

Options Appraisal – A Monmouthshire Perspective

This appraisal uses a traffic light system (red, amber & green) to show the level of impact that each of the 6 'options' has on the planning outcomes listed in the left hand column.

NOTE: Monmouthshire County Council Officers support the preparation of a Strategic Development Plan (SDP) to provide a regional spatial framework for the future development and use of land. However, this appraisal considers the risks associated with the various options for plan revision as set out below.

RED: High impact




AMBER: Medium impact



GREEN: No or minimal impact


PLANNING OUTCOMES	OPTION 1 Monmouthshire LDP Revision, do not progress with SDP	OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs	OPTION 3 Monmouthshire LDP Revision & preparation of SDP	OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP	OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP	OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP
Continuous Plan coverage	●	●	●	●	●	●
Housing Delivery	●	●	●	●	●	●
Affordable Housing Delivery	●	●	●	●	●	●
S106 Contributions/CIL	●	●	●	●	●	●
Dealing with strategic Infrastructure issues	●	●	●	●	●	●
Dealing effectively with cross- boundary issues	●	●	●	●	●	●
Impact on a future SDP	●	●	●	●	●	●
Preparing a sound evidence base	●	●	●	●	●	●
Spatial coherence	●	●	●	●	●	●
Planning certainty & investor confidence	●	●	●	●	●	●

The most 'high impact risks' are associated with options 4 & 6.




PLANNING OUTCOME: CONTINUOUS PLAN COVERAGE


OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> • The Revised Monmouthshire LDP will be adopted early 2022 providing up-to-date policy coverage to guide sustainable development. • Monmouthshire County Council (MCC) has the budget & resources to undertake revision of its LDP. • Monmouthshire has the capacity, capability and resilience necessary to deliver a revised LDP in 4 years. • Opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base, remove duplication and waste, share data and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same planning outcomes. • No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region (contrary to provisions of the Planning Act in relation to 3 tier plans) • Resources could be focussed on LDP preparation if there was no involvement in SDP preparation. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> • Monmouthshire County Council Officers support the preparation of a SDP. However, the absence of a revised LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. • A relaxation of the adopted LDP's end-date (which is also being presented as a solution to avoiding a potential policy vacuum by LPAs in the region) beyond 2021 would not provide a temporary solution for Monmouthshire until such time as a SDP is adopted. While there have been limited completions, the majority of the strategic housing sites within the Monmouthshire's LDP now have planning permission, there is subsequently a need to produce a new plan as soon as possible to ensure there are sufficient housing and employment opportunities in order to enable housing delivery. In addition to this a new plan is required to address aspirations/opportunities associated with City Deal, Future Monmouthshire and the removal of the Severn Bridge tolls. • The SDP will enable a proper regional spatial planning framework for the South East Wales region (in accordance with the provisions of the Planning Act 3 tier plans). 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> • The Revised Monmouthshire LDP will be adopted early 2022 providing up-to-date policy coverage. In the event the SDP is delayed, up-to-date development plan coverage would be in place to guide sustainable development. • Monmouthshire County Council has the budget & resources to undertake revision of its LDP. • Monmouthshire has the capacity, capability and resilience necessary to deliver a revised LDP in 4 years. • The Planning Policy Team is committed to meeting the challenge of preparing a revised LDP and being involved in the preparation of a SDP for South East Wales followed by a 'Light Touch' LDP. The provision of an additional fixed term post will assist in this process. • Opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base, remove duplication and waste, share data and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by 	



	<p>the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same planning outcomes.</p> <ul style="list-style-type: none"> • The SDP will enable a proper regional spatial planning framework for the South East Wales region (in accordance with the provisions of the Planning Act 3 tier plans). • Enable full consideration of the Council’s aspirations associated with Future Monmouthshire and City Deal and to address opportunities associated with the removal of the Severn Bridge tolls. Would also enable these considerations be fed into the SDP process. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> • The practicalities and potentially lengthy timescales involved in setting up and preparing such a large LDP is cause for concern given the LDP expiry date deadline. The proposed footprint provides neither proper regional planning on a CCR footprint nor a proper local plan that our communities can engage with and take ownership of. • There are significant concerns regarding the time and effort it would take to set up and run joint working arrangements (governance and culture, positive Member and Officer relationships, joint teams etc.) this would undoubtedly delay plan preparation. • It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan) • Delays associated with establishing joint working arrangements would also act as a distraction from preparation of a SDP. • In view of the concerns raised above it is extremely unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’. • The Joint LDP would have to be adopted by each and every constituent full Council, if one Council doesn’t adopt the Joint LDP, none of the authorities would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerable risk. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • A Joint LDP will likely result in a policy vacuum as noted above. In theory the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint Plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements. • It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan) • Delays associated with establishing joint working arrangements would also act as a distraction from preparation of a SDP. • In view of the concerns raised above it is unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’. 	

	<ul style="list-style-type: none"> • The Joint LDP would have to be adopted by both constituent full Councils, if one Council doesn't adopt the Joint LDP, neither authority would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerable risk. 	
<p>OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP</p>	<ul style="list-style-type: none"> • The practicalities and potentially lengthy timescales involved in setting up and preparing such a large LDP is cause for concern given the LDP expiry date deadline. The proposed footprint provides neither proper regional planning on a CCR footprint nor a proper local plan that our communities can engage with and take ownership of. • There are significant concerns regarding the time and effort it would take to set up and run joint working arrangements (governance and culture, positive Member and Officer relationships, joint teams etc.) this would undoubtedly delay plan preparation. • It is acknowledged that there could be cost savings from Joint LDPs but could be achieved with shared evidence etc. (without working on a Joint plan) • In view of the concerns raised above it is extremely unlikely that a Joint LDP on the footprint proposed could be adopted by 2021 therefore undermining full plan coverage, subsequently resulting in a policy vacuum for Monmouthshire, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'. • The Joint LDP would have to be adopted by each and every constituent full Council, if one Council doesn't adopt the Joint LDP, none of the authorities would have a LDP resulting in a protracted policy vacuum. This option therefore presents considerably risk. • The Joint Plan on the proposed 4 Council footprint would relate to a sub-regional rather than local plan. • No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region (contrary to provisions of the Planning Act in relation to 3 tier plans) • Resources could be focussed on LDP preparation if there was no involvement in SDP preparation. 	

PLANNING OUTCOME: Housing Delivery





OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> • The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework and allocated sites which will facilitate a coordinated approach to housing delivery and associated infrastructure, however, this will have limited strategic focus without the links to the SDP. • A direction of travel will be provided at the Preferred Strategy stage (end of 2019/early 2020) which would guide development to preferred sustainable locations and address affordability issues in the short to medium term. • Provides an opportunity to realise MCC aspirations for future growth in the short term, however, consideration of a different strategy such as a new settlement would have limited support without links to the SDP. As a result this could hinder meeting the aims of affordability, rebalancing demography and sustaining rural communities/the County as a whole over the longer term. • There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> • The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery. • There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. • MCC aspirations for future growth may not be realised in the short term which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole. • Would provide an opportunity to consider the potential for a new settlement in Monmouthshire. • The SDP will provide proper regional spatial planning framework for strategic housing delivery in the region. • Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the SDP is adopted. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> • The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to housing delivery and associated infrastructure. A direction of travel will be provided at the Preferred Strategy stage (end of 2019/early 2020) which would guide development to preferred sustainable locations. • Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP, providing an opportunity to feed directly into the SDP process and identify any strategic opportunities. 	



	<ul style="list-style-type: none"> • Provides an opportunity to realise MCC aspirations for future growth both in the short term and long term which would have a positive effect on affordability and assist in rebalancing demography while sustaining rural communities/the County as a whole. • This would properly enable the County's housing delivery issues to be considered and to have full regard to aspirations/opportunities associated with the Cardiff Capital Region City Deal and Tolls removal • There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP. Would achieve better planning outcomes in a more timely manner through an individual Plan aligned to MCC's aspirations. • Future growth areas that cross administrative boundaries could still be managed effectively in the interests of the region until the SDP is adopted via collaborative working, aligned policies/allocations and joint SPG. • The SDP will enable a proper regional spatial planning framework for the South East Wales region. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> • Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'. • Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted. • It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces, a SDP would however do this though. • There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to the other authorities within the proposed footprint. • MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole. • A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire's aspirations if growth is directed to Newport or southern Torfaen. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with a Joint plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'. 	

	<ul style="list-style-type: none"> • Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted. • It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces, a SDP would however do this though. • There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to Torfaen. • MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole. • A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire’s aspirations if growth is directed southern Torfaen. A Joint LDP will likely result in a policy vacuum as noted in option 4, however, in theory the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements. • A Joint LDP may be beneficial in terms of cross-boundary growth, provided this does not quash Monmouthshire’s aspirations, or, affect the ability to sustain Monmouthshire’s communities and improve affordability. 	
<p>OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP</p>	<ul style="list-style-type: none"> • Housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. This will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations and the potential situation of ‘Planning by Appeal’. • Monmouthshire would have a lack of a 5 year housing land supply for a prolonged period of time (key Welsh Government requirement) until the Joint LDP is adopted. • It is accepted that a Joint LDP on this footprint would provide a framework for housing delivery in the longer term, however, such an approach would not deliver a proper regional approach to tackle the issues the Cardiff Capital Region faces. • There is significant pressure in Monmouthshire for housing development, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. Development may be directed to the other authorities within the proposed footprint. • MCC aspirations for future growth may not be realised which would impact on affordability and with the aims to rebalance demography and sustain rural communities/the County as a whole. 	







	<ul style="list-style-type: none">• A Joint LDP on this footprint would, as a wider area, have a more balanced demography and affordability, but this would still be contained in pockets of extremes. A joint Plan would not address those challenges. It could adversely affect Monmouthshire's aspirations if growth is directed to Newport or southern Torfaen.• No progress with the SDP would result in a lack of a proper regional spatial planning framework across the South East Wales region to address strategic housing delivery.• The opportunity to progress a different strategy could have limited support without links to the SDP and would be best addressed through the SDP process.	
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PLANNING OUTCOME: Affordable Housing Delivery

OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to affordable housing delivery. Provides an opportunity to realise MCC aspirations for future growth in the short term, however, the ability to consider other strategic options for addressing housing need such as a new settlement would have limited support without links to the SDP. As a result this could hinder longer term affordability within Monmouthshire. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. This would likely result in an uncoordinated approach to affordable housing delivery in Monmouthshire (in the short to medium term) compromising Welsh Government's objectives to deliver an additional 20,000 affordable homes. Monmouthshire has the highest average house prices in Wales. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on affordability. MCC aspirations for future growth may not be realised in the short term which would impact further on affordability and the widening gap. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> The Revised Monmouthshire LDP will be adopted early 2022 providing an up-to-date policy framework which will facilitate a coordinated approach to affordable housing delivery to support the County as a whole. Provides an opportunity to realise MCC aspirations for future growth both in the short term and long term linked to Cardiff Capital Region City Deal, Future Monmouthshire and removal of the Severn Bridge Tolls (potential for a new settlement) which would have a positive effect on affordability. The SDP will provide proper regional spatial planning framework for strategic housing delivery in the region. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to the other authorities within the proposed footprint. 	







	<ul style="list-style-type: none"> • MCC aspirations for future growth may not be realised which would impact further on affordability. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with a Joint plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. • There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to Torfaen. MCC aspirations for future growth may not be realised which would impact further on affordability. • A Joint LDP will likely result in a policy vacuum as noted above in bullet point one, however, the time taken to establish governance and working practices would be reduced by virtue of having only one partner however, it remains highly unlikely that a Joint plan on a smaller footprint would be adopted by 2021 given issues associated with establishment and running of joint working arrangements. 	
<p>OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP</p>	<ul style="list-style-type: none"> • Affordable housing delivery in the short to medium term is likely to be compromised because of the lengthy plan preparation time associated with such a plan. The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. The ability to secure S106 contributions for affordable housing without the relevant policy hooks or supplementary planning guidance is of particular concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. • There is a significant affordable housing need in Monmouthshire, the County has the highest average house prices in Wales and traditionally constrained growth. Welsh Government policy to maximise take up of brownfield land may limit growth further within Monmouthshire due to lack of brownfield opportunities which would further impact on the delivery of affordable housing. Development may be directed to the other authorities within the proposed footprint. • MCC aspirations for future growth may not be realised which would impact further on affordability. 	

PLANNING OUTCOME: Planning contributions







OPTIONS	COMMENTARY	RISK
OPTION 1 Monmouthshire LDP Revision, do not progress with SDP	<ul style="list-style-type: none"> Since adoption of the LDP, Monmouthshire has secured approximately £3.8million in financial contributions. An up to date revised LDP based on sound viability evidence would ensure a continued coordinated approach to securing financial contributions. 	
OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs	<ul style="list-style-type: none"> The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. 	
OPTION 3 Monmouthshire LDP Revision & preparation of SDP	<ul style="list-style-type: none"> Since adoption of the LDP, Monmouthshire has secured approximately £3.8million in financial contributions. An up to date revised LDP based on sound viability evidence would ensure a continued coordinated approach to securing financial contributions. 	
OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP	<ul style="list-style-type: none"> The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. Monmouthshire has put CIL on hold pending conclusion of UK wide reforms. Newport has progressed CIL through examination but has chosen to delay adoption. Torfaen proposes to adopt CIL as part of its LDP revision. Blaenau Gwent has decided to not progress CIL due to viability in its area. CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach. 	
OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP	<ul style="list-style-type: none"> The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge. Monmouthshire has put CIL on hold pending conclusion of UK wide reforms. Torfaen proposes to adopt CIL as part of its LDP revision CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach. 	
OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP	<ul style="list-style-type: none"> The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. The ability to secure S106 contributions towards essential infrastructure and affordable housing without the relevant policy hooks or supplementary planning guidance is of significant concern. A relaxation of the adopted LDP end date would not 	

	<p>be an acceptable solution because the viability evidence that underpins the existing LDP would be considered out of date and subsequently subject to challenge.</p> <ul style="list-style-type: none">• Newport has progressed CIL through examination but has chosen to delay adoption. Torfaen proposes to adopt CIL as part of its LDP revision. Blaenau Gwent has decided to not progress CIL due to viability in its area. CIL would need to be reviewed on the Joint LDP footprint to ensure a consistent viability approach.	
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PLANNING OUTCOME: Effective Management of Strategic Infrastructure Issues


OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> • Since adoption the LDP has contributed to significant levels of new infrastructure. The revision of the LDP will continue to provide the basis for the delivery of infrastructure in the short and medium term maintaining a sustainable approach to spatial planning. However, long term this will have limited strategic impact without the links to the SDP. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> • The SDP will provide the mechanism for consensus to be reached on strategic and cross boundary infrastructure issues in the longer term. However, in the absence of a revised LDP and resultant policy vacuum (until adoption of the SDP) it would be a significant challenge to guide new development and its associated infrastructure to preferred sustainable locations, which could prejudice a future SDP Strategy. • A SDP would enable a regional approach to strategic infrastructure but without a LDP or SDP in place there would not be appropriate policy hooks in place to secure contributions. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> • Since adoption the LDP has contributed to significant levels of new infrastructure. The revision of the LDP will continue to provide the basis for the delivery of infrastructure in the short and medium term maintaining a sustainable approach to spatial planning. • Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP thus ensuring that the respective strategies align and that strategic cross boundary infrastructure issues are identified in addition to the mechanism for dealing with them effectively. • The SDP would need to agree a mechanism for funding for strategic infrastructure. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> • A Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a sub-regional basis. However, the need for such a large Joint LDP area is considered unnecessary because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long term. • A SDP would enable a regional approach to strategic infrastructure but during the period without a LDP or SDP is in place there would not be appropriate policy hooks in place to secure contributions. • The SDP would need to agree a mechanism for funding for strategic infrastructure. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • A Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a larger than local footprint. However, the need for such a Joint LDP area is questioned because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long term. • A SDP would enable a regional approach to strategic infrastructure but during the period without a LDP or SDP is in place there would not be appropriate policy hooks in place to secure contributions. • The SDP would need to agree a mechanism for funding for strategic infrastructure. 	
<p>OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP</p>	<ul style="list-style-type: none"> • In the absence of a SDP a Joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a sub-regional basis. However, the SDP is required to provide the mechanism for consensus to be reached on significant and cross boundary issues in the long-term. 	

PLANNING OUTCOME: Dealing effectively with cross-boundary issues






OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> It is considered that potential growth areas that cross administrative boundaries (similar to the existing LDP employment allocations at Gwent Europark and Mamhilad) could be identified in respective LDPs in addition to the mechanisms required to manage them effectively. This would ensure that a coordinated approach to spatial planning is maintained in the absence of a SDP. However, longer term this will have limited scope without the links to the SDP. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> It is accepted that the SDP will provide the framework for dealing with cross-boundary issues in the longer term. However the absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> It is considered that potential growth areas that cross administrative boundaries (similar to the existing LDP employment allocations at Gwent Europark and Mamhilad) could be identified in respective LDPs in addition to the mechanisms required to manage them effectively. This would ensure that a coordinated approach to spatial planning is maintained (as an interim measure) until the SDP is adopted. The revised LDP would be consistent with the direction of travel identified in the National Development Framework and early on in the SDP process. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen and Glan Llyn in Newport. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP. The SDP will provide proper regional spatial planning framework to address cross-boundary issues. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP. The SDP will provide proper regional spatial planning framework to address cross-boundary issues. 	
<p>OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP</p>	<ul style="list-style-type: none"> It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary such as developments close to Monmouthshire at Mamhilad in Torfaen and Glan Llyn in Newport. However, in reality any potential growth areas could be successfully achieved collaboratively without the need for a Joint LDP. However, longer term this will have limited scope without the links to the SDP and the wider Cardiff Capital Region footprint. 	

PLANNING OUTCOME: Impact on a future Strategic Development Plan

OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> • While the LPA would be able to realise MCC aspirations for future growth in the short term, the ability to progress a different strategy for example potentially a new settlement would have limited support without links to the SDP. • There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies, however, without links to a SDP an independent LDP could result in misalignment with the overall Cardiff Capital Region. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> • The absence of a revised LDP will result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the SDP is adopted. As a consequence it would be difficult to guide new development and its associated infrastructure to preferred sustainable locations. • This option would see the region's resources focussed on delivering a SDP and subsequent light touch LDPs would all reflect the SDP strategy. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> • Officers would at the same time be working on the revised LDP and collaboratively with the region to prepare a SDP thus ensuring coherence and a regional approach. This would ensure that the revised Monmouthshire LDP does not prejudice or compromise a future SDP strategy whilst at the same time maintaining up-to-date LDP coverage. • A delay in progress of the SDP would result in a risk that the LDP would not align with the SDP strategy. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> • There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy. • It is accepted that this option in the long term would ensure coherence on a sub-regional basis, however, with the region committed to preparation of a SDP the option to progress such a large Joint LDP is considered unnecessary and will not achieve better planning outcomes compared to option 3 in the short to medium term. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy. • It is accepted that this option in the longer term would enable coherence on a larger than local basis, however, with the region committed to preparation of a SDP the option to progress such a Joint LDP area is considered unnecessary and will not achieve better planning outcomes compared to option 3 in the short to medium term. 	
<p>OPTION 6</p>	<ul style="list-style-type: none"> • There is concern that the lengthy preparation time associated with a Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) and associated negative planning outcomes until the Joint LDP is adopted. In particular, the absence of a revised LDP would result in significant 	

Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP	<p>pressure to release greenfield sites in unsustainable locations for speculative development potentially compromising a future SDP strategy.</p> <ul style="list-style-type: none">• In the absence of a SDP there would be no proper regional spatial planning framework to guide future development in the South East Wales region.• It is accepted that this option in the long term would enable coherence on a sub-regional basis, however, with the rest of the Cardiff Capital Region committed to preparation of a SDP it would be irrational to progress the option of such a large Joint LDP.	
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PLANNING OUTCOME: Preparing a sound evidence base

OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> • The cost of an individual revised LDP is anticipated to be significantly lower than the existing adopted LDP, given a requirement to update much of the original evidence base and focus on collaboration with other LPA's on a joint evidence base (as far as practicably possible). • There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP. • The SDP provides the proper basis for regional spatial planning and provides the platform for preparing a coordinated planning framework for the region to inform LDPs. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> • The majority of the existing LDP evidence base will be out of date and subject to challenge. Until the SDP is adopted, the absence of a revised LDP and lack of an up to date evidence base would result in a policy vacuum, absence of allocated sites and protected designations and associated negative planning outcomes, including risks associated with outdated viability evidence and significant pressure for speculative development in undesirable locations. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> • The cost of an individual revised LDP is anticipated to be significantly lower than the existing adopted LDP, given a requirement to update much of the original evidence base and focus on collaboration with other LPA's on a joint evidence base (as far as practicably possible). • There would be an opportunity to collaborate with adjacent local planning authorities to ensure a consistent evidence base and utilise common methodologies. This would provide in-built flexibility for the LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by the adjacent local planning authorities. The risks associated with a policy vacuum would be substantially reduced compared to preparing a Joint LDP. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> • Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated. • It could be argued that this expenditure would be better spent on the preparation of a regional SDP evidence base. 	
<p>OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP</p>	<ul style="list-style-type: none"> • Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated. • It could be argued that this expenditure would be better spent on the preparation of a regional SDP evidence base. 	







OPTION 6

Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP





- Such a Joint LDP would require the preparation of an entirely new evidence base to reflect that the footprint of the Joint LDP area which would be one spatial planning area. It is unlikely that existing evidence could be updated and disaggregated.
- The SDP provides the proper basis for regional spatial planning and provides the platform for preparing a coordinated planning framework for the region to inform LDPs.



PLANNING OUTCOME: Spatial coherence

OPTIONS	COMMENTARY	RISK
OPTION 1 Monmouthshire LDP Revision, do not progress with SDP	<ul style="list-style-type: none"> In terms of spatial coherence a revised Monmouthshire LDP would offer the flexibility for Monmouthshire to adapt to any future footprints established by Local Government Re-organisation. Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence however a SDP is the best governance mechanism to ensure spatial coherence on the regional basis. 	
OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs	<ul style="list-style-type: none"> A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan. 	
OPTION 3 Monmouthshire LDP Revision & preparation of SDP	<ul style="list-style-type: none"> In terms of spatial coherence a revised Monmouthshire LDP would offer the flexibility for Monmouthshire to adapt to any future footprints established by Local Government Re-organisation. Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence. A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan. 	
OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP	<ul style="list-style-type: none"> The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprint of Joint LDPs do not align with any new footprints that might be established in the medium term. A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan. 	
OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP	<ul style="list-style-type: none"> The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprints of Joint LDPs do not align with any new footprint that might be established in the medium term. However the risk is lower than a four way footprint. A SDP will provide a regional spatial planning framework for the whole Cardiff Capital Region, aligning with the Economic Development Strategy and Regional Transport Plan. 	
OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP	<ul style="list-style-type: none"> The footprint proposed predetermines the footprints for Local Government Reform – could create inefficiencies and difficulties if the footprints of Joint LDPs do not align with any new footprint that might be established in the medium term. Cross-boundary issues can be addressed via collaborative working, common methodologies or shared evidence however a SDP is the best governance mechanism to ensure spatial coherence on the regional basis. 	

PLANNING OUTCOME: Planning certainty and confidence

OPTIONS	COMMENTARY	RISK
<p>OPTION 1 Monmouthshire LDP Revision, do not progress with SDP</p>	<ul style="list-style-type: none"> The Annual Monitoring Reports produced since adoption of the LDP evidences that the Monmouthshire LDP has been successful in delivering the spatial strategy, however, the lack of a 5 year land supply is of concern. As a consequence there is a need to identify additional sites as a matter of urgency. The commencement of a revised LDP would ensure development plan coverage and investor confidence is maintained. Developers in the Monmouthshire area have indicated a preference for a full revision of the LDP to facilitate the identification/allocation of additional housing land to ensure the continued delivery of new housing development and address the shortfall in housing supply. 	
<p>OPTION 2 Local Planning Authorities in the region prepare a SDP & forego individual revisions of their respective LDPs</p>	<ul style="list-style-type: none"> Monmouthshire County Council officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the absence of a revised LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'. Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public. 	
<p>OPTION 3 Monmouthshire LDP Revision & preparation of SDP</p>	<ul style="list-style-type: none"> The Annual Monitoring Reports produced since adoption of the LDP evidences that the Monmouthshire LDP has been successful in delivering the spatial strategy, however, the lack of a 5 year land supply is of concern. As a consequence there is a need to identify additional sites as a matter of urgency. The commencement of a revised LDP would ensure development plan coverage and investor confidence is maintained. Developers in the Monmouthshire area have indicated a preference for a full revision of the LDP to facilitate the identification/allocation of additional housing land to ensure the continued delivery of new housing development and address the shortfall in housing supply. 	
<p>OPTION 4 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent) & preparation of SDP</p>	<ul style="list-style-type: none"> Monmouthshire County Council Officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'. Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public. 	

	<ul style="list-style-type: none"> Preparation of a Joint LDP on this footprint will significantly increase plan preparation time and there is a risk of a Joint LDP not being adopted by all constituent Councils. 	
OPTION 5 Joint LDP (Monmouthshire & Torfaen) & preparation of SDP	<ul style="list-style-type: none"> Monmouthshire County Council Officers support the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, the delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP or SDP is adopted. This combined with the lack of 5 years housing land would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'. Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public. Preparation of a Joint LDP will increase plan preparation time and there is a risk of it not being adopted by both constituent Councils. 	●
OPTION 6 Joint LDP (Monmouthshire, Torfaen, Newport & Blaenau Gwent), do not progress with SDP	<ul style="list-style-type: none"> The delays associated with producing a revised Joint LDP would result in a policy vacuum, absence of allocated sites and protected designations (or an out of date LDP) until either a Joint LDP is adopted. This combined with the lack of 5 years housing land supply would result in significant pressure for speculative development in undesirable locations. As a consequence the LPA would be under significant pressure to release greenfield sites in unsustainable locations to accommodate housing delivery and the potential situation of 'Planning by Appeal'. Without an up to date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from Officers, Members and the general public. Preparation of a Joint LDP will significantly increase plan preparation time and there is a risk of a Joint LDP not being adopted by all constituent Councils. 	●