



Oxford – Development and Planning

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Leverhulme Estate's representation to the Wirral Local Plan Submission Draft – Main Modifications Consultation

Prepared on behalf of:

Leverhulme Estate


8 November 2024

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Main Modifications Consultation

1. Strutt & Parker acts on behalf of the Leverhulme Estate. We have made representations to all previous consultation stages into Wirral Council’s Submission Draft Local Plan (the ‘Plan’), specifically in relation to the draft planning policies and strategy therein. This representation follows Leverhulme Estate’s previous consultation representations and Examination in Public (‘EiP’) submissions.
2. Leverhulme also forms part of the Development Consortium in Wirral (‘the Consortium’) and fully endorses the Main Modification Representation put forward by the Consortium.
3. Further to the examination hearing sessions held into the emerging Wirral Local Plan (‘WLP’) (2022 – 2040) between April and November 2023, the Council is now inviting comments on its proposed Main Modifications (“MM(s)”) to the Plan, which it considers necessary to make the submitted Plan sound and/or legally compliant. The below sets out the representations to the MMs on behalf of the Leverhulme.

Executive Summary

4. The submitted plan was predicated on meeting Wirral’s identified housing need of 13,360 homes through a brownfield only regeneration strategy. The plan set out that in meeting the housing need, there was not sufficient justification for exceptional circumstances in which to review and allocate additional sites in the Green Belt.
5. Through examination of the plan, and in particular the housing land supply position, it was concluded that there are not sufficient sites to satisfy the plans objective – only 11,814 homes can be potentially delivered, and the need should incorporate C2 need taking it to 14,400 homes.

6. The MM's have now confirmed:-
 - i. a material lack of supply – a reduction of 4,508 homes and a shortfall of 2,586 against the plans identified need.
 - ii. in addition to the reduced supply, a need for a stepped approach and an even lower delivery in the first 5 years.
 - iii. the reduced supply, even then, relies on significant grant funding and subsidy that has not been evidenced or can be relied upon.
 - iv. there is no meaningful policy proposed to test viability.
 - v. an acknowledged and totally insufficient supply of affordable homes.
 - vi. an acknowledged need and totally ignored supply of Class C2 provision.

7. It has therefore been proven and accepted by all parties that the housing supply objective of the plan cannot be met.

8. It is an extremely high risk flawed strategy and results in a plan which will not deliver if it proceeds on unsound fundamentals and unmet objectives at the point of adoption. This is untenable in its own terms and even more so when considered directly against the Written Ministerial Statement (the 'WMS') from Minister of State, Matthew Pennycook MP, (dated 30 July 2023) on the acceptability of plans in examination and the further significant uplift in draft housing numbers for the borough as set out in the revised Standard Method.

9. The MM's do not even seek any form of mitigation of an unsound starting point by providing for a robust and clear immediate review despite the known and accepted shortcomings as above.

Main Modifications – Combined Effect

10. It is of deep and fundamental concern that compelling evidence presented by Leverhulme and the Consortium that was seemingly accepted at Examination in Public, including on affordable housing, Class C2 provision, and viability, has not been addressed in the MMs.

11. Furthermore, taken together, the MMs that have been proposed are so substantial that they effectively constitute a re-writing of the Plan. This extends far beyond the statutory remit of MMs established by Planning Practice Guidance¹ (PPG).
12. As a direct consequence of the proposed MMs, there is a significant shortfall in the supply of housing land and the Plan does not meet, and nor does it seek to meet, the minimum housing needs of the Borough. Given this and the failure to address the above-mentioned issues and all of the detailed matters set out below, the proposed changes result in an unsound Plan.
13. Consequently, the combined effect of the Main Modifications is such that the emerging Plan should be withdrawn.
14. Notwithstanding all of this and as set out in the Letter to the Inspectors from Lichfields on behalf of the Consortium (Ref.42231/08/SPM/BOC/33015703v1), Leverhulme expressly agrees that the Examination must be re-opened to consider the implications of the imminent changes to National Planning Policy and the WMS at the earliest possible opportunity.
15. Despite the Council's admission of its failure to identify sufficient land to meet housing needs, the proposed changes still rely on the pushing back of the delivery of homes and the failure to evidence future deliverability of affordable homes. Further, the proposed MMs show that the delivery of housing on allocated sites is predicated on the availability of unidentified, un-evidenced and highly unlikely grant funding.
16. Despite all of this, the proposed Plan still results in a very significant shortfall in housing delivery over the first five years and the Plan period as a whole. If the latest local housing need figure using the standard method was used from the plan start date, there would also be a very significant fall over both time periods. The Council has no 5 Years Housing

¹ PPG Reference ID: 61-057-20190315

and Supply and intends to adopt a Local Plan which will mean that not only will it continue to have no 5 Year Housing Land Supply, but that it will have a “new” Local Plan so entirely incapable of meeting housing need as to be unfit for purpose.

17. This is not good planning and fails to reflect a planning system founded upon providing for sustainable development. The Council is seeking to adopt a Local Plan that does not provide for sustainable development. There is a fundamental issue with the Plan’s soundness in terms of the supply of housing that the Council remains obstinately unwilling to address, regardless of the evidenced implications.

MM5 - Policy WS 1 (Development and Regeneration Strategy)

18. Leverhulme’s Regulation 19 representation to Policy WS1 fundamentally disagreed with the development and regeneration strategy for Wirral set by Policy WS 1 and set out that the policy is significantly flawed and fundamentally unsound.

19. Leverhulme’s position remains that this policy and thus, the Plan as a whole, is significantly flawed and fundamentally unsound.

20. Following the closure of the hearing sessions in November 2023, it has now become abundantly clear to all that the Council has significant deficiencies, to the point of extremely serious, housing land supply issues.

21. Even so, the position is in fact, worsened by the proposed MMs.

22. The Plan requirement is now 14,400 net additional dwellings, including new affordable dwellings, yet the Council’s identified supply now only amounts to 11,814 dwellings. This is a **reduction**, down from 16,322 dwellings.

23. Furthermore, and fundamentally - as evidenced by our previous representations and those of the Consortium - the majority of the retained allocations in the emerging plan are unviable. For clarity, they are unviable to the point of not being deliverable without

significant grant funding. There is no evidence of any such funding and no evidence of the prospect of there being any such funding at any given point in the future.

24. Further comment on viability is set out below under the relevant MMs and in the Main Modification Representation put forward by the Consortium.

25. It should also be noted that MM5 has also seen the economic growth scenario unjustifiably dropped from the Plan.

26. No justification for this fundamental change in approach has been provided by the Council.

27. Simply put, the Council is now presenting a plan which does **not** seek to meet the Borough's housing requirements. This is despite an amended (as part of the additional modifications) paragraph 1.3 of the Plan which states that the objectively assessed housing needs can be met over the Plan period:

*“The spatial strategy focusses on the regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. Sufficient brownfield land and opportunities exist within the urban areas of the Borough to ensure, subject to delivery, **that objectively assessed housing and employment needs can be met over the Plan period.** The Council has therefore concluded that the exceptional circumstances to justify alterations to the Green Belt boundaries set out in national planning policy do not exist in Wirral.” (Our emphasis)*

28. It is clear from the evidence that the Leverhulme Estate and the Consortium have previously submitted that Wirral does not have a sufficient supply of homes in the short term. These are not simply numbers in a plan, but homes, that are desperately needed for people to live in now.

29. However, remarkably, rather than plan to meet housing need, the proposed MMs now set out the Council's admission of a shortfall in the supply of housing over the entire plan period.
30. This means that Wirral's current housing crisis will worsen over the plan period. This inevitably results in scope for this shortfall having to be met by neighbouring authorities. However, there is no evidence at all of discussions with neighbouring authorities offering to help to meet this unmet need. This is short-sighted and is unsound².
31. The proposed MMs create an artificial 5-year housing land supply on adoption through a stepped approach, and then fail to meet the requirements in the later years of the Plan. This approach is in direct conflict with the PPG³. It is clearly not '*positively prepared*', '*justified*', '*effective*' nor '*consistent with adopted [or emerging] national policy*'⁴. It is thus unequivocally unsound.
32. More viable and deliverable housing sites are clearly needed. If sufficient new homes are not provided to meet increasing demand, then there is a real and significant risk that affordability levels will worsen, and people will not have access to suitable accommodation to meet their needs. The proposed MMs do not plan for the future ***and*** render the ongoing situation worse.
33. Furthermore, modified Policy WS 1 acknowledges the need for 1,149 residential care places for older people (C2 Class units) on top of the 14,400 net additional market and affordable dwellings. No strategy is identified for meeting this need.
34. Consequently, the Council acknowledges that a housing challenge exists but does nothing to present a positively planned and effective strategy for meeting an explicitly identified need. Again, the Plan is clearly unsound.

² NPPF December 2023 – Para 35

³ PPG Reference ID: 68-021-20190722

⁴ NPPF December 2023 – Para 35

35. No strategy or solution for meeting the immediate and medium/long term shortfall has been put forward as part of the MMs, and it is simply not possible to consider that the plan has been ‘positively prepared’ (i.e. seeking, as a minimum, to meet the area’s objectively assessed needs), ‘justified’ or ‘effective’ as required by paragraph 35 of the current National Planning Policy Framework (‘NPPF’).

36. On 30 July 2023, Minister of State, Matthew Pennycook MP, issued a WMS to stakeholders about the Government’s plan to build the homes the country needs. A WMS is an official document issued by a government minister and as such is an immediate material consideration in decision making including the preparation of Local Plans.

37. The WMS states:

*“We [the Government] will also empower Inspectors to be able to take the tough decisions they need to at examination, by being clear that they **should not be devoting significant time and energy during an examination to ‘fix’ a deficient plan** – in turn allowing Inspectors to focus on those plans that are capable of being found sound and can be adopted quickly.” (Our emphasis)*

38. Furthermore, in another letter from Minister of State, Matthew Pennycook MP to Paul Morrison, Chief Executive of The Planning Inspectorate (PINS), on 30 July 2024⁵, Mr Pennycook stated that:

*“Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. **Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall.** Local authorities should provide regular progress updates of their work to the Planning Inspector during any agreed pause.” (Our emphasis)*

⁵ <https://assets.publishing.service.gov.uk/media/66aa157b0808eaf43b50dad5/minister-pennycook-to-chief-executive-of-planning-inspectorate.pdf>

39. Taking the proposed MMs into account, the Plan does not provide for sufficient housing in a sustainable manner, per the very first paragraph of the NPPF. **If this Plan is pursued without significant additional allocations of viable and deliverable sites, it cannot be found sound.**
40. However, to find such sites and further update this fundamentally flawed plan would fit squarely within the definition of “*devoting significant time and energy during an examination to ‘fix’ a deficient plan*” as set out in the WMS. Given this, the same approach should be taken with the Plan as that recently taken in respect of the deficient Elmbridge and Solihull Local Plans.
41. In short, the Plan is fundamentally flawed. It is only capable of being sound through extensive new allocations in the Green Belt. This would take such a significant amount of time, that in doing so, it would be in direct conflict with the WMS and the letter to PINS from Matthew Pennycook MP.
42. Furthermore, as set out in the Letter to the Inspectors from Lichfields on behalf of the Consortium (Ref.42231/08/SPM/BOC/33015703v1); while the emerging Plan does not need to be assessed against the forthcoming revised NPPF and its new standard method, there is absolutely no uncertainty whatsoever in respect of the clear shift in the direction of central Government planning policy.
43. Taken with the fundamental flaws that remain, and indeed have worsened since the submission of the Plan, the Plan should be withdrawn. This would allow for a sound plan, which “*as a minimum, seeks to meet the area’s objectively assessed needs⁶*” in line with national policy, to be brought forward.

Green Belt

44. MM5 also inserts the following into Policy WS1:

“National policy for the Green Belt will apply in the determination of relevant proposals.”

⁶ NPPF December 2023 – Para 35(a)

45. This approach has been applied to reflect the Council’s unevidenced stance that there are no exceptional circumstances to justify alterations to the Green Belt boundaries as the “*objectively assessed housing and employment needs **can** be met over the Plan period*” (Paragraph 1.3 of the Plan) (Our emphasis).
46. As evidenced above, this emerging Plan does not meet the objectively assessed housing need. It therefore follows that, if objectively assessed housing and employment needs cannot be met over the Plan period, then exceptional circumstances do exist to consider the alteration of Green Belt boundaries.
47. This could, by way of example, include allocating sites in the Green Belt alongside the in-setting of existing settlements as Leverhulme Estate has set out in previous representations.
48. NPPF Para 149 states “*If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt*”. Equally, the opposite is true for villages that do not make this important contribution to openness, and these villages should be excluded from the Green Belt.
49. This MM fails to consider this important national policy. Rather, it further unnecessarily restricts housing and economic development opportunities in these areas. This is a failure of the proposed MM, as it is essential to the long-term prospects of these settlements and their communities that their social and economic needs can be met, without needing to clear the high bar of ‘Very Special Circumstances’.
50. In addition to this, this MM reflects a failure to plan within the context of evidenced significant and transformational changes taking place in rural areas. It fails to reflect national planning policy, which explicitly supports the move away from a principally agricultural economy to a more relevant and economically viable diversified rural economy.

MM6 – Policy WS1 Supporting Text

51. Leverhulme and the Consortium has provided significant evidence of the viability issues faced in the Borough.
52. The introduction of a new paragraph above paragraph 3.33 into the Plan represents a glaring admission from the Council to the lack of viability and clear development strategy characterised by the original and modified Plans:
- “The Local Plan strategy is premised on achieving momentum in respect of regeneration, increasing density where appropriate and increasing the viability of development over the Plan period. As such although **the Local Plan does not contain sufficient deliverable or developable sites** at the time of the examination to meet the full housing requirement of 14,400, it provides a policy framework that will enable that provision (along with robust monitoring and provision for review in the eventuality that is not realised over time).”*
53. This paragraph reflects significant issues in both the content and strategy of the Local Plan. It exposes fundamental flaws and clear obstacles to the delivery of urban regeneration.
54. The new paragraph admits that the Local Plan does not currently contain enough deliverable or developable sites to meet the full housing requirement of 14,400 units.
55. This is a critical failure. Further, the stated reliance on a “policy framework” without immediate solutions or evidence of deliverability is entirely characteristic of a Plan that lacks both foresight and accountability in addressing the area’s housing needs.
56. The paragraph is simply reflective of the flawed strategy. It’s entirely subjective and overly optimistic suggestion that housing targets will be achieved through “regeneration” and “increasing density.” It is not only unevicenced, but flies in the face of all evidence and is contrary to the Council’s own admission to its allocations being unviable and reliant upon unidentified grant funding.

57. Effective regeneration strategies are not the result of one-size-fits-all solutions. Regeneration can face multiple, substantial hurdles, including for example, worsening viability as density increases as evidenced in Table ES.3 of the Aspinall Verdi report for the Council (Document: WBC031 Response to Development Consortium's Viability Key Matters⁷).
58. Substantive evidence has demonstrated the unviable nature of the Plan's regeneration proposals, but the very mention of "*increasing the viability of development*" points directly to the fact that the Council itself now accepts the flaws at the heart of the Plan's financial assumptions.
59. The emerging Plan is predicated on the vague hope that development viability will improve. However, the Plan provides absolutely no substantive evidence or mechanisms to support this.
60. Additionally, ambiguous assurances of "*robust monitoring and provision for review*" are simply platitudes suggestive of an entirely reactive rather than proactive approach, placing future progress in jeopardy if – as is inevitable in respect of urban regeneration reliant upon public funding - unforeseen challenges emerge.
61. Overall, the paragraph's reliance on abstract concepts and unsubstantiated optimism entirely undermines the credibility of the emerging Local Plan. The approach is neither clear nor unambiguous. Consequently, given the absence of concrete, actionable steps, realistic financial projections or grant funding, and transparent timelines, there is an unquestionable risk that the Plan will fall short of its goals. The Plan is unsound.

⁷ <https://www.wirral.gov.uk/sites/default/files/2023-07/WBC031%20Response%20to%20Development%20Consortium%27s%20Viability%20Key%20Matters.pdf>

62. Further, even if the Plan's goals could somehow be achieved – and there is absolutely no substantive evidence to demonstrate that might the case – the proposed Plan would still fail to meet the minimum housing need. The Plan would still be unsound.
63. The lack of viability that characterises the Local Plan's approach will also have a detrimental impact on the delivery of what is acknowledged to be much-needed affordable housing in the Borough. The strategic allocations are unviable, and it therefore necessarily follows that fewer affordable units will be delivered. This will further exacerbate the housing needs of the most deprived communities in the Wirral.
64. Put simply, whilst it seems inconceivable, the Council is actually seeking to adopt a Plan which will fail to deliver sufficient affordable housing. Regardless of the fact that the approach is unsound in planning terms, this cannot be acceptable.
65. In summary, the Plan's development strategy, as described, is alarmingly vague and inadequate. The Council must be required (if not compelled) to prepare and deliver a robust and evidenced Local Plan strategy which addresses both market and affordable housing needs. As currently drafted, and with the MMs, this Plan remains fundamentally flawed and is not capable of being found sound in accordance with NPPF Paragraph 35.

MM9 - Viability of Development

66. The Council's reliance on grant funding, twinned with the expectation that site developers independently secure this funding, raises multiple significant concerns. This is especially the case, given the broader context of viability testing and the known viability shortfall. These concerns are summarised under two subheadings below:

1. Over-reliance on Grant Funding as a Development Enabler

67. The Local Plan's strategy suggests that public funding or developer-sought grants should bridge viability gaps. However, there is no evidence that sufficient public funding is or will ever be available; and placing a burden on developers to independently secure grants is problematic and introduces further significant uncertainty.

68. For example, not all developers, particularly SME developers and housebuilders, have equal access to, or expertise in, securing grant funding. The NPPF at paragraph 70 recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area, and notes that such sites can often be built out relatively quickly. Introducing a reliance on developers to independently secure grants assumes an entirely unevidenced level of resources and specialised financial acumen that may not be realistic, which could deter SMEs and thus reduce delivery further.

69. Furthermore, the availability and accessibility of public and private grants will inevitably fluctuate with government priorities and economic conditions. A local plan that hinges on whatever grants that might exist at any one-time lacks certainty, reliability, risks project delays, and fundamentally, significantly increases the quantum of unviable and thus undeliverable allocated sites wherever developers fail to secure necessary funding.

70. Notwithstanding all of the above, there is in any case, no substantive evidence to demonstrate that sufficient grant funding either exists or will exist at any given point in the future. Noting that, despite the tax burden imposed by the October 2024 Budget, no additional funding was identified for regeneration in Wirral, suggesting that the Council's vague hopes and ambiguous strategy in this regard is entirely unrealistic.

2. Inadequate Viability Testing and Acknowledged Viability Shortfall

71. The fourth new paragraph under the new 'Viability of Development' heading states that *"all policy requirements including planning obligation requirements set out within the Local Plan have been subject to Plan wide viability testing. Planning applications that comply with the policy requirements are assumed to be viable."*

72. The Council here assumes that applications conforming to the Local Plan are inherently viable. However, the Council's viability testing of Local Plan policies and obligations has evidently revealed a viability shortfall, and placing the onus on developers simply sidesteps **the systemic viability issues that the Plan itself should address.**

73. This approach is clearly unsound. It seeks to shift entirely unrealistic expectations on to developers. The proposed Plan acknowledges that its regeneration allocations are not viable and consequently, this approach would simply result in a higher volume of applications requiring viability assessments.

74. This unsound approach is ineffective, unjustified and inconsistent with national policy⁸.

MM11 - Policy WS 4 (Tourism sub-section)

75. Policy WS 4 (Part L) remains deficient in its approach to rural tourism and rural economic support, as evidenced by its narrow and reactive wording. Although it acknowledges tourism by including “*and tourist*” in its wording, this addition is merely superficial and fails to address the full scope of economic and community opportunities and needs in rural areas.

76. This minimal modification reflects an oversight in prioritising and a failure to properly consider the rural economy’s potential contributions to the borough’s broader strategic objectives, as laid out in Strategic Objectives 5 and 11 of the Plan, repeated below:

*(5) “**Protect and enhance the connectivity, quality and accessibility of urban and rural** green Strategic space, and multifunctional green and blue infrastructure. Protect nature by ensuring development delivers measurable net gains for biodiversity and the blue and green infrastructure network continues to grow” (Our emphasis), and;*

*(11) “Provide a range of employment and mixed-use sites to meet needs, attracting inward investment, provide work opportunities for our residents and foster an environment where existing businesses and new, innovative start-ups can prosper **whilst supporting a thriving and diverse rural and visitor economy.**” (Our emphasis)*

⁸ NPPF December 2023 – Para 35(a)

77. By setting minimal allowances for rural tourism facilities, Policy WS 4 (Part L) fails to align with the positive, proactive mandate of the NPPF at Paragraph 150. Instead of fostering opportunities for the Green Belt's beneficial uses, such as enhancing accessibility, outdoor recreation, and landscape quality, the policy appears to limit rural tourism development to the narrowest possible interpretation of Green Belt preservation; ultimately restricting community access to social, environmental, and economic benefits.
78. Unlike designated "Urban Tourism Areas" in the Plan, which actively encourage development and enhance visitor appeal, rural areas are deprived of similar support. The absence of equivalent "Rural Tourism Areas" fails to leverage the unique attractions, landscapes, and heritage of rural settings, consequently underutilising the Green Belt's potential as an asset. Rather, the approach set out effectively results in the treatment of the Borough's rural area as a "dead space."
79. This narrow approach does not provide sufficient support for the area's diverse range of rural economic activities, nor does it address the needs of communities living in the Green Belt. It restricts landowners and rural enterprises from pursuing development that could contribute to the Borough's economic vitality, employment opportunities, and sustainable tourism. This ultimately jeopardises the long-term viability of the rural area and its communities.
80. To make this policy sound in order to rectify these deficiencies and align Policy WS 4 (Part L) with both the NPPF and the Plan's Strategic Objectives, the policy should be revised as follows:

Inset Key Settlements from the Green Belt

81. As highlighted above, this would allow targeted rural settlements within SA8 to engage in development activities that support local tourism and the economy without the undue constraints imposed by Green Belt policy. Allowing these areas to develop is essential for realising a balanced economy that benefits the Borough as a whole.

Establish Designated 'Rural Tourism Areas':

82. Mirroring the approach to 'Urban Tourism Areas,' 'Rural Tourism Areas' should be identified and supported within the Green Belt to promote rural tourism. This designation would demonstrate that the Plan has been positively prepared, supporting sustainable tourism initiatives that leverage the unique characteristics of rural areas and align with national Green Belt objectives.
83. In summary, Policy WS 4 (Part L), in its current form, does not deliver a comprehensive nor balanced approach to rural tourism and fails to support the needs of rural economies and communities and is therefore unsound. By making the recommended modifications, the policy would not only safeguard the Green Belt's integrity but also enhance the Green Belt's value to the Borough.
84. These changes would enable Policy WS 4 (Part L) to actively contribute to a vibrant, sustainable rural economy that aligns with both the NPPF and the Strategic Objectives of the Plan.

MM21- Policy WS 12 (Monitoring and Review)

85. Notwithstanding the multiple fundamental issues identified above – whereby there can be little doubt that the proposed MMs result in an unsound Plan, Leverhulme raises significant objections to this monitoring and review policy, which only aligns with national requirements for a review to be carried out within 5 years and, more importantly, introduces five factors that will be taken into account during such a review, which will place unnecessary conditions on a proper review being implemented.
86. First, the stipulation to monitor housing delivery against a 90% threshold of the annualised housing requirement introduces an overly rigid performance metric. By setting this threshold, the policy effectively builds in an undersupply cushion that would delay timely corrective measures to address a shortfall.
87. In comparison, a more responsive metric (such as a 75% threshold) would better align with national housing delivery goals and allow for swifter action to meet any arising

housing needs. Additionally, requiring three consecutive years of underperformance before considering a review is an excessively conservative approach that will further entrench housing undersupply.

88. Secondly, the five factors outlined under section B of the policy place undue limitations on the initiation and scope of a Local Plan review. Factors such as delays in funding, shifts in delivery timelines, or the review of the Liverpool City Region Spatial Development Strategy will unnecessarily restrict updating the Plan as circumstances change. Instead, the review process should remain adaptive, allowing the Council to respond to new information and changes in housing need or economic conditions without rigid conditions that will delay an otherwise necessary review.
89. We consider that for an early review policy to be effective, it must require the Council to commence immediate review of the plan upon adoption and require that an updated or replacement plan is submitted no later than three years after the adoption date of the plan.
90. If these timescales are not met, then the policies in the plan which are most important for determining planning applications for new housing should be deemed to be 'out of date' and the presumption in favour of sustainable development engaged as per the provision of the NPPF. A similar policy was included in the Bedford Local Plan 2030 (Policy 1), adopted January 2020, because of changes to national policies and a need to plan for higher housing numbers. In other words, the Bedford Local Plan recognised the direction of travel and the increased emphasis being placed on increasing housing supply, meaning a Local Plan review needed to be undertaken immediately after adoption.