

## **City of Bradford Metropolitan District Council**

## **Local Development Scheme (Revised)**

For the period 2024 to 2026

13 March 2024

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#### 1.0 INTRODUCTION

## 1.1 Background

- 1.1.1 The Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and more recently, the Levelling-Up and Regeneration Act 2023, provides the legal basis for the preparation of the Local Plan. A key requirement of the 2004 Act is the need for clear and transparent programme management through the preparation of a Local Development Scheme (LDS).
- 1.1.2 The purpose of the LDS is to set out the development plans documents to be produced and their programme for preparation for a three-year period. Guidance requires the LDS to be reviewed on a regular basis (at least every 3 years) to take account of progress and slippage on any documents and new policy issues.
- 1.1.3 The current LDS was approved by the Council in July 2021. It set out the programme for the period 2021 to 2024.
- 1.1.4 Since the LDS was approved, there has been significant progress to put in place up to date comprehensive Local Plan coverage with the development of a single plan integrating site allocations. There has been slippage against the milestones in the LDS as the Council has considered, significant further national changes to the planning system and changed approach working towards a single plan.
- 1.1.5 In light of the national planning reforms and also local circumstances and progress the Council have reviewed and updated the LDS. The revised LDS will cover the period 2024 to 2026.

## 1.2 The Development Plan System

#### Local Plan

- 1.2.1 The current Development Plan System was established in the Planning and Compulsory Purchase Act 2004. It has subsequently been amended by a range of other legislation including The Localism Act and more recently the Levelling Up and Regeneration Act 2023.
- 1.2.2 The Local Plan for Bradford District currently consists of a portfolio of Local documents which provide the framework for delivering the spatial planning strategy for the area. There are two main types of Local Plan Documents Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs):
- 1.2.3 <u>The Development Plan Documents</u> form part of the statutory development plan and are the subject of a Public Examination by an independent Inspector. DPDs form the statutory development plan for the Bradford District and will be the start point for the consideration of planning applications.

1.2.4 The Supplementary Planning Documents are non-statutory documents that supplement policies and proposals contained in a Development Plan Document. For example, they may provide more detail to a DPD or may focus on developing a brief for a site. All SPDs will be the subject of public consultation but not a public examination.

## **Local Plan Reforms**

1.2.5 There have been significant reforms to the Planning system which have had implications for the Development Plan system and added in new documents and changes to the process.

#### **Localism Act 2011**

- 1.2.6 The Localism Act introduced, new provisions which open the opportunity to local communities to take up new decentralised powers to take responsibility and accountability to shape their areas. A number of these related to the role of communities in shaping development and growth in their communities. A package of non mandatory neighbourhood planning tools are available for use by local communities should they choose to use them. One of these is the preparation of Neighbourhood Plans.
- 1.2.7 Neighbourhood planning tools can only be used by relevant qualifying bodies. A "qualifying body" means a Parish or Town Council, or an organisation or body designated as a neighbourhood forum, authorised to act in relation to a neighbourhood area.
- 1.2.8 The broad focus of a Neighbourhood Plan is flexible and can range from setting out more detailed policies for their community over and above the Local Plan to starting to shape the choices over the use of land and the designation of land for housing, employment, community uses etc. It's important that Neighbourhood Plans should not promote less development than set out in the strategic (local plan) policies for the area or undermine those strategic policies¹. Neighbourhood Plans cannot deal with matters such as minerals and waste.
- 1.2.9 The process for preparation of a Neighbourhood Plan is set out in regulations<sup>2</sup>. The qualifying body can then prepare a plan in consultation with their communities, business and to her interest groups.
- 1.2.10 Once a Neighbourhood Plan has been prepared by the qualifying body, it is submitted to the council who publish it for formal representations and appoint an independent examiner to check that it meets the right basic conditions including general compliance with the strategic policies within the Local Plan for the district.
- 1.2.11 If the plan is deemed acceptable following the examination by an independent examiner and endorsed by Council's Executive for a public referendum. A referendum will be held

<sup>&</sup>lt;sup>1</sup> NPPF para 29 and footnote 16 - Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

<sup>&</sup>lt;sup>2</sup> The Neighbourhood Planning (General) Regulations 2012 (legislation.gov.uk)

- and if a majority vote in favour is secured, and the neighbourhood plan is subsequently formally made through a Decision Statement by the Council's delegated senior officer and portfolio holder, the plan will become part of the overall development plan for the District.
- 1.2.12 The Localism Act also amended the procedure for preparation of the Local Development Scheme and the Annual (Authority) Monitoring Report.

## Levelling Up & Regeneration Act 2023

- 1.2.13 The Levelling Up & Regeneration Act 2023 amongst other things has a stated aim of putting in place a faster and less bureaucratic planning system. To this end the government proposed changes to standardise the process for local plans, so that they are produced more quickly, simpler to use, more democratic, and as up to date as possible. It reaffirmed the importance of the local plan and the need to ensure all local planning authorities have in place up to date plans.
- 1.2.14 The Act introduces a new category of planning policies: national development management policies (NDMPs) to be drawn up by the Secretary of State for Levelling Up, Housing and Communities (DLUHC). The Secretary of State must consult the public on proposed NDMPs.
- 1.2.15 In terms of the local plan documents produced by Councils, the government has proposed changing the Local Plan regulations to require LPAs to produce local plans within 30 months and update them every five years. It proposed that, in these 30 months, local plans would undergo:
  - two rounds of consultations to allow the local community and certain public bodies to participate in the plan-making process.
  - three 'gateway' checks (of four to six weeks each) where technical specialists or planning inspectors would help LPAs resolve issues.
  - The government also proposed that the examination of the local plan by the Planning Inspectorate should take place during the 30-month timeframe. It said the examination should last "no more than six months".
- 1.2.16 The Levelling Up and Regeneration Act 2023 also makes other changes to planning law which affect the plan-making process and decision-making on planning applications. They include:
  - Abolishing the 'duty to cooperate', which requires LPAs to cooperate with each other in preparing their local plans. The government said that it will introduce a new 'flexible alignment policy' instead.
  - Replacing supplementary planning documents (SPDs) used to expand on policies in local plans) with 'supplementary plans. Their scope would be limited to setting either site-specific policies or area-wide design codes.
  - Introducing a statutory requirement for LPAs to prepare design codes, in which they set out design requirements for developments in their area.

1.2.17 The government have set out transitionary arrangements ahead of the new style local plans being developed and allows for authorities well advanced to continue to submission, examination and adoption under the 'old' legal process. Plans progressing under the 'old' style have until June 2025 to submit their plans to Government for Examination and adoption by end of 2026.

## **National Planning Policy Framework (NPPF)**

- 1.2.18 Guidance on the preparation of Development Plan Documents is contained in the National Planning Policy Framework (NPPF). The NPPF is supplemented by more detailed advice in the web based National Planning Practice Guidance (NPPG).
- 1.2.19 The NPPF reinforces the primacy of the development plan. The presumption in favour of sustainable development makes clear the need for an up to date and robust Local Plan in line with NPPF.
- 1.2.20 It makes clear that each local planning authority should produce a Local Plan for its area. Any additional development plan documents should only be used where clearly justified. Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery and should not be used to add unnecessarily to the financial burdens on development. Though note the changes which replace with new Supplementary Plans.

## 1.3 The Purpose and Content of the Local Development Scheme

- 1.3.1 The Planning and Compulsory Purchase Act (2004), the Planning Act (2008), the Localism Act (2011), Levelling-Up and Regeneration Act 2023 and the National Planning Policy Framework (NPPF), supported by the Local Planning Regulations 2012 (as amended) set out the current requirements for plan making by local authorities and the key requirements by which the LDS will be prepared.
- 1.3.2 The LDS has three main purposes:
  - to describe the Development Plan Documents (DPD) which the Council intends to include as part of its Local Plan (both existing and proposed);
  - to explain their relationship to other DPDs in the Local Plan; and
  - to set out the timetables for producing DPDs.
- 1.3.3 The Council's first LDS was brought into force in June 2005 with subsequent updates in 2007, 2014 2018 and 2021. The LDS provides summary details of the nature and content of each document, the geographic area to which each document relates, the interrelationship between documents and the timetable for their preparation. (More details are provided in sections 4 5 below.)
- 1.3.4 The progress in delivering the LDS programme is reviewed annually through the Authority Monitoring Report (AMR). This will identify progress against the key milestones and highlight any new issues. The information gathered will form part of the

evidence base that is used to review whether any changes are required to the Local Development Scheme.

## 1.4 Stakeholder and Community Involvement

- 1.4.1 A key objective of the planning system is to strengthen community and stakeholder involvement in the preparation and revision of Local plans. The LDS programme therefore allocates time for community consultation. The aim of the LDS is to inform the public and interested parties in advance of when public consultation is likely to take place for individual documents.
- 1.4.2 Details of how the community and interested parties will be involved in Local Plan preparation is set out in a separate document that has been produced by the Council entitled 'Statement of Community Involvement' (SCI). The current SCI was adopted in November 2018 and subject to a temporary update suspending some elements in response to Covid 19 restrictions and changes to national regulations.
- 1.4.3 In addition to the LDS the Council issues regular editions of 'PLAN IT' an e newspaper which provides updates on progress on key DPDs and other related work in support of the Local Plan and provides updates/notifications through the Stay Connected systems for those who wish to be notified of key consultations.

## 2.0 Current Development Plan

## 2.1 **Current Policy Coverage**

2.1.1 The adopted Core Strategy sets out a comprehensive set of policies which in the main replace those of the Replacement Unitary Development Plan (RUDP) adopted in October 2005 (as saved by the Secretary of State in 2008). However, some of the RUDP policies are saved linked to allocations and policy designations shown on the Policies Map, until the comprehensive allocations refresh these. The Council published a schedule setting out the status of the saved RUDP Policies following adoption of the Core Strategy which is available on the Council's web site. The exception is in the two adopted Area Action Plan Areas where these now provide comprehensive up to date allocations and designations as well as local policies. The detailed policies in relation to waste are in the adopted Waste Management DPD which also includes site allocations. The latest schedule of saved and deleted RUDP Policies following the adoption of the Core Strategy DPD, Area Action Plans and Waste Management DPD is available on the Council's website.<sup>3</sup>

Box 1: Adopted Development Plan

Core Strategy (Adopted 2017)

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<sup>&</sup>lt;sup>3</sup> https://www.bradford.gov.uk/Documents/UnitaryDevelopmentPlan/2.%20RUDP%20%20-%20Archive%20History/7%20RUDP%20Saved%20Policies%20October%202008//RUDP%20Saved%20Policies%20Stateme nt%20Update%20June%202020.pdf

- Sets out the broad aims and objectives for sustainable development within the Bradford District for the next 15 to 20 years until 2030.
- Includes key diagram.
- Sets out broad policies for guiding where new development should be located and where development should be restricted.
- Sets out the broad locations for new housing, employment and infrastructure investment.
- Does not allocate specific sites for new housing and employment development.

## City Centre Area Action plan (adopted 2017)

Spatial vision for locality and plan objectives. Comprehensive allocations and designations as well as detailed policies including locally specific development management policies.

## Shipley and canal Road Corridor Area Action plan (adopted 2017)

Spatial vision for locality and plan objectives. Comprehensive allocations and designations as well as detailed policies including locally specific development management policies.

## Waste Management Development Plan Document (adopted 2017)

Detailed policies for the management of waste and allocation of sites to meet needs to 2030.

# Replacement Unitary Development Plan (adopted 2005) (Update Schedule of Policies – June 2020)

Limited set of policies saved linked to allocations and designations including Green Belt outside of the two Area Action plans.

## **Neighbourhood Development Plans (NDPs):**

These set out local policies to shape the future growth and development of a number of the District's communities. These policies cover a range of subjects including local designations to protect or enhance existing community facilities, protecting Local Green Spaces, guidance on the design of new development, or addressing local infrastructure needs. None of the following "made" (adopted NDPs) include site allocations for housing or employment:

- Addingham Neighbourhood Development Plan (Made January 2020):
- Burley in Wharfedale Neighbourhood Development Plan (Made May 2018)
- Harden Neighbourhood Development Plan (Made September 2023)
- Haworth, Cross Roads & Stanbury Neighbourhood Development Plan (Made June 2021).
- Ilkley Neighbourhood Development Plan (Made June 2022)

- Oxenhope Neighbourhood Development Plan (Made June 2022)
- Steeton with Eastburn & Silsden Neighbourhood Development Plan (Made June 2021).
- 2.1.2 The status of the adopted policies in the Local Plan will continue to be monitored against compliance with NPPF.
- 2.1.3 In terms of the housing allocations in the RUDP the Council received legal advice in November 2011 to the effect that with the lapsing of RUDP Policies H1 and H2 any unimplemented housing site is no longer allocated as part of the saved statutory development plan. This was never the intention of the approach to saving policies, as approved by the Council or that of the Secretary of State in their Direction. To this end Executive on 21 November 2011 resolved to clarify the status of these sites, in particular the need to give significant weight to any such unimplemented sites based upon the work undertaken in their original allocation as part of the RUDP. This situation is presently resolved for the two AAP areas following their adoption. The move to a single integrated Local Plan will resolve for the wider District the housing allocations as well as update allocations within the current Area Action Plan areas. In the meantime, the weight which can be given to former RUDP sites will be more limited given changes in circumstances since the original decision, with limited weight where those sites remain sustainable and appropriate locations for such development.

## 2.2 Community Infrastructure Levy (CIL)

- 2.2.1 The Bradford District Community Infrastructure Levy Charging Schedule was formally approved by Full Council on 21 March 2017 and took effect from 1 July 2017.
- 2.2.2 The Infrastructure Funding Statement sets out the contributions received and where it has been spent. This is published annually. The Council reports to Executive annual at its meeting in July the amount of CIL collected in the preceding year and proposed allocation.

#### 3.0 Where Are We now

## 3.1 Progress Against the Revised LDS 2021

- 3.1.1 The regulations require the LDS to be reviewed on a regular basis to take account of progress and slippage on any documents and new policy issues. The review should be linked to the production of the Authority Monitoring Report (AMR) which considers progress on meeting the programme set out in the LDS. The AMR sets out the progress in developing the Bradford Local Plan against the timetable in the 2021 LDS.
- 3.1.2 While significant progress has been made to put in place the local plan, there has been slippage on the LDS milestones. There are several reasons for this;

- further significant national planning reforms emerging;
- ensuring a robust and up to date evidence base;
- reducing local government resources;
- changing local circumstances and opportunities;
- impact of Covid and
- additional work pressures (Neighbourhood Plans, Brownfield Register etc).
- 3.1.3 These issues have informed a review of both the approach and timetable.
- 3.1.4 Figure 1 below provides an overview of the plan-making approach together with wider context.

**New Plan Structure** Portfolio Plan One Plan Format Core Strategy (under review) Frameworks Area Action Plans (City Centre / Canal Road) Policy Masterplans Waste DPD **SPDs** Allocations DPD Planning changes - NPR and other major infrastructure projects City Masterplanning **Town Plans** Linking jobs and housing growth COVID-19 implications Challenges and Directions Major heath infrastructure Data and intelligence Better design and place-making Climate change and air quality

Figure 1: Moving from Portfolio to Single Plan

## 3.2 Progress on Development Plan Documents

#### **Draft Bradford District Local Plan**

3.2.1 As outlined above the Council has reviewed the approach and has moved from the Portfolio approach to a single comprehensive local plan. This was based on a range of work undertaken as part of the development of the different DPDs and took account of earlier consultations as well as more recent circumstances and national policy.

- 3.2.2 This culminated in the Draft Bradford District Local Plan Regulation 18 (2020-2038) published between 8<sup>th</sup> February 2021 and 24<sup>th</sup> March 2021 for comments. The Draft Local Plan set out an updated vision and strategic development strategy as well as detailed strategic and thematic policies together with area-based proposals and designations including sites for housing and economic development.
- 3.2.3 The consultation sought views on the preferred approach as well as the alternative options considered including sites at this stage discounted. A range of evidence and draft assessments were published alongside the draft local plan for comment. A further call for sites was also issued.
- 3.2.4 The representations have been recorded and summaries published online. The call for sites information has also been published for information. The main issues raised have been reviewed and considered as the work progresses forward to the next version of the Local plan.
- 3.2.5 A significant number of technical work has progressed and will inform the next version of the Local plan. The main technical work is summarised below:

## 1. Strategic evidence

**Strategic Housing Market Assessment** (SHMA) - Arc4 have been commissioned to provide an update to the SHMA to inform the housing policies.

**Employment Land Assessment** – the Council are in the process of completing an update to the employment evidence which will inform the policies as well as the scale and choice of new sites to meet growth ambitions.

**Strategic Flood Risk Assessment (SFRA)**– the Council have completed a Level 1 Flood risk produce by JBA in consultation with the EA.

**Green Belt** – review /update of green belt assessment and consideration of representations on the Draft local plan.

**Update of Landscape Character Assessment** 

**Viability assessment** – Specialist consultants were commissioned to produce a study of the whole plan requirement on site viability.

**Strategic Transport Model** – ongoing work to model the impact of the site options and mitigations.

## 2. Sites

**Housing supply information** – updated to a 2023 base date to ensure full information on potential sites and commitments.

**Site Assessment methodology** – updated approach in light of technical evidence and representations. Re assessment of site options using updated approach including new sites put forward since draft plan.

Landscape sensitivity assessment

Heritage impact assessments

**Flood risk assessment –** Currently undertaking level 2 assessments of sites flagged on the back of the Level 1 SFRA.

3.2.6 Alongside the above the infrastructure plan is being updated. Work has also progressed on the range of supporting assessments including Health, Sustainability and Equality which will continue to be updated as the local plan is progressed to its next version.

## 3.3 Progress on Supplementary Planning Documents

- 3.3.1 The 2021 LDS set out four Supplementary Planning Documents which were to be progressed. These were:
  - Review Landscape Character SPD
  - Review Planning Obligations SPD / Developers Contributions
  - Highways Design Guide
  - South Pennine Moors SPA/SAC Planning Framework SPD
- 3.3.2 The review of the Landscape Character SPD has now been completed and involved the preparation of a new Landscape Character Assessment in line with the latest guidance. The work also included a landscape sensitivity assessment of sites which may potentially be allocated in the Local Plan. The new Landscape Character work has yet to be formally taken through the SPD process due to government changes to the status of SPDs.
- 3.3.3 The South Pennine Moors SPA/SAC Planning Framework SPD was developed alongside the emerging Local Plan and issued for consultation alongside it between 8<sup>th</sup> February 2021 and 24<sup>th</sup> March 2021. There were approximately 179 representations submitted, which have been considered and minor amendments proposed. The SPD was approved at Executive on 4<sup>th</sup> January 2022, and has been in force since 1<sup>st</sup> April 2022 for decision making purposes.
- 3.3.4 The Highways Design Guide SPD was linked to the Housing Design Guide but to date has not progressed due to other commitments.
- 3.3.5 The Planning Obligations SPD has also not been progressed as the Council awaited confirmation of the national planning reforms on development contributions which were progressing through the Levelling up & Regeneration Act.

## 3.4 Progress on Neighborhood Development Plans

- 3.4.1 Several of communities are using the provisions set out in the Localism Act 2011 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended) to prepare neighbourhood development plans (NDPs)\_ to help shape future growth and development of their communities in the coming years. Once formally made (adopted) these form part of the statutory development plan for the District and will be used to make decisions on planning applications in the areas they cover, where appropriate.
- 3.4.2 Since the introduction of neighbourhood planning The Council has approved 13 applications for Neighbourhood Area designation submitted by qualifying bodies. All have been from Town or Parish Councils (see below):

- Addingham Parish Council (June 2015)
- Baildon Town Council (June 2015)
- Bingley Town Council (June 2015)
- Burley In Wharfedale Parish Council (November 2013)
- Cullingworth Village Council (January 2015)
- Harden Village Council (August 2017)
- Haworth, Cross Roads, and Stanbury Parish Council<sup>4</sup> (December 2014)
- Ilkley Town Council (November 2013)
- Keighley Town Council (December 2022)
- Menston Parish Council (December 2014)
- Oxenhope Village Council (November 2012)
- Steeton-with-Eastburn Parish Council and Silsden Town Council (December 2014)
- Wilsden Parish Council (December 2014)
- 3.4.3 Seven Neighbourhood Development plans have been through examination and have been legally 'made' following successful local referendum. These are:
  - Addingham (January 2020)
  - Burley in Wharfedale (May 2018)
  - Harden (September 2023)
  - Haworth, Cross Roads & Stanbury (June 2021)
  - Ilkley (June 2022)
  - Oxenhope (June 2022)
  - Steeton with Eastburn & Silsden (June 2021)
- 3.4.4 Several other plans (Baildon, Bingley, Keighley and Wilsden) are at varying stages of progression, with some being more advanced than others. It is anticipated that these will progress during the next two years. To date, there have been no proposals put forward to review any of the "made" neighbourhood development plans.
- 3.4.5 The Local Plan team will continue to support communities in bringing forward their plans over the coming years. Progress will be reported in the Authority Monitoring Report (AMR), whilst the Neighbourhood Plans section of the website will be kept up to date.
- 3.4.6 Work on Neighbourhood Development Plan for Cullingworth has formally stopped.

#### 4.0 SCHEDULE OF PROPOSED LOCAL DEVELOPMENT DOCUMENTS

## 4.1 Proposed Development Plan Documents

4.1.1 It is intended that the DPDs listed below are to be produced by Bradford Council in the next three years:

It should be noted that as of May 2023, the parish council has been split into two separate parishes – one covering Cross Roads and the other covering Haworth and Stanbury.

- Bradford District Local Plan (DPD)
- Policies Map (DPD)
- 4.1.2 Details for each of the DPDs is set out in the Table 1. They provide a brief description of the content of each document, and the key milestones for document preparation from early public consultation through to adoption.
- 4.1.3 The council is not proposing to produce any SPDs given the changes in the local plan system and with focus of resources being on progressing the new Local Plan.

## TABLE 1 PROFILES OF DEVELOPMENT PLAN DOCUMENTS

| Development Plan Document    | Description, Geographical Area and Conformity  | Current Stage and timetable  |
|------------------------------|--|--|
| Bradford District Local Plan | Description:   |  |
|                              | A) Review of district wide policies including:   | Publication Draft –August 2024   |
|                              | <ul> <li>Plan Period and Strategic Core Policies, covering</li> <li>Overall development strategy centred around presumption in favour of sustainable development (SP1), spatial priorities for the District (SP2), Hierarchy of Settlements (SP3) and location of development (SP4).</li> <li>Green Belt (SP5) – identification of exceptional circumstances for release of land for housing and employment together with compensatory improvements.</li> <li>Key growth and investment anchor strategic policies</li> </ul> | Submission –December 2024 Examination –January 2025- April 2026 Adoption –July 2026. |
|                              | covering economic growth and land requirements (SP6), housing growth – requirement, supply, distribution and priorities (SP8) and planning for sustainable transport (SP7) with transport infrastructure / scheme designations.  |  |

| Development Plan<br>Document | Description, Geographical Area and Conformity   | Current Stage and timetable |
|------------------------------|---|-----------------------------|
|                              | <ul> <li>Climate Change, Environmental Sustainability and<br/>Resource Use (SP9) – net zero carbon emissions<br/>by 2038.</li> </ul>  |                             |
|                              | <ul> <li>Green Infrastructure (SP10) – identified<br/>infrastructure network and role in relation to<br/>development proposals.</li> </ul>  |                             |
|                              | <ul> <li>Protecting the South Pennine Moor SPA / SAC and<br/>their Zone of Influence (SP11) – zonal designations<br/>and approach to managing development.</li> </ul>   |                             |
|                              | <ul> <li>Strategic Policies relating to Planning for Minerals<br/>(SP12) and Waste Management Infrastructure<br/>(SP13).</li> </ul>   |                             |
|                              | <ul> <li>Strategic policies in relation to place design (SP14)<br/>and creating healthy places (SP15), together with<br/>working collaboratively with key stakeholders and<br/>communities (SP16).</li> </ul> |                             |
|                              | A wide range of thematic policies focused upon:   |                             |
|                              | Employment land and site strategy, employment zones, local skills / training and retail and leisure.  |                             |
|                              | Transport planning, including key delivery projects,<br>the relationship between transport and the  |                             |

| Development Plan<br>Document | Description, Geographical Area and Conformity   | Current Stage and timetable |
|------------------------------|---|-----------------------------|
|                              | environment, development and tourism together with policies on parking, freight and aircraft safety.  |                             |
|                              | <ul> <li>Housing delivery, density, standards and types as<br/>well as affordable housing.</li> </ul>   |                             |
|                              | <ul> <li>Environment policies covering a wide range of<br/>topics, including green infrastructure, biodiversity /<br/>geodiversity and trees, historic environment,<br/>landscape, countryside, flood risk, air quality,<br/>environmental protection, energy, minerals and<br/>waste.</li> </ul> |                             |
|                              | <ul> <li>Community policies concerned with open space,<br/>sport and recreation, local facilities and managing<br/>the impact of development on the health of<br/>communities.</li> </ul>   |                             |
|                              | <ul> <li>Design and practical policies to achieve better<br/>design, working with landscape and urban character<br/>and quality design in relation to streets, movement<br/>and safe and inclusive places.</li> </ul>   |                             |
|                              | B) Area Strategies and Site Allocations   |                             |
|                              | <ul> <li>Retention of the four Core Strategy sub areas of<br/>the Regional City of Bradford (including Shipley<br/>and Lower Baildon), Airedale, Wharfedale and</li> </ul>  |                             |

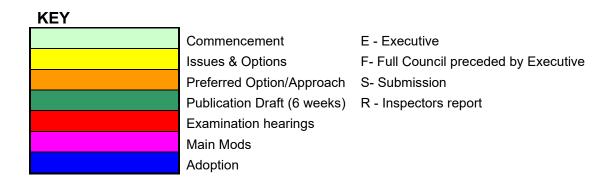
| Development Plan<br>Document | Description, Geographical Area and Conformity  | Current Stage and timetable |
|------------------------------|--|-----------------------------|
| Document                     | the Pennine Towns and Villages and includes a range of more detailed area profiles together with local area strategies providing wider context to site allocations and clear place-based approach to planning.  Site allocations with supporting material for housing and employment uses. |                             |
|                              | <ul> <li>Environmental and other designations.</li> <li>Policies in relation to implementation, delivery and monitoring.</li> </ul>  |                             |
|                              | C) Policies Map DPD  |                             |
|                              | <ul> <li>Development of new policies map and inset plans as required.</li> </ul>   |                             |
|                              | Geographical Area: District Wide   |                             |
|                              | Conformity: NPPF   |                             |

#### 5.0 PROGRAMME OF PROPOSED LOCAL DEVELOPMENT DOCUMENTS

5.1 The timetable for the production of Local Plan Documents is highlighted in the Gantt Chart (table 2) below. Table 2 illustrates the key stages for producing Development Plan Documents.

TABLE 2: PROGRAMME OF DEVELOPMENT PLAN DOCUMENTS

|                       |   |   |   |   |   | 202 | 24 |   |   |   |   |   |   |   |   |   |   | 202 | 25 |   |   |   |   |   |   |   |   |   |   | 202 | 26 |   |   |   |   |   |
|-----------------------|---|---|---|---|---|-----|----|---|---|---|---|---|---|---|---|---|---|-----|----|---|---|---|---|---|---|---|---|---|---|-----|----|---|---|---|---|---|
| Document Title        | J | F | М | Α | М | J   | J  | Α | s | 0 | N | D | J | F | М | Α | М | J   | J  | Α | s | 0 | N | D | J | F | М | Α | М | J   | J  | Α | s | 0 | N | D |
| Local Plan timeline 1 |   |   |   |   |   |     | F  |   |   |   |   | s |   |   |   |   |   |     |    |   |   |   |   |   |   |   |   | R |   | F   |    |   |   |   |   |   |



#### 6.0 MONITORING AND REVIEW

- 6.1.1 A key aspect of the planning system is the process for monitoring and review of the progress of preparing Local Plans, and the effectiveness of implementing policies and proposals contained within it. It is a requirement of the 2004 Act that the Council produces an Authority Monitoring Report (AMR). The AMR will cover the period 1st April 31st March. The AMR assesses:
  - How the Council is performing in meeting key milestones and targets for Local Plan preparation as set out in the Local Development Scheme.
  - The extent to which policies in the Local Plan are being achieved, and where they are not, the reasons why.
  - The impact Local Plan policies are having on local policy targets, and any other targets identified.
  - Whether policies in the Local Plan need to be replaced/adjusted because they are not working as intended.
- 6.1.2 The AMR will therefore highlight any changes that need to be made to Local Plan, such changes, where necessary, will then be reflected in subsequent reviews of the LDS rolling work programme.

## 7.0 SUPPORTING STATEMENT

7.1 Explanation and Justification of the Approach Set Out in the LDS

## **Development Plan Documents**

- 7.1.1 With the adoption of the Core Strategy, the Council put in place the high-level strategic development Strategy including scale and distribution of development and a range of thematic policies. This adopted DPD will be used for development management purposes in determining planning applications and also informing investment decisions, until it is superseded through the adoption of the new integrated single plan. The Core Strategy also sets out clear policies to inform Neighbourhood Plans.
- 7.1.2 Progress in putting in place detailed site allocations has been made with the adoption of the two Area Action Plans and the Waste Management DPD. However, until recently, wider allocations have taken longer to establish, and new opportunities have arisen within the District in particular Bradford City Centre which need to be considered as well as new challenges and priorities.
- 7.1.3 The National Planning Policy Framework sets out the policies and practice guidance relating to key aspects of strategic policy as well as the approach to local plans. The need for up-to-date Local Plans is imperative and this has been restated in recent ministerial statements and the Levelling-Up & Regeneration

Act 2023 together with the recently published updated NPPF. In light of this it is important that the District puts in place an up to date comprehensive local plan to set clear priorities and provide certainty to both investors/partners and communities.

- 7.1.4 There are a number of local and national drivers supporting the move to a new 'single plan':
  - Clearer simplified plan-making with policy and site considerations worked up in parallel and in one place.
  - Potential major infrastructure investment providing the catalyst to revisit city masterplanning and the delivery of the City Centre Area Action Plan. The vision for Bradford City is about ensuring a more liveable and healthier urban environment which appeals to everyone – residents, workers and tourists alike, both young and old and across all our communities.
  - Rethinking the role of the city in light of new investment opportunities but also a post-pandemic landscape which has amplified major structural change in retailing.
  - Reconsidering the extent and opportunities for greater residential development of different types within Bradford City, Keighley and other urban areas.
  - Embedding site allocations within an increasing complex range of policy considerations and moving forward with a more area-based approach overall.
  - Setting the foundations for a single plan to move forward within a revised national planning context focused more explicitly on area-based planning.
  - Underpinning growth ambitions with masterplanning and clear spatial directions – integrating key policy themes.
- 7.1.5 The integrated local plan remains committed to supporting the transformation and economic, physical and social regeneration of the wider Regional City of Bradford and its diverse neighbourhoods. The local plan will retain a focus upon the different quadrants within the wider regional city but the analysis and strategy for change is far more about local areas and neighbourhoods.
- 7.1.6 Within the Airedale corridor, Keighley continues to be identified as a key regeneration area. Again, the single plan structure helps connect spatial priorities with policy directions and there are further opportunities to be explored for growth and investment in relation to the town centre and surrounds.
- 7.1.7 Holme Wood remains an important regeneration priority within Bradford South East there is a need to integrate new investment in housing to support, retain and improve local services and facilities. It also needs to be better connected to improved public and green spaces and green infrastructure corridors. This work is to be supported through a more spatial approach focusing upon high quality masterplanning as a key concept.

- 7.1.8 The plan direction is also linked to ambitions for a green economic recovery and balanced approach to growth with heightened environmental priorities. Key considerations include:
  - Protecting our environmental resources and requiring new development to leave biodiversity in a measurably better state than beforehand, contribute towards mitigating impacts in some of our most valuable landscape and habitat areas and minimise impact on heritage assets.
  - A strongly committed approach to tackling climate change, improving air quality and creating healthier communities – supporting significant improvements in environmental build standards, energy use and tackling air pollution combined with a further focus upon health impacts, active travel, enhancing public transport uses and developing green infrastructure networks. Repositioning to achieve a net zero carbon district by 2038.
  - Prioritising the allocation of brownfield and non-Green Belt sites first and then taking a measured and sensitive approach to Green Belt release where further growth cannot be accommodated within current settlement boundaries.
  - Ensuring sufficient quantity and quality of employment land to support and sustain economic recovery and growth and ensuring that opportunities for diversification into the green economy are not lost and local people benefit from growth through jobs, skills and training.
  - Balancing growth across sustainable settlements by ensuring that local services and facilities continue to thrive and affordable and other types of housing support local needs. Growth is underpinned by sufficient infrastructure – open spaces, community and health facilities and digital networks.
- 7.1.9 In the light of national legislative reforms and policy as well as local circumstances the Council moved to a single comprehensive local plan, allows for a clearer and refreshed definition of spatial priorities and linked policy directions.

## **Supplementary Development Plans**

7.1.10 Given the current focus on getting in place an up to date Local Plan and also guidance in NPPF and changes to the planning system with the move to supplementary plans no SPDs are proposed to be prepared.

## **Linkages to Key Strategies**

#### **District Plan**

7.1.11 The Bradford District Plan (2021 -2025) produced with the Wellbeing Board (the lead Partnership for the District) sets out the key priorities and the framework for

wide partners' action. Together our partnerships represent a wide range of public, private, community and faith organisations from across the District. The key outcomes of the District Plan are:

- Children have the best start in life;
- Residents achieve good health and wellbeing;
- Sustainable economic growth and decent work for all;
- Safe, sustainable and inclusive communities; and
- Action at all levels to address climate and environmental change.
- 7.1.12 These priorities have informed the spatial vision and objectives of the Local Plan.

#### Council Plan

- 7.1.13 The Bradford Council Plan (2021 to 2025) is the authority's working document for what it wants to achieve to create as good a quality of life as possible for the people and communities of Bradford District. The current plan builds on some of the same priorities as the 2016 2020 plan but also looks to address some new major challenges the district will face in the coming years. Thes include the ongoing recovery from the COVID-19 pandemic and meeting the challenges of the cost-of-living crisis, as well as taking the steps we need to deal with the climate emergency and to continue to build on sustainable delivery.
- 7.1.14 The Local Plan, and its policies will have an important role in contributing towards the achievement of number of the Council Plan priorities and outcomes, in particular:
  - Great Start, Good School
  - Creating a Sustainable District;
  - Better Skills, More Good Jobs and a Growing Economy;
  - Decent Homes:
  - Better Health, Better Lives; and
  - Safe, Strong and Active Communities
- 7.1.15 The Local Plan will provide the spatial strategy for the implementation and delivery of aspects of the District Plan that relate to the use and development of land.

#### **Housing Strategy**

7.1.16 The Bradford Housing Strategy 2020 to 2030 "A Place to Call Home, A Place to Thrive" sets out the vision, priorities and approach to meeting the housing needs of the residents of Bradford District in ways that can contribute to a more productive and inclusive economy, address health and social inequalities, tackle the challenge of climate change and help build stronger communities. Its objectives are:

More Homes - We want to increase the supply of homes of the right type and quality and in the right locations to meet the needs and aspirations of our diverse and growing population.

Quality Homes and Neighbourhoods - Our homes and neighbourhoods should be sensitive to future environmental, demographic and technological change. We want high-quality homes in neighbourhoods where people want to live and thrive. We want new developments of the highest quality standards and existing homes retrofitted to create homes that are energy efficient and adaptable.

Homes for All - We want to ensure that everyone has a place to call home and that vulnerable residents in our communities are supported to live independently.

7.1.17 The Local Plan is central to delivering these objectives and puts in place a statutory policy framework to do so.

#### **Communities and Health**

- 7.1.18 Recent work by the Town Fund partnerships for Keighley and Shipley has been considered in developing the Local Plan and key priorities.
- 7.1.19 The Local Plan includes a focus upon regeneration, jobs and skills development together with helping create healthy safe places.
- 7.1.20 Bradford's economic strategy which is currently being updated will inform the local plan as it progresses to the next stage.
- 7.1.21 The Bradford District Children and Young People's Strategy 2023-2025 'sets out a vision and priorities for children, young people and families, how the plan will achieve these. There are specific local plan connections through health orientated policies to the strategy in relation to reducing health and social inequalities, including tackling child poverty and reducing obesity. The Local Plan includes a significant focus upon creating healthy places including a major strategic policy focus.

## **Air Quality and Transport**

- 7.1.22 Air quality is a key issue for the District and is subject to Ministerial Direction to achieve compliance with legal limits for nitrogen dioxide (NO2) in the shortest possible timeframe. The Bradford Clean Air Zone (CAZ) was introduced on the 26th September 2022, requiring non-compliant buses, HGV, LGV and taxis/private hire to pay a daily charge to enter the CAZ unless they are subject to an exemption. The CAZ will remain in place until the Government is satisfied that compliance with legal limits for air quality can be maintained.
- 7.1.23 The Council is currently in the process of preparing a Bradford Transport Strategy 2040. This will sit alongside the West Yorkshire Transport Strategy 2040 and set out a vision for the future of transport within the District.

## **Sustainable Development**

- 7.1.24 The Council's Sustainable Development Action Plan (2020 to 2021) was approved in March 2020. The plan sets out a package of measures to help tackle climate change while building a sustainable and prosperous economy that works in the interests of everyone and minimises waste and the use of finite natural resources. The proposed measures are in line with the UN's Sustainable Development Goals and will cut carbon and costs, help to reduce household bills through better energy efficiency, improve health and wellbeing and generate new jobs and sustainable economic growth through investment in a green economy.
- 7.1.25 The Sustainable Development Action Plan is currently being updated.
- 7.1.26 The Council declared a Climate Emergency in 2019 and, as a West Yorkshire Authority, is committed to Net Zero by 2038, with significant progress required by 2030. The Council is currently preparing the Climate Action / Net Zero Plan (2024-2038)
- 7.1.27 Local Plans are an essential part of the system and are required by law to achievement of sustainable development and its policies will set out a positive framework for doing so.

#### **Culture and Heritage**

- 7.1.28 The District has a rich and diverse culture and rich heritage, which are recognised in the Local plan. These are central to sensitive planning for change and also support communities going forward. Key documents include:
  - Culture is Our Plan 2021 2031
  - The Heritage Action Plan For Bradford District 2022 2031

## City Region, Duty to Cooperate and Partnerships

- 7.1.29 In preparing the Local Plan, it is essential to take account of the wider context of the Leeds City Region. The Council is a member of the Leeds City Region Local Enterprise Partnership (LEP) and the West Yorkshire Combined Authority (WYCA). The LEP is responsible for preparing the Leeds City Region Strategic Economic Plan (SEP) that provides the economic policy framework for the area, with a focus upon a number of key subjects including Skills and Employment, Digital, Transport, Green Infrastructure, Trade and Investment, and Housing, Regeneration and Infrastructure. WYCA is responsible for the preparation of West Yorkshire Transport Strategy and helping to deliver the SEP.
- 7.1.30 There is also a mayoral devolution deal for West Yorkshire. This provides an elected mayor and mayoral combined authority control over annual £38 million investment fund as well as new powers over transport, education and housing.

- 7.1.31 The Duty to Cooperate requires the Council to work closely with neighbouring local authorities such as Leeds City Council or Kirklees Council as well as a number of key public sectors bodies including the Environment Agency or Natural England. This means engaging with one another in an active, constructive and ongoing basis to address cross-boundary, strategic planning issues as part of preparing the Local Plan. This takes a variety of forms including holding regular meetings, collaborating on producing evidence to support the Plan or participating in various regional or subregional working groups.
- 7.1.32 The Council is required to produce a Statement of Common Ground with key partners. It is a written record of the progress made by council and partner bodies to address cross boundary, strategic planning matters, and documents where effective co-operation is taking place during the plan-making process. It is also a way of demonstrating at examination that Local Plans are deliverable over their lifetime, as well as being based on effective joint working across local authority boundaries.
- 7.1.33 There is a significant history of collaboration within the Yorkshire and Humber region on strategic planning issues. This has continued through the Leeds City Region and between individual local planning authorities. The Council is a signatory to the Leeds City Region Statement of Common Ground. This sets outs the approach to joint working across the city region on planning matters.
- 7.1.34 In addition to the working across the city region, it is also essential to work with bodies that have that sub-national or national remits. The Council is working closely with Transport for the North (TfN) to bring Northern Powerhouse Rail (NPR) to the Bradford.

# Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

- 7.1.35 The Council, as the local planning authority (LPA), is legally required by Section 19 of the Planning and Compulsory Purchase Act 2004 to carry out a Sustainability Appraisal (SA) of their Plans. The Town and Country Planning (Local Planning) (England) Regulations 2012 dictate that after adopting a plan the LPA must make the SA Report available. The SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development, by applying a holistic assessment of the likely effects of the plan on social, economic and environmental objectives.
- 7.1.36 The SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). SEA is a systematic process designed to provide for a:
  - High level of environmental protection
  - Integration of environment into preparation and adoption of plans/programmes
     City of Bradford Metropolitan District Council
     Revised Local Development Scheme March 2024

• Promoting sustainable development

The SA of the Local Plan integrates the requirements of SEA.

- 7.1.37 The emphasis of the process set out in the regulations are on:
  - Collecting and presenting baseline environmental information.
  - Predicting the significant environmental effects of the plan and addressing them during its preparation.
  - Identifying strategic alternatives and their effects.
  - Consulting the public and 'authorities' with environmental responsibilities as part of the assessment process.
  - Monitoring the actual effects of the plan during implementation.
- 7.1.38 The regulations relate to a range of plans and programmes. The main plans caught under the requirements will be those linked to spatial planning such as the Local Plan and the Local Transport Plan. However, a large number of other plans that the Council produces are potentially affected by the Directive e.g. Community Strategy and local regeneration plans/frameworks etc. Therefore, the Council will seek to establish a corporate approach in terms of methodology, baseline information, and involving key stakeholders and the public.
- 7.1.39 The SEA/SA will be fully integrated into the production of all the DPDs from the start, inline with national good practice advice. Each document will be appraised to a level appropriate to the type of DPD and taking account of any previous SA of related documents.

#### **Evidence Base**

- 7.1.40 NPPF states that all Local Plans should be based upon up to date and relevant evidence to formulate the policies in the Plan. A range of evidence has been updated in support of the emerging single local plan. Key elements include:
  - Strategic Housing Market Assessment (SHMA) Update 2021
  - Bradford District Updated Demographic Evidence (2020)
  - Gypsy and Traveller Needs Assessment (GTNA) Update (2021)
  - Future Employment Analysis (ENALR Addendum (2021)
  - Bradford District Open Space Needs and Demand Study (2020)
  - Bradford District Open Space Assessment (2020)
  - Bradford District Selective Green Belt Review (2020/21)
  - Bradford District Sites Assessment Methodology and Report (2021)
  - Bradford District Strategic Land Assessment (SLA) (2020)
  - Bradford District Local Infrastructure Plan (LIP) Update (2021)
- 7.1.41 For more details see following link: Bradford District Local Plan | Bradford Council.

7.1.42 This evidence will be updated as the single local plan progresses towards submission to ensure it has an appropriate range of up-to-date evidence to underpin its soundness at examination.

## 7.2 Managing the Process

## 7.2.1 Managing Resources

- 7.2.2 The Planning and Transport Strategy Service will take the lead in producing the Local Plan. There are 2 dedicated teams working on the Local Plan comprised of 12.9 FTE planning professionals. One of the dedicated team also includes additional Transport Strategy and policy resource.
- 7.2.3 Further resources are available within the Planning Service, including the Landscape, Conservation, Highways and Design Group.
- 7.2.4 The Service will work collaboratively and also draw on the resources and expertise within wider Council services for example Development Services, Economic Development, and Housing as well as Public Health. Other Council services will also contribute as appropriate depending on the nature of the content and approach, including for example education services.
- 7.2.5 Where the Council does not have the technical expertise and/or capacity it has employed specialist consultants to provide support. These have normally taken form of self-contained evidence reports. The work on the plan also requires input and effective resourcing from wider stakeholders, utility companies and neighbouring planning authorities on infrastructure planning in particular.
- 7.2.6 Due to the strategic nature of some aspects of the local plan work through to Regulation 19, which includes large-scale masterplanning and cross-over into infrastructure investment priorities, this is likely to require new ways of working and a stronger focus upon project teams and cross-service delivery.
- 7.2.7 The Council has made agreed non-recurring funding available through the annual Budget process on an occasional basis. This provides non staffing funding for the following types of activity in support of the Local Plan:
  - Preparation of technical evidence and appraisals
  - Consultation and engagement
  - Examination and adoption
- 7.2.8 The Local Plan is supported by a financial plan which profiles the anticipated spend required to support the non staffing elements of the Local Plan.
- 7.2.9 The Local Plan has benefited by non-recurring corporate financial support in previous budgets, in order, to progress the work in line with the LDS. Other funding opportunities will be explored which could address the pressures where possible.

However, the programme will require additional funding to be determined as part of future Budget Processes to ensure progress to adoption.

## 7.2.10 Programme Management

- 7.2.11 The Strategic Director (SD) Place has the overall responsibility for preparing the Local Plan. Day to day management will normally be the Planning and Transport Strategy (PTS) Manager, reporting to the Assistant Director (AD) Planning Transportation and Highways.
- 7.2.12 A Local Plan Board chaired by the AD with a core membership of the SD and Portfolio holder and PTS manager provide strategic level oversight to the Local Plan programme management and alignment to and linkage to corporate priorities. Membership is supplemented by others as required including:
  - Planning
  - Transport Planning
  - Economic Development
  - Housing
  - Corporate support
  - Culture, Tourism and Sport
- 7.2.13 A cross party local plan reference group has been established to provide opportunity for wider sounding on emerging content and approach ahead of any formal consideration by Executive and Full Council. The membership of the group includes representatives from the main political parties as well as the Chairs/Deputy Chairs of Planning Committees and the Portfolio Holder.

## 7.2.13 Political Management

- 7.2.14 The process for the approval of the Local Plan will be as follows:
  - Decisions on informal early consultation such as scoping and issues and options work will be approved by the Assistant Director Planning, Transportation and Highways in consultation with Executive Portfolio holder responsible for Planning.
  - Preferred Options documents will be approved by the Assistant Director Planning, Transportation and Highways in consultation with Executive Portfolio holder responsible for Planning.
  - Full Council resolution required for submission stages.
  - Full Council resolution required for adoption stages.
- 7.2.15 For all SPDs the process for their approval will be as follows:
  - Assistant Director PTH in consultation with Executive Portfolio holder responsible for Planning, to approve for consultation draft SPD.

- The Executive to approve for adoption by Regulatory and Appeals Committee
- 7.2.17 There will be reports to the Council's Executive on progress in preparing Local Plan and consideration of programme by the relevant Scrutiny Committee at appropriate stages.

## 7.2.18 Risk Assessment

7.2.19 There are several areas of risk in preparing the Local Plan as set out in the LDS. The key areas of risk are listed in Table 5 below. This identifies the risk factor, the impact of the risk if it occurs, the nature of that impact, the probability of the risk happening and the mitigation or contingency for dealing with the risk.

**Table 3: RISK ASSESSMENT** 

| Risk  | Nature of Impact   | Impact<br>L/M/H | Probability<br>L/M/H | Mitigation /Contingency  |
|---|--|-----------------|----------------------|--|
| Change to national policy and legislative framework.  | Additional work to comply with new policies causing slippage | н               | М                    | Keep up to date with new legislation and guidance as published and anticipate new guidance based on MHCLG forward plan. Respond early to any significant changes. Integrate into LDS review process.   |
| Failure to comply with Duty to<br>Cooperate. Duty requires ongoing<br>positive engagement with key bodies<br>such as adjacent Councils on cross | Slippage<br>Soundness  | М               | М                    | Ongoing work through the Leeds City Region (LCR) officer and member arrangements in line with the LCR Statement of Cooperation and Statement of Common Ground.   |
| boundary issues in the Local Plan.  |  |                 |                      | Early scoping of strategic issues and potential impacts and instigate arrangements for liaison and ongoing work with key bodies and ensure ongoing and positive engagement and collaborative and cooperative working arrangements on key issues. |
| Volume of work greater than anticipated e.g. submitted representations or work arising from sustainability appraisal.                           | Slippage in programme  | М               | М                    | Allow for a challenging but realistic timetable for Local Plan documents with a degree of flexibility built in.  |
| sustamability appraisal.  |  |                 |                      | Develop robust project plans for each stage using the Planning Advisory Service Tool Kit and Self Assessment and emerging good practice and experience.  |
|   |  |                 |                      | Monitor progress against LDS and review if necessary.  |
|   |  |                 |                      | Consider additional resources either from within the Council or bringing in outside resources where appropriate through collaborative working and selective use of consultants on specialist areas.  |

| Risk  | Nature of Impact   | Impact<br>L/M/H | Probability<br>L/M/H | Mitigation /Contingency   |
|---|--|-----------------|----------------------|---|
| Lack of in-house skills for specialised areas of policy work /sustainability appraisal /background studies. | Slows progress in<br>programme<br>Evidence base<br>compromised       | M               | М                    | Undertake a competency audit for key programme areas and identify gaps linked to project plan.  Review other Council resources.  Commission external support for one off projects                       |
| Local Plan Team required to undertake other unforeseen work.  | Programme slippage   | М               | M                    | Ensure Local Plan given corporate recognition and priority for staff time and resources. Manage other priorities through programme management and Local Plan Board.                                     |
| Staff retention and recruitment.  | Slow progress leading<br>to programme slippage<br>and of continuity. | Н               | М                    | Seek to fill vacant positions with appropriately qualified staff quickly.  Adopt flexible working arrangements.  Call on wider corporate resources to fill temporary gaps.  Use of external consultants |
| Local Plan programme too ambitious.   | Key milestones not met   | Н               | M                    | LDS prepared with emerging good practice and knowledge from other LPAs and Planning Advisory Service, which has informed an ambitious but realistic timetable than the first LDS.                       |

| Risk  | Nature of Impact   | Impact<br>L/M/H | Probability<br>L/M/H | Mitigation /Contingency  |
|---|--|-----------------|----------------------|--|
| Change in circumstance which impact on to delivery of strategic sites and potential soundness of the plan | Plan not being found<br>sound at examination<br>due to failure to show<br>deliverable plan | М               | М                    | Ongoing work to support strategic sites through partnership working and master planning and seeking funding opportunities.   |
| Planning Inspectorate unable to meet the timescale for examination and reporting.                         | Examination and/or report delayed.  Key milestones not met                                 | Н               | М                    | The capacity of PINS is not something that the Council can directly influence. On-going liaison with Government and PINS regarding the programme and key milestones.   |
| Local Plan fails soundness test.  | Local Plan not adopted   | Н               | L                    | Ensure robust up to date evidence base, sustainability appraisal appropriate to the Local Plan, public involvement in line with SCI.   |
|   |  |                 |                      | Develop robust project plans for the Local Plan using the Planning Advisory Service Tool Kit and emerging good practice and experience. Use PAS self assessment at key stages to check 'soundness'. Access PAS support and training packages and other critical friend support as appropriate. |
|   |  |                 |                      | Use of pre submission Inspectors visits.   |
| Legal Challenge.  | Adopted Local Plan<br>quashed in whole or in<br>part.                                      | Н               | L                    | Ensure the Local Plan is 'sound', in that they are founded upon a robust evidence base, sustainability appraisal appropriate to the Local plan, public involvement in line with SCI.   |
|   |  |                 |                      | Seek legal advice including from specialist Counsel on major areas of risk both in terms of content and process.   |
| Inability of key stakeholders, agencies and bodies to cope with demand and fail to deliver on time.       | Weaken evidence to<br>underpin Local Plan at<br>key stages.                                | М               | М                    | Close liaison with all key stakeholders involving sending them a copy of the LDS and involve them in planning the key stages at the earliest opportunity so they can   |

| Risk                                       | Nature of Impact                           | Impact<br>L/M/H | Probability<br>L/M/H | Mitigation /Contingency  |
|--|--|-----------------|----------------------|--|
|  | Slippage of programme                      |                 |                      | programme work. On-going communication with key stakeholders.  |
|  |  |                 |                      | Develop robust project plans for the Local Plan using the Planning Advisory Service Tool Kit and emerging good practice and experience.  |
| Political uncertainty.                     | Lack of commitment to                      | М               | M                    | Make planning central to delivery of Corporate objectives.   |
|  | programme Programme slippage               |                 |                      | Briefing all members as to importance of Local Plan and Planning generally.  |
|  |  |                 |                      | Engagement with all members throughout the preparation process as appropriate to the stage to enable members to understand the approach and procedural issues.                 |
|  |  |                 |                      | Local Plan Cross Party Reference Group used to sound out programme and key content and approach.   |
| Inability to recruit external contractors. | Programme slippage<br>Weaken evidence base | Н               | М                    | Plan the programme of key activities involving the need for consultants at the earliest opportunity. Develop draft briefs and test the market in terms of capacity informally. |

#### **APPENDIX ONE**

#### **GLOSSARY OF TERMS**

**Area Action Plan (AAP)** – These are Development Plan Documents that provide a planning framework for an area of the District where significant change or conservation is needed.

**Authority Monitoring Report (AMR)** – This is a Report that the Council is required to prepare as part of the Local Plan. The Report will annually assess the extent to which policies in Local Development Documents are being achieved.

**Core Strategy** – This is a Development Plan Document that provides the strategic planning framework for the District. It sets out the long-term spatial vision and the strategic objectives and policies to deliver that vision. The strategy contains core policies, a monitoring and an implementation framework. All other Development Plan Documents that form the Local Plan must be in conformity with the Core Strategy.

**Development Plan Document (DPD)** – These are Local Development Documents that are part of the Local Plan. They form the statutory development plan for the district and are subject of an independent examination. They include the following: Core Strategy, Site Allocations, Area Action Plans, and a Proposals Map.

**Local Development Document (LDD)** – These are the individual documents that make up the Local Plan. They comprise of Development Plan Documents, Supplementary Planning Documents and the Statement of Community Involvement.

**Local Development Scheme (LDS)** – This is a three-year rolling work programme setting out the Council's timetable for preparing each Local Development Document. The Scheme is revised regularly in light of outcomes from the Authority Monitoring Report.

**Local Plan** – title of statutory development plan which NPPF recommends to be a single document but can where justified comprise of several Development Plan Documents.

**National Planning Policy Framework (NPPF) –** National Planning policy supported by web based National Planning Practice Guidance (NPPG)

**Regional Spatial Strategy (RSS)** – A document that was prepared by the Yorkshire and Humber Regional Assembly and approved by the First Secretary of State. The RSS provided a spatial planning framework for the region that informed the preparation of the LDFs. The RSS was formally revoked in February 2013.

**Replacement Unitary Development Plan (RUDP)** – This is the current development plan for the district, adopted in the October 2005 and saved in 2008 by the Secretary of State. The report of 5 June 2014 Regulatory and Appeals Committee approved an assessment of

the compliance of the saved policies with the more recent national policy contained in NPPF.

**Statement of Community Involvement (SCI)** – This sets out the standards that the Council intends to achieve in involving the community and stakeholders in the preparation, alteration and review of all Local Development Documents and development control decisions. The Statement of Community Involvement is not a Development Plan Document, nor is it the subject of a sustainability appraisal.

Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) – This is a generic term used internationally to describe the assessment of policies, plans and programmes considering their social economic and environmental impacts and informing the most appropriate approach). An integrated approach to SEA and Sustainability Appraisal will be required to avoid duplication in the plan making process.

**Supplementary Planning Document (SPD)** – These are Local Development Documents that are part of the Local Plan. They provide supplementary guidance to policies and proposals contained in Development Plan Documents, however, they do not form part of the statutory plan, nor are they subject to an independent examination.