

The Herefordshire Local Plan: Environment and Sustainability

Meeting: Environment and Sustainability Scrutiny Committee

Meeting date: Wednesday 21 September 2022

Report by: Interim Service Director Planning and Regulatory Services

Classification

Open

Decision type

This is not an executive decision

Wards affected

(All Wards);

Purpose

The purpose of the report is to present information for the committee to consider the extent to which the preparation of the Herefordshire Local Plan will look to deliver the objectives for Environment and Sustainability, as outlined in the County Plan 2020-2024, Herefordshire Climate Change Emergency resolutions and Executive Response, and other relevant Council strategies and policies, including the Success Measures provided in the Council's County Plan 2020-2024.

In addition, the report sets out details of initial results which are emerging from the Local Plan Options consultations undertaken during 2022 and details of the scope and methods used during the consultation process.

Recommendation(s)

That:

- a) **The committee is assured that the Herefordshire Local Plan will help to deliver the Council's objectives for Environment and Sustainability, including the Success measures in the Council's County Plan 2020-2024; and**
- b) **The approach taken in regards to Herefordshire Local Plan consultations undertaken to date have been effective in enabling residents, stakeholders and other interested parties comment upon alternative spatial and policy options for the emerging plan.**

Alternative options

1. Should the Local Plan be prepared without including policies and proposals which take account of the need to address climate change, environmental protection and sustainability it would be considered contrary to national planning policy and therefore likely to be found unsound at examination in public (EIP).
2. Not undertaking appropriate consultation and engagement during the Local Plan process would mean that both the Local Plan regulations and Council's [Statement of Community Involvement](#) would not be complied with and the Local Plan would be likely to be found unsound at EIP or subject to a legal challenge.

Key considerations

Local Plan Process

3. The Herefordshire Local Plan will set out the Council's land-use policies and proposals for the period up to 2041 and will replace the existing Herefordshire Core Strategy, which was adopted in October 2015. The Local Plan will set out a strategy for the scale and distribution of growth across the County and will cover issues such as housing provision, the economy, retail and town centres, infrastructure provision and environment protection. It will set out the policies by which planning applications will be determined.
4. The Local Plan process is highly regulated and, once a draft plan has eventually been approved by the Council and formally published it will be subject to an independent Examination in Public (EIP) to determine its soundness. The specific tests of soundness which will be considered at the EIP are:
 - a. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. **Effective** – deliverable over the plan period, and based on joint working on cross-boundary strategic matters as evidenced by statements of common ground; and
 - d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF) 2021 and other statements of national planning policy.
5. In addition the Local Plan must also meet a number of legal requirements, which include:
 - being subject to a Sustainability Appraisal and a Habitat Regulations Assessment; and
 - a requirement to include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
6. Within the NPPF paragraph 11 indicates that the plan should:
 - a. be prepared with the objective of contributing to the achievement of sustainable development;
 - b. be prepared positively, in a way that is aspirational but deliverable;

- c. be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e. be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area
7. Taking account of c above during 2022 there have been three early consultation periods which have set out a number of different options for the direction the Local Plan could take:
- a. between 17 January and 28 February 2022 a consultation was undertaken on the overall spatial strategy and growth levels, high level spatial options for rural areas as well as consulting on a draft vision and objectives of the Local Plan;
 - b. from 4 April 2022 until 16 May 2022 a consultation was undertaken to consider possible options for the content of topic based policies across a wide range of subject areas; and
 - c. a place based options consultation took place between 13 June and 29 July 2022. This consultation set out possible options and/or potential strategic development areas for Hereford, each of the County's market towns together with a range of alternative settlement hierarchies for rural parts of Herefordshire.
8. In addition, a number of key evidence base studies have been commissioned which will be reporting in coming months. The assessment of the options (or alternatives) together with the development of a comprehensive evidence base will ultimately help to demonstrate that the Justified test of soundness has been achieved.
9. The Local Plan will also be subjected to a viability assessment to help demonstrate that its policies and proposals are deliverable and, when submitted, will also be accompanied by an Infrastructure Delivery Plan (IDP) which will set out detail around costings and funding of infrastructure and in order to move towards a future Infrastructure Levy.

Local Plan Options consultations 2022

10. The Spatial Options consultation undertaken in January and February set out a draft vision, supplemented by a set of more detailed objectives, which were intended to reflect the County Plan and support the Council's declaration of a Climate and Ecological Emergency. The draft vision and objectives can be viewed in the [Strategic Options consultation paper](#).
11. In respect of consultation upon the emerging Local Plan, the adopted [Statement of Community Involvement](#) sets out how the Council will engage with communities upon planning matters, including upon the preparation of development plan documents (Section 8). [The Commonplace digital citizen consultation platform](#) was used to display the consultation material and gather consultation responses. The Spatial Options paper and associated documents were also available on the Herefordshire Council website. Printed copies were made available on request. Posters and flyers were provided to all town and parish councils for their noticeboards and local parish magazines. Information points, including Talk Community Hubs and Libraries were be used to spread information about the consultation. Media releases were prepared and the Council's social media platforms were used publicise the consultation.
12. Notification of the consultation was also sent to the contacts on the extensive consultation database of specified organisations, other stakeholder organisations and individuals who have indicated they have an interest in the Local Plan process. An on-line event for town and parish councils was undertaken. This was recorded and published on the digital platform together with

the workshops held for Herefordshire Council members during the consultation.

13. With regards to the Settlement Hierarchy options, additional early consultation was undertaken. In February 2020, all parish councils were sent the '[Settlement Hierarchy Review Questionnaire](#)'. This sought to gather information on the current range of services and facilities within ever parish. The information was collated and parishes were asked to comment on '[Rural Settlement Hierarchy Services and Environmental Survey](#)' in April 2022. This was to ascertain the accuracy of the data prior to it be utilised for ranking settlements as part of the Place Shaping Options consultation in June/July 2022.
14. The Spatial Options were based on delivering the Objectively Assessed Needs of the County over the Local Plan period, taking into account the level of planning permissions in the County. This demonstrated the ambitions to have a plan which was positively prepared in respect of the tests of soundness - see documents at [Local Plan 2021 - 2041 – Herefordshire Council](#).
15. Over 1,200 responses were received to the Spatial Options consultation; a brief summary of the high level consultation results has been published on the [Commonplace site](#). The consultation responses received during the consultation were broadly in support of the draft vision and objectives with more than 60% agreeing with them.
16. In terms of the overall strategy Option 3 (Focus Growth across market towns and Hereford) was the most popular of spatial options, least favourite were the sub options of Option 4 which suggested focussing on a single market towns as a growth centre.
17. The [Policy Options consultation](#) undertaken from 4 April and 16 May 2022 set out a range of alternative policy approaches for key policy areas, many of which would look to address environmental priorities of the County Plan.
18. As with the earlier Spatial Options consultation, Commonplace was used as the digital platform for displaying the consultation material and enabling responses to be made. The use of digital tools for consultation is encouraged in the NPPF. The approach to consultation as set out in paragraphs 11 and 12 was followed, although during this consultation period there were two parish/town council events held. A [recording of the event](#), which included a presentation, was again published on Commonplace.
19. Fewer responses were made to the policy options consultation with around 250 responses being received. In terms of the policy options relating specifically to climate change and the environmental policies, the following list provides a summary of the results:
 - a. Questions on the approach to how the plan should address climate change with the majority of respondents (55%) supporting an approach that would set out an overarching strategic climate change policy combined with embedding the issue of climate change into other relevant policies.
 - b. Biodiversity/geodiversity – 48% of respondents were in favour of strengthening current policy placing more emphasis on biodiversity net gain and considering the scope of a higher than national percentage gain.
 - c. Historic environment – new approach with strengthened requirements regarding Heritage Impact Assessments and understanding of heritage assets (67%)
 - d. Landscape/Townscape – currently these are contained with one policy within the Core Strategy, however 45% of respondents considered that separation of policies for landscape and townscape would be appropriate. This would also link with the emerging approach to design coding nationally.

- e. Strong support for a new dark skies policy (77%). Many NDP have included policies within their plans regarding minimising light pollution for both character and wildlife benefits.
- f. Green Blue infrastructure – options were to provide for these issues to be covered within the Local Plan or devolved to local communities within their NDPs. There was no clear favoured approach with some elements being consistent with a strategy approach with the detail at a more localised level.
- g. Support for specific strategic design policies for Hereford and Market Towns supported by design codes in rural areas (60%)
- h. Strong support for separate nutrient neutrality policy (69%)
- i. In terms of policies promoting the provision of open space – 57% supported inclusion of more detailed requirements.

Further information regarding the results of the consultation can be found on the [Commonplace platform](#)

- 20. Given the results of this consultation, together with the content of the latest [National Planning Policy Framework](#), [Environment Act of 2021](#) and Herefordshire Council's own aspirations as set out in the County Plan, it is clear that there is a need to develop strategic policies to address the response to climate change and environmental protection, covering issues such as water quality.
- 21. As with previous consultations, the [Place Based consultation](#) from 13 June until 29 July 2022 utilised the Commonplace platform. The general consultation actions as set out in paragraphs 11 and 12 were again followed, including a [parish/town council event](#). In addition, a series of "roadshows" were held in Hereford and each of the market towns and in a number of villages across the County, which provided an opportunity to meet members of the Strategic Planning and Neighbourhood Planning teams and discuss the Options.
- 22. In respect of the distribution of new development this had been broadly based upon Option 3 which was the most popular of the Spatial Options. Potential areas for new housing, employment and mixed use developments were identified in Hereford and the market towns together with an outline of constraints and opportunities in each place.
- 23. Around 1,100 responses were received during this consultation; although the majority used the Commonplace platform to respond, many were also received in more detail via email. An extensive social media campaign was conducted which was seen by over 60,000 social media feeds. Around 3,700 people visited the Commonplace site during the consultation; most visitors being referred from a Facebook link or the Herefordshire Council website.
- 24. Some initial analysis work has been undertaken on the Place Shaping Option responses but this is ongoing and further analysis is required particularly around detailed submissions. 168 sites have been submitted as part of the 'call for sites' which occurred alongside the place based options consultation. With regards to Hereford, areas in the centre and to the north of the city were preferred within the responses with the least favoured areas being in the south. Again, in Bromyard, brownfield land and land to the north was preferred to options on the south side of the town. For Kington, it is clear that residents would prefer a mix of smaller sites than one larger development site, whereas in Leominster there was a preference for a larger strategic site. Within Ledbury, again brownfield development was preferred with the site to the north of the town being the least favoured option. Finally within Ross, brownfield redevelopment was preferred with areas to the south of the town being least favoured.
- 25. Responses in general highlighted a wish to see urban development that had access to medical and educational facilities as important and the availability of green open spaces and leisure related facilities nearby with an enhancement in landscape and ecology provided. Transport

connections within the existing town and to any new residential or employment areas were also indicated as essential.

26. In Rural Areas, respondents are favouring a more concentrated settlement hierarchy than the dispersed nature of the Core Strategy focussing on settlement with a higher level of services and facilities (59%). More respondents were keen to see development reduced within Areas of Outstanding Natural Beauty and Conservation Areas (53%) rather than those settlement be removed completely from the hierarchy (39%). The provision of affordable housing was considered to be important although the policy mechanism was split between the provision of a second tier of settlements (53% in favour of a second tier of settlement) and neighbourhood plans being given the flexibility to determine appropriate site allocations for affordable housing (74%). The majority considered the current proportional growth mechanism from determining parish growth was the more appropriate (79%).
27. There were a substantial number of comments regarding the rural section of the Place Options Paper particularly with regards to the mechanism of scoring and ranking settlements within the Rural Settlement Hierarchy Background Paper. Therefore, it is considered that a further engagement on preferred options and the issues of ranking settlements should be undertaken with parish councils and the local community in the autumn 2022.
28. Two sets of demographics were collected during this consultation; those responding on Commonplace (who provided the information) and a tally of those attending one of the roadshow events. The majority of people responding online were over 55 with the fewest respondent under 25 or over 85. About 450 people in total visited one of the roadshows, the highest proportion being over 50s but 20% were from the 30-49 age group.
29. The consultations undertaken to date are part of the first stage in a series of consultations that will continue up to and through the Examination in Public (EIP), as there are likely to be changes recommended by the Inspector which themselves will be subject to consultation. By 2023 it is intended to consult upon a draft plan which will enable representations to be made upon the detail of policies and proposals.

Evidence Base development

30. In addition to the three option consultations, a number of evidence base reports have been commissioned which will provide important evidence and recommendations as a basis for policy development. As with the testing of alternatives or options the preparation of these reports will help to demonstrate that the plan has met the “justified” test of soundness. A key commission with regards the environment and sustainability is the *natural environment study* intended to comprehensively update the evidence in relation to the County’s landscape character, green infrastructure, open space and ecology. This is complimented by a *playing pitch/sports facilities study* also underway. The ongoing work on the [Environmental Building Standards SPD](#) is also providing evidence and basis for Local Plan policy development.
31. Several of the evidence base reports will incorporate specific and targeted consultation/engagement with stakeholders, interest groups and local businesses, the results of these consultation exercises will inform the recommendations of the reports and in turn influence the policies of the Local Plan. Where there is a requirement to commission evidence base reports, or other services externally, these will be procured in accordance with the council’s contract procedure rules.
32. However, there is ongoing uncertainty about changes to the national planning system and what scope there will be for including topic based development management style policy within the Local Plan. Government have stated for some time their intention to provide a national set of

development management policies and that as a result they expect local plans to be shorter and focus on place based proposals. As a result of this uncertainty, desire to progress the local plan as quickly as possible and reluctance to undertake potentially abortive work, it is now proposed to develop the Local Plan in two parts. It is intended that initial work will continue to focus upon the Vision, Spatial Strategy and Place based proposals together with a limited number of strategic policies and part two, prepared once the uncertainty at national level is resolved, will include general development management style policies.

Sustainability Appraisal and Habitats Regulations Assessment

33. As set out in paragraph 5 above, the Local Plan will also be subject to:
- a. A Sustainability Assessment (SA), to appraise the social, environmental and economic effects of a plan helping ensure that decisions are made that contribute to achieving sustainable development; and
 - b. A Habitats Regulations Assessment (HRA), to test if a plan or project proposal could significantly harm the designated features of a European site.
34. The SA will evaluate the social, economic, and environmental impacts of strategies and policies in a Local Plan to assess to what extent they align with sustainable development objectives. The SA is integral to the plan making process. It performs a key role in providing a sound evidence base for the plan and forms an integrated part of the plan preparation process. The SA will inform the decision making process to facilitate the evaluation of alternatives. It should also help demonstrate that the plan is the most appropriate given the reasonable alternatives.
35. The application of the Habitats Regulations invokes the precautionary principle. Plans can only be permitted having ascertained that there will be no adverse effects on the integrity of European sites or European offshore marine sites (unless there are 'imperative reasons of overriding public interest'). The HRA process continues to present a significant risk to the plan making process. Phosphate levels in the River Lugg part of the River Wye SAC remain high and is currently failing to meet its conservation targets. In addition, parts of the River Wye catchment itself remain at risk of failure. Significant work continues to be progressed by Herefordshire Council to address this issue, including work upon:
- a. Integrated Wetlands;
 - b. Phosphate calculator and credits scheme; and
 - c. Agricultural Development SPD

However, the issue does have the potential to limit the ability of the plan to demonstrate housing targets based on the Government's standard method can be achieved over the plan period and in the shorter term may impact adversely on the Council's ability to demonstrate a five year supply of available housing land.

36. The intention is to produce a sound and robust Local Plan in a timely fashion taking account of all the regulatory issues highlighted above. It is anticipated that an additional target consultation will take place in the autumn of 2022 on the rural strategy. The draft part 1 Local Plan is expected to be prepared for February 2023 with the intention of a public consultation under Regulation 18 in June/July 2023.

Community impact

37. The principal aim of the Herefordshire Local Plan update will be to set out the spatial vision and objectives for the county and to establish a planning policy framework necessary to deliver the spatial vision. The plan will aim to ensure that there are sufficient homes provided for all

members of the community, provide employment opportunities, sufficient retail provision and improved infrastructure while, at the same time, providing protection for the wider environment and helping to tackle climate change. This is as relevant to the whole population of Herefordshire, and is as pertinent to those residing in the rural parishes, as it is to those in Hereford and the market towns.

38. The County Plan 2020-2024 provides a commitment to updating the Core Strategy (Local Plan) in order to make sure sustainable development is delivered which meets the needs of local people while respecting the County's heritage and our natural environment.
39. The preparation of an updated plan will include engagement and consultation with the Community at key stages in the preparation of the document in accordance with the Local Development Plan Regulations (2012) and the Council's adopted Statement of Community Involvement. This will enable the ambitions of local communities, as articulated in Neighbourhood Development Plans to be taken into account.

Environmental Impact

40. How this decision / proposal seeks to deliver the council's [environmental policy commitments](#) and aligns to the following success measures in the County Plan:
 - **Increase flood resilience and reduce levels of phosphate pollution in the county's rivers**

National Planning Policy Guidance has recently been updated and strengthened. Any new Local Plan policies will need to comply with the advice, and in particular employ the required sequential approach. In accordance with guidance, a countywide Level 1 Strategic Flood Risk Assessment (SFRA) was undertaken in 2020, this is likely to require an update prior to the Local Plan being submitted for EIP. In addition, as development sites are allocated, some are likely to require more detailed Level 2 SFRA to help determine the suitability of the site and whether mitigation is required to enable development.

In respect of water quality and development, the main body of the report reflects that this is a key consideration which has the potential to limit the ability of the Council to meet its development requirements. Significant work has already been undertaken by the Council and this will continue into the future. There will be a need to develop robust policies to ensure new development is nutrient neutral.
 - **Reduce the council's carbon emissions**

Local Plan policies will apply to all developments, including those owned, managed or developed by Herefordshire Council. The strategy is seeking to locate development in sustainable locations and reduce the need to travel by focusing the majority of growth in Hereford and the market towns. The rural spatial strategy options are also suggesting reduced spread of identified villages in rural areas for the 215 identified within the current Core Strategy.

Policy options have been included to increase cycling and walking opportunities, seeking potential local distance greenway routes, green infrastructure and reviewing the potential for 15 minute neighbourhoods concept to be used when planning strategic sites.
 - **Work in partnership with others to reduce county carbon emissions**

The Local Plan policies will apply to all development proposals and transportation, planning policy and development management officers will be working with applicants to deliver those reductions within their schemes.

- **Improve the air quality within Herefordshire**

Environmental protection includes policies on pollution and this includes air pollution. Where there are current air quality issues identified such as at Bargates in Leominster, specific option proposals are seeking to address air quality issues.

- **Improve residents' access to green space in Herefordshire**

A consultation is currently ongoing in connection to the green infrastructure and open space evidence base. This consultation, involving town and parish councils is seeking to provide an audit of current open space and potential improvements. Policies will be included within the Local Plan seeking to protect and enhance open spaces and continue to protect Local Green Space currently allocate with Neighbourhood Development Plans. Strategic planning of larger allocation sites will also seek to include new and connective green and open spaces as part of larger developments.

- **Improve energy efficiency of homes and build standards for new housing**

The Environmental Building Standards SPD is underway and this will provide important evidence for development of policy framework. National Model Design Code also include homes and building standards for new developments and there is a requirement nationally to integrate design coding into local policies.

- **Increase the number of short distance trips being done by sustainable modes of travel – walking, cycling, public transport**

Transport scope and updated modelling will consider the measures needed to enable modal shift and then be incorporated into the strategic proposals. The location of new development, in areas where there is likely to be a choice of transport modes other than the private car, will be important. As indicated above, the strategy is seeking to locate development in sustainable locations and reduce the need to travel by focusing the majority of growth in Hereford and the market towns. The rural spatial strategy options are also suggesting reduced spread of identified villages in rural areas for the 215 identified within the current Core Strategy.

Policy options have been included to increase cycling and walking opportunities, seeking potential local distance greenway routes, green infrastructure and reviewing the potential for 15 minute neighbourhoods concept to be used when planning strategic sites.

Equality duty

41. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
42. The process of producing the new local plan will need to ensure that there will not be any negative or disproportionate impact to those who share a relevant protected characteristic and demonstrate that it will support the council in discharging its equality duty in particular by advancing equality of opportunity between persons who share a protected characteristic. The plan making process will be accompanied by an equality impact assessment.
43. The public sector equality duty (specific duty) requires us to consider how we can positively contribute to the advancement of equality and good relations, and demonstrate that we are paying 'due regard' in our decision making in the design of policies and in the delivery of services. Our providers will be made aware of their contractual requirements in regards to equality legislation.
44. The consultations conducted as part of plan preparation will be undertaken in a way that is accessible to all and a number of methods will be used to enable as diverse a group as possible to have the opportunity to engage fully with the process, including considering targeting of specific groups where appropriate.

Resource implications

45. The Local Plan process will require significant funding over the plan making period. The key areas which will require funding include:
- The preparation of the evidence base to support the preparation of the plan as listed
 - Consultation and engagement.
 - Examination in Public.
46. Funding to support this decision is included in the medium term financial strategy. The recommendations of this report are not anticipated to have further financial implications.

Legal implications

47. [Section 19\(1B\) - \(1E\) of the Planning and Compulsory Purchase Act 2004](#) provides that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole).
48. The development plan is regarded as being at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise.
49. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
50. In light of the aforementioned paragraphs, there is a need for preparation of the Herefordshire Local Plan, which will ensure that the Council meets these requirements without which the development plan documents would be regarded as out-of-date.

Risk management

Risk / opportunity

Preparing a Local Plan will ensure that the Council's policies are up-to-date and reflect the ambitions of the County Plan and can enable a set of comprehensive policies for the protection of the environment, sustainability and addressing climate change. However, during the plan making process there will be a period where there is reliance upon out-of-date policies, in combination with national policy advice in some areas.

It is likely that new legislation/regulation will emerge from Government as the plan making process progresses. This may introduce new requirements, make work already undertaken redundant or require emerging policies and proposals to be revisited or amended. Such changes to national level policy and procedures have the potential to impact upon the Local Plan timetable and required resources.

Ensuring engagement and consultation with all communities in Herefordshire and other stakeholders and interested parties will ensure a better understanding of the plan making process and the need for future new development. However, proposals for land-use change are often controversial and can raise significant objections from local residents and can delay the plan making process. Well-reasoned objections have the potential to lead to changes in the plan and can even lead to the plan being found unsound.

Mitigation

Resources have been identified to enable preparation of the plan and improve the robustness of the Council's approach. However, it should be recognised that only limited weight can be afforded to emerging policies at least until the later stages of plan preparation.

The preparation of a project plan, supported by a project board and project manager, enables risks to be identified at an early stage and mitigation put in place thereby improving the chances of delivering a sound Local Plan.

Ensuring an appropriate engagement strategy is followed for each stage of consultation can reduce misunderstanding of the plan making process and development requirements. However, the controversial nature of the process also needs to be recognised and resources made available for suitable specialist and legal advice at key stages of the process and, in particular, at Examination in Public

Consultees

51. The process of preparing the updated Local Plan involves a significant level of engagement and consultation with the public, key organisations and other stakeholders, including town and parish council's. The plan will be independently examined to determine its compliance with legal and procedural requirements, such as engagement and consultation as well as soundness. The approach to consultation will as a minimum, be in accordance with the Council's adopted Statement of Community Involvement. Paragraphs 10-29 above set out details of the consultations undertaken during 2022.

Appendices

None

Background papers

None identified.

Report Reviewers Used for appraising this report:

Please note this section must be completed before the report can be published		
Governance	Steve Tucker	Date 08/09/2022
Finance	Louise Devlin	Date 07/09/2022
Legal	Dorcas Ephraim	Date 07/09/2022
Communications	Luenne Featherstone	Date 05/09/2022
Equality Duty	Carol Trachonitis	Date 06/09/2022
Procurement	Mark Cage	Date 08/09/2022
Risk	Kevin Lloyd	Date 08/09/2022
Approved by	Ross Cook	Date 12/09/2022