

LOCAL DEVELOPMENT SCHEME

2023-2026



March 2023

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1 Foreword

1.1 The Local Development Scheme (LDS) is a public statement setting out the Council's project plan for preparing development plan documents. It sets out the scope and programme for the preparation of these documents and establishes the framework for delivering the spatial planning strategy for the borough.

1.2 Following recent monitoring of the scheme, it has become necessary to update the programme to cover the next 3 years (from 2023-2026) to ensure that the Council has an appropriate development plan framework in place that reflects national and London Plan policy requirements.

1.3 The Council's current planning policy framework is made up of the Core Strategy (adopted 2012), Development Management Policies (adopted 2013) and Area Action Plans for Walthamstow Town Centre (adopted 2014) and Blackhorse Lane (adopted 2015).

1.4 Since the adoption of the LDS, good progress has been made on the preparation of the new Local Plan. The Council consulted on the Direction of Travel document (Regulation 18 - Issues and Options stage) in 2017 and a full Draft Plan (Shaping the Borough) was published for consultation during July - September 2019. This is in addition to the preparation and adoption of a revised Statement of Community Involvement (December 2018), and Supplementary Planning Documents on South Grove/ St James (May 2017) and Planning Obligations (May 2017). The Local Plan (Strategic Policies Document) became known as LP1 and went for its statutory Regulation 19 consultation between November - December 2020. The Plan was submitted with a schedule of proposed changes in April 2021. A Draft Site Allocations Document; LP2, was consulted on between September 2020 to December 2020. A Regulation 19, pre-submission version of this document was consulted on between November 2021 - January 2022. Following submission to the Planning Inspectorate in April 2021, two planning inspectors were appointed by the Secretary of State to conduct an Examination in Public. The Council received the [Inspectors Preliminary Matters](#) in June 2021.

1.5 In March 2022 there was a two-week hearing session to discuss the matters raised in the Local Plan. Following this, the inspector wrote a follow up letter to the Council in May 2022 setting out four key options on how to progress the Local Plan. The Council agreed an approach with the Inspectors and produced a Local Plan Topic Paper and supporting Evidence Base in the summer of 2022. Following this, the Inspectors submitted a statement detailing further matters that needed to be resolved. The Council Submitted their reply to the further matters in January 2023 and a further week of Hearing Sessions for LP1 are scheduled for March 2023. There will be a further round of Reg 19 pre-submission consultation on the LP2 in Autumn 2023. Moving forward, this document provides information on the Local Development Documents the Council intends to produce in the next 3-year period.

1.6 For further information on this document contact:

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2 Introduction

2.1 The Council is required by section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) to prepare and maintain a Local Development Scheme (LDS). The LDS must be revised when the Council considers it appropriate to do so (section 15(8)).

2.2 The LDS must specify —

- (a) the local development documents which are to be development plan documents.
- (b) the subject matter and geographical area to which each development plan document is to relate.
- (c) which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities.
- (d) any matter or area in respect of which the authority has agreed (or propose to agree) to the constitution of a joint committee under section 29; and
- (e) the timetable for the preparation and revision of the development plan documents.

2.3 There are no statutory consultation requirements necessary for the preparation of a LDS. A resolution of Full Council required in order to bring a LDS into effect (section 15(7)) and that resolution must specify the date from which the scheme is to have effect. The Secretary of State or the Mayor of London has the power to direct the Council to make such amendments to the LDS as they think appropriate for the purpose of ensuring full and effective coverage (both geographically and with regard to subject matter) of the authority's area by the development plan documents (taken as a whole) for that area.

2.4 This document is a revision to the Local Development Scheme for Waltham Forest adopted March 2020. It sets out the Development Plan Documents (DPDs) the Council intends to prepare over the next 3 years and their timetable.

2.5 This document sets out the timetable for the following emerging documents:

- Waltham Forest Local Plan (Shaping the Borough) LP1
- Waltham Forest Local Plan (Site Allocations) LP2
- Supplementary Planning Documents

2.6 Copies of this LDS can be obtained from the Council or viewed via the Council's website: [Waltham Forest Local Development Scheme](#).

2.7 Progress on the LDS will be reviewed as part of the Council's annual monitoring process (the Authority Monitoring Report) and in the light of further advice or regulations received from the Government.

Purpose of the Local Development Scheme

2.8 The Waltham Forest LDS has the following purposes:

- To establish and reflect the Council's priorities and enable work programmes to be set for the preparation of Development Plan Documents;
- To provide a brief description of the Development Plan Documents to be prepared and the content and geographic area to which they relate;
- To set out the planned timetable for preparing each Development Plan Document and the key milestones to be achieved, and;
- To provide an explanation of how progress against the Local Development Scheme will be monitored.

3 The Waltham Forest Local Plan

3.1 The Waltham Forest Local Plan deals with spatial issues - relating to land use and physical development. It seeks to co-ordinate and plan for the range of activities likely to affect spaces, including transport, environment, education, housing, employment, health, shopping etc, also integrating the other policies and programmes of other government departments/agencies and other key players whose activities also contribute in 'place shaping' the borough.

Spatial Development Strategy - The London Plan

3.2 The London Plan is part of the development plan for Waltham Forest. It provides the strategic, London-wide context within which all London Boroughs must set their detailed local planning policies. Accordingly, policies in the Local Plan need to conform to the London Plan. A new London Plan was adopted in March 2021.

Existing Development Plan Documents

Core Strategy

3.3 This document was adopted on 1st March 2012. It was prepared under the previous system of Local Development Frameworks requiring the preparation of a Core Strategy supported by a suite of other development plan documents (DPDs) and supplementary planning documents (SPDs). It currently provides the broad overarching policy document for decision making on planning applications.

3.4 Paragraph 33 of NPPF 2019 mentions that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

Development Management Policies DPD

3.5 This document translates the strategic policies in the Core Strategy into more detail to be used in assessing planning applications. It is supported by a Policies Map. This document was adopted in October 2013.

Area Action Plans

3.6 Area Action plans have a geographic dimension focused on smaller areas of the boroughs - setting out areas in which change is expected. Area Action Plans have already been adopted for Blackhorse Lane (adopted January 2015) and Walthamstow Town Centre (adopted October 2014).

North London Waste Plan

3.7 The Council worked in cooperation with the North London Boroughs of Hackney, Enfield, Haringey, Barnet, Camden and Islington to prepare a Joint Waste Plan Document for North London which was adopted in March 2022.

Supplementary Planning Documents

3.8 Supplementary Planning Documents can cover a wide range of issues and provide detailed guidance to supplement the policies in a Development Plan Document. They are a material consideration in determining planning applications. Details of the SPDs the Council currently intends to produce are set out in section 4 of this document.

3.9 Key stages for the production of SPDs, and how the Council intends to involve the community and relevant stakeholders, are set out in the Council's Statement of Community Involvement (Adopted December 2018)

Neighbourhood Plans

3.10 Under the Localism Act, community organisations have power to draw up plans for their area that are in conformity with the Local Plan. In July 2014, the Council designated the Highams Park Planning Group as the Neighbourhood Forum with responsibility for preparing a Neighbourhood Plan for Highams Park. The Highams Park Neighbourhood Plan was adopted in May 2020. Currently, this is the only designated neighbourhood forum in the borough and the only adopted Neighbourhood Plan.

3.11 Going forward, it is expected that additional community groups may come forward with a desire to prepare such plans for local areas. The Council has a legal duty to support neighbourhood planning projects as and when they come forward.

3.12 Key stages for the production of Neighbourhood Plans, and how the Council intends to assist community groups in preparing such plans, are set out in the Council's Statement of Community Involvement (Adopted December 2018).

Authority Monitoring Reports

3.15 The Council is also required to produce an Authority Monitoring Report (AMR). The purpose of the AMR is to assess the implementation of the Local Development Scheme and the extent to which policies in Local Development Documents are being achieved.

3.16 During the 3-year period of this LDS, it is intended to publish AMR documents periodically on key topic matters.

Sustainability Appraisal

3.17 The Planning and Compulsory Purchase Act 2004 requires Development Plan Documents to be subject to a Sustainability Appraisal, which incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive. These are tools that ensure that policies in Development Plan Documents promote sustainable development and take into account the effects of development on the environment.

3.18 Accordingly, the process of preparing documents needs to:

- Identify sustainability issues and problems;
- Collect base-line monitoring information;
- Predict significant effects more thoroughly;
- Secure greater consultation with the public and environmental authorities;
- Address and monitor the significant effects of the plan.

3.19 As part of the process, the Council must:

- Prepare a sustainability report on the significant effects of options and the draft plan;
- Carry out consultation on the draft plan and accompanying sustainability report;
- Take into account the sustainability report and the results of consultation in decision-making;
- Provide information when the plan is adopted and show how the results of the sustainability appraisal and SEA have been taken into account.

3.20 To achieve this, a scoping report was produced in 2017 (published for consultation July - August 2017 and finalised September 2017). This set out issues, indicators and objectives providing the framework for testing the sustainability credentials of future Local Plan documents. Following this, a Sustainability Appraisal for the Regulation 18 Version of the Local Plan (LP1 and LP2) was produced in Autumn 2019. A sustainability Appraisal for LP2 was produced in Autumn 2020. Further to this a Sustainability Appraisal Report Addendum was published in September 2022.

3.21 Development Plan Documents are also subject to Appropriate Assessment (under the amended Habitats Regulations) to ensure proposals do not harm sites of international conservation value. A Habitats Regulations Assessment (HRA) was prepared in Autumn 2020, with a further document being produced for Spring 2021. However, to mitigate Air Quality and Recreation Impact Pressures identified in the Epping Forest SAC, further assessment has been required at various stages to ensure that proposals coming forward in the Local Plan do not adversely affect the current condition of the Forest.

3.22 This ensures that all Development Plan Documents are based on a thorough understanding of the borough's needs and of the opportunities and constraints affecting it. In assembling an evidence base, the Council will look to previous research in the borough as well as to new work and will draw on inputs from local organisations and stakeholders. The list of evidence based projects undertaken and currently in progress are as follows:

3.23 Evidence base documents are published on the Council's [Local Plan Evidence Base webpage](#). This list will be updated as and when new information becomes available.

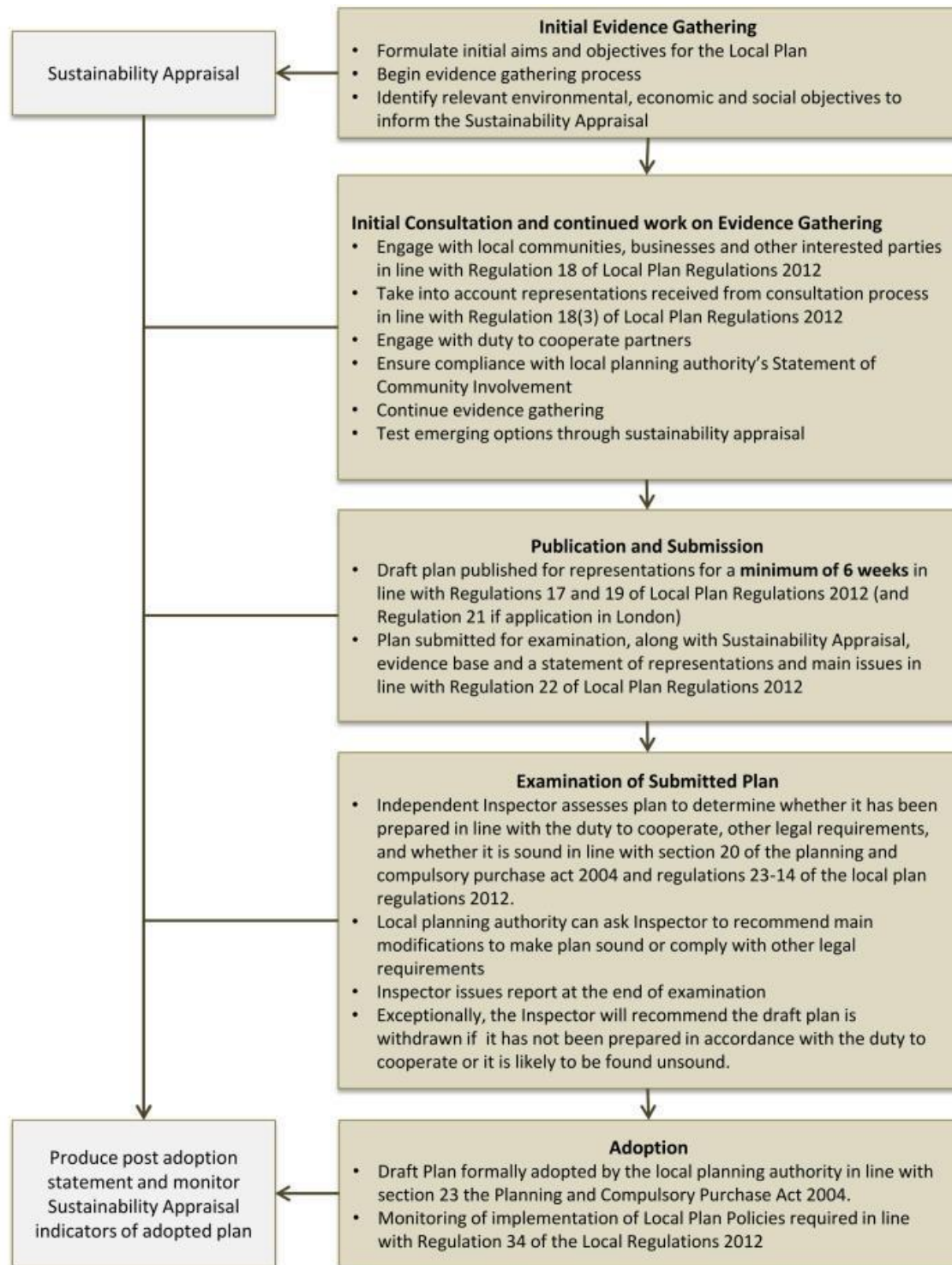
4 The Planning Making Process

The Plan Making Process

4.1 The key stages for the production of a Development Plan Document (DPD) essentially involves the following stages:

- Evidence gathering
- Preparation of the DPD and consultation
- Publication of the DPD and consultation
- Submission of the DPD to the Secretary of State for examination
- Receipt of the Inspector's Report
- Adoption of the DPD

4.2 A detailed description of the process is set out below. The Statement of Community Involvement (adopted 2018) sets out how the Council intends to involve the community and relevant stakeholders in plan preparation.



Equalities and Diversity

4.3 An equality impact assessment (EqIA) is an evidence-based approach to ensure that proposal policies, practices, and decision-making processes are fair and do not present barriers to participation or disadvantage for protected groups.

4.4 The Equality Impact Assessment (EqIA) analyses the policies/proposals included in the Development Plan Documents to assess their effects on people with protected characteristics covered by the Equality Act 2010. There are three aims of the Equality Act, these are:

- a) Eliminate Unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the act.
- b) Advance Equality of Opportunity, between people who share protected characteristics and those who don't.
- c) Foster Good Relations, between people who share a protected characteristic and people who do not share it.

4.5 A judgment has to be made as to how each of the policies and proposals would impact positively or negatively on the identified equality groups. Protected characteristics include age, sex, religion/belief, race, gender reassignment, sexual orientation, pregnancy and maternity and disability. This assessment also considers marriage/civil partnership and lower income communities as separate groups. As background the Equality Act 2010 identified the following:

- a) **Age:** this refers to persons defined by either a particular age or a range of ages;
- b) **Sex/Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- c) **Ethnicity/Race:** Refers to protected characteristics of race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- d) **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- e) **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities;
- f) **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- g) **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- h) **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- i) **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favorably than married couples.

- j) **Lower income communities:** Communities with individuals living in a household with a) an income below 60% of the median household income in the year, b) high crime and violence rates, and c) an inadequate school system.

4.6 Local authorities are required by legislation to undertake an Equality Impact Assessment (EqIA) when reviewing or developing new policies and strategies. Each of the documents set out above will have a bespoke EqIA completed, which will consider their impact on groups with protected characteristics.

4.7 The approach undertaken in the EqIA will draw on guidance for the appraisal of equality impacts produced by the Equality and Human Rights Commission (EHRC).

4.8 Place and Design and Strategic Area Regeneration are working with Strategy and Change team to review the Council's current EqIA process and revise the EqIA template/form. The aims and objectives of this review are:

- Testing accessibility of the tool with Digital colleagues to ensure best practice;
- Agreeing and testing a draft template on upcoming SPDs and Regeneration projects;
- Ensuring we have up-to-date data to aid completion of the EqIA (linking to the Intelligence Hub on the intranet)
- Sighting Portfolio Leads on completion of EqIA and building this into the sign-off process for scrutiny/Cabinet reports to avoid a tick-box approach

5 Review of the Local Development Scheme

National Planning Policy Changes

5.1 Since the adoption of the 2020 LDS, there have been changes to the National Planning Policy Framework (NPPF). The NPPF was revised in July 2021 with a focus on the design quality of places, rather than just the individual development. The key change is Local planning authorities have a statutory duty to prepare and update local plans for their area. The government has provided further details on its expectations for plan making in Planning Practice Guidance. The Secretary of State has extended powers to intervene in plan making where progress is unsatisfactory.

5.2 Key changes for plan making arising from the latest NPPF (2021) include the following:

- A much greater focus is placed on making ‘beautiful’ and ‘sustainable’ places, and the use of plans, design policy, guidance and codes is hugely encouraged. For example, Paragraph 128 (previously 126) sets out that “all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.
- Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places
- Strategic policies in the plan document should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, including planning for and allocating sufficient sites to deliver the strategic priorities of the area;
- Additionally, a new insertion to paragraph 22 sets out that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

5.3 These national drivers for change must be considered in preparing the Local Plan.

The London Plan

5.4 The London Plan is part of the development plan for Waltham Forest. The Council's Local Plan must be in conformity with the London Plan. A new London Plan was adopted in March 2021.

Progress made on the Local Plan

5.5 Despite the above influences from the NPPF and the London Plan, key achievements made towards the preparation of the Council's new Local Plan have been as follows:

1. Publication of the Local Plan Direction of Travel Document (Regulation 18 - Issues and Options consultation 6 November - 22 December 2017)

2. Completion of key evidence base studies

- Strategic Housing Market Assessment
- (2017) Growth Capacity Study (2018)
- Characterisation and Intensification Study
- Employment Land Study (2019)
- Town Centres and Retailing Study (2019)
- Strategic Flood Risk Assessment - Level 1 (2018)

3. Key Documents

- South Grove/ St James Street Supplementary Planning Document (2017)
- Planning Obligations Supplementary Planning Document (2017)
- Affordable Housing and Viability Supplementary Planning Document (2018)
- Statement of Community Involvement (2018)
- Authority Monitoring Report - Housing (2017-18)
- Publication of a draft Local Plan (LP1) for consultation (Reg 18) (July- September 2019)
- Publication of a draft Local Plan (LP1) for consultation (Reg 19) (November - December 2020)
- Consultation on Draft Local Plan Site Allocations Document (LP2) (Reg 18) (September- December 2020)
- Consultation on Pre- Submission Local Plan Site Allocations Document (LP2) (Reg 19) (November 2021 - January 2022)
- Submission of Local Plan (LP1) (Reg 19) and Schedule of Proposed Changes (April 2021)
- Receipt of Inspectors Preliminary Matters (June 2021)
- Two-week Local Plan Hearing Session (Examination in Public); (March 2022)
- Receipt of Inspectors follow-up letter (May 2022)
- Local Plan Topic Paper and Supporting Evidence Base (September 2022)
- Reply to Inspectors Further Matters; (Jan 2023)
- Local Plan Hearing Sessions 2 (March 2023)

5.6 Progress has also been made on community led initiatives in accordance with the Assets of Community Value (ACV) Regulations and also the Neighbourhood Planning Regulations. So far, the Borough has listed 56 properties on the Council's ACV Register.

Next Steps

5.7 The previous planning strategy (LDS 2017) sought to prepare a single consolidated Local Plan supported by Supplementary Planning Documents. The intention was to prepare a focused and concise document with policies kept at a more strategic level supported by the use of Supplementary Planning Documents (SPDs). Other non-statutory types of documents to be prepared included vision documents/masterplans, development briefs, and design concept statements where necessary.

5.8 Consultation work on the emerging plan has however indicated the need to provide greater details on site specific proposals. The Council's challenging growth target from the London Plan from previous requirements means that land must be used intensively and growth well managed to fit within the existing built-up areas also managing the impact on local character. In this context, the Council considers that a supporting Site Allocations Document would have an important role in managing development expectations on identified strategic sites to meet the current and future needs. Accordingly, the revised LDS proposes the preparation of the new Local Plan in two parts:

- LP1: Local Plan - Shaping the Borough
- LP2: Local Plan - Site Allocations

5.9 The Council has been worked collaboratively with other North London Boroughs on the preparation of the North London Waste Plan. This was adopted in March 2022.

5.10 The revised LDS (2023-2026) seeks to acknowledge the above influences on the timetable for the delivery of the new Local Plan.

6 Programme for 2023-2026

Development Plan Documents

6.1 This LDS proposes the preparation of two Development Plan Documents. These will update and carry over (where justified) all existing policies currently included in the adopted plan/emerging plan documents including the Core Strategy, Development Management Policies and the Area Action Plans. These documents will be supported by use of Supplementary Planning Documents (SPDs). Other non-statutory types of documents including Masterplans, Planning Briefs, and Design Concept statements will also be used wherever possible.

6.2 The main plan documents to be produced over the next few years are:

- LP1: Waltham Forest Local Plan - Shaping the Borough
- LP2: Waltham Forest Local Plan - Site Allocations
- Green Spaces and Places - SPD
- Industrial Intensification - SPD
- Developer Contributions - SPD
- Exemplar Design - SPD
- Retrofit, Residential Extensions and Alterations – SPD
- Leyton Mills (New Spitalfields, Leyton Mills Retail Park, Eton Manor, Temple Mills) - SPD
- Blackhorse Lane Strategic Industrial Location (SIL) - SPD

6.3 A summary of the timetable is described in the table below.

Waltham Forest Local Development Scheme 2023-2026

Document	Initial consultation (Regulation 18)	Draft Plan - (Preferred Options)	Proposed Submission (Regulation 19)	Submission (Regulation 22)	Examination (Regulations 23-25)	Adoption (Regulation 26)
Waltham Forest Local Plan - Shaping the Borough (LP1)	Completed (November - December 2017 - Direction of Travel Issues and Options Document published for consultation)	Completed (July - September 2019 - Draft Local Plan published for consultation)	Summer 2020	Spring 2021	Spring 2022	Summer 2023
Waltham Forest Local Plan Site Allocations Document (LP2)	Early Engagement (Pre-production stage) - Spring 2020 Consultation on Draft Site Allocations Document (Regulation 18) - Summer/Autumn 2020		Autumn/Winter 2021	Summer / Autumn 2023	Winter 2023	Spring / Summer 2024
North London Waste Plan	Completed July- September 2015		Completed January-February 2019	Completed June 2019	Autumn 2021	March 2022
Green Spaces and Places SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Industrial Intensification SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Developer Contributions SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Exemplar Design SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Retrofit, Residential Extensions and Alterations SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Leyton Mills SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023
Blackhorse Lane SIL SPD	Summer 2023		NA	NA	NA	Autumn/Winter 2023

7 Project Management, Risk Assessment and Monitoring

Resources

7.1 Work on the Local Plan will continue to be undertaken by the Council's Place and Design Team. The work of the team covers Local Plan preparation, Infrastructure Planning, Community Infrastructure Levy, Section 106, Research & Monitoring, Assets of Community Value and support for Neighbourhood Planning. Support is being provided by other Council teams including Area Regeneration and Development Management.

7.2 The Corporate Director for Regeneration, Planning and Delivery supported by the Assistant Director - Place and Design will have primary responsibility for the production of Development Plan Documents and Supplementary Planning Documents. Where necessary, project groups will be formed to carry out day-to-day work on individual documents. Other Directorate and Council staff resources will be drawn upon to augment these project groups as referred to above.

7.3 Evidence based projects on topic related matters and sustainability appraisal/strategic environmental assessment work will be undertaken with consultancy support.

7.4 Contingency funding has been put in place to cover the likely additional costs of external resources (e.g. consultants), consultations, public examinations, etc., expected to be needed during their preparation. These will be kept under review through the Council's budget monitoring and performance management procedures.

7.5 The profiles in section 6 of this document set out the management responsibility for the preparation of each document. With the exception of the North London Waste Plan, which has its own governance arrangements through the Heads of Planning and the Members Planning Group of the partnership boroughs, all documents will be directly overseen by the Corporate Director for Regeneration, Planning and Delivery.

7.6 Political overview will be through regular meetings of the Portfolio Holder. For each Development Plan Document (DPD), approval of draft documents at the early consultation stage (Preferred Options/draft plan, will be via the Portfolio Holder. Final versions of all DPDs and SPDs will be approved by the Council's Cabinet. At these stages, reports may be called for further consideration through the Council's Scrutiny Committees.

7.7 In preparing this Local Development Scheme a number of areas of risk have been identified together with a consideration of mitigating actions. These are listed in the table below.

Risk Assessment

Table 7.1

Risk/Description	Inherent Risk		Mitigating Controls	Residual Risk	
	Likelihood	Impact		Likelihood	Impact
1. Changes to the National Planning Policy Framework, planning system changes and other legislative changes - requiring additional work to be undertaken leading to delays and programme slippage.	Probable	Significant	<ul style="list-style-type: none"> Regular monitoring of national policy changes proposed. Changes to the planning system/ new national policies to be applied at the earliest opportunity. 	Possible	Moderate
2. Insufficient staff resources/staff turnover. Reduced capacity within the team as a result of staff leaving, recruitment difficulties, sickness etc could result in slippage.	Probable	Significant	<ul style="list-style-type: none"> Use Agency staff on temporary basis to cover vacant posts as and when they occur. 	Unlikely	Minor
3. Increased costs/Insufficient Budget - leading to abandonment of the project or key aspects of the programme compromised for this reason. This could lead to programme slippage, risk that the Local Plan may be found unsound at examination. There could be additional costs if there is a legal challenge to the plan.	Possible	Major	<ul style="list-style-type: none"> Ensure the Local Plan and SPD programme are recognised as a key Council priority for corporate funding. Safeguard the Local Plan budget from cuts. Ensure regular monitoring of the Local Plan Budget with Finance Team to ensure that any pressures are identified early. 	Unlikely	Minor

	Inherent Risk			Residual Risk	
4. Political processes/changes arising from national/local elections, purdah periods, and changed political priorities - leading to programme slippage, fundamental change in the approach and direction of the Local Plan and abortive work. This is particularly mindful of current political uncertainties associated with Brexit. The main influence of EU law on plan making in the UK relates to the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations').	Probable	Significant	<ul style="list-style-type: none"> • Programme timetable adjusted to take into account the Purdah period associated with the 2018 Local Government Elections, but it is impossible to predict other Purdah periods likely to occur during the LDS period. • How existing EU Directives and Regulations may be affected by Brexit depends to some extent on the terms reached with the EU as part of Brexit negotiations. It is impossible to predict at this stage changes to plan making requirements arising from Brexit. • Active member involvement (cross party approach) is proposed through the Local Plan Members Advisory Panel (LPMAG) at all stages of the Local Plan process. 	Possible	Moderate
5. Significant public opposition to the Local Plan - leading to unexpected higher volume of work in dealing with objections and therefore resulting in programme slippage.	Possible	Significant	<ul style="list-style-type: none"> • An online consultation system is in place to manage the volume of comments/ representations and ensure faster processing time in recording, collating and analysing consultation responses. • Provide additional staffing capacity through the use of temporary Agency staff to support this work as may be required. • Front load public consultation work and build consensus through proactive consultation and engagement with stakeholders and the local community. 	Unlikely	Minor

	Inherent Risk			Residual Risk	
6. Delays at the examination stage - leading to slippage at adoption stage.	Possible	Significant	<ul style="list-style-type: none"> • Ensure a Service Level Agreement with the Planning Inspectorate commits to agreed target dates for the completion of the examination and the delivery of the Inspector's report. • Apply PAS Self-Assessment tools to check compliance with all requirements prior to submission for examination. • Seek a critical friend assessment of the Local Plan prior to submission for examination. 	Unlikely	Minor
7. Risk of legal challenge to the Plan (s.287 of the Town and Country Planning Act 1990) - delaying the adoption of the Plan.	Possible	Significant	<ul style="list-style-type: none"> • Ensure that the Local Plan has been duly made in accordance with all legislative requirements. • Ensure that the Local Plan is built on sound, robust and transparent evidence base and is deliverable. 	Unlikely	Minor

Monitoring and Review

7.8 Progress on the preparation of Development Plan Documents and Supplementary Planning Documents will be monitored annually through the Authority Monitoring Report Monitoring (AMR). This report will:

- Specify how the Council is performing against the timescales set out within the Local Development Scheme and make changes to the timetable as may be required;
- Provide information on the extent to which adopted policies are achieving their intended goals;
- Propose updates to the Local Development Scheme - in particular new supplementary planning documents as may be considered necessary.