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1. Hull Local Development Scheme

What is the Local Development Scheme (LDS)?

- 1.1 This Local Development Scheme (LDS) is the first point of contact for anyone wishing to find out about which planning policy documents are relevant in Hull, and their status. The plan making process is complicated and can difficult to navigate for non-planners. To that end, this LDS clearly sets out the documents that comprise the Development Plan for the city including timetables for those that are being produced, alongside evidence base documents that support it. This ensures local communities and interested parties can keep track of progress and to understand the wider plan making context. Wherever possible non-technical language is used but where this is unavoidable such terms are either explained where they are first referred to or are included within a glossary at the end of the document.
- 1.2 A Local Development Scheme is required under Planning Law.⁽¹⁾ This must specify (among other matters) the documents which, when prepared, will comprise the Development Plan for Hull.

The Development Plan

- 1.3 The statutory 'Development Plan' for the city comprises a number of different documents as outlined below:
- 1.4 The adopted [Hull Local Plan](#) sets out a vision and a framework for the future development of the city, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. The plan also provides development policies and allocations for the whole city. The Local Plan comprises a written statement setting out a broad range of policies and related planning priorities and a city wide policies map.
- 1.5 The [Kingswood Area Action Plan \(AAP\)](#) guides the development of this major growth area of the city, setting out a clear delivery framework for some of the important infrastructure requirements as well as phasing of some of the housing development elements. The local plan reflects this AAP within its policy map, but makes clear how land supply, town centre roles etc can be considered in relation to the city as a whole.

1 Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).

The AAP remains an adopted Plan and therefore must be considered as a part of the Development Plan as a whole for the city until such time that it is superseded, for example through update of the Local Plan.

- 1.6** The **Newington and St Andrews (NaSA)** and **Holderness Corridor (HRC) AAPs** were created largely to steer and provide a framework for housing market renewal activities within certain areas of the city. They were produced ahead of the Local Plan which in turn superseded and updated most parts of these AAPs. Some elements are saved and the Local Plan lists these within an appendix. These elements remain material considerations in determining planning applications in these areas.
- 1.7** The [Hull and East Riding Joint Minerals Local Plan](#) was adopted 21 November 2019 and remains up to date and is not being reviewed as part of the wider Local Plan update process.
- 1.8** The **Hull and East Riding Joint Waste Local Plan** was adopted November 2014. The policy framework for Waste will now be incorporated within the overall Local Plan rather than a separate Plan.
- 1.9** **Neighbourhood Plans** provide local communities with an opportunity to create a shared vision for the future development and growth of their area. Such plans need to be in broad conformity with national planning policy and with the policy established locally in the development plan. Once adopted, they become part of the wider development plan for the area.
- 1.10** There has been some local interest in the production of neighbourhood plans in the city. A neighbourhood plan was prepared for the Thornton area and received endorsement including through formal examination but was voted down through final referendum so did not become part of the statutory development plan for the city. Preparation of a neighbourhood plan was also commenced for the Newington area but this did not progress. The Council will continue to be proactive and positive about neighbourhood planning, working collaboratively with communities where they choose to prepare a plan, and to ensure complementary neighbourhood and local plan policies are created. Further guidance on neighbourhood planning can be found on the Locality Website. and further information about neighbourhood plans in the city are available on the Council's website
- 1.11** There are a number of other documents which although not part of the statutory Development Plan, do sit alongside and complement the above documents. These are outlined below:

Supplementary Planning Documents

- 1.12** Supplementary Planning Documents (SPDs) expand on existing policies in the Development Plan providing guidance for how they should be implemented. The preparation of such documents follows statutory procedures and once adopted they carry weight when the Council makes decisions on planning applications. A list of adopted SPDs is set out on the Council's [web site](#) as well as a 'live' position for emerging SPDs.

Statement of Community Involvement

- 1.13** An updated Statement of Community Involvement (SCI) was adopted in July 2021. This sets out the processes by which stakeholders and the community in general will be engaged in the preparation of planning documents. The SCI also sets out how the stakeholders and the wider community will be engaged in the consideration of development management decisions. The SCI has been reviewed to reflect experiences of people using the planning service, updated regulations and guidance (including around the accessibility of documents and to address the growing need to make use of electronic means of communication). It has particularly focused on lessons learned during the COVID-19 pandemic and the Government's shifting focus on making greater use of technology. The updated SCI is available to view on the Council's website.

Community Infrastructure Levy

- 1.14** The Council adopted a *Community Infrastructure Levy* (CIL) charging schedule in January 2018 and also continues to use legal obligations to achieve a number of priorities, particularly around provision of open space and public realm facilities. An Infrastructure Funding Statement is published annually that sets out details about CIL and planning obligation receipts and spend on projects. This can be found on the Council's [website](#)

Wider Council Priorities / Strategies

- 1.15** The Local Plan presents a means of implementing the Council's key strategies and those of its partners through the development and use of land across the city
- 1.16** The most recent of these include:
- [Hull Climate Emergency](#)
 - [Hull City Plan](#)
 - [Hull Economic Strategy](#)

- [Hull Housing Strategy](#)
- [Health and Well Being Strategy](#)

Monitoring

- 1.17** The [Authority Monitoring Report \(AMR\)](#) provides opportunity for the whole range of policies within the plan to be monitored to assess their implementation and effectiveness, or potential need for review or amendment. The AMR also reviews progress against the milestones set out in the LDS (this document). This is produced annually.
- 1.18** In relation to housing, the NPPF also requires local planning authorities to identify and update annually an assessment of housing land supply to meet the authority's five-year housing requirement. In Hull, this is reported through the AMR.
- 1.19** Evidence continues to be produced for other reasons, linked to the production of strategies by the Council or partner organisations. These also help to inform the continuing relevance and success of policies in this wider context.

Local Plan Update

- 1.20** National planning policy requires local plans to be kept up-to-date, recognising that different policies will age at different rates (potentially requiring a partial update).
- 1.21** The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, which came into effect in April 2018, has set a period within which an authority should undertake an assessment of whether its plan is up to date. This would need to be completed within five years of the adoption of the relevant local plan document. The Kingswood Areas Action Plan was adopted 15 September 2016 so will soon be beyond this five year period. Other area action plans are already largely superseded with policies saved within the current local plan but saved policies will need to be reviewed. The current local plan would by the same measure need to be reviewed for update by November 2022.
- 1.22** Further to the above, the Government has now set a requirement for all local authorities to have an up-to-date local plan adopted by December 2023. This target date is intended to encourage local authorities to produce up-to-date plans which are compliant with a broad range of new (and emerging) national planning policy. This effectively supersedes the regulatory timescales within which to commence review of the need to update the plan. To achieve this government deadline update of the plan would need to commence immediately.

- 1.23** This update (which is outlined further below) will focus on the Hull Local Plan. As part of this process it is intended that the Kingswood AAP and those remaining parts of the other two AAPs will be subsumed within this single document. It is intended that this will be a 'partial' update reflecting the fact that the plan is still relatively new and that many of the existing policies are considered to be effective and relevant. The Joint Minerals Plan has recently been updated and there is no need for a further review at this stage. A decision has been taken not to prepare a new Joint Waste Plan but rather to deal with relevant waste matters through the update of the Local Plan.
- 1.24** The need for a review of the Local Plan is driven by a number of different factors as outlined below.
- 1.25** National planning policy has changed since the plan was produced. The Government published a new NPPF in July 2018 (and updated February 2019).
- 1.26** The Government has also more recently published a White Paper 'Planning for the Future' in August 2020, proposing wholesale change to the planning system, including plan making. However it has been made clear that the suggested changes will take time to be enacted and for a new system to be adopted. Therefore activities to update plans should continue under the current planning legislation.
- 1.27** There have been other interim and incremental changes since publication of the White Paper that do bring clear pressure for update of policies however, including changes to the national methodology for establishing housing requirements (this didn't exist during preparation of the current local plan), and major change to the Use Class Order bringing greater flexibility for change amongst town centre uses which radically impacts the effectiveness of existing policies.
- 1.28** An initial assessment of the Local Plan (in light of the above mentioned national policy changes), experience of implementation since the plan was adopted and other significant factors (including the corporate commitment to the climate emergency) suggest that the partial update of the plan should focus on:
- Ensuring that the plan as a whole supports the Council's climate change ambitions
 - Identifying new land for housing to meet the extended plan period (but accepting that the wider approach to housing remains relevant);
 - Considering how best to deal with prevailing trends in the commercial sector including the impact on the city centre and other identified centres of new national policy in light also of the effects of the global pandemic;
 - Providing a framework for satisfying the Government's ambitions regarding the importance of promoting high quality development.

- Re-emphasising the importance of planning to manage the risks and consequences of flooding and ensuring that in doing so, opportunities are taken to deliver multi-functional open space capable of acting as natural drainage infrastructure;
- Considering the scope to incorporate relevant policies from the Kingswood AAP as an alternative to updating that plan separately;
- Incorporating strategic waste policies previously contained within a separate joint Waste Plan.
- Ensuring the plan aligns with and gives full expression to the priorities of the Government's 25 Year Environment Plan, to be enacted through the Environment Bill.

1.29 The update also provides an opportunity for the Council to consider the implementation of existing policies in the plan and the extent to which amendments may be required to deliver more sustainable outcomes. A good example of this relates to the current HMO policy and the need to consider whether or not lower (or variable) thresholds should be introduced alongside other related adjustments.

Evidence Base.

- 1.30** A key test of the soundness of the local plan is that its policies are based on up-to-date and robust evidence.
- 1.31** A large evidence base was prepared to inform the current local plan and it will be necessary to update elements of this. There are also new and emerging issues that a reviewed plan will need to address and the scope of evidence required will therefore change to accommodate these.
- 1.32** Ongoing monitoring referred to above has already served to update some elements of evidence, particularly around development rates and land availability. The review of Council and other strategies has also required new evidence to be produced, or updates to existing, and this will also potentially inform preparation of the revised plan
- 1.33** Table A.1 outlines some of the key evidence that will need updating or preparing to inform review of the plan.

Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment

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

Conformity and integration with other plans

- 1.36** The Government sets out national planning policy in the National Planning Policy Framework (NPPF). The Local Plan must have regard to the policies within the NPPF and guidance within the National Planning Practice Guidance (NPPG).
- 1.37** The Duty to Co-operate ⁽²⁾ requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities, and to have regard to the activities of other prescribed bodies. Processes are in place and will be maintained to ensure the Council continues to satisfy the requirements of the Duty. (this is referred to further in the Council's Statement of Community Involvement).
- 1.38** The compact nature of the city's administrative area and single shared administrative boundary with the adjoining East Riding of Yorkshire points clearly to the important inter-relationship between these two areas. Hull has a history of successfully working together with the East Riding of Yorkshire on planning matters that are mutual concern, hence the previous publication of a Joint Planning Statement, and the focus now on the Statement of Common Ground, to ensure it reflects the strategic planning position of the two authorities and ensures Local Plan policies reflect that broader strategic framework. These will be reviewed and updated as the plan develops to address changing circumstances.

2 Section 33A(1) of the Planning and Compulsory Act 2004

- 1.39** The Council is also party to a Joint Strategic Planning Protocol. The protocol is between Hull City Council, East Riding of Yorkshire Council the Local Enterprise Partnership (LEP), the Humber Local Nature Partnership (LNP) and the Hull and East Riding LNP.
- 1.40** The protocol's objective is to ensure effective working relationships develop and operate on the consideration of planning applications for significant development. The intention is to support the delivery of the overarching strategic policies established within each authorities Local Plan. This protocol is due to be updated in 2021.
- 1.41** Hull City Council is currently consulting on a new Economic Strategy for the City. The Humber LEP was wound up in March 2021 and was replaced in April 2021 with the Hull and East Yorkshire LEP. As yet the LEP has not produced a new growth strategy but the Local Plan will need to be mindful of this document when produced and it will also provide the delivery framework for the aspirations and ambitions of the city's economic strategy.

Project Management

Plan making stages.

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

Table 1.1 Plan making stages

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

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

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

Figure 1.1 Plan making timeline

	2021						2022												2023																		
	July	August	September	October	November	December	January	February	March	April	May	June	July	August	September	October	November	December	January	February	March	April	May	June	July	August	September	October	November	December							
Hull Local Plan																																					

Resources

- 1.44** The Local Plan seeks to articulate the City Council and others priorities identified in the strategies and documents outlined earlier, where these impact on or can be implemented through the plans spatial vision, objectives and policy framework. Whilst the core responsibility for plan making will rest within the Planning Service, resources (both staff and financial) will need to be drawn from across the City Council to prepare and implement the local plan.
- 1.45** Close working with a range of stakeholders and partners will also be an important feature of the preparation of the local plan. The newly formed Hull and East Riding Local Enterprise Partnership (LEP) is an important driver for economic plans, and will draw heavily on the legacy of the Humber LEP and its strategies. The Humber and Hull & East Riding Local Nature Partnerships (LNPs) also play a key role, particularly informing cross boundary solutions for achieving biodiversity net gain and carbon offsetting.
- 1.46** The statutory Duty to Cooperate requires close collaboration between local authorities and specified public bodies on planning for strategic matters that impact across local authority administrative boundaries. There are important established relationships that help to support and inform plan making such as officer and member meetings between Hull and East Riding of Yorkshire and similar arrangements at the sub regional level such as the York, N Yorkshire, East Riding and Hull Heads of Planning group. Other 'thematic' groups such as the Living with Water (LWW) partnership which plays a key role in water management in the city and its surrounding catchment areas are of direct relevance.
- 1.47** A Local Plan Forum has previously been used to engage the support and input of people with interests in plan making. It is intended that this be reconstituted as an early priority in the process of updating the plan.
- 1.48** The Planning team will also actively engage with Area Committees and Ward Forums as a source of local issues and views as to potential solutions. Neighbourhood planning is undertaken by members of the community but with planning support by the Council to ensure conformity with the Local Plan.
- 1.49** Subject to the availability of resources, the nature of technical work to be undertaken and the requirements of specific timetables, external consultancy support is also likely to be required. The intention wherever possible will be to use in-house resources and only to resort to consultancies where work is of a specialist technical nature or where resources do not otherwise exist.

- 1.50** The use of digital technology will be maximised to bring as much efficiency as possible to the plan making process. This will also be used to maximise community and stakeholder engagement in the process and meet government objectives for digitising planning. The SCI provides greater details on digital engagement.

Risk Assessment

- 1.51** Priorities for the Government are to progress plan-making quickly, reduce red tape and save money, whilst promoting an effective and efficient planning system that stimulates investment, enterprise and community engagement.
- 1.52** Meeting demanding and on-going budget reduction targets (including those resulting from the pandemic), remains an overall challenge for the City Council as a whole, in the delivery of its strategic objectives and priorities, including the preparation of the local plan.
- 1.53** Also of relevance is the UK's departure from the European Union. Implications of this departure on planning will include the continuing status of former European legislation, impacts on inward investment and potential macro-economic impacts. The Humber ports may suffer more immediate impacts as movements of goods and resources adjust.
- 1.54** The Government's recent Planning White Paper and suggested changes to the system could be seen as presenting risk to progressing with the current format and scope of local plan. However guidance states that plan updates should be progressed. The requirement for preparing a revised plan by 2023 remains and major investment in the city continues to need a strong planning framework to guide success.
- 1.55** A detailed risk assessment is presented at Table B.1

A. Evidence requirements for plan update

Table A.1 Evidence requirements

Evidence	Why required
Strategic Housing Land Availability Assessment (SHLAA)	Evidence required to be produced and updated annually. It sets out detail of housing land supply and delivery.
Strategic Housing Market Assessment (SHMA)	The new national methodology will form the basis of the city's housing requirement. There will also need to be assessments of the need for affordable or other specialist housing.
Travellers Pitch Requirements	A review of the need for Traveller pitches etc. will potentially be needed.
Employment Land Review (ELR)	<p>Sets out current supply of land and site characteristics, as well as historic take up of land.</p> <p>Broader study includes projection of potential supply needs based on expected economic growth, including for different sector requirements. Future need projections will need to consider extensive work carried out to support the production of the Local Industrial Strategy.</p>
Retail and Town Centres Study / Leisure Study	<p>Projected growth or decline in retail spend, together with changes to shopping behaviour are likely to have significant impact on the broader range of uses within town centres and their future role.</p> <p>An update to the study will need to be scoped out to support review of the Local Plan. Changes to town centre policy and implementation of major projects will also impact on options to accommodate any future growth or address decline.</p> <p>Re-purposing of town centres will need a different focus for the scope of evidence beyond retail / leisure needs assessments.</p>

Evidence	Why required
District and Local Centre Surveys	Full surveys of uses and assessment of the roles of centres in the city have defined their characterisation within the Plan and policy designations. Significant change to the use class order as well as economic changes and structural changes to shopping habits will potentially lead to revision of the Local Plan approach.
Infrastructure Study	<p>The previous infrastructure study considered a range of infrastructure needs that potentially overlap with other policy areas. There has been significant investment in infrastructure since the adoption of the Local Plan with major projects commencing such as A63 improvements, flood defence and mitigation schemes etc. The scope of the study will potentially need to be revised to take account of any updates to evidence within the 'chapters' of the study, as well as infrastructure evidence prepared to inform the Humber LEP Local Industrial Strategy. The Infrastructure Delivery Programme will also need to be updated, partly linked to the implementation of any CIL funded projects.</p> <p>There are some new infrastructure projects emerging driven by climate change priorities, i.e. EV charging and District Heating and these will need to be addressed in a revised / updated Infrastructure Study.</p>
Local Wildlife Sites (LWS)	<p>The Local Plan identified 'candidate' Local Wildlife sites. Further assessment may be required to allow their full definition – need to determine how this sits with the requirements of Biodiversity Net Gain (BNG). Defra have produced a metric as the basis of measuring biodiversity and therefore to create baselines from which to assess gain.</p> <p>A Natural Capital study was prepared at a Strategic level</p>
Nature Recovery Networks	The adopted Local Plan builds on longstanding position in the city of maintaining green networks / corridors that link together spaces and bring together added value for nature and amenity. The concept of NRNs is new but can take forward evidence that supports these corridors.

Evidence	Why required
Waste Needs Assessment	New evidence is being prepared of future Waste Management needs to inform policy and potential allocations or designations where these are deemed necessary.
Minerals Local Aggregates Assessment	The Hull and East Riding Minerals Local Plan was adopted November 2019. This was supported by various evidence documents. The plan continues to be monitored and evidence updated. The Hull Local Plan currently has a policy designed to safeguard minerals infrastructure in the city. A question of whether this will need to be retained given the adoption of the Joint Plan post adoption of the Hull Local Plan.
Flood Risk	<p>The current Local Plan was supported by a SFRA and subsequent updates and amendments based on surveys of levels and modelling etc. New flood defences and mitigation infrastructure has been implemented which may bring further amendment to this evidence.</p> <p>The full list of evidence likely to support Local Plan policy includes</p> <ul style="list-style-type: none"> • Humber Comprehensive Review (replaces the Humber Strategy) • Strategic Flood Risk Assessment (due to be reviewed and updated when Humber Comp Review approved) • Blue Green Plan (currently in production) • 2020 Flood and Coastal Erosion Risk Management Strategy • Local Flood Risk Management Strategy • Flood Risk Management Plan
Building standards additional to Building Regulations.	The economic viability of development was assessed for various types, locations and policy requirements to define market areas in the city, as well as to determine whether policy requirements such as space standards, environmental / energy requirements etc. would be reasonable / sound – and therefore capable of adoption. The development market will need to be reassessed, as well as how the adoption of standards within building regulations has normalised some of these within standard build costs

Evidence	Why required
Energy standards	Current policy refers to BREEAM standard as a proxy for achieving environmental standards within commercial buildings. It has become clear through implementation of the policy that BREEAM is not always applicable / workable dependant on procurement route for development, or general build approach. It will therefore be necessary to determine an alternative route achieving equivalent objectives.
Design guidance	Supplementary Planning Documents already provide guidance for residential and city centre development. There may be other design issues that need to be addressed through similar guidance. Tall buildings within the city centre are an issue. It may be appropriate to determine which views are important to protect and therefore where tall buildings might impact and at what heights.

B. Risk Assessment

Table B.1 Risk assessment

Risk	Impact	Mitigating Actions
Changes to national planning policy or guidance – or planning & environmental legislation.	Additional work or changes to existing work – potential delays to comply with new requirements.	<p>Maintain up to date view of emerging legislation and guidance.</p> <p>Act at the earliest opportunity to respond and influence where possible (e.g. consultations) – but also to communicate impacts to decision makers and manage expectations re the plan making schedule</p> <p>Strong local evidence required to allow deviation from national policy.</p>
Volume of work greater than anticipated – e.g. higher than expected level of comments received at consultation stage -	Potential slippage in programme.	<p>Ensure that timetable is realistic and expect to provide sufficient time for meaningful engagement</p> <p>Procure tools to properly manage representations to ensure they don't become over burdensome to process.</p>
Capacity of Stakeholders to respond as part of engagement activity.	Potential slippage in programme.	Early consultation with stakeholders where appropriate.
Evidence base work takes longer – expands in scope	<p>Potential slippage in programme</p> <p>Additional costs.</p>	<p>Set robust brief when planning / procuring work and ensure adequate resource is allocated.</p> <p>Provide adequate training for specialist issues or buy in expertise.</p>

Risk	Impact	Mitigating Actions
Diversion of resources including staff for other priorities.	Slippage in programme.	Ensure plan making remains a corporate priority. Ensure clear roles established for those whose primary purpose is producing the Local Plan.
Joint working with other internal directorates	Potential for conflict of priorities. Confusion / conflict of objectives.	Need for senior management to be clear of Plan making process and role of Local Plan in the achievement of wider objectives. Educate and manage expectations of what the Plan is able to achieve – the scope and timeframe and ability to absorb the goals and objectives of emerging strategies from different departments.
Joint working with external bodies / other local authorities causes delay	Programme slippage	Engage with outside forums and partnerships to ensure the Council maintains a voice. Statements of Common Ground and Duty to Cooperate.
Lack of in-house skills	Programme slippage. Potential impact on quality & 'soundness' of planning documents.	Ensure adequate and timely training is provided to members of the team for tasks to be undertaken. Be clear what external support is required to achieve objectives
Local Plan timetable too ambitious	Key milestones in programme not met	Ensure LDS is realistic Monitor progress against LDS
Insufficient budgetary provision to finance the project	Work cannot be progressed to programme or has to be paused.	Budget/cost to be kept under review and importance of the Local Plan review to be made clear within business planning.

Risk	Impact	Mitigating Actions
	Objectives on quality compromised	
Planning Inspectorate unable to meet the timescale for examination and report.	<p>Delay to examination / reporting.</p> <p>Key programme milestones not met.</p>	Close liaison with the Planning Inspectorate, to highlight any potential issues/problems at an early stage.
Submitted document fails test of soundness or duty to cooperate	Document cannot be adopted without additional work	<p>Ensure the Development Plan is sound, founded on a robust evidence base with sustainability appraisal and well audited community and stakeholder engagement</p> <p>Maintain joint working arrangements and proactively engage with Local Plans for neighbouring local authorities</p> <p>Consider the need for external health check prior to submission of a document</p>
Legal Challenge	<p>Adopted document quashed</p> <p>Additional workload</p>	<p>Ensure procedures, Act, Regulations, etc. are complied with</p> <p>Close working relationship with Legal Services and external legal support as required</p>

C. Glossary

Authority Monitoring Report – the requirement for a local authority to produce annually an Authority Monitoring Report (AMR) was set out in the Localism Act 2011. The report details the progress on the Local Plan and details of co-operation with neighbouring authorities and prescribed bodies in developing those plans, together with some specific details of housing supply and demand and details of community infrastructure delivery.

Area Action Plans (AAPs) - A type of Development Plan Document focused upon a specific location or an area subject to conservation or significant change (for example major regeneration).

Community Infrastructure Levy (CIL) - A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Development Plan – sets out local authorities’ policies and proposals for the use of land in their area. Planning applications have to be decided in line with the Development Plan, unless there are very good reasons not to do so. The current Development Plan for Hull comprises of the Hull Local Plan and the Kingswood Area Action Plan.

Duty to Cooperate – statutory requirement for the council to cooperate with neighbouring local planning authorities and other prescribed public bodies to ensure strategic and regional planning issues are properly addressed, in the preparation of local plans.

Full Council – meetings of all 57 ward Councillor’s, meets 8 times a year to make decisions on budgets, the policy framework for the city, including Hull City Plan and Development Plan Documents, and the make-up of other committees and outside bodies.

Local Development Scheme (LDS) – sets out timescales and milestones for the production of development plan documents and Supplementary Planning Documents.

Local Plan – the planning document that sets out the authority’s policies and proposals for the development and use of land citywide until 2032. The current local plan was adopted in November 2017 and forms the major part of the development plan for Hull and is used when making decisions on planning applications.

Local Planning Authority – the local authority allowed by law to use statutory town planning functions for a particular geographic area.

Material consideration - A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

National Planning Policy Framework (NPPF) – The National Planning Policy Framework was updated on 19 February 2019 and sets out the government’s planning policies for England and how these are expected to be applied. These policies inform preparation and update of the Local Plan, and decisions on planning applications.

Neighbourhood Plans – introduced by the Localism Act (2011) as a way of helping local communities influence the planning of the area in which they live and work.

The Cabinet – meetings of up to 10 Councillor’s with portfolio duties, who meet to implement Council decisions and review strategies, policies and plans which develop and deliver services to Hull.

Town and Country Planning (Local Plans) (England) Regulations 2012 – sets out the processes of how and when the Local Plan and Supplementary Planning Documents must be prepared, consulted on and adopted.

Statement of Common Ground (SoCG) - A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.

Supplementary Planning Documents (SPDs)– provide more detailed guidance on how policies in the Hull Local Plan are applied. They do not have statutory status, they are not part of the Development Plan and cannot set new policies. However, they are subject to procedures set out in the Statement of Community Involvement and once formally adopted they are ‘material considerations’ in the determination of planning applications.