



Public Document Pack

Uttlesford District Council

Chief Executive: Peter Holt

Local Plan Leadership Group: Extraordinary Joint Session with the Scrutiny Committee

Date: Monday, 10th October, 2022

Time: 7.00 pm

Venue: Council Chamber - Council Offices, London Road, Saffron Walden,
CB11 4ER

Chair (LPLG): Councillor G Bagnall

Members (LPLG): Councillors M Caton, R Freeman, M Lemon, B Light, J Lodge,
S Merifield, R Pavitt (Vice-Chair), N Reeve, M Sutton and
M Tayler

Guest Members Councillor N Gregory (Chair)

(Scrutiny Committee): Councillors C Criscione, G Driscoll, V Isham, R Jones, P Lavelle,
G LeCount (Vice-Chair), S Luck, G Sell and J De Vries

Public Participation

At the start of the meeting there will be an opportunity for up to 10 members of the public to ask questions and make statements subject to having given notice by 2pm the working day before the meeting. Each speaker will have 4 minutes to make their statement. Please write to committee@uttlesford.gov.uk to register your intention to speak with Democratic Services.

Public speakers will be offered the opportunity for an officer to read out their questions or statement at the meeting, or to attend the meeting over Zoom to readout their questions or statement themselves

Members of the public who would like to watch the meeting live can do so [here](#). The broadcast will be made available as soon as the meeting begins.

**AGENDA
PART 1**

Open to Public and Press

1 Apologies for Absence and Declarations of Interest

To receive any apologies and declarations of interest.

2 Local Development Scheme (Local Plan Regulation 18 Consultation)

4 - 13

To consider the Local Development Scheme (Local Plan Regulation 18 Consultation) report.

For information about this meeting please contact Democratic Services

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Agenda Item 2

Committee:	Local Plan Leadership Group, Joint Session with the Scrutiny Committee	Date: Monday 10 October 2022
Title:	Local Development Scheme (Local Plan Regulation 18 Consultation)	
Portfolio Holder:	Councillor John Evans, Portfolio Holder: Planning, the Local Plan, Stansted Airport and Infrastructure Strategy	
Report Author:	Dean Hermitage – Director of Planning & John Clements, Interim Local Plan and New Communities Manager	Key decision: No

Summary

1. The Council is progressing work on a new Local Plan and was due to consult on its Regulation 18 'Preferred Options' document ("Reg.18") in November 2022. The production of this document is delayed. It is therefore recommended that The Local Development Scheme (LDS), which sets out the draft timetable for producing the Local Plan, is amended to reflect this.

Recommendations

2. That the committee(s):
 - a. Recommend Cabinet adopt the revised LDS of the Local Plan and note other actions being taken.
 - b. That LPLG and Scrutiny agree a new, closer alignment of their oversight of the Local Plan from the options set out in paragraph 21 and accordingly make a recommendation to Cabinet/full Council so that any consequential changes can be made.

Financial Implications

3. The approved budget for the Local Plan in 2022-23 includes sufficient provision for the work needed through to the end of March 2023. Adequate provision will need to be made in preparing the budgets for 2023-24 and 2024-25 in the revised Medium Term Financial Strategy.
4. The proposed changes to the timetable will extend the period for which the district is at risk of speculative development, and this will extend the period during which the Council is likely to face further appeals.

Background Papers

5. No additional papers were referred to by the author(s) in the preparation of this report.

Impact

6. See table:

Communication/Consultation	The draft timetable includes for wide public and stakeholder consultation.
Community Safety	No impact
Equalities	No impact
Health and Safety	No impact
Human Rights/Legal Implications	Preparation of a local plan is a statutory duty. It needs to meet legal tests and comply with regulations.
Sustainability	N/a
Ward-specific impacts	All
Workforce/Workplace	N/A

Situation

7. The Council started work on a new Local Plan in 2020. The Local Development Scheme (LDS) sets out the draft timetable for producing the Local Plan. The existing LDS included for a Reg.18 consultation from November to December 2022 with a Regulation 19 consultation (final public consultation) from November to December 2023. It proposed the submission of the Regulation 19 plan (our final draft) to Government in May 2024.
8. The publication of a Reg.18 Local Plan consultation document this November was aborted as it had become apparent to senior officers that, despite strenuous efforts by the Local Plans team, the intended document could not be completed to an acceptable standard within target timescales.
9. To continue the established programme with a relatively short delay was explored but found to be unfeasible, not least due to the timetable constraints on consultation and governance leading up to and during next May's Council elections (for which the pre-election – 'purdah' – period begins on 23 March).
10. It is therefore proposed to **schedule a post-local election Reg.18 consultation, early summer 2023**. Key dates are being developed and will follow as an addendum (*Appendix 2: Revised Local Development Scheme – to follow*).

11. It is proposed instead to use the additional time to produce a more focused, accessible and effective form of consultation document, address perceived shortcomings in some of the current content, and further develop and integrate the evidence required to support the plan. This 'Draft Plan' should make consultation more effective, and in various ways progress the Council further towards what is the most crucial step in the process; the Regulation 19 submission of a completed and sound 'final' plan for examination. In this way the overall delay to that final stage, currently estimated at three to four months, is less than the delay to the more immediate Regulation 18 consultation (i.e. whilst the Reg.18 consultation would be pushed back some six months, it does not follow that the overall plan adoption date is delayed by the same period).

Revised Regulation 18 Document

12. As the Reg.18 consultation will now need to be held over until after the May 2023 elections, there is the opportunity to produce a document in which the draft proposals in it are clearer, and significantly more developed in terms of thinking, evidence, and justification. A more succinct and readable document is proposed, which can support more effective engagement of the public and other interested parties, and hence more usable feedback and evidence to inform the 'final' Regulation 19 submission Local Plan.
13. The new Reg18 consultation will build on work undertaken to date (which has not been abortive work), and develop it such that:
- the overall spatial strategy will be further developed and clarified
 - strategic choices will be more clearly distinguished and their rationale explained
 - the site selection process (a key criticism of emerging proposals to date) will be re-run to more rigorous standards, potentially resulting in different and more robustly justified, proposed site allocations
 - proposed development management policies will be more refined, effective and readily understandable and,
 - questions to consultees will facilitate their response to options not favoured by the Council, as well as those proposed to be carried forward, to make it clear to all that while it has made provisional choices, the Council has not closed its mind to further changes and improvements before the local plan is finalised.

Changes to Approach

14. Clearly, lessons need to be learnt going forward, and a repeat of the problems, and especially the late discovery of the consultation document's unreadiness, must be avoided in future. Preliminary investigation suggests that the need for delay is not the result of any lack of hard work and ambition on the part of the Local Plans Team staff, but rather includes -

- i. a lack of integration between different workstreams, much exacerbated by remote working
 - ii. a high turnover of staff (both within the team and the management above it) and at short notice, leading to loss of continuity and of consistency in completing tasks, and significant losses of local knowledge and understanding of the evolution of proposals
 - iii. a lack of clarity of thinking, and shared team understanding, of the nature of the consultation document and the status of 'options' within it
 - iv. misguided responses to pressure - e.g. rushing to complete tasks when the groundwork has not been completed; pace of programme meaning team members' concerns and suggestions being treated as a distraction from completing tasks; lack of detailed reporting on emerging (and inherent) problems.
 - v. engagement between officers and members not undertaken efficiently, resulting in additional time-consuming tasks being undertaken.
15. Measures have already been put in place, and further measures are being developed, to address these issues. These changes must be sustained and the situation monitored to ensure that improvements are achieved and maintained.
16. These include –
- i. greater collaborative working practices, including regular, structured in-office team meetings. All Local Plan staff will be expected to attend. This includes the Director.
 - ii. the wider Planning Service staffing review includes a greater focus on staff learning & development; investing in staff to encourage staff retention. Revising job descriptions to include increased notice periods (e.g. the incoming Local Plan Manager's notice period will be increased from two to three months).
 - iii. ensuring all members of the Local Plan team have a shared understanding of UDC's aspirations, and do not just focus on delivering a document to a timetable.
 - iv. a far more tightly structured work programme, with elements broken down into bitesize tasks, to enable definitive progress to be monitored on regular basis; and promoting a culture of open communication and 'no-blame'.
 - v. establishing clear parameters at each stage of the process with elected Members, ensuring that the required aims of each officer – member meeting are clearly set out and outcomes clearly recorded.

17. Measures have already begun to address some of these issues. A more proactive and critical *esprit de corps* will take time to foster. Further measures will be developed and sustained to foster this.
18. It is accepted that much of the background, technical work supporting local plan production is undertaken by external consultants. External contracts are carefully chosen and managed, however there is less control over the pace of externally contracted work than work in-house. Consultants are often working for numerous local authorities and are experiencing staffing issues in some fields.

Timetable and Governance

19. The governance timetabling has to be built around the May 2023 elections, the pre-election period leading up to it, and the period following it, within which the Council appoints its portfolio-holders and committees.
20. In advance of the pre-election period, which commences 23 March 2023, a series of monthly meetings, alternating between **Local Plan Leadership Group** (public meeting) and Local Plan Working Group (non-public meeting) is proposed (see table below), to consider and guide the developing work on the consultation document.
21. It is equally important to maintain Member-level oversight of the project management of the process, which has been provided to date separately through Scrutiny Committee, whilst addressing concerns about either a gap or overlap between responsibilities of these separate Member bodies. Going forward it is considered we must ensure that both sets of Member oversight are fully aligned, which would also give Officers the space to focus on continued delivery in between reporting to Committees which would no longer be on a misaligned timetable. This can be achieved by one of the two following options; to be agreed by the Chairs of the two committees in consultation with senior officers:
- Option A - Scrutiny meeting on the same day for 30 minutes immediately prior to each LPLG meeting to consider project management updates
 - Option B - Scrutiny passes over the responsibility for oversight of project management to LPLG

DATE	MEETING	PURPOSE	INDICATIVE AGENDA
Nov 10 th	LPLG	<ul style="list-style-type: none"> ▪ Agree way forward and making recommendation to Cabinet 	<ul style="list-style-type: none"> ▪ Agree detailed programme, milestones / targets up until March 2023. ▪ Agree method for Review of Site Assessments ▪ Compilation of Previous Draft DM Policies ▪ Draft Introduction Chapter
Dec 6 th	LPWG	<ul style="list-style-type: none"> ▪ <i>Review and steer work to date</i> 	<ul style="list-style-type: none"> ▪ <i>Verbal update on progress</i>

			<ul style="list-style-type: none"> ▪ <i>Presentations on Site Assessment Considerations</i> ▪ <i>Review of Outline of Spatial Strategy</i>
Jan 9th	LPLG	Review Progress and making recommendation to Cabinet	<ul style="list-style-type: none"> • Progress Update • Examples of site assessments • Further elements, tbc, of plan contents
▪ <i>Feb 20th or 23rd tbc</i>	<i>LPWG</i>	▪ <i>Review and steer work to date</i>	<ul style="list-style-type: none"> ▪ <i>Verbal update on progress</i> ▪ <i>Review of Outline of Spatial Strategy</i>
▪ w/c Mar 6th or 13th	LPLG	Review Progress and making recommendation to Cabinet	<ul style="list-style-type: none"> • Progress Update • Spatial Strategy Chapter • Revised DM Policies • Further elements, tbc, of plan contents

22. A project plan is being prepared to support the proposed timetable. Agreement for the project plan will be sought at the LPLG(/Scrutiny) meeting on 10 November 2022.

23. Following the election and confirmation of the political administration post-May, a compressed governance timetable is suggested for the purpose of approving (or otherwise) the Draft Plan document that will have been completed, in the light of earlier LPWG guidance, during the pre-election period.

24. Meeting dates for the next municipal year are not yet confirmed. The Director for Planning will request to meet with lead members and Democratic Services to scope an LPLG, Scrutiny, Cabinet and Full Council meeting cycle immediately after committees are appointed post-election.

25. Changing the Local Plan timetable is a common occurrence in Local Planning Authorities across the country, due to the complexities and uncertainties involved (the Planning Officers Society has very recently commented that this is currently occurring at a particularly high level for various reasons). It is nonetheless fully appreciated that changes and delay cause frustration for all interested parties, and that successive changes are particularly regrettable.

26. The current Risk Register and is appended to this report as *Appendix 1*.

Risk Analysis

27. See table:

Risk	Likelihood	Impact	Mitigating actions
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The proposed changes to the timetable extend the period for which the district is at risk of speculative development	4 – there will be a longer time before a Local Plan is adopted	2 – the longer time period before which a Local Plan is adopted will mean the district is at risk of speculative development for longer	A more robust Reg18 allows for a better case to be put for the plan at examination. Similarly, it will help UDC ‘make up’ the time between the regulation 18 and regulation 19 consultations.
That the timetable proposed in the LDS slips	1 – there are unknown factors in the production of a Local Plan that require consideration and may result in slippage	4 – government intervention would significantly damage the reputation of the Council	The project plan supporting the LDS is actively managed by the Council’s Scrutiny Committee with work presented to and monitored by LPLG in a more structured manner.
That the government introduces a new system for producing Local Plans	4 – the Levelling Up and Regeneration Bill includes some significant changes	3 – the changes currently proposed could result in a radically different Local Plan	The Council will monitor further consultation and changes.

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.

Appendix 1: Risk Register

Appendix 2: Revised LDS Timetable (to follow)

ID REF.	DATE RAISED	RISK DESCRIPTION	RISK SCORE			MITIGATION MEASURES	AFTER RISK MITIGATION			ASSIGNED OFFICER	STATUS	UPDATES & COMMENTS	COMPLETE DATE
			LIKELIH OOD	IMPACT	TOTAL SCORE		LIKELIH OOD	IMPACT	TOTAL SCORE				
1	24.08.20	Insufficient Resources to complete the plan	4	5	20	Effective project plan, approved budget and successful bids for external funding.	1	5	5	Dean Hermitage	open	New comment:: Publication of a Reg.18 consultation document did not occur in early September as planned, and hence the previous project plan has been found wanting. A new project plan, to a revised timetable, is in urgent	
2	24.08.20	Insufficient capacity and lack of skills to complete the plan	4	5	20	Skills audit, management fo resource, training programme and recruitment of any additional staff	4	5	20	Dean Hermitage	open	New Comment: An interim Local Plans Manager has been in post for around 4 weeks. Two other team members have since resigned. One has already effectively left, but an interim replacement has been appointed with effect from 3rd October. Anothe (Ben Kennedy, who has respoonsibility for some items on this register) will leave in October, and measures to appoint a successor put in train, but this is likely to take significantly longer and it will also have an effect on the team budget.	
3	24.08.20	Evidence base flawed, incomplete or not up to date	3	5	15	Effective project management and governance	5	5	5	John Clements	open		
4	24.08.20	Failure of community engagement to inform decision making	4	5	20	Approved project plan and effective project management	1	5	5	John Clements	open		
5	24.08.20	Failure of DtC with stakeholders and statutory consultees	3	5	15	Effective project management and governance	1	5	5	John Clements	open		
6	24.08.20	Failure to address corporate vision and objectives	2	5	10	Effective governance and project management	1	5	5	Dean Hermitage	open		
7	24.08.20	Plan is unsound due to failure to comply with statutory requirements	4	5	20	Effective project management and project leadership	2	5	10	John Clements	open		
8	24.08.20	Preparation of the plan is delayed or slow and overtaken by events	4	5	20	Effective project management and governance	5	5	20	John Clements	open	New comment: Publication of a Reg.18 consultation doument did not occur in early September as planned, and hence the previous project management and governance arrangements have been found ineffective. A new project plan, to a revised timetable, is in urgent preparation and will be presented in outline to the Scrutiny Committee.	
9	24.08.20	The plan will not address the full impact of economic and social change arising from Covid 19	4	5	20	Develop evidence base and ensure effective community engagement	1	5	5	John Clements	open	New comment: Currently risks to the project from Covid 19 appear to have fallen to a level more akin to other economic and social change factors which affect the the plan and its preparation. Hence scoring has been reduced for this risk.	
10	24.08.20	The plan will fail to secure community benefit through lack of land value capture or public investment	4	5	20	Develop methodology including effective negotiations and funding bids	3	5	15	John Clements	open		
11	24.08.20	Failure to convince inspector that housing land supply is sufficient	4	5	20	Prepare sound housing land policies based on evidence	3	5	15	John Clements	open	New comment: Ongoing challenges to both current and future housing supply, not least from the expected economic downturn but also other factors, warrant a higher rating for this risk	
12	24.08.20	Applications being granted on appeal undermine emerging strategy	5	5	25	Planning policy and development management to liaise closely in the determination of application and dealing with any subsequent appeals	3	5	15	Dean Hermitage	open	New Comment: LP officers asked barristers to review the recent appeal decision on Warish Hall due to the sensitive issue around CPZ to advise on implications on the emerging options ahead of the 2nd LPLG member mini workshop in September.	
13	24.08.20	Social distancing and the impact of Covid 19 will undermine the effectiveness of community engagement	3	5	15	Prepare a community engagement programme that takes social distancing into account.	1	5	5	John Clements	open		

14	24.08.20	National changes to the plan making system through Planning for Change undermine the local plan making process	3	5	15	Continuing to review proposals arising from White Paper, formal representations as required and ongoing project plan review	2	5	10	Dean Hermitage	open	at the current stage of LP, we still have to proceed with process. Need to keep under careful review, revised proposals from new SoS of DLUHC
15	24.08.20	Revised standard housing methodology leads to unacceptable and undeliverable housing numbers	5	5	25	Discussion and meeting with officials at DLUHC, formal representations and project plan review	2	5	10	Stephen Miles	open	
16	07.09.20	Devolution White Paper leads to administrative changes that undermine the LP making process	5	5	25	Engage in informal discussions with Stakeholders and respond to White Paper when published	2	5	10	Peter Holt	Open	Government publication for the regeneration levelling up bill may affect how the Local Plan is developed, need to monitor.
17	07.09.20	Loss of staff and or difficulty in recruiting people with the appropriate skills and experience	4	5	20	Training programme, effective HR procedures and recruiting measures	4	5	20	Dean Hermitage	Open	New comment: (See also ID 2 above.) The continuing resignations, vacancies and staff turnover, together with a very challenging recruitment market, warrant a raising of the rating of this risk.
18	07.09.20	Volume and nature of consultation responses unmanageable	4	5	20	Approved project plan and effective project management	1	5	5	Stephen Miles	Open	
19	07.09.20	Lack of capacity of Stakeholders to respond in an effective and timely manner	3	5	15	Approved project plan and effective project management	1	5	5	Stephen Miles	Open	
20	07.09.20	Unexpected events making call on corporate resources	5	5	25	Ability to modify project plan and resourcing to respond to unexpected events	3	5	15	Dean Hermitage	Open	New comment: The need to secure a replacement for one of the departing members of staff, and the retention of another also appointed via a secondment from the County, is likely to require a longer term commitment to the arrangement with potential budgetary impacts currently being explored. The rating for this risk has been raised accordingly.
21	07.09.20	Lack of political consensus	4	5	20	Establish LPLG with regular briefings and engagement with members	3	5	15	Dean Hermitage	Open	Update Comment: A mini workshop with LPLG members was held 05.09.22 to develop member understanding and in anticipation of the now aborted Consultation in November.
22	07.09.20	Inconsistencies arising between LP and NP's	3	4	12	Review emerging strategy in the light of provisions in NP's	3	4	12	John Clements	Open	
23	07.09.20	Problems with deliverability/viability of sufficient sites to needs/requirements	4	5	20	Effective site selection assessment and negotiation methodologies	3	5	15	John Clements	Open	New comment: In the light of concerns and criticisms of the site selection process to date, this element of the plan is being re-run with a more closely defined written methodology. Until this work is completed the availability of the previously assumed quantum and distribution of sites cannot be fully relied on, and therefore the rating of this risk has been raised
24	07.09.20	Legal challenge on proposed adoption	3	5	15	Effections project management and sound legal advice	1	5	5	Dean Hermitage	Open	
25	07.09.20	Impact of use classes order on Town Centres undermine spatial strategy	3	4	12	Review implications in preparing LP strategy	1	4	4	John Clements	Open	
26	07.09.20	Permitted development changes undermine spatial strategy	3	4	12	Review implications in preparing LP strategy	1	4	4	John Clements	Open	
27	07.09.20	Climate emergency and international agreements are not taken into account	3	5	15	Review implications in preparing LP strategy	1	5	5	John Clements	Open	
28	07.09.20	Implications of Brexit adversely affect economic and growth proposals in the LP	3	4	12	Review implications in preparing LP strategy	1	4	4	John Clements	Open	
29	08.10.20	Government Intervene to take over Local Plan Process	4	5	20	Approve LDS and deliver to approved timetable. Effective project management.	2	5	10	John Clements	Open	New comment: A further revision of the Local Development Scheme (LDS) will be required to reflect the revised timetable and arrangements currently being developed and is anticipated to be taken to the Cabinet for authorisation shortly. Officers have notified DLUHC of the departure from the current LDS, and will notify them of the new one in due course

30	08.10.20	Project Plan Document becomes corrupted	3	4	12	Follow protocol for backing up updated Risk Register and Project Plan	1	4	4	John Clements	Open		
31	05.11.20	Community Engagement is not effective due to technical platform issues	3	4	12	Pre- Event practice sessions.Host officer to be trained in technical support and deliver solutions during event	1	4	4	Hayley Coles	Open	Additional engagement platforms are being explored to generate wider interest, particularly the hard to reach demographics.	
32	25.11.20	Community Stakeholder Forum fails to make an effective contribution to the Issues and Options stage	4	5	20	Balanced membership of panel, clear operating rules and effective communications to encourage public participation with proactive support	2	5	10	Stephen Miles	Closed		19.05.21
33	13.01.21	Capacity constraints in the inhouse procurement team lead to delays in procurement	2	5	10	Consider additional procurement capacity to support multiple projects	1	5	5	Gordon Glenday	Closed		14.04.21
34	10.03.21	Extent and timing of evidence base work is not coordinated and delays the preparation of the plan or compromises its content	3	4	12	Effective Project Planning to coordinate evidence base work	3	4	12	John Clements	Open		
35	07.04.21	Failure to procure consultancy work to achieve evidence base work on time	4	5	20	Effective procurement processes and programmes	1	5	5	Simon Payne	Closed		06.12.21
36	07.04.21	Delays in making decisions during governance process results in failure to achieve agreed LP timetable.	4	5	20	Realistic programme and effective member management of governance decision making	3	5	15	Dean Hermitage	Open	Update Comment: A mini workshop with LPLG members was held 05.09.22 to develop member understanding and in anticipation of the now aborted Consultation in November. A programme of further LPLG meetings and LPWP workshops in the period between now and election purdah is currently in preparation, awaiting confirmation of identified potential dates.	
37	17.05.21	Failure to prepare the plan on the agreed timetable due to evidence base work not being completed or available on time.	5	4	20	Effective project management of key work streams	4	4	16	John Clements	Open	New comment: On the one hand the delayed timetable for the Reg. 18 consultation will facilitate the evidence being developed to a further extent before its publication, on the other hand the need to review the site selection process, and the resignation of the team's transport planner, are likely to add delays and challenges.	
38	19.05.21	Transport Evidence will not be available in time for the LP programme	5	5	25	Identification and introduction of mitigation measures to ensure that the evidence is available when needed.	4	5	20	Ben Kennedy	Open	New comment (JC): (see also ID Ref 37 above.) Continuity of transport evidence procurement and integration will be a challenge and heightened risk going forward as a result of the departure of the team's transport planner, Ben Kennedy, both in terms of a likely period of post vacancy but perhaps more crucially the loss of his detailed knowledge of the issues, locality and partner organisations in this field. Measures are being explored to mitigate these risks.	
39	18.08.21	Delays in uploading data onto GIS due to one person dependency	3	2	6	Availability of alternative resources to update GIS in a timely way.	2	2	4	John Clements	Open	Policy officer in weekly contact with GIS officer to coordinate work. Will ask consultant to support GIS mapping as plan B option.	
40	06.09.21	Delay to the preparation of the Reg 18 Local Plan due to site assessment work taking longer than expected	4	5	20	Project Manager to review options including re-timing without impact on programme	3	5	15	Simon Payne	Closed		06.12.21
41	13.09.21	Delays to Local Plan due to Officer time directed to new initiatives.	2	4	8	Management of expectations and work project around pressure for new policy initiatives	2	4	8	John Clements	Open	New comment: Given the current staffing and plan timetable challenges, there will need to be a renewed emphasis on resisting new initiatives where practicable, and also on suspending non-essential and other work streams where this will have relatively little impact.	
42	16.11.21	Negotiations with Promoters of larger development sites becomes complex and time consuming.	3	3	9	Management of process to minimise complexity and need for negotiations.	2	3	6	John Clements	Open	The MOU was discussed at the Developer Forum in March.	
43	19.11.21	Plan is found to be unsound because choice of proposed site not supported by the evidence base	4	5	20	Robust evidence base driving the selection of proposed sites.	2	5	10	John Clements	Open	New comment: As indicated above, the site assessment and selection process is to be re-run to more exacting standards. This will reduce the risk of being found unsound on this point.	
44	04.01.22	Additional round of Reg 18 or 19 stages needed, creating delays in the delivery of the Local Plan	3	5	15	Effective project management of key work streams	3	5	15	John Clements	Open	New comment: The currently reformulation of the nature and content of the next Reg. 18 consultation should reduce this risk.	