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WELWYN HATFIELD BOROUGH COUNCIL  
CABINET PLANNING AND PARKING PANEL – 6 SEPTEMBER 2018  
REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING  
AND GOVERNANCE)

REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF) JULY 2018

**1 Executive Summary**

- 1.1 The revised National Planning Policy Framework (NPPF) was published on 24 July 2018. It sets out the Government's planning policies for England and how these are expected to be applied.
- 1.2 The revised NPPF can be viewed here:  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 1.3 The revised NPPF replaces the previous National Planning Policy Framework published in March 2012.
- 1.4 Alongside the publication of the revised NPPF, the Government updated Planning Practice Guidance on viability, the standard methodology for calculating housing need and published a Housing Delivery Test measurement rule book.
- 1.5 The fundamental planning principles contained in the original NPPF are unchanged. The purpose of the planning system continues to be to contribute to sustainable development (of which there are three dimensions: economic, social and environmental). The revised NPPF retains a presumption in favour of sustainable development and reaffirms that the planning system should be planned.
- 1.6 The revisions to the NPPF focus it more strongly on the delivery of homes to meet need and put greater responsibility and accountability on Councils for the delivery of housing. It should also be noted that the revised NPPF goes much further than the previous NPPF in terms of promoting high quality design of new housing and places.
- 1.7 This report outlines the key revisions to the NPPF and identifies any potentially significant implications for the Council as local planning authority.

**2 Recommendations**

- 2.1 That the Panel notes the revised NPPF and the identified implications of the revisions for plan-making and planning decisions.

### **3 Background**

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
- 3.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.3 The first NPPF was published in March 2012. In 2017 the Government indicated its intention to update the NPPF. A Draft Revised NPPF was subsequently issued in March 2018 for public consultation. This was accompanied by Draft Planning Practice Guidance for Viability and a Draft Housing Delivery Test Measurement Rule Book.
- 3.4 A report was presented to the Panel on 12 April 2018 detailing the proposed changes to the NPPF, their potential implications, and setting out the Council's proposed response to the consultation. The Panel commented on the proposed responses and authorised the Head of Planning to prepare and submit a final response in consultation with the Executive Member for Planning. A consultation response was formally submitted to the Government in advance of the 10 May 2018 deadline.
- 3.5 The revised National Planning Policy Framework (NPPF) was published by on 24 July 2018. It can be viewed here:  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 3.6 Alongside the publication of the revised NPPF, the Government updated Planning Practice Guidance on viability and published a Housing Delivery Test measurement rule book.
- 3.7 The revised NPPF replaces the previous NPPF published in March 2012.

### **4 Explanation**

The revised NPPF updates the Government's planning policies for England and how these should be applied.

#### Format and structure of document

- 4.1 The document itself is divided into themed chapters in the same way as the previous NPPF. Chapters on plan-making and decision taking have been moved to the front of the document and the chapter relating to the delivery of homes has been moved closer to the front of the document (probably to reflect its elevated importance to the Government) but otherwise the order of the chapters remains broadly consistent.

- 4.2 The individual chapters have been reorganised in a number of cases such that they now read in a much more logical and helpful way. Overall the revised NPPF is substantially more user friendly than the previous NPPF.
- 4.3 A new chapter has been introduced entitled “Making the best use of land”.

#### Overall thrust of document

- 4.4 The revised NPPF is based on the same fundamental planning principles and the previous NPPF.
- 4.5 Paragraph 7 of the revised NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. This is the same purpose as set out in the previous NPPF.
- 4.6 In the same way as the previous NPPF, the revised NPPF identifies three overarching dimensions to achieving sustainable development: economic, social and environmental.
- 4.7 The revised NPPF retains a presumption in favour of sustainable development.
- 4.8 The revised NPPF focuses more strongly on the delivery of homes to meet need and puts greater responsibility and accountability on Councils for the delivery of housing. It is notable that it goes much further than the previous NPPF in terms of promoting high quality design of new housing and places.

#### Implementation

- 4.9 Key details in relation to the implementation of the revised NPPF are set out in Annex 1 of the document. The NPPF's policies came into effect on the day of its publication (i.e. 24 July 2018). They have already become material considerations which should be taken account in dealing with planning applications. With respect to plan-making, the revised NPPF sets out transitional arrangements for the implementation of its policies. Paragraph 214 provides that plans submitted on or before 24 January 2019 will be examined against the previous NPPF. The Council submitted its Draft Local Plan for examination in May 2017 and its examination is ongoing. In accordance with the revised NPPF, the plan's examination will continue to be against the policies in the previous NPPF. Further detail on this is provided in the following part of this report. It is important to note that should the plan be withdrawn or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned.
- 4.10 Officers are currently reviewing the extent to which the submitted Local Plan is consistent with the revised NPPF. While it is not necessary to update the plan for the purposes of the Local Plan examination, there are clear benefits to ensuring that the plan is as up to date as possible. The extent to which it is not fully consistent with the revised NPPF would need to be taken account of by officers and members in determining planning applications. The Council is able to propose modifications to the Local Plan as part of the examination process where these are necessary to make the Plan sound or to improve the clarity of the Plan.

#### Plans

- 4.11 Paragraph 17 sets out that development plans must include strategic policies to address each local authority's priorities for the development and use of land. However it provides that these strategic policies can be produced in different ways, depending on the issues and opportunities facing an area. They can be contained in joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies), or combined authorities producing a spatial development strategy.
- 4.12 What this means is that in future the Council has the option to prepare its own plan or work with other authorities to produce a joint strategic plan which covers a wider area. In this regard, the Government has recently awarded £250,000 to North Herts, East Herts, Stevenage and Welwyn Hatfield councils to progress joint planning work for long-term development needs.
- 4.13 Non-strategic plans can be brought forward by local planning authorities or neighbourhood planning authorities.

#### Presumption in favour of sustainable development

- 4.14 The revised NPPF reiterates the previous NPPF in terms of a presumption in favour of sustainable development. The definition of the presumption is updated in the revised NPPF.
- 4.15 The previous NPPF required local plans to meet objectively assessed need subject to certain caveats. Paragraph 11 of the revised NPPF sets out that strategic policies should as a minimum provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within other areas (as established through statements of common ground) subject to similar caveats. This amendment puts a greater emphasis on the Council to meet its minimum needs and also on working with neighbouring Councils who might not be able to meet their own needs. Linked to this, other Councils would be required to meet any need that cannot be met by Welwyn Hatfield having regard to the application of the identified caveats.
- 4.16 The revised NPPF updates what are deemed to be out of date policies for applications involving the provision of housing. Footnote 7 to paragraph 11 of the revised NPPF sets out that out of date policies include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. The Housing Delivery Test is a new measure introduced in the revised NPPF which could have a significant bearing on the Council's decision-taking. This is addressed in more detail in a later section of the report. If the policies in the Council's Local Plan should be deemed to be out-of-date there will be a much greater expectation on the Council to approve proposals unless the adverse impacts would significantly and demonstrably outweigh the benefits.

#### Tests of soundness

- 4.17 The tests of soundness relating to the examination of plans are slightly amended in the revised NPPF.
- 4.18 In the previous NPPF to be 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.

- 4.19 In the revised NPPF to be positively prepared plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- 4.20 In the previous NPPF, to be justified a plan was required to be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. In the revised NPPF, a plan is required only be an appropriate strategy.
- 4.21 In the previous NPPF, to be effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. The revised NPPF, strengthens the test such that cross-boundary strategic matters must have been dealt with rather than deferred, as evidenced by the statement of common ground.

#### Duty to co-operate

- 4.22 Local authorities already have a legal duty to cooperate on strategic matters that cross administrative boundaries. The NPPF now provides further clarity about the duty and how it will be expected to be discharged in the production of plans. A much greater emphasis is placed on statements of common ground as a way of evidencing cross-boundary working.
- 4.23 Paragraph 27 of the revised NPPF advises that to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be made publicly available throughout the plan-making process to provide transparency. The soundness test for whether a plan is effective has been updated in line with this to require statements of common ground as evidence that effective joint working on cross-boundary strategic matters has taken place and been dealt with rather than deferred. The presumption in favour of sustainable development in the NPPF now requires that for the purposes of plan-making that unmet development need are addressed through statements of common ground. Paragraph 137 of the revised NPPF sets out that in determining whether exceptional circumstances exist to justify changes to Green Belt boundaries a local planning authority must have discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through statements of common ground.
- 4.24 In taking forward future plans the Council will have to co-operate to a greater extent with neighbouring councils and there will be a need to produce statements of common ground to evidence this. The more common approach to date has been to prepare a memorandum of understanding to evidence to an examination inspector and others what has been agreed at the end of the duty to co-operate process.

## Standard methodology for Assessing Local Housing Need

- 4.25 As part of the Government's Planning for the Right Homes in the Right Places consultation in autumn 2017 it indicated that it intended to introduce a new standardised method of calculating housing need. The revised NPPF confirms this requirement. It confirms that plans should be based on a local housing need assessment conducted using the standard method in national planning guidance, unless there are exceptional circumstances to justify an alternative approach. The method takes the Government's household growth projections and applies an affordability ratio, comparing local house prices with workplace earnings, to produce a need figure. The Government hopes the method will end protracted wranglings on the issue during local plan examinations. However, the Ministry for Housing, Communities and Local Government, in its consultation response, said it will consider adjusting the methodology in order to meet its 300,000-homes-a-year target in light of the impending publication of new household growth projections that are likely to be lower than previous estimates. It will consult on the specific details when the new projection figures are published in September.
- 4.26 The Government's standard methodology for assessing local housing need currently amounts to a need of 867 homes per year in Welwyn Hatfield. This compares to the objectively assessed need of 800 per year identified in the Council's Strategic Housing Market Assessment Update 2017 prepared by consultants Turleys.
- 4.27 As set out in paragraph 4.9 there are transitional arrangements in place for the implementation of the revised NPPF. The Council's Draft Local Plan has already been submitted for examination. The examination is currently in progress and in line with the revised NPPF the plan will continue to be assessed against the previous NPPF. This means that the figure of 800 homes per year will be the basis on which the plan is examined. It should be noted that the Draft Local Plan contains a housing target of circa 12,000 dwellings to 2032. This is a significant shortfall compared with the objectively assessed need of 800 homes a year which equates to 15,200 homes to 2032 and 16,000 to 2033 (the Inspector has indicated that the plan should be rolled forward one year further which would mean accounting for another year of need).
- 4.28 If the Council's plan is withdrawn from examination or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned. This means that unless exceptional circumstances justify an alternative approach the new plan would need to be based on the Government's standard methodology for assessing local housing need which currently amounts to a need of 867 homes per year in Welwyn Hatfield. This figure may be subject to change however, following the publication of 2016-based household projections later in 2018.

## Housing Delivery Test

- 4.29 The revised NPPF introduces a Housing Delivery Test for local authorities. The test will measure the number of homes created against local housing need and penalise councils that under-deliver against various thresholds over a three-year period.
- 4.30 Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years,

the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 4.31 From 2020 the Housing Delivery Test has significant implications where delivery is below 75 per cent of the housing requirement. In accordance with paragraph 11 of the revised NPPF, policies in the development plan relating to the provision of housing will be considered out of date and the presumption in favour of sustainable development will apply. However, this year, the presumption penalty threshold is less than 25 per cent, rising to less than 45 per cent next year. MHCLG will publish annually the results of the Housing Delivery Test, starting in November 2018.
- 4.32 Alongside the revised NPPF, the Council has published a Housing Delivery Test measurement rule book. This can be viewed here: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>. The rule book sets out in detail how the tests will be applied. The figure to be used for the number of homes required depends on how old the latest adopted housing requirement is. If this is more than five years old then the figure for the borough will be the minimum annual local need figures as identified through the Government's standard methodology (currently 867 homes per annum for Welwyn Hatfield). If the latest adopted housing requirement is less than five years old then the figure used will be the lower of the latest adopted housing requirement or the minimum annual local housing need figure.
- 4.33 In identifying the correct housing requirement figure for the calculation, for the financial years 2015-16, 2016-17 and 2017-18, the minimum annual local housing need figure is replaced by household projections in all aspects of the Housing Delivery Test.
- 4.34 If the number of homes which are built are significantly below the identified number that need to be delivered (below 75%) then the Council will have failed the test and its policies will therefore be rendered out-of-date. A presumption in favour of sustainable development would then need to be applied to decision-taking. This puts a much greater expectation on the Council to approve proposals unless the adverse impacts would significantly and demonstrably outweigh the benefits.
- 4.35 It is likely that the housing target ultimately selected through the current Local Plan examination process will be challenging. It is therefore likely that delivery of that housing target over the plan period will also be challenging. The delivery of permitted homes is essentially outside the Council's control and there are very few tools available to the Council to incentivise landowners/developers to build homes once permission has been granted.

#### Planning conditions

- 4.36 Paragraph 76 of the revised NPPF suggests that to help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period (usually three years). Whilst this is option welcomed, there are very few other levers in the revised NPPF that can be used to incentivise landowners/developers to build homes once permission has been granted. This

represents a considerable problem as significant under-delivery (below 75%) would render the Council's policies as out-of-date and mean the presumption in favour of sustainable development would need to be applied to decision-taking.

#### Green Belt release

- 4.37 For the first time the Government has provided a set of criteria which must be met in order to justify and evidence that exceptional circumstances exist to allow Green Belt boundaries to be altered. As part of the justification, paragraph 137 requires that the strategic policy-making authority assess all other reasonable options for meeting those identified needs as well as demonstrating whether the strategy makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and is informed by a Statement of Common Ground with neighbouring authorities as to whether they could accommodate some of the identified need for development.

#### Affordable housing

- 4.38 The revised NPPF contains an expanded definition of affordable housing. The definition – set out within the glossary of the document – has been broadened to include affordable housing for rent (encompassing both social rent and affordable rent), starter homes (as defined under Sections 2 and 3 of the Housing and Planning Act 2016), discounted market sales of at least 20% below market value and other shared equity or 20% below market value schemes.
- 4.39 The revised NPPF sets out an expectation at paragraph 64 that at least 10% of homes on major housing sites should be available for affordable home ownership with exemptions for Build to Rent, purpose built elderly or student accommodation, self-build or wholly affordable proposals. A major development site is defined by the Government as a housing development of 10 or more dwellings or a site area of more than 0.5 hectares. By way of comparison the submitted Local Plan expects that sites of 11+ homes can viably deliver 25% affordable homes in Hatfield, 30% in Welwyn Garden City and 35% in villages and rural locations.

#### Small and medium sized sites

- 4.40 Paragraph 68 of the revised NPPF contains a requirement that local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a new requirement that was not present in the previous NPPF, however it is less strenuous than the 20% target set out in the Draft Revised NPPF in March 2018. It is likely that this requirement has been added to assist small house building companies to play a greater role in delivery.

#### Viability

- 4.41 The revised NPPF contains updated guidance on viability matters. In addition, new Planning Practice Guidance relating to viability has been published. They both provide that all viability assessments should be made publicly available.

#### Housing for rent and other specialist housing

- 4.42 There is a greater focus in the revised NPPF on housing for rent and other specialist housing. New wording is included requiring that the needs of students,

travellers and people who rent their homes are considered as part of the overall assessment of housing need and that their needs are subsequently reflected in planning policies. The revised NPPF provides support for Build to Rent housing and specialist accommodation schemes by exempting them from the 10% minimum affordable housing requirement.

#### Good design

- 4.43 The revised NPPF goes significantly further than the previous NPPF in terms of promoting high quality design. It states upfront in Chapter 12 Achieving well designed places that the creation of high-quality buildings and places is 'fundamental' to what the planning and development process should achieve. It sets out a new requirement that councils should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme. This is welcomed.

#### Effective use of land

- 4.44 A new chapter relating to the effective use of land has been included in the revised NPPF. This combines guidance found in various parts of the previous NPPF with new guidance about the Government's expectations for using land. Paragraph 117 is clear that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 4.45 Paragraph 118 gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, promotes the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively and supports opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, the revised NPPF state that policies and decisions should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers.
- 4.46 The revised NPPF states that local planning authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. It specifically encourages Councils to use their compulsory purchase powers to boost delivery. The Council is already taking a proactive role in meeting development needs in the borough, for example as part of its programme to regenerate Hatfield Town Centre and Highview.
- 4.47 Paragraphs 120 and 121 emphasise that policies and decisions need to reflect changes in the demand for land and that local planning authorities should take a flexible approach to allowing alternative uses to come forward where there is no reasonable prospect of the preferred use and where this would help to meet identified development needs. In particular it advises that they should: use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in the framework; and make more effective use of sites that provide community services such as

schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

- 4.48 The revised NPPF is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible including the use of minimum density standards for town centres and other locations that are well served by public transport. It advises that these standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. It include new explicit advice that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the framework The Submitted Local Plan already contains density guidance and supports higher densities in sustainable locations.

#### Town centre uses

The NPPF continues to support the role of the town centre and maintains the requirement to identify a network and hierarchy of centres. Primary shopping areas and the extent of town centres still need to be defined but the need to identify primary and secondary frontages has been removed from the revised NPPF. Sites should be identified to meet the scale and type of development needed looking at least ten years ahead.

#### Plan Review

- 4.49 Paragraph 33 of revised NPPF set out a new requirement that plans should be reviewed at least every five years. It is clear that strategic policies within plans will need updating where local housing need figures have or look set to change significantly. This has been accompanied by a change to the Regulations making it a legislative requirement.

#### PPA

- 4.50 The revised NPPF reiterates that that applicants and local planning authorities should consider the potential for voluntary Planning performance agreements (PPAs) where this might achieve a faster and more effective application process. New guidance sets out that PPAs are likely to be needed for applications that are particularly large or complex to determine. The Council already seeks to negotiate PPAs in respect of large or complex applications.

#### Agent of change principle

- 4.51 The revised NPPF reiterates that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. To help ensure this, it introduces a new 'agent of change' principle. In a move designed to protect existing businesses from complaints from residents of newly-built schemes, paragraph 182 of the framework states that where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be

required to provide suitable mitigation before the development has been completed. This is broadly welcomed, however it is unlikely to address problems which arise from permitted development, such as changes of use from office to residential, as this does not require planning permission.

#### Flooding

- 4.52 Paragraph 156 of the revised NPPF contains an additional requirement that in managing flood risk strategic policies should consider cumulative impacts in, or affecting, local areas susceptible to flooding.

#### Aviation

- 4.53 In respect of aviation, Paragraph 104 gives additional guidance that planning policies should recognise the importance of maintaining a national network of general aviation facilities, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

### **5 Legal Implications**

- 5.1 There are no direct legal implications associated with this report. The NPPF sets out the Government's planning policies and how they should be applied. It must be taken into account when preparing the development plan and is a material consideration in planning decisions.

### **6 Financial Implications**

- 6.1 There are no direct financial implications associated with this report. It should be noted however that the NPPF introduces additional responsibilities for Councils in relation to the preparation and review of plans which could have implications for the Local Plan budget.
- 6.2 The Government has previously consulted on the possibility of restricting New Homes Bonus where councils do not achieve their housing need. No announcement has been made in the revised NPPF or elsewhere in relation to whether or not this proposal will be taken forward.

### **7 Risk Management Implications**

- 7.1 As the Draft Local Plan is currently subject to examination, in line with the transitional arrangement in the revised NPPF, it will continue to be examined against the previous version of the NPPF. This mitigates a number of key risks, however should the plan be withdrawn or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned.
- 7.2 The greatest risk in respect of the revised NPPF surrounds the introduction of a Housing Delivery Test. If the number of homes which are built are significantly below the identified number that need to be delivered (below 75%) then the Council will have failed the test and its policies will therefore be rendered as out-of-date. A presumption in favour of sustainable development would then need to be applied to decision-taking. This would take an element of control away from the Council when determining planning applications. It is likely that the housing target that is ultimately selected through the current Local Plan examination

process will be challenging. It is therefore likely that delivery of that housing target over the plan period will also be challenging. The delivery of permitted homes is essentially outside the Council's control and there are very few tools available to the Council to incentivise landowners/developers to build homes once permission has been granted.

## **8 Security and Terrorism Implications**

8.1 There are no security or terrorism implications associated with this report.

## **9 Procurement Implications**

9.1 There are no procurement implications associated with this report.

## **10 Climate Change Implications**

10.1 There are no climate change implications associated with this report.

10.2 The revised NPPF contains policies relating to climate change that will need to be considered by the Council in the preparation of planning and other documents and the determination of planning applications.

## **11 Link to Corporate Priorities**

11.1 The subject of this report is linked to the Council's Business Plan 2018-2021 and particularly Priority 1 Our Community, Priority 2 Our Environment, Priority 3 Our Housing and Priority 4 Our Economy.

## **12 Equalities and Diversity**

12.1 An EqIA was not completed because this report does not propose changes to any existing service-related policies or the development of any new service-related policies.

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Date	August 2018