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Local Plan Peer Review

Uttlesford District
Council

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Improving the East

Uttlesford Local Plan

Date: 31 March 2020
Subject: Local Plan Peer Review
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Purpose

The Council commissioned the East of England Local Government Association (EELGA) to undertake a peer review in the light of the Local Plan Inspectors' letter of 10 January 2020 which followed the Stage 1 hearing sessions.

The EELGA peer review team was briefed to focus on the possibility and implications of repairing the plan or starting afresh. For clarity the team was not engaged to advise on the spatial strategy or policies contained in the Plan itself.

Recommendations

The Council to note the conclusion drawn from the Review Team's analyses is that against the continue route, withdrawal of the plan from the examination and preparing a new plan would add certainty and more value to the key themes of the Council's draft Corporate Plan. The key elements of such value creation being:

- i. To retain Council led democratic control over and governance of the plan making process.
 - ii. To conduct an open and transparent plan making process engaging with residents and taking account of their views. This is also a central objective of the National Planning Policy Framework, that states the Local Plan is the key to delivering sustainable development that reflects the vision and aspiration of local communities.
 - iii. To update and add to the existing evidence based plan, to include:
 - A reassessment of housing and employment assumptions.
 - A reassessment of infrastructure deficits and requirements.
 - Development for a net zero carbon future.
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1. Introduction

- 1.1 The Council commissioned the East of England Local Government Association (EELGA), to undertake a peer review in the light of the Local Plan Inspectors' letter of 10 January 2020, which followed the Stage 1 hearing sessions.
- 1.2 The EELGA peer review team was briefed to focus on the possibility and implications of repairing the plan or starting afresh and for clarity the team was not engaged to advise on the spatial strategy or policies contained in the Plan itself.

2. Review Methodology

- 2.1 The Peer Review included the following activities:
 - Desk top review of all key documents.
 - Research into good practice guidance including Planning Advisory Service materials.

- Questionnaire based consultation with all Members.
- Meeting with MHCLG officials.
- Interviews with relevant officers.
- Briefing to all Members.
- This report of review findings and conclusions.

3. Background Context: Local Plan and Plan Making

3.1 The context for local plans and plan making is set out in materials published by the Planning Advisory Service,¹ a service operated by the Local Government Association.

3.2 Having a robust Local Plan in place helps to:

- Move from plan making to place shaping, (spatial expression of corporate vision).
- Provide certainty for communities, developers and the Council.
- Focus the Council on delivery.
- Access more funding and attract investment.
- Manage conflict.
- Meet statutory responsibilities.

3.3 Plan making is about much more than housing numbers and spatial strategy, it is one of the most significant tools available to a district council.

3.4 A robust, evidence based and sound Local Plan for Uttlesford will enable:

- The delivery of a vision for a better place for communities and the environment.
- Provision of infrastructure and development that will be required over at least the next 15/20 years and beyond to achieve a zero carbon future.

3.5 Members have a responsibility and a vital leadership role to play in producing a robust Local Plan for their area that seeks buy in from all parties. The key challenge is to listen to the views and aspirations of their constituents and balance this with the evidence and professional advice in order to plan for and meet, the development needs of their area, in accordance with statutory responsibilities and national planning policy and guidance. The Planning system is about balance, conflict resolution and compromise. In the Uttlesford context for example, the rural nature of the District, the high value landscape characteristics and extensive heritage assets are vital components in any planning decision making and this should be reflected in local plan policy. However, it is also vital to plan to meet objectively assessed needs such that change, although inevitable, is carried out and managed in the most sensitive way possible.

3.6 An effective local plan is essential to these transactions and decisions as set out in the National Planning Policy Framework (NPPF):

*“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.*² and

In local plans, *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- Housing (including affordable housing), employment, retail, leisure and other commercial development.*

¹ Local Plan Making and the Councillor Role June 2019 www.pas.gov.uk

² NPPF para 15 MHCLG 2019

- b. *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).*
- c. *Community facilities (such as health, education and cultural infrastructure).*
- d. *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.*³

*“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.”*⁴

- 3.7 To achieve a sound plan it will be necessary to:
- Address the key priorities for the area
 - Plan positively
 - Develop a robust and credible evidence base
 - Co-operate with neighbouring areas
 - Focus on reasonable alternatives
 - Undertake comprehensive Sustainability Appraisal
 - Carry out effective stakeholder engagement
 - Ensure that proposals are viable (at plan level) and deliverable in practice.
- 3.8 Furthermore, to achieve a ‘sound’ plan in a timely manner also requires Member support for robust governance and processes and effective programme management in line with a realistic Council approved ‘local development scheme’.
- 3.9 There are serious implications / risks of not having an up to date Local Plan in place including:
- It may be difficult to maintain required the required 5 year housing land supply.
 - It may be difficult to meet the housing delivery test.
 - It may be difficult to resist unsuitable / unwanted development.
 - The application of the priority in favour of ‘sustainable development’ as set out in NPPF.⁵
 - Likelihood of increased ‘planning by appeal’.
 - The threat of Government intervention to remove plan making powers from a local planning authority (LPA) or other arrangements / mandates.
 - The lost opportunity to promote quality outcomes including good design, and high environmental standards.
 - The loss of local democratic control over decision making.
- 3.10 During the course of this commission the Secretary of State made a statement in the House of Commons and published a paper entitled ‘Planning for the Future’⁶; two particular proposals are of particular relevance and referred to later in this report. Firstly, that the Government intends to mandate all Local Planning Authorities to have a Local Plan in place by December 2023 and secondly that the calculation of objectively assessed need is to be reviewed. A Planning White Paper is to be published in the Spring.

4. The Inspectors’ Voices

- 4.1 In this section we have drawn together the main points made by the Inspectors’ in their letter of 10 January 2020; extracts from the letter are referenced with paragraph numbers in parenthesis. The Inspectors’ main points have been addressed in four sections; these are: the

³ NPPF para 20 MHCLG 2019

⁴ NPPF para 33 MHCLG 2019

⁵ NPPF para 11 MHCLG 2019

⁶ Planning for the Future MHCLG 12th March 2020

endorsed aspects of the plan, the Inspectors' main concerns, the Inspectors' advice on strategy and the Inspectors' critique of continue and withdraw.

4.2 The Endorsed Aspects of The Plan

The Inspectors were silent on 'aspects of the plan that would not require significant further work at this stage' (3). On this basis it is assumed the Inspectors are satisfied the plan is legally compliant, the duty to co-operate has been met and the objectively assessed need (OAN) is satisfactory. The latter point though is conditional as it would be necessary for the examination to consider changes in, say, new national household projections (due to be published in 2020), introduction of a new assessment methodology (proposed in a MHCLG post budget document, 'Planning for our Future').

4.3 The Inspectors' Main Concerns

Drawing together their concerns, the Inspectors concluded:

'The Garden Communities are insufficiently justified and have not been shown to have a reasonable prospect of being delivered as submitted. Consequently, as matters stand the strategy set out in the plan is unsound' (112).

4.4 The main components of this conclusion set out in letter paragraph 113 are:

i. The Sustainability Appraisal

As part of the assessment of reasonable alternatives, the Sustainability Appraisal did not consider a smaller number of garden communities, in combination with more housing in existing sustainable settlements, nor does it have regard to the Heritage Impact Assessment.

ii. The Garden Communities

- a. The lack of clear mechanisms to ensure Garden Community Principles will be met.
- b. The costs, viability and deliverability of the Rapid Transit System are uncertain and any benefits would be realised too late to help ensure the Garden Communities (at Easton Park and West of Braintree) would be sustainable places.
- c. Realistic infrastructure costs have not been established meaning it is uncertain whether the Garden Communities will be viable and developable.
- d. The Garden Communities at North Uttlesford, Easton Park and West of Braintree are flawed due to a raft of landscape and heritage impacts, highway improvements and assessment issues

iii. The Stepped Housing Delivery Trajectory

- a. The trajectory unreasonably delays addressing the housing affordability problem.
- b. The trajectory is overly optimistic as it relies on early completions in the Garden Communities.
- c. There is unlikely to be a 5 year housing land supply on adoption.

4.5 The Inspectors' Advice on Strategy

To arrive at a sound strategy, the Inspectors' (at 114 - 116) consider the Council:

- i. Would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help bolster the 5 year Housing Land Supply until the Garden Communities begin to deliver housing.
- ii. Delete one of the Garden Communities from the plan, the Inspectors suggest this should be North Uttlesford as it seems to have most barriers to its development and performs the least well against the Garden Community Principles.
- iii. Undertake an enormous amount of work (identified in the letter) to justify the ambitious Easton Park and West of Braintree allocations.

4.6 The Inspectors' Critique of Continue And Withdraw

Commenting on 'what if' the plan was continued; the Inspectors commented on three themes:

Evidence

- To address our concerns, the Council would have to prepare a very considerable amount of new work (119). This goes well beyond what could be reasonably addressed by main modifications to the plan (125) and would amount to its almost complete re-drafting (126).
- There is a risk that this additional material, and any further evidence that is produced, seeks to justify the strategy set out in the plan rather than informing the plan making process which is how it should be used (122).
- Any lengthy pause in the examination is likely to lead to the need to revisit the objectively assessed need for housing and other parts of the evidence base could also become out of date during this time (124).

Transparency

- New documents continue to be submitted without the opportunity for participants to comment (121).
- Continuing is likely to become protracted, procedurally challenging and extremely difficult for participants to engage with (123).
- There is no guarantee that this plan would be found sound at the end of that long and complex process (123).

Democratic control

- In concluding, the Inspectors stated, 'We believe that the key decisions to be made on the future of the Garden Communities and the spatial strategy need to be taken by the Council, in consultation with local residents. The most effective way to do this would be through the preparation of a new plan, based on a robust Sustainability Appraisal, rather than emerging as our recommendations in main modifications' (127).

5. Members' Voices

5.1 In this section we report Members' responses to a consultation involving a questionnaire survey and telephone conversations. The consultation addressed the key spatial, housing, infrastructure and quality of development issues raised by the Inspectors along with other specific issues of concern. Twenty two members responded by email and or over the phone. The responses were made in confidence on the basis the most commonly shared views would be reported in aggregate form. The responses are set out below as reported to and summarised by the Review Team without any commentary or judgement from the Team.

1. Priorities for The District Local Plan Over The Next 15 Years And Future Generations

Where expressed, the most common expressed vision for Uttlesford is one that:

- Protects and enhances the natural and built environment and heritage.
- Has thriving sustainable, net zero carbon communities.

Members were very clear their aspirations for the plan are for:

- Investment to address existing infrastructure deficits and future infrastructure requirements for sustainable transport, employment, education, health, social and community activities including sport and leisure.
- The right number of homes to meet people's needs by tenure (social, affordable and private), size (1,2,3 bed not just 5 bed executive homes) and location (close to jobs and services to reduce the need to travel).

2. Views on The Proposed Garden Communities Included In The Submitted Local Plan

Members' responses were consistent and clear; Garden Community principles are good in theory but may not be delivered in practice. On the latter point, Members expressed significant concerns about promoters' lack of commitment to the principles and the Council's abilities to assemble funding for and delivery of required advance strategic and site-specific infrastructure. A central concern was that the proposed developments would result in anonymous housing estates not the desired self-contained communities.

3. Views on How To Go About Finding Additional Sites In Town And Villages To Ensure And Maintain An Immediate 5 Year Supply Of Deliverable Housing Sites

At the strategic level, Members want to see a transparent, objective and evidence based assessment of sites informed by a comprehensive understanding of infrastructure pinch points and requirements.

At the operational level, Members want a search for sites that engages Town and Parish Councils and campaign groups. They also referred to the possibility of identifying sites from the 2015 call.

4. Views on Responses To The Inspectors' Letter

A small minority of the respondents want to retain the local plan in examination. These Members consider the benefits would be retention of the housing numbers (OAN), there is no alternative spatial strategy available and it would prevent a speculative 'free for all.'

A substantial majority of the respondents want to withdraw the local plan from the examination and start a new plan. The main benefits may be expressed as three opportunities:

- i. To conduct an open and transparent plan making process engaging with residents and taking account of their views.
- ii. To prepare an evidence based plan, to include:
 - A reassessment of housing and employment assumptions.
 - A reassessment of infrastructure deficits and requirements.
 - Development for a net zero carbon future.
- iii. To retain Council led democratic control over the plan making.

5. Views on Other Matters Relating To Preparation And Adoption Of A Sound Plan

Members highlighted four key challenges to preparing a sound local plan:

- i. Highway capacities and accesses: The small number of access points to the district from the major highways (M11 and A120) is subject to capacity issues.
- ii. Infrastructure: The requirements for advance infrastructure for new and existing communities, notably sustainable transport systems and existing deficits.
- iii. Value capture and bids: The institutional arrangements required to secure funding for infrastructure and hence the viability and deliverability of new development.
- iv. Residents' support: The reality that no one plan is going to satisfy everyone.

Members expressed a desire for a strengthened planning service as a whole. They want to see: a more open and responsive service culture; all Members having a better understanding of and engagement in the planning system and a higher standard of inputs from external consultants and advisers.

6. The Peer Team's Analyses

6.1 To help the Council make an informed response to the Inspectors' letter, we have:

- Analysed four factors mentioned as potentially significant in deciding whether to either continue with or withdraw the plan from examination. These are: Inspectors' advice; time, cost and housing numbers; spatial strategy; and transparency together with democratic control.

- Used the results of the above analyses to assess the additional value that each route could contribute to the plan as the spatial expression of the Council’s draft Corporate Strategy, notably its priorities for plan making, the plan and development outcomes.

6.2 Whose Choice? The Inspectors’ Advice

The Inspectors’ findings and critique of the continue and withdraw routes (117-128) led them to refer (at 117) to the Procedure Guide for Local Plan Examinations:

“As one of three outcomes of the examination, the Inspector finds the plan unsound and / or legally non compliant as submitted, and that it is not possible to make sound and legally compliant by making main modifications to it. In these circumstances the Inspector must recommend non adoption of the plan. In practice the local planning authority would be asked to consider withdrawing the plan before any such recommendation was made”⁷.

6.3 In their concluding remarks the Inspectors state:

“We are of the view that withdrawal of the plan from examination is likely to be the most appropriate option. We appreciate that this will not be the news the Council were hoping for and that you may need some time to reflect on the contents of the letter and to determine the preferred course of action” (128/9).

6.4 The Review Team’s reading of the letter is thus, that the Inspectors have not invited the Council to consider and make a choice between continue and withdraw. The Inspectors have taken the first step in the above procedure by inviting the Council to consider withdrawing the plan.

6.5 Time, Cost and Housing Numbers (Faster, Cheaper And Fewer)

Notwithstanding the question over the feasibility of continuing with the plan, this route is considered by some to have the merits of being faster and cheaper with fewer houses.

6.6 **Time:** In their critique (but not endorsement) of the continue route, the Inspectors estimated it would take between 1 and 2 years, possibly longer, to complete the necessary work and consult on it (124). Given the extent of technical work required and the preliminary work described below, our view is this route would at least take up to 2 years. This would be followed by the recommended hearings, the Inspectors’ report and adoption procedures.

6.7 The above timeline assumes an immediate start. In practice, the Council would face an uncertain start date due to two risks, summarised in Table 1, which may require the Council to withdraw the plan after some delay in any event.

Table 1 Risks attached to continuing the existing plan in examination

Continue	First risk Third party support	Yes: proceed No: withdraw	Second risk Inspectors’ support	Yes: proceed No: withdraw	Continue
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6.8 The first risk arises from a need to enlist the support of the Garden Community promoters and other third parties towards work required to produce a sound plan. To do this the relevant third parties would need to confirm mechanisms to secure the Garden Community Principles and commit to address the Inspectors’ related questions of landscape, heritage, sustainable transport, infrastructure and viability. The third parties concerned may or may not agree.

6.9 In the event of the Council receiving confirmations of support, the second risk would arise from a need to convince the Inspectors that continue was a viable and better alternative to

⁷ Procedure Guide for Local Plan Examinations (third bullet point paragraph 8 June 2019 5th Edition):

withdrawal and preparing a new plan. The North Essex case has been cited as a precedent under which the three Councils made a successful case to the Inspector to repair their local plan. However, this followed the Inspector's invitation to the Councils to consider three ways forward. The Uttlesford Local Plan Inspectors have set out the reasons why they have not extended such an invitation (117 – 128). If such an invitation had been extended, the Council would need to enter correspondence with the Inspectors. For the North Essex plan, the Councils took four months to make a successful case to continue. It is reasonable to conclude the Inspectors may remain unconvinced and maintain their current position. In which case significant time would have been lost that could have been committed to commencing a new plan.

- 6.10 Under the withdraw route it should be feasible to prepare a new plan within 4 years in line with the timescale set out by other local planning authorities. However, consideration may need to be given to dropping the Issues and Options Stage in order to meet the Government's recently announced proposal⁸ to require all LPAs to have up to date local plans in place by December 2023. At this stage we do not know how negotiable this deadline will be depending on individual circumstances.
- 6.11 To sum up, the start date, if at all, for the continue route would be in the hands firstly of third parties and secondly the Inspectors. The withdraw route would provide the certainty required by the Council to demonstrate its commitment to prepare a sound plan at the earliest possible time having regard to the Government's possible deadline of December 2023 or subsequent announcement in the forthcoming White Paper.
- 6.12 **Cost:** The comparative costs of the continue and withdraw routes presented at the member workshop of 04 February 2020 were based on recurring expenditure of £800k pa. This is in accordance with a continuing need for LPAs to keep plans under review with peaks and troughs in expenditure during plan making, for example peaks during the preparation of evidence and the hearings. In the event of the current plan being found sound (under the transitional arrangements), the Inspectors would – in line with current practice – be highly likely to insert a main modification for an immediate review. The purpose being to needs beyond the current plan date of 2032 / 33 and in the light of changed policy and guidance.
- 6.13 The Review Team's conclusion is that there would be no effective difference in costs between the two routes over the next four years.
- 6.14 **Housing numbers:** A further attraction of the continue route might be seen as the possibility of retaining existing numbers as calculated through the existing Objectively Assessed Need (OAN) and the fact this was not raised by the Inspectors as an issue following the initial hearings. For a new plan, officers have advised Members the application of the Government's standard methodology for calculating housing needs would result in an additional housing requirement capped at approximately 80 dwellings per annum. This number arose from the Council's last five year housing land supply calculation. However, this will change over time and will need to be kept under review. Furthermore, a new plan with a new plan period ending in, say, 2038 / 39 would involve allocations for an additional six years.
- 6.15 The existing housing number would be highly vulnerable to changing data and guidance during the rest of the plan making period. In the Inspectors words:

"Also, any lengthy pause in the examination is likely to lead to the need to revisit the objectively assessed need for housing (OAN). The OAN for Uttlesford is based on the Strategic Housing Market (SHMA) update 2017 which in turn is based on the 2014-based household projections. If new national household projections were to be published (due during 2020), it

⁸ Planning for the future MHCLG 12th March 2020

would be necessary for this examination to consider whether the change was meaningful, in line with the advice in the Guidance”.

- 6.16 Furthermore, Government in a recent document ‘Planning for the future’ has indicated that it intends to be:

*“reviewing the formula for calculating Local Housing Need – we will introduce a new approach which encourages greater building within and near to urban areas and makes sure the country is planning for the delivery of 300,000 new homes a year”.*⁹

- 6.17 In the event of the continue route being made available, it would be prudent for the Council to expect a requirement to recalculate the housing needs during the rest of plan making period. If the existing plan was adopted, the Inspectors would most likely require the Council to move immediately to a review to assess requirements for a new extended plan period. Finally, it should be noted the Inspectors would not view artificially restricting housing need as a good reason to choose a particular route.

- 6.18 The review team are aware that some Members have wished to explore whether the nature of the District is such that it could plead a special case for restricting the extent of housing development. In addressing the question, ‘is the use of the standard method for strategic policy making purposes mandatory?’ Planning Practice Guidance states:

*“No, if it is felt that circumstances warrant an alternative approach, but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and that any other method will be used only in exceptional circumstances”.*¹⁰

- 6.19 The Review Team are not aware of any case where this has applied to date and consider a very high bar would be set to justify ‘exceptional circumstances.’ In the unlikely event of success, the Council may well need to secure agreements with neighbouring authorities to take Uttlesford’s unmet need before the plan could be found sound.

- 6.20 The Review Team’s view is that the Council’s ability to hang on to the current housing numbers is too fragile a reason to inform decision making and pursuing ‘exceptional circumstances’ would most likely be a fruitless enterprise. Both causes would be unnecessary distractions from the urgent task of preparing a sound plan in a timely manner.

6.21 Spatial Strategy

In this section we have addressed the question: is there an alternative to the submitted strategy?

- 6.22 The Inspectors have concluded ‘as things stand the strategy set out in the plan is unsound’ (113). To arrive at a sound strategy, the Inspectors consider the Council should:

- Allocate more small and medium sized sites that could deliver homes in the short to medium term (114).
- Delete one of the Garden Communities, suggesting this should be North Uttlesford (115).
- Justify the ambitious allocations at Easton Park and West of Braintree (116).

- 6.23 The Inspectors added, ‘the work likely to be necessary goes well beyond what could be reasonably addressed by main modifications to the plan’ (125) and ‘changes necessary would amount to its almost complete re-drafting’ (126).

⁹ Planning for the Future para 10 MHCLG 12th March 2020

¹⁰ PPG Paragraph: 003 Reference ID: 2a-003-20190220

6.24 Our view is a new plan would result in a new spatial strategy in order to be found sound, this may or may not have some of the elements of the existing strategy but consideration at least would need to be given to more small and medium sized sites and fewer Garden Communities. As reported in Members' voices section 5.1 point 5 above, a new plan would present opportunities to take account of any new Council priorities and wider imperatives.

6.25 Whose Plan? Transparency and Control

A central concern contained in the National Planning Policy Framework is for planning to be open and transparent. In this context, the Inspectors raised the following concerns with the continue route:

- That new evidence base documents produced after submission of the plan 'should have informed the plan making process' (121).
- There is a risk that 'further evidence that is produced seeks to justify the strategy set out in the plan rather than informing the plan making process which is how it should be used' (122).
- It is 'especially problematic for local residents'... 'to keep track of and understand the large volume of material that has been submitted and continues to emerge' (122).

6.26 The Inspectors conclude, 'the most effective and transparent way to (make key decisions) would be through the preparation of a new plan' (127).

6.27 A significant difference between the continue and withdraw routes concerns control. Under the continue route, the Inspectors would be in control solely deciding on what main modifications to include. The Council would be reduced to preparing new evidence and proposing amendments and at the end of the process either agreeing or not to adopt the resulting plan as modified. Under the withdraw route, the Council would remain in control of the plan making process and content until submission for examination.

7. The Peer Review Team's Findings

7.1 The main findings from the analyses are as follows:

i. Whose Choice?

The Inspectors invited the Council to respond to their letter which makes a case for the Council to withdraw the plan. The Inspectors did not invite the Council to choose between alternative routes to produce a sound plan.

Notwithstanding doubt about the availability of the continue route we have assessed the additional value the continue and withdraw routes could add to the Council's priorities for plan making, the plan and development outcomes.

ii. Time, Cost and Housing Numbers (Faster, Cheaper and Fewer)

The analyses reveal there are weak grounds to justify support for the continue route. On time, continue would place the start date, if any, in the hands of third parties and the Inspectors. Withdraw would provide the certainty required to meet the Government's requirements for a possible deadline of December 2023.

On costs, it is the Review Team's view there would be no effective difference between the two routes over the next for four years.

On housing numbers, it is uncertain whether it would be possible to freeze the housing number in the current plan. Reflecting on the possible publication of new national household projections, the Inspectors predicted (at 124) that 'any lengthy pause in the examination is likely to lead to the need to revisit the objectively assessed need for housing (OAN).' Under the withdraw route, a new housing number would similarly need

to take account of any new household projections, as well as emerging methods of calculating the OAN and a longer plan period.

iii. Spatial Strategy

In the light of the Inspectors' comments, a plan under both routes would need to be different from that in the existing plan. Given a limit to changes to the existing plan within the reasonable scope of main modifications, a new plan would provide greater scope to extend and update the evidence base to include:

- A reassessment of housing and employment assumptions.
- A reassessment of infrastructure deficits and requirements.
- Development for a net zero carbon future.

iv. Whose Plan? Transparency and Control

In the Inspectors' words, 'key decisions to be made on the future of the Garden Communities and the spatial strategy need to be taken by the Council in consultation with local residents. The most effective and transparent way to do this would be through the preparation of a new plan...rather than emerging as our recommendations in main modifications' (127).

8. The Peer Review Team's Conclusion

8.1 The conclusion to be drawn from the Review Team's analyses is that against the continue route, preparing a new plan would add more certainty to the timetable and more value to the key themes of the Council's draft Corporate Plan. The key elements of such value creation being:

- i. To retain Council led democratic control over and governance of the plan making process.
- ii. To conduct an open and transparent plan making process engaging with residents and taking account of their views. This is also a central objective of the National Planning Policy Framework, which states the Local Plan is the key to delivering sustainable development that reflects the vision and aspiration of local communities.
- iii. To update and add to the existing evidence based plan, to include:
 - A reassessment of housing and employment assumptions.
 - A reassessment of infrastructure deficits and requirements.
 - Development for a net zero-carbon future.
