

Local Plan for Lancaster District 2011–2031: The Adoption of the Strategic Policies & Land Allocations DPD and review of the Development Management DPD

29th July 2020

Report of the Director of Economic Growth & Regeneration

PURPOSE OF REPORT

To seek a Council resolution to formally adopt the Strategic Policies & Land Allocations DPD and a reviewed Development Management DPD as key components of the Local Plan for Lancaster District. This report describes the processes that have led to the preparation of these documents, including independent Public Examination, and the process for formal adoption of the DPDs.

The report also presents the new Local Development Scheme (LDS) which describes the future work on the Local Plan, specifically, it sets out the timescales for an immediate review of the Local Plan in the context of Climate Change and the Council's Climate Emergency Declaration of January 2019.

RECOMMENDATIONS

- (1) That the Council resolves to adopt both the Strategic Policies & Land Allocations DPD and the reviewed Development Management DPD as parts of the Local Plan for Lancaster District 2011–2031.**
- (2) Should the Council resolve to adopt both DPDs that the necessary measures are undertaken to publicise their adoption in accordance with national legislation.**
- (3) That a July 2020 Local Development Scheme (LDS), which is attached to this Report, and the approach to the publication of subsequent reviews, are approved. The LDS sets out the Council's intention to proceed with an immediate Review of the Local Plan in the context of the Climate Emergency Declaration resolved by this Council in January 2019.**

1.0 Introduction

- 1.1 A report to Cabinet on 5 December 2017 on “Advancing the Local Plan for Lancaster District” secured the endorsement of Cabinet for the intention to seek a resolution to publish, obtain representations and submit the Council’s Local Plan to the Government. A report was then presented to Council on the 20 December 2017 seeking a resolution to publish and consult upon a ‘Publication’ version of both the Strategic Policies & Land Allocations DPD and a review of the Development Management DPD. The resolution also sought that, following the statutory publication period, both documents be submitted to the Secretary of State, via the Planning Inspectorate, for Independent Examination.
- 1.2 Consequently, following Council approval, the ‘Publication’ period for both DPDs commenced on 9 February 2018. This was for an eight-week period concluding on 6 April 2018. The Council invited representations on both DPDs in respect of their compliance with national legislation and consistency with planning policy. In total the Council received 586 duly made representations to the Strategic Policies & Land Allocations DPD and 429 duly made representations to the review of the Development Management DPD. The representations made to both DPDs came from 172 separate individuals or organisations.

2.0 Background

- 2.1 Independent Examination provides the final opportunity for interested parties to engage with the development plan process and for concerns on soundness to be identified and explored by a Government appointed independent Planning Inspector. The role of the Inspector is to consider whether the DPDs are ‘sound’ in terms of consistency with national planning guidance and are ‘legally compliant’ with national planning legislation. Richard McCoy, BSc MSc Dip TP MRTPI IHBC was appointed to conduct the examination of the submitted documents.
- 2.2 In September 2018, the Inspector issued a set of initial questions seeking clarification on several matters. Consultation on further evidence was held for the six-week period between 4 January 2019 and 15 February 2019.
- 2.3 After considering the submitted documents, the evidence, and, the representations received, the Inspector advised all parties of his detailed matters, issues and questions in March 2019. These questions formed the basis of discussions at the Examination’s local hearing sessions. The hearing sessions took place at Morecambe Town Hall between 9 April 2019 and 21 May 2019; except for one session which took place at the Storey Institute, Lancaster on 10 April 2019. The Inspector explored the issues that he had identified through discussion which he chaired in a round-table format. Attendance at hearings was open to the public. The Inspector invited parties, including Council officers and advisors, to assist him in considering the issues that he had identified by participating in the discussion.
- 2.4 During the hearing sessions and with the benefit of the daily discussions the Inspector invited the Council to prepare potential wording revisions that might help address the issues that he had identified. On the 31 May the Inspector issued a Post-Hearing Note providing his initial direction on the changes that he would wish the City Council to consult upon. Council Officers compiled a set of Proposed Modifications based on the wording submitted to him during the hearing sessions and his Post-Hearing Note. The purpose of these

potential modifications, or suggested changes, was improve the clarity or consistency of the submitted documents.

- 2.5 Consultation on the 'Proposed Modifications' was held for an eight-week period commencing on 12 August 2019, concluding on 7 October 2019. Representations received were sent to the Inspector for his consideration.
- 2.6 The Council received the Inspector's Report for both DPDs on the 12 June 2020. The Inspector concluded that both the Strategic Policies & Land Allocations DPD and the review of the Development Management DPD 'provide an appropriate basis for the planning of the District', providing that a modifications are made to both DPDs. In other words, the Inspector concluded that the documents have been soundly prepared and can be adopted if they fully incorporate the recommendations in his report.

3.0 Proposal Details

- 3.1 The Inspector sets out his findings and recommendations in his report. These recommendations are necessary to make the DPDs capable of adoption. The key issues are summarised below:

Housing Requirements and Allocations

- 3.2 The Inspector is satisfied with the Council's approach in terms of the housing requirement identified and the allocations made to ensure that there is opportunity to deliver the requirements. The Inspector is satisfied that the housing requirement can be delivered using a 'Stepped Approach'.
- 3.3 This involves working to a lower annual rate of housing delivery in the early stages of the plan, commencing at 400 dwellings per year. Then, over the course of the plan period the rate of development will rise to 675 dwellings per year. This will allow the overall requirement to be achieved during the plan period. The Council maintained that a stepped approach was necessary to allow for the planning and development of substantial new infrastructure, particularly to support development in and beyond the plan period in south Lancaster.

Local Plan Review Mechanism

- 3.4 The Inspector directed at the Examination that a new policy would be required to set out the circumstances which may trigger an early review of the Plan. The circumstances of such a review specifically relate to scenarios where the Plan is under-delivering in terms of housing and employment requirements, the evidence on which the plan has been based changes significantly, or, where critical infrastructure has not been delivered.
- 3.5 This new policy is not related to the Council's intention to undertake an immediate Review of the Plan to address the declaration of a Climate Emergency.

South Lancaster

- 3.6 The Inspector has expressed support for the broad location of growth in Lancaster South, including the development of a Garden Village. Development in Lancaster South is to be advanced through the preparation of an Area Action Plan DPD. The Inspector recognised the importance of growth in Lancaster South to meet the needs of the district during and following the

current plan period.

- 3.7 During the Examination it was made clear that due to the constrained nature of the district and the availability of land to meet short term housing needs that some degree of flexibility would need to be exercised in relation to the early delivery of housing in the Lancaster South area in advance of the Area Action Plan.
- 3.8 Consequently, the Local Plan must now incorporate an 'Early Release Mechanism' which, in exceptional circumstances, will permit development to take place in advance of the finalisation of the Lancaster South Area Action Plan. These exceptional circumstances relate to new development that is consistent with the principles for development (set out in Policy SG1 of the Strategic Policies & Land Allocations DPD), ensuring that contributions are made to the necessary infrastructure in the Lancaster South area and that impact on the local transport network had been assessed.
- 3.9 These exceptional circumstances represent significant expectations upon development in the Lancaster South area while introducing the prospect of development coming forward in advance of a strategic position for growth being established by the Lancaster South AAP. This illustrates the importance of progressing the Area Action Plan.

South Carnforth

- 3.10 The submitted Local Plan included a proposal for approximately 500 new homes on green field land in South Carnforth (described as land to the south of Windermere Road). This allocation would have required land to be removed from the North Lancashire Green Belt. The proposed growth area also proposed a new recreational hub that would have included new sports pitches.
- 3.11 The operators of a local quarry and asphalt plant and quarry industry representatives expressed the view that the proximity of these operations was not compatible with residential development and were concerned that the presence of residential development might result in constraints to these operations.
- 3.12 The Inspector's Post Hearing Note directed the Council to consult on the deletion of the south Carnforth greenfield site. The Council included this change in the consultation on proposed modifications.
- 3.13 In his report the Inspector confirms his initial direction to remove the allocation and clarified his reasons. Accordingly, the site will remain within the North Lancashire Green Belt.

Freemans Wood, Lancaster

- 3.14 The submitted Local Plan identified land at Freemans Wood as a National Planning Policy Framework (NPPF) Local Green Space. NPPF Local Green Spaces are areas of open space that are *the most valued* by local communities. The council had established through consultation a method for identifying NPPF Local Green Spaces, there was much engagement with community interest groups.
- 3.15 The landowner objected to the Local Green Space designation. The Council defended the robustness of the designation process and the designation of this site at the Local Plan hearing sessions. However, the Inspector in his

Post Hearing Note, directed the Council to include the deletion of the Freemans Wood Local Green Spaces designation in the Proposed Modifications Consultation.

- 3.16 In his report the Inspector has maintained his position on the deletion on the basis that the identified site, at more than 12ha, is an extensive tract of land and therefore is outside of the scope of the NPPF's definition of Local Green Spaces which excludes any "extensive tract of land".
- 3.17 Whilst the site is therefore not protected by this highest-value Local Green Space designation it continues to be identified as an open space by the local plan. It is also worth noting that a wholly separate Public Inquiry held in August 2019 resulted in a recommendation that a Town Green application should be granted by the relevant authority, Lancashire County Council, and that a decision to do so was taken in February 2020.
- 3.18 Full details of the matters above and the Inspector's other findings can be read in his appended report.

Status of the Inspector's Report and his Decisions

- 3.19 The recommendations of the Inspector are binding. Should the Council resolve to adopt the Local Plan it must also modify the submitted plan by incorporating all the Inspector's recommendations. The Council is not able to decide which of the Inspector's recommendations to accept.
- 3.20 Officers have prepared July 2020 "Adoption Versions" of both the DPDs incorporating the modifications. Minor modifications, to correct factual errors and improve clarity and consistency, have also been made. The Adoption Versions require placing the text of the Inspector's binding recommendations within the submitted documents; checking for accuracy, consistency, clarity, and, factual updates, is necessary before the final versions are achieved and published.

4.0 Details of Consultation

- 4.1 Extensive consultation and engagement occurred during the preparation of the DPDs. Consultation Reports have been prepared and published at the appropriate stages during the plan's preparation.
- 4.2 Should the Council resolve to adopt the DPDs for planning purposes, no further consultation is required. Following the implementation of a Council resolution to adopt the DPDs they will become formal parts of the **Local Development Plan** for Lancaster District and can be used for planning purposes and to support the realisation of development needs, regeneration and economic growth.
- 4.3 Should the Council resolve to adopt the DPDs the Council must publicise its decision. For a period of six weeks the Council's decision to adopt the development plan documents can be sought by requesting a statutory review which is similar to a Judicial Review. If such a case were brought the plan would continue in force unless and until the High Court made any order.
- 4.4 Please note: several temporary updates have been made to the Statement of Community Involvement in response to the COVID-19 social distancing requirements. The updated document can be viewed on the Council's Planning Policy Consultation web page.

5.0 Options Analysis

5.1 Members are reminded that it was the Council itself which resolved to submit its Local Plan documents to the Government. It is the Council itself which decided on the content of the documents. The purpose of submission to Government is to provide the opportunity for the government to independently determine if the Council's Local Plan has been properly prepared. The appointed Inspector has concluded that the plan has been properly prepared, and, now providing that the plan incorporates his recommendations, which are in effect the modifications that the Council has already consulted upon, the Council can formally adopt its own plan.

5.2 Paragraph 058 of [Planning Practice Guidance](#) describes what a local planning authority is anticipated to do after the Inspector's Report is received. The guidance states that:

'While the local planning authority is not legally required to adopt its local plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.'

5.3 The decision before members is a binary one; the Council can either choose to adopt the plan which it submitted or not adopt the plan which it submitted. A decision to adopt the plan is the rational expectation at the end of a process that has involved expending substantial time, effort, and resources to ensure that the Council can deliver its development needs.

5.4 Upon adoption the Council will have an up-to-date suite of policies and allocations that direct where development should be located and where it should not be located. The Council will have the ability to implement regeneration plans; prepare supplementary guidance, and, protect the natural and historic environment and determine planning applications in accordance with up-to-date policies.

5.5 Upon adoption Sites allocated by the plan can in principle be counted as contributing to the housing land supply because of being allocated in the local plan. Bringing forward new land allocations for development will mean that the Council will have a much better ability to resist development proposals on sites that have not been identified for development during the eight-year process of developing the Local Plan.

5.6 Adopting the Local Plan means that formal Supplementary Planning Documents (SPD), including the Strategic Regeneration Framework for the Canal Quarter SPD, the Housing in Multiple Occupation SPD; and the Air Quality & Low Emissions SPD which all supplement the relevant local plan policies can also be adopted. Adopting the plan means that the clear direction is provided on regeneration and development proposals which are the subject of infrastructure and other funding bids. Conversely, to not adopt the plan puts such bids at risk.

5.7 The adoption of the plan means that the determination of all development proposals will be based on up-to-date policies that replace the "saved" policies that the Council currently relies upon in the Lancaster District Local Plan of 2004; the Lancaster District Core Strategy of 2008, both prepared before the National planning Policy Framework of 2012 and now outdated; and, the Development Management Policies DPD of 2014.

5.8 To adopt the plan would mean that the Council can then promptly start a

review of the plan and consider if its policies should be re-visited following its declaration of a Climate Emergency in January 2019. This can be achieved in a relatively short timescale. By not adopting the Local Plan the opportunity to achieve this promptly would be lost, as the process of plan preparation would have to restart.

- 5.9 Conversely, to decide not to adopt the local plan does not offer any apparent advantages to development planning in Lancaster district.
- 5.10 The Examination explored many challenges and objections to the plan. The Inspector has considered these and has determined that the plan is capable of adoption. The Council would have to be very clear on its planning reasons for not proceeding with the adoption of its own local plan.
- 5.11 A decision to not adopt the plan, particularly one that has following the conclusion of an eight-year plan preparation process, would be a surprising one. The timescale and the outcomes of preparing a new plan in the context of not having adopted its own submitted plan will mean continuing uncertainty on the location of development for years to come in the context of a very much weaker position for determining development proposals which are likely to have been advantaged by the absence of an up-to-date local plan.
- 5.12 To re-start the Local Plan process will require setting a new timescale to; procure new evidence, undertake public engagement, prepare new documents, undertake consultation, submit new plans to the Government, and support a new independent Examination. The outcomes of preparing a new local plan in the absence of an up-to-date development plan are not predictable, however, significant resource implications and continuing uncertainty on the location of development will be unavoidable.
- 5.13 The Council would have to continue to determine planning applications based on out-of-date policies. This is likely to result in challenge from the development industry on the continued applicability of policies which bring development benefits such as affordable housing; likely poorer performance on planning appeals and development outcomes that offer poorer sustainability characteristics. It can be anticipated that a decision not to adopt its own local plan would have serious implications for the Council's reputation with residents, partners, stakeholders, development investors and infrastructure funders, including national agencies.
- 5.14 Should the Council not adopt its own Local Plan the Government is likely to commence correspondence with the Council. Members are advised that the Government's White Paper on planning, published earlier this year, anticipates a requirement for all Local Planning Authorities to have an up-to-date Local Plan in place by 2023. Should the Government implement this requirement then, a decision to not adopt the Local Plan will mean that it is very unlikely that a new plan could be in place on time: clearly this may increase the prospect of Government intervention in the district's local planning processes. Indeed, that has already taken place in the preparation of the South Oxfordshire Local Plan which is currently at examination at the direction of the Secretary of State after the Council chose to withdraw it.

6.0 Officer Recommendation

- 6.1 The adoption of both DPDs will provide the Council with an up-to-date suite of planning policies and allocations with which to determine planning applications in accordance with national planning policy within the National Planning Policy Framework (NPPF). It will enable an immediate review to take place to seek to address a number of important issues, such as the climate

change emergency without reverting back to the start of the entire process, which would result in a much longer delay than a targeted review.

- 6.2 The benefits of having an up-to-date, robust suite of planning policies and allocations for the district is significant. It will give the Council the opportunity to manage development proposals on a consistent basis across the whole district. Decisions can be taken using an up-to-date and robust local planning policy framework which will be less open to challenge than the alternative of continuing to use an ageing suite of allocations and policies, some of which were prepared prior to the current national planning guidance in the National Planning Policy Framework in 2012.
- 6.3 Implementing this option will also enable the Council to move forward formally with the Review of the Local Plan where it will seek to support the content and direction of the Council's Climate Emergency Declaration made in January 2019, this is described in further detail in Section 7 of this Report. It will also enable the Council to implement new supplementary planning documents.
- 6.4 In summary, it is of course anticipated that after a long plan preparation process the Council will adopt its Local Plan. This will ensure that the Council meets its obligations on development planning and provides greater certainty on the location of development. It is not at all apparent that there are any advantages in choosing not to adopt its Local Plan. Members are therefore strongly advised to adopt the Local Plan and subsequently instruct officers to immediately commence work to review the documents in the context of the Council's Climate Emergency Declaration of January 2019.

7.0 Local Development Scheme

- 7.1 In January 2019 Members declared a Climate Emergency and set out several actions which would seek to address the Climate Emergency.
- 7.2 The declaration came too late to influence the preparation of the current Local Plan, which had already been submitted to the Government in May 2018. However, Members have made it known that they wish to see an immediate review of the Local Plan in the context of the Climate Emergency as soon as possible.
- 7.3 Work has already begun on this Review, a Local Plan Review Group (LPRG) has been established (Chaired by the Portfolio Holder for Planning Policy). This has already set parameters for the Review process and identified a range of topics and themes which the Review can further investigated.
- 7.4 Should Members seek to adopt the Local Plan, then the review process can formally be established, and public engagement can commence immediately through an initial scoping process which will take place over the coming months.
- 7.5 This report is accompanied by a proposed July 2020 Local Development Scheme (LDS) that would be effective should the Council adopt the Local Plan. This sets out the DPDs and SPDs that would be prepared, accompanied by a timetable.
- 7.6 The Council is additionally asked to approve the publication of the LDS and accordingly expedite the start of the process of the Climate Emergency review of the documents. Council is also asked to confirm the practice of delegating the publication of subsequent reviews of the LDS (which are necessary, and may be frequent, to take account of timetable updates and progress made on preparing DPDs and SPDs) to the Service Manager - Planning and Housing

Strategy, following approval from Senior Service Management and endorsement of the Portfolio Holder for Planning Policy.

8.0 Conclusion

The Strategic Policies & Land Allocations DPD and the reviewed Development Management DPD are two of the core elements of the Local Plan for Lancaster District 2011–2031. Once adopted the Council will have a robust planning policy position in which to manage the delivery of sustainable development within the district. The adoption of these DPDs provides the framework needed to ensure that a positive approach to sustainable development to meet the district's development needs is achieved.

- 8.1 The adoption of these DPD's will provide the basis for the Council to formally commence the Local Plan Review to address the declaration of a Climate Emergency. The adoption will allow for further Supplementary Planning Guidance to be prepared; for example, the SPD which has been prepared for the Canal Quarter and the preparation of an SPD on Air Quality Mitigation.
- 8.2 In conclusion, the Council is advised and formally requested to approve the adoption of both the Strategic Policies & Land Allocations DPD and the reviewed Development Management DPD for planning purposes as part of the Local Development Plan for Lancaster District.

8.0 Appendices and Background Reports

- 8.1 The July 2020 "Adoption Versions" of both the Strategic Policies & Land Allocations DPD and the Review of the Development Management Policies DPD are attached as Appendix 1 and 3 respectively.
- 8.2 These are the submitted documents incorporating the Inspector's recommended main modifications and several minor modifications made by the Council which do not affect the content of policies within either document.
- 8.3 Final editions of both documents will be printed following the conclusion of the adoption process. The final print may contain further minor corrections, for example to correct typographical errors and formatting.
- 8.4 The associated policies maps that accompany the Strategic Policies & Land Allocations DPD are presented as Appendix 2.
- 8.5 The Inspector's Report, which includes his binding recommendations (main modifications) is attached as Appendix 4. The Council's Equality Impact Assessment for the adoption of both DPDs is attached as Appendix 5.

Appendix 1: Strategic Policies & Land Allocations Development Plan Document, Adoption Edition dated, May 2020.

Appendix 2a: Strategic Policies & Land Allocations Development Plan Document, Local Plan Policies Maps and Insets 1-5, Adoption Edition, May 2020.

Appendix 2b: Strategic Policies & Land Allocations Development Plan Document, Sustainable Settlements Mapbook, Adoption Edition, May 2020.

Appendix 3: Reviewed Development Management Development Plan

Document, Adoption Edition, May 2020.

Appendix 4: Report of the appointed Planning Inspector, Mr Richard McCoy, into the Strategic Policies & Land Allocations DPD and the Reviewed Development Management Development Plan Document, Adoption Edition, May 2020.

Appendix 5: Equality Impact Assessment, dated April 2020.

Appendix 6: July 2020 Draft Local Development Scheme (LDS)

RELATIONSHIP TO POLICY FRAMEWORK

National Planning Policy Framework (2019) – Requires all Local Authorities to prepare a Local Development Plan for their area setting out how objectively assessed development needs will be met and clear planning policies on what or will not be permitted.

National Planning Practice Guidance – Provides guidance for Local Authorities and other interested parties on how the detail of the National Planning Policy Framework should be implemented in practice.

Lancaster District Council Plan 2018-2022 – Development Plan Documents adopted by the Council form part of the Local Plan for Lancaster District. Policies within the Local Plan seek to deliver the Council's priorities as described in the Council Plan.

CONCLUSION OF IMPACT ASSESSMENT

(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, HR, Sustainability and Rural Proofing)

The Strategic Policies & Land Allocations DPD and the reviewed Development Management DPD provides a planning policy framework to guide and manage development across the district.

Equality, diversity and sustainability implications have been taken into account through the preparation of the draft DPD documents. The documents have been subject to the statutory requirements for Strategic Environmental Assessment. Equality, diversity, human rights, community safety, sustainability and rural issues are all considered as part of this process. Officers are confident that this work provides an appropriate impact assessment of the DPDs and this has been confirmed by the Planning Inspector.

LEGAL IMPLICATIONS

The preparation of Local Plan documents is subject to legislation and regulations. Failure to meet these requirements could result in the DPDs being subject to legal challenge. The Planning Inspector has considered the preparation of both DPDs in terms of relevant legal requirements and concluded that both documents have been prepared in accordance with legislation and are considered sound. The Council consulted on its proposed modifications in the autumn of 2019 and cannot now make any further changes. The Inspectors modifications are binding, thus the final form of the adopted DPD must fully incorporate his recommendations.

FINANCIAL IMPLICATIONS

It is not expected that there will be any additional financial implications arising from this report as costs connected with the preparation of both DPDs and associated public

consultation, publication and submission, public examination and DPD adoption have already been accounted for within the overarching Local Plan revenue budget.

There can, on occasion, be additional unanticipated costs arising from legal challenges to the adoption of a DPD, usually as a result of actions from affected parties. It is difficult to pre-empt whether there will be any future legal challenges arising. However, if they did, then the associated costs and implications will be reported and dealt with as appropriate through the normal monitoring processes which the Council has in place.

The adoption of both DPDs, which form key elements of the Local Plan, will increase the Council's ability to manage future development in the district, therefore better managing related financial risks for the Council.

OTHER RESOURCE IMPLICATIONS

Human Resources:

The Economic Growth and Regeneration Directorate is resourced to advance the changes of preparing DPDs as part of the Council's Local Plan.

Information Services:

No direct implications.

Property:

No direct implications. The Local Plan establishes policies, thus there are direct consequences upon adoption.

Open Spaces:

No direct implications. The Local Plan establishes policies, thus there are direct consequences upon adoption.

SECTION 151 OFFICER'S COMMENTS

The s151 Officer has been consulted and has no comments to add.

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has been consulted and has no comments to add. The Local Development Plan and Development Plan Documents form part of the Policy Framework of the Council, adoption of which must be by Full Council.

BACKGROUND PAPERS

1. Strategic Policies & Land Allocations Development Plan Document, Adoption Edition, July 2020.
2. Strategic Policies & Land Allocations Development Plan Document, Local Plan Policies Maps (and Insets 1-5).
3. Reviewed Development Management Development Plan Document, Adoption Edition, July 2020.
4. Report to Lancaster City Council by Mr Richard McCoy, an Inspector appointed by the Secretary of State for Housing, Communities and Local Government, on the Examination into the Lancaster District Local Plan (Strategic Policies & Land Allocations DPD and the

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<p>reviewed Development Management DPD), June 2020.</p> <p>5. Equality Impact Assessment, July 2020</p> <p>6. Draft Local Development Scheme (LDS) July 2020</p>	
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