

Central
Bedfordshire
Council
Priory House
Monks Walk
Chicksands,
Shefford SG17 5TQ



**TO EACH MEMBER OF THE
SUSTAINABLE COMMUNITIES OVERVIEW & SCRUTINY COMMITTEE**

08 September 2011

Dear Councillor

**SUSTAINABLE COMMUNITIES OVERVIEW & SCRUTINY COMMITTEE - Tuesday 13
September 2011**

Further to the Agenda and papers for the above meeting, previously circulated, please find attached the following additional report, which was marked "to follow":-

13. A New Plan-making Programme for Central Bedfordshire

To consider a report on future planning policy documents for Central Bedfordshire.

Should you have any queries regarding the above please contact the Overview and Scrutiny Team on Tel: 0300 300 4634

Yours sincerely

Peter Storey,
Committee Services Officer (Overview & Scrutiny)
email: peter.storey@centralbedfordshire.gov.uk

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Meeting: Sustainable Communities Overview and Scrutiny Committee

Date: 13 September 2011

Subject: A new Plan-making Programme for Central Bedfordshire

Report of: Cllr Ken Matthews, Executive Member for Sustainable Communities - Strategic Planning and Economic Development

Summary: The report sets out the scope and timetable for the production of future development plans for the Central Bedfordshire area, including specific reference to a new "Development Strategy" document and a Gypsy and Traveller Plan. These documents will, as necessary, refresh, update and roll forward the existing planning policy framework in Central Bedfordshire. Members are recommended to endorse the attached programme of work.

Advising Officer: Alan Fleming, Acting Director of Sustainable Communities

Contact Officer: Richard Fox, Head of Development Planning and Housing Strategy

Public/Exempt: Public

Wards Affected: All

Function of: Executive

CORPORATE IMPLICATIONS

Council Priorities:

The Council's priority to manage growth effectively relies on an overarching plan to direct development to the most appropriate areas and to set the principles by which development will be managed. The proposed Development Strategy and other elements of the plan-making programme will therefore be a key part of the Council's approach to new development.

Financial:

As previous experience shows, plan-making is expensive and considerable resources will need to be devoted in order to achieve a sound plan. However, the scale of the Council's investment should be seen in the context of the scale of new investment into Central Bedfordshire that a Development Strategy will enable and the new infrastructure that it can help deliver. It should also be seen against the cost of the alternative approach of fighting public inquiries against inappropriate development. It is also worth noting that the previous plan-making work for Central Bedfordshire will provide an excellent foundation from which to start and will help minimise the extent of new work necessary.

In terms of new budget provision, producing the suggested new plans is likely to cost in the region of £300,000 per year for the next three years. This cost has been

identified as a budget pressure in the Medium Term Financial Plan from 2012/13 onwards for three years. Provision will also be needed to allow for the varying profile of costs throughout the period such as the high start-up costs of beginning evidence creation and the high final cost of the Planning Inspectorate's Public Examination costs.

Legal:

Once adopted the documents included within the plan-making programme will form part of the statutory Development Plan and will be the basis for consideration of planning applications. Until this happens the existing adopted documents will continue to set the planning framework.

Until 31st March 2012, the Joint Planning Committee, (and not Central Bedfordshire Council) is the 'plan-making' authority for the Luton and southern Central Bedfordshire area and it will therefore be necessary to seek the agreement of the Joint Committee to this new programme of plan-making in the south of the Council area.

Risk Management:

The process of producing a Development Strategy and other planning policy documents is long and complex and high quality project management and risk management skills will be required. A project team is being put together to oversee the work.

Staffing (including Trades Unions):

Staff resources to undertake this project are largely in place. Any additional resource required can be accommodated within the existing staff structures and budgets.

Equalities/Human Rights:

The plans listed in the programme of plan-making will be subject to a specific Equalities Impact Assessment in order to comply with the relevant regulatory requirements.

Community Safety:

Planning policy can have an indirect influence on community safety through coordinating appropriate provision of community infrastructure and ensuring that individual development proposals take account of community safety issues.

Sustainability:

The new Development Strategy will have as its underpinning basis the achievement and facilitation of sustainable development. The plans listed in the programme of plan-making will be subject to a specific Sustainability Appraisal/Strategic Environmental Assessment in order to comply with the relevant regulatory requirements.

RECOMMENDATION(S):

The Committee is asked to:-

- 1. Comment on the new Plan-making Programme for Central Bedfordshire**

Introduction

12. The attached report is due to be presented to Executive on 4 October. It relates to a new Plan-making Programme for Central Bedfordshire. This new Programme will be formally known as the Local Development Scheme for Central Bedfordshire but in the interests of transparency and accessibility a new title has been given that more clearly explains the purpose of the document.
13. The new Programme has been prompted, in part, by the intended withdrawal of the joint Core Strategy for Luton and southern Central Bedfordshire, as resolved by the Joint Committee on 29 July 2011. At the time of writing formal confirmation of the withdrawal had not been received from the Secretary of State. Consideration of this report is therefore on the assumption that withdrawal takes place as expected. It is hoped that formal confirmation will have been received by the time Executive consider the issue on 4 October.
14. Members' views on the report and the attached Programme are sought, prior to consideration by Executive.

Appendices:

Appendix A – draft Executive report for 4 October 2011

Appendix B – Plan-making Programme for Central Bedfordshire

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Meeting: Executive

Date: 4 October 2011

Subject: A new Plan-making Programme for Central Bedfordshire

Report of: Cllr Ken Matthews, Executive Member for Sustainable Communities - Strategic Planning and Economic Development

Summary: The report sets out the scope and timetable for the production of future development plans for the Central Bedfordshire area, including specific reference to a new "Development Strategy" document and a Gypsy and Traveller Plan. These documents will, as necessary, refresh, update and roll forward the existing planning policy framework in Central Bedfordshire. Members are recommended to endorse the attached programme of work.

Advising Officer: Alan Fleming, Acting Director of Sustainable Communities

Contact Officer: Trevor Saunders, Assistant Director Planning

Public/Exempt: Public

Wards Affected: All

Function of: Executive

Key Decision Yes

Reason for urgency/ exemption from call-in (if appropriate) N/A

CORPORATE IMPLICATIONS
<p>Council Priorities:</p> <p>The Council's priority to manage growth effectively relies on an overarching plan to direct development to the most appropriate areas and to set the principles by which development will be managed. The proposed Development Strategy and other elements of the plan-making programme will therefore be a key part of the Council's approach to new development.</p> <p>Financial:</p> <p>As previous experience shows, plan-making is expensive and considerable resources will need to be devoted in order to achieve a sound plan. However, the scale of the Council's investment should be seen in the context of the scale of new investment into Central Bedfordshire that a Development Strategy will enable and the new infrastructure that it can help deliver. It should also be seen against the cost of the alternative approach of fighting public inquiries against inappropriate development. It is also worth noting that the previous plan-making work for Central Bedfordshire will provide an excellent foundation from which to start and will help minimise the extent of new work necessary.</p>

In terms of new budget provision, producing the suggested new plans is likely to cost in the region of £300,000 per year for the next three years. This cost has been identified as a budget pressure in the Medium Term Financial Plan from 2012/13 onwards for three years. Provision will also be needed to allow for the varying profile of costs throughout the period such as the high start-up costs of beginning evidence creation and the high final cost of the Planning Inspectorate's Public Examination costs.

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Risk Management:

The process of producing a Development Strategy and other planning policy documents is long and complex and high quality project management and risk management skills will be required. A project team is being put together to oversee the work.

Staffing (including Trades Unions):

Staff resources to undertake this project are largely in place. Any resource required can be accommodated within the existing staff structures and budgets.

Equalities/Human Rights:

The plans listed in the programme of plan-making will be subject to a specific Equalities Impact Assessment in order to comply with the relevant regulatory requirements.

Community Safety:

Planning policy can have an indirect influence on community safety through coordinating appropriate provision of community infrastructure and ensuring that individual development proposals take account of community safety issues.

Sustainability:

The new Development Strategy will have as its underlying basis the achievement and delivery of sustainable development. The plans listed in the programme of plan-making will be subject to a specific Sustainability Appraisal/Strategic Environmental Assessment in order to comply with the relevant regulatory requirements.

Summary of Overview and Scrutiny Comments:

- To follow after the Sustainable Communities Overview and Scrutiny Committee meeting on 13 September 2011.

RECOMMENDATION(S):

1. that the Executive support the preparation of the following plans:
 - Development Strategy
 - Gypsy and Traveller Plan
 - Site Allocations Plan and/or Neighbourhood Plans as appropriate

2. that the Executive note the attached programme of plan-making, which will formally represent the Local Development Scheme for Central Bedfordshire;

3. that, in respect of the northern part of Central Bedfordshire:
 - a) the Executive agree the programme of plan-making for formal submission to the Secretary of State and, following approval, bring the programme into effect;
 - b) the Director of Sustainable Communities in consultation with the Executive Member for Sustainable Communities - Strategic Planning and Economic Development, be authorised to make any minor changes to the programme of plan-making, both prior to formal submission and in response to any comments made by the Secretary of State.

4. that, in respect of the southern part of Central Bedfordshire, the Executive recommend to the Luton and South Bedfordshire Joint Committee that it agrees the programme of plan-making for formal submission to the Secretary of State and, following approval, bring the programme into effect.

Reason for Recommendation(s): To set the scope and timetable for future plan-making in Central Bedfordshire.

Executive Summary

The report sets out the scope and timetable for future plan-making activity in the Central Bedfordshire area, including specific reference to a new "Development Strategy" document and a Gypsy and Traveller Plan. These documents will, as necessary, refresh, update and roll forward the existing planning policy framework in Central Bedfordshire. Members are recommended to endorse the attached programme of work.

Background

1. In terms of planning policy there is currently a difference in approach between the northern and southern parts of Central Bedfordshire, derived from the arrangements of the legacy authorities. In the northern part of Central Bedfordshire there are adopted Core Strategy and Development Management Policies, Site Allocations Development Plan Documents (DPDs) and an emerging Gypsy and Traveller DPD which together provide a comprehensive development plan for that part of Central Bedfordshire.

2. In the southern part of Central Bedfordshire, formal responsibility for planning policy-making currently lies with the Luton and South Beds Joint Planning Committee. The Joint Committee resolved on 29 July to write to the Secretary of State requesting a withdrawal of the submitted Joint Core Strategy. The reports to Central Beds Executive on 12 July and 23 August 2011 provide more background on this issue. Providing a new approach to planning policy documents would have been necessary from 1 April 2012 in any event. However, the recent decision by the Joint Committee has created an increased impetus to proceed with single development plan coverage for the whole of Central Bedfordshire.

A changing national policy context

3. The Government has recently published a draft National Planning Policy Framework (NPPF), a document which seeks to radically condense the current suite of planning policy statements, guidance and circulars into a single streamlined document. It is intended to reflect the Government's top priority to promote sustainable economic growth and jobs and to increase the overall supply of housing. The Framework introduces a strong presumption in favour of sustainable development which will prevail where development plans are not up-to-date. The final NPPF is expected to be in place before the end of the year.
4. The Localism Bill, due to be enacted later this year, introduces a series of planning reforms including the abolition of Regional Strategies, new neighbourhood plans, the community right to build and some changes to the Community Infrastructure Levy.
5. An important element of the Localism Bill is the "duty to cooperate". The duty extends to local authorities and other service providers and is intended to ensure a joined-up approach to plan-making across administrative boundaries. In large part, the new duty is a response to the void left by the abolition of the regional and sub-regional tiers of the planning system, but it is also a recognition that key planning issues require a response that sometimes transcend administrative boundaries. The duty is likely to require a high-level of cooperation on evidence gathering and plan-making between bodies on an ongoing basis through preparation of the plan.
6. This duty will also be important to Central Bedfordshire because of the geography of the area. Large settlements and their centres of commercial activity lie outside of Central Bedfordshire but exert a strong influence on it. Any plan for Central Bedfordshire needs to recognise the influence of surrounding areas and the realities of the employment and housing markets. Close co-operation on issues such as employment land, retail, housing provision and transport infrastructure will therefore be important.
7. Informal discussions have already taken place with many of the relevant parties. More formal arrangements, including Member discussions, will need to be put in place with the surrounding authorities, notably Bedford Borough Council, Milton Keynes Council and Luton Borough Council, building on existing or providing new joint working arrangements.

A new approach for Central Bedfordshire

8. In order to create a single planning framework for Central Bedfordshire the attached programme of work suggests a collection of new planning documents for the whole of the area should be produced by the Council covering the period to 2031. The attached document will constitute the Local Development Scheme (LDS) for Central Bedfordshire in terms of the regulatory requirements.
9. It is important that the new documents cover the whole of the Central Bedfordshire area. The previous arrangement, whereby Central Bedfordshire was split in two for plan-making purposes, was appropriate as an interim measure while the Joint Committee continued with the joint plan for growth in Luton and southern Central Bedfordshire. However, with plan-making responsibilities returning to Central Bedfordshire Council it is important and appropriate that the area is treated as a whole.
10. The main planning document proposed is a new "Development Strategy" document which will set out the overarching spatial strategy and development principles for the area together with more detailed policies to help determine planning applications.
11. The Development Strategy will address largely similar issues to those in the Core Strategy and Development Management Policies in the north, but will also consider the allocation of strategic development sites in the south. The main elements of the Development Strategy will be:
 - the strategic objectives for the area;
 - an overarching strategy for the location of new development;
 - the scale of new employment, housing and retail provision;
 - the identification of new strategic scale development sites;
 - the extent of new infrastructure required (linked to the proposed Community Infrastructure Levy (CIL));
 - the key areas within Central Bedfordshire where development will not be appropriate and where green infrastructure and biodiversity interests will take priority; and
 - a set of detailed policies to guide the consideration of new development proposals.
12. The indicative timetable shown on the attached programme shows consultation on a draft plan around next May with formal adoption in early 2014.
13. During this process it will be important not to undermine or diminish the important planning policy work already undertaken for the area, which will remain in place until it is formally replaced. However there will be an opportunity to refresh this work in light of the new circumstances, the new plan area and the aspirations for Central Bedfordshire.
14. For the northern part of Central Bedfordshire the new Development Strategy document will refresh and roll forward the existing adopted planning policy framework.
15. For the southern part of Central Bedfordshire, the Development Strategy will

replace the adopted Local Plan (adopted in 2004) and can utilise the existing evidence produced as part of work on the joint Core Strategy prepared by the Joint Committee. Until a new Development Strategy is adopted however, the Local Plan and joint Core Strategy, which was recently endorsed for Development Management purposes, will continue to set the planning context for decisions on planning applications.

16. In order to set out the opportunities for public involvement in the Development Strategy and other plans the Statement of Community Involvement (SCI) will also need to be updated and applied to the whole of Central Bedfordshire. This document is currently being updated and will be published for consultation in due course. Member scrutiny will take place through the Sustainable Communities Overview and Scrutiny Committee and/or the Development Strategy Task Force.

Non-strategic elements of the programme

17. Aside from the Development Strategy there is a need to address other more detailed aspects of planning policy. Provision for the Gypsy and Traveller and Travelling Showpeople communities is also an issue that might usefully be separated out from other aspects of the programme. Local authorities are required to assess the accommodation needs of Gypsies and Travellers alongside the settled population and to develop a strategy that addresses any identified unmet need.
18. Recent Government guidance re-emphasises the importance of delivering Gypsy and Traveller pitches in line with local need and has sought to mainstream provision alongside other community requirements. The Development Strategy document will therefore need to set the context for future Gypsy and Traveller and Travelling Showpeople provision. However, the consideration of detailed sites is something that can more appropriately be dealt with through a planning document dedicated to this issue.
19. Significant work on the identification of Gypsy and Traveller sites has already been undertaken in the north of Central Bedfordshire and rather than discard these advances in the provision of sites it is proposed that this work is banked and helps to underpin the new document for the whole of Central Bedfordshire Council. To further provide assurance in the north of Central Bedfordshire it may be appropriate to endorse the work undertaken to date on the preparation of the Development Plan Document for development management purposes until such time as the new district wide document is in place. Members are therefore asked to support the preparation of a Central Bedfordshire-wide Gypsy and Traveller plan to deliver the combined pitch requirement for the northern and southern parts of Central Bedfordshire to 2031.
20. In terms of the allocation of other non-strategic sites, the previous approach was to produce a separate Site Allocations plan that looked to identify suitable non-strategic sites for housing, employment and other uses. In the north the Site Allocations DPD was adopted in April 2011 and progress towards a similar document in the south was in its early stages.
21. However, changes to the Localism Bill and the National Planning Policy Framework (NPPF) mean that an alternative approach might need to be considered where a Site Allocations document was not produced. Instead, the

alternative could be to enable a more “localist” approach to be considered whereby individual parishes or neighbourhoods bring forward potential development sites through neighbourhood plans, in accordance with the Development Strategy. Guidance would be provided for neighbourhoods through the new Development Strategy document while the actual allocation is dealt with at the local level in new Neighbourhood Plans. Officers are still exploring this option and it will need further consideration once the Localism Bill is enacted and the NPPF agreed. At this stage, a separate Site Allocations plan is not included in the plan-making programme but one could be added at a later stage should it be required.

Plan-making responsibility

22. Up to 31st March 2012, the Luton and South Bedfordshire Joint Committee remains the Local Planning Authority for plan-making purposes in southern Central Bedfordshire. This programme of planning policy work will therefore need to be considered and agreed by the Joint Committee or its Sub-Committee. It is therefore recommended that Members agree the programme of work insofar as it relates to the northern part of Central Bedfordshire and recommend to the Joint Committee, or its Sub-Committee, that it does the same for the southern part.

Conclusions

23. Members are recommended to endorse the attached programme of plan-making for Central Bedfordshire, including a Development Strategy document and a Gypsy and Traveller plan.
24. The programme of plan-making must be submitted to the Government (DCLG). It will come into effect four weeks after submission unless the Secretary of State intervenes or asks for more time. When it takes effect the Council is required to make copies available at the Council offices and publish it on the website.
25. Members should note the potential for significant changes to emerge through the Localism Bill and the new regulations that will support the Bill, as well as the new NPPF. It might be that the attached programme needs further reflection early next year when the implications of these changes for plan-making become clear. However, on the basis of the current situation Members are recommended to endorse the attached programme.

Appendices

Central Bedfordshire Plan-making Programme

Background Papers: (open to public inspection)

North Central Bedfordshire Core Strategy and Development Management Policies DPD

North Central Bedfordshire Site Allocations DPD

Luton and southern Central Bedfordshire Core Strategy (Pre-Submission version, November 2010)

Location of papers: www.centralbedfordshire.gov.uk/environment-and-planning/planning/ldf

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A plan-making programme for Central Bedfordshire

September 2011

(Local Development Scheme for Central
Bedfordshire)

1.0 Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 requires each local planning authority to produce a Local Development Scheme (LDS), which is essentially a work programme for the preparation of new planning policy documents. This plan-making Programme represents the LDS for Central Bedfordshire.
- 1.2 This document covers the whole administrative area of Central Bedfordshire. It is the starting point for the community and other stakeholders in order to find out which planning policy documents the Council intends to produce, and the timescale for their preparation.

2.0 About the area

- 2.1 Central Bedfordshire comprises the former administrative areas of Mid Bedfordshire and South Bedfordshire Districts. It is a varied area containing a mixture of rural countryside, attractive villages, and small to medium sized towns. It is well connected, being traversed by the M1, A1, A5 and A6 as well as the East Coast Mainline, West Coast Mainline and the Midland Mainline. London Luton Airport is also in close proximity.
- 2.2 Much of the rural area is of high landscape and biodiversity value with extensive tracts of high-grade agricultural land. The Chilterns Area of Outstanding Natural Beauty covers a substantial part of the area while some land outside of the main towns and villages is designated as Green Belt.

3.0 Policy Framework and the requirement for a new Plan-making Programme

- 3.1 Following the formation of Central Bedfordshire Council as a unitary authority in April 2009, two separate Local Development Frameworks were progressed; one covering the area formerly administered by Mid Beds District Council and one covering Luton and the area formerly administered by South Beds District Council.
- 3.2 The withdrawal of the draft joint Luton and South Bedfordshire Core Strategy, and the publication of the draft Localism Bill and draft National Planning Policy Framework, means that the opportunity has arisen to consolidate the two separate frameworks into one. In the interim, the Development Plan for the former Mid Beds area will consist of the Regional Strategy, and the existing adopted Core Strategy and Development Management Policies DPD and Site Allocations DPD. For the former South Beds area, it will consist of the Regional Strategy and saved Structure Plan and Local Plan policies.

3.3 The decision to prepare a new plan for Central Bedfordshire means that a new LDS is required.

4.0 Proposed Development Plan Documents

4.1 This Programme focuses solely on the preparation of two Development Plan Documents (DPDs): the Central Bedfordshire Development Strategy and the Gypsy and Traveller Plan. The Council will also need to plan for the allocation of non-strategic scale sites, either through the preparation of Neighbourhood Plans or a Site Allocations plan. A decision regarding this issue will be made once the Localism Bill has been enacted and the National Planning Policy Framework agreed. Once a decision has been reached, a revision to this document may be required.

4.2 Following the Planning Act 2008, it is no longer necessary to include details of proposed Supplementary Planning Documents and other Local Development Documents within an LDS. Policies and designations will be illustrated on the Proposals Map which will be updated following adoption of each document.

Table 1: Central Bedfordshire Development Strategy

Central Bedfordshire Development Strategy	
Role and content	To set out the vision, strategic objectives and spatial strategy for the area up to 2031 and the policies for achieving the strategic vision. This will entail an assessment of general development needs together with the consideration of any necessary Green Belt reviews. The identification of strategic-scale development sites will also be considered.
Status	Development Plan Document
Chain of conformity	General conformity with regional and national planning guidance
Geographic coverage	The entire administrative area of Central Bedfordshire
Projected timetable and milestones	
Commencement (including SA Scoping Report)	September 2011
Evidence Gathering	October 2011 – April 2012
Consultation	May – June 2012
Consideration of consultation responses and produce revised Plan	July – November 2012
Publication stage	December 2012 – February 2013
Submission to Secretary of State	May 2013
Examination Hearings	September 2013
Receipt of Draft Inspector’s Report	December 2013

Adoption	February 2014
Arrangements for production	
Management arrangements	Decisions will be taken by Central Bedfordshire Council's Executive. Day to day management of process by Head of Development Planning and Housing Strategy.
Resources required	Officers from the Development Planning team with input as necessary from other teams and departments. Consultants may be used for specific aspects of the work.
Stakeholder and Community Involvement	The Statement of Community Involvement sets out the standard mechanisms for community involvement. This DPD will be prepared in light of the views of the community and other stakeholders
Monitoring and review mechanisms	Monitored on an annual basis as part of the Annual Monitoring Report.

Table 2: Gypsy and Traveller Plan

Gypsy and Traveller Plan	
Role and content	To identify the Council's approach to the provision of additional Gypsy and Traveller pitches and sites, including the allocation of new sites if required.
Status	Development Plan Document
Chain of conformity	Conformity with the Central Bedfordshire Development Strategy and general conformity with regional and national planning guidance
Geographic coverage	The entire administrative area of Central Bedfordshire
Projected timetable and milestones	
Commencement (including SA Scoping Report)	January 2012
Evidence Gathering	February – September 2012
Consultation	October - November 2012
Consideration of consultation responses and produce revised Plan	December 2012 – April 2013
Publication stage (Regulation 27)	May – June 2013
Submission to Secretary of State	September 2013
Examination Hearings	January 2014
Receipt of Draft Inspector's Report	April 2014
Adoption	June 2014
Arrangements for production	
Management arrangements	Decisions will be taken by CBC Executive. Day to day management of process by Head of Development Planning and Housing Strategy.

Resources required	Officers from the Development Planning team with input as necessary from other teams and departments. Consultants may be used for specific aspects of the work.
Stakeholder and Community Involvement	The Statement of Community Involvement sets out the standard mechanisms for community involvement. This DPD will be prepared in light of the views of the community and other stakeholders
Monitoring and review mechanisms	Monitored on an annual basis as part of the Annual Monitoring Report.

- 4.3 In order to inform the preparation of policy documents, the Council has undertaken a large number of background technical studies. These will be refreshed and updated periodically as necessary. In preparing these policy documents, the Council will have regard to a number of different strategies. These include the Sustainable Community Strategy (SCS) and others covering topic areas such as education, health, social inclusion, waste, biodiversity, recycling and environmental protection, local housing strategies and transport plans.
- 4.4 The Council will seek to work closely with neighbouring authorities on the preparation of policy documents. Technical studies maybe undertaken jointly where this is deemed to be appropriate.

5.0 Project Management

- 5.1 In order to ensure that the preparation of the Core Strategy is undertaken in a focussed and coherent manner, a project management approach is being taken to the coordination of the work. To this end a Plan-making Programme Project Management Gantt Chart has been drawn up. This is set out in Figure 1.
- 5.2 The Gantt Chart identifies how the documents will be prepared and when key milestones are expected to be met.
- 5.3 The project management approach, using the Project Management Gantt Chart, will enable the undertaking of clear and accurate monitoring which will inform the Annual Monitoring Report (AMR). This process will feed into the regular review of the Plan-making Programme and ensure that it continues to be relevant and up-to-date.

Figure 1: Timeline for plan preparation

	2011				2012												2013												2014																																
Month	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	J	F	M	A	M	J	J	A	S	O	N																						
Central Bedfordshire Development Strategy	Commencement	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27											
Gypsy and Traveller Plan				Commencement	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Evidence Gathering	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 25	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27	Reg 27

Development Plan Documents

- Commencement
- Evidence Gathering
- Formal Consultation (Reg 25)
- Consideration of consultation responses
- Publication stage (Reg 27)
- Submission
- Examination
- Inspectors Report
- Adoption

Commencement	Red
Evidence Gathering	Orange
Formal Consultation (Reg 25)	Blue
Consideration of consultation responses	Yellow
Publication stage (Reg 27)	Pink
Submission	Grey
Examination	Cyan
Inspectors Report	Green
Adoption	Purple

6.0 Risk Assessment

6.1 An analysis has been completed of the principal tasks associated with undertaking the preparation of planning policy documents. These risks, listed in Table 5 below, have been taken into consideration in devising this Programme and will be closely monitored.

Table 4: Key risks and mitigation measures

Key Risks/Owner	Action to Mitigate Risk and Comments	Risk Level
Challenging time-scales for preparing policy documents	<ol style="list-style-type: none"> Careful project management and regular review If necessary, adjustment of Programme through annual review. Prioritisation of other work <p>Uncertainty factors remain – e.g. the level of representations submitted on documents, time taken in Public Examination and reporting time, or if new issues arise requiring other documents to be prepared or the diversion of staff. Other factors identified in this assessment may also lead to delay to the timescales. There is no real slack in the timetable.</p>	Medium
Changing national policy context requiring reassessment of content of documents	<ol style="list-style-type: none"> Continual monitoring of planning policy climate Prompt action to align local policy 	High
Premature planning applications for sites resulting in staff being redeployed to deal with time-consuming appeals	<ol style="list-style-type: none"> Regular monitoring and review of progress with a view to delivery on schedule If necessary, allocate relevant officer(s) and/or appeals consultants. 	High
Too few staff, staff turnover, level of experience of staff and strong reliance on consultants	<ol style="list-style-type: none"> Scope for flexible use of staff from other teams <p>Budget contingency fund</p>	Medium
Previously developed sites not being	Continue to exert pressure on government, Highways Agency and other bodies to ensure that essential infrastructure is in place and other	High

redeveloped because of lack of investment in essential infrastructure	blockages to development are removed to facilitate delivery . Current market downturn affects all development in the short term.	
Financial resources	Regular budget monitoring.	Medium
Capacity of Planning Inspectorate (PINS) and other agencies to support the preparation of documents	Provide early warning to PINS and other agencies of timescales and requirements and develop good relationships with agencies through consultation.	Medium
Ensuring 'Soundness' of documents	Through preparing a good evidence base, good dialogue with the community/stakeholders in line with the SCI, regular liaison with Counsel and CLG.	Low
Legal Challenge	Through ensuring preparation of 'sound' documents.	Low

6.2 Plan-making bodies must prepare an Annual Monitoring Report (AMR) to assess their implementation of the plan-making, and the extent to which plan policies are being achieved. Such review will assess progress against targets and milestones in the Programme, with appropriate action being taken in the light of findings.

6.3 Changes to the Plan-making Programme will be reported in the AMR with complete revisions to the Programme only made where necessary.

7.0 Glossary

Development Plan: the Regional Spatial Strategy and the Development Plan Documents contained within a Local Development Framework constitute the statutory development plan.

Local Development Framework (LDF): a portfolio of Local Development Documents – it consists of Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement, the Local Development Scheme and Annual Monitoring Reports

Local Development Document (LDD): the collective term for Development Plan Documents, Supplementary Planning Documents and the Statement of Community Involvement.

Development Plan Documents (DPD): a name given to a range of policy plans that are subject to independent examination, and are shown geographically on an adopted Proposals Map (discussed below).

Site Allocations: allocations of sites for specific or mixed uses or developments to be contained in Development Plan Documents. Policies will identify any specific requirements for individual proposals.

Development Management Policies: these constitute a suite of criteria-based policies, which are required to ensure that all development within an area meets the spatial vision and objectives set out in the Core Strategy. They may be included in any Development Plan Document or form a standalone document.

Proposals Map: the adopted proposals map illustrates on a base map at a registered scale all the policies contained in Development Plan Documents, together with any saved policies. It must be revised as each new Development Plan Document is adopted, and it should always reflect the up-to-date planning strategy for the area. Proposals for changes to the adopted proposals map accompany submitted development plan documents in the form of a submission proposals map.

Supplementary Planning Documents (SPD): provide supplementary information in respect of the policies in Development Plan Documents or a saved policy. They do not form part of the Development Plan and are not subject to independent examination.

Annual Monitoring Report (AMR): A public report to be produced by local authorities to assess their progress on implementation of the LDS and the effectiveness of the LDDs in terms of policy achievement.

Sustainability Appraisal (SA): a tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and

economic factors) and required in the Act to be undertaken for all Local Development Documents (except the Statement of Community Involvement). This process incorporates the requirements of the Strategic Environmental Assessment Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

Examination: a local planning authority must submit a Development Plan Document for independent examination to the Secretary of State, publish a notice and invite representations, to be made within a specified period of at least six weeks.