

Report to **South Downs National Park Authority**
Date **14 December 2022**
By **Director of Planning**
Title of Report **Local Plan Review and the Local Development Scheme**
Decision

Recommendation: The Authority is recommended to:

- 1. Note the current uncertainty in national and regional planning matters and the Authority's resourcing for the in development Shoreham Cement Works Area Action Plan and Local Plan Review**
 - 2. Approve the integration of the in development Shoreham Cement Works Area Action Plan into the Local Plan Review**
 - 3. Approve the Local Development Scheme (eighth revision) for the South Downs National Park, incorporating a revised timetable for the Local Plan Review, as set out in Appendix I of this report.**
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Executive Summary

- This report is about the incorporation of the in development Shoreham Cement Works Area Action Plan (AAP) into the Local Plan Review (LPR) and to seek approval of the revised timetable for the LPR as set out in the Local Development Scheme (LDS).
- Two options have been proposed by officers namely to progress the AAP separately to the LPR or to integrate them into one document.
- Taking into account the potentially deep changing national context for planning the need for efficiency and certainty for the public, officers, and Members alike, it is recommended that the AAP and the Local Plan Review are integrated into one document.
- Following on from a steer from Members and SMT, officers have been working on a project plan for this consolidated document. There will be a delay of about a year to 18 months on the timetable for the preparation of the Local Plan Review from what was agreed by the Authority in May this year.
- There is a small risk to delaying the timetable of the LPR (as detailed in the report), but this is reduced by the fact that the National Park is a protected landscape and so is not expected to meet its development need, nor does it have set targets to meet against which it is assessed. Furthermore, there is a risk in progressing as currently set out in the LDS given the uncertain future of AAPs.
- The eighth review of the LDS has been triggered by the proposed integration of the AAP for Shoreham Cement Works into the Local Plan Review. The LDS sets out the timetable that the South Downs National Park Authority (SDNPA) will follow in the preparation and adoption of planning policy documents.

I. Background

- 1.1 This report is about the incorporation of the Shoreham Cement Works Area Action Plan (AAP) into the Local Plan Review (LPR). It follows on from informal discussions with Members including a Local Plan Review Workshop held on 17 November 2022 open to all Members and a meeting of the Senior Management Team on 26 September 2022.
- 1.2 This report provides background information on the preparation of the AAP and the LPR. It includes updates on progress with the two Plans, current uncertainty in plan making, resourcing and risks. Two options have been proposed by officers namely to progress the AAP separately to the LPR or to integrate them into one document. The advantages and disadvantages of each option are set out in this report. The strong steer from both the Member Workshop and SMT is to integrate the two Plans. That is the recommendation of this report.
- 1.3 The integration of the two plans requires the Authority to update our Local Development Scheme (LDS), which is set out in Appendix I. This includes the timetable for the LPR itself and supplementary planning documents (SPD)

2. Progress on the AAP and LPR

- 2.1 Work on the AAP thus far has culminated in the publication of the Issues & Options version of the Plan for public consultation in June 2022. A Member Task & Finish Group was set up to guide the preparation of the Plan. A considerable amount of work went into filming drone footage and commissioning consultation videos of the site; they were both very well received. A total of 2,858 representations were received on the AAP from 226 organisations and individuals; these are currently being processed.
- 2.2 The decision to start work on the Local Plan Review was made at a National Park Authority meeting in May 2022. It was explained this would be a modest review and that many of the key components of the existing Local Plan, such as a landscape-led approach and use of ecosystem Services and integrating land management with land use in order to create good places for people to live work and visit would remain.
- 2.3 Since May 2022 the Authority has launched a Call for Sites, started work on the Land Availability Assessment and commissioned a Housing and Development Needs Assessment (HEDNA). The Authority wrote to all town and parish councils in the National Park in June asking them to work collaboratively with us on the LPR rather than prepare reviews of their neighbourhood plans. The Authority also asked them to submit sites for the Land Availability Assessment. Work on the LPR is accompanied by work on neighbourhood plans and neighbourhood priority statements.

3. Current uncertainty in plan making

- 3.1 There is a considerable amount of uncertainty in plan making at the moment. The radical changes proposed in the Planning for the Future White Paper in 2020 were not forthcoming, but the Levelling Up and Regeneration Bill (LURB) published in May this year and currently going through Parliament would make significant changes to plan making once enacted. The proposed summer consultation on the NPPF has not been forthcoming and a recent vote on an amendment to the LURB that sought to make housing targets advisory rather than mandatory was pulled in November.
- 3.2 The change that is most relevant to this report is that, if the LURB goes forward, there will be a single local plan for a local planning authority and any additional plans such as Area Action Plans will potentially be demoted to a supplementary plan. Minerals & Waste Plans will remain unchanged. A supplementary plan must be in general conformity with the spatial development strategy. Its examination will be by written representations rather than carried out in person.
- 3.3 The other significant and relevant change, if the LURB goes forward, is that there will be National Development Management Policies. Further details on this are awaited, but it is likely that most of the park wide policies in our Local Plan would be superseded by national policies and there would be reduced scope for developing new innovative policies in the

LPR.

- 3.4 There is also uncertainty for plan making on a sub-regional level. Part of the National Park that includes Shoreham Cement Works is located in the Sussex North Water Resource (Supply) Zone where there is currently a moratorium on all new development that would result in a net increase in water consumption. This has stalled all local plans in the area. Work is underway on a joint strategy to address the issue of water abstraction on international nature designations.
- 3.5 Following on from the prioritisation exercise across the Authority there is a modest reduction in resource to progress the AAP and LPR. Given the above priority for the organisation is to work on the LPR. Progress on the AAP is at our own discretion. As we work in partnership with the counties on minerals and waste plans we are locked into pre-agreed timetables for their progression.
- 4. Options going forward**
- 4.1 Two options have been proposed by officers namely to progress the AAP separately to the LPR or to integrate them into one document. The advantages and disadvantages of each option are set out below. The recommendation of this report is to integrate the two plans as set out at paragraph 4.3.
- 4.2 The first option is to carry on with preparing a separate AAP and LPR with a delayed timetable due to resourcing. The main advantage of this is that it is in line with the commitment set out in Policy SD56 of the Local Plan, which was noted in our Inspector's report. The Issues & Options version of the AAP stated that there would be a Preferred Option version of the Plan, which would be consulted on. Twin tracking should mean that the AAP would be adopted ahead of the LPR. This would provide earlier certainty for the strategic site ahead of any planning application. However, no application is imminent and no Pre-Application Agreement has been signed. The main disadvantage of twin tracking is what the future holds for the status of AAPs in general and the cost both in terms of people and money. It obviously costs more to prepare, consult on and undergo two examinations in public on two separate plans. There is also a significant unknown at the moment relating to the site as regards water neutrality which halts any development until a strategic solution is forthcoming.
- 4.3 The second option is to integrate the AAP into the LPR, so that Shoreham Cement Works becomes a single 'chapter' of the LPR rather than a standalone document. The main advantage of this is that it would be less resource intensive both in terms of the evidence base required and the resource, both financial and in officer time. Although this option does not comply with the original Local Plan commitment to preparing an AAP, this can be simply addressed with a clear audit trail of decision-making and some explanatory text in the LPR. The change can be justified by the proposed demotion in the LURB of AAPs to supplementary plans and the need to further explore the challenges of water neutrality on the site. The main disadvantage is that it would take about a year longer to progress plan making for the site and would result in some evidence studies particularly viability and transport becoming out of date albeit we have only done light touch assessment on these areas at this Regulation 18 stage. Another disadvantage is that members of the public and key stakeholders may become confused by the change in plan making for the site. We would need to explain our decision making clearly, particularly to the local community groups. This is balanced against avoiding possible confusion by running two plans with multiple consultations and engagement with communities and businesses.
- 4.4 Whichever option is progressed there is a risk from the delay in plan making. As our Local Plan was adopted in July 2019, it will be five years old in July 2024. It is a legal requirement and stated in paragraph 33 of the NPPF that local plans should be reviewed as to whether they need updating at least once every five years, and then updated as necessary. If the Authority does not have an up to date adopted local plan it could, in theory, open the Authority up to planning by appeal albeit National Parks are one of the areas mentioned in the NPPF where applications can be refused if there is a clear reason (NPPF, paragraph 11). The emerging Local Plan Review will only start to have meaningful weight in decision making

when it reaches the Pre-Submission stage. Under the proposed timetable for the integrated LPR this will be in quarter 4 of 2025-26. However, the risk is reduced by the fact that the National Park is a protected landscape as referred to above and is not expected to meet its development provision, nor does it have set targets to meet against which we are assessed. It should be noted that none of the local authorities covered by the National Park currently have an up to date plan as defined by the NPPF, nor does 60% of the country. A new Local Plan for Worthing is expected to be adopted on 13 December 2022.

- 4.5 A plan is also considered out of date by the NPPF when the local planning authority cannot demonstrate a five-year housing land supply. The 2022 Authority Monitoring Report, due to be published this month, will state that we have a deliverable housing land supply of 5.9 years. Going forward it will be important that this supply is maintained. Furthermore, notwithstanding the relatively healthy housing supply position at the moment, it should be noted that the National Park Authority is not subject to the Housing Delivery Test unlike our neighbouring local planning authorities.

5. Recommended way forward

- 5.1 Taking into account the constantly changing national context for planning and the economy, the need for efficiency at the National Park Authority and the small risk to the National Park as outlined above, it is recommended that the AAP and the Local Plan Review are integrated into one document. Following on from a steer from Members and SMT, officers have been working on a project plan for this consolidated document. Table 1 sets out the milestones in the current Local Development Scheme for both the AAP and the LPR along with the proposed milestones for the new consolidated document.

Table 1: Existing and proposed milestones for the AAP and Local Plan Review

Stage	Existing AAP	Existing LPR	Proposed LPR
Regulation 18 consultation	Completed Q2 2022-23	Q3 2023-24	Q4 2024-25
Regulation 19 Pre-Submission consultation	Q4 2022-23	Q3 2024-25	Q4 2025-26
Submission for examination	Q1 2023-24	Q4 2024-25	Q2 2026-27
Examination & consultation on Main Mods	Q1 2023-24 to Q3 2023-24	Q4 2024-25 to Q3 2025-26	Q2 2026-7 to Q1 2027-28
Adoption	Q3 2023-24	Q3 2025-26	Q1 2027-28

- 5.2 The integration of the two plans requires the Authority to update our Local Development Scheme (LDS), which is set out in Appendix 1. This includes the timetable for the LPR itself and supplementary planning documents (SPD).
- 5.3 This recommended way forward is not intended to detract from the work on the AAP that has been done to date. We have prepared a number of robust evidence based studies that will support the LPR. The drone footage and the consultation videos gave us the opportunity to learn about digital engagement and were very well received. We carried out the first comprehensive public consultation on the site. These are lessons that we will carry forward to the LPR including a chapter on Shoreham Cement Works.

6. Resources

- 6.1 Local plans are expensive documents to prepare. The main costs for the LPR will be from evidence gathering that will be mainly at the beginning of the process and the examination that will be at the end. An estimated budget of £484K has been identified and set aside for the progressing the LPR up to adoption.

6.2 People are needed to prepare local plans. As previously stated, this is a review rather than a brand new plan requiring less resource. As done previously, as well as to ensure Corporate Plan priorities are achieved as far as we can within the planning system, some colleagues across the Authority may assist. This would be in a variety of ways, for example, the Performance and Projects team assisting with project management and Support Services assisting with logging representations.

7. Next steps

7.1 Following on from this decision the Authority will undertake the Local Plan Review in line with the timetable set out in the LDS.

7.2 If agreed, appropriate communication with stakeholders, particularly local community groups, will take place to explain the decision.

8. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Not on the LDS. However, future reports will come to Planning Committee and the Authority as the Local Plan Review progresses.
Does the proposal raise any Resource implications?	<p>Yes, these are summarised in section 6 of this report. The LPR is identified as a corporate priority for the next three years of the Corporate Plan. Officers within the Planning Policy team are leading the work on developing the LPR and utilising expertise elsewhere within the Authority. Costs associated with the delivery of the Local Plan will be monitored and any variation to approved budgets will be reported as part of the budget monitoring process.</p> <p>There are resource implications for the preparation of all the planning policy documents named in the LDS but these are within scope of the resources.</p>
How does the proposal represent Value for Money?	We will seek to achieve best value in all the work we do on the LPR and all the documents named in the LDS.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	<p>The LPR will follow on from and be consistent with the PMP 2020-25 and will therefore deliver on most of its objectives. The key ones to highlight are:</p> <ul style="list-style-type: none"> • 1.1 Protect landscape character • 3.1 Join up habitats • 4.1 Conserve heritage • 5.2 Improve accessibility • 9.1 Increase affordable housing • 10.1: Strengthen enterprise • 10.3: Promote sustainable tourism
Links to other projects or partner organisations	The LPR and all the other documents named in the LDS link to other plans and programmes and the duty to co-operate will involve partner organisations and those with interests e.g. Natural England and the Environment Agency.

Implication	Yes*/No
How does this decision contribute to the Authority's climate change objectives	Reviewing the Local Plan provides us with the opportunity to prepare more ambitious policies on climate change both in terms of mitigation and adaptation.
Are there any Social Value implications arising from the proposal?	The requirements of the Public Services (Social Value) Act 2012, will be considered for appropriate expenditure and programmes undertaken by the Authority
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	None for this decision. A full Equality Impact Assessment will be carried out for the LPR and the policies within. We are keen to engage new audiences in our plan making particularly younger people. We have started to do this through digital engagement with the Shoreham Cement Works Area Action Plan and we will use the lessons learnt from that for the LPR.
Are there any Human Rights implications arising from the proposal?	The emerging policies will be considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.
Are there any Crime & Disorder implications arising from the proposal?	It is considered that the proposal does not raise any crime and disorder implications.
Are there any Health & Safety implications arising from the proposal?	None
Are there any Data Protection implications?	None for this decision. There are data protections implications from the statutory consultations that we will hold on the LPR and the other documents in the LDS. We have recently carried out a task to review the personal details we hold for the purposes of updating people on Local Plan matters and that we are compliant with GDPR.
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	None for this decision. There are sustainability implications for the LPR and all the documents named in the LDS. Therefore, a Sustainability Appraisal will be prepared iteratively for the LPR to inform decision-making.

9. Risks Associated with the Proposed Decision

9.1 Further detail on risks are set out in section 4 of this report.

Risk	Likelihood	Impact	Mitigation
Radical changes to legislation and national policy on planning	2	3	Keep up to date with Government changes and keep a flexible approach to policy formulation, such as the recommendation to incorporate the AAP into the LPR.
Issues arising from the Habitat Regulations particularly nutrient neutrality (Solent and Itchen) and water neutrality (Arun Valley) that pose a risk to plan making in	3	4	We are working closely with the statutory bodies and our neighbouring local authorities on a strategic approach to resolving the issues

Risk	Likelihood	Impact	Mitigation
the National Park.			
As a result of an out of date Local Plan the National Park and the Authority is adversely impacted by speculative planning applications, which are then lost at appeal.	2	4	The National Park Authority is not subject to the Housing Delivery test unlike other LPA's. There is therefore limited risk of Planning by appeal in relation to housing. Furthermore whilst a plan may be considered out of date by the NPPF when the local planning authority cannot demonstrate a five-year housing land supply, the 2022 Authority Monitoring Report, due to be published this month, will state that we have a deliverable housing land supply of 5.9 years. There is also a key footnote in the NPPF that states that applications within National Parks can be refused if there is a clear reason to do so (NPPF, paragraph 11).
Reduced resource in the Planning Policy Team working on the LPR, NDP reviews and Minerals & Waste	3	3	Less resource is required for a review than for a brand new plan. There will be reduced input to other work streams and consultants would be used for one off specific pieces of work. The recommendation to incorporate the AAP into the LPR reduces the resource requirement.

TIM SLANEY

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Appendices I. Draft SDNPA Local Development Scheme

SDNPA Consultees Chief Executive; Director of Countryside Policy and Management; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services, Business Service Manager

External Consultees None

Background Documents [South Downs Local Plan](#)
[Shoreham Cement Works AAP: Issues & Options](#)
[Full Authority report on the Local Plan Review and the Local Development Scheme \(May 2022\)](#)
[National Planning Policy Framework](#)
[Planning Practice Guidance](#)



South Downs National Park
Local Development Scheme
(Eighth Revision)
December 2022

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The Local Development Scheme is also available on the SDNPA website:
www.southdowns.gov.uk

CONTENTS

CHAPTERS

	PAGE
1. Introduction	1
2. The development plan for the South Downs National Park	2

APPENDICES

	PAGE
1. Local Development Scheme	4

I. INTRODUCTION

- I.1** The Local Development Scheme (LDS) sets out the timetable that the South Downs National Park Authority (SDNPA) will follow in the preparation and adoption of planning policy documents.
- I.2** This is the eighth review of the LDS for the South Downs National Park and has been triggered by the integration of the Shoreham Cement Works Area Action Plan into the Local Plan Review (LPR). It provides a revised programme for the production of the following Local Plan Documents:
- South Downs Local Plan Review (LPR)
 - Neighbourhood Development Plans (NDP)
 - Supplementary Planning Documents (SPDs)
 - Joint Minerals and Waste Plans
- I.3** An LDS is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). Paragraph 003 of the Planning Practice Guidance Paragraph (Reference ID: 61-003-20190315)¹ states that it must specify, among other matters, the documents which, when prepared, will comprise the Local Plan for the area. It must be made available publically and kept up-to-date. It is important that local communities and interested parties can keep track of progress. Local planning authorities should publish their Local Development Scheme on their website.
- I.4** There are obviously a number of risks in preparing planning policy documents and a risk register is prepared and updated for each of the named plans. A significant risk is major changes to national legislation on planning. There is a considerable amount of uncertainty in plan making at the moment. The sweeping changes proposed in the White Paper *Planning for the Future* in 2020 were not forthcoming, but the Levelling Up and Regeneration Bill, introduced to parliament on 11 May 2022 and currently going through parliament, would make significant changes to plan making once enacted. There are also a number of rapidly evolving issues that could have a significant impact on plan making particularly nutrient neutrality in the Solent area and water neutrality in the central area of the National Park.
- I.5** We also need to be mindful of pre-election periods commonly known as ‘purdah.’ The SDNPA will not launch public consultations on any of its plans during these periods and this may obviously impact on the LDS set out in this document.
- I.6** Progress on the LDS is reported annually in the Authority Monitoring Report (AMR)².

THE DEVELOPMENT PLAN FOR THE SOUTH DOWNS NATIONAL PARK

¹ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/plan-making)

² [Authority Monitoring Reports - South Downs National Park Authority](#)

- 2.1** The development plan for the South Downs is made up of the adopted South Downs Local Plan which covers the National Park in its entirety, a number of made Neighbourhood Development Plans (NDP) which cover individual parishes and several adopted minerals and waste plans prepared at a county level. The detailed Local Development Scheme (LDS) for these Plans is set out in Appendix I of this document and the highlights are set out below.

Local Plan Review

- 2.2** The South Downs Local Plan was adopted in July 2019. The Planning Committee of the South Downs National Park Authority (SDNPA) agreed to start work on the Local Plan Review (LPR) in May 2022. It will take full account of other relevant strategies and plans including the Partnership Management Plan (2020-25) and the Statement of Community Involvement (SCI) (updated 2022).
- 2.3** A revised timetable for the LPR was approved by the Authority on 14 December 2022. The timetable was revised to integrate the Shoreham Cement Works Area Actions Plan (explained further below) into the LPR which takes into account the potentially deep changing national context for planning, the need for efficiency and certainty for the public, officers and Members alike. There will be a delay of about a year to 18 months on the timetable for the preparation of the Local Plan Review from that agreed by the Authority in May this year.
- 2.4** Evidence gathering for the LPR and the completion of a park-wide Land Availability Assessment will take place during 2023-24. The Regulation 18 consultation is scheduled for Q4 2024-25 (during January to March 2025). The aim to present the Pre-Submission version of the LPR to Planning Committee and a full Authority meeting in Q3 2025-26 (during October to December 2025). This would be followed by a public consultation in early 2026 and then submission for examination. The intention is that the LPR will be adopted early in 2027.

Shoreham Cement Works Area Action Plan

- 2.5** Policy SD56: Shoreham Cement Works of the Local Plan identifies this strategic site as an area of significant opportunity for an exemplar sustainable mixed use development. The policy states that the SDNPA will prepare an Area Action Plan (AAP) for the site.
- 2.6** A Regulation 18 Issues & Options version of the AAP was published for public consultation in June 2022. In order to encourage more people to take part in the consultation we have commissioned drone footage of the site and are using digital engagement techniques; these were very well received. A total of 2,602 representations were received on the AAP from 226 organisations and individuals; these are currently being processed.
- 2.7** The LDS has been revised to integrate the AAP as a chapter in the LPR rather than as a separate AAP document. This is to take into account of the emerging changing policy from the Levelling-Up and Regeneration Bill which intends for there to be a single local plan for a local planning authority and any additional plans such as Area Action Plans will potentially be demoted to a supplementary plan. This also takes into

account the on-going work to address water neutrality, and the need for efficiency and clarity, for example avoiding confusion of running two plans with multiple consultations and engagement across similar timeframes.

- 2.8** The integration of the AAP into the LPR does not detract from the work on the AAP that has been done to date. We have prepared a number of robust evidence based studies that will support the LPR. The drone footage and the consultation videos gave us the opportunity to learn about digital engagement and were very well received. We carried out the first comprehensive public consultation on the site. These are lessons that we will carry forward to the LPR including a chapter on Shoreham Cement Works.

Neighbourhood Development Plans

- 2.9** The South Downs Local Plan established the strategic planning policy framework for the preparation of Neighbourhood Development Plans (NDP) in the National Park. As of December 2022 there were a total of 60 areas designated for the purposes of neighbourhood planning and 42 NDPs made part of the development plan.
- 2.10** This LDS does not set out the timetables for individual NDPs and their reviews. Those qualifying bodies that chose to review their NDPs in light of the LPR will need to make good progress in their plan making so that there are no gaps in the development plan for the National Park.

Minerals & Waste Plans

- 2.11** The SDNPA is responsible for planning for the future management of waste and production of minerals within the South Downs National Park. We are working in partnership with the mineral and waste planning authorities in Hampshire, West Sussex, Brighton & Hove and East Sussex Councils on a number of local plans. To avoid duplication we do not report separately on minerals & waste plans in this LDS. The highlights are set out below.
- 2.12** The SDNPA is working in partnership with East Sussex County Council and Brighton & Hove City Council on the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Review. Full details on the LDS can be found on the East Sussex website³.
- 2.13** The SDNPA is also working in partnership with Hampshire County Council, Portsmouth City Council, Southampton City Council and the New Forest NPA. A Partial Review of the Hampshire Minerals and Waste Plan is underway. Full details on the LDS can be found on the Hampshire website⁴.
- 2.14** Finally, the SDNPA is working in partnership with West Sussex County Council. No plans are currently being prepared in West Sussex and full details on the LDS can be found on the West Sussex website⁵.

³ [East Sussex waste and minerals monitoring reports | East Sussex County Council](#)

⁴ [Hampshire Minerals and Waste Plan | Hampshire County Council \(hants.gov.uk\)](#)

⁵ [Monitoring reports - West Sussex County Council](#)

Supplementary Planning Documents

- 2.15** Supplementary Planning Documents (SPDs) provide more detailed guidance to explain policies and proposals set out in the Local Plan. A number of SPDs have been prepared and adopted since the adoption of the Local Plan. The SDNPA also adopts Village Design Statements as SPDs for those parts of the National Park that they individually cover. Those for Easebourne, West Meon, and Selborne are nearing completion and feature in the LDS.

APPENDIX I: LOCAL DEVELOPMENT SCHEME

		2023-24				2024-25				2025-26				2026-27				27-28				
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Local Plan Review									18				19		S	E	M	A				
ES LPR, Hampshire LPR & WS Mineral Plan Review	<i>Please see ESCC, HCC & WSCC websites for details</i>																					
West Meon VDS SPD		A																				
Selborne VDS SPD		A																				
Easebourne VDS SPD	A																					

Key to Local Development Scheme

Symbol	Stage in document preparation
S	Submission of documents and information to the Secretary of State
E	Independent examination
M	Consultation on proposed modifications
A	Adoption
13	Representations on a supplementary planning document
18	Representations on the preparation of a local plan
19	Representations on a local plan