



City of Bradford Metropolitan District Council

Local Development Scheme (Revised)

For the period 2021 to 2024

6th July 2021

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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 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 2018. It set out the programme for the period 2018 to 2021.
- 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 2021 to 2024.

1.2 The Development Plan System

Local Development Framework

- 1.2.1 The current Development Plan System was established in the Planning and Compulsory Purchase Act 2004. The Act reaffirmed the importance of the development plan.
- 1.2.2 The 2004 Act introduced the 3 elements which when produced would make up the Development Plan for the Bradford District:
 - Planning Policy Statements (PPS) – setting out national planning policy, produced by Government;
 - Regional Spatial Strategy (RSS) for Yorkshire and the Humber – setting out the planning policy for the region, produced by the Regional Assembly for Yorkshire and the Humber (RAYH) and issued by the government, and
 - Local Development Framework (LDF) – this sets out the core strategy, planning proposals and policies for the District, and is produced at a local level by Bradford Council.

- 1.2.3 The Local Development Framework (LDF) for Bradford District was to consist of a portfolio of Local Development Documents (LDDs), which would provide the framework for delivering the spatial planning strategy for the area. There are two main types of Local Development Documents – Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs):

Development Plan Documents

- 1.2.4 These documents form part of the statutory development plan and will be 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.
- 1.2.5 The LDF would progressively replace the current adopted Replacement Unitary Development Plan (October 2005), as saved.

Supplementary Planning Documents (SPDs)

- 1.2.6 These 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

- 1.2.7 Since 2007 there have been significant reforms to the planning system which have implications for the development plan system.
- 1.2.8 The Localism Act 2011 amended the 2004 Act - significant changes that had an implication for what constitutes the overall development plan for the District.

Regional Spatial Strategy

- 1.2.9 The Regional Spatial Strategy (RSS) for Yorkshire and the Humber (May 2008) provided the strategic context for the preparation of LDFs in the region. The Localism Act formally removed the RSS from the development plan system.
- 1.2.10 The Leeds City Region Leaders Board approved an Interim statement on 21st April 2011 which agreed to continue to follow key elements of the RSS in their ongoing developments plans.
- 1.2.11 With the revocation of RSS, under the Localism Act local planning authorities as well as other prescribed bodies have a new 'Duty to Cooperate' on strategic matters which affect more than one local authority. Guidance on this is contained in the NPPF. Leeds City Region Leaders agreed the approach to be adopted to facilitate this at their meeting on 6 December 2012. This was updated in light of more recent changes which introduced the formal requirement of Statement of Common Ground to be prepared. The current Leeds City Region Statement of Common Ground was published in March 2020 and will be updated on a regular basis if circumstances change and as individual Local Plans progress.

Neighbourhood Planning Tools

- 1.2.12 The Localism Act introduced a number of 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 now available for use by local communities should they choose to use them. One of these is the preparation of Neighbourhood Plans.
- 1.2.13 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.
- 1.2.14 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.
- 1.2.15 The process for preparation of a Neighbourhood Plan is set out in regulations². The qualifying body can then prepare a plan in consultation with their communities, businesses and interest groups.
- 1.2.16 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.
- 1.2.17 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 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.
- 1.2.18 The Localism Act also amended the procedure for preparation of the Local Development Scheme and also Annual (Authority) Monitoring Report.

¹ 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.

² [The Neighbourhood Planning \(General\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2617/contents/make)

National Planning Policy Framework

- 1.2.19 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).
- 1.2.20 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.
- 1.2.21 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.

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) 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 and 2018. The LDS provides summary details of the nature and content of each LDD, the geographic area to which each LDD relates, the interrelationship between documents and the timetable for document 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 refreshes 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. An updated 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.³

Box 1: Adopted Development Plan

Core Strategy (Adopted 2017)

- 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

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

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)

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

Burley in Wharfedale Neighbourhood Development Plan (Made May 2018)

Local development management policies and local designations. Does not include site allocations for homes or jobs.

Addingham Neighbourhood Development Plan (Made January 2020)

Local development management policies and local designations. Does not include site allocations for homes or jobs.

Haworth, Cross Roads & Stanbury Neighbourhood Development Plan (Made June 2021). Local development management policies and local designations. Does not include site allocations for homes or jobs.

Steeton with Eastburn & Silsden Neighbourhood Development Plan (Made June 2021). Local development management policies and local designations. Does not include site allocations for homes or jobs.

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)

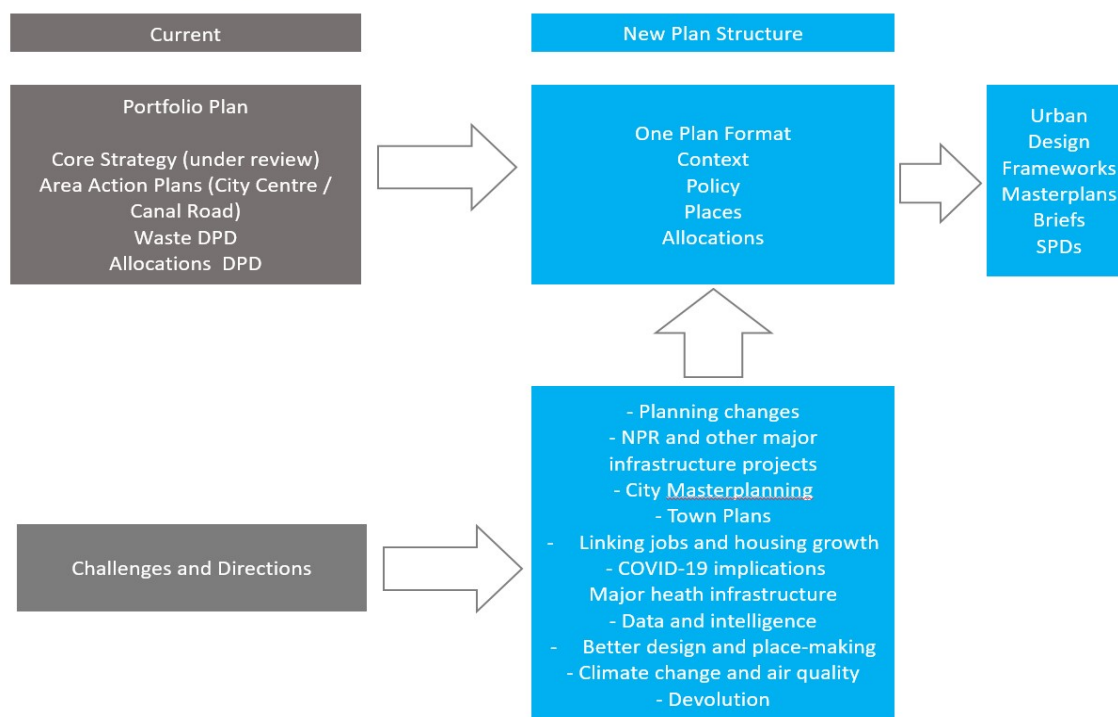
- 2.2.1 The Bradford District Community Infrastructure Levy Charging Schedule was formally approved by Full Council on 21 March 2017 and took effect from 1 July 2017.
- 2.2.2 The Infrastructure Funding Statement (IFS) sets out the contributions received and where it has been spent. This is published annually.

3.0 Where Are We now

3.1 Progress Against the Revised LDS 2018

- 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 2018 LDS.
- 3.1.2 While significant progress has been made to put in place the Local Plan documents, 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. The Council has shifted from the portfolio approach back to a single comprehensive Local Plan. This was undertaken for a number of reasons which are set out further in section 7.
- 3.1.4 Figure 1 below provides an overview of the new plan-making approach together with wider context.

Figure 1: Moving from Portfolio to Single Plan



3.2 Progress on Development Plan Documents

Core Strategy Partial Review

- 3.2.1 Bradford Council started work on the partial review of its adopted Core Strategy in 2018. The initial scoping consultation in January / February 2019 set out the range of key Core Strategy policies which were considered necessary to review in light of changes to national planning policy and local circumstances. These policies mainly relate to housing and employment. Bradford Council consulted on the 'Preferred Options' (Regulation 18) of the Core Strategy Partial Review between 30 July and 24 September 2019.
- 3.2.2 The Council received over 3900 representations, these ranged from local residents, residents outside the District, planning consultants / agents, developers, statutory consultees, interest groups, parish and town councils, internal departments and other parties, councillors and MPs. Detailed feedback on the comments received was published within the Consultation Statement. These have informed more recent work on a comprehensive single Local Plan.

Allocations DPD

- 3.2.3 The progress on the DPD focused on the update and assessment of the land supply options including a range of technical work (Green Belt Assessment. Open Space update and Strategic Flood Risk Assessment).

- 3.2.4 The work undertaken was used to shape the content and approach in the draft single Local Plan (see below).

Draft Bradford District Local Plan

- 3.2.5 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.
- 3.2.6 This culminated in the Draft Bradford District Local Plan Regulation 18 (2020-2038) published between 8th February 2021 and 24th 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.
- 3.2.7 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.

3.3 Progress on Supplementary Planning Documents

- 3.3.1 The 2018 LDS set out three Supplementary Planning Documents which were to be progressed. These were:
- Housing Design Guide
 - Highways Design Guide
 - Management & Mitigation of impacts of development on South Pennine Moors SPA/SAC
- 3.3.2 The preparation of the Housing Design SPD was supported by a Planning Delivery Fund award from Government. The SPD was retitled 'Homes and Neighbourhood: A Guide to Designing in Bradford'.
- 3.3.3 The guide seeks to deliver a step change in the quality of new housing in the District based on a vision for 'green, safe, inclusive and distinctive neighbourhoods that create healthy communities for all'.
- 3.3.4 A number of key local stakeholders were involved in the preparation of the guide including Born in Bradford, an Older and Disabled People Group, Bradford Civic Society, Bradford Property Forum, house builders, and all relevant Council departments. The content of the guide has also been shaped by comments received during the public consultation held between July and September 2019. It was formally adopted on 4 February 2020.

- 3.3.5 The Management & Mitigation of impacts of development on South Pennine Moors SPA/SAC SPD was developed alongside the emerging Local Plan and issued for consultation alongside it between 8 February 2021 and 24th March 2021. There were approximately 179 representations submitted, which have been considered and minor amendments proposed. The revised SPD is due to be considered at the July 2021 Executive.
- 3.3.6 The Highways Design Guide SPD was linked to the Housing Design Guide but to date has not progressed due to other commitments.

3.4 Progress on Neighbourhood Plans

- 3.4.1 The Council has approved 12 applications for Neighbourhood Area designation. These relate to the following Parish/Town Councils:
- Addingham Parish Council
 - Baildon Town Council
 - Bingley Town Council
 - Burley In Wharfedale Parish Council
 - Cullingworth Village Council
 - Harden Village Council
 - Haworth, Cross Roads, and Stanbury Parish Council
 - Ilkley Town Council
 - Menston Parish Council
 - Oxenhope Parish Council
 - Steeton-with-Eastburn Parish Council and Silsden Town Council
 - Wilsden Parish Council
- 3.4.2 Four 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);
 - Haworth, Cross Roads & Stanbury (June 2021), and

- Steeton with Eastburn & Silsden (June 2021).

3.4.3 Several other plans (Bingley, Harden, Ilkley, Oxenhope and Wilsden) are at varying stages of progression. It is anticipated that these will progress during the next two years. 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.

3.4.4 Work on Neighbourhood Development Plans for Baildon and Cullingworth has formally stopped.

4.0 SCHEDULE OF PROPOSED LOCAL DEVELOPMENT DOCUMENTS

4.1 Proposed Development Plan Documents and SPDS

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

- Bradford District Local Plan (DPD), and
- 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. Table 1 also includes reference to a formal review of the CIL.

4.1.3 Table 2 sets out the details of the SPDs to be produced over the next 12 months. The need for further SPDs will be considered as the Local Plan develops and linked to particular complex policy areas. The extent of SPD work will also need to reflect changes to the overall planning system in England. An initial working list under the current planning system of potential longer-term SPD reviews and new material is detailed below. Some of these topics may evolve into combined SPD documents, or are finalised as less formal technical notes.

Environmental

- Bio-diversity net gain;
- Green infrastructure and Standards;
- Buildings and Energy Standards;
- Open Space and Built Recreational Facilities;
- Trees Protection and Woodlands;

- Review - Sustainable Design Guide SPD, and
- Air Quality.

Housing

- Affordable Housing;
- Review - City Centre Affordable Housing SPD;
- Specialist Housing;
- Self-build and Custom Housing;
- Review - Householder SPD, and
- Review - Menston Housing Sites SPD.

Places, Local Communities and Infrastructure

- Review - A Shop Keepers Guide to Securing their Premises SPD;
- Review - Shopfront Design Guide SPD;
- Review - Bradford City Centre Design Guide SPD;
- Review - Hot Food Takeaways SPD / Health Impact Assessments;
- Review - Planning for Crime Prevention SPD, and
- Digital Technology and Infrastructure.

Design

- Design codes, guidance and frameworks relating to the evolving new planning system.

Strategic and Complex Sites

- Site Masterplans and Briefs

TABLE 1: PROFILES OF DEVELOPMENT PLAN DOCUMENTS

Development Plan Document	Description, Geographical Area and Conformity	Current Stage and timetable
Bradford District Local Plan	<p>Description:</p> <p>A) Review of District wide policies including:</p> <ul style="list-style-type: none"> • Plan Period and Strategic Core Policies, covering • 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). • Green Belt (SP5) – identification of exceptional circumstances for release of land for housing and employment together with compensatory improvements. • Key growth and investment anchor strategic policies 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. • Climate Change, Environmental Sustainability and Resource Use (SP9) – net zero carbon emissions by 	<p>Preferred Option – February 2021</p> <p>Publication Draft – July 2022</p> <p>Submission – November 2022 Examination – February / March 2023 Adoption – Late 2023 / Early 2024.</p>

	<p>2038.</p> <ul style="list-style-type: none"> • Green Infrastructure (SP10) – identified infrastructure network and role in relation to development proposals. • Protecting the South Pennine Moor SPA / SAC and their Zone of Influence (SP11) – zonal designations and approach to managing development. • Strategic Policies relating to Planning for Minerals (SP12) and Waste Management Infrastructure (SP13). • Strategic policies in relation to place design (SP14) and creating healthy places (SP15), together with working collaboratively with key stakeholders and communities (SP16). • 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, the relationship between transport and the environment, development and tourism together with policies on parking, freight and aircraft safety. • Housing delivery, density, standards and types as 	
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	<p>well as affordable housing.</p> <ul style="list-style-type: none"> • Environment policies covering a wide range of topics, including green infrastructure, biodiversity / geodiversity and trees, historic environment, landscape, countryside, flood risk, air quality, environmental protection, energy, minerals and waste. • Community policies concerned with open space, sport and recreation, local facilities and managing the impact of development on the health of communities. • Design and practical policies to achieve better design, working with landscape and urban character and quality design in relation to streets, movement and safe and inclusive places. <p>B) Area Strategies and Site Allocations</p> <ul style="list-style-type: none"> • Retention of the four Core Strategy sub areas of the Regional City of Bradford (including Shipley and Lower Baildon), Airedale, Wharfedale and 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. 	
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	<ul style="list-style-type: none"> • Site allocations with supporting material for housing and employment uses. • Environmental and other designations. • Policies in relation to implementation, delivery and monitoring. <p>C) Policies Map DPD</p> <ul style="list-style-type: none"> • Development of new policies map and inset plans as required. <p>Geographical Area: District Wide</p> <p>Conformity: NPPF</p>	
Community Infrastructure Levy	<p>Description: Review of the function and outputs from the current operational CIL with possible revisions to charging schedule.</p>	<p>Technical review: October to December 2021</p> <p>Subject to review:</p> <p>Draft Charging Schedule: January to March 2022</p> <p>Submission: July 2022</p> <p>Examination: November 2022</p>

TABLE 2: PROFILES OF SUPPLEMENTARY PLANNING DOCUMENTS

Supplementary Planning Document	Description, Geographical Area and Conformity	Current Stage and timetable
Review - Landscape Character SPD	<p>Description: Sets out detailed guidance on key character areas and their characteristics together with guidance for managing development and change within them. Review of SPD detail and compliance with any updated professional guidance.</p> <p>Geographical Area: District Wide</p> <p>Conformity: NPPF/Core Strategy</p>	<p>Commencement – October 2021</p> <p>Public consultation – July 2022</p> <p>Adoption – October 2022</p>
Review – Planning Obligations SPD / Developers Contributions	<p>Description: sets out how the Council will seek and deliver infrastructure and community benefits through the use of legal agreements negotiated when a planning application is submitted. Review of SPD detail and update in line with planning regulations.</p> <p>Geographical Area: District Wide</p> <p>Conformity: NPPF/Core Strategy</p>	<p>Commencement – October 2021</p> <p>Public consultation – July 2022</p> <p>Adoption – 2023</p>

Highways Design Guide	<p>Description: Sets out principles and technical guidance to support good design of Highways and transport in support of Core Strategy policy SC9 and related design and Transport/Movement policies. It will complement the Housing Design Guide with the aim of creating excellent new places for people to live and work.</p> <p>Geographical Area: District Wide</p> <p>Conformity: NPPF/Core Strategy</p>	<p>Commencement – October 2021</p> <p>Public consultation – July 2022</p> <p>Adoption – October 2022</p>
Management & Mitigation of impacts of development on South Pennine Moors SPA/SAC	<p>Description: Sets out principles and detailed approach for management and mitigation required to ensure development proposals comply with Core Strategy policy SC8. In particular, it will set out types of mitigation solutions and possible requirements to be made both onsite and off site.</p> <p>Geographical Area: District Wide</p> <p>Conformity: NPPF</p>	<p>Commencement –October 2018</p> <p>Public consultation – February/March 2021</p> <p>Adoption – July 2021</p>

5.0 PROGRAMME OF PROPOSED LOCAL DEVELOPMENT DOCUMENTS

5.1 The timetable for the production of Local Plan Documents is highlighted in two separate Gantt Charts illustrated in tables 3 and 4 below. Table 3 illustrates the key stages for producing Development Plan Documents, Table 4 illustrates the key stages for producing the Supplementary Planning Documents.

TABLE 3: PROGRAMME OF DEVELOPMENT PLAN DOCUMENTS

Document Title	2021J												2022J												2023J												2024J		
		F	M	A	M	J	J	A	S	O	N	D		F	M	A	M	J	J	A	S	O	N	D		F	M	A	M	J	J	A	S	O	N	D		F	M
Local Plan																		F						S												R		F	
Review																																							

KEY

	Commencement
	Issues & Options
	Preferred Option/Approach
	Publication Draft (6 weeks)
	Examination hearings
	main Mods
	Adoption

E - Executive
F- Full Council preceded by Executive
S- Submission
R - Inspectors report

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- 5.2 Subject to the outcome of the technical review of the operation and outputs from the current CIL, the forward programme is broadly tracked to align with the development of the Local Plan.

TABLE 4: PROGRAMME OF SUPPLEMENTARY PLANNING DOCUMENTS

Document Title	2021												2022												2023											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Review - Landscape Character SPD																																				
Review - Planning Obligations SPD																																				
Street Design SPD																																				
Management & Mitigation of impacts of development on South Pennine Moors SPA/SAC																																				

	Commencement of Process - Evidence Gathering and Preparation of Draft SPD
	Public Participation on Draft SPD and Sustainability Appraisal Report for Public Comment
	Consideration of Representations and Finalise SPD
	Adoption

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, and
- 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 with all Councils to have up to date plans by 2023 including the need for District wide allocations to be put in place as

quickly as possible. While the Government is progressing major planning reforms outlined last year in the White paper these will take several years to be enacted with the work commencing this year with the Planning Bill outline in the Queens speech. 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 shaping this move to a new 'single plan' direction:

- 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 healthy 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, and
- 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 including Shipley and Canal Road Corridor, inner city areas of Manningham and Little Horton; North East Bradford – Ravenscliffe and Thorpe Edge; East Bradford – Barkerend, Beech Grove, Bradford Moor, Thornbury, Woodhall and Laisterdyke; South East Bradford – Bierley and Holme Wood; South West Bradford – Buttershaw and Woodside and West Bradford – Allerton. 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 Resetting 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, and
 - 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 policy and local circumstances the Council has moved back to a single comprehensive Local Plan, allowing for a clearer and refreshed definition of spatial priorities and linked policy directions.

Community Infrastructure Levy - Review

- 7.1.10 The Council will also look to see if the Community Infrastructure Levy requires formal review following recent changes to the regulations and following experience of its operation to date. The CIL has been in operation since 2017 and subject to formal reports on the amounts received and spending proposals. Recent changes to the Regulations allow more flexibility around use of section 106 and CIL (particularly with the removal of pooling restrictions). The review will consider whether a revision is required to ensure the District is capturing appropriate level of contributions to support sustainable growth and support critical investment in local infrastructure.

Supplementary Development Plans

- 7.1.11 Given the current focus on getting in place an up to date Local Plan and also guidance in NPPF, only a limited number of SPDs has been identified in this LDS which reflect major priority issues. A review and update to the Landscape Character SPD has been identified while compiling evidence on local area strategies and allocations and as a high level strategic piece of work would usefully link to the current Core Strategy and developing new Local Plan. The second identified SPD relates to a review and update to the Planning Obligations SPD, this will assist will aligning information to inform viability evidence for the new Local Plan but is also connected to the review of CIL also noted within the LDS. The adoption timeline for this SPD is tracked to the progress and adoption of the new Local Plan, which will set out policy on developer contributions and formula but supported by more technical guidance in the form of the SPD. Thirdly, the Highways Design Guide linked to the housing and neighbourhoods design guide and emerging refresh of the transport strategy and wider active travel agenda. A fourth SPD relates to the management and mitigation in support of emerging Core Strategy Policy SC8 which seeks to ensure the protection of the South Pennine Moors Special Protection Area and is due to be adopted.
- 7.1.12 The LDS also sets out a number of potential longer term SPD areas, but these will be further updated or reviewed according to the development of the Local Plan and in consideration of potential wider changes and directions to the planning system in England. A recent consultation on proposed changes to the National Planning Policy Framework has signalled the government's intention for a greater emphasis on design quality, including the use of design codes – simple, illustrated requirements providing specific parameters for the development of a site or area, reflecting local character and preferences

Linkages with the Community Strategy and Other Strategies

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. These include responding to and recovering from the COVID-19 pandemic; and following the Council's declaration of a climate emergency, taking the steps we need to take to deal with that 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:

- Building a Better Future;
- 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, and
- 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 The Bradford District Partnership's (BDP) 'Stronger Communities Together' Strategy (2018-2023) focuses upon a shared vision: 'to make Bradford District a great place for everyone – a place where all our children have a great start in life, where businesses are supported to create good jobs and workers have the skills to succeed, a place where people live longer, and have healthier lives and all our neighbourhoods are good places to live with decent homes for everyone'.
- 7.1.19 Key priorities include equality of opportunity - addressing factors affecting economic participation and poverty.
- 7.1.20 Recent work by the Town Fund partnerships for Keighley and Shipley has been considered in developing the Local Plan and key priorities.
- 7.1.21 The Local Plan includes a focus upon regeneration, jobs and skills development together with helping create healthy safe places.
- 7.1.22 Bradford's new economic strategy – 'Pioneering, Confident and Connected' was one of the original drivers for the partial review of the Core Strategy and is embedded within the employment policies within the Local Plan.
- 7.1.23 The BDP 'Children, Young People and Families Plan 2017-20' sets out a vision and series of priorities for children, young people and families, how the plan will achieve these. There are particular 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. There are also connections to this work to the 'Connecting people and place for better health and wellbeing - A Joint Health and Wellbeing Strategy for Bradford and Airedale, 2018-2023', with its priorities focused upon giving children a great start in life; ensuring people in Bradford have good mental health and people in all parts of the District are living well and ageing well together with supporting the development of the District as a healthy place to live, learn and work. The Local Plan includes a significant focus upon creating healthy places including a major strategic policy focus.

Air Quality and Transport

- 7.1.24 Air quality is a key issue for the District. The Council is preparing an Air Quality Plan which will protect and enhance the health of everyone who lives, works or spends time in the District. The plan will show it plans to bring the levels of nitrogen dioxide within legal limits in the shortest possible time. Measures proposed include the creation of a Clean Air Zone (CAZ).

- 7.1.25 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

- 7.1.26 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.
- 7.1.27 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.

City Region, Duty to Cooperate and Partnerships

- 7.1.28 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.
- 7.1.29 More recently, the Government announced a mayoral devolution deal for West Yorkshire. This involves giving a newly elected mayor and mayoral combined authority control over annual £38 million investment fund as well as new powers over transport, education and housing.
- 7.1.30 The Duty to Cooperate requires the Council to work closely with neighbouring local authorities such as Leeds City Council and 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 sub-regional working groups.
- 7.1.31 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.

- 7.1.32 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 out the approach to joint working across the city region on planning matters.
- 7.1.33 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 Bradford.

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

- 7.1.34 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.
- 7.1.35 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, and
 - promoting sustainable development.

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

- 7.1.36 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, and
- monitoring the actual effects of the plan during implementation.

7.1.37 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.

7.1.38 The SEA/SA will be fully integrated into the production of all the DPDs from the start, in line 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

7.1.39 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), and
- Bradford District Local Infrastructure Plan (LIP) Update (2021).

7.1.40 For more details see following link: [Bradford District Local Plan | Bradford Council](#).

- 7.1.41 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

Managing resources

- 7.2.1 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.
- 7.2.2 Further resources are available within the Planning Service, including the Landscape, Conservation, Highways and Design Group.
- 7.2.3 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.
- 7.2.4 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.
- 7.2.5 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.
- 7.2.6 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, and
 - examination and adoption.
- 7.2.7 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. The current estimated minimum financial requirement for completion of the Local Plan as set out in this LDS is £1.1m. This is profiled as follows:

Local Plan cost projections					
DPD	2021/22	2022/23	2023/24	2024/25	Total
Local Plan	800,000	150,000	160,000	0	1,110,000

- 7.2.8 The Local Plan has benefited by non-recurring corporate financial support in previous year's budgets in order to progress the work in line with the 2018 LDS. The balance of the funding available is £652K which will support the work. 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 in order to ensure progress to adoption.

7.3 Programme Management

- 7.3.1 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.
- 7.3.2 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, and
 - Culture, Tourism and Sport.
- 7.3.3 A new advisory cross party Local Plan Reference Group is proposed to be established to provide opportunity for wider sounding on emerging content and approach ahead of any formal consideration by Executive and Full Council.

7.4 Political Management

- 7.4.1 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, and
- Full Council resolution required for adoption stages.

7.4.2 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, and
- The Executive to approve for adoption by Regulatory and Appeals Committee.

7.4.3 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.

7.5 Risk Assessment

7.5.1 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 5: RISK ASSESSMENT

Risk	Nature of Impact	Impact L/M/H	Probability L/M/H	Mitigation /Contingency
Change to national policy and legislative framework.	Additional work to comply with new policies causing slippage	H	M	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 Cooperate. Duty requires ongoing positive engagement with key bodies such as adjacent Councils on cross boundary issues in the Local Plan.	Slippage Soundness	M	M	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. 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	M	M	Allow for a challenging but realistic timetable for Local Plan documents with a degree of flexibility built in. 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

Risk	Nature of Impact	Impact L/M/H	Probability L/M/H	Mitigation /Contingency
				use of consultants on specialist areas.
Lack of in-house skills for specialised areas of policy work /sustainability appraisal /background studies.	Slows progress in programme Evidence base compromised	M	M	Undertake a competency audit for key programme areas and identify gaps linked to project plans for each DPD. Review other Council resources. Commission external support for one off projects
Local Plan Team required to undertake other unforeseen work.	Programme slippage	M	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 to programme slippage	H	M	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	H	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 L/M/H	Probability 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 sound at examination due to failure to show deliverable plan	M	M	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	H	M	The capacity of PINS is not something that the Council can directly influence. On-going liaison with MHCLG and PINS regarding the programme and key milestones.
Local Plan fails soundness test.	Local Plan not adopted	H	L	Ensure DPDs are sound by ensuring robust 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 quashed in whole or in part	H	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	Weaken evidence to	M	M	Close liaison with all key stakeholders involving sending

Risk	Nature of Impact	Impact L/M/H	Probability L/M/H	Mitigation /Contingency
and bodies to cope with demand and fail to deliver on time.	underpin Local Plan at key stages Slippage of programme			them a copy of the LDS and involve them in planning the key stages at the earliest opportunity so they can 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 programme Programme slippage	M	M	Make planning central to delivery of Corporate objectives. 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.
Inability to recruit external contractors.	Programme slippage Weaken evidence base	H	M	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.