Uttlesford Local Plan Work Plan and Risk Assessment

Planning Policy Working Group 13 July 2015

Contents

1.	Introduction	3
	The National Picture	3
	Figure 1: Local Plan stages (source: Planning Practice Guidance)	4
	Slow Progress with Local Plans	5
	Why Plan?	5
	Further Information	5
2.	Work Plan and Key Tasks	6
	Table 1: Indicative Work Plan	7
	Task 1: Public Consultation	8
	Task 2: Stakeholder Engagement	8
	Task 3: Objectively Assessed Needs (OAN)	9
	Task 4: Constraints Mapping	. 10
	Task 5: Strategic Housing Land Availability Assessment (SHLAA)	. 10
	Task 6: Transport Assessment	11
	Task 7: Strategic Sites Deliverability Assessment	11
	Task 8: Financial Viability Appraisal	12
	Task 9: Infrastructure Planning	. 12
	Task 10: Green Belt Assessment	. 12
	Task 11: Update Technical Studies	12
	Task 12: Gypsies and Travellers	13
	Task 13: The Development Strategy	13
	Task 14: Sustainability Appraisal (SA)	13
	Task 15: Strategic and Place-specific Policies	. 14
	Task 16: Development Management Policies	. 14
3.	Risk Assessment	15
	Resource risks	. 15
	Operational risks	. 16
	Political risks	. 16
	Table 2: Risk Assessment	. 18
App	pendix A: National Progress with Local Plans	22
Anr	pendix B: Glossary and list of Acronyms	26

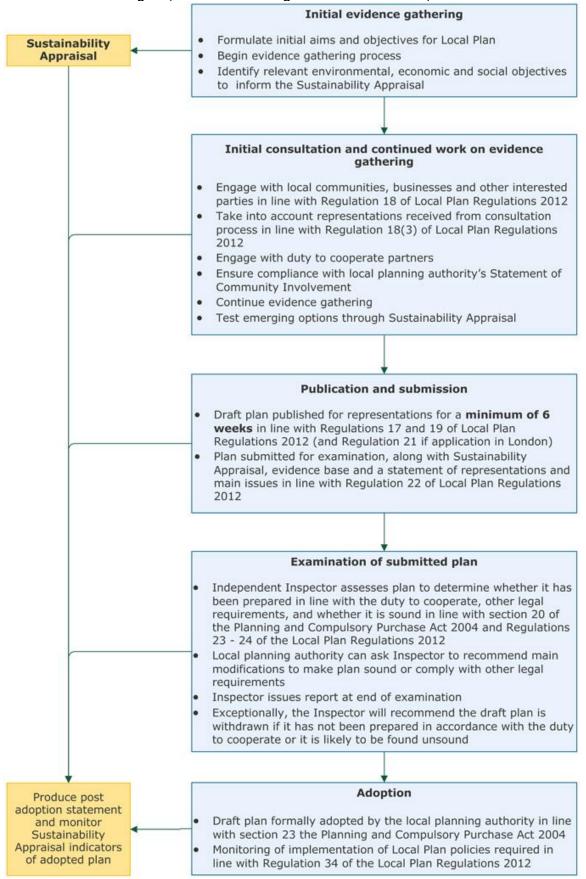
1. Introduction

- 1.1 Following receipt of the report of the Planning Inspector on the previous submission Local Plan in December 2014, and subsequent withdrawal of the plan in January 2015, Uttlesford District Council has restarted the Local Plan formulation process, including reconsideration of the options for development.
- 1.2 Establishing a clear and agreed process is central to attainment of a sound Local Plan. A Work Plan is an important part of this because it enables appropriate resources to be targeted at each task, and also because it helps those engaged in the process of plan-making, in particular District Councillors, to understand the challenges involved in making a sound plan.
- 1.3 The approach taken in this Work Plan is to focus on setting out what needs to be done in order to achieve a sound plan, and to consider the dependencies between the tasks in order to identify points where work may be carried out in parallel rather than consecutively, in order to ensure that good progress can be maintained. This is considered to be a more useful approach than setting out a formal timeline, which at this stage would be little more than educated guesswork and would need to be continually revised.
- 1.4 Risk management is another important aspect of the Work Plan, addressed in Chapter 3. The process depends on timely inputs from third parties, many of which have different priorities and may be facing their own resourcing constraints. It also depends on strong political leadership from District Councillors, who need to understand the process involved and be able to explain it to local people.

The National Picture

- 1.5 In March 2012 the National Planning Policy Framework (NPPF) was introduced, and a set of supporting Planning Practice Guidance (PPG) was introduced a year later. This framework is underpinned by the Planning and Compulsory Purchase Act 2004. Plan-making is part of a 'quasi-judicial' process and therefore Local Planning Authorities are constrained by national policy and guidance in terms of what they must do in their Local Plans, if those plans are to carry legal force.
- 1.6 National Planning Practice Guidance (PPG) sets out the main stages in Local Plan preparation, as in **Figure 1** below. As this shows the stages are governed by the Local Plan Regulations 2012.

Figure 1: Local Plan stages (source: Planning Practice Guidance)



Slow Progress with Local Plans

- 1.7 Many observers have remarked on the slow progress nationally with Local Plans. Many Local Plans across England have been subject to delay and many have been withdrawn following submission to the Planning Inspectorate for examination.
- 1.8 There are 337 Local Planning Authorities (LPAs) in England, and the Planning Inspectorate (PINS) maintains a schedule of progress towards Local Plans. PINS data, presented in **Appendix A**, shows that since the introduction of the NPPF in March 2012, only 90 LPAs have had their Local Plans found sound following examination. This represents around 27% or around 1 in 4 LPAs with a post-NPPF Local Plan.
- 1.9 It is considered that the PINS figures present a more positive picture than is in fact the case, since they do not show the significant number of plans which have been found sound only subject to an early or immediate review. The most recent Local Plan, for Chichester District, is one such example.
- 1.10 Figures for Local Plans which have been submitted are higher, but this does not reflect the fact that a significant number of plans have been withdrawn following advice from PINS.
- 1.11 PINS figures also show that for a sample of the past 12 Local Plans to be found sound, the average time from the pre-submission consultation (step 6 in the Work Plan presented below) to submission to the Planning Inspectorate was 6 months, and time from submission to being found sound ranged between 12 months in the quickest case to 29 months in the slowest case. These are significant considerations for a realistic Local Plan work programme.

Why Plan?

1.12 Despite slow progress with Local Plans, there is a general consensus that they remain the best available mechanism to provide local input to shaping local development. Local Plans should set out a locally agreed vision for future development, and provide a framework for managing the cumulative impacts of development. They also enable consideration of 'larger than local' issues such as cross-boundary infrastructure provision, providing a framework for investment in an area.

Further Information

1.13 NPPF and PPG: http://planningguidance.planningportal.gov.uk/. Planning Inspectorate figures (see 'strategic issues'/core strategies): http://www.planningportal.gov.uk/planning/planningsystem/localplans

2. Work Plan and Key Tasks

- 2.1 Whilst the PPG diagram above shows the formal process in relation to the Local Plan Regulations, it does not explain the wider process of what is involved in preparing a Local Plan.
- 2.2 The process of formulating a Local Plan consists of a number of tasks which together help to move forward the process of plan formulation. There is no simple linear sequence of tasks, but there are 'critical dependencies' between tasks, meaning that it is not possible to progress to the next stage until a given task is complete.
- 2.3 An indicative Work Plan is set out in **Table 1**. This represents a simplified outline of the main tasks. The Work Plan does not show Examination or Adoption, which follow on from Step 6. There are many sub-tasks within each task, but for ease of comprehension the Work Plan has been restricted to the main tasks.
- 2.4 In practice it is very difficult to allocate a time allowance to many of the tasks involved in Local Plan work, because much of the work is dependent on external inputs from third parties, and many of the future inputs are dependent on the nature of the emerging plan. For example, in general a plan which relies on strategic scale development will face more complex issues than one which can rely on small scale sites, and the time taken to address the issues will be commensurately longer.
- 2.5 Given the uncertainty surrounding the process at this stage, no dates have been included in the work programme. However at a later stage the Work Plan will be used to update the Local Development Scheme (LDS), which was last published in February 2015.
- 2.6 The plan-making process is a gradual process of testing and refinement, in which new evidence is assembled and then balanced against planning principles set out in the NPPF. This means that not only the emerging plan, but also the scope of technical work itself, is likely to evolve as work progresses.
- 2.7 Flexibility is therefore a crucial element of plan-making. The Planning Policy Working Group provides a helpful forum for discussion of any potential changes.

Table 1: Indicative Work Plan

Task No.	Task	Step 1: Initial Preparation	Step 2: Options	Step 3: Plan Formulation	Step 4: Draft Plan	Step 5: Refinement	Step 6: Pre-submission
1	Public Consultation		Options	Comment handling	Draft Plan	Comment handling	Pre-submission plan
2	Stakeholder engagement	Engagement	Engagement	Engagement	Engagement	Engagement	DtC Statement
3	Objectively Assessed Needs	SHMA, demographic projections, jobs-housing alignment					
4	Constraints mapping	Mapping					
5	Strategic Housing Land	Call for Sites	Call for Sites	Call for Sites	Call for Sites	Call for Sites	
3	Availability Assessment	Criteria	Mapping	Assessment			
6	Transport Assessment	Prepare models	Prepare models	Mitigation design	Mitigation testing		
7	Strategic Sites Delivery				Preliminary work	Delivery	
8	Financial Viability			Whole Plan Viability		Strategic Site viability	
9	Infrastructure Planning	Preliminary work	Preliminary work	Assessment	Draft Schedule	Sign-off letters	IDP
10	Green Belt Assessment			GB Report			
11	Update Technical Studies		Technical reports	Technical reports			
12	Gypsies and Travellers	Needs Assessment	Site options	G&T report			
13	Development Strategy		Stage 1		Stage 2		Final
14	Sustainability Appraisal	Scoping Report	Stage 1 SA		Stage 2 SA		Final SA Report
15	Strategic and Place- specific policies			Drafting		Revising	
16	Development Management policies					Updating	

2.7 The following explanations provide more detail as to the activities involved in each task shown on the indicative Work Plan, and any dependencies upon other tasks.

Task 1: Public Consultation

- 2.8 Three main consultations are proposed, including a consultation on the options (step 2), a draft plan (step 4) and a pre-submission plan (step 6). In between these consultations there is a considerable amount of work for the Planning Policy Team in terms of preparing the consultation documents, preparing any consultation materials, and then afterwards in terms of processing the comments, summarising the planning issues raised, and then identifying whether any of the issues raised require amendments to the plan or further technical work. This is shown as 'comment handling' at steps 3 and 5. Depending on the number of comments and the complexity of the issues this can affect the plan timescales.
- 2.9 If changes are necessary following the final, pre-submission consultation (step 6) then the Council will need to consider whether these are so significant as to require a further consultation. This might be the case, for example, if a new strategic site is proposed or an existing one is dropped. However if the Council is satisfied that any changes could be addressed through an inspector's modifications at examination then the Council should submit the plan, together with a Consultation Statement for the inspector to consider as part of the examination in public.
- 2.10 District Councillors have a significant role in public consultation, because they hold a leadership role in representing the District as a whole, and are also the decision-makers on the Local Plan. It is therefore important that District Councillors should actively engage with local people at consultation times and explain the Local Plan process.
- 2.11 A consultation plan setting out the proposed consultation activities and schedule will be discussed by the Planning Policy Working Group and agreed prior to each Local Plan consultation.

Task 2: Stakeholder Engagement

- 2.12 'Key stakeholders' are those whose input is likely to be particularly necessary in order to ensure that the plan is sustainable and deliverable. These include the Duty to Co-Operate bodies (including adjoining Local Planning Authorities, County Council, and the Local Enterprise Partnerships), Statutory Consultees (the Environment Agency, Heritage England, Natural England, and Highways England), infrastructure delivery bodies, housebuilders and other developers.
- 2.13 In addition to these bodies, Parish and Town Councils are considered to be key stakeholders, and the Council will consider mechanisms by which Parish and Town Councils may engage in the Local Plan process beyond the three main consultation events. This may include, for example, opportunities to comment on relevant technical work, and updates on Local Plan progress.

- 2.14 One of the key Examination documents will be the Duty to Co-Operate statement, which must set out how the Council has engaged positively, actively, and on an on-going basis, and what the outcomes of that engagement were. The Council will seek a formal position statement from the key stakeholders, in particular at Step 4 (draft Plan) and Step 5 prior to the pre-submission consultation. This written audit trail will assist the Local Plan Inspector in understanding how the plan has evolved. In the absence of a formal statement the Council will need to risk assess the options and the implications for the work programme.
- 2.15 It is proposed that notes should be taken of any meetings and that these should be published on the Council's website, together with any submissions in respect of sites being promoted. The main purpose of such meetings will be to test deliverability. The Council will critically appraise any submissions and where necessary will seek third party input to this process where specialist knowledge is considered necessary. It is neither necessary nor practical for Officers to attend regular meetings with all the site promoters and a pragmatic approach will be necessary depending on the complexity of the planning issues arising.
- 2.16 It is recommended that District Councillors do not engage directly with landowners and developers, since this may compromise the ability of the Council to make impartial decisions.

Task 3: Objectively Assessed Needs (OAN)

- 2.17 Case law has established that there is a two-step process in establishing a housing requirement. Firstly, Local Planning Authorities should objectively assess their development needs without consideration of the constraints. Only then should constraints be considered.
- 2.18 The NPPF and PPG contain a number of requirements in terms of how OAN should be derived. The key components of OAN are demographic projections based on past trends, which the PPG says are the 'starting point' for assessment, and then the Strategic Housing Market Assessment (SHMA), which must take account of market signals, affordability, and the wider Housing Market Area (HMA), beyond the district boundaries (NPPF Paragraph 47).
- 2.19 It is also necessary to ensure that there is a coherent understanding of the link between housing and jobs across the Functional Economic Market Area. i.e. whether there are enough homes for the workers and vice-versa. Consideration of the role and future development of Stansted Airport will be an important part of this work.
- 2.20 Delays with establishing the OAN need not necessarily delay the options stage of the plan, but it would be helpful. New demographic projections are published at intervals by the Office for National Statistics (ONS) which could necessitate an update to the SHMA. In turn this could suggest that

adjustments to the housing requirement (and hence also to the amount of land required) should be made. For this reason it is advisable that sites are not 'dropped' from the strategy selection process too early.

Task 4: Constraints Mapping

- 2.21 Part of the evidence in relation to sites is available through mapped datasets which can be overlaid onto site options in order to assess their effects. For example, flood mapping, agricultural land classifications, designated wildlife sites, listed buildings, minerals areas, conservation areas, Green Belt, and a number of other features may be mapped in order to build up a picture of constraints. This information will be useful in relation to both the SHLAA (see below) and the early stages of the Development Strategy work.
- 2.22 Constraints may be classified into two types: exclusionary constraints are those which automatically rule out development, for example Flood Zone 3b (1 in 20 year flood zone). The majority of criteria are discretionary constraints, in that they are not 'absolute' constraints but may, depending on the assessment against the NPPF policies as a whole, suggest that particular sites are unsuitable for development. This is where the role of informed judgement comes in through the development strategy process (see Task 13).

Task 5: Strategic Housing Land Availability Assessment (SHLAA)

- 2.23 The SHLAA is a database of sites submitted by landowners as part of a Call for Sites which are mapped and assessed for suitability, achievability, and deliverability. It is a high-level desk-based factual exercise using mapped constraints.
- 2.24 The Call for Sites is ongoing throughout the plan-making process and does not 'end', although it can be helpful to set an interim date for submissions in order to prompt an early response so that as many site proposals as possible can be given early consideration.
- 2.25 The SHLAA forms part of the evidence base and the main purposes are to demonstrate the position in relation to the 5-year land supply and also to inform the plan-making process. The SHLAA is a criteria-based assessment and is relatively limited in its ability to assess large or strategic sites. For larger sites a range of assessment techniques are necessary, including Transport Assessment and consideration of deliverability issues.
- 2.26 The SHLAA is a technical study rather than a decision-making document. It is proposed that the draft SHLAA assessments will be sent to the relevant Parish or Town Council and any Neighbourhood Forums for comment as part of the fact-checking and quality control exercise.
- 2.27 The SHLAA will be used to inform the development strategy (Task 16), which is where the decisions will need to be taken in a clear audit trail.

Task 6: Transport Assessment

- 2.28 Highways England (responsible for the motorways and some major trunk roads such as the A120) and Essex County Council as the Highways and Transport Authority are the key stakeholders in this process as the relevant statutory bodies. Local Planning Authorities rely on these bodies to come to a view on their draft Local Plans.
- 2.29 The NPPF states that development should only be prevented or refused when the transport impacts would be 'severe' (Paragraph 32). However the NPPF does not define 'severe' and this can only be established through a process of designing mitigation measures and then testing their effectiveness through a transport model. This is particularly important for strategic scale development proposals.
- 2.30 Testing is an iterative process and if no demonstrable solution can be found following the first round of testing then further measures may need to be drawn up and tested. This is potentially a very expensive and time-consuming process, and is dependent on the existence of an adequate transport model for the area in question. If there is no adequate transport model then one may need to be created: depending on the type and extent of model this can take 12 months or more.
- 2.31 Highways England has stated that it considers 'severe' impacts to be those which compromise safety (e.g. queuing from a motorway slip-road into the main carriageway) but most County Councils have not defined a position on this, preferring a context-specific approach derived through evidence.
- 2.32 Most County Councils are not able to resource Local Plan transport assessments and this burden falls to LPAs. The Council will need to consider carefully how this evidence will be assembled and what arrangements will need to be put in place to ensure that the Local Plan is supported by the transport authorities.

Task 7: Strategic Sites Deliverability Assessment

- 2.33 Deliverability may cover a wide range of issues which have the potential to affect the robustness of the Local Plan.
- 2.34 Other common deliverability issues might include: phasing constraints; minerals and waste planning issues including land contamination and remediation; 'ransom strips' preventing or limiting access to a site; potential for 'compulsory purchase or other interventions by the public authorities; land assembly and agreements to joint working between landowners and developers as part of a coherent, masterplanned approach.

Task 8: Financial Viability Appraisal

2.35 Whole-plan viability appraisal is necessary to ensure that the proposed level of affordable housing is viable taking account of the cost burden as a whole; and a site-specific appraisal of costs for strategic sites will be needed where significant on and off-site strategic infrastructure may be required. The strategic site appraisal should be undertaken in the latter stages of plan preparation following publication of the draft Local Plan.

Task 9: Infrastructure Planning

- 2.36 In order to demonstrate that the Local Plan is deliverable it should be supported by an infrastructure programme including an infrastructure schedule which sets out what infrastructure is needed, when it is needed, who will be responsible for delivering it, a rough estimate of how much it will cost, and the anticipated funding sources.
- 2.37 The Infrastructure Delivery Plan (IDP) is a 'live' programme that may be updated annually as part of the monitoring process. LPAs are reliant on third-party input in developing their IDPs, some of which are reluctant to invest time and resource in the 'options' stage of plan-making until there is clarity about the LPA's preferred plan. This means that much of the work on the IDP cannot be undertaken until *after* the Preferred Options plan is published for consultation. This poses a risk to the plan-making process if infrastructure hurdles emerge at this late stage.
- 2.38 The NPPF makes a distinction between the level of detail required in the first five years of the plan and the subsequent period, acknowledging that it is difficult to plan further ahead with certainty.

Task 10: Green Belt Assessment

- 2.39 An assessment of the Green Belt is necessary in order to ensure that the existing boundaries are robust and defensible, and to demonstrate that every effort has been made to meet the OAN. It is important that the Council does not pre-judge where development should be located until the necessary technical evidence has been assembled in order to make an informed decision.
- 2.40 Green Belt should only be amended in 'exceptional circumstances, through the review of the Local Plan' (NPPF Paragraph 83). The Green Belt Assessment itself is as technical study and so will not make this judgement, which will be a policy decision for the Council as part of the overall development strategy.

Task 11: Update Technical Studies

2.41 It is necessary to ensure that the technical studies are reasonably up-to-date in order to ensure that there is a sound basis for assessment of the strategy.

A number of studies are likely to require updating, including the Strategic Flood Risk Assessment (2008) and the Employment Land Review (2011).

Task 12: Gypsies and Travellers

- 2.42 National Planning Policy for Gypsies and Travellers (March 2012) is clear that housing needs for the travelling community should be addressed by Local Planning Authorities. The Planning Inspectorate has taken a tough stance on this issue (most recently in the case of the Maldon Local Plan), and is clear that provision for Gypsies and Travellers should be made through the Local Plan.
- 2.43 The process for meeting Gypsy and Traveller needs is similar to that for housing for the settled community. There needs to be an objective assessment of needs, followed by an assessment of constraints, and a thorough assessment of the site options. Assessment of cross-boundary unmet needs for Gypsy and Traveller pitches and plots may be necessary in the same way that this principle is applied to other strategic cross-boundary planning matters under the Duty to Co-Operate.

Task 13: The Development Strategy

- 2.44 The development strategy will set out where and when growth should be planned, what the link between the different mix of uses will be, what policy approaches will be introduced to address the specific challenges of the strategy, and how the plan meets the requirements of the NPPF. It will also incorporate the emerging Strategic Vision.
- 2.45 Preparation of the development strategy is a gradual process of testing and refinement, and it is proposed that progress towards the final strategy will be set out in a number of preliminary reports at appropriate interim points preceding each of the major consultation stages.
- 2.46 The various stages in the preparation of the development strategy therefore represent key milestones in the preparation of the Local Plan, and will be the key decision-making points, for discussion and debate at the Planning Policy Working Group.

Task 14: Sustainability Appraisal (SA)

- 2.47 Sustainability Appraisal is a requirement of the Planning and Compulsory Purchase Act 2004 and the Strategic Environment Assessment (SEA) Directive. It is a process by which the sustainability implications of options for an emerging plan may be identified, and improvements made.
- 2.48 One important aspect of Sustainability Appraisal is assessment of 'reasonable' alternatives to the plan. It is another means of challenging the plan and ensuring its robustness. By ensuring that equal consideration has been given to alternative options, the LPA is able to demonstrate that the plan is fully justified, and also that potential measures to mitigate the impacts of

- development have been considered. The Council has appointed independent consultants with a specific remit to test and critically appraise the emerging Local Plan strategy and the broad options.
- 2.49 SA usually involves the formulation of a limited number of alternative options, which may be refined and reviewed at various stages of plan preparation. The Planning Advisory Service (PAS) is and will provide independent advice to the Council on the process of sustainability appraisal including a 'critical friend' report on the work submitted to the previous Local Plan examination. Officers have already discussed the process in detail with the PAS consultants and this should provide a robust basis for taking forward a sound process.
- 2.50 The initial stage of the SA is to set out the SA Assessment Framework in a Scoping Report. This sets out the 'baseline data' and sustainability criteria against which the alternative options will be appraised.
- 2.51 Further to this the emerging development strategy and strategic options should be appraised and then the findings of the appraisal should be incorporated into a revised development strategy.
- 2.52 The SA alternatives appraisal should be differentiated from the suitability assessment of sites in the SHLAA, which uses some sustainability criteria to assess individual sites in isolation. However in practice many of the criteria will be relevant to SA and this assessment will be carried across into the SA in terms of the assessment of individual sites. A further stage in the SA will involve assessment of the cumulative impact of groups of sites upon settlements and the environment.

Task 15: Strategic and Place-specific Policies

2.53 Policies which guide development to particular places will emerge from the work on the development strategy. Strategic policies are those which provide the overarching framework for development, and demonstrate consistency with the NPPF. These might include, for example, the approach to delivering the vision for the District, ensuring a balance of housing, jobs, and other land uses, the phasing of development and the housing trajectory, the strategy for towns and villages, for Stansted Airport, and trigger points for infrastructure provision.

Task 16: Development Management Policies

- 2.54 These are generic policies which apply District-wide and which are important in considering individual planning applications. These might include policies on householder applications, environmental or other policy constraints.
- 2.55 Although the current set of policies may be considered generally 'sound', it will be important to update the policies in order to ensure compliance with the latest national requirements.

2.56 In order to ensure that policies are capable of effective implementation and can be defended at appeal if necessary, the involvement of the Development Management section will be important as part of a process of quality control.

3. Risk Assessment

- 3.1 Risk assessment is a key part of any Local Plan work programme. There are numerous risks to the work programme, and as has been demonstrated above, nationally progress with Local Plans has been very slow and delays have been almost universal across the country. Whilst good project management can help to minimise risks, the experience of most LPAs in preparing Local Plans has been one of frustration and delay.
- 3.2 In many cases a risk assessment can help LPAs to manage the risks and reduce the impact on the work programme. However there are likely to be some cases where risk management opportunities are limited or prove ineffective. Examples of this might include changes in government policy, or failure of key stakeholders to provide clarity in relation to their own areas of responsibility.
- 3.3 In broad terms there are three main types of risk: *resource risks, operational risks, and political risks.*

Resource risks

- 3.4 Preparing a Local Plan is very expensive and can be a significant call on the resources of Local Planning Authorities (LPAs). The technical nature of much of the evidence requires the commissioning of specialists (for example in sustainability appraisal, ecology, transport, flood risk, and financial viability) who can be called upon to produce reports and if necessary to provide support at Examination in Public.
- 3.5 Uttlesford District Council has a small Planning Policy team with responsibility for preparing the Local Plan, comprising four officers (three full-time). The priorities of this limited staff resource need to be carefully managed in order to ensure that progress with the Local Plan is not impeded.
- 3.6 Resource risks can affect not only LPAs but also the key stakeholders upon which they depend in order to progress their Local Plans. Many public sector stakeholders such a County Councils and the NHS are suffering their own resourcing challenges and this can make it difficult to obtain timely information for input to Local Plan formulation, which is often seen by such bodies as non-core activity and therefore low priority.
- 3.7 Private sector stakeholders such as utility companies are often reluctant to provide any financial or cost data for commercial reasons. Water supply companies usually only provide input once a planning application is received, and regard the Local Plan stage in the planning process as too uncertain to invest resources in undertaking expensive investigative modelling work.

- 3.8 These challenges are often complicated by the need for considerable up-front effort to understand the particular needs and challenges of each body, particularly in light of the different terminology and approaches in different specialist fields.
- 3.9 A further risk to the timeline is the resourcing of the Planning Inspectorate (PINS) itself. There has been much publicity given to delays in issuing appeal decisions and this can have knock-on implications for Local Plan examinations.

Operational risks

- 3.10 The formulation of a Local Plan is a complex process, and there is no 'one size fits all' methodology: some limited guidance is available, but it is up to each LPA to devise an approach which addresses the unique set of circumstances in its own area. At the same time, national policy contains many requirements with which Local Planning Authorities must comply. Some requirements, which may seem straightforward as articulated in national policy, often become highly complex and challenging in practice.
- 3.11 Plan-making is an iterative process, involving the gradual accumulation and testing of evidence. Sound judgement is required in terms of what constitutes 'proportionate' evidence in many cases. Sometimes critical new evidence may come to light at a late stage in the plan-making process, which can necessitate early options to be reviewed. At other times the anticipated evidence is not available and a judgement is needed as to how to proceed.
- 3.12 Finally, plan preparation requires the Local Planning Authority to act as a coordinator in drawing together the different strands of the plan. However this co-ordination role is very much dependent on timely input from a wide range of key stakeholders, including site promoters (landowners and developers) and infrastructure providers. Notwithstanding the Duty to Co-Operate, LPAs have no power to compel stakeholders to provide input, and therefore communication and persuasion are an important part of the task of planmaking. Nevertheless this presents a considerable risk to progress with the plan.

Political risks

- 3.14 Local Plans are required to address many contentious issues, for example the location of strategic-scale development sites, as well as provision for Gypsy and Traveller sites, and consideration of the role and function of Green Belt. Politically these are very challenging matters for District Councillors.
- 3.15 As the decision-makers on the Local Plan, the political risks for Councillors are considerable, as are the risks to the plan-making process if Councillors do not fully grasp the challenges. It is therefore important that all Members make an effort to understand national requirements set out in the NPPF and the wider context and implications of their decisions and their public statements.

3.16 Councillors have a crucial role as community leaders representing not just the interests of their Ward, but the interests of the District as a whole. The Planning Advisory Service/Local Government Association provides some salient guidance in relation to this, as set out in the box below:

The Leadership Role of District Councillors

District Councillors have a vital **leadership** role to play to produce a **robust** Local Plan for your area that has **buy in** from all parties.

The key challenge is to listen to the views and aspirations of your constituents and **balance** this with the professional advice of your planning staff in order to **plan** for, and **meet**, the **development needs of your area.**

Source: PAS: Local Plans and Plan-Making – Presentation to Local Plans Steering Groups (April 2015)

- 3.17 Perhaps the most challenging aspect of this comes when the evidence is finely balanced, and then the role of informed judgement becomes all the more crucial, as set out in the section on operational risks above. Councillors must take into account the advice of Officers, but they are not duty-bound by it. However, any decision that is taken contrary to that advice must demonstrate sound planning judgement.
- 3.18 Table 2 below sets out the main risks, as currently appraised in June 2015. The risk assessment may need to be revised and updated as work progresses.

Table 2: Risk Assessment

O = Operational Risk; R = Resource Risk; P = Political Risk

No.	Risk to Local Plan timeline	Implications	Туре	Likelihood	Impact	Mitigation/management options
1	Insufficient evidence on which to base a decision. For example, risk that traffic models for parts of the district are either inadequate or not available, or that M11 Junction 8 solutions are not demonstrated.	Potential indefinite delay since confidence in the deliverability of any plan is low.	Ο	High	High	Ask MP to seek DCLG assistance in provision of advice from a Planning Inspector, and to seek views from relevant government department (e.g. Department for Transport). Work with Local Enterprise Partnerships and key stakeholders e.g. Stansted Airport to build business case for investment.
2	Significant new evidence or material planning concerns received as a result of consultation at Regulation 18 or Regulation 19, resulting in significant changes to the emerging strategy and a need for further consultation.	Depending on scale and significance of changes, could add 6 months to a year to the timeline.	О	Medium	High	Agree main planning issues and anticipated challenges with key stakeholders in writing early on.
3	Concerns about the public consultation process, e.g. people not aware of consultation.	Impacts on confidence in the Local Plan formulation process.	R, P	Low	Medium	Council to agree engagement strategy prior to consultation. All Members to take an active role in explaining and publicising forthcoming consultation within their Wards and to work with Parish and Town Councils to promote consultations.
5	Significant number of public responses to consultation resulting in delays whilst responses are collated, planning issues recorded, issues investigated, and planning issues addressed. Council fails to agree a draft plan,	Allowance made in work programme for four weeks' Officer time. Larger response likely to result in delay. Potential indefinite	R	Medium	Medium High	Group consultation responses making the same or very similar points together, whilst ensuring that material planning issues are properly addressed. Retain additional staff resource. Agency staff to assist with data entry. Provide Member training and guidance.

No.	Risk to Local Plan timeline	Implications	Туре	Likelihood	Impact	Mitigation/management options
	or fails to agree critical aspects of a draft plan, for example relating to provision for Gypsy and Traveller sites.	delay and reduced control over planning appeals.				Planning Policy Team to provide phone contact for Member queries. Member suggestions and concerns can be raised directly with Planning Policy Team at any time and if appropriate given further consideration through a subsequent Working Group meeting.
6	Council need more time to consider the implications of the emerging plan.	May need to allow additional time in work programme.	0	Medium	Low	Provide Members with an opportunity to comment and provide feedback to the Planning Policy Team at all stages during plan formulation, so that views may be addressed as work progresses.
7	Key stakeholders fail to provide a clear view on the implications or acceptability of the emerging development options, or provide a view not supported by adequate evidence.	Case-by-case judgement call as to whether planning issue is critical to soundness. If so, lack of a view could delay plan indefinitely or pose high risk of being found unsound at examination.	O, R	Medium	High	Develop and maintain close communications with key stakeholders. Establish framework for joint working and set out key milestones including expectations in terms of timelines and nature of consultation responses.
8	Other demands on the resources of the Planning Policy Team, for example third party meeting requests (e.g. landowners/developers, Parish Councils)	Allowance has been made in the work programme for key stakeholder meetings (for example with infrastructure providers), but little allowance has been made for other meetings.	R	Medium	Medium	Council to take a view on appropriate resourcing and implications for the timeline. Set up guidance in terms of expectations around of meetings at each stage in the plan-making process to ensure that any meetings add value. Consider alternative to meetings, such as email and phone contact. Consider potential for group meetings rather than single meetings.
9	Neighbourhood Plans prepared which conflict with emerging Local	Could impact on the credibility of both	O, P	Low	Medium	Set up regular email update on District Plan progress to all Parish Clerks.

No.	Risk to Local Plan timeline	Implications	Type	Likelihood	Impact	Mitigation/management options
	Plan.	Local Plan and Neighbourhood Plans.				Encourage email updates and input from Parish Councils which can be considered as part of Local Plan process.
10	Failure to agree on cross- boundary strategic planning matters, for example in relation to location for any unmet housing needs across the Strategic Housing Market Area.	Judgement call as to how much delay is reasonable in order to resolve differences before an LPA submits plan for examination.	O, P	Medium	High	Ensure that the Council has made all reasonable efforts to comply with the Duty to Co-Operate and the NPPF and that this is clearly set out in a Duty to Co-Operate statement. Council should actively participate in mechanisms and groupings to advance cross-boundary strategic planning in a positive fashion.
11	Inconsistency with national or European requirements resulting in failure at examination. For example, failure to comply with SEA Directive, the Development Plans Regulations, or the NPPF/Planning Practice Guidance.	Impact depends on whether an Inspector can address deficiencies through a Main Modification, or whether further work and re-consultation is necessary.	0	Low	High	Use Planning Advisory Service Soundness Checklist to ensure that requirements are covered.

Appendices

Appendix A: National Progress with Local Plans

Total of all Local Planning Authorities with Local Plans found sound since March 2012 (introduction of the NPPF).

Source: Planning Inspectorate, data to end May 2015)

	Local Council	Published	Months from Publication (reg 19) to Submission	Submitted	Months from Submission to Found Sound	Found Sound	Adopted
1	Chichester District Council	Nov-13	6	May-14	12	May-15	
2	North Somerset Council	NA		Jun-13	9	Mar-15	
3	East Cambridgeshire District Council (Revision)	Feb-13	6	Aug-13	17	Mar-15	21-Apr-15
4	Gateshead Metropolitan Borough Council	Sep-13	6	Feb-14	12	Feb-15	26-Mar-15
5	Newcastle Upon Tyne City Council	Sep-13	6	Feb-14	12	Feb-15	26-Mar-15
6	Swindon Borough Council	Dec-12	6	Jun-13	20	Feb-15	26-Mar-15
7	Lichfield District Council	Jul-12	8	Mar-13	22	Jan-15	17-Feb-15
8	South Somerset District Council	Jun-12	6	Jan-13	24	Jan-15	05-Mar-15
9	Cheshire West and Chester Council	Sep-13	3	Dec-13	12	Dec-14	29-Jan-15
10	Rushcliffe Borough Council	Mar-12	7	Oct-12	27	Dec-14	22-Dec-14
11	Southampton City Council (Partial review)	Sep-13	3	Dec-13	12	Dec-14	18-Mar-15
12	Wiltshire Council	Feb-12	5	Jul-12	29	Dec-14	20-Jan-15
13	Ribble Valley Borough Council	May-12		Sep-12		Nov-14	16-Dec-14
14	City of London	Dec-13		May-14		Nov-14	15-Jan-15
15	Middlesbrough Borough Council	Nov-13		Mar-14		Oct-14	
16	Richmondshire District Council	Aug-12		Feb-13		Oct-14	09-Dec-14
17	Thurrock Council (Review)	May-13		Jul-13		Oct-14	28-Jan-15
18	Daventry Dictrict Council	Feb-11		Dec-12		Oct-14	15-Dec-14
19	Mendip District Council	Nov-12		Dec-13		Oct-14	15-Dec-14
20	Northampton Borough Council	Feb-11		Dec-12		Oct-14	15-Dec-14
21	South Northamptonshire Council	Feb-11		Dec-12		Oct-14	15-Dec-14
22	North Warwickshire Borough Council	Nov-12		Feb-13		Sep-14	09-Oct-14
23	Leeds City Council	Jan-13		Apr-13		Sep-14	12-Nov-14
24	Broxtowe Borough Council	Jun-12		Jun-13		Jul-14	17-Sep-14

	Local Council	Published	Months from Publication (reg 19) to Submission	Submitted	Months from Submission to Found Sound	Found Sound	Adopted
25	Gedling Borough Council	Jun-12		Jun-13		Jul-14	17-Sep-14
26	Nottingham City Council	Jun-12		Jun-13		Jul-14	17-Sep-14
27	Gravesham Borough Council	Dec-12		May-13		Jul-14	30-Sep-14
28	Rother District Council	Aug-11		Jul-12		Jul-14	29-Sep-14
29	Allerdale District Council	May-13		Oct-13		Jul-14	16-Jul-14
30	Bath & North East Somerset Council	Dec-10		May-11		Jun-14	10-Jul-14
31	Stafford Borough Council	Jan-13		Aug-13		Jun-14	19-Jun-14
32	Rotherham Metropolitan Borough Council	Jun-12		Jun-13		Jun-14	10-Sep-14
33	Greenwich, Royal Borough of	Feb-13		Sep-13		May-14	30-Jul-14
34	Warrington Borough Council	May-12		Sep-12		May-14	21-Jul-14
35	Colchester Borough Council (Review)	Aug-13		Oct-13		May-14	01-Jul-14
36	East Hampshire District Council	Feb-12		May-12		Apr-14	08-May-14
37	Fenland District Council	Feb-13		Sep-13		Apr-14	08-May-14
38	Teignbridge District Council	Nov-12		Jun-13		Apr-14	06-May-14
39	Leicester City Council - Fast Track Single Policy Review	Sep-12		Nov-13		Mar-14	
40	Christchurch Borough Council	Apr-12		Mar-13		Mar-14	01-Apr-14
41	East Dorset District Council	Apr-12		Mar-13		Mar-14	28-Apr-14
42	Cannock Chase District Council	Feb-13		May-13		Feb-14	11-Jun-14
43	Reigate & Banstead District Council	Mar-12		May-12		Jan-14	03-Jul-14
44	Babergh District Council	Oct-11		Nov-12		Jan-14	25-Feb-14
45	Erewash Borough Council	Jun-12		Nov-12		Jan-14	06-Mar-14
46	Staffordshire Moorlands District Council	Dec-11		Sep-12		Jan-14	26-Mar-14
47	South Gloucestershire Council	Jun-10		Mar-11		Nov-13	11-Dec-13
48	Solihull Metropolitan Borough Council	Jan-12		Sep-12		Nov-13	03-Dec-13
49	Broadland District Council (Revision)	Aug-12		Feb-13		Nov-13	10-Jan-14
50	Norwich City Council (Revision)	Aug-12		Feb-13		Nov-13	10-Jan-14
51	South Norfolk Council (Revision)	Aug-12		Feb-13		Nov-13	10-Jan-14

	Local Council	Published	Months from Publication (reg 19) to Submission	Submitted	Months from Submission to Found Sound	Found Sound	Adopted
52	Chelmsford Borough Council (Review)	Nov-12		Apr-13		Oct-13	04-Dec-13
53	Hastings Borough Council	May-12		Oct-12		Oct-13	19-Feb-14
54	Copeland District Council	Apr-12		Oct-12		Sep-13	05-Dec-13
55	West Lancashire District Council	Aug-12		Oct-12		Sep-13	16-Oct-13
56	Wigan Metropolitan Borough Council	Feb-11		Sep-11		Aug-13	11-Sep-13
57	Ryedale District Council	Jan-12		May-12		Aug-13	05-Sep-13
58	Westminster, City of (NPPF Revision)	Jul-12		Jan-13		Aug-13	13-Nov-13
59	Dacorum Borough Council	Oct-11		Jun-12		Jul-13	25-Sep-13
60	Selby District Council	Jan-11		May-11		Jun-13	22-Oct-13
61	Chesterfield Borough Council	Feb-12		Sep-12		Jun-13	24-Jul-13
62	Shepway District Council	Jul-11		Jan-12		Jun-13	18-Sep-13
63	Suffolk Coastal District Council	Jan-12		May-12		Jun-13	05-Jul-13
64	Milton Keynes Council	Feb-10		Mar-11		May-13	10-Jul-13
65	Blaby District Council	Jan-12		Jun-12		Feb-13	21-Feb-13
66	Winchester City Council (inc South Downs NPA)	Jan-12		Jun-12		Feb-13	20-Mar-13
67	Croydon, London Borough of	Sep-11		Apr-12		Dec-12	22-Apr-13
68	Haringey, London Borough of	May-10		Mar-11		Dec-12	18-Mar-13
69	Hertsmere Borough Council	Nov-11		Feb-12		Dec-12	16-Jan-13
70	Eastbourne Borough Council	Sep-11		Jan-12		Nov-12	20-Feb-13
71	Watford Borough Council	May-11		Feb-12		Nov-12	30-Jan-13
72	Purbeck District Council	Nov-10		Jan-12		Oct-12	13-Nov-12
73	Wealden District Council	Feb-11		Aug-11		Oct-12	28-Nov-12
74	South Oxfordshire District Council	Dec-10		Mar-11		Oct-12	13-Dec-12
75	South Staffordshire District Council	Mar-11		Sep-11		Oct-12	11-Dec-12
76	Halton Borough Council	Nov-10		Sep-11		Oct-12	12-Dec-12
77	St Helens Metropolitan Borough Council	Jan-11		May-11		Oct-12	31-Oct-12
78	Mid Suffolk District Council Focussed Review	Jan-12		Mar-12		Sep-12	20-Dec-12
79	Bournemouth Borough Council	Aug-11		Nov-11		Aug-12	30-Oct-12

	Local Council	Published	Months from Publication (reg 19) to Submission	Submitted	Months from Submission to Found Sound	Found Sound	Adopted
80	Hillingdon, London Borough of	Feb-11		Oct-11		Jul-12	08-Nov-12
81	Woking Borough Council	Jul-11		Dec-11		Jul-12	25-Oct-12
82	Taunton Deane Borough Council	Jul-11		Nov-11		Jul-12	11-Sep-12
83	West Berkshire District Council	Apr-10		Jul-10		Jul-12	16-Jul-12
84	Barnet, London Borough of	Sep-10		Aug-11		Jun-12	11-Sep-12
85	Chorley Council	Dec-10		Mar-11		Jun-12	17-Jul-12
86	Preston Borough Council	Dec-10		Mar-11		Jun-12	05-Jul-12
87	South Ribble Borough Council	Dec-10		Mar-11		Jun-12	18-Jul-12
88	Doncaster Metropolitan Borough Council	Mar-11		Jul-11		Mar-12	18-May-12
89	Manchester City Council	Feb-11		Jul-11		Mar-12	11-Jul-12
90	North Somerset Council	Feb-11		Jul-11		Mar-12	10-Apr-12

Appendix B: Glossary and list of Acronyms

Term	Acronym	Explanation and further information
Call for Sites	-	Part of Stage 1 of the PPG methodology for Housing and Economic Land Availability Assessments. Sites submitted are then assessed using the methodology set out in Stage 2-5 of the PPG.
Co-Operation for Sustainable Development Group	Co-Op Group	The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.
Development Plan Development	- DPD	Plans with legal force forming strong material considerations in the assessment of planning applications. Includes adopted Local Plans, Neighbourhood Plans, waste and Minerals Plans, and other DPDs, as defined in section 38 of the Planning and Compulsory Purchase Act 2004. Documents produced by the Local Planning Authority
Plan Document		and forming part of the Development Plan.
Duty to Co- Operate	DtC	The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters. See NPPF paragraphs 178-181.
Essex Planning Officers Association	EPOA	Grouping of Planning Officers in Essex.
Engagement	-	A key NPPF term applied to constructive interaction between the Council and the community (paragraph 155), and the Council and stakeholders including duty-to-co-operate bodies (paragraph 181) in preparation of a Local Plan: "cooperation should be a continuous process of engagement from initial thinking through to implementation"
Five-year Housing Land Supply	-	LPAs should "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements" (NPPF Paragraph 47). If the LPA cannot demonstrate a five-year supply, the

Term	Acronym	Explanation and further information
		presumption in favour of sustainable development
0 0 1		applies (NPPF Paragraph 49)
Green Belt	-	See NPPF paragraphs 79 to 92. A small part of
		Uttlesford District west of the M11 is designated
		Green Belt. Green Belts may be amended through a review of a Local Plan. See also PAS Guidance on
		Green Belt.
Greenfield	_	Undeveloped land. See also Brownfield.
Functional	FEMA	According to the PPG: "The geography of commercial
Economic		property markets should be thought of in terms of the
Market Area		requirements of the market in terms of the location of
		premises, and the spatial factors used in analysing
		demand and supply – often referred to as the
		functional economic market area. Since patterns of
		economic activity vary from place to place, there is no
		standard approach to defining a functional economic
		market area, however, it is possible to define them
		taking account of factors including:
		•extent of any Local Enterprise Partnership within the
		area; •travel to work areas;
		•housing market area;
		•flow of goods, services and information within the
		local economy;
		•service market for consumers;
		•administrative area;
		Catchment areas of facilities providing cultural and
		social well-being;
		•transport network."
		Planning Practice Guidance, Paragraph: 012
0	COT	Reference ID: 2a-012-20140306
Gypsies and Travellers	G&T	See PPTS.
Housing	HMA	According to PPG: "A housing market area is a
Market Area		geographical area defined by household demand and
		preferences for all types of housing, reflecting the key
		functional linkages between places where people live
		and work. It might be the case that housing market
		areas overlap.
		The extent of the housing market areas identified will
		vary, and many will in practice cut across various local planning authority administrative boundaries. Local
		planning authorities should work with all the other
		constituent authorities under the duty to cooperate.
		Where there is a joint plan, housing requirements and
		the need to identify a five year supply of sites can
		apply across the joint plan area. The approach being
		taken should be set out clearly in the plan."
Infrastructure	IDP	According to the PPG: "The Local Plan should make

Term	Acronym	Explanation and further information
Delivery Plan		clear, for at least the first five years, what
or Programme		infrastructure is required, who is going to fund and
Criticg.commit		provide it, and how it relates to the anticipated rate
		and phasing of development. This may help in
		reviewing the plan and in development management
		decisions. For the later stages of the plan period less
		detail may be provided as the position regarding the
		provision of infrastructure is likely to be less certain. If
		it is known that a development is unlikely to come
		forward until after the plan period due, for example, to
		uncertainty over deliverability of key infrastructure,
		then this should be clearly stated in the draft plan.
		then this should be clearly stated in the draft plan.
		Where the deliverability of critical infrastructure is
		uncertain then the plan should address the
		consequences of this, including possible contingency
		arrangements and alternative strategies. The detail
		concerning planned infrastructure provision can be set
		out in a supporting document such as an infrastructure
		delivery programme that can be updated regularly.
		However the key infrastructure requirements on which
		delivery of the plan depends should be contained in
		the Local Plan itself." Paragraph: 018 Reference ID:
		12-018-20140306
Local	LDS	A schedule showing proposed planning policy
Development		documents. Required under Section 15 of the
Scheme		Planning and Compulsory Purchase Act 2004.
Material	-	According to the PPG: "A material planning
Consideration		consideration is one which is relevant to making the
		planning decision in question (e.g. whether to grant or
		refuse an application for planning permission).
		The scope of what can constitute a material
		consideration is very wide and so the courts often do
		not indicate what cannot be a material consideration.
		However, in general they have taken the view that
		planning is concerned with land use in the public
		interest, so that the protection of purely private
		interests such as the impact of a development on the
		value of a neighbouring property or loss of private
		rights to light could not be material considerations."
		Paragraph: 008 Reference ID: 21b-008-20140306
Members	-	Members of the District Council. Also known as
		Councillors. There are 39 elected Members of
		Uttlesford District Council. Full Council (meetings
		open to all Members) and Cabinet constitute the main
		decision-making bodies of Uttlesford District Council,
N. d.	NDDD	and will decide on the Local Plan.
National	NPPF	Sets out government's planning policies for England

Term	Acronym	Explanation and further information
Planning		and how these are expected to be applied. The
Policy		framework acts as guidance for local planning
Framework		authorities and decision-takers, both in drawing up
		plans and making decisions about planning
		applications. It is based on the Planning and
		Compulsory Purchase Act 2004.
Neighbour-	NDP	http://planningguidance.planningportal.gov.uk/ A plan prepared by a Parish or Town Council. Upon
hood	INDI	adoption, NDPs become part of the Development Plan
Development		alongside the Local Plan. See NPPF Paragraphs 183-
Plan		185.
Officers	-	Staff employed by the District Council.
Objectively	OAN	Key term used in the NPPF (Paragraphs 14, 17, 47,
Assessed		182). Most commonly refers to housing needs
Need		(including Gypsies and Travellers), but also refers to
		other policy areas including jobs and infrastructure.
		The approved methodology for establishing a housing
		OAN is set out in the NPPF and PPG. See also
Planning	PAS	SHMA.
Advisory	PAS	PAS is a DCLG grant-funded programme but part of the Local Government Association: "PAS exists to
Service		provide support to local planning authorities to provide
CCIVIOC		efficient and effective planning services, to drive
		improvement in those services and to respond to and
		deliver changes in the planning system". See website
		at <u>www.pas.gov.uk</u>
Planning	PINS	The Planning Inspectorate deals with planning
Inspectorate		appeals, national infrastructure planning applications,
		examinations of local plans and other planning-related
		and specialist casework in England and Wales.
		The Planning Inspectorate is an executive agency, sponsored by the Department for Communities and
		Local Government.
Planning	PPTS	National planning policy on Gypsy, Traveller, and
Policy for	1110	Travelling Showpeople. Published separately from,
Traveller Sites		but at the same time as, the NPPF, in March 2012.
Planning	PPWG	Members of Uttlesford District Council all-party group
Policy Working		chaired by the Leader of the Council. Main purpose of
Group		the group is to oversee progress with the Local Plan
		and technical work carried out by Officers. All agendas
		and minutes of the group are published on the
		Council's website. The Working Group acts in an
		advisory and scrutiny capacity and makes
		recommendations to Full Council (see <i>Members</i>) but does not itself have decision-making powers.
Planning	PPG	Online guidance published and updated by DCLG
Practice		alongside the NPPF. The guidance forms a strong
Guidance		material consideration in plan-making and decision-
		taking.
		taning.

Term	Acronym	Explanation and further information
		http://planningguidance.planningportal.gov.uk/
Regulations,	-	The Town and Country Planning (Local Planning)
('the regs')		(England) Regulations 2012. The Regulations set out
		the procedure to be followed by local planning
		authorities in relation to the preparation of local plans
		and supplementary planning documents, including as
		to consultation with interested persons and bodies and
		the documents which must be made available at each
		stage. Sets out 'Specific Consultation Bodies' and
		'Duty to Co-Operate Bodies'.
		http://www.legislation.gov.uk/uksi/2012/767/contents/
		<u>made</u>
Presumption in	-	NPPF Paragraph 14: "At the heart of the National
Favour of		Planning Policy Framework is a presumption in favour
Sustainable		of sustainable development, which should be seen as
Development		a golden thread running through both plan-making and
		decision-taking. For plan-making this means that:
		local planning authorities should positively seek
		opportunities to meet the development needs of their
		area;
		Local Plans should meet objectively assessed
		needs, with sufficient flexibility to adapt to rapid
		change, unless:
		 any adverse impacts of doing so would
		significantly and demonstrably outweigh the
		benefits, when assessed against the policies in
		this Framework taken as a whole; or
		specific policies in this Framework indicate development about the restricted [Footpate 0].
		development should be restricted [Footnote 9].
		Footnote 9: "For example, those policies relating to
		sites protected under the Birds and Habitats Directives
		(see paragraph 119) and/or designated as Sites of Special Scientific Interest; land
		designated as Green Belt, Local Green Space, an
		Area of Outstanding Natural Beauty, Heritage Coast
		or within a National Park (or the Broads Authority);
		designated heritage assets; and locations at risk of
		flooding or coastal erosion."
Statement of	SCI	Sets out policy for involving the community in the
Community		preparation, alteration and review of planning policy
Involvement		documents and in deciding planning applications.
		Uttlesford District Council's SCI was adopted on
		DATE and is available at www.uttlesford.gov.uk/sci
Strategic	SHMA	Requirement of Paragraph 159 of the NPPF. LPAs
Housing		should <i>"prepare a Strategic Housing Market</i>
Market		Assessment to assess their full housing
Assessment		needs, working with neighbouring authorities where
		housing market areas cross administrative
		boundaries."

Term	Acronym	Explanation and further information
Soundness	-	Four tests of soundness of Local Plans contained within the NPPF (paragraph 182). Plans should be positively prepared, justified, effective, and consistent with national policy.
Stakeholder	-	Key stakeholders include: statutory consultees, infrastructure delivery bodies, major landowners, housebuilders and other developers, and duty-to-co-operate bodies. (See PAS Good Plan-Making Guide Paragraph 5.6).
Statutory Consultees	-	Bodies listed in the Regulations as bodies which must be consulted on the draft Local Plan.
Sustainable Development	-	According to the NPPF (Paragraph 6), this is the purpose of the planning system, and includes three mutually dependent dimensions: economic, social, and environmental. See also <i>Presumption in Favour of Sustainable Development</i> .
Sustainability Appraisal (SA)	SA	A systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
Strategic Environmental Assessment	SEA	Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004(commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment.
Strategic Housing Land Availability Assessment	SHLAA	Requirement of Paragraph 159 of the NPPF. LPAs should: "prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."
Vision	-	NPPF requirement for Local Plans and a key part of the engagement process: "A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made." (Paragraph 155)