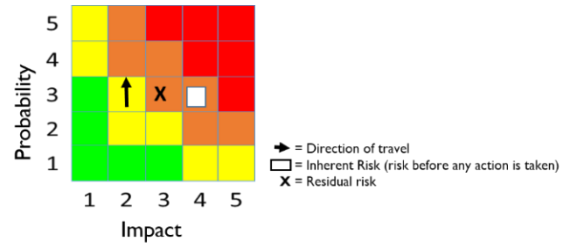


## Appendix B – South Downs Local Plan Review Risk Register

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Risk Number	Risk	Inherent risk (Probability/Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/Likelihood x Impact) (risk score after mitigations applied)
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<p>R1</p>	<p><b>Delay or changes to Government’s National Planning Reforms.</b>                  The Levelling Up and Regeneration Act 2023 (LURA) sets out the framework for a new plan-making system which will be introduced via secondary legislation. The intention was for the new planning system to commence in Autumn 2024 however this has been delayed. In addition, the transition date to the new system was initially any Local Plans submitted to the Planning Inspectorate after 30th June 2025, but the Government recently consulted on moving this date back to December 2026. This transition date is crucial to whether the South Downs Local Plan Review needs to accord with the existing plan-making system or the new one proposed in the LURA. If the December 2026 transition date is confirmed, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system. Submitting under the current system would present less risk than submitting under the new system, where much of the detail is yet to be made available. Timings are overall not certain as they are subject to various required legislation and policy changes and processes. Impact could be significant as existing Local Plan will be over five years old in July 2024 and its weight will start to diminish especially if the 5-year housing land supply is not maintained.</p>	<p>4x4 (16)</p>	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies.</li> <li>• Jointly raising concerns with other LPAs about relevant aspects of planning reforms.</li> <li>• Maintaining momentum on the Local Plan Review so we are ready to respond to any changes to transitional arrangements.</li> <li>• Starting with aspects of the Local Plan Review least likely to be substantially affected by the Planning Reforms – starting with land availability assessment, site allocations, development need, and other key pieces of evidence or assessments. Starting national park-wide thematic policy review later in the process to respond to any steer on NDMPs.</li> </ul>	<p>4x3 (12)</p>
<p>R2</p>	<p><b>Other changes to national policy or legislation.</b>                  In December 2023 the then Conservative Government revised the National Planning Policy Framework (NPPF) to be more flexible about Local Plans meeting housing need</p>	<p>4x4 (16)</p>	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies. This will assist in being ready to respond to any actions required in relation to relevant national policy or legislation changes and reduce</li> </ul>	<p>4x3 (12)</p>

	<p>figures. In July 2024 the new Labour Government published a consultation concerning further proposed revisions to the NPPF reversing these changes and strengthening the requirement for Local Plans to meet housing need figures and work cooperatively with neighbouring authorities to address any unmet needs. The consultation also proposed a new 'standard method' for calculating those housing need figures which significantly increased them. The changes to the NPPF are still draft, and a finalised version is expected by the end of 2024. However, the Written Ministerial Statement accompanying the proposals in July 2024 is a material consideration and clearly sets out the Government's agenda for growth, including the aspiration to deliver 1.5 million homes during this Parliament. Importantly, it should be noted that the proposed changes to the NPPF do not weaken the protections for National Parks in paragraphs 182 and 183. Various other changes to the planning system have been proposed such as changes to PD rights. There has also been Government interest in legislation and policy changes which may impact the planning system, such as proposed changes regarding nutrient neutrality and the Habitats Regulations. Various national policy or legislative changes that impact the Local Plan review are possible. Whilst these are likely to be topic specific compared with the overarching planning reforms referenced above, they could cause significant delay, especially if arising at later stages of the plan making process.</p>		<p>the impact on the Local Plan Review and its timetable.</p>	
<p>R3</p>	<p><b>Delays in completion of evidence studies and assessments.</b></p>	<p>3x4 (12)</p>	<ul style="list-style-type: none"> <li>• Communication of the Local Plan Review timetable and specific evidence studies.</li> </ul>	<p>2x3 (6)</p>

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
	Either internal studies or those being undertaken by consultants commissioned.		<ul style="list-style-type: none"> <li>Regular check ins on progress of evidence studies to identify delays and address these.</li> </ul>	
R4	<p><b>New or changing key issues arising for the Local Plan Review to address.</b>                      Arising from evidence studies, cross boundary working, or otherwise raised. For example, a new or changing Habitats Regulations Assessment matter that requires further evidence and/or a policy position in the Local Plan. These are likely to be relatively focused and topic specific matters. If this arises through evidence studies at the relatively early stages of plan making, then these can be more straightforwardly addressed without significant delay. There is greater risk at the later stages of the plan-making process which could cause significant delay.</p>	3x4 (12)	<ul style="list-style-type: none"> <li>Taking an appropriate balance in the timing of commissioning evidence – early enough to allow sufficient time for plan-making responses, but not too early to be incomplete or out of date.</li> </ul>	3x3 (9)
R5	<p><b>Changes in Members and associated direction of travel of corporate priorities.</b>                      This could result in revisions to policies and/or changes or new evidence studies after they have been completed. Some change in Members may occur (and is usual) but the extent of any changes or their implications are unknown. No significant local elections are expected</p>	2x3 (6)	<ul style="list-style-type: none"> <li>Induction of new members to the issues identified for the Local Plan, and early understanding of any changes in direction of travel on priorities.</li> </ul>	2x2 (4)

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
R6	<p><b>Staff resourcing changes.</b>                      (a) Changing officers in the core project team or supporting the Local Plan Review process.                      (b) Reduction in staff resource</p>		(a) Appropriate staff and budget resources are in place to deliver the Local Plan Review.	
R7	<p><b>Significant delays in response or objections from Statutory Consultees.</b>                      Comments from Statutory Consultees have significant weight in the plan-making process. However statutory consultees are also under significant resource pressure and may have limited or variable capacity to engage and input through the plan-making process.</p>	3x4 (12)	<ul style="list-style-type: none"> <li>Best efforts to engage with statutory consultees either directly or through existing officer groups to share information and receive input on the approach taken in the Local Plan Review. This may assist in reducing the likelihood and impact of any objections.</li> </ul>	2x3 (6)
R8	<p><b>Planning Inspectorate (PINS) delays following submission of the Plan.</b>                      This could result in a delay in the examination process and eventual adoption of the Local Plan. PINS are likely to be navigating a period of transition in planning reforms which could result peaks and logjams in the examination process.</p>	4x4 (16)	<ul style="list-style-type: none"> <li>Communication with PINS in regards the timetable of the Local Plan Review and in regards any actions SDNPA can take to support an efficient examination process.</li> </ul>	3x3 (9)
R9	<p><b>Devolution.</b>                      Local Authorities across Hampshire, West Sussex and East Sussex are exploring options for devolution. This could result changes to the governance structures which we will engage with during the Local Plan Review, and could result in new priorities or strategies for these areas.</p>	3x3 (9)	<ul style="list-style-type: none"> <li>Keep a watching brief of devolution proposals and progress locally.</li> <li>Engage with relevant parties to ensure understanding of any changing priorities.</li> </ul>	3x2 (6)

KEY TO PROBABILITY / LIKELIHOOD AND IMPACT

LIKELIHOOD

Almost certain – 5  
Likely – 4  
Possible – 3  
Unlikely -2  
Almost impossible – 1

IMPACT

Catastrophic - 5  
Significant – 4  
Moderate – 3  
Minor – 2  
Insignificant - 1

OVERALL SCORE FOR SEVERITY

1-3 - Insignificant  
4-6 - Moderate  
7-12 - Significant  
13-25 - High