

Appendix A

Hull City Council

Local Plan Timetable

Timetable for the update of the Development Plan for Hull.

April 2024

1. What is the Local Plan Timetable?

- 1.1 This Local Plan Timetable (similar to the former local development scheme) sets out the Council's projected timetable for preparing key planning policy documents. This ensures local communities and other interested parties can understand the plan making activities that are intended to be undertaken by the Council and keep track of progress. The plan making process can be complicated and difficult to navigate for non-planners. Wherever possible non-technical language is used but where this is unavoidable the document seeks where possible to explain the meaning of it.
- 1.2 A Local Plan Timetable is required under Planning Law. This must specify matters to be dealt with in the local plan. The Act sets these out as:
- the matters which the authority's local plan for their area is to deal with,
 - the geographical area to which the authority's local plan is to relate,
 - any supplementary plans which the authority is to prepare,
 - the subject matter and geographical area, site, or sites to which each of those supplementary plans is to relate,
 - the authority propose to comply with the requirement in section 15F(1) (requirement in relation to design code),
 - a timetable for the preparation of the authority's local plan for their area, and any supplementary plans the authority are to make, which is consistent with this Part and any regulations made under it.
- 1.3 Each of these requirements is addressed through this document. It is referenced later in the document how plan making is in a state of transition and so this Local Plan Timetable is drafted with a view to be updated as and when more clarity is received from Government as to how a revised Plan Making system will be implemented.
- 1.4 An update will also address how Supplementary Plans will be produced when it is clearer how these could be used as a planning tool and what relationship these have to existing Supplementary Planning Documents.
- 1.5 The Council is bound to introduce a Design Code(s) for the city. Several design guides and design related appraisals exist, and work is currently underway to understand how these could form part of a Design Code. At this stage it is not clear how this will factor into the stages of Local Plan production although the intention is for the revised Local Plan to still include an overarching design policy and that a separate strategic design framework will be produced alongside the plan. It has been made clear nationally that

Design Codes will be produced within a Supplementary Plan and not therefore within the Local Plan document itself.

2. The Development Plan

- 2.1 The statutory 'Development Plan' for the city currently comprises several different documents as outlined below:
- 2.2 The adopted **Hull Local Plan** sets out a vision and a framework for the future development of the city, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. The plan provides development policies and allocations for the whole city. The current Local Plan, adopted in November 2017, comprises a written statement setting out a broad range of policies and related planning priorities and a city-wide policies map (including a city centre inset).
- 2.3 The **Kingswood Area Action Plan (AAP)** guides the development of this major growth area of the city, setting out a clear delivery framework for some of the important infrastructure requirements as well as phasing of some of the housing development elements. The local plan reflects this AAP within its policy map, but makes clear how land supply, town centre roles etc can be considered in relation to the city as a whole. The AAP, which was adopted in 2016, remains an adopted Plan and therefore must be considered as a part of the Development Plan as a whole for the city until such time that it is superseded, for example through update of the Local Plan.
- 2.4 The **Holderness Road Corridor (HRC) AAP** (adopted 2009) and the **Newington and St Andrews (NaSA) AAP** (adopted 2010) were created largely to steer and provide a framework for housing market renewal activities within certain areas of the city. They were produced ahead of the Local Plan which in turn superseded and updated most parts of these AAPs. Some elements are 'saved' and the Local Plan lists these within an appendix. These elements remain material considerations in determining planning applications in these areas.
- 2.5 The **Hull and East Riding Joint Minerals Local Plan** was adopted November 2019 and remains up to date and is not being reviewed as part of the wider Local Plan update process.
- 2.6 The **Hull and East Riding Joint Waste Local Plan** was adopted November 2014. It is intended that in Hull the policy framework for waste will be incorporated within the broader policy mix of the single Local Plan. It is likely that in the East Riding a separate dedicated Waste Local Plan will be produced. Both Councils are committed to working together to ensure a

complimentary approach to waste planning exists across the two authorities, informed by a shared evidence base where required.

- 2.7 Neighbourhood Plans provide local communities with an opportunity to create a shared vision for the future development and growth of their area. Such plans need to be in broad conformity with national planning policy and with the policy established locally in the development plan. Once adopted, they become part of the wider development plan for the area.
- 2.8 The Newington Neighbourhood Plan was adopted in 2023. This plan is centred on Anlaby Road between West Park and the Anlaby Road / Boothferry Road roundabout. It builds upon some of the approaches included within the NaSA AAP but adds a layer of detail acknowledging local priorities and needs. To date, this is the only Neighbourhood Plan in the City.
- 2.9 The Council will continue to be proactive and positive about neighbourhood planning, working collaboratively with communities where they choose to prepare a plan, and to ensure complementary neighbourhood and local plan policies are created. Further guidance on neighbourhood planning can be found on the Locality website and on the Council's website.

3. Local Plan Update

- 3.1 National planning policy requires local plans to be kept up to date, recognising that different policies will age at different rates (potentially requiring a partial update).
- 3.2 The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, which came into effect in April 2018 set the current regulations for plan making. They set a period within which an authority should undertake an assessment of whether its plan is up to date. This would need to be completed within five years of the adoption of the relevant local plan document. For the current local plan, an initial review of the need to update it was completed by November 2022. It has been decided that those parts of the Kingswood Areas Action Plan that remain relevant will be incorporated into the Local Plan. Other area action plans are already largely superseded with some policies retained within the current local plan, but consideration will need to be given to the future of these retained policies.
- 3.3 In addition to the above, the Levelling Up and Regeneration Act sets out the Government's intentions for major changes to the Plan Making system in its consultations and subsequent statements. These changes are largely all subject to secondary legislation. The government has also stated its intention for a transition period between the current and proposed new plan making system. A key element of this for the LP timetable is that for a Local Authority to continue to progress plan production under the current regulatory

framework, plans would need to be submitted by June 2025. Beyond this, if plans are not submitted, LPAs will be required to transition to the new system. The revised timetable indicates that this target will not be achieved (i.e. submission is anticipated in June 2026). The new regulatory framework for plan making is not expected to be published until Autumn 2024 and so the current timetable has had to make some assumptions as to how later phases will proceed. An update of the timetable will be required as soon as new regulations are published and further clarity emerges.

- 3.4 This update will focus on the Hull Local Plan. As part of this process, it is intended that the relevant parts of the adopted Kingswood Area Action Plan (AAP) and of the retained parts of the other two AAPs will be subsumed within this single document. A decision has been taken not to prepare a new Joint Waste Plan but to deal with relevant waste matters through the update of the Local Plan. The Joint Minerals Plan was adopted relatively recently and there is no intention to update this at the moment.
- 3.5 There are several factors that have emerged from the initial review of the plan, and other key drivers, that indicate a need for an update of the Local Plan as outlined below.
- 3.6 National planning policy has changed since the plan was adopted. The Government published a new version of NPPF in December 2024 (first published March 2012 and updated July 2018, and February 2019 and July 2021).
- 3.7 Some interim and incremental changes have been made to the planning system in the wake of the government publication of proposals for more wholesale change. These do bring clear pressure for update of policies, with changes to the national methodology for establishing housing requirements (this did not exist during preparation of the current local plan), and major change to the Use Class Order bringing greater flexibility for change amongst town centre uses and consequential change to the approach to managing these uses.
- 3.8 The Council has declared a Climate Emergency since the adoption of the Local Plan, and it is therefore critical that the Local Plan is able to fully support the objectives of strategies and projects specifically targeted to achieving mitigation measures and carbon reductions. The threat of legal challenge has been highlighted where emerging Local Plans in other authorities have failed to satisfactorily facilitate carbon reduction targets established in local strategies.
- 3.9 The Environment Act became law in November 2021. While this is designed partly to ensure certain elements of European law pass into UK Law, there are important new requirements that impact on Planning, including the need

to achieve Biodiversity Net Gain through development, and new Local Nature Recovery Strategies are likely to influence decision making. Consideration will need to be given to how policies align with the full requirements of the Act.

- 3.10 As referred to earlier, the approach to calculating housing need has changed. While this is unlikely of itself, to lead to significant change to the annual housing requirement, as this continues to be rolled forward over future years the amount of available land within the city will continue to present a challenge to finding suitable sites for development.
- 3.11 There are key economic challenges for the city as the roles of centres change and as the city continues to embrace the needs of existing and new industry. The City Plan, and Economic Strategy require the support of a strong and up to date planning framework. The introduction of Freeport status brings new opportunity, as does scope for new Investment Zones to be introduced in the city. The inevitable impacts of the recent pandemic may lead to more permanent restructuring of peoples work and leisure choices with consequences for future land use and development.
- 3.12 The Local Plan has been subject to ongoing monitoring as reported through the Authority Monitoring Report, and lessons have been learnt through practical experience of implementation about how successful policies, allocations and designations have been. This includes for example the HMO policy; whether lower (or variable) thresholds should be introduced, relationship to building regulations and how standards can be sought through policy where this impacts on viability of development, and how to achieve parking standards in the face of competing priorities. The Council intends to produce a new Supplementary Planning Document dealing with HMOs which will provide an updated and interim position pending the adoption of a new local plan.
- 3.13 Since the plan was adopted close work with public health has identified the need for the plan to go further in supporting the wellbeing of the community to ensure new development is located at the most suitable locations in terms of service access, but also to ensure that issues that impact on health such as access to healthy food and open space are fully addressed. Consideration should be given to including the need for Health Impact Assessments within the plan.
- 3.14 The Kingswood AAP has been reviewed to determine the need for update. It was agreed by Planning Committee that due to the significant amount of development that has now occurred at Kingswood there are only parts of the AAP that remain relevant, and it is now appropriate to move these parts within the city-wide Local Plan.

- 3.15 At the time the Local Plan was adopted, certain policies from the former HRC and NaSA AAPs were retained, and the plans no longer stand as separate parts of the Development Plan. Tables A3 and A4 of the Local Plan set out which of the policies in the two AAPs are retained in whole, or partially and which ones were deleted. Rather than continue to refer to these as retained policies in the Local Plan appendix it is appropriate to integrate what remain within the broader city-wide policy and allocation framework of the Local Plan.
- 3.16 The Council has recently produced a Community Plan which is a 10-year vision for the city which sets out the following shared ambitions:
- safe and welcoming neighbourhoods
 - a healthier and fairer Hull
 - reaching our potential
 - economic growth that works for all
 - responding to the climate and nature emergency
 - our culture, our heritage, our city

These are all matters which already feature strongly in the Local Plan but will need to be integrated more fully as part of the update of the plan.

- 3.17 There are clearly several factors that are already driving a need to update elements of the Local Plan. This is not to say however that all parts will need to be updated as there are also policies, allocations and designations that remain relevant and up to date. Therefore, the initial scoping of work suggests updating only parts of the Local Plan rather than a comprehensive redrafting of the plan.
- 3.18 It is considered that enough evidence exists to be clear that an update of the plan is required, and work should therefore be undertaken to do this. The normal plan making process will continue to assess where further changes will be required, as new evidence emerges, and through consultation. So, the process will be iterative with further review of how the plan should be modified, alongside active drafting of revisions to produce a new updated Local Plan.
- 3.19 A key test of the soundness of the local plan is that its policies are based on up-to-date and robust evidence base.
- 3.20 A large evidence base was prepared to inform the current local plan and it is necessary to update elements of this. There are also new and emerging

issues that an update of the plan will need to address, and the scope of evidence required will therefore change to accommodate these.

- 3.21 Ongoing monitoring referred to above has already updated some elements of evidence, particularly around development rates and land availability. The production or update of Council and other strategies has also required new evidence to be produced, or updates to existing, and this will also potentially inform preparation of the revised plan.
- 3.22 The Council's website provides details of the evidence that is being produced to inform the plan. This will continue to be updated.

4. Sustainability Appraisal

- 4.1 Each stage of producing the Local Plan update will be informed by a Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA), and a separate Habitats Regulations Assessment (HRA). This will ensure that policies in the Local Plan reflect sustainable development principles and consider the economic, social, environmental and resource effects of any development. A revised Scoping Report will be required to inform the SA objectives that will guide update of the Plan.
- 4.2 The Governments Planning White Paper referred to a need to replace the current SA process that Government considers is over burdensome. The White Paper suggests requirements for environmental assessment and mitigation need to be simpler to understand and consolidated in one place so far as possible. The intention is still to fulfil obligations for environmental protection and enhancement established through legislation so it is likely that the underlying evidence requirements will still be required albeit in simpler form.

5. Wider Stakeholder Involvement

- 5.1 The Council is currently bound by a Duty to Co-operate which requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities, and to have regard to the activities of other prescribed bodies on planning for strategic matters that impact across local authority administrative boundaries. Processes are in place and will be maintained to ensure the Council continues to satisfy the requirements of the Duty. The LURA repeals the statutory duty to cooperate, and a new "Alignment Policy" is proposed to be brought in through amendments to the NPPF. Where plans are being progressed under the old system the duty to cooperate will still apply.
- 5.2 Despite the uncertainty surrounding the new 'alignment policy', the Council remains committed to working closely neighbouring authorities and others, as

it did over many years prior to the Duty to Cooperate being introduced. This applies also to ensuring that residents and other interested parties are kept fully informed of progress in plan making.

- 5.3 The compact nature of the city's administrative area and single shared administrative boundary with the adjoining East Riding of Yorkshire points clearly to the important inter-relationship between these two areas. Hull has a history of successfully working with the East Riding of Yorkshire on a range of cross boundary planning matters, hence the previous publication of a Joint Planning Statement, and the focus now on the Statement of Common Ground, to ensure it reflects the strategic planning position of the two authorities and ensures Local Plan policies reflect that broader strategic framework. These will be reviewed and updated as the plan develops to address changing circumstances.
- 5.4 The Council continues to abide by the requirements of the Joint Strategic Planning Protocol which means that each authority consults the other on strategically significant planning applications. This helps to ensure that the shared priorities of both authorities are supported when determining such applications.
- 5.5 A central part of the LURA is devolution, enabling the formation of Combined / Mayoral Authorities. Whichever form this might take in the area, the LURA refers to the ability to create joint Spatial Development Strategies. Such a decision would impact on the scope of a Local Plan for the city and the associated timescale. At present both authorities are focussed on preparing separate plans, but it may be that in the future further joint working may lead to an alternative approach.
- 5.6 The Local Plan presents a means of implementing the Council's key strategies and those of its partners through the development and use of land across the city. Hull City Council has produced a new Economic Strategy for the city. The Hull and East Yorkshire LEP has produced an Economic Growth and Workforce Wellbeing Strategy. Other relevant strategies include Hull Climate Emergency; Hull City Plan; Hull Housing Strategy; and Health and Well Being Strategy.

6. Project Management

- 6.1 The stages of plan making are prescribed by national regulations, and these largely drive the project timetable, determining the scope of each stage and setting out the specific time frames – for example for formal consultation.
- 6.2 The broad stages of plan preparation are set out in the following table and a time frame for when each of those stages will take place is provided in Figure 1.1

Table 1. Plan making stages

| Stage | Description of Process | SA/SEA Stages |
|--|---|---|
| 1. Pre-production (Regulation 18) | Scope out the need for and collect evidence, seek views, ideas and information on the issues that update of the local plan will address. | Establish scope for SA/SEA |
| 2. Plan Production – ‘Draft Plan’ (Regulation 18) | Using evidence gathered prepare and publish a draft plan. Consultation on this document for a statutory minimum period of six weeks. Prepare a Consultation Statement. Consider any significant changes in policy and comments made. | Prepare an interim SA/SEA and consult on this alongside local plan. |
| 3. Publication of the submission Local Plan (Regulation 19 and 20) | <p>When we have gathered sufficient evidence and considered fully comments received in earlier consultations we will prepare and publish a Proposed Submission Document</p> <p>Carry out consultation on this document for a statutory minimum period of six weeks, when people can comment on the Plan, the SA/SEA and supporting evidence, and where we will seek views on whether the document is legally compliant and so considered ‘sound’. Consider any comments made and may propose further amendments to the plan before submitting it to the Secretary of State.</p> | Prepare the SA/SEA report and publish for consultation seeking representations. |

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|--|---|--|
| <p>4. Plan submission and Examination in Public (Regulation 22, 23 and 24)</p> | <p>The plan is submitted to the Secretary of State for an Examination in Public by the Planning Inspectorate.</p> <p>An Examination will take place, usually involving hearing sessions, during which the Inspector will judge whether the plan is adequately evidenced, positively prepared with the appropriate stakeholders and public engagement, justified, effective and in line with national policy, legally compliant and sound.</p> <p>Following the Examination, the Inspector will, either issue a report indicating whether the plan is 'sound' or not, or, if appropriate and agreed by the Council, propose changes (known as 'Main Modifications') to the plan that the Inspector considers are necessary to make it sound. The Main Modifications are then consulted on, and representations are sought on the suggested changes. The Inspector and the Council consider any representations received on the 'main modifications', changes are incorporated into the final plan. The Inspector issues a report that recommends that the plan is either: adopted; adopted with modifications; or not adopted.</p> | <p>Submit report alongside the local plan.</p> <p>Examination of SA/SEA report to inform the wider Examination of the local plan.</p> <p>Depending on scope of any Main Modifications recommended by the Inspector further SA may be required.</p> |
| <p>5. Adoption of the Local Plan. (Regulation 36)</p> | <p>If the plan is found 'sound' the Council will consider adopting the plan; the final decision will be made by Full Council.</p> <p>Plan adopted by Hull City Council and published on the Council's website.</p> <p>Prepare an Adoption Statement.</p> <p>6 week period in which anyone can make a legal challenge to the Plan and its production at the High Court.</p> | <p>The local authority must make the sustainability appraisal report available after the local authority has adopted the plan.</p> |

| | | |
|--------------------------|--|--|
| 6. Monitoring and Review | The Plan is monitored to make sure policies are working and the aims of the Plan are being achieved. Monitoring is primarily made through the Council’s annual Authority Monitoring Report. The Plan will be reviewed to determine a need to update any parts as necessary within 5 years. | Post adoption monitoring of significant environmental effects of implementing a plan |
|--------------------------|--|--|

6.3 The LURA itself does not prescribe timescales for plan making as these are to be brought forward in separate regulations, however, the government’s July 2023 consultation on the implementation of plan-making reforms (2023 Consultation) indicates that LPAs will be required to prepare and adopt a plan within 30 months (significantly faster than the current average of 7 years [1]) and to start work on new plans by, at the latest, 5 years after adoption of their previous plan.

6.4 The 2023 Consultation identified the following key stages in the new plan making regime:

- Scoping and early participation – including requirements to: “notify” the public and stakeholders including statutory bodies and “invite” participation; prepare or update the timetable; and give a minimum of four months’ notice before LPAs intend to formally commence the 30-month plan preparation timeframe (starting with the first gateway advisory assessment – see below on the gateway assessments).
- Plan visioning and strategy development – including the first formal public consultation (to last 8 weeks) on the plan.
- Evidence gathering and drafting the plan – preparation of evidence to demonstrate soundness of the plan and will include the second advisory gateway assessment.
- Engagement, proposing changes and submission of the plan – including the second public consultation on the plan (to last 6 weeks) and undertaking the third gateway assessment which is a stop/go decision point.
- Examination – 6 months (plus an additional three months if further consultation is needed).
- Adoption.

6.5 Government proposes three mandatory gateway assessments. Gateways 1 and 2 are intended to be advisory only and gateway 3 is to be a stop/go check pre-examination.

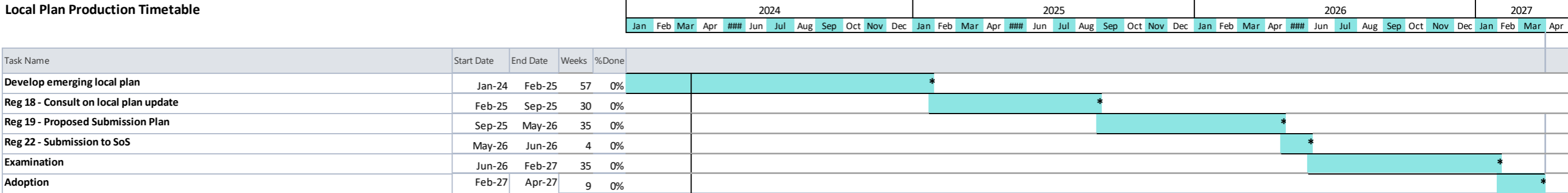
- Gateway 1 will be assessed by “independent, specialist hands-on support” and may involve planning inspectors. The focus is to ensure the plan is setting off in the right direction and to support the early identification of potential issues including legal and procedural requirements and soundness.
- Gateway 2 will be assessed by planning inspectors and (optionally) supported by technical specialists. The focus is to support the early resolution of potential soundness issues, where possible, and ensure legal and procedural compliance and monitor and track progress.
- Gateway 3 will be assessed also by planning inspectors and the focus will be on validating key requirements so the plan can move to examination (together with ensuring legal and procedural compliance and monitoring and tracking progress).

6.6 These changes will inevitably bring different pathways and stages to plan making although many of the activities have the same broad objectives regards evidence collection, plan drafting and consultation. The key element to reflect is the overall timeframe for production which would effectively be 30 months from when the new regulatory framework is in place, i.e. autumn this year, and to ensure that preparations are made in the interim to ensure work under the new system could proceed at pace.

6.7 In practice and given the stage that has been reached in relation to reviewing the Local Plan, it is considered that the two processes (i.e. the current and proposed planning system) are likely to result in a similar outcome in terms of timescale. The Council will however need to remain vigilant in terms of the fine detail that emerges which will inform the new system. There is little alternative but to carry on reviewing in accordance with prevailing legislative requirements but inevitably (and assuming the proposed amendments to the system are progressed) this will transfer over into the new system in due course.

Figure 1.1

Local Plan Production Timetable



7. Resources

- 7.1 The Local Plan seeks to articulate the City Council and other's priorities identified in the strategies and documents outlined earlier, where these impact on or can be implemented through the plans spatial vision, objectives, and policy framework. Whilst the core responsibility for plan making will rest within the Planning Service, resources (both staff and financial) will need to be drawn from across the City Council to prepare and implement the local plan. Close working with a range of stakeholders and partners will also be an important feature of the preparation of the local plan.
- 7.2 The LURA repeals the statutory Duty to Cooperate, and a new "Alignment Policy" is proposed to be brought in through amendments to the NPPF. Where plans are being progressed under the old system the duty to cooperate will still apply. The Duty to Cooperate requires close collaboration between local authorities and specified public bodies on planning for strategic matters that impact across local authority administrative boundaries.
- 7.3 There are important established relationships that help to support and inform plan making such as officer and member meetings between Hull and East Riding of Yorkshire and similar arrangements at the sub regional level such as the York, N Yorkshire, East Riding and Hull Heads of Planning group. Other 'thematic' groups such as the Living with Water (LWW) partnership which plays a key role in water management in the city and its surrounding catchment areas are of direct relevance. The LURA does place a requirement to involve statutory bodies in plan making.
- 7.4 A Local Plan Forum has previously been used to engage the support and input of people with interests in plan making. It is intended that this be reconstituted as an early priority in the process of updating the plan.
- 7.5 The Planning team will also actively engage with Neighbourhood Teams and Ward Forums as a source of local issues and views as to potential solutions. Neighbourhood planning is undertaken by members of the community but with planning support by the Council to ensure conformity with the Local Plan.
- 7.6 Subject to the availability of resources, the nature of technical work to be undertaken and the requirements of specific timetables, external consultancy support is also likely to be required. The intention wherever possible will be to use in-house resources and only to resort to consultancies where work is of a specialist technical nature or where resources do not otherwise exist.
- 7.7 The use of digital technology will be maximised to bring as much efficiency as possible to the plan making process. This will also be used to maximise community and stakeholder engagement in the process and meet

government objectives for digitising planning. The Statement of Community Involvement provides greater details on digital engagement.

8. Risk Assessment

- 8.1 Priorities for the Government are to progress plan-making quickly, reduce red tape and save money, whilst promoting an effective and efficient planning system that stimulates investment, enterprise, and community engagement.
- 8.2 Meeting demanding and on-going budget reduction targets remains an overall challenge for the City Council as a whole, in the delivery of its strategic objectives and priorities, including the preparation of the local plan.
- 8.3 The transition to a new planning system inevitably brings a level of uncertainty, especially as provisions of the LURA are dependent on further regulations, policy, and guidance changes before they can be implemented. This therefore brings an inherent level of risk to maintaining a relatively tight schedule where adjustments are required to accommodate these changes.
- 8.4 An important aspect of managing risk in this period will involve effectively managing change. It is vital that Members of the Council and senior officers are kept abreast of the process and of the importance of producing an update to the Plan. This document is key in helping to build awareness of what is involved in reviewing the plan and reinforcing the message.
- 8.5 A key risk at the current time surrounds uncertainty as to the potential shape of plan making following Devolution and the creation of a Mayoral Authority for Hull and East Riding. There will also be a general election this year and the outcome of that could significantly impact plan making going forward. Nationally, current opposition parties have stated their own views as to changes needed to the planning system.
- 8.6 A detailed risk assessment is presented at Table 2 below:

Table 2

| Risk | Impact | Mitigating Actions |
|---|--|--|
| <p>Planning Policy Team loses staff and fails to recruit replacement. Including through budget cuts or delays in the procurement / recruitment process.</p> | <p>Slippage or hold up to programme</p> | <p>Ensure political and corporate understanding of the importance of the plan for the city’s future and therefore the need to progress production to the agreed timetable.</p> |
| <p>Changes to national planning policy or guidance – or planning & environmental legislation.</p> | <p>Additional work or changes to existing work – potential delays to comply with new requirements.</p> | <p>Maintain up to date view of emerging legislation and guidance.</p> <p>Act at the earliest opportunity to respond and influence where possible (e.g. consultations) – but also to communicate impacts to decision makers and manage expectations re the plan making schedule.</p> <p>Strong local evidence required to allow deviation from national policy.</p> |
| <p>Volume of work greater than anticipated – e.g. higher than expected level of comments received at consultation stage.</p> | <p>Potential slippage in programme.</p> | <p>Ensure that timetable is realistic and expect to provide sufficient time for meaningful engagement.</p> <p>Procure tools to properly manage representations to ensure they don’t become</p> |

| Risk | Impact | Mitigating Actions |
|---|---|--|
| | | over burdensome to process. |
| Capacity of stakeholders to respond as part of engagement activity. | Potential slippage to programme | Early consultation with stakeholders where appropriate. |
| Evidence base work takes longer – expands in scope. | Potential slippage to programme | Set robust brief when planning / procuring work. Ensure adequate resource is allocated |
| Diversion of resources including staff for other priorities | Potential slippage to programme | Ensure plan making remains a corporate priority. Ensure clear roles established for those whose primary purpose is producing the Local Plan. |
| Joint working with other internal directorates. | Potential for conflict of priorities Confusion / conflict of objectives. | Need for senior management to be clear of the plan making process and the role of the Local Plan in the achievement of wider objectives. Educate and manage expectations of what the plan can achieve – the scope and timeframe and ability to absorb the goals and objectives of emerging strategies from different departments. |
| Joint working with external bodies / other local authorities. | Potential slippage to programme | Engage with outside forums and partnerships to ensure the Council maintains a voice. |

| Risk | Impact | Mitigating Actions |
|--|--|---|
| | | Statements of Common Ground and Duty to Cooperate. |
| Lack of in-house skills | <p>Potential slippage to programme</p> <p>Potential impact on the quality and soundness of planning documents.</p> | <p>Ensure adequate and timely training is provided to members of the team for tasks to be undertaken.</p> <p>Be clear what external support is required to achieve objectives.</p> |
| Local Plan timetable is too ambitious. | Key milestones in programme not met. | <p>Ensure LDS is realistic.</p> <p>Monitor progress against the LDS.</p> |
| Insufficient budgetary provision to finance the project. | <p>Work cannot be progressed to programme or must be paused.</p> <p>Objectives on quality compromised.</p> | Budget / cost to be kept under review and importance of the Local Plan review to be made clear within business planning. |
| Planning Inspectorate unable to meet the timescale for examination and report. | <p>Delay to examination / reporting.</p> <p>Key programme milestones not met.</p> | Close liaison with the Planning Inspectorate to highlight any potential issues at an early stage. |
| Submitted document fails test of soundness or duty to cooperate. | Document cannot be adopted without additional work. | <p>Ensure the development plan is sound, constructed on a robust evidence base with sustainability appraisal and well audited community and stakeholder engagement.</p> <p>Maintain joint working arrangements and proactively engage with Local Plans for neighbouring local authorities. Consider</p> |

| Risk | Impact | Mitigating Actions |
|-----------------|---|---|
| | | the need for external health check prior to submission of a document. |
| Legal challenge | <p>Adopted document quashed.</p> <p>Additional work required.</p> | <p>Ensure relevant legislation and regulations etc. are complied with.</p> <p>Close working relationship with legal support throughout process of production.</p> |