belt. Aim is to deliver 300,000 homes annually.	The number of housing units to be accommodated in WCC could rise from 692 per annum to 1024 per annum under this proposed change. WCC would prefer not to consult on options for accommodating housing in the local plan until we have clarity over the quantum of development to be accommodated, so that a robust assessment of options can be undertaken first.	WCC had intended to consult on Strategic Issues and Options in Q4 2020. Due to uncertainty around housing targets, this consultation will be re-focused, to consider the new local plans' vision, objectives and the key issues/priorities for action. WCC will seek to engage a wide range of participants at this high level stage, with enhanced emphasis upon digital engagement, consistent with the aims of the recent White Paper. A new website will be developed as the vehicle for engagement on the emerging local plan.	Unclear which constraints will be factored into standard methodology and whether WCC number will be reduced due to 40% of land being within SDNP.
				Strategic options for accommodating development will be consulted on a later date once there is clarity about the quantum of development to be planned for.	Requires Government decision on housing targets. Timing unclear at present.

A streamline	streamlined development management process with automatic planning permission for schemes in line with plans				
Proposal 5 (pg 29)	Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.	There will be a statutory presumption in favour of development being granted for uses specified as being suitable in each area.	There is an expectation that design codes will be produced at local level, but they will become the key means of controlling the outcomes of development and must therefore cover all topics required to deliver sustainable development (social, economic, environmental) to ensure placemaking is of a high standard.	WCC will commence consideration of options for production of Design Codes collaboratively with the community. Options will include a potential pilot project with one village, to update an existing Village Design Statement. This project could form the basis of a new template Design Code to be developed as a result of a collaborative process with the community, which enhances understanding of the support and training required to deliver local plan Design Codes.	National Model Design Code to be issued – monitor.
				WCC will undertake training, both internally and externally, to support the delivery of Design Codes.	Requires production of Government's National Model Design Code; and decision around options for accommodating growth (which depends upon clarification of housing targets by the Government)
Proposal 6 (pg 31)	Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology	More certain due to clear rules/ design codes; faster due to use of digital technology; and also faster due to 'Streamlined consultation at planning application stage' (Para 1.17, page 17) There is an expectation that LPAs will use digital tools to support a new civic engagement process for local plans and decision-making,	We need to ensure the public have every opportunity to engage in plan preparation stage, as the work being undertaken now will underpin development outcomes in future, with possibly reduced consultation at that stage. We do not therefore want to consult the public on strategic options which very quickly	Update Local Development Scheme as/when necessary to communicate changes in local plan preparation process/ timeframes. A new website will be developed as the vehicle for digital engagement on the	

		making it easier for people to	become out of date due to	emerging local plan.	
		understand what is being	changes in housing targets.	WCC had intended to consult	
		proposed and its likely impact on		on Strategic Issues and	
		them through visualisations and		Options in Q4 2020. Due to	
		other digital approaches. People		uncertainty around housing	
		should be able to engage via		targets, this consultation will	
		social networks and via their		be re-focused, to consider the	
		phones. (Para 1.17, page 17)		new local plans' vision,	
				objectives and the key issues/	
				priorities for action. WCC will	
				seek to engage a wide range	
				of participants at this high	
				level stage, with enhanced	
				emphasis upon digital	
				engagement, consistent with	
				the aims of the recent White	
				Paper. A new website will be	
				developed as the vehicle for	
				engagement on the emerging	
				local plan.	
				Strategic options for	Requires Government
				accommodating development	decision on housing
				will be consulted on at a later	targets. Timing unclear at
				date once there is clarity	present.
				about the quantum of	•
				development to be planned	
				for and once there is clarity	
				on the revised local plan	
				preparation process to be	
				brought forward via these	
				reform proposals.	
	active, web-based map standard for plan	-			
Proposal 7	Local Plans should be visual and map-	Plans should be significantly	Current work on evidence	Review available GIS data	Require sight of the new
(pg 33)	based, standardised, based on the	shorter in length, and limited to	base to underpin Local Plan	sets, begin to compile a	'template local plan' to be
	latest digital technology, and	no more than setting out site or	may prove abortive. Seek to	comprehensive interactive	produced by MHCLG
	supported by a new template.	area-specific parameters and	minimise unnecessary expense	GIS map with all planning/	(timing unclear).
		opportunities.	where possible.	policy data.	
					Require clarity over the
		Digitisation will enable a strategic			'latest digital technology'

		national map of planning to be			expected to be utilised.
		created (para 2.5)			
A STREAML	INED, MORE ENGAGING PLAN-MAKING P	ROCESS			
Proposal 8 (pg 34)	Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.	Statutory timetable will be no more than 30 months in total (42 months for those with a recently adopted plan), for key stages of the process, and there will be sanctions for those who fail to do so	This timetable will be challenging to achieve. WCC will need to prepare design codes for all development in the district, which will determine the nature of development which comes forward. LPAs will be expected to engage more meaningfully with the community and stakeholders in preparation of new style local plans and to also develop/ adopt new technology in doing so, which will require development of new skills.	Review available GIS data sets, begin to compile a comprehensive interactive GIS map with all planning/policy data. Interactive Map should be ready for inclusion in new local website, by mid February 2021 Continue with SHELAA Assessment, with the expectation that SHELAA sites will form the basis of 'Growth Areas' under a new style Local Plan. Development of criteria for assessment of SHELAA sites – including consideration of the extent to which each site amounts to 'sustainable development'.	
				WCC will commence consideration of options for production of Design Codes collaboratively with the community. Options will include a potential pilot project with one village, to update an existing Village Design Statement. This project could form the basis of a new template Design Code to be developed as a result of a collaborative	

Proposal 9 (pg 36)	Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools		process with the community, which enhances understanding of the support and training required to deliver local plan Design Codes.	
	P THE DELIVERY OF DEVELOPMENT			T. 0
Proposal 10 (pg 37)	A stronger emphasis on build out through planning (make it clear in the revised National Planning Policy Framework that the masterplans and design codes for sites prepared for substantial development (discussed under Pillar Two) should seek to include a variety of development types by different builders which allow more phases to come forward together. We will explore further options to support faster build out as we develop our proposals for the new planning system.)	Growth Areas to include a variety of development types by different builders, which will allow more phases to come forward together.	Consider how the assessment of SHELAA sites could potentially consider potential of sites to include a variety of development types.	The Government are considering other options for influencing housing build out rates, which may result in additional measures which need to be accounted for.
Pillar 2				
	beautiful and sustainable places			
Proposal 11 (pg 39)	To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.	There is an expectation that design codes will be produced at local level, but they will become the key means of controlling the outcomes of development and must therefore cover all topics required to deliver sustainable development (social, economic, environmental) to	(As above – Proposal 5)	

			ensure placemaking is of a high standard.		
Proposal 12 (pg 40)	To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.	Aim is to ensure there is capacity and capability locally to raise design standards and the quality of development. New Design Body will be set up to support delivery of design codes, and give permanence to the campaigning work of the Building Better, Building Beautiful Commission and the life of its cochairman the late Sir Roger Scruton.	WCC needs to consider the resourcing implications of these changes. Design Codes will become the key means of controlling the impact of new development and should contain all information which would usually be considered/conditioned on outline planning applications. Therefore, design codes will need to detail environmental mitigation and measures for protection of heritage/ visual amenity, alongside issues of urban design and placemaking.	Consider appointment of Chief Officer for Design and Place Making. See action points above regarding development of	Clarification required on definition of 'provably locally popular' and the means by which this will be proven. Primary legislation may provide such clarity – timing unclear (anticipate mid 2021?)
Proposal 13 (pg 41)	To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.			template Design Codes.	
A FAST-TRAC	CK FOR BEAUTY				
Proposal 14 (pg 42)	We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.	Make it easier for those who want to build beautifully through the introduction of a fast-track for beauty through changes to national policy and legislation, to automatically permit proposals for high quality developments where they reflect local character and preferences.	Design Code to define local character of areas and also record preferences of local people, in terms of what is 'beautiful'.	Design Code template to include a definition of local character, to be prepared by the relevant local community in collaboration with WCC.	Clarification required – how varied definitions of 'beauty' are to be reconciled? Precise legislative and policy amendments will be reviewed to determine process for reaching agreement on these points.
EFFECTIVE S ENVIRONME	TEWARDSHIP AND ENHANCEMENT OF OU ENT	JR NATURAL AND HISTORIC			

Proposal 15 (pg 44)	We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.				Amendment to NPPF – detail unclear at present. Unclear whether LPAs will be able to set more ambitious climate change targets than those set nationally? (this point has been raised by WCC in its consultation response)
Proposal 16 (pg 44)	We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.	Sustainability Appraisal to be abolished.	As Design Codes will cover all matters necessary to ensure acceptable environmental outcomes, there may still be a need for environmental impact assessment which identified necessary mitigation. Such mitigation should be included in Design Codes for Growth/ Renewal Areas. WCC has already commissioned Sustainability Appraisal / Integrated Impact Assessment already. This report will provide useful data for inclusion in the Interactive digital map (as to protected sites) and also assist in justifying classification of land for growth/ renewal/ protection in sustainable development terms (under the new system).	Further Sustainability Appraisal considered once Strategic Options are developed (prior to consultation) – depending upon whether or not requirement has been abolished at that point in time.	Strategic Options can only be developed/ consulted upon once housing targets are clarified. The Government has suggested there may be a further consultation in Q4 2020 on streamlined environmental assessment.
			new systems.	As part of the consultation to be conducted on Strategic Issues and objectives, engage with those involved in SHELAA sites around the	

			T	outout of tooksisel/	
				extent of technical/	
				environmental information	
				which will be expected, to	
				support any decision to	
				include a SHELAA site in the	
				draft local plan or in a draft	
				Growth Area under a new	
				style plan.	
Proposal	Conserving and enhancing our historic	Protect our historic buildings and	WCC have been compiling and	Explore options for additional	
17 (pg 44)	buildings and areas in the 21st century	areas while ensuring the consent	updating GIS data on heritage	Future 2050 Funding for	
-, (68)	and areas in the 22st sentary	framework is fit for the 21st	via Winchester Future 2050	improving management of	
		century.	which will provide a head-start	historic resources in the	
		,	on requirements under the	district. This could assist with	
			new system. Methodology has	building up digital data for	
			been developed and initial	inclusion of new style local	
			project at Hursley	plan.	
			commencing shortly.		
Proposal	To complement our planning reforms,				Amendment required to
18 (pg 45)	we will facilitate ambitious				NPPF – detail unclear at
	improvements in the energy efficiency				present.
	standards for buildings to help deliver				
	our world-leading commitment to net-				Unclear whether LPAs will
	zero by 2050.				be able to set more
					ambitious climate change
					targets than those set
					nationally.
	 Planning for infrastructure and connect 	ed places			
	ATED INFRASTRUCTURE LEVY				
Proposal	The Community Infrastructure Levy	Aim = to capture a greater share	How do we ensure sites	When assessing SHELAA	Clarity required on timing
19 (pg 48)	should be reformed to be charged as a	of the uplift in land value.	promoted in the SHELAA are	assessment and selecting	of new Infrastructure Levy.
	fixed proportion of the development	Suggests the need for viability	ultimately deliverable if there	options for accommodating	WCC CIL Schedule will not
	value above a threshold, with a	appraisal will be avoided. Clarity	is no mechanism for viability	development in the district, it	be revised pending receipt
	mandatory nationally-set rate or rates	over infrastructure costs will	appraisal? Is there a risk that	may be necessary to include	of confirmation of the
	and the current system of planning	enable these to be factored into	current SHELAA sites could be	fall back sites, should viability	Government's approach to
	obligations abolished.	value of sites during purchase.	rendered unviable once the	issues prevent development	the new infrastructure tax/
		(Para 1.19, page 18)	new Infrastructure Levy is	of some of the preferred	levy.
			introduced, rendering our plan	options.	
			deficient?		

			Update CIL Schedule or not?		
Proposal 20 (pg 51)	The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights				
Proposal 21 (pg 51)	The reformed Infrastructure Levy should deliver affordable housing provision	We will ensure that the new Infrastructure Levy allows local planning authorities to secure more on-site housing provision. (Para 1.19, page 18)	Should design codes for Growth/ Renewal Areas set out expectation regarding AH provision?		
Proposal 22 (pg 53)	More freedom could be given to local authorities over how they spend the Infrastructure Levy	Local authorities will have the flexibility to use this funding to support both existing communities as well as new communities. (Para 1.19, page 18)	There is potential for innovative approaches to the allocation of CIL funds at a local level (eg crowdfunding model to allow the public to vote on local projects to receive funding.	GIS mapping should capture the development locations where CIL funds are generated and also those locations where funds are invested back into the community, so that there is transparency around communities benefiting from allowing development in their local area (utilising data in Infrastructure Funding Statement)	
Proposal 23 (pg 57)	As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. In doing so, we propose this strategy will be developed including the following key elements Workforce planning and skills development, including training, should be principally for the local government sector to lead on, working closely with Government, statutory consultees, planning consultancies and universities.	The Resources and Skills Strategy is aimed at, amongst other things, ensuring "local planning authorities are equipped to create great communities through world-class civic engagement and proactive planmaking". Yet will be for the local government sector to lead on workforce planning and skills development.	GIS resource within WCC is limited at present. Limited staffing within Strategic Planning to deliver new style plans without additional support. Development Management will be required to twin track services – providing current levels of development management support alongside front loaded plan making.	Undertake an audit of skills and resourcing within WCC particularly with respect to design, master-planning, digital and geospatial mapping capabilities. Invest in GIS training internally and existing Prop-Tech suppliers/ services	Require detail of Government's proposed comprehensive resources and skills strategy for the planning sector.

Stronger enf	Reform should be accompanied by a significant enhancement in digital and geospatial capability and capacity across the planning sector to support high-quality new digital Local Plans and digitally enabled decision-making			
Proposal	We will seek to strengthen			Clarity required on timing
24 (pg 58)	enforcement powers and sanctions			of introduction of new powers/ sanctions.
Timeframes	for reform			powersy surrections.
	The consultation runs for 12 weeks from 6 August 2020 (to 28 October 2020). Subject to responses to this consultation, we will consider the arrangements for implementing these changes to minimise disruption to existing plans and development proposals and ensure a smooth transition. This includes making sure that recently approved plans, existing permissions and any associated planning obligations can continue to be implemented as intended; and that there are clear transitional arrangements for bringing forward new plans and development proposals as the new system begins to be implemented. Nevertheless, we do want to make rapid progress toward this new planning system. (para 5.2-5.3) Our proposals for Local Plan reform, changes to developer contributions	The Government appears to anticipate new legislation would come into force at the end of 2021. LPAs would then have 30 months to prepare a new digital local plan, or 42 months if they have a recently adopted Local Plan. WCC will not have a 'recently adopted' Local at that point in time as our current timetable targets adoption in Sept 2023. We will therefore need, in approximately Jan 2022, to pivot existing work streams toward production of a new style digital plan, for completion within 30 months (Jan 2022 to June 2024). We need to pivot workstreams on our current Local Plan process, to ensure they set us up well for production of a new style Local Plan once reforms come into force. The	Follow initial actions (green) out in this Action Plan for the period up to March 2021. Reassess workstreams as we receive clarity on the issues set out in the final column of this table. Key steps required are: 1. Confirmation of housing targets to be accommodated and 2. Timing of reforms relative to our currently published LDS. Seek a meeting with MHCLG/ Chief Planning Officer regarding timings and process. Put WCC forward as a pilot authority for the new scheme, so that we can officially pivot towards production of a new style	Monitor announcements regarding timing of reforms.

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and development management.	20	Level Dien Seitle elevations
and development management would	30 month timeframe will be	Local Plan in the short term
require primary legislation followed by	challenging to achieve, so	rather than awaiting
secondary legislation. The proposals	advance work on compiling	enactment of reforms.
allow 30 months for new Local Plans	digital data and public	
to be in place so a new planning	engagement around issues	
framework [SIC], so we would expect	and objectives will place us in	
new Local Plans to be in place by the	a good position to make a	
end of the Parliament.	swift start.	
	There are a number of issues	
	which impact our ability to	
	move forward with the current	
	local plan process – in	
	particular, lack of clarity	
	around the number of housing	
	units which must be delivered	
	over the plan period. It is	
	undesirable to proceed to	
	consult on Strategic Options	
	for accommodating housing	
	when the housing target is	
	unknown. We will, however	
	undertake a high level	
	consultation on Strategic	
	Priorities and Issues in Feb/	
	Mar 2021.	