

Appendix 1:

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified in the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date [NPPF](#), [PPG](#), Written Ministerial Statements and the [National Model Design Code](#). To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#).

Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	<p>Broadly reflect national policy, excluding post 2012 requirements.</p> <p>Reference Toolkit Part 2</p>	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>The North Devon and Torridge Local Plan (adopted 2018) (“the Local Plan”) broadly reflects national planning policy as detailed in the PAS Toolkit Part 2.</p> <p>The Local Plan was prepared and examined against the 2012 National Planning Policy Framework (NPPF). The NPPF was subsequently subject to three revisions, which has resulted in some points of variance between national planning policy and the Local Plan.</p> <p>The following policy areas, where there is variance between the Local Plan and national guidance generally relate to policy omission.</p> <ul style="list-style-type: none"> • Traveller Accommodation– the Local Plan identifies a requirement for permanent Traveller pitches and transit sites, based on a 2014 assessment of need. The identification of sites to meet the evidenced need was to be determined by a Traveller Site Allocations DPD, as set out in the 2016 Local Development Scheme. The DPD has not been delivered and is not subject to a delivery programme within the current Local Development Scheme (2022). The intention being that this matter would be addressed as part of a comprehensive review of the Local Plan.

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			<ul style="list-style-type: none"> • Design Codes – the need for the preparation of design guides and codes post-dates the adoption of the Local Plan, on which basis there is no provision or reference to such in the Local Plan. • First homes - post-dates the adoption of the Local Plan, on which basis there is no provision or reference to such in the Local Plan • 10% Affordable home ownership - post-dates the adoption of the Local Plan, on which basis there is no provision or reference to such in the Local Plan. The matter was considered on introduction and the Councils have taken the view to not apply the 10% requirement having regard to NPPF paragraph 65 in that its application would result in significant prejudice to meeting identified affordable housing needs. • Town centres – increased flexibility is required to town centre policies to reflect the consequences of changes to the Use Class Order. • Five-year housing land supply – reference (A3) the Councils have not demonstrated a five-year supply of deliverable sites following an appeal decision in April 2020. Work is being undertaken to establish the deliverable supply position. • Identification of a Coastal Change Management Area. <p>Note the above only relates to current national policy requirements, no consideration is given to proposed planning reforms set out in the 2020 Planning White Paper.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The standard method indicates a minimum local housing need (for the joint plan area including Exmoor NP) of 759 dwellings per year (as per NPPG April 2022). This is less than the adopted local plan annual target of 861 (Policy ST08) which was derived using an approach that pre-dates the introduction of the standard method. The change in the local housing need figure represents a 12% decrease, from the Local Plan annual requirement, which could be considered a ‘significant’* decrease.</p> <p>Following a decrease in the local housing need figure it is appropriate to consider whether the adopted housing requirement remains to be deliverable. Of note the Local Plan housing requirement includes a significant uplift from the baseline demographic-based need, to accommodate enhanced levels of net inward migration generated from ambitious planned economic growth. In considering the deliverability of the housing requirement, it is appropriate to consider the continuing validity of assumed economic growth, as such is a key component of the housing requirement. It will be appropriate to review whether this requirement remains realistic given the changing economic circumstances identified in A6 (e.g., economic impacts of Brexit and coronavirus).</p> <p>Further investigation will be required to understand the drivers for hosting growth, both internal and external to northern Devon.</p>

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			<p>As per NPPG, there may be circumstances where it is appropriate to apply some form of economic 'uplift' to plan for more homes than the housing need figure indicated by the standard method. (2a-010-20201216). There should however be clarity and confidence that the uplift is achievable. As set out in A5, economic delivery rates to date on sites allocated for employment development has fallen short of the annualised target of 4.25 hectares.</p> <p>Delivery of the very modest level of housing for Exmoor is not considered to be a constraint or burden that would be a driver for review.</p> <p>The change in the housing need figure would not on its own be a reason to review the Local Plan. However, any plan review would need to start with the minimum local housing need derived from the standard method and consider whether any uplift on this figure would be appropriate, having regard to economic ambition and how such could be met.</p> <p>Of note NPPG only makes reference to 'significant change' in relation to an increase in the need figure: '...Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method...' (61-062-20190315). Accordingly, on the basis of national guidance, the reduction in need would not constitute a significant change.</p>

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A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>At the point of adoption, the Local Plan could demonstrate 6.4 years supply of deliverable housing sites (including a 20% buffer, with the application of the Liverpool method to address the historic under delivery). An Appeal decision, April 2020 (APP/W1145/W/19/3238460) established that the Councils could only demonstrate a deliverable housing supply of 4.23 years. Of note, the Councils presented an updated housing supply position (base date 1st April 2019) to the Inquiry that presented a supply position of 5.88 years using the Liverpool method and a 5% buffer and 5.15 years based on the same approach with a 5% buffer.</p> <p>Local Plan Policy ST21 provides the means by which the housing supply can be managed to maintain an appropriate supply of deliverable sites which includes that <i>“If monitoring identifies that it is not possible to demonstrate a five-year supply of deliverable land for northern Devon and there is no recovery of identified supply indicated for the two subsequent monitoring years, then a full or partial review of the Local Plan will be implemented.”</i> Having regard to the Inspector’s conclusions in the referenced appeal, in combination with a consideration of market conditions (significantly impacted by COVID), the Councils did not undertake actions to re-establish the five-year supply position over the period 2020/2022.</p> <p>At this time (September 2022), work is progressing to update the housing land supply position. The task commenced in March 2022 as part of a “soft launch” of the People and Place</p>

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			<p>Project, which introduced the intended review of the Local Plan and sought participation across a range of activities, which included consultation on a draft HELAA methodology and a “call for sites”. Progress is being made on site evaluations based on the finalised methodology, which will produce an updated housing trajectory, programmed for completion in early 2023. The Councils are again working with the development industry to support the HELAA.</p> <p>Until the HELAA is concluded, the Councils are not in a position to publish a five-year housing land supply position. At this time the Councils cannot demonstrate a five-year housing land supply and thus in respect of NPPF para 75, must be considered out of date and it is not possible to indicate that such will be re-established as a result of the ongoing HELAA exercise.</p> <p>Of note, while not in itself a reason to review the Local Plan, the Councils’ five-year housing supply position is likely to be enhanced if it is assessed on the basis of the HDT with an updated start date, thus avoiding the burden of historic under-delivery and potentially a more realistic delivery rate within the current economic environment.</p> <p>Further work is required to establish the extent of deliverable housing sites across northern Devon; this work has commenced.</p>
A4.	You are meeting housing delivery targets	Agree	The adopted NDTD Local Plan plans for 17,220 new homes between 2011 – 2031

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	<p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>		<p>The housing delivery test (HDT) results for the joint plan area, since its introduction are:</p> <ol style="list-style-type: none"> 1. 2018 – 128%; 2. 2019 – 133%; 3. 2020 – 141% 4. 2021 – 142% <p>To date, the Councils have significantly exceeded HDT targets and there is no evidence to suggest ongoing delivery to the required level will not be achieved.</p> <p>Against this specific test, the Local Plan is fully meeting the HDT and therefore there is no requirement for an action plan to be prepared or to specifically trigger the presumption in favour of development in relation to the HDT. It is apparent that the Councils' position in respect of the HDT is secure. It is however important to recognise that at this time, irrespective of the over delivery against the HDT, a five-year supply of deliverable sites cannot be delivered, as set out in A3.</p> <p>Policy ST08 sets a housing requirement of 17,220, (861 dwellings per annum), which at the point of adoption was supported by a housing supply of 20,189, dwellings. Although not quantified it is assumed that supply figures have increased, in the absence of a five-year supply position from March 2020 as decision are made having regard to NPPF paragraph 11 (d).</p> <p>To date of 7,916 dwellings have been completed, as set out below, representing an under-delivery of 1555 dwellings, which equates to 16.4% of the requirement over the period</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>2011/2022. However, as of April 2022, across northern Devon, planning permissions provided a capacity for the delivery of 7,402 dwellings (dwellings on unimplemented sites, non-started dwellings on implemented sites and dwellings under construction). This permitted yield, will be added to by sites that will be consented subject to the resolution of S106 agreements and allocated sites which in whole or part have not been developed or to which a planning permission consent; it would be beneficial to understand the quantum of addition capacity provided by such sites.</p> <p>The table below shows annualised housing completions 2011/2022. It is apparent that there have been significant fluctuations in delivery rates during this time. The most significant shortfalls were in the early years of the plan period (prior to adoption), particularly the first 5 years, which in the main resulted from the transition from the previously adopted North Devon and Torridge Local Plans to the Local Plan, which included the emergence of draft allocations to address a developing housing requirement.</p> <p>It is apparent delivery targets can be achieved and exceeded as demonstrated below, with completions exceeding the annualised Local Plan requirement from 2017/2018 to 2019/2020. It is assumed that post 2020, delivery rates and confidence to bring forward sites would have been impacted by the consequences of COVID.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement				
			Table 1 housing delivery - northern Devon 2011/2022				
	Year	NDC	TD C	NDT	Requirement	Difference	Cumulative Difference
	2011/12	177	278	455	861	-406	-406
	2012/13	269	172	441	861	-420	-826
	2013/14	246	129	375	861	-486	-1,312
	2014/15	283	451	734	861	-127	-1,439
	2015/16	1	377	641	861	-220	-1,659
	2016/17	480	336	816	861	-45	-1,704
	2017/18	634	238	872	861	+11	-1,693
	2018/19	693	258	951	861	+90	-1,603
	2019/20	884	280	1,164	861	+303	-1,300
	2020/21	552	130	682	861	-179	-1,479
	2021/22	594	191*	785*	861	-76*	-1555*
	Total	5,076	2,840	7,916			

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>It is evident from the above that there have been fluctuations in delivery rates across the Councils, which is reflected in the Local Plan housing trajectory, and that across the plan area there will be an equalisation of delivery over the plan period. This is evident by number of planning permissions by Council area to make up the above referenced 7,402 permissions, of which 3,245 are located in North Devon and 4,148 in Torridge.</p> <p>Until a revised housing trajectory is published, it will not be possible to assess this question further. However, given the ongoing increase in achievement of the HDT, it can be reasonably assumed that this measurement will continue to be met. Further with regard to achieved and consented development, it is apparent the supply of housing sites is not an obstacle to development.</p>
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Disagree	<p>The most recently published AMR is for the period 2019/2020, which was prepared on a joint basis.</p> <p>Affordable Housing The Local Plan (Policy ST18) provides an expectation that 30% of houses on qualifying sites should provide affordable homes. The thresholds for qualifying sites, as currently applied varies from the stated units in Policy ST18 (a) and (b) to reflect NPPF para 64. The adjusted position, as enabled by Policy ST18(1) is clarified in an Affordable Housing SPD.</p> <p>The Local Plan HEDNA (CE21- May 2016) sets out an estimated annual level of Affordable Housing Need of 345 dwellings per annum (northern Devon). In setting the 30%</p>

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			<p>target, it was recognised that given the scale of need, such could not be delivered by the planning system alone.</p> <p>The below table sets out the achieved affordable housing delivery and the percentage of affordable housing delivered as a component of all completions on an annualised basis 2011/2022.</p> <p>Table 2: Affordable Housing Completions, across northern Devon 2011/2021</p> <table border="1" data-bbox="1227 603 2085 1177"> <thead> <tr> <th>Year</th> <th>Affordable Housing Completions</th> <th>All Housing Completions</th> <th>% all new homes that were affordable</th> </tr> </thead> <tbody> <tr> <td>2011/2012</td> <td>130</td> <td>455</td> <td>28.6%</td> </tr> <tr> <td>2012/2013</td> <td>70</td> <td>441</td> <td>15.9%</td> </tr> <tr> <td>2013/2014</td> <td>126</td> <td>385</td> <td>33.6%</td> </tr> <tr> <td>2014/2015</td> <td>199</td> <td>734</td> <td>271%</td> </tr> <tr> <td>2015/2016</td> <td>92</td> <td>641</td> <td>14.4%</td> </tr> <tr> <td>2016/2017</td> <td>151</td> <td>816</td> <td>18.5%</td> </tr> <tr> <td>2017/2018</td> <td>92</td> <td>872</td> <td>10.6%</td> </tr> <tr> <td>2018/2019</td> <td>187</td> <td>951</td> <td>19.7%</td> </tr> <tr> <td>2019/2020</td> <td>214</td> <td>1,164</td> <td>18.38%</td> </tr> <tr> <td>2020/2021</td> <td>111</td> <td>682</td> <td>16.27%</td> </tr> <tr> <td>2021/2022</td> <td>154</td> <td>785</td> <td>19.18%</td> </tr> </tbody> </table> <p>It is important to note that affordable housing will not in whole or part, be delivered from all housing sites, by virtue of their size and nature and the impact of viability considerations. The below tables, 3 (Torrige) and 4 (North Devon) provide an improved indication of the effective implementation of</p>	Year	Affordable Housing Completions	All Housing Completions	% all new homes that were affordable	2011/2012	130	455	28.6%	2012/2013	70	441	15.9%	2013/2014	126	385	33.6%	2014/2015	199	734	271%	2015/2016	92	641	14.4%	2016/2017	151	816	18.5%	2017/2018	92	872	10.6%	2018/2019	187	951	19.7%	2019/2020	214	1,164	18.38%	2020/2021	111	682	16.27%	2021/2022	154	785	19.18%
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			<p>affordable housing policy, by setting out the consented affordable housing yield on qualifying sites.</p> <p>In respect of Torridge, monitoring from August 2016 – September 2021 Table 3 provides an analysis of affordable housing secured having regard to the related policy requirements.</p> <p>Table 3: Data summary policy compliant development sites for affordable housing (AH) in Torridge</p> <table border="1" data-bbox="1227 608 2101 1278"> <thead> <tr> <th data-bbox="1227 608 1435 831"></th> <th data-bbox="1435 608 1574 831">Total AH sites</th> <th data-bbox="1574 608 1740 831">% Sites with policy compliant AH provision</th> <th data-bbox="1740 608 1928 831">Average on-site AH provision on non-compliant sites</th> <th data-bbox="1928 608 2101 831">Average on-site AH provision - all sites</th> </tr> </thead> <tbody> <tr> <td data-bbox="1227 831 1435 943">Permissions on NDTLP allocations</td> <td data-bbox="1435 831 1574 943">30</td> <td data-bbox="1574 831 1740 943">47%</td> <td data-bbox="1740 831 1928 943">15%</td> <td data-bbox="1928 831 2101 943">19%</td> </tr> <tr> <td data-bbox="1227 943 1435 1129">Permissions on unallocated qualifying sites.</td> <td data-bbox="1435 943 1574 1129">30</td> <td data-bbox="1574 943 1740 1129">70%</td> <td data-bbox="1740 943 1928 1129">8%</td> <td data-bbox="1928 943 2101 1129">29%</td> </tr> <tr> <td data-bbox="1227 1129 1435 1278">All permitted sites assessed for AH delivery</td> <td data-bbox="1435 1129 1574 1278">60</td> <td data-bbox="1574 1129 1740 1278">58%</td> <td data-bbox="1740 1129 1928 1278">14%</td> <td data-bbox="1928 1129 2101 1278">21%</td> </tr> </tbody> </table>						Total AH sites	% Sites with policy compliant AH provision	Average on-site AH provision on non-compliant sites	Average on-site AH provision - all sites	Permissions on NDTLP allocations	30	47%	15%	19%	Permissions on unallocated qualifying sites.	30	70%	8%	29%	All permitted sites assessed for AH delivery	60	58%	14%	21%
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			<p>In respect of North Devon monitoring from April 2017 – March 2022 Table 4 provides an analysis of affordable housing secured having regard to the related policy requirements.</p> <p>Table 4: Data summary policy compliant development sites for affordable housing (AH) in North Devon</p> <table border="1" data-bbox="1227 496 2085 1385"> <thead> <tr> <th data-bbox="1227 496 1397 754"></th> <th data-bbox="1397 496 1568 754">Total AH sites</th> <th data-bbox="1568 496 1738 754">% Sites with policy compliant AH provision</th> <th data-bbox="1738 496 1908 754">Average on-site AH provision on non-compliant sites</th> <th data-bbox="1908 496 2085 754">Average on-site AH provision - all sites</th> </tr> </thead> <tbody> <tr> <td data-bbox="1227 754 1397 940">Permissions on NDTLP allocations</td> <td data-bbox="1397 754 1568 940">9</td> <td data-bbox="1568 754 1738 940">45%</td> <td data-bbox="1738 754 1908 940">17%</td> <td data-bbox="1908 754 2085 940">25%</td> </tr> <tr> <td data-bbox="1227 940 1397 1163">Permissions on unallocated qualifying sites.</td> <td data-bbox="1397 940 1568 1163">7</td> <td data-bbox="1568 940 1738 1163">29%</td> <td data-bbox="1738 940 1908 1163">17%</td> <td data-bbox="1908 940 2085 1163">17%</td> </tr> <tr> <td data-bbox="1227 1163 1397 1385">All permitted sites assessed for AH delivery</td> <td data-bbox="1397 1163 1568 1385">16</td> <td data-bbox="1568 1163 1738 1385">38%</td> <td data-bbox="1738 1163 1908 1385">12%</td> <td data-bbox="1908 1163 2085 1385">22%</td> </tr> </tbody> </table>						Total AH sites	% Sites with policy compliant AH provision	Average on-site AH provision on non-compliant sites	Average on-site AH provision - all sites	Permissions on NDTLP allocations	9	45%	17%	25%	Permissions on unallocated qualifying sites.	7	29%	17%	17%	All permitted sites assessed for AH delivery	16	38%	12%	22%
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			<p>While not meeting the target of 30% affordable housing contributions on all qualifying sites, the average delivery rate across all qualifying sites over the referenced periods is over 20%.</p> <p>Where non-policy compliant schemes are proposed, on the basis of expected contributions, submitted viability evidence is subject to independent scrutiny. A review of non-compliant sites indicated that the general basis for schemes not achieving the 30% requirement related to the nature of the site, significantly when brownfield/regeneration sites and in respect of greenfield sites, unforeseen abnormal costs and particularly on strategic sites, the need for significant infrastructure.</p> <p>Further analysis would be beneficial to provide a comparable time period across the two Councils, and to provide a more detailed understanding of the basis for the acceptance of less than 30% affordable housing on qualifying sites.</p> <p>Of note in Torridge more recent proposals are coming forward, including on strategic allocations (BID01: Bideford West Urban Extension – 750 dwellings and pt. NOR02: Site West of Buckleigh Road 400 dwellings) and further schemes have resulted in affordable housing uplifts consequent of the viability being re-appraised and challenged through independent review.</p> <p>While schemes continue to be presented with less than 30% affordable housing, there seems to be an improving trend</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>towards achieving the sought 30% of affordable housing on qualifying sites. An analysis of recent applications would assist with the indication of trends.</p> <p>Of note the Local Plan (Policy ST19) provides for the delivery of affordable housing on an exceptions basis in rural areas, on the basis of affordable housing-led schemes. The Councils have not however implemented this policy when the five-year supply could not be demonstrated, consequently, when sites come forward on what would have been an exception site, where they met the qualification, only 30% affordable housing can be sought. Policy ST19 is currently ineffective.</p> <p>The requirement for First Homes introduced by a WNS (24thMay 2021) post-dates the adoption of the Local Plan, and thus no policy provision on this matter is provided. The referenced SPD, in commenting on First Homes (paras 4.29-4.35) indicates that the implementation of First Homes in northern Devon will be addressed as part of the review of the NDTLP.</p> <p>Economic Development The Local Plan, Policy ST08: Scale and Distribution of New Development in Northern Devon, makes provision for the delivery of 84.9 hectares of employment land, with targets by location. Policy ST11: Delivering Employment and Economic Development, additionally provides for the exceptional release of land for employment to meet a defined relocation or expansion need.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>The 84.9 hectares is made up of allocations, subject to site specific policies and the balance of undeveloped sites within existing employment sites.</p> <p>Updated information is required to respond to this matter. The latest information on sites allocated for employment development is for the period 2011/2019. It would be beneficial for this information to be updated to cover the period not 2011/2022.</p> <p>During the period 2011/2019 17.75 hectares of allocated employment land was developed for economic development (as defined in the Local Plan). This scale of development fell significantly short of the expected scale of development, which at an annualised rate would equate to 42.5 hectares. At April 2019, there were 67.15 hectares of undeveloped land allocated as employment sites.</p> <p>In Torridge, development on sites contributing to the 84.9-hectare target have been focused on existing industrial/business estates, which are now predominantly built out. In contrast, in North Devon, the majority of the employment allocations are on new strategic allocations which have yet to be built out. To date, 64.77ha of the employment allocations remain undeveloped. Development opportunities remain on the following basis.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement																							
			<p>Table 5 Undeveloped Local Plan sites allocated for employment development (September 2022)</p> <table border="1" data-bbox="1227 347 2101 1361"> <thead> <tr> <th data-bbox="1227 347 1417 647">Settlement</th> <th data-bbox="1417 347 1626 647">Location /Allocation</th> <th data-bbox="1626 347 1834 647">Undeveloped area (ha) available for economic development</th> <th data-bbox="1834 347 2101 647">status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1227 647 1417 874">Barnstaple</td> <td data-bbox="1417 647 1626 874">Westacott Urban Extension (BAR 01)</td> <td data-bbox="1626 647 1834 874">1.9</td> <td data-bbox="1834 647 2101 874">Outline permission for 1.9ha rather than 5.0ha. Alternative use on balance</td> </tr> <tr> <td data-bbox="1227 874 1417 1023">Barnstaple</td> <td data-bbox="1417 874 1626 1023">Larkbear Strategic Extension (BAR02)</td> <td data-bbox="1626 874 1834 1023">1.5</td> <td data-bbox="1834 874 2101 1023">No planning history</td> </tr> <tr> <td data-bbox="1227 1023 1417 1171">Barnstaple</td> <td data-bbox="1417 1023 1626 1171">Mount Sandford Green (BAR 04)</td> <td data-bbox="1626 1023 1834 1171">2.8</td> <td data-bbox="1834 1023 2101 1171">Outline Planning Permission for Innovation Park</td> </tr> <tr> <td data-bbox="1227 1171 1417 1361">Barnstaple</td> <td data-bbox="1417 1171 1626 1361">Glenwood Farm (BAR09)</td> <td data-bbox="1626 1171 1834 1361">0</td> <td data-bbox="1834 1171 2101 1361">Planning permission for an alternative use on site 0.8ha.</td> </tr> </tbody> </table>				Settlement	Location /Allocation	Undeveloped area (ha) available for economic development	status	Barnstaple	Westacott Urban Extension (BAR 01)	1.9	Outline permission for 1.9ha rather than 5.0ha. Alternative use on balance	Barnstaple	Larkbear Strategic Extension (BAR02)	1.5	No planning history	Barnstaple	Mount Sandford Green (BAR 04)	2.8	Outline Planning Permission for Innovation Park	Barnstaple	Glenwood Farm (BAR09)	0	Planning permission for an alternative use on site 0.8ha.
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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
			Barnstaple	Roundswell Business Park (BAR10)	8.8	<p>2.7ha developed. Range of applications within the undeveloped balance. The site subject to full planning application (73159) for the erection of 7 industrial units on land east of Liberty Road (south of Atlas Packaging). Atlas Packaging and adjoining land to the west has Full planning permission (55882) for 1 office building which has yet to be constructed. There is no active planning history on land west of Avery</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
						<p>House. On land south of Fishleigh Road, Hele Manor Business Park is completed although there is no active planning history on land to the immediate east of Hele Manor. Full planning permission (70730) for a new industrial building (use classes B1, B2 & B8) on land west of Golden Coast and the new foot/cycle bridge over the A361 is currently under construction. Development of land north of Fishleigh Road is completed.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
			Bideford	Atlantic Park , (BID01)	2	Wider site developed for a range of commercial uses.
			Bideford	Alverdiscott Road	2.5	Partial planning permission implementation, applicant developing the identified site in support of business expansion. Site benefits from planning permission for employment uses (B1, B2, B8).
			Bideford	Extension to Caddsdwn Business Park, Bideford (BID05)	4.37	Employment site part of a mixed used allocation. Application 1/0656/2020/OU TM, will be granted on completion of S106 agreement. Employment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
						uses relate to B2, B8 and E(g). Note loss of 2.13 hectares of employment capacity from policy requirement, subsequent to referenced planning application of 8 hectares; 1.5 hectares developed for leisure use.
			Braunton/Wrafton	Wrafton South Eastern Extension (BRA01)	9.0	Phase I 13 B1 Business units. Phase II 28 units for use classes e(g), B2 and B8 uses under constructure.
			Braunton/Wrafton	Land East and West of Staggers Lane (BRA02A)	2.0	Outline planning permission (28208) for extension to existing industrial premises.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
			Great Torrington	East of Hatchmoor (GTT02)	4.0	No planning history
			Holsworthy	Dobles Lane Industrial Estate extension (HOL04)	2.1	No planning permission history.
			Holsworthy	Agri – Business Park (HOL01)	2.5	Site subject to partial implementation. Outstanding balance limited to proposals for agricultural related retail development.
			Ilfracombe	Southern Extension (ILF 01)	1.0	Site subject to outline planning permission
			Ilfracombe	Mullacott Business Park (ILF04)	3.2	0.8ha built. Land allocated for additional economic uses are confined to the remaining undeveloped pockets within the existing business park

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
						<p>that have yet to come forward. Land to the immediate south of St. Austell Brewery is being developed to provide 10 light industrial units (58186), 7 units are built. Land west of Commercial Point has full planning permission (73472) for a caravan storage area. Land to the east of the existing Business Park (approximately 2 ha) is safeguarded for further economic use, if required during the plan period.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
			South Molton	Pathfields Business Park (SM03)	12.8ha	Outline planning permission (60780 & 66843) approximately 7.3 hectares for employment use (Phase IV – east of Hacche Lane) (various Reserved Matters applications have been approved for individual plots which are currently under construction (3.4 ha)). There is no active planning history on land west of Hacche Lane other than the outline planning permission (60780) to deliver the road link. An additional area

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement			
						of land to the west of Hacche Lane of approximately 3 ha is safeguarded for economic uses if required during the plan period.
			<p>In Torridge, existing industrial estates (Bideford - Caddsdawn, Clovelly Road and Atlantic Park, Great Torrington - Hatchmoor and Holsworthy – Dobles) have been principally built out. Opportunities for new development, are focused on new sites which require opening up through servicing. In North Devon there are a range of opportunities within existing industrial estates and business parks, and on sites which are being opened up for development.</p> <p>At this time the total area of undeveloped employment land, allocated for this use amounts to 60.47 hectares. However, as indicated by the commentary in Table 5, there is significant interest and activity across employment sites in the majority of centres.</p> <p>While economic development has not met the annualised target, allocated sites are considered to continue to provide the most suitable sites for this use, all are well located to existing employment activity. The allocated sites were assessed as suitable and the preferred locations for economic development</p>			

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>through the preparation of the Local Plan; all are contained within or extend existing employment estates. The sites are considered to continue to provide the most appropriate options for economic development. Further, active market interest has been expressed on a number of the above allocations, which if progressed would result in the majority of allocated sites being delivered within the plan period.</p> <p>The suitability and availability of sites allocated for economic development is not considered to be an obstacle to delivery.</p>
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The economic context within which the Local Plan operates has been subject to change since its examination and even subsequent to its more recent adoption.</p> <p>The delivery of the Councils' ambitious growth plan been impacted both by a period of austerity and more recently COVID-19. However, while such influences may have affected the scope and scale of growth to date it is asserted that the Local Plan continues to enable wide ranging economic development to meet the Councils' growth ambitions and provides policy flexibility to respond to a changing economic environment.</p> <p>No significant employers have recently shut down or moved out of the area. Although in Torridge there have been fluctuations of fortune with a significant employer, namely Appledore Shipyard in recent years, however with a recent</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		<p>change of ownership, Government investment and defence commissions secured, expectations are that the shipyard has increased security as a local employer and will continue to make a significant contribution to the local economy.</p> <p>The structure of the local economy, across northern Devon, is very much focused on SMEs. At this scale there have also been no significant employment losses as a result of closure or relocation; in fact, there is a significant demand from local business seeking opportunities for new or expansion opportunities within the plan area.</p> <p>The response to A5, sets out the outstanding employment opportunities on sites allocated for/making a contribution to the employment land requirement of 84.9 hectares. In recognising that the annualised rate of economic development has not been achieved to date, such is considered not to be a reflection of the suitability of allocated sites or how the Local Plan supports the delivery of economic development, both on allocated and other suitably located sites.</p> <p>The policy context provided by the Local Plan is considered to reflect established economic ambitions; it is not considered to be an obstacle to economic growth. As set out in A5 there is an expectation that the majority of sites allocated for economic development will come forward during the plan period. There is no evidence suggesting that the employment allocations are no longer required or unlikely to be delivered.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Local Plan viability evidence dates from 2015/2016 (Examination Documents CE24/25). It is recognised that this evidence will be required to be revisited as part of a plan review; taking account of current economic conditions and market demand.</p> <p>At this time the Council are not a Community Infrastructure charging authority.</p> <p>Of note BCIS All-in Tender Price Index has seen a 10.9% increase since adoption of the plan (Nov 2018 – Aug 2022), with a 64.1% increase over the wider plan period to date (May 2011 – Aug 2022). In recognising the increasing costs associated with site delivery, it is also apparent that the strength of the local housing market is enabling the majority of qualifying housing sites to deliver fully compliant schemes.</p> <p>Clearly, while viability is an important consideration, the Local Plan enables the delivery of suitable sites for development having regard to site-specific issues and market conditions that would impact viability. The Councils seek to ensure policy requirements to the maximum extent, while enabling delivery on allocated and other appropriate sites.</p> <p>The Local Plan, reflecting planning practice guidance allows for a consideration of site viability to enable housing delivery. In considering proposals which are not policy compliant, the Councils will seek to ensure maximum gains can be achieved,</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>without prejudicing delivery, which will include ensuring viability appraisals are up to date at the point of decision making and where appropriate review mechanism are put in place.</p> <p>Analysis of housing development prepared in summer 2021 identified that from 2016, 58% of sites in Torridge eligible for requiring affordable housing provision secured policy-compliant levels of provision; achieving on average 21% rather than the 30% policy requirement. More recently, there is some evidence to suggest improved development viability on housing schemes, witnessing a shift back towards securing policy-compliant levels of delivery.</p> <p>In North Devon, analysis of housing development prepared in spring 2022 identified that from 2017, 38% of sites in North Devon eligible for requiring affordable housing provision secured policy-compliant levels of provision; achieving on average 22% rather than the 30% policy requirement.</p> <p>As indicated in A5, further analysis of the basis for the under-delivery against the 30% would be beneficial.</p> <p>Whilst viability has had an impact on the levels of affordable housing achieved, there is no evidence to suggest that development viability is constraining or precluding development from being realised across northern Devon; with key allocations across the plan area being progressed towards delivery and many now on site. As set out in A8, key infrastructure required to support delivery is being achieved in a timely manner, viability considerations have not prevented</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>the key infrastructure projects being delivered with the associated projects.</p> <p>Key infrastructure identified for delivery in association with allocations have and are being delivered as required, either funded directly from development, or with the support of external funding. It is recognised that against the Infrastructure Delivery Plan, some proposed schemes have not come forward against the anticipated timeframe. However, all infrastructure requirements necessary to support site delivery are/have been achieved alongside the associated development.</p> <p>The viability evidence will be required to be updated to support a comprehensive review of the Local Plan, taking account of changing economic conditions (see A6) and the impact on development viability, together with additional infrastructure requirements (such as health), which were not previously considered.</p> <p>It is considered that the Local Plan continues to work effectively with regard to how viability is assessed to enable its strategic and development objectives to be achieved. The Local Plan continues to work within the parameters of national guidance, which allows for variance against policy requirements to respond to viability considerations.</p>

<p>A8.</p>	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	<p>Agree</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Appendix 1 to this Toolkit (provided as Appendix 3 to the covering report) provides an update on key site allocations for the main centres across northern Devon (Barnstaple, Bideford, Braunton and Wrafton, Fremington and Yelland, Great Torrington, Holsworthy, Ilfracombe, Northam and South Molton).</p> <p>At this time, it is recognised that the delivery of some strategic residential/ mixed use sites is slower than had been projected; as set out in the Local Plan’s housing trajectory. As provided in A5 there have been fluctuations in development rates across the plan period to date, which in part has been influenced by the more gradual progression of the larger sites against projected delivery.</p> <p>However, with increasing confidence in the acceptance of allocated sites, through Local Plan submission (2016) and then adoption (2018), developer interests have progressed on a significant number of key sites; as indicated in Appendix 1 to this Toolkit (provided at Appendix 3 to the covering report). Key sites are now coming forward, with developers/house builders seeking and achieving Full and RM applications on allocated sites, with recently consented sites being implemented. There appears to be a positive step change in delivery over the short to medium term on key sites, which will drive forward the achievement of the Local Plan’s spatial strategy, to achieve local visions in accordance with settlement-based development strategies.</p>
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			<p>It is recognised that at this time a number of allocated sites have no evidence of developer interest and that a number of the larger strategic sites will be finalised beyond the plan period. This position is reflective of the Local Plan Housing Trajectory, which recognised extended delivery rates on larger sites and the timeframes of owners/developers interests in bringing sites forward for development.</p> <p>It is anticipated that key sites will be delivered to support the spatial strategy. There is no evidence to indicate that these sites will not be delivered to achieve the Local Plan's spatial strategy.</p> <p>Of note, clarification on delivery rates across allocated and other sites will be achieved as a result of work currently undertaken on a Housing and Economic Land Availability Assessment (HELAA).</p>
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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Both North Devon and Torridge signed up to the Devon Climate Change Declaration in 2019 (post Local Plan adoption) which sets the aim of Devon becoming carbon neutral by 2040. How the Councils will respond to this declaration, in respect of the Local Plan will require further consideration. The Councils are in a similar position with regard to The Devon Carbon Plan, which was adopted post Local Plan adoption.</p> <p>Technical evidence relating to Flood Risk Zones/coastal change is in preparation; the consequences for the Local Plan are therefore not yet defined.</p> <p>The Environment Act will require 10% biodiversity net gain; while the Local Plan does not include this level as a target, it requires all new development to provide a net gain in biodiversity, wherever possible. The absence of a current target is not seen as an obstacle to delivery having regard to existing policy provisions.</p> <p>With regard to environmental/heritage assets, there are no changes which are considered to be prejudicial.</p> <p>In conclusion, in the main, the Local Plan is considered to work within the national framework in respect of environmental/heritage assets. However, moving forward the consequences of the Devon Carbon Plan will be a matter for review.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>No new sites have become available which would require a review of the spatial strategy of the Local Plan. However, it is recognised that a number of sites have been granted consent outside the scope of planned development, in the absence of a deliverable five-year housing supply, which may impact on the local visions and development strategies. Further investigation would be required to appreciate the impact of unplanned development on local visions and development strategies.</p> <p>Identified need as evidenced by the North Devon and Torridge HEDNA is fully met by allocations and other commitments provide for in the Local Plan. As indicated in A4, built sites and opportunities for future development exceed the housing requirement of 17,220 dwellings. Housing needs can be fully accommodated by the combination of built, consented and allocated sites.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Infrastructure Delivery Plan (IDP) prepared to support the Local Plan was prepared in 2016. The IDP will need to be reviewed, in conjunction with all relevant stakeholders if the Local Plan is updated. It would, however, be beneficial to undertake a review of current priorities to provide an updated delivery programme and maintained requirements – such as the need for the planned education provision, in light of projected changes in pupil numbers.</p> <p>The Councils are achieving contributions to, and the direct delivery of infrastructure required to support planned development, in accordance with the IDP. As set out in A7, key infrastructure projects are being delivered in a timely manner to support the delivery of development, but with the recognition that there has been some delay in delivery on allocated sites and consequently the timeframe for the delivery of infrastructure projects.</p> <p>The progression of key infrastructure projects is not considered to be prejudicial to the spatial strategy.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>It is important to recognise that the Local Plan was relatively recently adopted (October 2018), but that it was determined to be sound against the 2012 NPPF. As set out in A1 there are a range of policy matters which have arisen as a result of the subsequent publication of further national planning policy.</p> <p>It is considered that the Local Plan, continues to work effectively to achieve the delivery of its spatial strategy. As indicated above (A1) there are a number of policy matters that would need to be reviewed to address areas where the Local Plan is currently silent, or where a revised policy approach would be required, such as in relation to town centres following changes to permitted development rights. The scope of these policy areas is regarded as limited and would not be prejudicial to the Local Plan's strategy. As in determining all applications the NPPF is used in combination with the Local Plan to ensure the decisions are made with regard to an up-to-date policy approach .</p> <p>The majority of appeals are consequent of the Councils' inability to demonstrate of five-year supply of deliverable housing sites (both prior to adoption of the Local Plan and following the appeal referenced in A3). There have been a range of outcomes, but in respect of this matters, appeals have generally, but not always, been allowed having regard to NPPF paragraph 11.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>There are no apparent other policy areas which are being regularly and successfully challenged at appeal. It would be beneficial to undertake analysis of appeal decisions to appreciate if there are policies which are judged to be ineffective/out of date, beyond those associated with the five-year housing land supply position.</p> <p>There are no specific policy areas that could be considered to be ineffective or not easy to understand with regard to the decision-making process.</p> <p>However, through discussions, at meetings of the now disbanded Local Plan Working Group, member visioning workshops and Plans Committees, it is apparent that a number of Members seek the review of the policy approach to development opportunities in the rural area, significantly in respect of housing and tourism. This matter together with the following issues were identified as policy areas that would benefit from consideration in a plan review, when the TDC and NDC agreed to undertake a comprehensive review and update of the North Devon and Local Plan:</p> <ul style="list-style-type: none"> • declarations of Climate and Biodiversity emergencies; • changing patterns for use of town centres and retail habits; • evolving thinking on rural sustainability; • increasing emphasis on environmental considerations and carbon saving; • the challenges of maintaining a housing land supply; • issues of coastal erosion and flooding; • the delivery of affordable housing and wider housing affordability;

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<ul style="list-style-type: none"> • changing work patterns – including increases in home working; • significant structural reforms to the agricultural sector; and • a changing context for the tourism sector. <p>Local Plan policies, as considered in Part 2 of the Toolkit, remain generally compliant with the provisions of national planning policy and guidance. However, irrespective of the level of technical compliance, there has been an indication from some Members that specific policy elements should be reviewed and revised and on a wider level, that the Local Plan should be subject to review and a comprehensive update, as indicated above.</p>
A13.	<p>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ol style="list-style-type: none"> 1. Review emerging and adopted neighbouring authority development plans and their planning context. 2. Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. 3. Review any relevant neighbourhood plans 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Across northern Devon three Neighbourhood Plans have been “made” (Great Torrington and Winkleigh (TDC) and Georgeham (NDC)). It is not considered that there are significant implications for the Local Plan.</p> <p>Mid Devon adopted its Local Plan in July 2020, making provision for a minimum of 7,860 dwellings over the period 2013-2033. In 2022 Mid Devon undertook a Regulation 18 (Issues and Options consultation) for a new Local Plan (2023 – 2043). Therefore, consideration of the impact of development proposals in northern Devon on the A361/Culm Grasslands in conjunction with development proposals in Mid Devon will need to be undertaken. Regulation 19 consultation is planned</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>4. Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities.</p> <p>5. Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</p>		<p>for May-June 2024. Mid Devon undertook Duty Co-operate discussions in May 2022.</p> <p>The Plymouth and South West Devon Joint Local Plan was adopted March 2019. No significant development is proposed that would impact on northern Devon.</p> <p>West Somerset Local Plan was adopted in 2016. An emerging Local Plan Review was published by Somerset West and Taunton in 2020, however, this project has been set aside with Somerset being established as a unitary authority. There is no published timetable for a new local plan.</p> <p>Exmoor (2017) and Cornwall (2016) Local Plans were adopted prior to the adoption of the North Devon and Torridge Local Plan. Exmoor undertook a five-year plan review in 2022, which concluded a review was not required (June 2022).</p> <p>Overall, there are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on North Devon/Torridge. The Councils will continue to work with neighbouring authorities to ensure that future reviews of the Plan meet Duty to Cooperate requirements.</p>
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p>	Agree in part	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The 2019 local elections returned Torridge District Council to no overall control. Torridge operates a non-executive form of Constitution with a modernised committee structure.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>6. Review any manifesto commitments and review the corporate and business plan.</p> <p>7. Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</p> <p>8. Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on.</p>		<p>In 2019, Liberal Democrats took control of North Devon Council, winning 21 of 42 seats. The Council had previously been under no overall control, with Conservatives forming a coalition with Independents.</p> <p>Of note local elections are scheduled for May 2023, which may result in a change of Membership and political control. The project plan for the progression of any review of the Local Plan will have to be mindful of the timings of key decisions in the lead up to these elections.</p> <p>Torrige District Council's Strategic Plan 2020-2023 was adopted October 2020. This includes a commitment to <i>'Review the North Devon and Torrige Local Plan to ensure that it remains relevant for good development that unlocks investment and opportunity, protects our important natural assets and helps to create strong and resilient communities'</i>.</p> <p>Priorities in the Torrige Strategic Plan relevant to the Local Plan include <i>access to good quality jobs and employment; increase availability of quality homes that meet local needs; reduce eco-footprint of the district.</i></p> <p>Priorities in the North Devon Corporate Plan relevant to the Local Plan include <i>increase the number of housing units and business space in the area, with minimum damage to the environment; encourage better digital and physical connectivity; drive up housing standards in the area and increase the number of affordable houses; explore ways in which we can bring forward sites for development that are allocated within the Local Plan.</i></p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>The Corporate priorities for the Councils are considered to remain consistent with the aims and objectives of the Local Plan. However, since the adoption of the Local Plan, both Councils have declared a climate emergency. Further work will be required to understand how this will impact on the Local Plan and discussions undertaken as to the approach to be taken with regard to how the Councils will “support our communities on a journey to a low carbon, sustainable and resilient future.”</p> <p>Of note as part early Member engagement on the People and Place project, visioning workshops were held to identify priorities in respect of issues and key components of a vision for northern Devon for the period to 2041. With regard to topic areas the following were identified as top priorities;:</p> <p>1st - addressing the affordability of housing 2nd - enabling economic growth 3rd - increasing resilience to climate change</p> <p>The range of issues to be address by a future vision included:</p> <ul style="list-style-type: none"> • Northern Devon has delivered a relevant mix of affordable housing stock, reflective of the needs of the community, allowing all those in the area who need a house to have a house. • Northern Devon's unique environment has been maintained and protected, allowing an increase in biodiversity.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<ul style="list-style-type: none"> • Northern Devon is now carbon zero and has exceeded climate targets. • Northern Devon has revolutionised transport throughout the area. • Businesses have been successfully encouraged to the area, which has helped to establish a vibrant and sustainable economy that provides skilled and higher paid jobs to the community. • We have listened and delivered what northern Devon wanted and needed, providing healthy and happy communities which are a better place to live and work. • Developed a place and community which supports the younger demographic. • Broadband has been upgraded within northern Devon. <p>In conclusion, political priorities, at a strategic level appear to be consistent with the aims and objectives of the Local Plan. However, there has been an expressed intention to review/update the Local Plan in response to a range of external and local issues, as referenced in A12.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p><u>If no</u> go to question A16.</p> <p><u>If yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>

A17.	<p><u>Decision:</u> Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <ul style="list-style-type: none"> • Changes in economic conditions due to coronavirus and Brexit • Changes in environmental context – climate change and Environment Act, respond to the Devon Carbon Plan etc • Non-compliance through omission and inconsistency of some policies with 2021 NPPF • Absence of a deliverable supply of housing sites • Evolving member/corporate priorities – rural growth, tourism, affordable housing, town centres • Commitment to plan review as part of latest corporate strategy (Torridge DC) <p>Other actions that may be required in addition to or in place of an update of plan policies</p> <ul style="list-style-type: none"> • Clarification of policies – e.g. in light of changes to PD rights etc • Re-establish 5-year housing land supply • Establish policy approach towards delivery of First Homes • Identify sites to meet needs for traveller provision 		
	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	No	No significant change in housing requirement based on standard method. Consider need for any economic ‘uplift’. A comprehensive review would enable the base date/plan period to be reset together with the housing requirement.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	No	The overall spatial strategy is considered fit for purpose with regard to the hierarchy of settlements and the distribution of development. However, a review of opportunities to address sustainable development in the rural areas has been

			identified as a policy objective by some Members; opportunities will need to be assessed and options provided.
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Yes	<p>Key omissions from the Local Plan that need to be addressed include coastal management, gypsy and traveller provision and some requirements relating to housing provision.</p> <p>Policies relating to economic and housing development may need to be updated to respond to changing economic conditions, reviewed Member priorities and to better reflect NPPF requirements (see Toolkit Part 2 and response to A1 above).</p> <p>Strategic policies will also need to be reviewed in light of environmental challenges including climate change and carbon reduction targets.</p>
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	Decision: Full Update of Plan Policies/ Partial Update of Plan Policies (delete as necessary) Reasons for scope of review:		

Date of assessment:	
Assessed by:	
Checked by:	
Comments:	