Gravesham Borough Council

Report to: Cabinet

Date: 12 November 2012

Reporting officer: Director (Housing and Regeneration)

Subject: Proposed Submission Gravesham Local Plan: Core Strategy

Purpose and summary of report:
This report introduces the proposed submission version of the Gravesham Local Plan: Core Strategy, which will be published with an invitation to make representations in December 2012 (Regulation 19), prior to its submission to the Secretary of State in May 2013.

Recommendations:
Cabinet is requested to:

1. Review and comment on the proposed submission version of the Core Strategy annexed at Appendix 2.

2. Approve the publication of the proposed submission version of the Core Strategy with an invitation to make representations, subject to authority being delegated to the Director of Housing and Regeneration, in consultation with the Lead Member for Planning Delivery, to agree minor amendments as needed to the proposed submission version of the Core Strategy prior to publication

3. Agree the Regulation 19 Representations and Publicity arrangements as detailed in 13.4 and 13.5

4. Approve the Core Strategy for submission to the Secretary of State following the invitation to make representations on the proposed submission Core Strategy, subject to the following:
   a. authority be delegated to the Director of Housing and Regeneration, in consultation with the Lead Member for Planning Delivery, to agree the summary of main issues raised and a schedule of any minor amendments to the Core Strategy resulting from the representations made for submission to the Secretary of State along with the Core Strategy and supporting documents;
   b. that critical issues be reported back to Cabinet for consideration.

5. Agree the production of a Local Development Scheme based on the documents to be prepared and timetable in section 10 of this report.

6. Agree that responses to the Retail Policy Approach Update Targeted Consultation representations be delegated to the Director of Housing and Regeneration, in consultation with the Lead Member for Planning Delivery.
1. Introduction

1.1 It is a corporate priority to prepare a series of statutory planning policy documents, which together comprise the Local Plan for the Borough that will eventually replace the existing Gravesham Local Plan 1st Review 1994 as saved. Local Plan is now the term that should be used rather than Local Development Framework. The new Local Plan will set out the Council’s planning strategy and policies to guide the quantity, quality and location of development in Gravesham to 2028. The Core Strategy is the key document and once adopted, all other documents must be in general conformity with it.

1.2 The Gravesham Local Plan: Core Strategy is now ready for the next statutory stages in its preparation and progress to adoption. This report seeks approval for the proposed submission publication of the Core Strategy and its subsequent submission, together with necessary supporting material, to the Secretary of State in accordance with Regulations 19, 20 and 22 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

1.3 This report is accompanied by the following appendices:

- Appendix 2 – Draft proposed submission Core Strategy (without appendices)
- Appendix 3a – Draft 5 year land supply and buffer statement
- Appendix 3b – Table showing sites that can accommodate 5 or more dwellings between 2012-2028
- Appendix 4 – Transport Technical Note
- Appendix 5 – Draft leaflet design
- Appendix 6 – Draft envelope design

2. Background

2.1 Government guidance advises that local planning authorities should produce a Local Plan for their area. These Local Plans should be aspirational but realistic, and deliver sustainable development that reflects the vision and aspirations of local communities, whilst seeking opportunities to achieve net gains across all three dimensions of sustainable development. They should address the spatial implications of economic, social and environmental change. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise, and therefore Local Plans are expected to set out the opportunities for development and clear policies on what will or will not be permitted and where.

2.2 The Core Strategy set out the long term spatial vision of how Gravesham, and the places within it, should develop. It should set out the strategic objectives for the borough, focusing on the key areas to be addressed. It also sets out how much development is intended to happen, when, where and by what means it will be delivered.

2.3 The National Planning Policy Framework (NPPF) requires that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. Gravesham’s Core Strategy is based on a
comprehensive information and evidence base, which has involved the commissioning of a number of technical studies.

3. **Preparation of the Core Strategy and Duty to Cooperate**

3.1 Preparation of the Core Strategy has involved a number of stages as circumstances and the planning policy framework has changed. These stages, whilst adding delay, have enabled us to have extensive and ongoing dialogue with stakeholders in the borough and outside. Growth levels have been tested, and spatial options and strategies considered.

3.2 The Council has tried to maximise opportunities to undertake joint evidence gathering on spatial planning issues to inform policy development. Some evidence has been prepared through joint working with neighbouring authorities, including other North Kent Local authorities and Kent County Council. In preparing other pieces of evidence we have worked closely with key partner organisations, including Highways Agency, Natural England and the Environment Agency.

3.3 A constant throughout the process has been the agreed position for Gravesham within the Kent Thames Gateway sub-region. As part of the consideration of reasonable alternatives, we had to ask stakeholders if they wanted this to change, and in response we were told that the development of the Borough’s significant previously developed land for employment and housing, and protection of the Green Belt was supported. The role of Ebbsfleet as a key economic driver for the sub-region (this regeneration benefit was part of the justification for the international station) was also supported. Having this very clear and agreed sub-region framework, shared evidence base and officer and member groups, has meant that Gravesham has not encountered the duty to co-operate uncertainty experienced in some other areas.

3.4 The areas that have changed have been a more robust and realistic approach to the quantities of development that could be assumed at the key regeneration sites, and stronger and more dispersed approach to economic development with Ebbsfleet not delivering as anticipated. As a number of the key sites now have planning permission this helps to justify the approach that we have taken.

3.5 This proposed submission Core Strategy is a fusion of all that work and discussion to provide a concise and yet spatial clear plan for the Borough to 2028.

4. **Proposed Submission Core Strategy**

4.1 The document being brought to Cabinet has been changed considerably from the version which we consulted on in January 2010. This is due to:

- the availability of further evidence, e.g. Strategic Land Availability Assessment (SLAA);

- the decision by the Government to abolish Regional Spatial Strategies, in our case the South East Plan, whilst recognising that the South East Plan is currently in place and the timing for its abolition is unclear;

- the publication of the National Planning Policy Framework and Planning for Traveller Sites in March 2012
• the results of the Core Strategy consultation in January 2010 which indicated that our approach was not sufficiently spatial nor tailored enough to local circumstances;

• the fact that Development Management Policies are no longer included and therefore some detail left to these later policies is now needed in the Core Strategy, and how it relates to subsequent documents e.g. Site Allocations and Development Management Policies, Supplementary Planning Documents (SPDs), Community Infrastructure Levy (CIL) and Neighbourhood Plans.

• the results of the Gravesham Growth Scenarios and Core Strategy consultation in October 2011 which showed a preference for a lower growth option and the protection of Green Belt and greenfield sites from development; and

• the recommendation by Cabinet in February 2012 that the preferred strategic outcome be based upon:

  • Housing figures of 4,600 to be provided on regeneration sites, sites with planning permission plus small site windfalls;
  • No development of the Green Belt as currently defined;
  • a plan period from 2011-2028;
  • No building on land West of Wrotham Road (see text below);
  • Protection of employment land; and
  • Provision of accommodation within the Green Belt to only be for those with identified needs and in accordance with an exceptions policy.

4.2 The version of the document being brought to Cabinet is very basic in respect to its design so that changes can be more easily incorporated. As well as containing more maps, diagrams and photographs, the proposed submission Core Strategy to be published in December will contain:

• Appendix A – Infrastructure Delivery Plan

• Appendix B – Gravesham Local Plan 1st review policies to be replaced by Core Strategy policies and changes to the Policies Map

• Appendix C – Key Milestones in the Production of the Local Plan Core Strategy (Diagram)

• Appendix D – Glossary of Terms

4.3 Until the Site Allocations and Development Management Policies DPD is adopted, polices from the Gravesham Local Plan 1st Review 1994, which have been formally saved and not superseded by the Core Strategy, will also form part of the Development Plan. The National Planning Policy Framework (NPPF) clarifies that these existing policies should be given due weight according to their degree of consistency with the NPPF. The regional strategy for the South East of England,
the South East Plan, also forms part of the Development Plan until it is revoked by Government.

5. Retail Study Update and Town Centre/Retail Policy Approach Update Targeted Consultation

5.1 This 6 weeks consultation finished on 6 September and the following representations were received:

- Urban Gravesham
- Theatres Trust
- Kent Police
- Dartford Borough Council
- Paul Hancock (local resident)
- Roger Steer (local resident)

5.2 The main issues in the representations concern:

- The validity of the evidence base and whether the KCC household survey is sufficiently up-to-date (2007) and robust to provide an accurate picture of future retail needs;
- The effects of the recession and whether future projections of retail spending based on the full growth assumptions should be used or a lesser figure;
- Whether we should be seeking to maintain Gravesend’s market share of comparison retail spending;
- Where is the best location to accommodate future retail growth, its scale and form;
- The need to have a more rounded vision and strategy for the town centre that is not so retail focused and sensitive to location;
- The need to be more ambitious in terms of commercial leisure and cultural facilities; and
- The need to better articulate the ability of the town centre to become a future office location as identified within the Economy and Employment Space Study and to allocate sites/set a floor space target.

5.3 Dartford BC made a number of points in relation to the evidence base and emerging policy position set out in the retail update work. Under the duty to co-operate, officers will be meeting Dartford BC and Medway Council (where a third party not the Planning Authority itself, raised some similar issues) on retail and other issues.

5.4 Urban Gravesham made a detailed response agreeing that their vision for the town centre is different from that being put forward by GBC but contending that it is compliant with the policy guidance as set out in the NPPF. Conversely, they contend that the position adopted by GBC is unsound because the evidence base is out-of-date, relies on an over-optimistic assessment of the retail needs of the town and fails to plan properly for the challenges facing the town centre. Urban Gravesham suggest that the former King Street cinema site/Brewhouse Yard/Market/Horn Yard area should be used to accommodate any new retail element to pull the town centre back eastwards rather than rely on an extension to the St George’s Centre. This is contrary to the NPPF, which clearly states that the Council should be showing (in broad terms) that how and where the full requirement for town centre type uses can be accommodated over the plan period to 2028.
5.5 As has been the case with all the representations received, these representations and the issues they raise have been carefully considered during the production of the proposed submission Core Strategy and its accompanying technical information. Cabinet is being asked to agree that responses to the Retail Policy Approach Update Targeted Consultation representations should be delegated to the Director of Housing and Regeneration, in consultation with the Lead Member for Planning Delivery. The representations and the Council’s proposed response for this consultation will be uploaded into the consultation system when the proposed submission Core Strategy is published and comments invited.

6. Sustainability Appraisal and Habitat Regulation Assessment

Sustainability Appraisal

6.1 Sustainability Appraisal (SA) is an iterative and integral part of the plan making process. It is needed to appraise the social, environmental and economic effects of a plan as alternatives are considered to ensure that decisions are made that contribute to achieving sustainable development. External consultants, Enfusion, have been undertaking our Sustainability Appraisals and Habitat Regulation Assessments (HRA), and their impartial assessments have been taken into account throughout the Core Strategy’s development.

6.2 Draft appraisals for the Core Strategy, undertaken in two parts, have now been received. In summary, the consultants have advised that they think that we have all done an excellent job in pulling together this version as it reads very well and focuses on what is most important to planning in Gravesham, without unnecessary detail. There are no major issues from an SA perspective and, mostly, the policies perform very well against the SA Framework. They have made a few suggestions and there are some highlighted areas where the consultants need to further information from the Council. The few recommendations mostly relate to:

- A stronger focus on low carbon development (both in the vision and in individual policies)
- Ensuring the Green Infrastructure policy recognises benefits for flood risk management
- Incorporating support for community energy projects in the climate change policy
- Recognising any opportunities for encouraging healthy eating and sustainable food, e.g. food stores policies, spaces for local food markets, allotments
- How the sustainability theme could run stronger through some policies (see recommendations for Green Infrastructure, heritage and tourism policies)
- Further developing the Cultural and tourism policy to consider rural development (especially rural tourism), to recognise and support different cultures and sectors of the community (including different age groups), and to consider the role of public art in new development and the public realm.
- Consider:
  - how existing communities will benefit from new development,
  - the impact of rapid change on existing communities, and
  - how best to mitigate this
- Whether the plan can do anything further in terms of supporting rural communities (especially in relation to accessibility to services)
- Continued monitoring of air quality, one of the key adverse effects of the plan
6.3 The proposed submission Core Strategy, as being brought to Cabinet, has been written whilst having regard to Enfusion’s recommendations.

**Habitats Regulations Assessment**

6.4 The main concern for the Habitats Regulations Assessment (HRA) is around bird disturbance and the North East Gravesend Opportunity Area, which includes the Dalefield Way site. However as this site has been considered at project level and an appropriate assessment undertaken with the advice of Natural England, this was regarded as acceptable.

6.5 The consultants noted the text in the supporting text with regard to the decline in bird populations at the North Thames sites, and strongly recommended that wording be included in the policy itself, to satisfy Natural England, Kent Wildlife Trust and RSPB. Some proposed wording in relation to the bird disturbance work has been proposed to Natural England and Kent Wildlife Trust for inclusion in our Core Strategy, and the wording now included is as proposed by Kent Wildlife Trust.

7. **Accompanying documents**

7.1 The proposed submission Core Strategy will be accompanied by a number of technical papers, which are intended to provide additional background material to support the policies and give context, and studies.

7.2 The Strategic Land Availability Assessment (SLAA) is a key technical study which establishes realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Two particular aspects are being drawn to Cabinet’s attention:

**5 year land supply and buffer statement**

- One of the core planning principles in the NPPF is to proactively drive and support sustainable economic development to deliver homes. In furtherance of this principle it states that Local Planning Authorities (LPAs) should identify and update annually a supply of specific deliverable sites to provide five years’ worth of housing against their housing requirements. An additional buffer of 5% (moved forward from later in the plan period) should be provided to ensure choice and competition in the market for land unless there has been a persistent under delivery of housing in which circumstance the buffer should be increased to 20%.

- The October 2012 5 year land supply and buffer statement is included with this report as Appendix 3a and 3b. The total 5 year deliverable supply for 2013 to 2018 is 1,593 dwellings. That is set against a dwelling requirement of 1,353 dwellings and a 5% buffer target of 1,583 dwellings. At this stage this deliverable supply is also intended to address a projected shortfall of 132 dwellings that is expected to arise due to under delivery between 2011-2013.

**Brief background on land West of Wrotham Road**

- The Core Strategy does not include land West of Wrotham Road within its identified land supply but it is included within the SLAA as a site with accepted development potential.
• The West of Wrotham Road site has a long and complex planning history. The Gravesham Local Plan 1st review, adopted in 1994, included Proposal PM8 whereby the Borough Council in principle supported the development of the land West of Wrotham Road for a high quality business development to the south of Coldharbour Road (See Proposal PE2), between the Safeway food store and Wrotham Road (A227), and (ii) Residential development of the upper valley slope to the east of Marks Square and Lanes Avenue (see Proposal PH2). A subsequent planning application was refused by the Council and in 2001, the Secretary of State (SoS) considered an appeal from the Sir James Colyer-Fergusson Charitable Trust against the refusal of planning permission. The SoS dismissed this appeal.

• The main reason given for dismissing the housing development appeal was that since the development of the Gravesham Local Plan 1st Review and the Planning Inspector’s decision, a revised version of Planning Policy Guidance 3: Housing (PPG3) had been published, and the SoS was not satisfied that the housing element of the appeal was in accordance with the revised policies of PPG3. In particular, he was referring to the sequential test for identifying housing sites, and the presumption that previous developed sites should be developed before any Greenfield sites. He accepted the Borough Council’s confidence that there was sufficient land identified in their urban capacity study. PM8, PH2 and PE2 from the Local Plan 1st Review were not saved in 2007.

• A “Call for Sites” for the draft Strategic Land Availability Assessment (SLAA) was undertaken in January 2009 and the land West of Wrotham Road site was put forward for development. This was considered against the draft SLAA’s site selection and discounting criteria, and was included within the December 2009 draft SLAA.

• When the Core Strategy and Development Management Policies DPD was produced for consultation in January 2010, in paragraph 3.2.292 it contained the following text “the table excludes Land West of Wrotham Road as a development site due to a Cabinet decision taken on 21 December 2009”. As highlighted in the report to Cabinet on 5 July 2010, this issue generated the largest volume of representations. The vast majority of responses were objecting to any proposal to develop the West of Wrotham Road site, as proposed in the draft Strategic Land Availability Assessment (SLAA). As members had excluded the site from the reg. 25 Core Strategy and Development Management Policies DPD, these representations were coded as supporting this approach.

• Therefore the decision at Cabinet in February 2012 is a reiteration of a long standing policy decision by the Council that the site should not be allocated for development.

8. Soundness, monitoring, implementation and review

8.1 The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. This consideration of soundness has four aspects including the need to prove it is deliverable:
• **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

• **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

• **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

• **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

8.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 in part 8 defines what a local planning authority’s monitoring report must contain. This includes identifying any policies in the local plan which are not being implemented, the reasons for this and what steps are being taken to secure the policies’ implementation.

8.3 The starting point for consideration of the monitoring, implementation and review framework for the Core Strategy has been the desire to align the framework with the monitoring and performance framework already in place for the Corporate Business Plan. To add understanding with how this Core Strategy relates to the future Site Allocations and Development Management Policies DPD and the saved policies in the Gravesham Local Plan 1st Review, additional information is included on policy delivery for some of the policies.

8.4 As advised above an Infrastructure Delivery Plan is being prepared as an annex to the Core Strategy to set out the scale, type and cost of infrastructure needed to support the Core Strategy, including who will provide it and how it will be delivered. This includes the revised transport modelling to support the new dwelling requirement of 4,600 dwellings. As this is new information, a technical note is included in appendix 4.

9. **Dealing with uncertainties**

9.1 The proposed submission Core Strategy’s Vision and Spatial Strategy indicate how different parts of the borough will develop in the future. However, the Core Strategy needs to be realistic and therefore it is important that the risks to its delivery (both positive and negative) are recognised and ways of managing those risks are explored.

9.2 The primary source of uncertainty is the overall performance of the economy nationally and locally, which will impact on house building rates, job creation, retail demand and other similar variables. There are a number of major project proposals which could impact on the Borough, where there is either insufficient information to determine what the impact would be or a lack of certainty as to delivery or timing. These include:

• **Lower Thames Crossing** – route and timing currently unknown and therefore the implications
• **Bluewater expansion** – emerging proposal on a scale significantly in excess of the allowance in the adopted Dartford Core Strategy whose implications will need to be examined

• **Thames Estuary airport** – conceptual idea on a massive scale to be reviewed by Government and with a long implementation period

• **Paramount Themes Park at Swanscombe Peninsula** – only just announced and implications to be evaluated, but fits with the broad aspirations for this area which recognise its significant development potential once constraints taken into account.

9.3 The Planning Inspectorate document “Examining Development Plan Documents: Learning from Experience” (September 2009) addresses uncertainty, including reviews of regional strategy. It clearly advises that “uncertainty of this nature should not be used as an excuse for not putting a core strategy in place”.

9.4 Therefore the approach that has been taken in the Core Strategy is to highlight the risks and potential major schemes that may impact on Gravesham. The progress of these will need to be monitored and appropriate action taken when more information comes available them and their certainty of implementation individually or in combination. This action may range from none at all to the need to review (in whole or in part) the Core Strategy. The critical test will be having sufficient information to justify whatever change to the Core Strategy is being proposed.

10. **Local Development Scheme**

10.1 The Local Development Scheme (LDS) sets out the authority’s intentions and programme for the period up to the end of 2014. It is subject to periodical updating, especially as circumstances change. The current LDS envisaged that the proposed submission consultation on the Core Strategy would take place in April-May 2012 with submission in July 2012 and adoption in December 2012. The LDS will need to be updated to take into account the revised timescales for the production of the Core Strategy as set out below:

**2012**

• 12/11 – Cabinet

• 18/12 – Proposed submission stage Core Strategy invitation to make representations (8 weeks)

**2013**

• 12/02 – Invitation to make representations closes

• Early May – Submission to PINS

10.2 Apart from the slippage in timeframe, the documents to be produced will be the same as that in the current LDS. We are considering whether to produce a joint Traveller DPD with neighbouring authorities or include traveller site allocations in our site allocations and DM Policies DPD. The Council needs to understand the results of the new Traveller Accommodation Assessment (TAA), which has just been commissioned, before this can be considered further.
11. Planning Delivery Committee

11.1 It has been agreed with the Planning Delivery Lead Member that the Planning Delivery Meeting on the 27 November will be open to all Members to attend. Officers will give a presentation highlighting the key components of the proposed submission Core Strategy and will answer questions as required. It is proposed that at the Parish Chairmen’s meeting on 1 November, the chairmen will be asked if they want a Parish Chairmen’s meeting dedicated to the proposed submission Core Strategy.

12. Next steps

12.1 Subject to Cabinet approval, the proposed submission Core Strategy will be published and representations invited in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for an eight week period from mid-December. The regulations require at least six weeks but because it will be available for comment over the Christmas break, eight weeks is proposed.

12.2 Copies of all responses received during pre-submission publication will then be forwarded to the Planning Inspectorate for consideration alongside the Submission Core Strategy, together with a summary of main issues raised by the representations. In contrast to previous stages of consultation, the Council will not be making any changes to the Core Strategy prior to submitting the Plan. However, if so required, a Schedule of Minor Post-Publication Changes (editing) can be prepared by the Council and submitted to the Planning Inspectorate.

13. Regulation 19 Representations and Publicity

13.1 The October 2011 consultation involved sending a letter and leaflet to every household in the Borough; publicity in local papers; emailing or writing to everyone on our consultation database; arranging a public meeting; attending all the neighbourhood forums; and attending all parish council meetings as well as other meetings and forums, e.g. Youth Council. We encouraged responses to be sent online via our consultation portal.

13.2 In the event, very few people responded in this way. Instead, many preferred to send in letters or emails and many signed a series of standard letters and petitions. Multiple representations were received from some individuals and, in addition, representors were apparently encouraged to individualise their response. Generally this did not result in additional issues being raised, rather it stopped the ability to upload responses in bulk and increased the need to redact letters to prevent personal information from being disclosed. There was a high level of response which was largely due to the inclusion of potential greenfield and Green Belt sites. Uploading all the responses onto the consultation portal has been very resource intensive and this is one reason why the Core Strategy has been delayed.

13.3 The invitation to make representations on the proposed submission Core Strategy is different to previous stages as the representations are to the Council for transmission to the Planning Inspector rather than for the Council to consider. The Planning Inspectorate has certain information that it needs for the examination and has a model Representation Form for this which we would use. It is recognised that this is not the most user friendly form although it does have
guidance notes, but it has been developed to ensure that the representor provides the information needed by the Planning Inspector to consider their representation.

13.4 When the proposed submission Core Strategy is published, it is proposed that a leaflet an updated model Representation Form is sent to every household and business in the Borough. This will be in an unaddressed envelope to be delivered by Royal Mail’s door to door service in a customised envelope to increase the chances of it being opened. The leaflet (copy attached to this report as appendix X) will briefly explain that the community has been listened to and the key components of the proposed submission Core Strategy. It will advise that if they wish to make representations a copy of the model Representation Form is enclosed for that purpose.

13.5 As before, minimal hard copies of the documents will be produced and the documents will be available to view on line. CDs will be provided for Members and parish councillors.

14. BACKGROUND PAPERS


14.3 Growth Scenarios and Core Strategy October 2011 consultation document and supporting documents are available via the consultation portal http://localplan.gravesham.gov.uk/consult.ti/system/listConsultations?type=C


Anyone wishing to inspect background papers should, in the first place, be directed to Committee & Electoral Services who will make the necessary arrangements.
**IMPLICATIONS**

<table>
<thead>
<tr>
<th>Legal</th>
<th>All local authorities are required to produce a local plan by the planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012. The Local Plan is now ready for the next statutory stages in its preparation to progress and adoption. Any decision of Cabinet which falls outside of a statutory framework may be amenable to challenge by way of judicial review.</th>
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<tr>
<td>Finance and Value for Money</td>
<td>The Council maintains a ring-fenced Local Development Framework Reserve (X909) which currently has a balance of £250k. During 2012/13 it is expected that this reserve will fund the printing and consultation costs towards the end of this year. The unspent balance will roll forward into 2013/14 to provide for the inspection costs following submission of the plan.</td>
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<tr>
<td>Risk Assessment</td>
<td>Medium</td>
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<td><strong>Equality Impact Assessment</strong></td>
<td><strong>Screening for Equality Impacts</strong></td>
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<tr>
<td><strong>Question</strong></td>
<td><strong>Answer</strong></td>
</tr>
<tr>
<td>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community?</td>
<td>No</td>
</tr>
<tr>
<td>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality?</td>
<td>Yes</td>
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<td>c. What steps are you taking to mitigate, reduce, avoid or minimise the impacts identified above?</td>
<td>N/A</td>
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*In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above*
<table>
<thead>
<tr>
<th>Corporate Business Plan</th>
<th>Objectives 13 and 14</th>
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<td>Crime and Disorder</td>
<td>None</td>
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