

REVIEW OF THE LOCAL PLAN 2015 AND WIDER PLANNING POLICY MATTERS

Committee: Full Council

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[U96]

1.0 **ISSUE**

1.1 To seek an agreed way forward for the East Cambridgeshire Local Plan.

2.0 **RECOMMENDATION(S)**

2.1 That Council:

- I. Endorses the formal Review of the Local Plan, and, consequently, agrees not to commence preparation of a new Local Plan at this stage;
- II. Agrees to undertake a further Review within 18 months, or earlier if evidence suggests it is prudent to do so;
- III. Approves the updated Local Development Scheme as presented at Appendix 3;
- IV. Endorses the work programme for the preparation of Supplementary Planning Documents over the coming 1-2 years;
- V. Welcomes the continued progress with Neighbourhood Plans across the district, and commits to continue supporting their production where reasonable and practical to do so.

3.0 **BACKGROUND/OPTIONS**

Introduction

- 3.1 The preparation of a new East Cambridgeshire Local Plan made good progress up to it being submitted for independent examination in February 2018. For reasons set out in more detail in your Council report of February 2019, the examination proceeded considerably slower than the guidance suggests it ought, was fraught with confusion and a lack of clarity from the Inspector, and ultimately resulted in a set of Inspector proposed modifications which were unacceptable to this Council. Council therefore decided to 'withdraw' the emerging Local Plan from its examination, and in effect end its preparation.
- 3.2 Consequently, instead of having a new Local Plan in place, the Council has reverted back to its 2015 adopted Local Plan for the purpose of decision making on planning application.

Action Required

- 3.3 It is a legal requirement for a Council to have a Local Plan in place, and to keep it up to date. However, there is no fixed prescribed periods when a new Local Plan must be prepared, or what a maximum 'gap' between adopted Plans can exist.
- 3.4 That said, there is some legislation to be adhered to.
- 3.5 First, the 2017 Neighbourhood Planning Act (which incidentally was far more wide ranging than just Neighbourhood Planning) introduced within section 17 of the Planning and Compulsory Purchase Act 2004 new subsections, two of which are of most relevance to this report:
- “(6A) The Secretary of State may by regulations make provision requiring a local planning authority to review a local development document at such times as may be prescribed.*
- (6B) If regulations under subsection (6A) require a local planning authority to review a local development document—*
- (a) they must consider whether to revise the document following each review, and*
- (b) if they decide not to do so, they must publish their reasons for considering that no revisions are necessary.”*
- 3.6 A 'local development document' referred above includes a Local Plan, as well as other planning policy type documents.
- 3.7 The above legislation was subsequently added to by Regulations in 2017 which established that a Local Plan 'review' at least every five years is now a legal requirement, by virtue of Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):
- “10A.—(1) A local planning authority must review a local development document [and] in respect of a local plan, the review must be completed every five years, starting from the date of adoption of the local plan”*
- 3.8 The above legislative requirement does not mean a new Local Plan must be **adopted** every five years nor does it mean preparation of a new Local Plan must be **commenced**. Rather, as a minimum, a **review** must take place.
- 3.9 It is fair to say that this terminology, and subtle difference between the three words, has caused some considerable confusion, especially to, for example, Parish Councils or others interested in plan-making.
- 3.10 The National Planning Policy Framework (NPPF) February 2019 and the supporting National Planning Practice Guidance (NPPG) (live guidance) starts to clarify what is expected by a 'review'. The NPPF states as follows:
- “33. Policies in local plans...should be reviewed to assess whether they need updating at least once every five years, and should then be*

updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy....”

3.11 The NPPG provides greater detail on what is expected, from para Paragraph: 062 Reference ID: 61-062-20190315, and extracts are given in the following commentary.

3.12 At para 064, it states that the “*review process is a method to ensure that a plan and the policies within remains effective*”.

3.13 Para 065 sets out some of the matters a Council could consider as part of its ‘review’ process.

“The authority can consider information such as (but not exclusively):

- conformity with national planning policy;*
- changes to local circumstances; such as a change in Local Housing Need;*
- their Housing Delivery Test performance;*
- whether the authority can demonstrate a 5 year supply of deliverable sites for housing;*
- whether issues have arisen that may impact on the deliverability of key site allocations;*
- their appeals performance;*
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;*
- the impact of changes to higher tier plans;*
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;*
- significant economic changes that may impact on viability.; and*
- whether any new social, environmental or economic priorities may have arisen.”*

3.14 Para 068 goes on to say:

“A local planning authority may need to gather new evidence to inform their review. Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies.”

3.15 Whilst para 070 reconfirms the legislative position:

“If a local planning authority decides that they do not need to update their policies, they must publish the reasons for this decision within 5 years of the adoption date of the plan.”

3.16 In essence, a ‘review’ is a process whereby a conscious (and public) decision is reached by a Council as to whether or not a Local Plan is in need of updating,

either in whole or part. Once such a review is complete, the Council will need to decide which of the following two options apply:

- (i) The existing adopted Local Plan (2015 version, in our case) does need updating (and therefore the Council commits to preparing a new Local Plan); or
- (ii) The existing adopted Local Plan does not need updating, and (as legally required) issues a statement confirming as much.

3.17 Ultimately, the decision of the Council is then binding. There is no legal mechanism to challenge the outcome of the review, other than in an extreme case the Secretary of State has the ability to commence a new Local Plan for an area, even if the local area had decided not to do so.

3.18 Once a review has been undertaken, if the subsequent decision is to not commence a new Local Plan, then it is not clear what happens thereafter (other than the issuing of a Statement); there is no legislation or national policy setting out that a further review must take place at some point in the future. Nevertheless, officers would recommend under this scenario that further reviews are undertaken approximately every 12-18 months, and a decision communicated each time. Such reviews would cease to take place once the decision has been taken to formally commence a new Local Plan.

ECDC Review and decision

3.19 A review, and the decision reached, must be completed by 21 April 2020, this being the 5th anniversary of the adopted 2015 East Cambridgeshire Local Plan. However, officers believe a slightly early review would be beneficial, rather than waiting until 2020, hence the presentation of this agenda item today.

3.20 Officers have accordingly undertaken a draft review in accordance with NPPG guidance, and set this out at Appendix 1.

Determining whether or not a new Local Plan should be commenced

3.21 The review at Appendix 1 provides a mixed picture as to whether or not a new Local Plan should be commenced. It is certainly not clear-cut that a new Local Plan should, or should not, be commenced.

3.22 In addition to the review at Appendix 1 prepared in line with national guidance, what national guidance does not make reference to is the consideration of cost in preparing a new Local Plan, nor the risk that, even if a new Local Plan is commenced preparation, that an adopted Local Plan will actually be achieved.

3.23 The cost of preparing a new Local Plan is significant (and takes around three years to complete), and comprises three main financial elements:

- (i) **Staff costs:** the Council currently operate on approximately 1FTE planning policy basis, delivered via an SLA arrangement with Peterborough City Council (the 1FTE utilises two part time 'core' officers

covering day to day matters, plus calls upon additional occasional specialist officers to meet specific demands, such as neighbourhood planning advice to parish councils and ecology advice sought by the development management service). If a new Local Plan was to be prepared, it would likely be necessary to boost that resource to 3FTE, either via recruiting directly or increasing the SLA. The total cost of this additional 2FTE (taking account of on-costs such as NI and pension etc) would likely be in the region of £100-150k pa, for 3 years. Total £300-450k.

- (ii) **Evidence base costs:** preparing a Local Plan requires considerable evidence material to be prepared. Whilst much of this can be done in-house (i.e. covered by the 3FTE staff), some elements cannot. These are the technical evidence base reports such as traffic modelling, flood and water resource modelling, and viability assessments. It is hard to be certain on what these costs would amount to, but as an estimate £100-200k would need to be set aside, with a risk of a greater sum, over the three year period.
- (iii) **Inspector and Examination costs:** The Council must pay for an Inspector, a Programme Officer and any incidental costs associated with the examination of the Local Plan. These costs occur in year 3 only, but are likely to be in the region of £100k.

3.24 As can be seen, therefore, deciding to prepare a new Local Plan will likely require a minimum budget of £500k to be found, spread over a three year period, with the risk that such a budget could increase (if, for example, additional evidence is required, or delays to preparing the Plan occur).

3.25 Overall, taking account the outcome of the review at Appendix 1 together with the costs described above, it is recommended that the outcome of the process is to **not commence a new Local Plan at the present time**. If Members agree such a position, then attached at Appendix 2 is a draft official statement setting out such reasoning, which will need to be published.

Local Development Scheme

3.26 It is a statutory requirement to publish, and keep up to date, a 'Local Development Scheme' (LDS). An LDS sets out the timetable for preparing a Local Plan. It is important Members are aware that it is not lawful for a Council to commence preparing a new Local Plan without first publishing an LDS saying it will do so.

3.27 The most recent LDS for East Cambridgeshire was adopted by Full Council on 5 October 2017, and, in short, that set out the forecast timetable for the Local Plan as was being prepared at the time. It forecast that the new Local Plan would be adopted in October 2018. Of course, events have not folded out as anticipated, and as such the presently published LDS is now clearly out of date.

3.28 A new LDS is therefore needed to be published, the content of which will be determined by the decision as to whether or not to commence a new Local Plan.

3.29 Accordingly, at Appendix 3 is a draft LDS recommended for approval, and prepared on the basis that a new Local Plan is not to be commenced in the immediate future. If Council determines today to commence a new Local Plan, then the LDS at Appendix 3 should not be approved as presented. Instead, delegation could be given to Officers to publish an LDS similar to that at Appendix 3, but with an appropriate timetable for preparing a new Local Plan included within it, which in short would seek an adopted new Local Plan sometime in 2022.

Other Planning Policy Matters – work programme

3.30 In addition to a decision on whether or not to commence preparing a new Local Plan (and the associated decision on an updated LDS), officers are recommending that a series of Supplementary Planning Documents (SPDs) are prepared over the next 1-2 years.

3.31 The NPPF defines an SPD as follows:

*“**Supplementary planning documents:** Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”*

3.32 ECDC current has a number of adopted SPDs. Some of these are policy thematic based (e.g. Community-led Development SPD), some are site specific (e.g. Bell Road, Bottisham Masterplan) and one is about how we will seek Developer Contributions. Full details are available here:

<https://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents>

3.33 Officers recommend that the following new or updated SPDs are prepared, with an approximate set of dates for their preparation. These SPDs can be prepared without additional financial resource, and can be completed utilising the present 1FTE planning policy resource identified earlier.

- **Self and Custom Build SPD:** this short SPD will set out greater detail on what the Council expects from development proposals which fall under this type of development, and the relationship to CIL liabilities (Self and Custom Build homes being exempt from CIL, under national legislation). Draft for consultation this winter; version ready for adoption by end of 2020.
- **Natural Environment SPD:** this SPD will, amongst other matters, set out advice and detailed policy requirements relating to the natural environment, tackling issues such as: ‘net gain’ in biodiversity via development proposals; technical advice in terms of discharging Habitat Regulation Assessments (HRA) obligations, especially in relation to swan and goose foraging in

designated protection zones around the Ouse Washes; and setting out the Council's position in relation to the recently adopted Local Nature Partnership vision to 'double land for nature' by 2050 across Cambridgeshire (a vision also endorsed by the Combined Authority in July 2019). Draft for consultation by early 2020; version ready for adoption by early 2021.

- **Developer Contributions SPD:** this will be an updated version of our current SPD, bringing up to date guidance and policy on matters such as affordable housing, education and open space contributions (though Members should note that an SPD cannot fundamentally amend or contradict policy as set out in the adopted Local Plan: it can only provide additional guidance or detailed complementary policy. Government also issued advice in September 2019 stating such SPDs must no longer set out 'formulaic' contribution asks, which considerably limits what such an SPD can do). Subject to detailed consideration of recent changes to national policy and regulations on developer contributions, the aim is for a draft for consultation by early 2020; version ready for adoption by early 2021.
- **Design Guide SPD:** this will be an updated version of our current SPD, bringing up to date detailed design related guidance. Draft for consultation in the first half of 2020; version ready for adoption by early 2021.

3.34 The above scheduled dates should be regarded as indicative rather than fixed, and where possible earlier dates will be sought.

Neighbourhood Planning

3.35 For those unfamiliar with the concept, the government backed 'Locality' website (<https://neighbourhoodplanning.org/>) summarises a Neighbourhood Plan as follows:

"In very simple terms, a neighbourhood plan is:

- *A document that sets out planning policies for the neighbourhood [parish] area – planning policies are used to decide whether to approve planning applications*
- *Written by the local community, the people who know and love the area, rather than the Local Planning Authority*
- *A powerful tool to ensure the community gets the right types of development, in the right place"*

3.36 Thus, whilst the preparation of a Neighbourhood Plan is entirely down to a Parish Council, East Cambridgeshire District Council can support their preparation (and legislation prescribes the minimum such support, such as the holding of a referendum at the end of the process).

3.37 In July 2018, Full Council updated its earlier (2015) commitments in respect of supporting any parish council which decides to prepare a Neighbourhood Plan, in Part 4 of a document known as a Statement of Community Involvement (SCI), available here:

<https://www.eastcambs.gov.uk/local-development-framework/statement-community-involvement-sci>

3.38 Over recent years, a number of parish councils have embarked on the journey of preparing such a Plan, with two (Fordham and Sutton) successfully gaining a completed Neighbourhood Plan for their area. For further details on Neighbourhood Planning in East Cambridgeshire, including those parish councils which have indicated their desire or have commenced preparing such a Plan, are available here:

<https://www.eastcambs.gov.uk/local-development-framework/neighbourhood-planning>

3.39 Officers of the Council have supported parish councils on a regular basis, and have held 'parish conferences' explaining in more detail the pros and cons of embarking on preparing a Plan. Overall, we have received regular positive feedback from the parish councils we have assisted.

3.40 A recommendation of this report, therefore, is to demonstrate a continued commitment to support parish councils, helping them decide whether preparing a Neighbourhood Plan is good idea for their area, and, if they decide to prepare a Plan, helping them throughout the process in line with our commitments set out in the SCI.

4.0 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT

4.1 If the recommendations in this report are approved, then there are no financial implications arising, and actions can be covered by existing budgets. However, if it is determined that preparation of a Local Plan be commenced, then it is likely such a Local Plan will require £500-£750k in additional resources (for reasons described in this report), spread over a three year period.

4.2 An Equality Impact Assessment (INRA) is not required, because the recommendations in this report are not proposing the commencement or adoption of any new Policy or project.

5.0 APPENDICES

Appendix 1 – A Review of the East Cambridgeshire Local Plan 2015

Appendix 2 – A Statement on the outcome of the Review

Appendix 3 – A Revised LDS for adoption

<u>Background Documents</u>	<u>Location</u>	<u>Contact Officer</u>
East Cambridgeshire Local Plan, April 2015	Room12A The Grange Ely	Richard Kay Strategic Planning Manager (01353) 616245 E-mail: richard.kay@eastcambs.gov.uk

Appendix 1 – Review of East Cambridgeshire Local Plan April 2015

In accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), this assessment forms the formal 'review' of the East Cambridgeshire Local Plan 2015.

The structure of this 'review' is based upon government advice at Paragraph: 065 Reference ID: 61-065-20190723 of the NPPG, as issued on 23 July 2019.

Conformity with national planning policy

The April 2015 Local Plan was prepared to be in conformity with the NPPF as published in 2012. However, that NPPF has been revised and republished in 2018, and again in February 2019.

The updated NPPF is similar to the 2012 version (and in some places is identical), but some aspects of the new version are different.

The Local Plan is, therefore, considered to be ***predominantly but not entirely*** in conformity with national policy. Areas of non-conformity include:

- Affordable housing policy is slightly different in the new NPPF, with affordable housing no longer to be sought on sites which are not major developments (fewer than 10 dwellings), whereas previously it was 11. The definition of what constitutes an affordable dwelling has been considerably widened. The new NPPF also refers to 10% of the homes to be available for affordable home ownership. The 2015 Local Plan is slightly out of date, but not critically so and the new NPPF rules can be (and are being) implemented without the need for Local Plan policy to be updated. Planning Committee received a more detailed note on this matter on 2 October 2019.
- The way an authorities' housing need is calculated has been altered. Rather than relying on an Objectively Assessed Need (OAN) figure derived from a variety of independent evidence-based sources, government has introduced a new Local Housing Need (LHN) method which incorporates a standard methodology for each local authorities' housing need. However, and notwithstanding that the LHN result changes every year, the annual housing target identified in the 2015 Local Plan is remarkably similar to the latest LHN target for East Cambridgeshire.
- NPPF has updated objectives for promoting sustainable transport (with an emphasis on walking, cycling and public transport provision) and states that the planning system should actively manage patterns of growth in support of these objectives. However, none of this is at significant conflict with the 2015 Local Plan.
- There is a greater emphasis in the new NPPF on good design, but it is not prescriptive, and therefore the 2015 Local Plan broadly remains in line.

- Biodiversity requirements have been strengthened in the new NPPF, especially around the need for a 'net gain' in biodiversity. The 2015 Local Plan is less demanding. However, this shortfall could be overcome by other means, such as preparation of supplementary planning documents.

Other elements of the updated NPPF follow a similar theme to the commentary above; namely, the 2015 Local Plan remains broadly in line with the 2019 NPPF, but not entirely so. A new Local Plan would obviously close those inconsistency gaps, but, on this ground alone, there does not appear justification to commence a new Local Plan. Put simply, the new NPPF can be used for decision making in any event, especially in those areas where the 2015 Local Plan is not fully aligned.

Changes to local circumstances; such as a change in Local Housing Need

Fundamentally, since 2015, there has been no substantive change of circumstance in the district. In particular, the identified annual housing 'need' and target remains very similar to what it has been for the past several years (unlike most districts whereby the LHN method has resulted in a considerable swing in annual need, either up or down).

Perhaps the biggest change to local circumstances of note is the establishment of the Combined Authority, which is discussed further below.

Housing Delivery Test performance

East Cambridgeshire's HDT performance is acknowledged as being poor, though it has to be remembered what the HDT is about: namely, it is a test of how many homes developers have built (or 'delivered'), not a test of a council's performance.

In August 2019, the Council published, as it was required to do so, a HDT Action Plan, which broadly identified what it believed to be the causes of the poor test result, and what action might be undertaken. In short, it found that ECDC was providing ample permission for homes, and had a robust planning service in place to support developers, but, put simply, developers were not building homes they had permission for at anything like the rate which could be expected.

As such, the HDT Action Plan process does not provide evidence that a new Local Plan is required.

Whether the authority can demonstrate a 5 year supply of deliverable sites for housing

The Council cannot presently demonstrate a 5 year supply of deliverable sites, when applying national methodology. This 'failure' is entirely down to the low level of delivery of (built) homes since 2011, with such backlog of unbuilt homes being added to what we are required to deliver in the next five years, so much so that a near impossible target is now set by government as to how many homes need building in East Cambridgeshire in the next five years (approximately five times more than was achieved in the previous five years).

Once the 2015 Local Plan is five years old (i.e. in April 2020), such 'backlog' is removed and it appears extremely likely that the council will then be able to demonstrate a 5 year supply of deliverable sites.

Accordingly, adopting a new Local Plan would have no material benefit in terms of passing this particular 'test'. If anything, a new Local Plan could place the Council at greater risk of future failing the test, because 'backlog' would once again start to accumulate.

As such, the present failure to not being able to demonstrate a five year land supply does not provide evidence that a new Local Plan should be prepared.

Whether issues have arisen that may impact on the deliverability of key site allocations

No key site allocations as set out in the 2015 Local Plan have any issues which have arisen since its adoption which would render such allocations as undeliverable.

As such, there is no evidence under this criterion which points to the need to undertake a new Local Plan.

Appeals performance

The Council's appeal performance is generally acceptable, and it is not apparent how a new Local Plan would either reduce the level of appeals or result in a greater number of appeals being rejected.

Success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report

Neither the Local Plan nor the AMR set out a policy-by-policy set of indicators.

The impact of changes to higher tier plans

There are no 'higher tier' plans which have been adopted or under preparation since the 2015 Local Plan was adopted.

However, since 2015, the Combined Authority has been set up and it has the duty to prepare a 'non-statutory spatial framework' (NSSF). This is not a 'higher tier plan' as such, due to its non-statutory status, but nevertheless is intended to give direction as to how the Cambridgeshire-Peterborough area should grow in the future. The NSSF is currently being prepared, with a consultation document expected in Autumn or Winter 2019 and a finalised version in 2020.

Whilst a future East Cambridgeshire Local plan would not be obliged to follow what that NSSF says, the expectation is that it should attempt to align with its aims and objectives.

On this basis, this gives weight to delaying slightly preparation of a new Local Plan for East Cambridgeshire, in order to await the outcome of the NSSF.

Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need

Near neighbours South Cambridgeshire*, Cambridge City*, Fenland and West Suffolk have all committed to preparing a new Local Plan, and are all at the early stages of doing so (* a joint plan).

None have to date identified that they are unable to meet all their housing need, though it is too early in their plan-making process for a conclusion on this to be reached. That said, there is no expectation that any of those councils will be seeking to meet some of their need in East Cambridgeshire.

With several neighbours commencing a new plan, all of whom are, like East Cambridgeshire, within the 'Cambridge Housing Market Area', aligning a new Local Plan for East Cambridgeshire with a similar timetable would be helpful and could mean any strategic cross-border issues are more easily considered and dealt with. It could also result in some cost savings through shared evidence base production, compared with East Cambridgeshire preparing a plan on a timetable not aligned with neighbours.

Overall, plan-making activities of other authorities does add some weight to the argument for East Cambridgeshire commencing a new Local Plan. However, it is not compelling evidence and is more for beneficial practical and slight financial reasons rather than 'planning' reasons.

Significant economic changes that may impact on viability

Directly and locally, there has been no significant change that may impact on viability. That said, both nationally and sub-regionally, there has been considerable economic change, though the greatest uncertainty is yet to come, with the imminent leaving of the European Union, on terms not yet finalised (at the time of writing). The UK government response to Brexit, once it is known in what shape that will be, could have significant implications for planning and economic development, which could be an argument to delay commencing a new Local Plan in the short term.

Whether any new social, environmental or economic priorities may have arisen.

No other priorities of significance have arisen

Other matters

Government has indicated that a priority for Autumn 2019 is the issuing of a Green Paper on the planning system, the content of which is expected to include significant suggestions for the way the planning policy system functions. Awaiting such direction of travel could be sensible, rather than commencing a new Local Plan now and having to adjust to 'different rules' mid-way through its preparation.

Appendix 2 – Statement to be published following the Review (if recommendation approved)

East Cambridgeshire Local Plan – April 2015

A Statement setting out the outcome of a Review of the Local Plan 17 October 2019

Introduction

Section 17 of the Planning and Compulsory Purchase Act 2004, together with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires a Council to Review its Local Plan prior to it becoming five years old. The review is necessary to determine whether or not a new Local Plan is need of preparing.

The East Cambridgeshire Local Plan 2015 becomes 5 years old on 21 April 2020, and therefore a Review is required by that date.

Outcome of the Review

On 17 October 2019, East Cambridgeshire District Council concluded a Review and determined that its Local Plan 2015 does not at the present time require to be updated. As such, no new Local Plan for the area is to be commenced.

Reasons for Considering that no new Local Plan is necessary

The Council determined that it was not appropriate to commence preparation of a revised/new Local Plan at the present time because of the following primary reasons, with a more detailed assessment set out in the public report to Council of 17 October 2019:

- Following a detailed Review, no compelling evidence indicated a need to commence a new Local Plan at the present time;
- Some evidence indicated that waiting to commence a new Local Plan to a future date had benefits, including such a plan being able to align with:
 - the yet to be published national Green Paper on planning (due Autumn 2019);
 - the yet to be finalised Combined Authority Non Statutory Spatial Framework for Cambridgeshire-Peterborough (due by end of 2020/21);
 - the national response to the Brexit situation.

Commencing a Local Plan prior to these wider matters concluding could result in aborted work.

- The cost implications of preparing a new Local Plan, estimated at between £500,000-£750,000, particularly when weighed against the less than compelling evidence of the need for a new Local Plan at this stage.

Commitment to a further Review

The Council committed to undertaking a second Review of the Local Plan within 18 months of the conclusion of this first Review. That second Review will once again determine whether or not a Local Plan should be commenced for the area.