



**SPECIAL MEETING OF THE COUNCIL
WEDNESDAY 24TH FEBRUARY 2016
(Draft New Local Plan)**

Book 7 - 2015/2016

Council Enquiries – Ann Horgan, Ext. 2413

Agendas and Minutes can be viewed at www.castlepoint.gov.uk
Copies are available in larger print & audio format upon request



Council Offices, Kiln Road,
Thundersley, Benfleet,
Essex SS7 1TF.
Tel. No: 01268 882200
Fax No: 01268 882455



David Marchant LLB (Hons) BSc (Hons) CEng FICE FCMI
Chief Executive

A SPECIAL MEETING OF THE COUNCIL of the Borough of Castle Point will be held in the Council Chamber, Council Offices, Kiln Road, Thundersley, on **WEDNESDAY, 24TH FEBRUARY, 2016 to follow on immediately after the Special Council meeting scheduled for 7.30pm convened to set the Council Budget and Council Tax** and all Members of the Council, listed below, are hereby summoned to attend to transact the undermentioned business.

Councillors A.G. Sheldon (The Worshipful the Mayor), S. Cole, (Deputy Mayor), A.J. Acott, J. Anderson, A.J. Bayley, D.A. Blackwell, B. Campagna, D.T. Cross, W.J.C. Dick, Mrs B. Egan, E. Egan, Mrs W. Goodwin, P.C. Greig, S. Hart, N.R. Harvey, R.C. Howard, J. Hudson, R. Hurrell, G.I. Isaacs, Mrs J. King, N.E. Ladzrie, C.W. Letchford, C.A. MacLean, P.J. May, C.E. Mumford, B.A. Palmer, Mrs. J. Payne, A. Partridge, C.G. Riley, W.K. Sharp, T.F. Skipp, N.G. Smith, J.A. Stanley, M.J.A. Tucker, P.E. Varker, A.C. Walter, Mrs L. Wass, Mrs G. Watson, N. Watson and B.S. Wood.

Chief Executive

AGENDA

PART I

(Business to be taken in public)

1. Apologies for absence

2. Members' Interests

3. Draft New Local Plan

At the meeting of the Special Council on 27.1.2016 two Motions were deferred for a report to assist in determining the next actions to be taken to progress a draft Local Plan. A report is attached for consideration.

SPECIAL COUNCIL

24th February 2016

**Subject: Draft New Local Plan –
Report on Motions put to Special Council on 27.01.2016**

1. Purpose of Report

At a Special meeting on 27th January 2016, Council considered reports on the Draft New Local Plan. The recommendations to note the findings of the Task & Finish Group, to incorporate the changes to the Plan accepted by the Group, and approve the publication of the Plan, were not agreed.

Two alternative motions were put to Council. Consideration of these Motions was deferred to allow a report to be prepared to explain their effect. This report sets out those Motions, explains their consequences and seeks direction from Council on the next steps for the Plan.

2. Links to Council's Priorities and Objectives

The proposals primarily concern the following Council aims:

- Transforming our Community
- Efficient and Effective Customer Focused Services

3. Recommendation

To consider this report on the Motions deferred from the Special Council meeting on 27th January 2016, and give direction as to whether to proceed to revise the Draft New Local Plan to reflect either

- Motion 1 (removal of some Green Belt sites for housing development)
or
- Motion 2 (removal of all Green Belt sites for housing development)

Note on Procedure

At the meeting, Council will be asked to consider each Motion separately. At the conclusion there will be one vote .Members will be asked to express a preference for Motion 1 or Motion 2.

Once the decision has been made Officers will prepare a revised Draft Plan to reflect the Council decision. The revised plan will be brought back to a Special

Council meeting for approval prior to publication, consultation and submission to the Secretary of State.

4. Background

- 4.1 At the Ordinary Council meeting on 9.12 2015 consideration of the report on the Draft New Local Plan was deferred to a Special meeting of the Council to allow all Councillors to review the Strategic Housing Land Availability Assessment (SHLAA) sites.
- 4.2 At a Special meeting on 27th January 2016, Council considered reports on the Draft New Local Plan. The recommendations to note the findings of the Task & Finish Group, to incorporate the changes to the Plan accepted by the Group, and approve the publication of the Plan, were not agreed.
- 4.3 However, Council did agree to defer for report on the effect of two Motions to a further Special meeting of the Council to determine the next action to be taken to progress the Draft Local Plan. These Motions are set out below:

Motion 1

To alter the draft Local Plan to prioritise protecting Green Belt over meeting our objectively assessed housing needs and

- *remove all virgin green belt sites listed without current planning permission, including sites listed in the Castle Point SHLAA 2014 listed on lines :- (site descriptions now included)*
 - *3 - (Land between Felsted Road and Catherine Road Benfleet (Part of H9))*
 - *5 - (Land to south of Essex Way, Benfleet (H15))*
 - *9 - (44 Badger Hall Avenue, Benfleet)*
 - *14 - (Wall Wood & 291 Benfleet Road, Benfleet)*
 - *15 - (Land South of Jotmans Lane, Benfleet (Part of H14))*
 - *17 - (Land to the north & west of The Hoy & Helmet Public House, High Street, Benfleet)*
 - *57- (East of Canvey Road, Canvey Island,(H16))*
 - *60 - (Former Castle View School, Meppel Avenue, Canvey Island (H8))*
 - *76 – (Land East of Rayleigh Road & North of Daws Heath Road, Hadleigh (H10))*
 - *78 – (Oak Tree Farm (North field) and Southfield Close Extension, Hadleigh)*
 - *89 - (Land East of Cedar Hall School, Hart Road, Thundersley (Part of H4))*
 - *97 – (Land West of Glebelands, Thundersley(H13))*
 - *104 – (Bowercombe, Great Burches Road, Thundersley)*
 - *107 – (Land south east of Sadlers Farm, Benfleet (Part of H14))*
 - *108 – (Ellis House, Felstead Road, Benfleet (Part of H9))*
 - *111 – (Land North of Jotmans Lane, Benfleet (Part of H14))*
 - *143 – (Land between Canvey Road, Roscommon Way & Northwick Road (Triangle Site), Canvey Island)*
 - *155 – (Land south of Daws Heath Road, Hadleigh)*

- 160 – (Land off Kiln Road/North of The Chase, Thundersley **(Part of H4)**)
- 161 - North of Grasmere, Thundersley
- 257 - Land South of Eastwood Old Road, Eastwood (**H12**) and
- 258 - (Land north of Eastwood Old Road, Hadleigh)
- *investigate other constraints (including drainage ,transport infrastructure flood risk and hazardous sites)*

And that the draft Plan as altered be resubmitted for public consultation.

Motion 2

To alter the draft Local Plan to prioritise protecting Green Belt over meeting our objectively assessed housing needs and remove all Green Belt sites and that the draft Plan as altered be resubmitted for public consultation.

- 4.4 The Motions share a common principle. It is clear that Members do not wish to see Green Belt allocated for housing development in the draft New Local Plan placing the protection of the Green Belt above meeting the objectively assessed housing needs of the Borough. The difference is in the detail which is addressed in the following Section 5.

5. The Motions

Motion One

- 5.1 This Motion proposes that the housing proposals in the Draft New Local Plan be amended. The amendment would prioritise the protection of the Green Belt above meeting housing needs. It proposes the removal of “virgin” Green Belt sites without planning permission from the Draft New Local Plan, including those 22 sites listed in the 2014 SHLAA. It also requires an investigation of constraints.
- 5.2 The Motion and its proposed amendments are unclear. First, there is no statutory definition of “virgin” Green Belt. Land is either allocated as Green Belt, or not. Within the Green Belt, sites may host buildings or other structures, such as farm buildings, sports pavilions or dwellings. The National Planning Policy Framework indicates that the essential characteristics of Green Belt are its openness and permanence.
- 5.3 However, the National Planning Policy Framework does define “Previously developed land” as:

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential

gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

- 5.4 Amendments to the Draft New Local Plan to exclude Green Belt sites which are not “previously developed land” would leave the following sites in the Plan;

H8 - Land at the Former Castle View School Site Canvey Island (the Draft New Local Plan site is occupied by former school buildings);

H9 - Land between Felstead Road and Catherine Road Benfleet (the Draft New Local Plan site includes land occupied by former commercial and current residential buildings).

- 5.5 Secondly it is unclear from the Motion what action is required in respect of the 22 sites specifically referred to, since some are not included in the Draft New Local Plan as proposals sites.

- 5.6 Thirdly, the Motion appears to leave some Green Belt sites in the Draft New Local Plan – namely H11 Land South of Daws Heath, Hadleigh, comprising Solby Wood Farm and Brooks Farm, and part of H9 Land between Felstead Road and Catherine Road Benfleet (no’s 396 to 408 London Road Benfleet - albeit this land has a planning permission dated 21.02.2014 and resolutions for further planning permissions from January 2016).

Constraints

- 5.7 The Motion also requires investigation of other constraints to include drainage, transport infrastructure, flood risk, and hazardous installations.

- 5.8 At the time Council approved the Draft New Local Plan for consultation, reference was made to the considerable body of background evidence on constraints which had been prepared to support the Plan;

- Transport Evidence
- Whole Plan Viability Report
- Community Infrastructure Needs Assessment
- Local Wildlife Sites Review
- Strategic Flood Risk Assessment
- Surface Water Management Plan
- Flood Risk Sequential and Exception Test of Sites Report
- Green Belt Boundary Review
- Sustainability Appraisal of Sites Review

- 5.9 In considering responses to the consultation on the plan, the Task and Finish Group received a detailed briefing on all constraints. At least three separate meetings took place to explain how the Draft New Local Plan was prepared taking these matters into account. Furthermore a separate session of the

Task and Finish Group was devoted to the consideration of policies and responses relating to the hazardous installations on Canvey Island.

- 5.10 All of this material is published on the Council's website.

Motion 2

- 5.11 This Motion also proposes that the housing proposals in the Draft New Local Plan be amended. The amendment would prioritise the protection of the Green Belt above meeting housing needs. It proposes the removal of **all** Green Belt sites from the Draft New Local Plan.
- 5.12 This Motion is clearer in that it does not seek to categorize Green Belt sites, and makes clear that all Green Belt sites are to be removed.

Effect of the Motions on the Housing Supply in the Draft Local Plan

- 5.13 Table One appended to this report shows the source of housing supply in the Draft New Local Plan.
- 5.14 The Table does not include site H17 Land East of Canvey Road and H18 North West Thundersley as these sites are not sources of housing supply. H17 is identified for a 50 bed space residential care home. Because of current undeliverability, H18 is an area of land safeguarded in the DNLP for potential future housing, beyond the current plan period. For this reason, no account may be taken of any potential capacity at H18 in calculating housing land supply on the Plan.
- 5.15 The Table sets out the effect of the Motions on the housing supply in the Draft New Local Plan.
- Column 1 describes the source of the housing supply (whether from the 1998 Adopted Plan, Council decision of 2012, or the Draft New Local Plan).
 - Column 2 refers to the Draft New Local Plan Policy Reference Number.
 - Column 3 refers to capacity and
 - Columns 4 and 5 describe the effect of the motions.
 - The Columns to the right of the Table cross refer the sites to the SHLAAs of 2014 and 2015.

6. Risks and Corporate Implications

- 6.1 Members are referred to the report before Council on 9.12.2015, which were restated on 27.01.2016, which sets out the serious legal, reputational and financial risks at Sections 7 to 9 of the report of 09.12.2015 in failing to take forward a sound Draft New Local Plan. These sections are attached as an Appendix.

- 6.2 The Council is advised that there is a substantial risk that a Draft New Local Plan amended in the form of either Motion is unlikely to meet the four tests of soundness as set out in paragraph 182 of the NPPF, which are:

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 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.

- 6.3 In addition the Council has a statutory duty to comply with the Duty to Co-operate to ascertain whether the Council's neighbouring authorities are able to take some of the Council's unmet housing need. A draft New Local Plan which seeks only a limited ability to meet its housing need will not sit well with neighbouring authorities who are seeking to release green belt sites to meet their own housing needs: to expect those authorities to release even more of their green belt to meet the Council's unmet need is unrealistic.

Conclusion & Next Steps

- 7.1. It is clear that Members recognise that the draft New Local Plan needs to be progressed and as a general principle Members oppose the use of Green Belt sites for housing development giving priority to the protection of the Green Belt above meeting the objectively assessed housing needs of the Borough.
- 7.2 As stated previously Motion 1 is unclear, inconsistent and contradictory suggesting that it is acceptable to leave certain Green Belt Sites within the Draft Local plan but excluding others. Council is reminded any attempt to remove sites that is not supported by evidence will result in the Council's approach to meeting its housing needs being found unsustainable.
- 7.3 Motion 2 the removal of all Green Belt sites for housing development presents the least worst option in that it is a clear unambiguous policy statement that the Council's priority is the protection of the Green Belt and the Council will not allow the use of any green belt sites to meet its objectively assessed housing needs.
- 7.4 If Council is minded to direct that the draft New Local Plan is amended to reflect either of the two Motions then it is recommended that the Council directs that the Draft New Local Plan be altered to remove all Green Belt housing sites to prioritise protecting Green Belt over meeting the Borough's objectively assessed housing needs.

Background Papers

Item 12 Draft New Local Plan reports to Council 9.12.2015

Item 3a & 3b reports to Special Council 27.1.2016

Councillor Dick's Motion at Special Council 27.1.2016

Report Author: Chief Executive's Report to Council.

Table 1

Source of Housing Supply in Draft New Local Plan (DNLP)

	Policy No.	Sites Address	DNLP Capacity	Motion 1 - Remove specific GB sites	Motion 2 - Remove all GB sites	SHLAA 2014			SHLAA 2015		
						Row	Reference	Capacity	Row	Reference	Capacity
1998 ALP sites	H7	Land off Scrub Lane, Hadleigh (1.6ha)	64	64	64	66	GF02B	49	76	GF02B	49
	H6	Land at Point Road, Canvey Island (2.8ha)	160	160	160	30	ELR02 Site 2	55	36	ELR02 Site 2	55
						212	ELR02 Site 1	35	137	ELR02 Site 1	35
	H5	Land at Thorney Bay, Caravan Park, Canvey Island (21.8ha)	600	600	600	48	GB05(A1)	100	53	GB05(A1)	113
						135	GB05(A2)	500	146	GB05(A2)	487
						86	GF01A	125	97	GF01A	27
H4 (part)		Land off Kiln Road, Thundersley (1998 ALP) (11.3ha)	221	221	221	88	GF01B	50	98	GF01B	71
							Sub-total	914		Sub-total	837
2012 five year sites	H8	Land at the former Castle View School, Canvey Island (1.2ha)	50	0	0	60	GB04	50	64	GB04	50
	H9	Land between Felsted Road and Catherine Road, Benfleet (13ha)	200	50	0	3	PGB05	140	4	PGB05	140
						4	PGB36	50	7	PGB36	50
						108	2014/6	5	116	2014/6	5
		Sub-total	250	50	0		Sub-total	245		Sub-total	245
2014 DNLP sites	H11	Land South of Daws Heath, Hadleigh (8.34ha)	180	180	0	77	PGB40	125	88	PGB40	125
						79	2012/7	84	89	2012/7	67
	H12	Land South of Eastwood Old Road, Eastwood (6.6ha)	50	0	0	257	2014/1	112	261	2014/1	112
	H10	Land East of Rayleigh Road, Hadleigh (29.4ha)	430	0	0	76	GB06	430	87	GB06	430
	H15	Land West of Glyders, Benfleet (1.2ha)	35	0	0	5	PGB08	30	6	PGB08	30
	H13	Land West of Glebelands, Thundersley (7.7ha)	100	0	0	97	GB07	140	106	GB07	140
	H14	Land West of Benfleet (46.2ha)	800	0	0	107	PGB30(A)	175	115	PGB30(A)	175
						15	PGB30(C)	400	18	PGB30(C)	400
						111	PGB30(B)	300	119	PGB30(B)	300
	H4 (part)	Land off Kiln Road, Thundersley (2014 DNLP) (27.7ha)	229	54	0	87	PGB09C	54	100	PGB09C	54
						89	PGB09B	35	99	PGB09B	35
						160	PGB09	311	267	PGB09	311
H16		Land East of Canvey Road. Canvey Island (13.78ha)	275	0	0	57	PG02	275	61	PG02	275
		Sub-total	2,099	234	0						
Other sites		Other Non-Green Belt Sites	794	794	794						
		Green Belt Sites with Extant Consent	17	17	17						
		Sub-total	811	811	811						
		Total	4,205	2,140	1,856						

7. The risks associated with out-of-date plans and Corporate Implications

- 7.1 As the Proper Officer of the Council the Chief Executive has a duty to ensure that before any decision is made Councillors are aware of the consequences of failure to progress the Draft New Local Plan. The Chief Executive will be writing separately to the Leaders of the Political Groups on the Council and the Independent Members on the Council regarding the legal, reputational and financial risks in failing to take forward the Draft New Local Plan.

Legal

- 7.2 The Council needs to make progress with a New Local Plan. The Government, in publishing the Housing and Planning Bill on the 13th October 2015, has made it clear the requirement for local planning authorities to produce statutory development plans by 2017.
- 7.3 The Draft New Local plan will be assessed at independent examination by a planning inspector against the four tests of soundness in paragraph 182 of the National Planning Policy Framework, one of which incorporates a test as to whether the plan is positively prepared, based on a strategy which seeks to meet needs where this is consistent with meeting sustainable development.
- 7.4 The evidence supporting the Draft New Local Plan supports the strategy selected, which seeks to meet the needs of the Borough so far as is consistent with the policies of the National Planning Policy Framework when taken as a whole.
- 7.5 Any attempt to remove sites that is not supported by evidence will result in the Council's approach to meeting its housing needs being found unsustainable.
- 7.6 This in turn could put the entire plan at significant risk with the Council being faced with the prospect of either a finding of unsoundness or having to withdraw yet another development plan document after examination.
- 7.7 Members of the Task & Finish Group considered in some depth the constraints affecting the Borough however these constraints can only be applied through the Local Plan process.
- 7.8 Without a Local Plan the Objectively Assessed Needs (OAN) for the Borough is 400 dwellings per annum. It is this figure that will be the starting point for any Planning Inspector at appeal in assessing whether the Council has a 5 year housing land supply.
- 7.9 With a Local Plan in place, the evidence having been tested at public examination the Council can rely on the target figure of 200 per annum because of the application of constraints. There is also the risk that at Appeal

developers will argue that the OAN figure of 400 per annum referred to above should be much higher (as occurred in the Jotmans Appeal).

- 7.10 The Council will be assessed as to whether it has fulfilled its “duty to co-operate in relation to planning of sustainable development” (as set out in Section 11 of the Localism Act 2011) with other statutory bodies and agencies including neighbouring councils. Significant work has been carried out over the course of the preparation of the Draft New Local Plan to fulfil this duty.
- 7.11 Furthermore failure to take into account the findings of the Sustainability Appraisals, Habitat Regulations Assessment and Equality Impact Assessments in the decision making process could result in the New Local Plan being found to be procedurally unsound.
- 7.12 Given the timeframes set by Government in the Housing and Planning Bill, having the Draft New Local Plan found unsound or withdrawing the Draft New Local Plan would result in the deadline of 2017 not being achieved and put the Council at risk of intervention by the Secretary of State.

Reputational

- 7.13 Failure to produce a statutory development plan places the Council at risk of intervention by the Secretary of State. Where the Secretary of State thinks that a local planning authority are failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a development plan document, he or she could intervene and produce a statutory development plan for the authority.
- 7.14 Whilst during intervention the Council would remain responsible for the costs of preparing the Draft New Local Plan, it would have no control over the process and would be burdened with the outcomes and significant costs. This is unlikely to be a positive experience for the Council.
- 7.15 Laura Graham, the Independent Planning Inspector made this point very clear to Members when she met with them on 11th November 2015.
- 7.16 In addition the Growth and Infrastructure Act 2013 imposed upon local planning authorities a requirement to improve performance. An authority where more than 20% of appeals on applications for major development are allowed during the 2 year assessment period will be designated. The result of designation will mean that developers may apply for planning permission direct to the Secretary of State and the authority is no longer authorised to determine major applications.

Financial Implications

General Financial Statement:

- 7.17 The Council is reminded of the Medium Term Financial Forecast, presented to Council in February 2015, which indicated a significant funding gap in each

financial year from 2017/18 which the Council must address in order to maintain existing service levels.

- 7.18 The Council is already effectively committed beyond its means in future years i.e. spending funds it does not have, and will need to identify reductions to existing services.
- 7.19 The position with regard to Council reserves is also serious. There are very real and significant financial risks, particularly around planning appeals and associated legal costs. These risks, coupled with the projected budget gap, result in a complete depletion of general reserves within the next three to four financial years.

Specific Financial Implications:

- 7.20 The Council had previously established a specific reserve for local plan development costs, of £250,000. By the end of 2014/15 only approximately £35,800 remained unspent. The further stages of plan preparation are likely to cost in the region of £190,000 for publicity, a Programme Officer and examination costs. The additional costs of £154,200 would need to be made available from reserves.
- 7.21 Should the Draft New Local Plan not be agreed, then further work on a new plan would be required; resources will need to be identified to meet the costs of new documents and evidence. Work carried out with existing evidence is as set out in the list below under Background Papers.
- 7.22 Any new evidence to be collected is likely to incur a cost not less than that already spent (£184,000), together with new consultation costs (not less than £35,000). In addition to these costs, there will also be additional staff costs amounting to £31,000.
- 7.23 Should the Council decide not to proceed with the Draft New Local Plan, then there are also potentially significant costs and resource implications to the Council in dealing with planning appeals. Any such costs would reduce General Fund reserves. The most recent calculation of the minimum recommended level of General Fund reserves, in the February 2015 Policy Framework and Budget Setting report, indicated a potential amount of £1.6m, should appeals be found against the Council.
- 7.24 Council is also asked to note a point of clarification regarding the position with reserves. No funds have been set aside to deal with planning appeals. Rather an exercise has been carried out to quantify a potential financial risk that may materialise as a consequence of not having an up-to-date local plan. Approval to draw from reserves would be required as each risk materialised. There is no approval to spend implied reserves.
- 7.25 The costs associated with preparing a development plan under the direction of the Secretary of State are also likely to be significant and beyond the control of the local authority.

- 7.26 The absence of an up-to-date plan will also leave the Council exposed to speculative development proposals in unwelcome locations, and with no mechanism for being able to negotiate maximum benefits from development proposals. As failure to adopt a Draft New Local Plan will result in the inability of the Council to seek contributions for infrastructure improvements through Community Infrastructure Levy (CIL). As a result the Council will only be able to seek developer contributions through negotiation via S106 Agreements which, as from April 2015, is limited in its use.
- 7.27 As highlighted by Laura Graham the local authority may find ultimately, development may be permitted “by appeal” as it has been elsewhere, when insufficient progress has been made with the local development planning process.
- 7.28 The likelihood is that if those appeals are successful the intensity of development will exceed that currently proposed within the Draft New Local Plan and on sites not currently within the Draft New Local Plan.

Human Resources and Equality Implications

Human Resources:

- 7.29 The next stages of the Draft New Local Plan preparation can be carried out using existing resources.

Equality Impacts:

- 7.30 The Draft New Local Plan is supported by an Equality Impact Assessment to ensure that the outcomes of the plan result in a fair and equal community.

IT and Asset Management Implications

- 7.31 There are no implications of this kind associated with recommendations set out in this report

Timescale for implementation

- 8.1 The Council’s adopted Local Development Scheme, agreed at the time when the Draft New Local Plan was agreed for consultation in January 2014, assumes that a period of twelve months will be required from the Council’s agreement to proceed with a plan to its eventual adoption. Following this guide, further consultation would take place in the spring 2016, before submission in the summer 2016, for examination in the autumn 2016, with an inspector’s report due in the winter of 2016/7.

9. Conclusions

- 9.1 The Task & Finish Group has carried out the work set for it by Council. It is now for the Council to consider and agree the next stages in the preparation of the Draft New Local Plan having regard to the risks rehearsed in the report.

- 9.2 To re-consider the Draft New Local Plan at this stage exposes the Council to the risk of unwelcome development, “planning by appeal”, and potential Government intervention.