



Sedgefield Borough Council
Local Development Scheme 2006

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Foreword

Over the last year, the Borough Council has adopted its Statement of Community Involvement and Residential Extensions Supplementary Planning Document. We have also undertaken our Strategic Flood Risk Assessment and will shortly complete the Open Space Needs Assessment. This evidence base will continue to be developed further over the coming year.

This revised Local Development Scheme takes forward the work already undertaken by the Borough Council in developing its Local Development Framework and provides the community with a clear picture of the work that the Local Planning Authority will undertake over the next three years to further develop the Borough Local Development Framework.

Councillor David Newell
Planning & Development Portfolio Holder

Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 will result in major changes to the way the forward planning system operates. The existing statutory development plan will be replaced, consisting of the Regional Spatial Strategy (RSS) and the Borough Local Development Framework (LDF). The Regional Planning Body will prepare the RSS and it will eventually replace the existing Regional Planning Guidance for the North East and the County Durham Structure Plan.
- 1.2 Under the new Planning Act, the Local Planning Authority has a duty to prepare a series of documents that will form the Borough LDF. This folder of documents can consist of:
- Local Development Documents¹ (LDDs);
 - A Statement of Community Involvement (SCI);
 - A Local Development Scheme (LDS); and,
 - Annual Monitoring Reports (AMRs).
- The relationship between these different documents and their definitions of these terms are included in Appendix 1 and the Glossary respectively.
- 1.3 The LDS will inform people how the Council will develop the LDF over the next three years. The LDS serves two distinct purposes:
- i. it provides the starting point for the local community to find out what the Council's planning policies are for the area in which they live, as it will set out the current documents which form the development plan for planning of the area; and,
 - ii. it sets out the programme for the preparation of LDDs over the three-year period, including timetables that will tell people when the various stages in the preparation of any particular LDD will be carried out.
- 1.4 Although the LDS will not be subject to public comment or independent examination, the Planning Inspectorate (PINS) will be consulted on the draft LDS and it will be submitted to the Government Office for the North East for scrutiny and approval before the Council can adopt it. The LDS will be monitored on a yearly basis via the AMR and will be reviewed where:
- there have been unforeseen delays to the production of LDDs;
 - there is a need to revise a LDD; or
 - there is a need to prepare a new LDD.
- 1.5 The published version of the LDS will be publicly available for inspection at the Borough Council Offices during normal office hours and via the Council's website www.sedgefield.gov.uk.

¹ LDDs can consist of Development Plan Documents (DPDs), which are subject to independent examination and have the weight of development plan status, and Supplementary Planning Documents (SPDs), which are not subject to independent examination and do not have development plan status.

Local Development Framework Progress

- 2.1 Since the publication of the last Local Development Scheme in April 2005, the Borough Council has made progress in the delivery of its Local Development Framework. In February 2006, the Council adopted the Residential Extensions Supplementary Planning Document and in June 2006, the Council adopted the Statement of Community Involvement.

Proposed Profiles of Local Development Documents

- 3.1 The key element of the LDS is to set out the number of LDDs to be prepared over the three-year period and the programme for preparing such documents. Whilst this LDS proposes to develop a number of LDDs over the next three years, it is inevitable that the development of some documents will be prioritised before others. The key documents that will be prioritised are the Core Strategy DPD, Major Allocations DPD, and the Affordable Housing Supplementary Planning Document.

Core Strategy DPD

- 3.2 The development and delivery of the Core Strategy DPD is the priority for the Borough Council. The Core Strategy will provide the strategic planning framework for the Borough and it is essential that this DPD be developed as soon as practicable. In the intervening period, the emerging Regional Spatial Strategy will provide this strategic framework.
- 3.3 The programme for producing the Core Strategy has allowed sufficient time to conform to the Strategic Environment Assessment Directive and to incorporate Sustainability Appraisal in the process (Appendix 4).

Major Allocations DPD

- 3.4 The Major Allocations DPD will provide new housing and employment allocations. The existing housing allocations in the Borough Local Plan have largely been developed and there will be a continuing requirement to provide land to meet the community's housing needs. Similarly, there is a need to review the employment allocations. In the last version of the LDS, the Core Strategy and Major Allocations DPD's were programmed to be developed together. However, after consideration of new advice from the Government Office and the Planning Inspectorate, it has been agreed that the preparation of these documents are separated and staggered.
- 3.5 The programme for producing the Major Allocations DPD has allowed sufficient time to conform to the Strategic Environment Assessment Directive and to incorporate Sustainability Appraisal in the process (Appendix 4).

Affordable Housing SPD

- 3.6 The Annual Monitoring Report 2004/5 highlighted the need to provide affordable housing as an emerging issue. Since the production of the AMR, property prices in the Borough have continued to rise and this is exacerbating the need for affordable housing. The Borough Council has been working with the University of Newcastle to understand what would require to be covered by such a SPD and the Council's Overview and Scrutiny Committee 2 are currently undertaking a review this summer. The preparation of the Affordable Housing SPD will follow on from the recommendations of the Overview and Scrutiny Committee.

- 3.7 The programme for producing the Affordable Housing SPD has allowed sufficient time to conform to the Strategic Environment Assessment Directive and to incorporate Sustainability Appraisal in the process (Appendix 4).

Other LDDs to be given some priority

- 3.8 In addition, the Development Control Policies DPD will be given some priority.
- 3.9 However, if there are unforeseen circumstances that result in a timetable delay, the timetable for the Development Control Policies DPD will be revised accordingly. Given these vagaries in the timetable, the Council does not wish to indicate how the Development Control Policies DPD examination will be run. Any changes to the initial timetable will be identified through the Annual Monitoring Report.

Saving existing Local Plan policies

- 3.10 In the transitional period between the Local Plan and the LDF forming the statutory development plan; the Council has an opportunity to “save” policies, proposals and Supplementary Planning Guidance from the adopted Local Plan. These “saved” policies will remain in place until such time that the new LDDs are adopted. PPS 12 identifies that in broad terms, the Borough Council needs to demonstrate to the Secretary of State that these “saved” policies are compliant with the following criteria:
- there is a clear central strategy;
 - it has regard to the Community Strategy;
 - it is in conformity with the Regional Spatial Strategy;
 - it is in conformity with the Core Strategy (where adopted);
 - it is an effective policy in an area where there is significant change envisaged; and
 - it is necessary and does not repeat national or regional policy.
- 3.11 Detailed guidance from the Government is expected soon to identify how Local Authorities undertake this assessment. Once this has been published, the Borough Council will undertake this assessment to properly “save” its relevant Local Plan Policies.
- 3.12 The following schedules provides a list of LDD to be prepared by the Council over the next three years and gives a description of their content, chain of conformity, geographic coverage, status, timetable to adoption, management and monitoring arrangements. The LDS also includes a detailed Gantt chart showing the detailed programme of work and overall project management.

Core Strategy DPD	
Overview	
Role & Subject	Strategic document setting out the vision, spatial strategy and core policies for meeting known and anticipated development requirements to 2016. The document will include a key diagram to show broad locations of proposed new development, key transport nodes, movement pattern and the relationship with other local authorities. The DPD will be expressed cartographically through the Proposals Map.
Coverage	Borough-wide.
Status	Development Plan Document
Conformity	With national PPSs, the RSS and the Borough Council's Community Strategy.
Timetable	
Milestones	Dates
Informal consultation and evidence gathering (leading to Options consultation)	August - September 2006
Preferred Options Consultation	March – April 2007
Submission of DPD to Secretary of State and DPD Consultation	March 2008
Pre-examination meeting	July 2008
Examination	October 2008
Estimated Date For Adoption	June 2009
Arrangements for Production	
Project Manager	Forward Planning Manager
Management Requirements	LDF Advisory Group and the Borough's Cabinet
Evidence Required	Urban Capacity Study, Housing Needs Survey, Employment Land Survey, Open Space Needs Assessment, Town Centre Surveys, etc.
Resources Required	Forward Planning Team, input from other Officers e.g. Development Control Team and administrative support. Consultants will be required to produce the Employment Land Survey and Housing Needs Survey. It is likely that other documents will be produced by other sections of the Council or be prepared in-house
Community and Stakeholder Involvement	Informal and formal consultations with specific groups will take place throughout the production of the DPD, in accordance with the advice set out in the Borough SCI.
Monitoring	
The Core Strategy DPD will be monitored through the AMR and subject to review if this highlights a need. Otherwise, the document will be formally reviewed at least once every three years.	

Major Allocations DPD	
Overview	
Role & Subject	The Major Allocations DPD sets out the location of new major housing and employment development for the plan period. The DPD will be expressed cartographically through the Proposals Map.
Coverage	Borough-wide.
Status	Development Plan Document
Conformity	In general conformity with national PPSs, the RSS and the Core Strategy DPD.
Timetable	
Milestones	Dates
Informal consultation and evidence gathering (leading to release of Issues and Options Paper)	June – July 2007
Preferred Options Consultation	June – July 2008
Submission of DPD to Secretary of State and DPD Consultation	July 2009
Pre-examination meeting	November 2009
Examination	February 2010
Estimated Date For Adoption	September 2010
Arrangements for Production	
Project Manager	Forward Planning Manager
Management Requirements	LDF Advisory Group and the Borough's Cabinet
Evidence Required	Urban Capacity Study, Housing Needs Survey, RSS housing apportionment, Employment Land Surveys
Resources Required	Forward Planning Team, input from other Officers e.g. Development Control Team and administrative support. Consultants will be required to produce the Housing Needs Survey.
Community and Stakeholder Involvement	Informal and formal consultations with specific groups will take place throughout the production of the DPD, in accordance with the advice set out in the Borough SCI.
Monitoring	
The Major Allocations DPD will be monitored through the AMR and subject to review if this highlights a need. Otherwise, the document will be formally reviewed at least once every three years.	

Affordable Housing SPD	
Overview	
Role & Subject	The Affordable Housing SPD sets out detailed guidance for developers to the issues concerning the provision of affordable housing.
Coverage	Borough-wide.
Status	Supplementary Planning Document
Conformity	In general conformity with national PPSs, the RSS and the Core Strategy DPD.
Timetable	
Milestones	Dates
Evidence gathering and pre-production	September 2006 – April 2007
Consultation on draft SPD	May – June 2007
Consideration of Representations and finalise SPD	July – August 2007
Estimated Date For Adoption	September 2007
Arrangements for Production	
Project Manager	Forward Planning Manager
Management Requirements	LDF Advisory Group and the Borough's Cabinet
Evidence Required	University of Newcastle Consultancy Project, Overview and Scrutiny Review Group Report, Housing Needs Study
Resources Required	Forward Planning Team, input from other Officers e.g. Development Control Team, Housing Strategy and administrative support.
Community and Stakeholder Involvement	Informal and formal consultations with specific groups will take place throughout the production of the SPD, in accordance with the advice set out in the Borough SCI.
Monitoring	
The Affordable Housing SPD will be monitored through the AMR and subject to review if this highlights a need.	

Development Control Policies DPD	
Overview	
Role & Subject	The Development Control Policies DPD sets out the land use development control policies for the LDF period. The DPD will be expressed cartographically through the Proposals Map.
Coverage	Borough-wide.
Status	Development Plan Document
Conformity	In general conformity with national PPSs, the RSS and the Core Strategy DPD.
Timetable	
Milestones	Dates
Informal consultation and evidence gathering (leading to release of Issues and Options Paper)	March – April 2008
Preferred Options Consultation	March – April 2009
Submission of DPD to Secretary of State and DPD Consultation	December 2009
Pre-examination meeting	April 2010
Examination	July 2010
Estimated Date For Adoption	March 2011
Arrangements for Production	
Project Manager	Forward Planning Manager
Management Requirements	LDF Advisory Group and the Borough's Cabinet
Evidence Required	None
Resources Required	Forward Planning Team, input from other Officers e.g. Development Control Team and administrative support.
Community and Stakeholder Involvement	Informal and formal consultations with specific groups will take place throughout the production of the DPD, in accordance with the advice set out in the Borough SCI.
Monitoring	
The Development Control Policies DPD will be monitored through the AMR and subject to review if this highlights a need. Otherwise, the document will be formally reviewed at least once every three years.	

Further work proposed but as yet timetable not planned

3.13 The biggest factor concerning the volume of documents to be prepared is the level of staff resources, and in particular regarding the shared Sustainability Appraisal Officers. Given the programmed workload of the Sustainability Appraisal Officers, the preparation of other documents will have to wait. When resources allow, the following documents will be prepared. Planning Obligations SPD will not come forward for at least 18 months. Therefore, no specific timetable has been included within this LDS but nevertheless is an issue that will need to be addressed.

- Planning Obligations SPD;
- Open Space and Recreation SPD;
- Conservation Areas SPD;
- Environment Protection and Enhancement SPD; and,
- Planning Briefs SPDs

Supporting Information

- 4.1 This section of the LDS sets out:
- how the LDF will be structured by the Council and how different LDDs inter-relate in diagrammatic form;
 - the evidence base of the LDF, how it will be managed and the main background technical studies supporting it;
 - the arrangements for monitoring and review of the LDF, including the AMR and the annual review of the LDS; and,
 - the resources to be allocated to producing the LDF and the arrangements and responsibilities for programme management, risk assessment and any proposed contingencies.

Structure of LDF

- 4.2 In the previous section, the schedules provide a tabular interpretation of the documents that will form the Sedgefield Borough LDF. It is important that this table is illustrated diagrammatically for the community to easily understand the inter-relationship of the LDDs. This diagrammatic illustration is shown in Appendix 1.

Evidence Base

- 4.3 An important element of the production of the LDF is to provide a strong evidence base on which to base policies and proposals. The legislation requires this to be undertaken early in the LDF production process. The Council needs to prepare and maintain an up-to-date information base on all aspects of the social, economic and environmental characteristics of the Borough to enable the preparation of a 'sound' spatial plan.
- 4.4 The strategic information required for the evidence base, such as population trends and transport provision, will be developed in partnership with Durham County Council. Additionally, there will be specific elements of the evidence base that relate to work produced by the Borough. Briefly, these documents consist of the Community Strategy, and the resources required to deliver the policies and proposals of the LDDs. Furthermore, the LDDs will need to take account of the ability of infrastructure and utility companies to be able to accommodate new development in their service capabilities, and take account of hazardous installations.
- 4.5 In supporting the preparation of the LDD, a range of technical or background documents need to be produced. This work will be produced by, or for, the Council. Each technical/background document will be publicly available at the same time, or before, the publication of the LDD, which relies on its contents for justification. For example, the Strategic Flood Risk Assessment has been produced before either the Core Strategy or Major Allocations DPD.

- 4.6 Whilst a number of these technical/background documents can be identified now, this list is not exclusive and will be subject to review in future. The technical/background documents that have been published or will be required are:
- The Urban Capacity Study;
 - Housing Needs Survey;
 - Town Centre Surveys;
 - An Employment Land Survey;
 - Conservation Area Appraisals;
 - Biodiversity Action Plan;
 - The Community Strategy;
 - The County Durham Local Transport Plan;
 - The Open Space Needs Assessment;
 - Playing Pitch Strategy;
 - Green Space Strategy;
 - Play Strategy; and,
 - Sedgefield Borough Council Strategies including the Economic Development Strategy and the Housing Strategy.

Monitoring and Review of the LDF and LDS

- 4.7 The production of the LDF and LDS will be continually monitored through the proposed internal working arrangements with Members. It is proposed that the LDF Advisory Group will meet on a regular cycle to discuss progress on the LDF and makes recommendations on the approach undertaken. The minutes of these meetings will then be presented to the next meeting of the Cabinet and Development Control Committee for information.
- 4.8 A formal monitoring statement, in the form of an Annual Monitoring Report, will assess the effectiveness of LDDs and will specifically address whether policies and related targets have been met (or what progress has been made), what impact the policies are having on national, regional and local targets, and whether the LDDs need altering or replacing (if so, include suggested actions to achieve this). This monitoring statement will be prepared after the start of the financial year and will be published by the end of December each year.

Allocated Resources

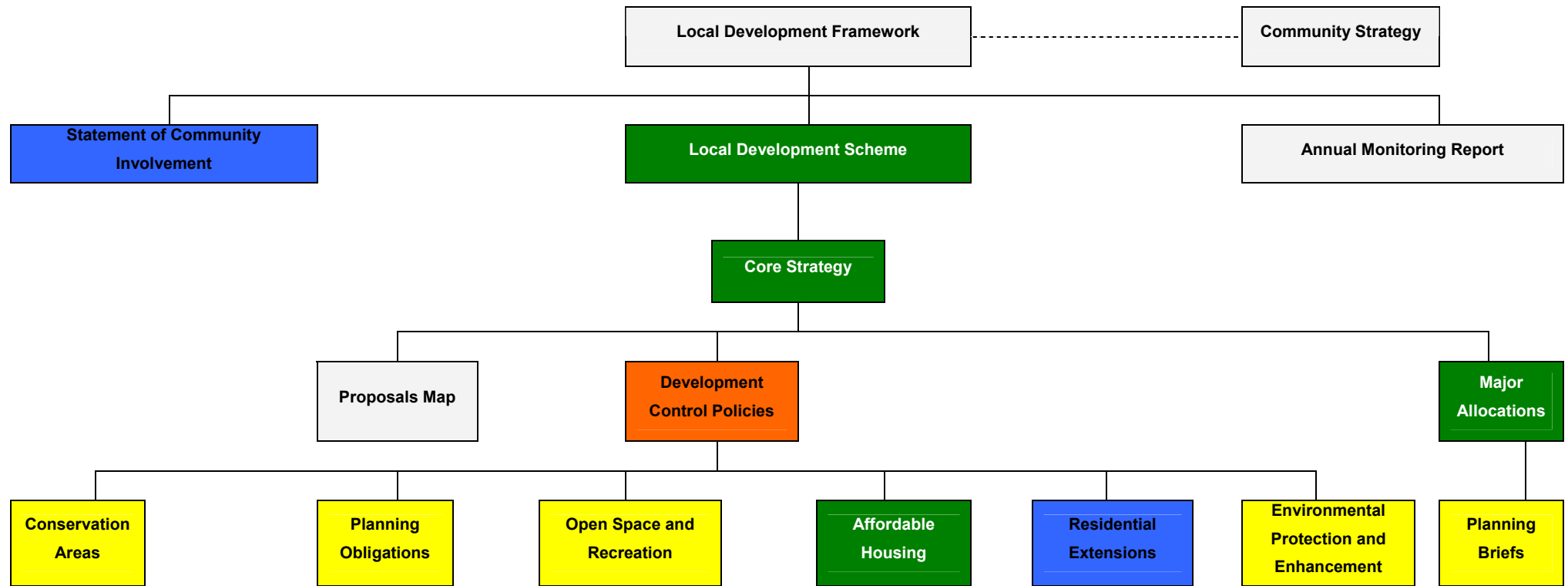
- 4.9 The Council's Forward Planning Team will lead the production, and programme management, of the LDF with emphasis on the proposed DPDs. In addition, the Council will work in partnership with colleagues from the County and District Planning Authorities in the preparation of the Joint SPDs.
- 4.10 The Council's Forward Planning Team consists of three Planning Officers, two Sustainability Appraisal Officers, a Design & Conservation Officer, a Landscape Architect, a GIS Officer, a GIS Assistant, an Arboriculturist and a Planning Technician. In addition, the Forward Planning Team will draw upon a number of internal resources to progress the LDF, including the Sustainable Communities Team, Housing Strategy and the Development Control Team.

Risk Assessment

- 4.11 The LDD preparation is based on a realistic assessment of the human and financial resources currently available to the Council and of the likely level of interest that the documents will generate from stakeholders and the local community. The Local Development Scheme has been subject to a Strategic Risk Assessment exercise and this is contained in Appendix 3. The specific risks can be summarised in the following general areas:
- 4.12 The Council's Forward Planning Team has limited resources and although assistance can be expected from other Teams, they are not likely to have the resources to offer more long-term assistance. Subject to the availability of funding, the use of consultants or joint working arrangements will be considered. However, the greatest risk involves staff retention. There is a significant skills gap in the Forward Planning profession. Although there are now no vacancies in the Council, if dedicated staff move on, they will prove difficult to replace in the current job market. This would have significant and serious implications for the programmed delivery of LDDs.
- 4.13 There are other staff implications, such as the risk that any significant illness and inexperience could cause delay. Where possible, consultants would have to be brought in to cover for long-term sickness but there will be difficulties in assimilating them into the work quickly. Moreover, the resources may not necessarily be available to fund them.
- 4.14 In order to develop the evidence base for the LDF will require the engagement of consultants to undertake specific projects e.g. Open Space Needs Assessment. Given other local authorities will be requiring similar work to be undertaken at the same time, there may not be enough experienced consultancies to carry out all of the work. This may make it more difficult to establish value for money and to ensure that the work is of a high enough standard. It may also mean delays as consultants struggle to deliver their commitments.
- 4.15 In order to minimise the risk of legal challenge in respect of LDD preparation process, we will work closely with colleagues at Government Office for the North East to ensure that the procedures adopted comply with the Planning and Compulsory Purchase Act 2004. This should also minimise the risk of a challenge on the 'soundness' of the document at the public examination.
- 4.16 Front-loading of community and stakeholder involvement should assist in resolving some concerns. However, there is a risk that should this interest significantly increase under the new arrangements, the Forward Planning team will be too small to cope and it may be necessary to recruit temporary staff to assist in the process.
- 4.17 The LDS timetable has been designed to reflect the timetable for the RSS preparation. Any delays to the RSS preparation will have a knock-on effect on the Council's ability to keep to its timetable. It seems reasonable therefore

that any delays will be reflected in the LDF timetable in future Local Development Schemes.

Appendix 1 – Structure of Local Development Framework



All DPDs/SPDs will be subject to a Sustainability Appraisal except the Statement of Community Involvement

- Main priority documents of the LDF
- Secondary priority documents of the LDF
- Indicative elements of the LDF
- Adopted LDF documents

Appendix 2 – Schedule of Proposed Local Development Documents

Document Title	Status	Brief Description	Chain of Conformity	Date of Preferred Options Consultation	Date of publication of Draft SPD	Date of Submission to Secretary of State	Proposed date for adoption
Core Strategy	DPD	Strategic document setting out the vision, spatial strategy and core policies for meeting known and anticipated development requirements to 2016.	With national PPSs, the RSS and in general conformity with the Community Strategy.	March 2007	N/A	March 2008	June 2009
Major Allocations	DPD	Sets out the location of new major development for the LDF period.	In general conformity with national PPSs, the RSS and the Core Strategy DPD.	July 2008	N/A	July 2009	September 2010
Development Control Policies	DPD	Sets out the land use development control policies for the LDF period.	In general conformity with national PPSs, the RSS and the Core Strategy DPD.	March 2009	N/A	December 2009	March 2011
Affordable Housing	SPD	The Affordable Housing SPD sets out detailed guidance for developers to the issues concerning the provision of affordable housing.	In general conformity with national PPSs, the RSS and the Core Strategy DPD.	N/A	May 2007	N/A	September 2007

Appendix 3 – Strategic Risk Assessment

Local Development Scheme 2006		RISK ASSESSMENT MATRIX						SHEET 1 OF 1		
								ISSUED BY		
								Chris Myers		
								ISSUED TO		
		LIKELIHOOD OF RISK HAPPENING	A	VERY HIGH		13		11	CW – Craig White MR – Michelle Robinson TB – Thomas Bennett GH – Glyn Hall CFGW – Charlie Walton NC – Noel Collings	
			B	HIGH				6		
			C	SIGNIFICANT		3	1, 2, 10			
			D	LOW		8, 9	4	5		
			E	VERY LOW			12	7		
			F	ALMOST IMPOSSIBLE						
		1. WRITE DOWN THE RISKS BELOW AND SCORE THEM. 2. ENTER THE RISK NUMBER FROM THE LEFT HAND COLUMN BELOW INTO THE RELEVANT BOX IN THE MATRIX ABOVE. 3. IDENTIFY THE TARGET SCORE, ENTER IN THE MATRIX ABOVE AND NOTE THE APPROPRIATE ACTIONS TO DEAL WITH THE RISK IN THE RIGHT HAND COLUMN BELOW.			4 NEGLIGIBLE	3 MARGINAL	2 CRITICAL	1 CATASTROPHIC	DATE ISSUED	
					IMPACT ON ACTIVITY OR PROJECT				23 August 2006	
									REVISION DATE	
									March 2007	
No	DESCRIPTION OF RISK (WHAT CAN GO WRONG)	LIKELIHOOD OF RISK HAPPENING	IMPACT ON ACTIVITY OR PROJECT	OVERALL SCORE	TARGET SCORE	ACTIONS REQUIRED TO ACHIEVE THE TARGET SCORE		ACTION BY	WHEN	
1	Staff leaving	C	2	C2	D2	<ul style="list-style-type: none"> Salaries should reflect market conditions Acceptable Office Environment Flexible Working Arrangements 		CM CFGW GH	Office Environment is being reconfigured in the Autumn to accommodate 3 additional staff. GH to raise issue at SMT. Opportunities to remotely access office to be arranged.	

2	Inability to recruit replacement staff	C	2	C2	D2	<ul style="list-style-type: none"> Salaries should reflect market conditions Acceptable Office Environment Flexible Working Arrangements 	CM CFGW GH	Office Environment is being reconfigured in the Autumn to accommodate 3 additional staff. GH to raise issue at SMT. Opportunities to remotely access office to be arranged.
3	Inexperience of existing/new staff	C	3	C3	-			
4	Long term illness to staff	D	3	D3	-	<ul style="list-style-type: none"> Need for regular health checks for staff 	ALL	To be considered by Healthy Workplace Initiative (GH)
5	Inability to appoint specialised consultants to develop sound evidence base	D	1	D1	D3	<ul style="list-style-type: none"> Need to identify specialised consultants early in process of developing evidence base Need to develop comprehensive tender documentation to ensure projects cover all relevant issues Further develop Partnership Working with other Councils 	CM MR TB	
6	Lack of financial resources to develop sound evidence base	B	1	B1	D3	<ul style="list-style-type: none"> Need sufficient budget to undertake work that is required by statute 	CM CFGW GH	To be discussed at Attractive Borough Working Group - September
7	Planning Inspectorate finding documents "unsound"	E	1	E1	-	<ul style="list-style-type: none"> Need to ensure that internal checks are in place to assess quality and soundness prior to documents being published. Work with Durham County Council, acting as agent of North East Assembly to ensure conformity with RSS Attendance at training seminars Undertake peer review 	ALL	PAS organise peer reviews of Planning Services. Need to investigate opportunity to undertake the peer review.
8	Regional Spatial Strategy workload	D	3	D3	-	<ul style="list-style-type: none"> Issues linked to Risks 1 & 2. If staff leave, the risk will increase and become red. 		
9	Increased community involvement as result of front-loading	D	3	D3	-	<ul style="list-style-type: none"> Community engagement will increase when documents consider land allocations 	CM CW MR TB NC	Review in September 2007
10	Inability to programme SA workload with Teesdale & Wear Valley Councils	C	2	C2	C3	<ul style="list-style-type: none"> Project manage process through monthly management meetings Continue with Partnership Working 	CM MR CW NC	Need for continued dialogue and project management with TDC & WVDC to ensure risk is minimised

11	Requirement to undertake Appropriate Assessment	A	1	A1	E1	<ul style="list-style-type: none"> No current Government guidance Documents will be found to be unsound if work is not completed Need to resolve manageable solution through Partnership Working with other Councils 	CM CFGW GH	County Durham POS to discuss issue in September
12	Legal Challenge	E	2	E2	-			
13	Changing Government Guidance	A	3	A3	A4	<ul style="list-style-type: none"> Need to respond to Government consultations to influence guidance 	CM MR TB CW	

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