

### **Matter 3 Housing need and requirement**

*(Please note that housing needs for specific groups in the community (including older people and gypsies, travellers and travelling showpeople), and questions relating to affordable housing and overall housing supply and provision (including site allocations and delivery), are set out under later matters)*

**Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan’s approach to addressing some unmet housing needs for Gloucester soundly based?**

#### Housing need

The housing need for the District has been established through the Gloucestershire Local Housing Needs Assessment 2020 (LHNA) (EB10) using the standard methodology, as defined in national planning policy and guidance. This sets a baseline of 496 dwellings per annum (dpa) which, when adjusted to take account of affordability, results in an uncapped minimum local housing need of 652 dpa (13,040 dwellings over the plan period).

As identified in the LHNA, once the standard method cap is applied, the minimum number generated reduces to 638 dpa (at least 12,800 dwellings over the 20 year plan period).

The Plan states that the capped standard method figure is a minimum of 630 dpa (at least 12,600 dwellings over the plan period).

1. The capped standard method minimum figure in the Plan at 630 dpa is lower than the 638 dpa figure set out in the LHNA. Can the Council point us to the document that sets out the reasoning for this please?

3.1.1 The reasoning for this change is set out in PPG:

“The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.” [ID 2a-008-20190220]

3.1.2 The Local Housing Need (LHN) figures calculated by the LHNA (652 dpa uncapped, 638 dpa capped) were correct at the time that the assessment was published in March 2020. However, inputs to the standard method changed before the Plan was submitted.

3.1.3 At the time that the Plan was submitted in November 2021, the standard method calculation set a baseline of 488 dpa which, when adjusted for affordability, resulted in an uncapped minimum LHN of 630 dpa. The applicable standard method cap was higher than this figure (683 dpa) so no cap was applied. The standard method figure in the Plan is therefore uncapped.

3.1.4 PPG confirms that this figure can be relied upon for two years:

“local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.” [ID 2a-008-20190220]

3.1.5 The minimum LHN of 630 dpa is therefore fixed until November 2023.

2. The PPG advises that ‘The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.’

a. As the LHNA identifies a higher housing need above the capped level, what arrangements do the Council have for ensuring that this is planned for as soon as is reasonable? Is this clearly set out in the Plan?

3.2.1 Whilst the LHNA identified a housing need above the capped level, no cap was applied to the minimum LHN identified at the time that the Plan was submitted.

3.2.2 Therefore, the strategic policies within the Plan do not relate to housing need with any cap applied.

b. Whilst our queries on housing provision are set out under a later matter, we note that the evidence suggests that housing supply, as at 2020, equates to 14,935 dwellings. On this basis, has consideration been given to a higher level of housing need being set out in the Plan and could this realistically be delivered during the plan period?

3.2.3 The LHNA concluded that the LHN would provide sufficient workers to align with the forecast jobs growth (paragraph 5.20) and cautioned that as the LHN already incorporates a significant uplift to the baseline household projection, any further uplift to market housing could prove difficult to sustain (paragraph 8.79).

3.2.4 On this basis, the evidence does not justify a higher level of housing need being set out in the Plan.

#### Gloucester’s unmet housing need

The Plan, at paragraph 2.5.5, states that it ‘addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040’. Core Policy CP2 identifies the location and proposed number of dwellings and Strategic Site Allocation Policy G2 states that the site is ‘safeguarded’ and includes specific requirements. The policy is subject to the site being required to meet Gloucester’s housing needs and providing the location accords with the ‘approved strategy’ for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Review (JCS Review), which is currently in preparation.

The draft Strategic Housing Matters Statement of Common Ground (SOCG) on electronic page 71 of document EB3 provides some context to the reasons for the allocation to meet potential unmet needs, which is mainly due to different plan production timescales.

Whilst our more detailed questions on Strategic Site Allocation Policy G2 are set out under later matters, our general queries on meeting Gloucester's unmet housing needs are as follows:

3. What progress has been made to finalise the above SOCG and submit a signed version?

3.3.1 The Council has held discussions with the JSP authorities (Cheltenham, Gloucester and Tewkesbury councils) and an agreed and updated SoCG will be submitted by 21 February 2023.

4. Based on the submitted evidence are we correct in our understanding that Gloucester City's housing needs, housing land supply and level of any unmet housing needs have yet to be confirmed and examined? How far have these assessments progressed?

3.4.1 See answer below under 5.

5. What stage is the JCS Review currently at and what is the timetable for its production and examination?

3.5.1 It is correct to say that Gloucester City's housing needs, housing land supply and level of any unmet housing needs have yet to be confirmed and examined. At the time of submission of the Local Plan(SDLP), the Council stated in the Duty to Cooperate Statement (EB3, para. 5.12) in relation to the JCS review process: "Whilst the Issues and Options consultation commenced in October 2018, a Preferred Options consultation had not been completed by the time the Pre-Submission Stroud Local Plan was published in May 2021 and the JCS response to the Pre-Submission Stroud Local Plan now envisages Reg. 18 consultation later in 2021 with a Reg.19 consultation towards the end of 2022." The JCS (now JSP authorities) added: "The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester's potential housing shortfall" (JCS Reg.19 response para. 9). (para. 5.14).

3.5.2 The latest position will be set out in an updated SoCG with the Gloucestershire authorities. The Council understands that the next stage in the JSP process will be a Regulation 18 document, which will be published in the summer of 2023 for public and stakeholder consultation. The document will consider growth options (how much development) and spatial options (the strategy for delivering growth in the most sustainable way) and other matters. Amongst other evidence documents, it will be accompanied by Urban Capacity Studies for Gloucester City and Cheltenham Borough, which will identify how much growth can realistically be

accommodated in the administrative areas of these local authority areas. The Council understands that the Urban Capacity Studies are currently being finalised.

6. The Plan states that the 2017 adopted JCS recognises that ‘Gloucester City has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9’. National policy states that local plan policies are required to be reviewed within five years of adoption of a plan. In this context, and if the level of any unmet housing need is uncertain at this stage, why does the Council consider it necessary to allocate/safeguard land that may or may not be required?

3.6.1 The Duty to Cooperate Statement (EB3) explains at paragraphs 5.6-5.8 that the Council had agreed in 2013 with its neighbouring authorities to work together, including through an early review of the Stroud Local Plan and Joint Core Strategy, to provide for any unmet needs should they arise. The Stroud Local Plan Inspector also required the now adopted Local Plan to include within it a commitment to undertake an early review to address any unmet needs. As a result, the District Council adopted its Local Plan in 2015 and commenced an early review in 2017. Through the development of the SDLP it was anticipated that the review of the JCS, including the results of a Gloucester City urban capacity study, would inform the contents of the SDLP, but unfortunately the early JCS review process has seen delay.

3.6.2 To avoid the potential for significant delay with the Stroud Local Plan whilst the exact scale of any unmet needs were to be established, and to seek to address in a constructive manner the requests from our neighbouring authorities for the SDLP to “provide for unmet Gloucester/JCS needs, if required and in accordance with the JCS Review” (Reg. 19 representation 916), the District Council took the decision to safeguard land at Whaddon, on the expectation that the need for the site, or otherwise, would be resolved prior to the adoption of the SDLP. The site at Whaddon is located within one of the assessment areas with the strongest accessibility to Gloucester (EB17 Interim Report, Section 3 - area 32), has a clear functional relationship with Gloucester, rather than any Stroud settlement and is being actively promoted.

3.6.3 On the question of waiting for a future Plan review to address unmet needs from 2028/29, if the District Council does not seek to address the issue now, and on the assumption that the SDLP is adopted by early 2024, the District Council would be expected to commence its Plan review by 2029. Even on the assumption that a new planning system could deliver a new Stroud Plan within 30 months, it would not appear possible for Stroud District through the plan-making process, to be able to meet any unmet needs arising from Gloucester until at least 2032/33. The Council has sought instead, in good faith, to identify a potential solution through this Plan review which would result in a site being on track to deliver housing before 2028/29.

7. Provision for designating safeguarded land is set out in paragraph 143 of the Framework and is in relation to the removal of land from the Green Belt. The site proposed to be safeguarded under Strategic Site Allocation Policy G2 is not in the Green Belt. The safeguarding of land would normally imply that, at

least in principle, the development of the site was justified. But the caveats in the policy mean that determining whether the site is justified or not, will be determined at a later date. Yet confusingly the site is also identified within a strategic site allocation policy. Can the Council clarify its position on this and explain how its approach in the Plan in this regard, is justified, effective and consistent with national policy?

3.7.1 At the time of submission, the Council expected that by the time of the examination hearing sessions into the Stroud Local Plan, the JCS Core Strategy Review would have progressed sufficiently for these issues to be capable of resolution. Subject to confirmation that there was a housing shortfall of a scale requiring strategic allocation in another local authority area, and subject to confirmation that the JSP preferred strategy demonstrated that the site at Whaddon was a preferred sustainable location having considered all reasonable alternatives, the Council stated in the EB3 Statement that it would accept a modification to the Stroud District Local Plan specifically allocating the site at Whaddon to help address the unmet needs of Gloucester.

8. When will it be determined whether the site at Whaddon would be required and when it would be consistent with the 'approved strategy' of the JCS Review? Would this be at the point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now?

3.8.1 The SDLP Policy G2 includes a mechanism for allocation on approval/ adoption of the JCS Review (now known as JSP). However, it was the Council's expectation that the principle would have been established by 2023, allowing for a modification to remove this mechanism and to allocate the site.

3.8.2 That position remains the Council's approach. However, if the JSP authorities cannot demonstrate unmet needs, nor sufficient progress with their development strategy, then the Council will accept a modification releasing the site through the development management process in the event that the adopted JSP identifies the site as required to deliver its development strategy, after the Stroud Local Plan has been adopted.

3.8.3 The only other option would be for the SDLP to remove Land at Whaddon as a site and for the matter to be delayed for consideration through a future Stroud Local Plan review process once the JSP has been adopted. As is discussed above, this is likely to exacerbate unmet needs and would not meet the policy requirements set out in the adopted Stroud Local Plan nor the adopted JCS.

9. Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy?

3.9.1 The adopted JCS states that Gloucester City will not be able to meet its needs towards the end of the plan period and the adopted Stroud Local Plan commits the Council to undertake an early review of the plan to assist neighbouring authorities in meeting unmet needs. The Council has therefore been justified in seeking to address the issue through the SDLP.

- 3.9.2 The Gloucestershire authorities have assessed broad locations to meet the future needs of Gloucester City through a strategic study and land at Whaddon is identified as one of the locations with the strongest accessibility to Gloucester (EB17 Interim Report – Section 3, area 32), which has a clear functional relationship with Gloucester, rather than any Stroud settlement and which is being actively promoted. The Council has therefore been justified in identifying land at Whaddon, based on proportionate evidence.
- 3.9.3 The Council has sought to deal with this strategic matter through effective joint working, rather than deferring it, and considers that an approach which seeks to release the site, subject to the tests set out in the policy, will be the most effective way of meeting future needs without building into the process further delay.
- 3.9.4 The Council considers that this approach is consistent with national policy, which states that plans are sound if they provide a strategy which is informed by agreements with other authorities and which seek to meet unmet needs from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development (NPPF, paragraph 35).

#### Housing requirement

The PPG advises that the standard method identifies a minimum annual housing need figure, but states that it ‘does not produce a housing requirement figure.’ The Plan, through Core Policy CP2, states that ‘Stroud District will accommodate at least 12,600 additional dwellings....to meet the needs of the District for the period 2020-2040’. This is the same amount as the capped standard method figure for need set out in the Plan.

10. Is the identified housing requirement of at least 12,600 additional dwellings justified and consistent with national policy? Does the Plan clearly set out in policy both the overall housing requirement for the plan period as a whole, and the requirement that applies in each year of the plan period?

- 3.10.1 The overall housing requirement of at least 12,600 additional dwellings is justified and consistent with national policy.
- 3.10.2 The housing requirement will meet the identified housing needs in full and represents a 40% uplift on the previously adopted annual requirement,
- 3.10.3 The housing requirement is consistent with the Government’s policy objective to increase housing supply.
- 3.10.4 Core Policy CP2 clearly sets out that the Plan seeks to provide 12,600 additional dwellings over the period 2020-2040. The Plan does not set out a separate requirement that would apply in each year as a stepped trajectory is not necessary. The annual requirement is based on the average for the overall plan period.

- 3.10.5 The unmet needs of Gloucester City have not been included within the overall housing requirement, but are identified separately in Core Policy CP2. Any dwellings delivered on the safeguarded land at Whaddon would also need to be monitored separately.
- 3.10.6 An alternative approach would be to establish a single housing requirement figure which included the unmet needs of Gloucester, with all dwellings delivered in the district being counted towards that need. However, as the level of any unmet need has yet to be confirmed, this would require a partial review of the Plan after the adoption of the JCS Review.
11. In a similar vein to question 2 above, has consideration been given to a higher housing requirement to assist in meeting identified housing needs above the cap? Is this a realistic approach?
- 3.11.1 As noted in response to question 2 above, the strategic policies within the Plan address the full uncapped housing need.
12. The LHNA considers that the jobs growth forecast aligns with the resident worker forecasts, so there is no need to increase the housing requirement above the minimum figure identified by the standard methodology. Is this approach justified?
- 3.12.1 Yes, the approach is justified. The LHNA analysis demonstrated that the change in population based on the standard method would provide more resident workers than needed for the jobs growth based on three separate economic forecasts.
- 3.12.2 The Economic Needs Assessment (2020) (ENA) (EB29) was based on the same economic forecasts and provided a detailed analysis of future jobs growth based on the increase in resident workers identified by the LHNA. Depending on the mix of employment, section 11 of the ENA (table 89, page 219) identified the need to provide 44.5-62.5 ha of employment land in Stroud based on the LHNA labour supply.
13. The Plan states that there is an unadjusted need for affordable housing of 424 dpa. This appears to have been established through the LHNA, which identifies a total affordable housing need of 8,476 dwellings in the District for the period 2021-2041. Is our understanding correct?
- 3.13.1 The LHNA provided a breakdown of the key components of the affordable housing assessment for each area over the period 2021-2041 (figure 57) which identified total affordable housing of 8,476 dwellings for Stroud.
- 3.13.2 This total figure included an affordable housing need of 2,207 dwellings for households unable to afford to buy or rent market housing; and 4,630 dwellings for households who could afford market rent, but who aspire to homeownership and could not afford to buy. Both of these groups are included within the definition of affordable housing for planning purposes as set out in Annex 2 of the NPPF and included in national planning guidance for calculating affordable housing need (see PPG ID 2a-018 to ID 2a-024).

3.13.3 However, of those aspiring to homeownership, 3,546 dwellings were for households that, based on their financial circumstances, would not have any realistic prospect of buying any affordable homeownership (AHO) product. Whilst the NPPF and PPG do not identify any affordability criteria for households aspiring to homeownership, it would be irrational to plan AHO products for households who could not afford to buy them. These households can afford market rent, so they do not need rented affordable housing. Therefore, they are discounted from the planned affordable housing.

3.13.4 The total affordable housing figure also included 1,639 dwellings for households currently living in private rented housing supported by housing benefit. However, in establishing affordable housing need, the LHNA assumed that the number of households in receipt of housing benefit in the private rented sector would remain constant (paragraph 8.50):

“... many tenants that rent from a private landlord can only afford their housing costs as they receive housing benefit. These households aren’t counted towards the need for affordable housing (as housing benefit enables them to afford their housing costs), but if housing benefit support was no longer provided (or if there wasn’t sufficient private rented housing available at a price they could afford) then this would increase the need for affordable housing.”

3.13.5 On this basis, these households do not form part of the affordable housing need and they are not counted within the planned affordable housing.

3.13.6 The LHNA identified a total planned affordable housing of 3,291 dwellings for Stroud over the period 2021-2041: 2,707 dwellings for households unable to afford market housing, and 1,084 dwellings for households who aspire to own, able to afford AHO. This is the affordable housing need that the Plan seeks to address as a minimum.

3.13.7 Nevertheless, the affordable housing figure of 8,476 dwellings still provides an important context, as set out in the LHNA (paragraph 8.77):

“... it is important to recognise that there are many more households who aspire to homeownership who either do not have sufficient income or savings that would enable them to realise their aspiration. It is also important to recognise that these figures assume that the number of households in receipt of housing benefit to enable them to afford market housing in the private rented sector does not change. In determining the affordable housing requirement, the Councils may want to consider these households alongside those households living in private rented housing who aspire to home ownership.”

3.13.8 Core Policy CP9 requires qualifying sites to provide at least 30% affordable housing. If all sites were to deliver affordable housing at the 30% policy target, the overall housing requirement of 12,600 dwellings would yield 3,780 affordable homes.



3.13.9 Sites below the relevant policy thresholds are unlikely to contribute any affordable housing and sites subject to specific viability constraints may also be unable to deliver the policy target, which would reduce the 3,780 dwelling total. However, any reduction would be partially offset by sites delivering more than 30% affordable housing, especially those delivering 100% affordable housing.

3.13.10 The Council's response to Matter 7 Question 11 identifies that the policies in the SDLP are likely to deliver 3,593 dwellings which will address the planned affordable housing of 3,291 dwellings that the LHNA identified as the affordable housing need. There is no justification for limiting the number of affordable homes delivered given the wider affordable housing context identified by the LHNA.

14. The evidence, including the Council's Topic Paper EB8, further explains that as the identified housing need figure incorporates a significant uplift, and there is additional supply proposed within the Plan, to provide flexibility, this 'is sufficient to deliver affordable housing without increasing the housing requirement'. Whilst our detailed questions on the affordable housing policy are set out under a later matter, is this approach justified and will the housing requirement in the Plan deliver the identified affordable housing need? If not, what is the Council proposing to do about this, particularly as paragraph 4.21 of the Plan states that affordability is expected to worsen over the plan period?

3.14.1 The Council has considered whether the housing requirement should be higher than the LHN in order to help deliver more affordable homes and has concluded that an uplift was not justified.

3.14.2 The housing requirement in the Plan and Core Policy CP9 will deliver the affordable housing need of 3,291 dwellings identified by the LHNA with a 9% "oversupply".

3.14.3 Whilst the Council recognises the wider affordable housing context and is seeking to maximise the provision of affordable housing, they do not consider an increase to the housing requirement to be an appropriate response for the reasons set out in the LHNA (paragraph 8.79):

"... the LHN itself already incorporates a significant uplift beyond the household projection-based housing need, a further uplift to market housing is likely to prove difficult to sustain and would exacerbate the surplus of workers previously identified. On this basis, whilst an uplift might be appropriate, it would be necessary to fully understand the impact of any proposed increase on other aspects of the plan (such as employment growth) to ensure consistency. It would also be important to ensure that there was clearly identified demand for the additional market housing and that this could be sustained over the longer-term plan period; and where there was uncertainty, it may be more appropriate to consider any uplift being identified as additional supply to provide flexibility within the plan rather than increasing the housing requirement and associated target."

3.14.4 The Council agrees with this analysis. Additional supply has been included in the Plan to provide flexibility and enable more market housing to be delivered where

demand can be sustained. Given the range of uncertainties, the significant uplift already incorporated within the LHN calculation and the planned supply, the Council does not consider a further uplift to the housing requirement to be justified, necessary or appropriate.

15. The housing requirement of 'at least 12,600' dwelling housing requirement does not include the 3,000 dwelling contribution that the Plan is proposing to help meet Gloucester's unmet housing needs. Notwithstanding our previous questions on the soundness of meeting unmet needs, why does this contribution not form part of the housing requirement figure? Is this approach consistent with national policy and guidance?

3.15.1 As noted in response to question 10 above, given the current uncertainties, the Council is proposing that this would be monitored separately. Alternatively, any references to the 3,000 dwellings proposed to help meet Gloucester's unmet needs could be removed and addressed in due course through a partial review of the Plan after the adoption of the JCS Review.

16. To provide clarity for future decision-makers the Plan should clearly identify and distinguish between the objectively assessed housing need, the standard method figure, the housing requirement and the level of provision in the housing requirement to help meet the unmet needs of Gloucester City. Does the Plan do this?

3.16.1 The objectively assessed housing need has been determined to be 630 dpa using the standard method, consistent with Paragraph 61 of the Framework. This is set out at paragraphs 2.5.1-2.5.2 of the Plan and in the notes at row F of table 2.

3.16.2 The housing requirement of 12,600 dwellings over the 20-year period of the Plan is confirmed separately at paragraph 2.5.4 of the Plan and at under the heading for rows F and G of table 2.

3.16.3 As the objectively assessed housing need, the standard method figure and the housing requirement figure all equate to 12,600 dwellings over the Plan period and average 630 dpa, they present a straightforward position for future decision-makers.

3.16.4 As noted in response to questions 10 and 15 above, the unmet needs of Gloucester City have been excluded from the housing requirement, given current uncertainties. If an allowance was to be included within the housing requirement, this would need to be addressed in due course through a partial review of the Plan after the adoption of the JCS Review.

17. Paragraph 65 of the Framework states that 'strategic policies should also set out a housing requirement for designated neighbourhood areas....'. The Council's evidence details that there are 17 neighbourhood areas within the District with 10 made Neighbourhood Plans (NP). The Council's Topic Paper on Neighbourhood Planning (EB5) explains that as no made or emerging NP allocate housing sites, housing requirements are to be set through site allocations in the Plan currently under our examination.

a Is this approach consistent with national policy, particularly with regard to paragraphs 65-67 of the Framework?

- 3.17.1 The Council's approach meets the requirement for authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.
- 3.17.2 The SDLP sets out in CP2 that this will be done through strategic sites that are located at the principal settlements within the District, at new settlements and within the key employment property market areas: south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness.
- 3.17.3 Smaller scale development is expected to come forward at those settlements identified in the SLDP settlement hierarchy, as set out in Core Policy CP3. The policies within the Local Plan identify designated areas where housing, employment and retail development are considered appropriate.
- 3.17.4 The Council accepts that once a housing supply has been confirmed through the SDLP examination process, the Council will be able to disaggregate this supply figure down to Parish level, to support the delivery of future Neighbourhood Plans.

b Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?

- 3.17.5 The whole of Stroud District is covered by either Town or Parish Councils, meaning only they would qualify as an appropriate body to be able to make a Neighbourhood Plan. CP2 sets out the SDLP housing number required and where the sites are located. It is therefore clear which site allocations are in which Parish or Town boundary of all adopted, emerging or future Neighbourhood Plans.
- 3.17.6 Where a future Neighbourhood Plan is prepared for a different area than a Parish, (for example a town centre NDP), the Council will assist in providing an indicative figure at that point in time as allowed in para 67.

c What are the implications of these proposed housing allocations on the designated neighbourhood areas and any emerging or made NP?

- 3.17.7 The Council has a dedicated Neighbourhood Planning Officer who works with Town and Parish Councils and has made all emerging Neighbourhood Plans aware they must be in general conformity with all strategic policies in the SDLP once adopted. The Council is not aware of any emerging Neighbourhood Plans that are not in general conformity.
- 3.17.8 The NPPF (2019) update requires local plan reviews at least every five years. Nationally, this may impact all adopted Neighbourhood Plans at some point as new Local Plans may change strategic policies. In Stroud the Council are not aware of any adopted Neighbourhood Plans which will not be in general conformity with the strategic policies as a result of the allocated sites in the SDLP.

The Council will continue to work positively with all designated areas if they choose to review their Neighbourhood Plan once the Local Plan is adopted.

- 3.17.9 The Council will continue to work positively with emerging Neighbourhood Plans as required and ensure the SDLP Strategic Policies are clear and Neighbourhood Plans are in general conformity.