

Report to: **Strategic Planning Committee**

Date of Meeting 7 March 2023

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Designated Neighbourhood Area Housing Requirements

Report summary:

Revision to the National Planning Policy Framework (NPPF) in 2019 introduced a new requirement on Local Planning Authorities to establish a housing requirement figure for all designated neighbourhood areas (DNAs) in their area when preparing a Local Plan. The recent consultation on the emerging draft Local Plan referred to this future work package and identified the currently 40 such designated neighbourhood areas that exist in East Devon. There is no set methodology by Government for calculation of these housing requirement figures and various differing approaches are still being tested nationally at Local Plan examinations.

By the time the Regulation 19 publication draft of the Local Plan is released (currently scheduled for autumn 2023) we will need to have selected a method that we can justify, and use that to calculate figures for each of our DNA's. This will subsequently be tested at examination, including the consultation undertaken on the method selection.

Officers are therefore seeking approval to commence informal engagement with neighbourhood plan groups (NPGs) to raise awareness of this matter and inform our consideration of the options for how we undertake this task more effectively.

This engagement would form part of our duties to consider, and support NPGs to consider, the relationship between neighbourhood plans and the emerging local plan.

Following this, after a further report to Committee, a wider consultation exercise would need to be held prior to Local Plan Publication stage.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Strategic Planning Committee note the work needed for the emerging Local Plan regarding designated neighbourhood area housing requirements, the complexities to be addressed, and the need for further specific consultation on a methodology for calculating these figures;
2. That Strategic Planning Committee agree that in preparation for the consultation, Officers can commence dialogue with communities that have a designated neighbourhood area to inform the development of this work package, including on both a 1 to 1 basis and via officer-led group discussion, and;

3. That Strategic Planning Committee note that a more detailed technical report on the potential options and their implications and on the proposed consultation be brought back to Committee, prior to a full formal consultation being launched.

Reason for recommendation:

To support the preparation of a compliant Local Plan that meets Government requirements and guidance related to designated neighbourhood area housing requirement, and that collects the appropriate evidence to demonstrate this. Also, to further our responsibility to engage constructively and openly with neighbourhood plan groups including in the consideration of the relationship between neighbourhood plans and the emerging Local Plan.

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Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

Climate change Low Impact

Risk: Medium Risk; This is a key area to be resolved for the emerging Local Plan to be compliant with national planning policy and support it being found sound at examination. It is also potentially complex and sensitive. Engagement therefore needs to commence as soon as practically possible with affected communities. Failure to do so could impact upon plan preparation timetable and/or the examination process.

Links to background information [National Planning Policy Framework \(2021\)](#), [Planning Practice Guidance \(Neighbourhood Planning\)](#), [emerging East Devon Local Plan \(Regulation 18 draft\)](#), [adopted East Devon Local Plan \(2013-2031\)](#), [EDDC Neighbourhood planning webpages](#).

Link to [Council Plan](#)

Priorities (check which apply)

- Better homes and communities for all
 - A greener East Devon
 - A resilient economy
-

Report in full

1. Overview

1.1. As Members will be aware, we are required to establish and plan for a housing requirement figure for the whole of the district as part of the preparation of our new local plan. Government has also placed a requirement on Local Planning Authorities to set a housing requirement figure for each and every designated neighbourhood area¹ in its jurisdiction. This was introduced through the 2019 revision of the National Planning Policy Framework. This is set out at paragraph 66 of the latest NPPF (2021), as follows:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”

1.2. As this paragraph clarifies, this is not an additional housing requirement, but is part of the total housing requirement for the district for the plan period.

1.3. In the draft emerging local plan as consulted upon recently, the housing requirement for the district was set out in Strategic Policy 3 – ‘Levels of future housing development’. This draft policy included a clause stating that the final form of the policy “will set out the housing provision requirements for designated neighbourhood areas in East Devon”. It went on to identify the designated neighbourhood areas that this would apply to, of which there are 40 in East Devon.

1.4. In alphabetical order, these are:

- All Saints
- Axminster
- Axmouth
- Aylesbeare
- Beer
- Bishops Clyst (Clyst St Mary & Sowton)
- Broadclyst
- Broadhembury
- Budleigh Salterton
- Chardstock
- Clyst Honiton
- Clyst St George
- Colyton
- Cotleigh
- Dalwood
- Dunkeswell
- East Budleigh with Bicton
- Exmouth
- Farringdon

¹ A designated neighbourhood area is the area in which a neighbourhood development plan (neighbourhood plan) or neighbourhood development order or a community right to build order can be introduced, and designation of such is the first formal stage of preparing a neighbourhood plan by a neighbourhood planning body.

- Feniton
- Hawkchurch
- Honiton
- Kilmington
- Luppitt
- Lympstone
- Membury
- Monkton
- Newton Popleford and Harford
- Otterton
- Ottery St Mary and West Hill
- Payhembury
- Rockbeare
- Seaton
- Sidmouth (Sid Valley)
- Stockland
- Uplyme
- Upottery
- Whimble
- Woodbury
- Yarcombe

- 1.5. All of our designated neighbourhood areas equate to the whole of the parish of that name, apart from Clyst Honiton which covers part of the parish, Ottery St Mary and West Hill which covers those 2 parishes jointly, and similarly, Colyton, which now includes the parish of Colyford (with effect from the 1st April 2023).
- 1.6. The draft policy did not include any figures (i.e. number of dwellings) for the proposed housing requirement for our designated neighbourhood areas, but instead noted that these would need to be included following a consultation on the methodology for doing so.
- 1.7. The purpose of this paper is to follow up on the commitment in the supporting text to the draft policy that “The Council intends to consult on the methodology to be used to identify the appropriate level of housing requirements. This public consultation will be held prior to determining and justifying the housing requirements for each designated Neighbourhood Area to be set out in policy in the Publication Plan.”
- 1.8. Specifically, we are seeking Members approval to start an initial consultation exercise with neighbourhood planning groups, before reporting back to Committee on findings and providing more detail on a proposed wider consultation on the matter.

2. Key Considerations

- 2.1. The need to set a housing requirement figure for every designated neighbourhood area, and the selection of which methodology is used, raises a number of potential issues, implications, and sensitivities and will require careful consideration. It is therefore important that we engage proactively and constructively with neighbourhood plan groups as soon as possible in order to understand their intention and aspiration for neighbourhood plan preparation in their areas. This evidence gathering will inform consideration of how we can best support groups through the necessary setting of a housing requirement for their neighbourhood areas.

2.2. Ultimately, we will be tested at examination on the housing numbers and the methodology used to calculate them. It will therefore be important that both the method and the process that led to selecting it can be justified and demonstrated to be consistent with national policy, in order for the local plan to be found sound.

2.3. At this initial stage, officers have identified a number of closely-related considerations presented below that the work package will need to address. We wish to make Members aware of these for information and to aid future decision making on this topic.

1. Strategic policy

2.4. The Government requires us to set a housing provision requirement in strategic policy for each and all of our designated neighbourhood areas. In doing so, it does not require us to make any distinction between those that have made (adopted) neighbourhood plans (currently 25), those that have emerging plans at different stages of the plan making process (c.10), and those who have not yet undertaken any substantive plan preparation work (c.5). Therefore by default, we will need to provide a housing requirement figure for communities which have had a designation made at any time in the past but have not progressed plan preparation and have no current intention of doing so, as there appears to be no mechanism in the legislation for de-designating neighbourhood areas (only for amending them). Across the board, the Government simply requires that we set a figure that, 'reflects the overall strategy for the pattern and scale of development and any relevant allocations'.

2.5. In the interim, neighbourhood plan groups can continue to request indicative figures from us, or to calculate and evidence their own if none are provided. However, once the figures are set in strategic policy in the new Local Plan, and have been tested at examination, they will apply until and unless (a) a new neighbourhood area is designated (either at a late stage in the preparation of the local plan or after adoption), or (b) where the adopted strategic policies for housing in the new local plan became out of date.

2. Neighbourhood area level 'geography'

2.6. Below district level, the primary 'geography' used for place-making in both the adopted and the emerging local plan are settlements (rather than parishes), together with strategic areas of growth. This is fundamental for the purposes of the spatial strategy. It underpins the settlement hierarchy policy and the distribution of housing growth. It is a commonly used approach, underpinned by principles of sustainable development.

2.7. However, NPPF requires strategic policy to specifically set out the local housing requirement figures at designated neighbourhood area level. Those areas broadly equate to parishes. Having two different 'geographies' in strategic policies is therefore necessary but potentially confusing. Furthermore, the neighbourhood area level housing requirement figures must reflect and not undermine the spatial strategy.

2.8. Designated neighbourhood areas may of course contain none, part of, one, or more than one, settlements from the proposed settlement hierarchy, or strategic growth areas, within their boundaries. Although housing commitments and allocations can usually be readily related to a settlement and an individual parish, this is not always the case. Some proposed developments straddle parish boundaries.

2.9. Both the method used to calculate neighbourhood area housing requirements and the related reasoned justification of the policy in the local plan need to make logical sense,

in both planning terms and for communities. In particular, they need to ensure that the eventual local plan policy on housing requirement in each designated neighbourhood area supports the local plan's vision, strategy and objectives.

3. Limited guidance and no set methodology

- 2.10. There is a lack of detail and a degree of ambiguity in the Government reasoning and expectation about the purpose of the designated neighbourhood area housing requirement. Planning Practice Guidance (PPG) on Neighbourhood Planning (paragraph 104) expands minimally on the prescription in the NPPF for local plans to provide these figures, interpreting it as a need for strategic policy in the local plan to "have established the scale of housing expected to take place in the neighbourhood area".
- 2.11. The primary stated intention of using local plans to set these figures articulated in the guidance is to provide evidenced figures that can be used in neighbourhood plans as "a basis for their housing policies and any allocations they wish to make". And, once the strategic policies have been adopted through the local plan, "these figures should not need re-testing at neighbourhood plan examination, unless there has been a significant change in circumstances". This then gives a degree of certainty from which neighbourhood planning groups can plan. The process should also reduce the burden of proof on, and the need for resources from neighbourhood planning bodies.
- 2.12. It is important to note that Government is clear that the housing requirement figure is a minimum requirement, and not a cap on development. Neighbourhood plans could therefore plan to exceed it, provided this is consistent with the spatial strategy and strategic policies.
- 2.13. Critically, whilst it is a requirement for us to undertake this work, Government has not prescribed a method for doing so, and has provided little guidance to inform method selection. However, PPG is clear that we can utilise the general policy making process already undertaken by us in our plan making, by taking into consideration (a) relevant policies such as the spatial strategy, (b) our evidence base, (c) the characteristics of the neighbourhood area, including its population and role in providing services (which already informs our proposed settlement hierarchy), and (d) areas or assets of particular importance (such as AONB designation), which may restrict the scale, type or distribution of development in a neighbourhood plan area.
- 2.14. There are as yet very few adopted Local Plans nationally that in combination demonstrate an accepted and tested approach which could be used as a model. There are a number of plans currently at examination where this matter has been the subject of Inspector's questions, but initial investigations indicate that to date a variety of different approaches are being taken by both local planning authorities and inspectors.
- 2.15. The main point of difference between the approaches is about what aspects of 'housing supply' are taken into account in making the housing requirement calculation. That is, should it include all or some of the potential supply sources i.e. completions, commitments, local plan allocations, any neighbourhood plan allocations, any windfall allowance (which is inherently difficult to forecast at this level of geography). The choice of start date is another variable, i.e. whether requirement figures cover the whole plan period (2020-2040) or only that which is yet to come.
- 2.16. When assessing the methodology options, the District Council will need to be mindful that the selected method will itself be tested using the tests of soundness, one of

which is “effectiveness”. This includes consideration of whether inclusion of potential supply from neighbourhood plans can be justified in terms of deliverability.

4. Justification of the housing requirement figure

- 2.17. A continuation of the approach taken and considered to have worked well in the adopted Local Plan (which pre-dates the introduction of this Government requirement) is considered unlikely to be found consistent with current national policy. The adopted local plan made provision for the housing requirement for the whole district, with no housing requirement given for neighbourhood areas. Neighbourhood planning groups who requested indicative housing figures, were advised they were ‘zero’. Although still being proposed in some emerging local plans, it is Officer opinion that an automatic flat rate of ‘zero’ for all neighbourhood areas, and/or a reliance on neighbourhood plan groups to seek indicative figures from us on request, would fail to comply with current Government policy and guidance.
- 2.18. Under the new approach, it is still highly likely that the calculation for some of our more rural and remote designated neighbourhood areas would be a nil housing requirement, depending on the methodology used. This would not mean that there would necessarily be no development in those areas in the plan period as, for example, windfall developments including exception sites, may still potentially occur.
- 2.19. Furthermore, housing requirement figures calculated at this time for strategic policy purposes may need to be updated when further housing supply data becomes available later in the plan’s preparation, including housing monitoring and any update to emerging local plan allocations.
- 2.20. Officers therefore propose to pursue the approach outlined in the emerging draft local plan to proceed with a work package to calculate housing requirement figures for all of our DNA’s, on the basis of a method still to be decided, and to incorporate these into strategic policy in the Publication version of the plan.

5. Neighbourhood planning and housing provision

- 2.21. Finally, and crucially, there is the need to be clear what obligation having a housing requirement figure places on communities who apply for/have secured designation of a neighbourhood area. To this extent, the Government position is clear. The Government remains committed to neighbourhood planning, with its role and value reaffirmed in the changes to the planning system proposed through the revision of the National Planning Policy Framework and in the Levelling Up and Regeneration Bill.
- 2.22. There will remain no obligation on communities with a designated area to prepare a neighbourhood plan, as well as no obligation for those with ‘made’ neighbourhood plans to review and update them. Nevertheless, as all neighbourhood plans in East Devon to date have, by necessity, been devised in general conformity with the current adopted local plan, and typically to the same plan period (ending 2031), it is not unreasonable to anticipate that adoption of the new local plan (to 2040) will trigger reviews and preparation of new and modified neighbourhood plans in the district.
- 2.23. Whilst Government guidance ‘encourages’ neighbourhood planning bodies to plan to meet their housing requirement, and where possible exceed it², crucially, neighbourhood planning groups do NOT have to make specific provision for housing in their plans. The scope of their plans is for them to determine. NOR do they have

² Planning Practice Guidance – Neighbourhood Planning Paragraph: 103 Reference ID: 41-103-20190509

seek to allocate sites to accommodate their designated neighbourhood area housing requirement – which indeed may have already been met through allocations in the local plan. Nevertheless, by including the designated neighbourhood area housing requirement figures within strategic policy as the Government requires us to do, this then connects directly into the ‘basic conditions test’ that all neighbourhood plans must meet. That is, to be in general conformity with the strategic policies of the local plan, and not to promote less development than these stipulate³.

- 2.24. Whether or not the new Local Plan allocations should or will cover the housing requirement for all designated neighbourhood areas in full still needs to be unpicked, in dialogue with neighbourhood planning groups, Members, and other consultees. However, at all times we will need to bear in mind that we will need to ensure we can demonstrate that our approach is both achievable and deliverable in the plan period.
- 2.25. What is clear is that we should continue the approach used in both the adopted and emerging draft local plan of including various clauses/hooks in policy to allow any community who wish to promote sustainable development other than that provided for in local plan strategy to do so through a neighbourhood plan (and/or alternative community led mechanism). To plan for any housing provision, as already discussed, neighbourhood plan groups will need the housing requirement figure from us to work from. In this way we will continue to support, encourage and facilitate communities to make meaningful use of neighbourhood planning, and other appropriate tools available to them, to address specific identified local needs and requirements in shaping the future of their areas.

3. Possible options for methods to calculate housing requirements for designated neighbourhood areas

- 3.1. Table 1 below sets out possible options for methods that could potentially be used to calculate housing requirement for designated neighbourhood area. These are informed by officer work so far to consider the Government’s requirement and guidance and approaches taken by other LPAs and Local Plan Inspectors.
- 3.2. This work is on-going therefore and this information is provided for indicative purposes only at this stage and is not-exhaustive, and not all are mutually exclusive.
- 3.3. These options would be subject to the tests relating to the 5 questions in the SPC report Next Steps section, which have their basis in the tests of soundness i.e. is the plan/policy positively prepared; is it justified (i.e. proportionate evidence); is it effective (i.e. deliverable), and; is it consistent with national planning policy.
- 3.4. In all options, it is suggested it is reasonable to expect that the following would also be considered:
 - a. population in the neighbourhood area;
 - b. consistency with Local Plan spatial strategy,
 - c. potential deliverability.
- 3.5. Options based on completions, commitments, and local plan and neighbourhood plan allocations either have considered or will need to take account of physical, environmental or infrastructure constraints to future growth in a given Neighbourhood Area.

³ National Planning Policy Framework – paragraphs 18 and 29

Table 1 Possible options for methods to calculate housing requirements for designated neighbourhood areas

Method Option	Comment
<p>1. Count all supply sources over the whole plan period (2020-2040) i.e. completions, commitments, Local Plan allocations, Neighbourhood Plan allocations, appropriate allowance for windfalls.</p>	<ul style="list-style-type: none"> • Includes all supply sources. • Most comprehensive option, but does this satisfy the Government requirement for the figure to represent 'expected' scale of development, when it includes an element of dwellings already built? • Including windfalls could be difficult to robustly / meaningfully calculate at DNA geography. • E.g. Mole Valley Local Plan – approaching Main Modifications at Examination (as at end January 2023).
<p>2. Count supply sources for the future – from a set Monitoring Point (2022, or 2023) to 2040 i.e. excluding completions.</p>	<ul style="list-style-type: none"> • Method omits completions and windfalls. • Requires agreement on the appropriate starting point. • Although the same method will apply to all DNA's, communities that have seen significant development in recent years may feel that not including completions since 2020 does not provide an accurate reflection of the scale of development in their areas. • If windfalls were included this could be difficult to robustly / meaningfully calculate at the DNA geography • E.g. Babergh and Mid Suffolk Joint Local Plan (at Examination as at end January 2023)
<p>3. Count allocations only to reflect new planned development, together with an appropriate allowance for windfalls – options here to include Local Plan allocations only or Local Plan and Neighbourhood Plan allocations</p>	<ul style="list-style-type: none"> • Method : Local Plan Allocations only • This focuses on what the emerging Local Plan proposes, is less complex and more easily understood. However, as above it may exclude significant development that has, or is still to come, from the picture in some DNAs. • As above, including windfalls could be difficult to robustly / meaningfully calculate at DNA geography. • E.g. Bath and North East Somerset LP Partial Update (adopted 19 January 2023)
<p>4. Count Neighbourhood Plan allocations only (excluding any completions before 1 April 2020) – possibly together with an appropriate allowance for future windfalls</p>	<ul style="list-style-type: none"> • Method : Neighbourhood Plan allocations only • This reflects a potentially different interpretation of the Government guidance in terms of what development is expected through the neighbourhood plan process. • As above, windfalls could be difficult to robustly / meaningfully calculate at DNA geography. • E.g. Purbeck LP (At Examination) –
<p>5. Non-supply side, mathematical approach, for instance based on assigning a share of</p>	<ul style="list-style-type: none"> • A top down approach that is more about apportionment.

Method Option	Comment
<p>population and a share of any settlement tier housing growth from LP allocations.</p>	<ul style="list-style-type: none"> • Does not take account of any specific physical, environmental or infrastructure constraints to future growth in a Neighbourhood Area. • Comparison with local plan allocations results in some substantially 'negative' housing requirement figures (ie more LP allocations than requirement) which seems likely to cause confusion as to their meaning and application. • Possibility/probability of the apportioned figures being in conflict/out of step with the spatial strategy, which the Neighbourhood Area housing requirement figure must support if it is to adhere to Government requirement/ guidance. • E.g. South Worcestershire Local Plan Review (SWDPR) (Regulation 19 stage closed 23 December 2023)

- 3.6. There may also be variations of these, for example, whether it is sensible or even possible to make justified allowance for windfalls in any of the options needs to be explored, so each option potentially has an 'excluding windfalls' variation. Windfalls are sites without planning permission as at a set monitoring point.
- 3.7. We have completions commitments and total windfalls forecast as at the 2022 Monitoring Point (31 March 2022). This data would need to be updated when the 2023 Monitoring Point data becomes available. Likewise, Local Plan allocations would be updated when the Regulation 19 stage plan is approved by Council.
- 3.8. One approach suggested by objectors to Regulation 19 plans, but not proposed by local planning authorities is to base designated neighbourhood area housing requirement figures on a figure that has strong local community support i.e. based on popularity. This is not considered a realistic option from the outset as "popularity" does not fall within the tests of soundness or legal tests.
- 3.9. Another approach is to include only indicative housing requirement figures in the plan, (based on apportionment of planned rural growth, based on latest population estimates) but not included in Strategic Policy. This approach is being used by the East Northamptonshire Local Plan (Part 2) which is currently at Examination. Given PPG, and recent Inspectors' questions elsewhere, officers would query how this can be compliant and is therefore not currently considered to be a reasonable option.

4. Next Steps

- 4.1. Despite all the ambiguity and potential complexity, it is clear that (a) we must do this exercise and (b) that it should assist our neighbourhood planning communities. The intention is to keep our approach to it as simple/proportionate yet robust as possible. It appears we have some flexibility as a result of the lack of specificity and prescription by the Government on methodology and any consistent model emerging from local plan examinations to date, but ultimately we will have to justify and evidence our method.
- 4.2. It is Officers suggestion that the following 5 questions will need to be addressed in determining, including through consultation with others, the best way forward:

1. What method is effective in helping neighbourhood plans to encompass housing provision, including deliverable housing site allocations?
 2. What is the simplest effective method to understand and use for plan-making, development management and development monitoring?
 3. What method is justified, sustainable and reasonable for neighbourhood planning across East Devon for the local plan period?
 4. What method is consistent with the Local Plan being positively prepared, i.e. in supporting vision, objectives and spatial strategy for growth and development?
 5. What method is consistent with NPPF and NPPG?
- 4.3. In order to address these questions and collate the necessary evidence/audit trail, we will need to identify the potential options for the method (likely to focus on supply based methods, but there are other methods), identify their advantages and disadvantages, and consult on them. This may include highlighting reasons why any methods might be discounted or preferred, and inviting consultees to put forward alternative method options for consideration.
- 4.4. Acceptance of the neighbourhood area housing requirement figures and the approach taken to them in our Local Plan is more likely to follow if we have undertaken an open and transparent consultation process that has involved neighbourhood plan groups from the early stages. In due course, the wider consultation will further engage with communities and stakeholders. Those engagement opportunities together with supporting evidence will help readers to understand what the figures mean in practice.
- 4.5. Through this paper we are seeking to raise Members' awareness of the need to calculate the housing requirements for designated neighbourhood areas; for such requirement figures to be included in strategic policy of the emerging local plan, and; the steps involved in progressing the associated work package. Flowing from this, we are seeking approval to open a dialogue with our neighbourhood planning groups/local councils, where neighbourhood areas are designated or actively being pursued.
- 4.6. The scope of this engagement will by necessity need to be specific to this matter, and not re-open consultation about any particular sites proposed for allocation in the emerging local plan, not least because the results of the recent Regulation 18 consultation need to be carefully considered alongside this work. Rather, the focus will be on advising neighbourhood plan communities about the designated neighbourhood area housing requirement; why we need to do this; exploring options for how it could be approached and what implications might need to be considered; endeavouring to answer any questions they may ask about it, and; gathering evidence on current thinking amongst neighbourhood plan groups as to their neighbourhood planning intentions.
- 4.7. Whilst there will no doubt be sensitivities in opening this dialogue with communities, delay to this part of the engagement could impact on the local plan's plan-making timetable and Officers recommend it should commence as soon as possible.
- 4.8. It is suggested that the early engagement with affected communities could best be done via a webinar initially, followed up with a short survey and 1 to 1 discussions if required. This will provide NPGs with a certain level of understanding before we go out to wider consultation. It will also inform the planning of this consultation, and support our duty to consider the relationship between neighbourhood plans/planning and the emerging local plan, and constructively engage with communities during the plan preparation process.

- 4.9. Finally, it is proposed that Officers will bring a further report and topic paper/proposed consultation documentation to Members after this initial engagement. This will report on the findings from it and provide further detail and technical information – including housing requirement numbers for each DNA for the identified method options and lessons learned from elsewhere - for consideration before entering a period of formal consultation to inform decisions on the final method selection.

Financial implications:

There are no financial implications

Legal implications:

There are no legal implications other than as set out in the report.