

### Annex 3 - Implications of proposed revisions to the NPPF

NPPF Paragraph	Change	Implications for Local Plan	Current Local Plan Commitments	Further work required	Additional cost	LP Timetable implication	Main Risks – see Annex 5
Chapter 3 – Planning for the homes we need							
1 & 61	<p>Makes it clear the importance of planning to meet housing need as per the standard method, removing ‘opt outs’ such as not meeting need in ‘exceptional circumstances’ and ‘alternative approaches’.</p> <p>Deletion that the standard method is the advisory starting point.</p>	<p>Meeting housing need using the standard method is mandatory with LPAs expected to make all efforts to allocate land in line with housing need.</p> <p>Should it not be possible to meet housing need then this will need to be justified through local plan consultation and examination. A robust evidence base will be critical to support plan-making and decisions made</p>	<p>Through the plan-making process the Council is considering and testing sites to understand whether it can meet its housing need requirement, alongside gathering evidence to support plan-making.</p>	<p>To further test sites taking into account any future NPPF revisions and evidence to understand whether need can be met in full.</p> <p>If need cannot be met in full, then to discuss TMBCs unmet need with relevant LPAs.</p>	<p>Yes – associated with reviewing and updating evidence base work already undertaken and gaining further evidence to inform spatial strategy testing. A Green Belt review and landscape evidence will be pertinent to progressing the plan and testing sites.</p>	<p>Yes – the plan will need to be informed by evidence and testing prior to publishing a further Regulation 18 consultation.</p>	<p>Duty to Cooperate discussions will be required to discuss need and unmet need</p> <p>Delay to obtaining the evidence base and testing required.</p> <p>Availability of expert consultants to undertake the work.</p> <p>Evidence base and plan-making costs</p> <p>Meeting the plan</p>

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		will be tested / scrutinised at examination including the ability to meet other LPAs unmet need, as relevant.					submission deadline  <b>Risk No. 11, 28, 37, 39 and 40</b>
62	The uplift to the standard method and housing need to 20	No direct implication for TMBC beyond that considered	N/A	N/A	N/A	N/A	N/A

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	cities/urban areas is removed.	below in relation to the standard method.					
130	Removal of text providing an 'opt out' for higher densities, if it would result in	Localised design codes and masterplans for strategic	The PlaceMaker software uses several criteria to make assumptions around	Further evidence required to understand appropriate	Yes – Characterisation and Density Study.	Yes – Will need to understand appropriate densities	Delay to obtaining the required evidence base and /

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	development being out of character with the existing area.	<p>development are proposed to be the vehicle for understanding appropriate densities for strategic sites.</p> <p>The Council will need to ensure that proposed densities in urban areas are sufficiently uplifted to represent an efficient use of land.</p>	appropriate densities by location, which provides a starting point.	densities including further site visits, partnership working with site promoters to progress localised design codes and masterplans for strategic sites, alongside procuring a TMBC density and characterisation study.	Resources to support work with site promoters to deliver design codes / masterplans.	when identifying housing numbers for site allocations.	<p>or information from site promoters, which will be required prior to further testing plan options given the implications on housing numbers.</p> <p>Site promoters may opt to not forward fund design codes / masterplans for their sites, which could impact on TMBC budgets.</p> <p>Specialist design advice not available.</p>

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							Risk No. 22 and 27
11(d)	Inclusion of wording to clarify that the relevant policies are those relating to the supply of land including overall	No direct implication for plan-making. However, a helpful clarification for planning	The Council is progressing a local plan and once adopted the risk of adhoc developments coming forward	N/A	N/A	To continue to progress plan-making and submit/adopt a plan at the earliest opportunity.	N/A

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	requirement, allocations and/or windfall allowances when considering the presumption in favour of sustainable development for decision-taking.	application decision-making.	under the presumption in favour of sustainable development will be reduced.				
11(dii)	In considering whether adverse impacts outweigh benefits in applying the presumption in favour of sustainable development,	No direct implication for plan-making. However, a helpful clarification for planning application decision-	N/A	N/A	N/A	N/A	N/A

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	emphasis is provided on considering design, location and affordable housing provision to ensure high standards of 'all' development.	making to ensure high-quality development.					
76 & 78	Amendments to how 5-year housing land supply is considered, requiring all LPAs, regardless of local plan status (even when a plan is less than five	There will be a continual need to identify a 5-year housing land supply.  It will be important for the local plan to allocate sufficient sites	Two 'call for sites' rounds for the emerging plan have been undertaken so far to inform the Land Availability Assessment (LAA). This provides the evidence to	Undertake a further call for sites as part of the Regulation 18 consultation or sooner (if appropriate) and progress the LAA evidence base taking into	The LAA is a fundamental and substantial work area that is undertaken in house. There will be a staff resource implication on updating and progressing the	Yes – further work on the LAA will be required to address the revised NPPF and obtaining the necessary evidence in which to inform the	A risk should staff leave, fall ill etc on delivering the LAA.  Delay to obtaining the evidence base which

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	<p>years old), to continually demonstrate 5-years of specific, deliverable sites for housing.</p> <p>Deletion of the ability to count oversupply against upcoming supply in 5-year housing land supply calculations.</p>	<p>to meet housing need and provide an appropriate buffer to protect the Council's 5-year housing land supply position on an annual basis to ensure a planned approach, alongside ensuring and responding to changes in housing delivery.</p>	<p>understand the suitability and deliverability of sites taking into account national policy and constraints and will allow the future housing supply position to be understood through supporting the provision of a local plan housing trajectory.</p>	<p>account a revised NPPF and the Council's evidence base. This work will feed into spatial strategy option testing and understanding housing supply. Work specifically around the 5-year housing supply will also be required.</p> <p>Considering monitoring practices.</p>	<p>LAA. There will also be costs associated with obtaining evidence to inform the LAA / plan-making process as identified in this table.</p>	<p>assessment of sites submitted to the LAA.</p>	<p>will inform the LAA.</p> <p><b>Risk No. 8 and 27.</b></p>



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75 & 77	<p>The 10% buffer for 'annual position statements' has been deleted.</p> <p>The requirement for a 5% buffer has been added.</p> <p>The requirement for a 20% buffer on top of the 5-</p>	<p>Given TMBC's 5-year housing land supply position<sup>1</sup>, the local plan will need to account for a 20% buffer in the first five years to be added to the overall housing supply. Using the new</p>	<p>The Regulation 18 Local Plan made a commitment to meeting need.</p>	<p>Evidence around the degree to which it is possible to meet higher development needs will be required. See chapter 4 row below.</p>	<p>No – work undertaken in-house. Costs associated with evidence base gathering as per comments under chapter 4 below.</p>	<p>Yes – See chapter 4 comments below.</p>	<p>Risks around the soundness of the plan, should development needs (including a 20% buffer) not be met or cannot be met by other LPAs via</p>

<sup>1</sup> Based upon the housing need of 839 dpa plus a 20% buffer, the Council is able to demonstrate 4.36 years of housing land supply between 1 April 2023 and 31 March 2028 as at 31 December 2023. This does not account for any increase in housing need requirements as per the revised NPPF.

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	<p>year housing land supply figure for LPAs that have scored below 85% in the housing delivery test (HDT) is also added.</p> <p>The reduced requirement to demonstrate a 4YHLS for plans that had been submitted or reached Reg 18 or 19 has also been deleted, restoring consistency of requiring a 5-year housing land supply for LPAs regardless of plan progress.</p>	<p>standard method calculation this amounts to 212 additional dwellings per annum or a total of 1,060 additional dwellings in the first five years.</p>					<p>Duty to Cooperate discussions / agreements.</p> <p><b>Risk No. 11</b></p>

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24 & 27	<p>Amendments to ensure effective cooperation and greater collaboration between authorities on strategic cross boundary issues.</p> <p>Amendments providing that strategic policy-making authorities and Inspectors will</p>	<p>The Duty to Cooperate will continue to apply but with a greater emphasis on strategic planning and there will be a requirement to continue progressing Statements of Common Grounds to demonstrate</p>	<p>Duty to Cooperate discussions and work progressing an Infrastructure Delivery Plan is ongoing.</p>	<p>Given that housing supply requirements for most West Kent Authorities will increase and the emphasis on strategic planning, it may be prudent to take forward a collaborative approach between West Kent authorities</p>	N/A	<p>Yes – to aid further engagement to ensure effective cooperation.</p>	<p>Duty to Cooperate discussions fail or cause plan production delay.</p> <p><b>Risk No. 11 and 39</b></p>

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	<p>need to make an informed decision on the basis of available information where plans come forward at different times or where there is uncertainty from infrastructure providers.</p>	<p>this. Policy consistency will be required between other strategic LPAs and other relevant bodies.</p> <p>Decisions to be made on available information may have implications when considering key matters such as meeting housing need, unmet need from other LPAs and / or infrastructure delivery certainty.</p>		<p>on strategic matters.</p>			

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Chapter 4 – A new Standard Method for assessing housing need							
N/A – see chapter 4 of consultation document	New standard method proposed for assessing local housing need where LPAs must make all efforts to allocate land in line with it including optimising density, sharing need with neighbouring authorities and reviewing Green Belt boundaries.	Applying the new standard method will result in an increased housing need from 820 to 1057, a 237 dwellings per year increase from the previous standard method. The new standard method will also	Updating the strategic housing market assessment and need evidence base and Green Belt evidence is already noted within the Local Plan work programme.	Given the amount of housing need required for Tonbridge and Malling Borough, alongside likely unmet need from adjacent LPAs, a range of evidence will be required to demonstrate whether it is possible to	Yes – associated with providing evidence bases and updating the Sustainability Appraisal.	Yes – to obtain the required evidence and consider the suitability of sites using a revised NPPF, emerging evidence and densities to understand whether overall housing need can be met.	Delay to obtaining the required evidence base which will help inform whether it is possible to meet needs and identify a deliverable spatial strategy.

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		<p>increase housing need in adjacent authorities. This could lead to an increase in unmet need requests from other LPAs and / or an uplift in the amount of unmet need likely to be requested.</p> <p>Going forward, we will need to deliver a higher housing target and test whether this is deliverable or ensure that robust evidence exists to demonstrate that land cannot be brought forward due to constraints.</p>		<p>meet our needs / unmet need from elsewhere.</p> <p>This will be undertaken via the LAA, evidence bases to understand constraints (such as a Green Belt review or landscape sensitivity assessments etc), an updated housing / economy evidence base and spatial option testing and density work.</p>			<p>Risks around the soundness of the plan, should development needs not be met or cannot be met by other LPAs via Duty to Cooperate discussions / agreements.</p> <p><b>Risk No. 27 and 11</b></p>

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Chapter 5 Brownfield, grey belt and the Green Belt							
124c	Addition of wording in the NPPF to reinforce the expectation that development proposals on brownfield land / Previously Developed Land (PDL) are viewed positively and 'should be regarded as acceptable in principle'.	None – The current NPPF already promotes utilising brownfield land.	The LAA provides information on available brownfield land.	Provide an update to the Brownfield Register.	N/A	N/A	N/A

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154g	In relation to proposals affecting the Green Belt, amendments relax the restrictions that are currently applied to PDL and limited infilling in the Green Belt, to make clear that development is 'not inappropriate' where it would not cause substantial harm	The amendment provides a change in how restrictions to development are applied.	Certain Green Belt work has / is being progressed.	A change in how restrictions are applied will need to be considered in both current and future Green Belt work.	Yes – revising emerging evidence base alongside a Green Belt review.	Yes – to update evidence base and undertake a Green Belt review.	Delay to obtaining the evidence base which will inform the LAA and the overall spatial strategy.  <b>Risk No. 27</b>



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	to the openness of the Green Belt.						
145	Wording amended / added requiring LPAs to undertake a Green Belt review where exceptional circumstances are evidenced / justified. This includes instances where an authority cannot meet its identified needs through other means unless this would fundamentally undermine the function of the	Currently there is no requirement to review Green Belt. Should TMBC not be able to meet its housing need on land outside the Green Belt, then a Green Belt review will be required.	Certain Green Belt work has / is being progressed.	Given limited opportunity to meet needs outside the Green Belt, a full Green Belt review will be required.	Yes – Consultancy costs to undertake a full Green Belt Review, building on work already undertaken / being progressed.	Yes – It is stipulated that Green Belt review should be undertaken through the preparation of plans. This will be a critical piece of work that will feed into the Local plan spatial strategy.	<p>Delay to obtaining the evidence base which will inform the LAA.</p> <p>Delay to Guidance being published by the Government which will inform Green Belt work.</p> <p><b>Risk No. 27 and 32</b></p>

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	Green Belt across the plan area as a whole.						
147	Provision of a sequential approach to guide Green Belt release towards urban areas, towns and villages within the Green Belt or towards locations beyond the outer Green Belt boundary is proposed where consideration should first be directed to PDL in sustainable locations, then towards grey belt land in sustainable	The term 'grey belt' <sup>2</sup> is defined in the revised NPPF. This addition provides a new approach to releasing land in the Green Belt that will need to be addressed through both plan-making and decision-making.	Certain Green Belt work has / is being progressed.	To understand Government guidance in relation to judging whether land makes a limited contribution to the Green Belt purposes.  A Green Belt review and further work to consider the sequential approach.	Yes – Consultancy costs to undertake a full Green Belt Review, building on work already undertaken / being progressed.	Yes – It is stipulated that Green Belt review should be undertaken through the preparation of plans. This will be a critical piece of work that will feed into the Local plan spatial strategy.	Delay to obtaining the evidence base which will inform the LAA.  Delay to Guidance being published by the Government which will inform Green Belt work.  <b>Risk No. 27 and 32</b>

<sup>2</sup> • Grey belt: For the purposes of Plan-making and decision-making, grey belt is defined as land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).

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	locations and only then to consider other sustainable Green Belt locations.						
152	New paragraph proposed to support the release of grey belt land outside of the plan-making process where a 5-year housing land supply cannot be demonstrated or where a LPA falls below the 75% HDT threshold or where there is unmet commercial or other need.	No implications for plan-making, however, TMBC is without a 5-year housing land supply and this change is likely to result in applications coming forward outside the plan-making process.	Certain Green Belt work has / is being progressed.	Sites coming forward outside the plan-making process will need to be considered as part of the Council's overall housing supply work.	N/A	N/A	N/A

NPPF Paragraph	Change	Implications for Local Plan	Current Local Plan Commitments	Further work required	Additional cost	LP Timetable implication	Main Risks – see Annex 5
155 & 156	New paragraph introducing 'golden rules' that will apply to development management decisions that relate to both land released from the Green Belt and also developments permitted through development management. The 'golden rules' require housing schemes to deliver at least 50% affordable housing, subject to viability, infrastructure improvements and provision of accessible green space that meets local or Natural	N/A	N/A	N/A	N/A	N/A	N/A

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	England standards.						
157 & Annex 4	Provides that additional guidance for viability in relation to Green Belt release is provided in Annex 4 setting out guidance on benchmark land values, that planning permission should not be granted if policy compliant development cannot be delivered and advice on viability assessments.	No direct impact – however ‘golden rule’ requirements and benchmark land values being set at too low a level could result in developers holding back land which could affect the Council’s housing land supply position.	Viability assessments for plan policies are already part of the Local Plan work programme at its various Reg 18 and Reg 19 stages.	Further work will be required to consider a revised NPPF in relation to the viability of sites in the Green Belt.	Yes – to update work already undertaken.	No	N/A

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Chapter 6 Delivering affordable, well-designed homes and places							
63 & 64	<p>Expectation set for housing need assessments to explicitly consider the needs of those requiring Social Rent and for LPAs to specify their expectations on the minimum proportion of Social Rent homes required as part of their affordable housing policies.</p> <p>Also addition of reference to consider and reflect in planning policies the needs of 'looked after children'</p>	Planning policies to specify minimum proportion of Social Rent homes.	An updated Strategic Housing Market Needs Assessment forms part of the local plan work programme.	To consider evidence and progress a policy to include Social Rent minimum requirements.	N/A	Evidence required to inform draft policy.	<p>Delay to obtaining the evidence base which will inform the LAA.</p> <p><b>Risk No. 27</b></p>

NPPF Paragraph	Change	Implications for Local Plan	Current Local Plan Commitments	Further work required	Additional cost	LP Timetable implication	Main Risks – see Annex 5
6 & 66	Removal of requirements relating to percentages required for affordable home ownership tenures and 25% of affordable housing units to be First homes.	It will be necessary for TMBC to identify the right balance for the delivery of affordable home products in accordance with the needs of the community and as supported by evidence.	An updated Strategic Housing Market Needs Assessment forms part of the local plan work programme.	To progress and consider evidence to inform Local plan policies.	N/A	Evidence required to inform affordable housing requirements.	Delay to obtaining the evidence base which will inform the LAA.  <b>Risk No. 27</b>

NPPF Paragraph	Change	Implications for Local Plan	Current Local Plan Commitments	Further work required	Additional cost	LP Timetable implication	Main Risks – see Annex 5
69	New paragraph promoting the delivery of mixed tenure sites to support the creation of diverse communities alongside the timely build out of sites and setting out that LPAs should support these through policies and decisions <sup>3</sup> .	To progress policies to support mixed tenure sites, as supported by evidence.	An updated Strategic Housing Market Needs Assessment forms part of the local plan work programme.	To progress and consider evidence to inform Local plan policies.	N/A	Evidence required to inform and advise on policy direction.	Delay to obtaining the evidence base which will inform the LAA.  <b>Risk No. 27</b>
Chapter 7 Building infrastructure to grow the economy							

<sup>3</sup> Mixed tenure sites can include mixture of ownership and rental tenures, including rented affordable housing and build to rent, as well as housing designed for specific groups such as student accommodation or older people's housing, and plots for self or custom build.



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86b, 87b and 87c	<p>Provides a number of updates focussed on additional industries and uses where planning policies are required to identify sites to meet the needs of the modern economy. Laboratories, gigafactories, digital infrastructure including data centres, freight and logistics are highlighted.</p> <p>There is a new requirement to make provision for the “expansion or modernisation of other industries of local, regional or national importance to support</p>	The policy updates will need to be accounted for within the Economic Needs evidence base as this progresses and addressed through planning policy as relevant.	An Economic Development Needs Study has been progressed to help inform emerging policy.	An update / addendum to the Economy evidence base will be required to specifically consider the NPPF revisions.	Yes	Evidence required to inform and advise on policy direction.	<p>Delay to obtaining the evidence base which will inform the LAA.</p> <p><b>Risk No. 27</b></p>

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	<p>economic growth and resilience”.</p> <p>Also a requirement to ensure that supply chains, transport innovation and decarbonisation are considered in terms of locational requirements of the storage and distribution sectors.</p>						
Chapter 8 – Delivering community needs							

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99	Additions to include early years and post year school places in relation to meeting education choices.	None – this is already accounted for as part of plan-making.	An Infrastructure Delivery Plan (IDP) will be prepared to support each local plan consultation / submission stage.	On-going liaison with Kent County Council.	N/A	N/A	N/A
100	Addition to make clear that significant weight	None – this is already accounted for	An Infrastructure Delivery Plan (IDP) will be	On-going liaison with	N/A	N/A	N/A

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	should be placed on the importance of facilitating new, expanded, or upgraded public service infrastructure when considering proposals for development.	as part of plan-making.	prepared to support each local plan consultation / submission stage.	Kent County Council.			
114	Reference made to a vision-led approach for transport planning to promote	None – the approach to transport planning is already accounted for	An Infrastructure Delivery Plan (IDP) will be prepared to support each local	On-going liaison with Kent County Council.	N/A	N/A	N/A

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	sustainable transport modes, taking account of the type and location of development proposed.	as part of plan-making.	plan consultation / submission stage.				
115	Update requiring cumulative impacts on the road network to be severe 'in all tested scenarios' for a planning refusal on	None – the approach to transport planning and highways capacity is already accounted for	An Infrastructure Delivery Plan (IDP) will be prepared to support each local plan consultation / submission stage.	On-going liaison with Kent County Council to understand outputs and implications of	N/A	N/A	N/A

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	highways grounds.	as part of plan-making.		transport modelling.			
<b>Chapter 9 Supporting green energy and the environment</b>							
160	Amendment strengthening the requirement to consider renewable and low carbon energy and heat setting out that	Previous requirement was to 'consider identifying such areas'. The revision now requires LPAs	Work has been undertaken to gain Local Plan Climate Change Policy Support to help inform and provide evidence for local plan policies.	It will be necessary to progress both a landscape capacity study for renewables alongside a renewable	Yes	Yes – time required to obtain the evidence bases.	Delay to obtaining the evidence base which will inform the LAA.  <b>Risk No. 27</b>

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	plans should identify suitable areas to deliver such development and associated infrastructure, where this would help secure their development.	to consider and identify suitable areas for renewables / low carbon and heat developments.		energy assessment to help identify areas of land that may be suitable for wind / solar energy generation.			
163	Removal of text 'in determining planning applications' which will require both plan-making and when determining applications to give significant	To review and revise emerging policy in line with the Council's evidence base on this topic.	Work has been undertaken to gain Local Plan Climate Change Policy Support to help inform and provide evidence for local plan policies.	N/A	N/A	N/A	N/A

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	weight to support energy efficiency and low carbon heating improvements to existing buildings.						
Footnote 64	Removal of footnote that made the availability of agricultural land for food production an explicit consideration in determining if sites are	None	The best and most versatile agricultural land is considered as part of plan-making.	N/A	N/A	N/A	N/A



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	appropriate for development.						