



COUNCIL – 23RD OCTOBER 2019

SUBJECT: CAERPHILLY COUNTY BOROUGH LOCAL DEVELOPMENT PLAN UP TO 2021 – ANNUAL MONITORING REPORT 2019 (INCLUDING THE 5TH ANNUAL COMMUNITY INFRASTRUCTURE LEVY REPORT)

REPORT BY: INTERIM CORPORATE DIRECTOR - COMMUNITIES

1. PURPOSE OF REPORT

- 1.1 For members to consider the findings and recommendations of the Caerphilly County Borough Local Development Plan 2019 Annual Monitoring Report and to recommend that the 2019 Annual Monitoring Report be approved by Council.
- 1.2 To recommend that the 2019 Annual Monitoring Report be submitted to the Welsh Government by 31 October 2019, in order to satisfy the Council's statutory requirements.
- 1.3 To seek Council agreement to commence the preparation of a full revision of the Adopted Local Development Plan.
- 1.4 If Council agrees to the commencement of the preparation of a Replacement Local Development Plan, to seek Council approval for the necessary budgetary measures to provide the finance necessary to meet the costs of delivering the Regional Strategic Development Plan and the Replacement LDP.
- 1.5 If Council agrees to the commencement of the preparation of a Replacement Local Development Plan, to seek Council agreement to the creation of a two-year fixed term post to complete the delivery of the Council's Regeneration Strategy Framework via development and publication of area masterplans.

Glossary of Terms Used in This Report

LDP	Caerphilly County Borough Local Development Plan 2010 up to 2021(Adopted 2010)
CCBC	Caerphilly County Borough Council
AMR	Annual Monitoring Report
WG	Welsh Government
CCR	Cardiff Capital Region
Regional Cabinet	Cardiff Capital Region Cabinet

CIL.....	Community Infrastructure Levy
Local Councils	Town Councils and/or Community Councils
NDF.....	National Development Framework
PPW	Planning Policy Wales
TAN 1	Technical Advice Note 1: Joint Housing Land Availability Study
SDP.....	Strategic Development Plan
JHLAS	Joint Housing Land Availability Studies
LDP Lite.....	Lite touch form of the LDP review where an SDP Is in place

2. SUMMARY

- 2.1 It is a statutory requirement that the Council submits an Annual Monitoring Report (AMR) to the Welsh Government (WG) that monitors whether or not the Caerphilly County Borough Local Development Plan up to 2021 (LDP) is being implemented successfully. The overall purpose of the AMR is to identify whether the LDP Strategy, or any of the Strategy Policies, are not being implemented and if they are not, identify steps to rectify this.
- 2.2 This is the eighth Annual Monitoring Report to be prepared for the Caerphilly County Borough Local Development Plan up to 2021 and it monitors the period from 1st April 2018 to 31st March 2019. The Council is required to submit the 2019 Annual Monitoring Report to WG by the 31st October 2019.
- 2.3 An overview of the data for the 2019 monitoring period provides an interesting insight into the implementation of the LDP over the last year. Of particular note for 2019 is the following:
- The annual house building rate in this AMR has fallen this year from 284 to 190 units (based on 2018 Joint Housing Land Availability Study figures).
 - The housing land supply figure has increased from 2.1 years to 2.3 years using the residual method, following the approval of several major housing applications.
 - The average house price for the county borough increased by 2% from £129,928 to £132,469.
 - The annual unemployment rate decreased from 6.2% to 5.2%.
 - The number of residents in employment increased from 80,700 to 81,900.
 - A further 12 hectares of employment land was granted planning permission.
 - Of the principal town centres, only Caerphilly and Risca-Pontymister have a vacancy rate of lower than 10% and both towns saw their vacancy rates decrease this year to the lowest levels since the LDP was adopted. Blackwood, Bargoed and Ystrad Mynach have all seen an increase in vacancy rates.
 - In the three principal towns with footfall counters (Caerphilly, Blackwood, Bargoed) there has been an increase in footfall in both Caerphilly and Blackwood. However, the previous AMR year data included a period of six weeks where the footfall counters were out of action so the data is not directly

comparable. The figures in Bargoed have decreased, but this is to be expected as there is now only one footfall camera within the town rather than two.

- There was a further increase in visitor numbers to countryside recreation facilities to 1.5 million visitors per annum, and customer satisfaction has increased from 75% to 85%.

- 2.4 The 2019 AMR also includes the annual monitoring statement for the Council's implementation of its Community Infrastructure Levy (CIL). This is the fifth year the AMR has included this. The 2019 CIL Monitoring identified that £756,590 had been collected in revenue, whilst £87,513 has been passed to Local Councils (Town and Community Councils) and £37,830 has been used to cover the costs of preparing and implementing CIL. A total of just over £1,086,000 remained in the CIL pot to assist in funding appropriate infrastructure.
- 2.5 The 2013 AMR and subsequent AMRs have clearly identified the need for the LDP to be reviewed. Work commenced on a Review of the LDP in 2013, but in July 2016 the Council resolved to withdraw the Replacement LDP and seek support for the early preparation of a Strategic Development Plan (SDP) for the Cardiff Capital Region.
- 2.6 Following extensive discussions, in June 2019 the Cardiff Capital Region Joint Cabinet endorsed the principle of preparing the SDP and agreed a report template to be considered by each of the 10 Councils within the Cardiff Capital Region, which sets out the geographical area to be covered by the SDP; the scope and content; governance arrangements and costs. The SDP report is due to be considered by each of the 10 LAs in the autumn of 2019. Subject to the agreement by the 10 LAs, it is anticipated that work will progress on the SDP. However, the proposed timescales for the preparation of the SDP will mean that the SDP is unlikely to be adopted until 2025 at the earliest.
- 2.7 It was originally envisaged that a light touch LDP (or LDP Lite) would be prepared in tandem with the preparation of the SDP as this would offer the best solution in respect of delivering regional objectives and the utilisation of resources. However, it would not be possible to progress significantly with an LDP Lite until there is certainty on the strategy and content of the SDP. This would mean that an LDP Lite is unlikely to be adopted until 2026 at the earliest. In Caerphilly this would result in a period of 5 years with no local development plan coverage, as the adopted LDP will expire at the end of 2021.
- 2.8 The pressure for the Council to reconvene work on a Replacement LDP remains strong as:
- There is a statutory requirement to move to review after four years;
 - There has been a substantial passage of time since the 2013 AMR identified the need to prepare a new plan;
 - Post 2021 the LDP will 'drop dead' and every effort should be made to ensure that the time without local development plan coverage is minimised;
 - There is an urgent need to increase the housing land supply to deliver market and affordable housing;
 - There is an urgent need to identify additional employment land to encourage economic growth in the county borough; and

- Further unplanned development is likely to be allowed on appeal in the short term.

2.9 The 2019 Annual Monitoring Report therefore concludes and recommends that:

- **The 8th Annual Monitoring Plan has indicated that substantial progress has been made in implementing the Caerphilly County Borough Local Development Plan up to 2021.**
- **In recognition of the need to identify more land for employment and housing to support local need and regional aspirations the 8th Annual Monitoring Report recommends that a review of the Adopted LDP be commenced.**
- **In the period up to the adoption of a new Replacement LDP, the Council will continue to address the shortfall in the 5-year housing land supply through proactive action, including:**
 - **Considering proposals for new residential development on their relative planning merits on a site-by-site basis and have due regard for the need to increase the housing land supply in line with national planning policy and guidance;**
 - **Lobbying Welsh Government to establish funding mechanisms to incentivise sites in low viability areas and promote remediation of suitable brownfield sites for development;**
 - **Utilising the innovative funding model to bring forward Council owned sites with viability issues;**
 - **The identification of schemes through the Regeneration Project Board where funding opportunities could be exploited to deliver regeneration projects, including for housing and employment.**

2.10 With the AMR recommending that a review of the Adopted LDP be undertaken, consideration needs to be given to the form of revision that will be undertaken. There are two options for the form of review:

- **Full Review:** A full review of the LDP utilising the whole LDP preparation process;
- **LDP Lite:** The 2015 Planning Act made provision for local authorities to prepare a light touch review of the plan where a Strategic Development Plan is in place. The SDP would provide the strategic framework for the LDP and, as such, the LDP Lite would use a shorter preparation process as the strategy element will have already been identified.

2.11 Whilst the preparation process for an LDP Lite is shorter and would deliver an adopted plan in a quicker timescale, an LDP Lite cannot be prepared and adopted until the SDP has itself been adopted. As a result the LDP Lite process would mean that the county borough would be left without local development plan coverage for at least 5 years. A full review of the LDP, whilst taking longer to prepare, could be commenced immediately and, as a result, could mean that the county borough would be without local development plan coverage for only two and half years. Therefore it is recommended that a Full Review of the LDP be commenced.

2.12 The Review of the LDP will be a costly and time consuming process. It will require the Strategic Development Plans Team's full focus in order to deliver the Review within the required 3 and a half year timescale. The Review of the LDP will also incur

significant costs arising from the need to establish an evidence base support the plan, engagement and consultation and the Examination process for the plan. It is estimated that the direct costs of preparing the Review of the LDP is in the region of £615,000.

- 2.13 The Review of the LDP will require input from a range of other service areas in order to evidence and support the plan. These services areas will incur significant costs, over and above their normal costs, as a result of their involvement in the process. It has been estimated that the indirect costs to the other service areas is in the order of £220,000.
- 2.14 Overall the costs of preparing a review of the LDP, both indirect and direct costs, are estimated to be within the region of £835,000. However, the majority of the costs will be incurred during two specific periods, namely during the gathering of the evidence base at the beginning of the process and the examination process in what is likely to be the third year of preparation. As a result the Council will need to ensure that appropriate finance is made available through the relevant budgeting processes to ensure the review of the LDP is properly resourced.
- 2.15 Over the past 3 years the Strategic and Development Plans team has had a critical role in the preparation of policy documents focussing on the delivery of allocations within the LDP and promoting regeneration opportunities within the current land use planning framework. This work has included the preparation of 'A Foundation for Success: The Regeneration Strategy for the County Borough' and Masterplans for both Caerphilly Basin and Ystrad Mynach. The need to refocus the Team onto the Review of the LDP will mean that the Team will not be able to prepare the remaining documents in the suite of Masterplans to support 'A Foundation for Success'.
- 2.16 It is essential that this work is completed in order for the Council to maximise the benefits from funding opportunities and to realise its regeneration objectives. Consequently it is proposed that a new fixed term post be created with responsibility for completing the suite of Masterplans. It is anticipated that this work would take approximately 2 years to complete. It is therefore recommended that a 2-year, fixed term planning officer post Grade 9 post be created, at the cost of £44,615 per year (including on-costs, excluding pay inflation) to complete this work.

3. RECOMMENDATIONS

- 3.1 Council considers and notes the findings of the 2019 Annual Monitoring Report and approves the 2019 Annual Monitoring Report.
- 3.2 The 2019 Annual Monitoring Report (Including the 5th Annual Community Infrastructure Levy Report) be submitted to the Welsh Government before the deadline of 31 October 2019.
- 3.3 Council agrees to the commencement of a full Review of the Adopted Local Development Plan, to replace the Adopted Caerphilly County Borough Local Development Plan.
- 3.4 Council approves the financial measures and makes budgetary provision available necessary to fund the preparation of both the regional Strategic Development Plan (subject of a separate Council report on 08/10/19) and the Replacement Local Development Plan.

- 3.5 Council approves the creation of a 2-year fixed term post funded from the Communities Directorate Service Reserves to complete the delivery of the suite of Masterplans to supplement the council's Regeneration Strategy 'A Foundation for Success'.

4. REASONS FOR THE RECOMMENDATIONS

- 4.1 To comply with the requirements of the Planning and Compulsory Purchase Act 2004, the LDP Wales Regulations 2005 and the SEA Directive.
- 4.2 To comply with the requirements of the Planning and Compulsory Purchase Act 2004, the LDP Wales Regulations 2005 and the SEA Directive.
- 4.3 To comply with the recommendations set out in the 2019 Annual Monitoring Report and the requirements of the Planning and Compulsory Purchase Act for development plan coverage for the county borough
- 4.4 To ensure that the council meets its financial contribution requirements in delivering the Strategic Development Plan and to provide the necessary budget to cover the cost of the preparation and adoption of a Replacement Local Development Plan
- 4.5 To ensure that Regeneration Policy Framework is completed to provide a comprehensive suite of Masterplans to supplement the regeneration strategy 'A Foundation for Success' across the whole of the county borough.

5. THE REPORT

Background

- 5.1 The Council formally adopted the Caerphilly County Borough Local Development Plan (LDP) on the 23 November 2010. Following the adoption of its LDP, the Council has a statutory obligation under section 61 of the Planning and Compulsory Purchase Act 2004 to keep all matters under review that are expected to affect the development of its area. Further, section 76 of the Act requires the Council to produce information on these matters in the form of an Annual Monitoring Report for submission to Welsh Government (WG). The 2019 AMR monitors the period from 1st April 2018 to 31st March 2019 and it is required to be submitted to WG by the 31st October 2019.
- 5.2 The 2019 Report once again considers whether the Development Strategy that underpins the Adopted LDP remains valid; and whether or not the Strategy Policies contained in the Adopted LDP are being effective in delivering the Development Strategy and meeting the objectives of the plan.

Annual Monitoring Requirements

- 5.3 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) and the LDP Manual Edition 2 specify that the 2019 AMR is required to include the following:
- An Executive Summary.
 - A review of changes to national and regional policy and guidance and their implications for the LDP.

- The Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) Monitoring based on the SEA/SA Monitoring Framework (LDP Appendix 18).
- The LDP Monitoring based on the LDP Monitoring Framework (LDP Appendix 19).
- The required Statutory Indicators.
- The recommendations on the course of action in respect of policies and the LDP as a whole.

5.4 Copies of the full 2019 AMR entitled “Caerphilly County Borough LDP 8th Annual Monitoring Report 2019 (including the 5th Annual CIL Report)” together with the background statistical tables have been placed in the resource library and have been put on the members’ portal for members’ information.

Report of Findings

Changes in National, Regional and Local Policy Context

5.5 External Changes need to be considered as part of the AMR and consideration needs to be given to how external factors are impacting upon how the LDP policies are being implemented. These include changes to national policy or legislation; external conditions; and local considerations. There are a number of key changes that are considered in the 2019 AMR.

National Planning Context

National Development Framework

5.6 Welsh Government continue to progress with work on the National Development Framework (NDF), the 20 year land use framework for Wales. A consultation on the Issues, Options and Preferred Option for the National Development Framework was undertaken during the monitoring period and representations were made on behalf of the Council to this consultation.

5.7 The draft NDF was published for consultation in the summer of 2019. As this consultation will commence outside of the monitoring period, the content and potential implications of this will be considered in the 2020 AMR.

Planning Policy Wales Edition 10 (PPW10)

5.8 PPW10 was published in December 2018. PPW10 sets out the national land-use planning policies of the Welsh Government and provides the policy basis to inform policies and land-use allocations in Local Development Plans (LDPs). It is also a material consideration for decision makers in determining planning applications.

5.9 PPW10 has been restructured, with a move away from topic-specific chapters and into policy themes derived from the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. It identifies ‘Placemaking’ as a central concept for delivering sustainable places. Whilst PPW10 retains a significant element of the policy content included in Edition 9, there are a number of new policy statements across a range of policy areas which need to be considered in the determination of planning applications and in the preparation of future development plans.

Draft Development Plans Manual 3

- 5.10 Welsh Government have also recently published for consultation a draft Development Plans Manual. Whilst the consultation document was published outside of the monitoring period, it is the key guidance document on the preparation of Local Development Plans in Wales and therefore its contents are critical to the AMR, and will inform future development plans.

WGC 005/2018: Planning for Gypsy, Traveller and Showpeople Sites

- 5.11 A Circular on Gypsy, Traveller and Showpeople Sites was published during the monitoring period. The Circular provides guidance on the allocation of sufficient sites within development plans for residential use, transit sites and temporary stopping places, as well as the approach to criteria based policies. The content of the Circular will be given due consideration in the future preparation of development plans.

Technical Advice Note (TAN 1): Joint Housing Land Availability Studies (2015)

- 5.12 As reported in last year's AMR, a significant change to Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies regarding the weight to be given to the 5 year land supply in decision making has also been a key consideration. Following a consultation with key stakeholders, WG have dis-applied Paragraph 6.2 of the TAN. This paragraph indicates that where local planning authorities did not have a five year housing land supply, the need to increase the supply of housing should be given "considerable weight" when dealing with planning applications, provided they would otherwise comply with the development plan and national planning policies. Whilst "considerable weight" no longer needs to be given to increasing the housing supply, the housing land supply is still a material consideration and the weight to be attributed to it is a matter for the decision maker (i.e. the Local Planning Authority).

Regional Planning Context

Strategic Development Plan (SDP)

- 5.13 In January 2018 the Cardiff Capital Region (CCR) Cabinet endorsed the recommendation that work should commence on the SDP for the Region. Since then, work has been ongoing to establish the key areas of agreement to enable the project to proceed. The Cardiff Capital Region Cabinet has held workshops attended by the Leaders, Chief Executives, Lead Cabinet Members for Planning and Chief Planning Officers of the 10 Cardiff Capital Region Authorities to discuss the key issues of:
- The area to be covered by the SDP (Strategic Planning Area [SPA]);
 - The scope and content of the SDP and the period it would cover;
 - Governance arrangements associated with the Strategic Planning Panel (SPP) including apportionment of membership and voting for the constituent authorities; and
 - The costs associated with the process, including the mechanism for delivering the SDP and how the costs should be apportioned between each of the constituent authorities.
- 5.14 Following extensive discussions, in June 2019 the Joint Cabinet endorsed the principle of preparing the SDP and agreed that a report be presented to each of the constituent Councils to seek their approval to commence the SDP for the region. The report will be presented to each local authority in the autumn of 2019. The report to Caerphilly County Borough Council is being presented to Council alongside this AMR report.

Strategic Environmental Assessment/Sustainability Appraisal Monitoring

- 5.15 The Strategic Environmental Assessment Directive requires local authorities to undertake Strategic Environmental Assessments (SEA) as part of the preparation of the LDP. In addition to this the LDP Regulations requires a Sustainability Appraisal (SA) to be undertaken. In preparing the LDP the Council undertook a joint SEA and SA and produced and published its SEA/SA Report in conjunction with the LDP.
- 5.16 The SEA Directive also requires that the Council monitors the state of the environment through monitoring the sustainability objectives set out in the SEA/SA Report. This forms an integral part of the AMR and is contained in Section 4.
- 5.17 This year's SEA monitoring shows a marked improvement to the position of the last two AMR years, where the results were skewed towards a negative overall effect. Whilst some indicators did record negative effects this year, many were different indicators to the ones that were negative in previous years and overall there continues to be no indicators that have consistently been negative since the adoption of the plan. The picture across all objectives is one of significant variation due to the site specific nature of certain indicators, external circumstances and the fact that many indicators are considered relative to national averages, rather than on a trend basis.

LDP Policy Monitoring

- 5.18 The LDP Monitoring considers each of the 22 Strategy Policies against the LDP Monitoring Framework to identify whether the policies are being effective and to identify any policies that are not being implemented.
- 5.19 An overview of the LDP monitoring data for the 2019 AMR provides an interesting insight into the implementation of the LDP over the monitoring period. Of particular note for 2019 is the following:
- The annual house building rate in this AMR has fallen this year from 284 to 190 units (based on 2018 Joint Housing Land Availability Study figures).
 - The housing land supply figure has increased from 2.1 years to 2.3 years using the residual method, following the approval of several major housing applications. (It should be noted that the AMR uses the data from the previous year's JHLAS, due to the fact that the JHLAS is generally agreed after the preparation of the data for the AMR Report. Therefore, the 2019 AMR uses the 2018 JHLAS information that actually covers the period 1 April 2017 to 31 March 2018. The 2019 JHLAS has recently been agreed and the housing land supply has decreased to 2.0 years. This is still well below the 5-year requirement. This figure will be reflected in the 2019 AMR)
 - The average house price for the county borough increased by 2% from £129,928 to £132,469.
 - The annual unemployment rate decreased from 6.2% to 5.2%.
 - The number of residents in employment increased from 80,700 to 81,900.
 - A further 12 hectares of employment land was granted planning permission.
 - Of the principal town centres, only Caerphilly and Risca-Pontymister have a vacancy rate of lower than 10% and both towns saw their vacancy rates decrease this year to the lowest levels since the LDP was adopted.

Blackwood, Bargoed and Ystrad Mynach have all seen an increase in vacancy rates.

- In the three principal towns with footfall counters (Caerphilly, Blackwood, Bargoed) there has been an increase in footfall in both Caerphilly and Blackwood. However, the previous AMR year data included a period of six weeks where the footfall counters were out of action so the data is not directly comparable. The figures in Bargoed have decreased, but this is to be expected as there is now only one footfall camera within the town rather than two.
- There was a further increase in visitor numbers to countryside recreation facilities to 1.5 million visitors per annum, and customer satisfaction has increased from 75% to 85%.

5.20 Where the land supply is less than 5 years, TAN 1 requires local authorities to take steps to increase the supply of housing land, which may include reviewing the development plan, releasing land in its ownership, expediting planning applications or securing the provision of infrastructure to release constrained sites.

5.21 It should be noted that, following the preparation of the 2013 AMR Report, the Council commenced a review of the Adopted LDP. The Replacement LDP progressed through to its Deposit Stage before the Council resolved to withdraw it at the Council meeting on 19 July 2016. Following discussions with Welsh Government Ministers and senior officials, the Council formally withdrew the Replacement LDP at the Council meeting on 11 October 2016, as part of the resolution to agree the 2016 Annual Monitoring Report.

5.22 Since that decision there have been a number of applications for residential development, on sites that are not in accordance with the Adopted LDP, that have been allowed on appeal. The lack of a 5-year land supply was a key factor in the determination of the appeals. It is evident from these decisions that the Planning Inspectorate and Welsh Government both consider the 5-year land supply issue to be a significant material consideration in determining proposals for residential development.

5.23 The dis-application of TAN 1 from 18th July 2018 means that local authorities will no longer need to give “*considerable weight*” to the lack of a 5 year housing land supply when determining planning applications. It should be noted that there is still a need to consider the lack of the 5 year housing land supply, but the weight attributed to it will be for decision makers to determine. Future applications will therefore be considered on their merits. However, there still remains a significant shortfall in housing. Whilst the Council is seeking to address this matter, in part through the release of relevant public sector land in the short term, the issue of the lack of a 5-year housing land supply will continue to be a significant issue.

5.24 Objective 17 which addresses Caerphilly’s role as a commercial and employment centre and Objective 18, on providing and protecting a diverse portfolio of employment land for a variety of employment uses, have also been identified as not delivering, on the grounds of the small amount of land granted planning permission for employment use. Notably no allocated employment sites were being developed for employment use during the monitoring period. The LDP has been relatively successful in respect of the development of employment sites and it is therefore not surprising that only a few sites remain. However, it is important that opportunities are explored through the development plan process to ensure that there will be a diverse

portfolio of sites available in the future to support Caerphilly's strategic position in respect of employment and commercial development

- 5.25 Overall the LDP Monitoring finds the plan is being implemented within acceptable parameters, except for the issues of housing delivery and employment growth.

Statutory (Mandatory) Indicators

- 5.26 LDP Manual: Edition 2 has revised the number of statutory or mandatory indicators from the original 10, to just 4. There are also 2 statutory indicators required through TAN1: Joint Housing Land Availability Studies, which remain unchanged. Appendix 1 to the AMR report sets out the plans performance against those monitoring indicators that are required by the Regulations.

Community Infrastructure Levy – 5th Annual Report

- 5.27 The Community Infrastructure Levy (CIL) was introduced in Caerphilly County Borough on 1 July 2014. It is a mandatory charge that is levied against all new qualifying development.
- 5.28 In order to ensure that the implementation of the Community Infrastructure Levy is open and transparent, the Council must prepare an annual report on CIL. The 2019 AMR also comprises the 5th Annual Community Infrastructure Levy Monitoring Report (CIL Report).
- 5.29 The CIL Report covers the previous financial year, in this instance 1st April 2018 to 31st March 2019, and must be published on the Council's website by 31 December each year.
- 5.30 During the monitoring period a total of £756,590.43 in CIL receipts were received by the Council. A total of £87,513.21 was paid to 7 Local Councils in accordance with the CIL Regulations. In addition to this a further £25,346.12 is being retained for use within those areas of the county borough that are not covered by Local Councils.
- 5.31 In accordance with the CIL Regulations provisions the Council has taken £37,829.52 of the CIL receipts in admin fees to assist in covering the cost of implementing and operating the CIL. The admin fees amount to 5% of the total CIL receipts for the year.
- 5.32 It can be confirmed that no infrastructure payments have been received in lieu of CIL and no CIL receipts have been passed to third parties to provide infrastructure. Given the above, the remaining amount of CIL receipts available for expenditure on infrastructure items is £1,086,038.10.
- 5.33 Bids for infrastructure funding from CIL will be considered and recommendations on what bids should receive funding will be reported to Council as part of the 2019/2020 budget considerations. The 2019 Report will include details of all CIL spend for that year, as well as further income and expenditures.
- 5.34 The Regulations also require all Local Councils in receipt of CIL revenue to prepare annual reports on their CIL income and expenditure, for inclusion in the annual CIL report. The annual local Council CIL reports are set out in Appendix 5 of the AMR Report.

AMR Conclusions and Recommendations

- 5.35 The 2019 AMR process has identified that 2 housing policies, namely: SP14 Total Housing Requirements; and SP15 Affordable Housing Target, are not being implemented as anticipated and require action to be taken. It also identifies one objective, namely Objective 9, which seeks to: *“Ensure an adequate and appropriate range of housing sites are available across the County Borough in the most suitable locations to meet the housing requirements of all sections of the population”* which is not being met.
- 5.36 Since the economic crash in 2008 there has been a sustained reduction in housing delivery by the housebuilding industry, a factor that is outside the influence of the LDP. During this time, the Adopted LDP has been successful in delivering housing, with just over half of the housing requirement developed to date. Given the poor economic conditions during much of the plan period, the scale of delivery is considered acceptable. However, with only two years of the plan period remaining, there is insufficient time for the build rate to increase to address the shortfall, even with improved economic conditions. The 2019 Joint Housing Land Availability Study (JHLAS) identifies that approximately 900 dwellings are expected to be delivered over the next two years. This represents a significant shortfall of 3,800 units of the total housing requirement for the plan period.
- 5.37 Furthermore, there are concerns that two of the employment objectives of the plan are not being met – Objective 17, which seeks to *“Capitalise on Caerphilly’s strategic position further developing its role as a commercial and employment centre in the heart of the Valleys City Region with strong links to the Heads of the Valleys area and as the smart alternative for locating development to Cardiff and Newport”* and Objective 18 *“Provide and protect a diverse portfolio of employment land for a variety of employment uses, focusing in particular on higher value employment opportunities and sites to meet local need, including waste management facilities.”*
- 5.38 The AMR highlights that 37.2 Ha of land has been developed during the plan period to date. The diversity and range of allocated sites that remain, particularly in the Caerphilly Basin, is limited and it would be timely to reconsider whether these continue to meet the needs of the business community. There has been a decrease in permissions for B1/B2/B8 employment this monitoring period, together with the low rates of delivery over the past three years, raising concerns that there is no longer the range and diversity of sites to meet future needs. This is critical in respect of local and regional aspirations, where City Deal strives to deliver 25,000 jobs in the region; the allocation of land is needed to facilitate this.
- 5.39 The Adopted LDP is due to expire on 31st December 2021. Section 12 of the Planning (Wales) Act states that on expiry of the plan period, the LDP cannot be used for the purposes of making planning decisions. There has been an ongoing dialogue between Senior Members and officers and the Welsh Ministers and their officials regarding the possibility of deleting this subsection of the legislation to allow LDPs to be used beyond this date. However, the Minister for Housing and Local Government wrote to the Leader of the council on 12th June 2019 to advise that this would not be considered. The consequence of this is that, post 2021, planning applications will need to be determined against national policy rather than the locally specific policies contained within the LDP. This will restrict the ability to utilise a range of local policies such as the settlement boundary, town centre boundaries, employment site use restrictions or certain planning obligations (e.g. affordable housing targets, open space requirements). The commencement of a review of the LDP following the recommendations of this AMR will minimise the amount of time without local development plan coverage.

- 5.40 The Council has been working closely with the 10 LAs within the Cardiff Capital Region to progress the SDP to a point where the Governance, Strategic Planning Area Boundary and Scope, Content and Plan Period will hopefully be agreed by each authority in the autumn of 2019. The timescales to reach this point have, however, been longer than anticipated and critically the timetable for adoption of the SDP is now anticipated to be 2024/25, which is some three years after the expiry of the Adopted LDP, which expires on 31 December 2021. It is therefore necessary to consider whether this position is still in the best interest of the County Borough.
- 5.41 It was originally envisaged that a light touch LDP (LDPL) would be prepared in tandem with the preparation of the SDP as this would offer the best solution in respect of delivering regional objectives and the utilisation of resources. However, it would not be appropriate to make significant progress on an LDPL until such time as there is certainty on the soundness of the SDP strategy. The soundness of the SDP strategy will not be known until such time as the outcomes of the SDP Examination are known, which is estimated to be in 2024/25. An LDPL could not be adopted until 2026 as a minimum, which would leave Caerphilly County Borough without an adopted local development plan for a period of 5 years; two years longer than if a full LDP Review was instigated in 2020. This would have significant implications for investment decisions in the County Borough, as well as increasing the time that the County Borough is vulnerable to speculative planning applications for all forms of development.
- 5.42 In light of the above, the pressure for the Council to commence work on a new Replacement LDP is compelling as:
- There is a statutory requirement to move to review after four years;
 - There has been a substantial passage of time since the 2013 AMR identified the need to prepare a new plan;
 - Post 2021 the LDP will 'drop dead' and every effort should be made to ensure that the time without local development plan coverage is minimised;
 - There is an urgent need to increase the housing land supply and to deliver market and affordable housing;
 - There is an urgent need to identify additional employment land to encourage economic growth in the county borough; and
 - Further unplanned development is likely to be allowed on appeal in the short term.
- 5.43 However, most of these issues, with the exception of the employment objectives, have been identified in previous AMRs back to 2016, but the commencement of a revision of the LDP has not been recommended due to the fact that the decision to withdraw the Replacement LDP in 2016 included four recommendations, which included:
- To work with all local planning authorities across the Cardiff City Capital Region to prepare a strategic development plan in line with the signed City Deal Agreement at the earliest possible time.
- 5.44 This recommendation placed an onus on the Council to pursue the early preparation of a SDP for the Cardiff Capital Region.
- 5.45 Following extensive discussions, in June 2019 the Cardiff Capital Region (CCR) Cabinet endorsed the principle of preparing the SDP and agreed a report template to

be reported to each of the 10 constituent local authorities seeking their agreement to commence work on the SDP. This report will be presented to all 10 Councils by the end of October 2019.

- 5.46 The fact that the CCR authorities are now in this position means that the July 2016 Council Resolution has now been met. As a result, this resolution can no longer be used as a reason not to commence work on the review of the Adopted LDP.
- 5.47 The 2019 Annual Monitoring Report therefore concludes:
- Since 2013 all AMRs have concluded that a revision of the Adopted LDP was required
 - The 2019 AMR concludes that a revision of the Adopted LDP is required on the basis of issues relating to housing and employment land
 - A report seeking the agreement of the 10 CCR local Authorities to commence the preparation of a SDP has satisfied the recommendation included in the withdrawal of the Replacement LDP
- 5.48 The 2019 Annual Monitoring Report therefore concludes and recommends that:
- R1 The 8th Annual Monitoring Plan has indicated that substantial progress has been made in implementing the Caerphilly County Borough Local Development Plan up to 2021.
- R2 In recognition of the need to identify more land for employment and housing to support local need and regional aspirations the 8th Annual Monitoring Report recommends that a review of the Adopted LDP be commenced.
- R3 In the period up to the adoption of the revised LDP, the Council will continue to address the shortfall in the five year housing land supply through proactive action, including:
- Considering proposals for new residential development on their relative planning merits on a site-by-site basis and have due regard for the need to increase the housing land supply in line with national planning policy and guidance;
 - Lobbying Welsh Government to establish funding mechanisms to incentivise sites in low viability areas and promote remediation of suitable brownfield sites for development;
 - Utilising the innovative funding model to bring forward Council owned sites with viability issues;
 - The identification of schemes through the Regeneration Project Board where funding opportunities could be exploited to deliver regeneration projects, including for housing and employment.

Form of LDP Revision

- 5.49 The Planning Wales Act 2019 sets out the provisions for the preparation of Strategic Development Plans. In addition to this the Act sets out the provisions for local authorities within the area covered by an SDP to undertake a short form of LDP review termed an LDP Lite. The LDP Lite would benefit from the overarching strategy and strategic policies set out in the SDP. As a result the LDP Lite would comprise allocations and local development control policies.
- 5.50 Given the reduced content and the fact that the LDP Lite would not require the Preferred Strategy stage, due to the SDP Strategy, the LDP Lite would be quicker to

prepare than a full review. However, an LDP Lite is directly related to the SDP and would therefore need to be prepared after the SDP. Welsh Government has advised that an LDP Lite should be prepared following the adoption of the SDP. It would be possible to commence the preparation of an LDP Lite when the SDP has reached a stage of relative certainty, i.e. submission for examination. Commencing preparation of an LDP Lite before the SDP is adopted runs the risk that the LDP Lite may be found not in conformity with the SDP if changes are made to the SDP as part of the examination process. This would require additional work to address the issue and would increase the preparation time for the LDP Lite.

- 5.51 Even if the LDP Lite is commenced at submission stage of the SDP, the current programme would see the SDP adopted in 2025 and this would mean that the earliest that the LDP Lite could be adopted would be mid to late 2026. With the Adopted LDP reaching its 'drop dead' point at the end of 2021, this would mean a period of at least 5 years without local development plan coverage.
- 5.52 By comparison a full review of the Adopted LDP would require the full process, including the Preferred Strategy stage. Due to the fact that the Adopted LDP has an evidence base, which would only require updating, Welsh Government expect LDP Revisions to take only three and half years to prepare and adopt. If the decision is taken to commence a full review it is anticipated that a revised LDP could be adopted in early 2024. This would mean that the period without local development plan coverage would be just over 3 years.
- 5.53 Care would need to be taken with the preparation of a full review of the LDP to ensure that it remains in conformity with the emerging SDP as it is progressed, albeit slightly behind the LDP. If the new Replacement LDP is not in general conformity with the adopted SDP, then a further review of the LDP would be required, albeit in the form of the LDP Lite.
- 5.54 The key issue in respect of the LDP is the period without local development plan coverage, i.e. the period after the drop dead date of the Adopted LDP, post 2021. An adopted LDP provides the policy framework for making development management decisions and also provide certainty to investors. Following the drop dead date development proposals can only be determined against national planning policy and guidance, with the potential for developments that would not normally be acceptable, being permitted.
- 5.55 More importantly, however, the lack of local development plan coverage is likely to have a significant adverse effect on investment decisions. The certainty that development plans provide are a key element in such decisions and the period without coverage could have a significant impact on investment into the county borough, at a time when the City Deal, Metro and Valleys Task Force programmes are targeting growth and investment in the county borough.
- 5.56 Given this it is essential that the period without local development plan coverage is minimised and therefore the Council should now resolve to commence a full review of the Adopted LDP with the aim of adopting a new LDP in early 2024.

Consequential Implications of Commencing a Revision of the LDP

- 5.57 The preparation of an LDP is a costly and work intensive task that continues over a period of years. Through Planning Policy Wales and the amended LDP Manual, Welsh Government has reduced the period expected for the preparation of a development plan to just 3½ years, which means a much greater work and cost focus

than has previously been the case. In making a decision to commence the revision of the Adopted LDP, Member will need to be advised of the implications in respect of the decision, particularly in respect of the costs of preparation and the impact on the workload of the Strategic Planning Team.

Direct Costs

- 5.58 There are significant cost implications in preparing a new LDP. The plans are underpinned by an exhaustive evidence base, which is based on a significant amount of information and assessments. The plan will be subject to extensive public engagement and consultation and ultimately the plan will be the subject of independent Examination by the Planning Inspectorate before being adopted. All of these elements have significant cost implications and the Council will need to set aside sufficient finance to cover these costs.
- 5.59 The cost of preparing the Adopted LDP, which was commenced in 2006 and was adopted in 2010, was in the region of £450,000, not including staff costs. In order to provide an estimate of the potential costs of preparing a Replacement LDP the costs incurred previously have been updated, as those costs are now over 10 years old. Since the adoption of the LDP in 2010, costs have increased and this will need to be reflected in the budget to prepare a Replacement LDP.
- 5.60 Since the adoption of the LDP in 2010 changes to legislation and guidance have significantly increased the level of information required to prepare a plan, as well as introducing significant new requirements and procedures, all of which increase the cost of preparing a new LDP.
- 5.61 It is estimated that the cost of undertaking a full review of the LDP will be in the order of £615,000, based on revised estimates of costs from 2010. These costs include the whole of the plan preparation process, the costs of procuring detailed pieces of evidence that cannot be undertaken internally, such as viability evidence, Habitats Regulations Assessment etc.

Indirect Costs

- 5.62 The preparation of a new LDP also requires input from other service areas within the Council, most notably from Highways, Environmental Health, Countryside (ecology and landscape) and Housing. The input required from these service areas is, in most cases, additional to their normal duties and the costs which will be incurred as part of the LDP process has not been factored into their respective budgets to date.
- 5.63 An assessment of the additional costs likely to be incurred by these service areas has been undertaken and has been based on the time and work undertaken by these services in preparing the Adopted LDP. It is estimated that the additional costs of preparing the LDP is in the region of £220,000 and covers the additional work and any procurement of any consultancy services necessary to provide the service area expert advice and input, e.g. traffic modelling, air quality modelling, ecological & landscape assessment.

Programming The Costs

- 5.64 The costs of preparing an LDP are not realised consistently throughout the plan preparation process. The major costs associated with the LDP preparation process are generally incurred during two specific periods: the first period of major costs are incurred during the gathering of the evidence base to support the plan during the first

year or so of the process. The second period of major costs are associated with the Examination of the plan by an independent Planning Inspector generally in the third year of LDP preparation.

- 5.65 In making provision to ensure that sufficient finance is made available to prepare the LDP it is important that the budgets reflect the periods of high costs to ensure that sufficient finance and resources are available and that the LDP preparation is not delayed due to financial constraints.

Associated Work Costs of Commencing LDP Preparation

- 5.66 Over the past 3 years the Strategic and Development Plans team have had a critical role in the preparation of policy documents focussing on the delivery of allocations within the LDP and promoting regeneration opportunities within the current land use planning framework. This work has included the preparation of 'A Foundation for Success: The Regeneration Strategy for the County Borough' and Masterplans for both Caerphilly Basin and Ystrad Mynach.
- 5.67 'A Foundation for Success' identifies that a suite of masterplans needed to be prepared to provide more detailed proposals, to supplement the overarching framework for the county borough. 2 Masterplans have already been approved by the Council, namely the Caerphilly Basin and Ystrad Mynach Masterplans, whilst the Heads of the Valleys Regeneration Area Masterplan is in preparation. Work has yet to commence on the remaining 2 Masterplans. It is important that the regeneration framework is completed to ensure that funding sources can be sought for proposals throughout the whole of the county borough to aid the delivery of the Council's regeneration objectives.
- 5.68 The commencement of the review of the LDP, together with an ongoing involvement in the SDP plan preparation process, will mean that the team will no longer have sufficient capacity and resources to lead on Masterplan delivery in addition to delivering the Replacement LDP. Consequently it is recommended that a two-year, fixed term post be created with responsibility for delivering the remaining 2 Masterplans for Greater Blackwood and the Newbridge to Risca Corridor.
- 5.69 It is recommended that the post would need to be at the Planning Officer level (grade 9) in order to be of a sufficient grade to undertake the duties of the post. It is anticipated that the remaining 2 Masterplans would take 2 years to complete. As such it is recommended that a 2-year, fixed term Planning Officer post be created at a cost, including on costs, of £44,615 per year (not including pay inflation) and that the cost is met from the Communities Directorate Service Reserves.

Overall Conclusion

- 5.70 The 2019 Annual Monitoring Report identifies that significant progress has been made with the implementation of the Adopted LDP but a review of the Adopted LDP is now urgently required. The Council has already considered a report seeking agreement of the Council to commence the preparation of the SDP and, subject to agreement, this requirement would have been met.
- 5.71 This report considers the options for LDP revision and has concluded that a full review of the LDP should be undertaken.
- 5.72 In order to facilitate the Review of the LDP provision needs to be made to meet the anticipated costs of plan preparation in the order of £615,000 in direct costs and

£220,000 in indirect costs. The Council will, therefore need to make provision in the region of £835,000 over the next four years to deliver the Replacement LDP..

- 5.73 The report also concludes that a 2-year fixed term planning officer post be created to complete the preparation and publication of the Council's regeneration framework at a cost of £44,615 per annum.

6. ASSUMPTIONS

- 6.1 The timescales for the delivery of the SDP assume preparation in accordance with the timetable set out in Appendix C of the Strategic Development Plan Commencement report, which is also due to be considered at the Council meeting on 23rd October. The timescales for the preparation of an LDP Review and LDP Lite are based on the indicative timescales for the preparation of development plans within the draft Development Plans Manual (Edition 3) produced by Welsh Government.
- 6.2 The estimates of the costs for preparing the Replacement LDP are assumptions based upon the costs of preparing the Adopted LDP, with associated increases due to inflation and estimates of costs to undertake additional work. Similarly the Council contributions towards the preparation of the SDP are based upon estimates of costs based upon the recommended structure and process set out in the Strategic Development Plan Commencement report.

7. LINKS TO RELEVANT COUNCIL POLICIES

- 7.1 The following Council plans and policies are relevant to the Local Development Plan:

Corporate Plan 2018-2023.

- 7.2 As the key land use planning document for the Council, the LDP assists in delivering the 6 Corporate Plan Objectives:

Objective 1 - Improve education opportunities for all

The LDP will provide the local planning framework to assist in the delivery of the land use aspects associated with this objective, including:

- Tackling poverty
- Providing economic conditions to encourage economic growth and skills development
- Assist in the delivery of the City Deal Digital Strategy
- Providing the land use framework to deliver the right schools in the right places

Objective 2 - Enabling employment

The LDP will identify land to facilitate the development of new employers and the expansion of existing businesses.

Objective 3 - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's well-being

The LDP will set out the local framework to deliver the range and quality of housing to meet this objective and its outcomes through policies supporting sustainable levels of housing development to meet the needs of all residents

Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impacts on the environment

The LDP will provide the local level framework that will assist in the delivery of the South East Wales Metro programme, which seeks to deliver a transformative transport system that increases accessibility throughout the County Borough and the wider region.

Objective 5 - Creating a county borough that supports a healthy lifestyle in accordance with the sustainable Development Principle within the Wellbeing of Future Generations (Wales) Act 2015

The LDP will set out the local policy framework that will facilitate the creation of healthier places, providing opportunities to create environments that engender healthy lifestyles, whilst ensuring access to much needed housing and employment opportunities.

Objective 6 - Support citizens to remain independent and improve their well-being

The LDP will set out the local policy framework that will facilitate the support infrastructure and services necessary to support the residents of the county borough. It will also set out requirements as for new homes, job opportunities that will provide employment and homes for the county borough's residents, assisting them to remain independent as well as improving their well-being.

8. WELL-BEING OF FUTURE GENERATIONS

8.1 The LDP is the strategic land use document for the County Borough setting out how and where sustainable development will be delivered. It is a cross-cutting plan that considers issues around housing, employment, transport, infrastructure, community facilities, education facilities, leisure and tourism, heritage and environmental assets. The AMR recommends a review of the LDP, which will set a framework to deliver all seven well-being Goals:-

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh Language
- A globally responsible Wales

8.2 The five ways of working are integral to the preparation of the Replacement LDP. Any Replacement LDP will demonstrate the five ways of working:

- Long Term – The preparation of the Replacement LDP is about planning for the future (typically a 15 year plan period) in a sustainable way.
- Prevention – plan preparation is built on a robust evidence base which considers key issues and how to respond to them in a manner that prevents any issues deteriorating and seeks to address key land use matters
- Integration – the preparation of a development plan will be bring together all

land use planning issues relevant at a local level involving our partners, residents, visitors, employers and service providers in the formulation of the Plan. The LDP will also need to be in general conformity with other planning tiers, including the NDF and SDP.

- Collaboration – the preparation of an LDP will be a key collaboration project reflecting the land use priorities of multiple Council departments and Public Service Board Partners, as well as external stakeholders.
- Involvement – preparation of an LDP will provide numerous opportunities to engage with our stakeholders, residents and customers, including the business community and will ensure that we are listening to a wide range of views to inform the plan and decision making process.

9. EQUALITIES IMPLICATIONS

- 9.1 There are no direct implications associated with this report. Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA) will both be required as part of the preparation of the Replacement LDP. Furthermore, the SEA/SA will need to conform with all relevant legislation and as such will also need to include Health and Equalities Impact Assessments as part of an holistic Integrated Impact Assessment. These issues will be addressed as part of the preparation of the Replacement LDP in an integrated process throughout the plan preparation period.

10. FINANCIAL IMPLICATIONS

- 10.1 In order to facilitate the review of the LDP, provision needs to be made to meet the anticipated costs of plan preparation in the order of £615,000 in direct costs and £220,000 in indirect costs. The Council will, therefore, need to make provision in the region of £835,000 over the next 4 years from corporate budgets. The justification for these costs are set out in paragraphs 5.58 to 5.65 above.
- 10.2 The report also recommends that a new two-year, fixed-term planning officer post be created to complete the preparation and publication of the Council's regeneration framework at a cost of £44,615 per year (including on costs but excluding pay inflation). The justification for the creation of this post is set out in paragraphs 5.66 to 5.69 above.

11. PERSONNEL IMPLICATIONS

- 11.1 The report recommends that a new two-year, fixed-term planning officer post be created to deliver the remaining Masterplans for the county borough. The justification for the creation of this post is set out in paragraphs 5.66 to 5.69 above.
- 11.2 It is considered that this post should be advertised as a two-year, fixed-term Grade 9 Planning Officer post at a cost, including on costs, of £44,615 per year (excluding pay inflation).

12. CONSULTATIONS

- 12.1 All responses from consultations have been incorporated into the report.

13. STATUTORY POWER

- 13.1 The Planning and Compulsory Purchase Act 2004 requires the Council to prepare and keep under review a Local Development Plan for the County Borough to act as a single framework for the control and use of land within its administrative boundary.
- 13.2 The Local Government Act 1998. The Local Government Act 2003. The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. The Planning (Wales) Act 2015

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Consultees: Cllr E. Stenner – Cabinet Member for Environment & Public Protection/Planning
Cllr Sean Morgan, Cabinet Member for Economy, Infrastructure, Sustainability & Wellbeing of Future Generations Champion (Chair)
Christina Harrhy, Interim Chief Executive
Mark S. Williams, Corporate Director Communities
Dave Street, Corporate Director, Social Services
Richard Edmunds, Corporate Director of Education and Corporate Services
Steve Harris, Interim Head of Business Improvement and Acting Section 151 Officer
Rhian Kyte, Head of Regeneration and Planning
Marcus Lloyd, Head of Infrastructure
Rob Hartshorn - Head of Public Protection, Community and Leisure Services
Keri Cole – Chief Education Officer
Mark Williams, Interim Head of Property Services
Clive Campbell - Transportation Engineering Manager
Christopher Adams – Highway Engineering Group Manager
Allan Dallimore, Regeneration Services Manager
Kath Peters, Corporate Policy Manager
Tim Stephens – Development Control Manager
Mike Headington – Green Spaces and Transport Services Manager
Phillip Griffiths – Green Spaces Strategy and Cemeteries Manager
Mike Eedy - Finance Manager
Anwen Cullinane, Senior Policy Officer (Equalities and Welsh Language)
Lynne Donovan, Head of People Services

Appendices:

Appendix 1 – Indicative Delivery Timeframe and Budget Requirement for the Review of the LDP

Background Papers:

Caerphilly County Borough LDP Annual Monitoring Report 2019

[Made available in the members' resource library and on the members' portal]

Caerphilly County Borough LDP Annual Monitoring Report 2019 – Background Tables

[Made available in the members' resource library and on the members' portal]

Indicative Delivery Timeframe and Estimated Budget Requirements

Calendar Year	2019			2020				2021				2022				2023				2024				2025																			
Month	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4
	Agreement to commence LDP Preparation			DA Agreed by WG				Preferred Strategy Consultation				Deposit Consultation				Submission to WG For Examination				LDP Examination				Adoption of LDP																			
	Financial Year 1 2019 / 2020			Financial Year 2 2020 / 2021				Financial Year 3 2021 / 2022				Financial Year 4 2022 / 2023				Financial Year 5 2023 / 2024				Financial Year (Slippage) 2024 / 2025																							
SDP Costs	£0			£85,000				£85,000				£85,000				£85,000				£85,000					£425,000																		
LDP - Direct Costs	£60,000			£95,000				£20,000				£80,000				£285,000				£75,000					£615,000																		
LDP - Indirect Costs	£0			£180,000				£40,000				£0				£0				£0					£220,000																		
Total	£60,000			£360,000				£145,000				£165,000				£370,000				£160,000					£1,260,000																		