

Winchester City Council Local Plan

Draft Action Plan

13 November 2020



Introduction

1. 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	<p>A new website will be developed as the primary vehicle for engagement on the emerging local plan. February 2021.</p> <p>Maintain website to hold Council papers and responses to Government consultations, alongside details of feedback received on the draft plan.</p>		
	<p>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.</p>		
	<p>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-</p>	<p>Await outcome of Government's consultation on methodology for setting housing targets. Detailed proposals for strategic options for accommodating development will be developed and consulted on once there is clarity about the quantum of development to be planned for.</p>	

	<p>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.</p> <p>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.</p>	<p>If reforms have come into force by this point in time, consultation will focus upon land to be included in growth/ renewal/protected areas.</p>	
	<p>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.</p>	<p>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.</p>	
	<p>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.</p>		
	<p>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.</p>		
	<p>Update Local Development Scheme (the timetable for</p>		

	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	<p>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.</p> <p>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.</p> <p>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.</p>	Strategic options for accommodating development will be developed and consulted on once there is clarity about the quantum of development to be planned for. Await outcome of Government's consultation on methodology for setting housing targets before consulting on the different ways to meeting the housing target.	
	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	<p>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.</p> <p>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 / has not worked well in existing design codes.</p> <p>Explore possible pilot project to update existing Village</p>	<p>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.</p> <p>Once we have clarity around the content of the 'National Model Design Code' and national development management policy, WCC will prepare a template Design Code for Growth/ Renewal/ Protected Areas.</p>	

	<p>Design Statement(s) which could in future form the basis of a Design Code for a new style local plan.</p>	<p>WCC will explore options for production of Design Codes collaboratively with the local community/stakeholders.</p> <p>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.</p> <p>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.</p>
<p>Getting ‘Digital Ready’</p>	<p>Review evidence base and other Council documents, to extract and compile GIS data and start preparing an interactive map displaying data on:</p> <p>SHELAA sites (which may form the basis of Growth Areas),</p> <p>Areas which benefit from existing ‘Village Design</p>	<p>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.</p>

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

	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	<p>Seek a meeting with MHCLG/ Chief Planning Officer regarding timings of new legislation/ policy and how this impacts our local plan preparation process.</p> <p>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.</p>	Further Sustainability Appraisal (SA) may be undertaken once Strategic Options are developed (prior to consultation) – depending upon whether or not the 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 White Paper)	SUMMARY	KEY DETAILS	IMPLICATIONS FOR WCC NEW LOCAL PLAN PROCESS	WCC ACTIONS Green = short term actions ((next 6 months) Amber = medium term (6-9 months) Red = longer term (9 months +)	OUTSTANDING INFORMATION REQUIREMENTS
Pillar One: Planning For Development					
A NEW APPROACH 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

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

				<p>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').</p>	
				<p>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.</p>	<p>Requires Government decision on housing targets. Timing unclear at present.</p>
				<p>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.</p>	

				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 (pg 25)	Development management policies established at national scale and an altered role for Local Plans.		NPPF to be updated to contain national DM policies, applicable to all development. There is a lack of clarity at present, of the scope of discretion over local development management policy.	Local plan policy will not be drafted until there is clarity from national Government around the nature and content of national development management policy, to avoid abortive expense/ effort.	NPPF to be updated to set out national development management policies. Timing unclear at present.
Proposal 3 (pg 26)	Local Plans should be subject to a single statutory "sustainable development" test, replacing the existing tests of soundness.		At the moment further details are awaited from the government on what the new single test of sustainability will be and what information you will need to undertake in order to meet this requirement. Some of the evidence required for current local plan process may no longer be required for a new style local plan. WCC have already commissioned a number of evidence base reports, some of which will be useful when preparing design codes. However, evidence around housing needs may prove partially redundant.	Development of criteria for assessment of SHELAA sites – including consideration of the extent to which each site amounts to 'sustainable development'. Design Codes prepared for a new style local plan will need to regulate social, environmental and economic issues which influence the delivery of sustainable development, not simply issues of 'architectural design'. For example, Design Codes will need 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 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)	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.	
		There is an expectation that LPAs will use digital tools to support a new civic engagement process for local plans and decision-making,		A new website will be developed as the vehicle for digital engagement on the	

		making it easier for people to understand what is being proposed and its likely impact on them through visualisations and other digital approaches. People should be able to engage via social networks and via their phones. (Para 1.17, page 17)	become out of date due to changes in housing targets.	emerging local plan. 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.	
				Strategic options for accommodating development will be consulted on at a later date once there is clarity 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.	Requires Government decision on housing targets. Timing unclear at present.
A new interactive, web-based map standard for planning documents					
Proposal 7 (pg 33)	Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.	Plans should be significantly shorter in length, and limited to no more than setting out site or area-specific parameters and opportunities. Digitisation will enable a strategic	Current work on evidence base to underpin Local Plan may prove abortive. Seek to minimise unnecessary expense where possible.	Review available GIS data sets, begin to compile a comprehensive interactive GIS map with all planning/policy data.	Require sight of the new 'template local plan' to be produced by MHCLG (timing unclear). Require clarity over the 'latest digital technology'

		national map of planning to be created (para 2.5)			expected to be utilised.
A STREAMLINED, MORE ENGAGING PLAN-MAKING PROCESS					
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.	<p>Review available GIS data sets, begin to compile a comprehensive interactive GIS map with all planning/ policy data.</p> <p>Interactive Map should be ready for inclusion in new local website, by mid February 2021</p> <p>Continue with SHELAA Assessment, with the expectation that SHELAA sites will form the basis of 'Growth Areas' under a new style Local Plan.</p> <p>Development of criteria for assessment of SHELAA sites – including consideration of the extent to which each site amounts to 'sustainable development'.</p> <p>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</p>	

				process with the community, which enhances understanding of the support and training required to deliver local plan Design Codes.	
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				
SPEEDING UP THE DELIVERY OF DEVELOPMENT					
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 Planning for beautiful and sustainable places					
CREATING FRAMEWORKS FOR QUALITY					
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 co-chairman 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.	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?)
				See action points above regarding development of template Design Codes.	
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.				
A FAST-TRACK 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 STEWARDSHIP AND ENHANCEMENT OF OUR NATURAL AND HISTORIC ENVIRONMENT					

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

			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 plan-making”. 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.

	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....				
Stronger enforcement					
Proposal 24 (pg 58)	We will seek to strengthen enforcement powers and sanctions				Clarity required on timing of introduction of new powers/ sanctions.
Timeframes for reform					
	<p>The consultation runs for 12 weeks from 6 August 2020 (to 28 October 2020).</p> <p>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)</p> <p>Our proposals for Local Plan reform, changes to developer contributions</p>		<p>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.</p> <p>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).</p> <p>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</p>	<p>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:</p> <ol style="list-style-type: none"> 1. Confirmation of housing targets to be accommodated and 2. Timing of reforms relative to our currently published LDS. <p>Seek a meeting with MHCLG/ Chief Planning Officer regarding timings and process.</p> <p>Put WCC forward as a pilot authority for the new scheme, so that we can officially pivot towards production of a new style</p>	Monitor announcements regarding timing of reforms.

	<p>and development management would require primary legislation followed by secondary legislation. The proposals allow 30 months for new Local Plans to be in place so a new planning framework [SIC], so we would expect new Local Plans to be in place by the end of the Parliament.</p>		<p>30 month timeframe will be challenging to achieve, so advance work on compiling digital data and public engagement around issues and objectives will place us in a good position to make a swift start.</p> <p>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.</p>	<p>Local Plan in the short term rather than awaiting enactment of reforms.</p>	
--	--	--	--	--	--