

**BRECKLAND COUNCIL**  
**OVERVIEW AND SCRUTINY PANEL 1 – 24<sup>th</sup> JULY 2007**

**REPORT OF THE OPERATIONS MANAGER - ENVIRONMENT**  
**(Author: David Spencer, Principal Planning Policy Officer)**

**BRECKLAND LOCAL DEVELOPMENT FRAMEWORK**  
**PROGRESS REPORT AND UPDATE ON RECENT BEST PRACTICE AND**  
**ADVICE**

**Summary:** This report informs Members of progress on the Breckland Local Development Framework (LDF) and the latest best practice and advice on how to prepare Local Development Frameworks and the new spatial planning agenda. Additionally this report assesses Breckland's progress on its LDF relative to surrounding authorities. The Report also re-affirms the key tests which all LDFs, including Breckland's, will be subjected to through the independent Examination process and draws out examples from those authorities who have so far failed to deliver a sound LDF.

**1. INTRODUCTION**

- 1.1 The current Development Plan for Breckland consists of Regional Planning Guidance 6 (which covers Norfolk, Suffolk and Cambridgeshire to 2016), the adopted Norfolk Structure Plan (2001) and the adopted Breckland Local Plan (1999). The introduction of the Planning & Compulsory Purchase Act at the end of September 2004 changed the development plan system. Regional Planning Guidance and County Structure Plans will be replaced by Regional Spatial Strategies (RSS). At the local level, Local Plans will be replaced by Local Development Frameworks.
- 1.2 There will be a new RSS for the East of England (covering Norfolk, Suffolk, Cambridgeshire, Essex, Bedfordshire and Hertfordshire to 2021). The draft was prepared by the East of England Regional Assembly (EERA) and is now being finalised by the Secretary of State. LDFs are the statutory responsibility of Local Planning Authorities. County Council's retain a role as monitoring authority and for preparing County wide Minerals and Waste Development Frameworks. Breckland has embraced the new LDF system and has for some time been leading the way locally in delivering the new system. A number of factors have impeded the initial progress and these are addressed in detail in the Report.
- 1.3 One factor that has impinged on LDF progress has been the fact that guidance accompanying the new Planning Act has been continually evolving over the last 3 years. A key element of the new Act is the requirement that LDFs need to be rooted in spatial planning. This is a new concept and a move away from the solely land-use planning approach which underpinned the Local Plan system. A number of authorities have prepared new LDFs in a similar style to Local Plans and this approach has been rejected. The theory around spatial planning has baffled many practitioners and is only now becoming better understood and interpreted. In essence, spatial planning is about:
- Integrating policies for the development and use of land with other policies and programmes;
  - Having a vision based on sound evidence, local distinctiveness and community objectives;
  - Recognising the LDF is not exclusively a technical planning document but the Local Authority's central delivery document, alongside the Sustainable Community Strategy;

- Having aspirations for communities but having a realistic and clear delivery framework.

1.4 For Members new to the Authority and this Overview and Scrutiny Panel a diagram of the Local Development Framework folder of documents is provided at Appendix A for reference.

## **2. KEY DECISION**

2.1 This is not a key decision.

## **3. EQUALITIES, HUMAN RIGHTS AND CRIME & DISORDER**

3.1 This report raises no issues relating to Equalities, Human Rights and Crime and Disorder.

## **4. COUNCIL PRIORITIES**

4.1 The matters raised in this report fall within the following Council priority:

- A well planned place to live which encourages vibrant communities

## **5. PROGRESS ON BRECKLAND'S LOCAL DEVELOPMENT FRAMEWORK**

### **Work to Date**

5.1 Breckland's Local Development Framework will be a suite of documents. The initial suite will contain documents for a Core Strategy, Development Control Policies, Site Specific Proposals and an Area Action Plan for Thetford. The Authority has already adopted a Statement of Community Involvement and has produced required Annual Monitoring Reports. The focus of LDF work has been on a joint Core Strategy and Development Control Policies document. This will set out the spatial vision and objectives for the District and the strategy needed for delivery. The Development Control policies will further guide and control the delivery of new development and its contribution towards supporting sustainable communities. Whereas the Local Plan contained a detailed compendium of over 120 development control policies, the new LDF will contain a refined collection of more meaningful policies, perhaps as few as 30 policies.

5.2 Breckland's approach of preparing a Core Strategy and Development Control policy document jointly is endorsed by the Government Office and will be supported, in principle, by the Planning Inspectorate. A number of concerns have been raised that a replacement policy framework is required in the interim before the Local Development Framework is adopted. Recent advice from the Government Office affirms that the Core Strategy should be the first LDF document produced by Local Planning Authorities. Interim policies produced on an adhoc basis will be given no weight in the planning process.

5.3 Breckland has already produced a number of drafts of its Core Strategy and Development Control Policies document. A series of roadshows were held in the summer of 2005, followed by the publication of a draft document in October 2005. Your Officers have also held various meetings across the District with Town and Parish Councils and other organisations, including all Town Councils and prospective Local Service Centre villages. Following changes in Government Guidance a further round of consultation was undertaken in March of this year which revisited the development strategy and a number of policy areas. An outline of the results of the consultation is provided in Section 8 of this Report.

### **Factors Affecting Progress**

- 5.4 Your Officers are aware that there is a developing anxiety that the Breckland Local Development Framework is taking some time to produce now that we are 3 years into the new system. There are a number of factors which have influenced this situation and need to be taken into account. Nevertheless Breckland is making reasonable progress in the local context and this is explored in Section 6 of this Report. The factors affecting Breckland are not unique to the District but given the scale of growth the District needs to accommodate and the demands of the spatial planning agenda it is important that these factors are satisfactorily resolved to protect Breckland from having an unsound LDF and/or facing judicial review at a later stage.

#### **(1) Delays to the Regional Spatial Strategy (RSS)**

- 5.5 The RSS for the East of England provides the housing and employment requirements for Breckland over the period 2001-2021. During this time the District needs to accommodate 15,200 new homes and 6,000 new jobs. The RSS also identifies Thetford as a Regional Key Centre for Development and Change, linking in with Thetford's successful designation as a National Growth Point. The RSS specifies that Thetford will deliver at least 6,000 homes. The strategic direction of the RSS needs to be reflected in the Breckland LDF and will provide higher level certainty for the local development strategy. The RSS was due to be adopted in summer 2007. However, the Secretary of State has now advised that further time is needed to assess the impacts of the RSS on European Habitats in the Region (a process known as Appropriate Assessment). This will delay adoption of the RSS until Autumn 2007 at the earliest. The Regional Appropriate Assessment work is critical in the Breckland context given the proximity of European Habitats to Thetford. It is your Officers' assessment that Breckland will need the clarity of the Regional Appropriate Assessment to advance its own LDF.

#### **(2) Evolving Guidance on LDFs**

- 5.6 The introduction of the new Planning Act in Autumn 2004 was accompanied by Regulations. These Regulations are open to interpretation and in the void of detailed guidance on implementing LDFs the approach of a number of authorities has been flawed. Advice at the time was for LDF Core Strategies to be strategic and visionary and for much of the detail to be delegated to Site Specific documents, Area Action Plans and Supplementary documents. As the new system is being implemented a number of studies by Government bodies are now advising that there is a shift in emphasis on Core Strategies being more detailed and specific about where development will occur. The latest guidance is outlined in Section 6 below.

#### **(3) Developing and Maintaining an up-to-date Evidence Base**

- 5.7 Government Guidance on detailed topics such as Housing, Flood Risk and European Habitats has been fully revised in the last 3 years. New requirements emerging from the guidance include: producing Strategic Housing Land Availability Assessments; updating Strategic Flood Risk Assessments and carrying out an Appropriate Assessment on European Habitats. Advice from the Planning Inspectorate requires that Local Authorities have a sound evidence base when submitting their LDF documents for examination. Breckland has made considerable progress in producing the required evidence base, however, parts of this evidence base now need updating to meet latest Government guidance and the absence of evidence required by legislation (i.e. Appropriate Assessment) will result in an unsound LDF.

- 5.8 The requirement to prepare an Appropriate Assessment is particularly demanding and has already impacted on the preparation on the Regional Plan. The presence of significant areas of European Habitat in the south and west of the District, together with the River Wensum and Scarning Fen in the north, mean that this is a key piece of work. A methodology has been agreed with Natural England although further work is needed in the Brecks to assess impacts on Stone Curlews, Woodlarks and Nightjars. The volume of work required to satisfy the Appropriate Assessment is considerable and various research projects involving the RSPB and Forestry Commission are underway.

#### (4) Staff Turnover

- 5.9 Breckland is not immune from the current national shortages of professional planners. The situation is relatively critical for Breckland. The core team delivering the LDF consists of 2 full-time planning officers, supported by the Environmental Planning Manager. Two Planning Policy Officers have left the team in the last 5 months due to promotion, reflecting the current competitive market for Planners. Recruitment and retention of Planners is a risk to delivering the LDF. Most authorities in Norfolk have larger, and more established, teams preparing their LDFs. Conversely some neighbouring authorities (Forest Heath and King's Lynn & West Norfolk) are experiencing particularly challenging recruitment issues to fill LDF posts.

#### (5) Sustainable Community Strategy

- 5.10 The LDF needs to be seen as a key delivery mechanism for the Sustainable Community Strategy. The Breckland Local Strategic Partnership (LSP) has committed to refresh the existing Community Strategy into a Sustainable Community Strategy by early 2008. The preparation of both the LDF and the Sustainable Community Strategy need to be closely aligned. Both documents need to share a joint evidence base on the Characteristics of the area. In order to achieve this a temporary Research Officer will be appointed for a 3 month contract over the summer to refine and update existing evidence that has been collated.
- 5.11 These five key factors need to be considered and are reflected in the timetable for the preparation of the LDF outlined in Section 10 of this report.

### **6. ADJOINING AUTHORITIES' LOCAL DEVELOPMENT FRAMEWORKS**

- 6.1 The situation affecting Breckland's LDF needs to be considered in the context of how adjoining authorities are progressing their LDFs. All authorities in Norfolk and adjoining authorities in Suffolk are focussing on their Core Strategy as their first LDF document. A number of authorities are also incorporating their Development Control policies with the Core Strategy.
- 6.2 North Norfolk is the first authority to be submitting its Core Strategy and Development Control Policies Document. It is your Officers understanding that this submission is not without its risks, with parts of the evidence base (ie Strategic Flood Risk Assessment) yet to be finalised and issues around the Development Strategy yet to be resolved. North Norfolk's experience will be reported to this Panel and a number of Norfolk authorities are awaiting to see if their approach will be found sound.
- 6.3 Great Yarmouth and Breckland are the next two authorities timetabled to submit their Core Strategies in 2008, although Great Yarmouth are preparing their Development Control policies separately in a later document. Breckland has taken steps to revisit the LDF evidence base and re-consult the public and key stakeholders on a number of strategic areas early in 2007. This work puts Breckland on a surer footing to submit a sound LDF document. King's Lynn and Forest Heath Councils have now

recognised the need to revisit their LDF work and this will put their submission documents behind Breckland. Also behind Breckland are the Greater Norwich authorities (Broadland, Norwich City and South Norfolk) who have been directed to produce a joint Core Strategy. They are currently consulting on Issues and Options and are unlikely to submit their Strategy until 2009 at the earliest. St Edmundsbury in Suffolk also adjoins Breckland, they are currently preparing their Issues and Options and are unlikely to submit their Core Strategy until 2009.

- 6.4 As this section of the report demonstrates, Breckland is in the leading pack of Norfolk authorities working towards having a sound LDF Core Strategy and Development Control policies. Members may also note that other authorities are recognising the need to do additional work and Breckland is in an advantageous position having taken an early decision to review key parts of the background work.

## **7. SUMMARY OF RECENT BEST PRACTICE AND ADVICE**

- 7.1 As outlined in paragraph 5.6 above, a considerable amount of updated and revised guidance is emerging on how to implement the LDF system. This section of the Report details some of the latest guidance which needs to be taken into account when finalising the Breckland LDF.

### Advice from the Planning Inspectorate: June 2007

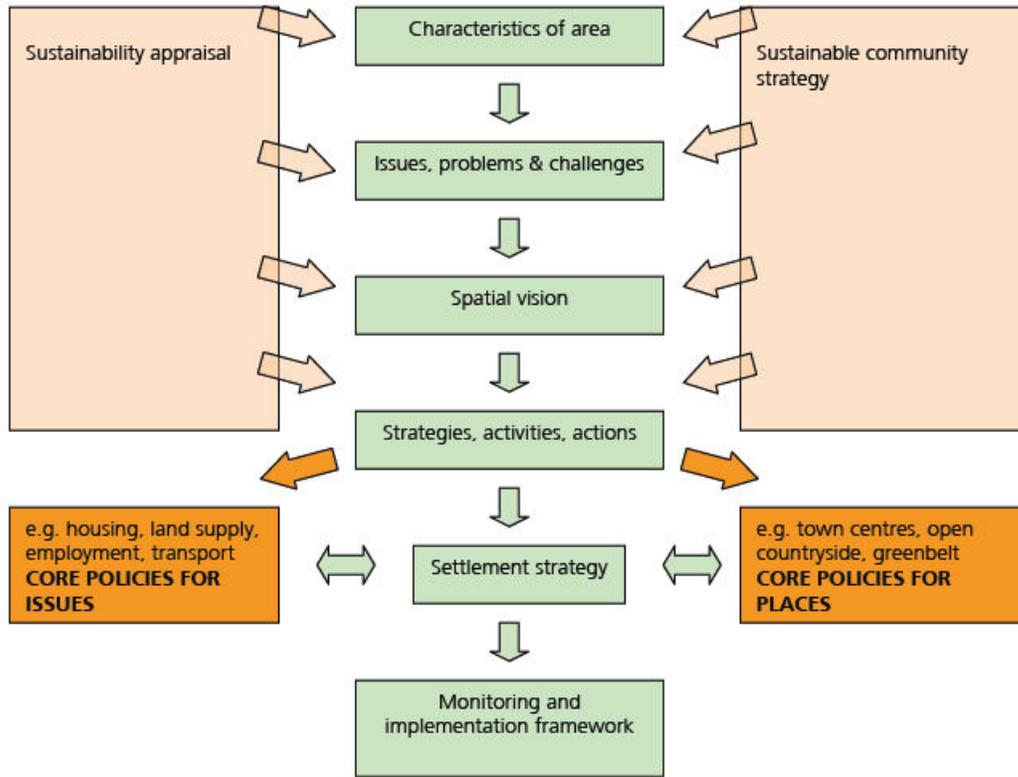
- 7.2 At the end of June 2007, the Planning Inspectorate, the Government Body who will examine the Breckland LDF, published a report entitled 'Local Development Frameworks: Lessons Learnt'. This report assesses the early wave of LDFs that have been submitted to the Inspectorate, a number of which have been found to be unsound. The Inspectorate's criticisms of early LDFs can be summarised as follows:
- Evidence needs to be submitted with the Document, not hastily prepared as an afterthought once the document has been written.
  - Core strategies are failing to add a local dimension to regional or national guidance and policy
  - LDFs are insufficiently spatial: delivery is as critical as the use of land
  - Core Strategies should pinpoint specific sites rather than suggesting general aspirations.
  - Self-assessment should be a continual part of the process, not an add-on at the end.

### Planning Advisory Service:

- 7.3 The Planning Advisory Service (PAS) is hosted by the Improvement and Development Agency (IDeA). The IDeA works for local government improvement so councils can serve people and places better. PAS has published various guidance on how to implement the new LDF system in the last 6 months including:
- Effective Practice In Spatial Planning (May 2007)
  - Planning together: local strategic partnerships and spatial planning (March 2007)
  - LDF Soundness: Self Assessment Toolkit (updated)
  - Core Strategy Guidance (December 2006)

- 7.4 PAS has recognised that local planning authorities are anxious to receive additional guidance on what a Core Strategy should contain. The Core Strategy Guidance produced at the end of 2006 provides a good idea of what a Core Strategy should look and feel like. Figure 1 below is taken from the guidance (the full version can be viewed at [www.pas.gov.uk](http://www.pas.gov.uk)) and illustrates the steps required to produce a sound Core Strategy. A key element is integration with the Sustainable Community Strategy.

figure 1: core strategy key elements



### Government Advice

- 7.5 There has been no substantive updates to existing Government Advice on LDFs contained in Planning Policy Statement (PPS) 12 and its companion document 'Creating Local Development Frameworks'. At a more local level the Government Office in the East of England is advocating a very similar line to that contained in the Advice note from the Planning Inspectorate. The key messages are around the adequacy of spatial visions, objectives and strategies; their local distinctiveness and the technical process that Local Planning Authorities are going through to develop and test options for policies. Additionally, the local Government Office is promoting that LDF Core Strategies are more specific about levels of development and the spatial distribution, including the identification of key sites and their delivery. At the time of writing this report the only authority in the East of England that has an adopted Core Strategy is South Cambridgeshire and that was only passed sound with caution.
- 7.5 In September 2006 this Panel considered the outcomes of the first LDF Core Strategy Inspector Reports that were published in August 2006. The Reports found that both Stafford and Lichfield were unsound and both authorities were directed to re-prepare their LDF documents at their own expense. Since then a number of other authorities have been found to be unsound in their LDF Core Strategies including Ryedale (North Yorkshire), Chichester and Waverley. The lessons from these authorities are similar to those for Stafford and Lichfield. Appendix B of this report outlines the lessons from Stafford and Lichfield and the steps taken to address those issues. Conversely a handful of LDF Core Strategies have been found to be sound,

including South Cambridgeshire, Plymouth, Hambleton (North Yorkshire) and South Hams (Devon). Interestingly, it has recently been quantified by Hambleton that it has cost the authority £1.7million to prepare its Core Strategy.

## **8. SUMMARY LDF DEVELOPMENT CHOICES CONSULTATION RESPONSE**

- 8.1 In March additional consultation was undertaken on the Core Strategy and Development Control Policies in an Issues and Options document known as “Development Choices”. The purpose of the consultation was to revisit some of the options around the development strategy and selected policies where government guidance has recently changed (i.e. climate change, housing and car parking). The consultation started on 19<sup>th</sup> March and ended on 4<sup>th</sup> May. For the first time the consultation included an interactive on-line consultation and some 600 comments were made through the website. A total of 1400 comments were made on “Development Choices” and they can be viewed by everyone on-line at the Breckland website. The comments have been summarised and have generated a 400 page report. These comments will need to be reported to this Panel when considering the preferred spatial strategy and policy options for Breckland.
- 8.2 In summary the consultation was successful in providing additional detail on choices around the development strategy. This enabled a good response from a number of key stakeholders including Environment Agency, Anglian Water, Norfolk County Council, the Government Office and numerous Town and Parish Councils. Their response will enable the production of a more responsive and deliverable LDF.
- 8.3 The consultation reveals that the options for the strategies and levels of developments earmarked for the towns is on the right lines and deliverable. We will need to look more closely at Attleborough and its transport issues and the presence of European habitats close to Thetford. There was widespread agreement that the LDF needs to look beyond 2021 to 2026 to ensure housing is delivered and there is long-term certainty about where development will occur. Options around reducing the density of developments in the villages to as low as 22 homes per hectare (9 per acre) and increasing parking in residential areas to reflect local circumstances also received significant endorsement.
- 8.4 Further work and more evidence is clearly needed around which villages are to be identified as ‘Local Service Centres’ and how the LDF is going to address concerns about how rural housing needs. A number of alternative Local Service Centre villages have been suggested (i.e. Bawdeswell, Shropham, Litcham) and this is balanced by comments in support of protecting the rural areas and limiting new development. In conclusion the consultation has not revealed any major showstoppers at this stage which would prevent the delivery of a development strategy in broad alignment with that which was consulted on.

## **9. TESTS OF SOUNDNESS**

- 9.1 Members are reminded that when the Core Strategy & Development Control Policies document is submitted to the Secretary of State, it will be examined by the Planning Inspectorate who will test its ‘soundness’ against the following tests:-
- 1 how the proposed change relates to the core strategy (unless it is the core strategy development plan document);
  - 2 how it relates to the community strategy;

- 3 whether it would be in general conformity with the regional spatial strategy and be consistent with national planning policy;
- 4 whether it is consistent with any other development plan document;
- 5 whether it is consistent with other relevant plans and strategies which will affect the delivery of the policies in the plan, e.g. local transport plans;
- 6 whether it has any environmental, economic or social implications that have not already been covered in the sustainability appraisal;
- 7 whether the proposed change requires the preparation of a revised sustainability appraisal; if so whether this has been done or, if not, how it is to be done; and
- 8 what further consultation has been undertaken by the local planning authority in accordance with the statement of community involvement.

9.2 Failure to submit a 'sound' document could result in either a binding Inspectors Report with fundamental changes or a Direction that the authority prepares, at its own expense, another document for submission.

## 10. **FUTURE WORK PROGRAMME FOR BRECKLAND LDF**

10.1 Your Officers consider that there are 3 key workstreams for the LDF in the next 12 months. The Table below sets out the key milestones and how they need to be managed.

Document	Milestone	Committee	Public Consultation
Core Strategy & Development Control Policies	Consultation of Preferred Options	Panel 1, Overview & Scrutiny Commission and Cabinet	Late November 2007
	Submission to Secretary of State	Panel 1, Overview & Scrutiny Commission, Cabinet, Full Council –	June 2008
	Examination in Public – late 2008		
Site Specifics	Collate Evidence Base	Start formal dialogue with Town and Parish Councils when Preferred Strategy agreed in early October 2007	n/a
	Consult on Issues and Options	Panel 1 – April/May 2008 Cabinet – May/June 2008	Summer 2008
Thetford Area Action	Collate Evidence Base	Work ongoing	
	Consult on Issues and Options	Moving Thetford Forward Steering Group, Overview & Scrutiny and Cabinet	To be determined in 2008

10.2 In pursuing this timetable Breckland should have an adopted Core Strategy and Development Control document by early 2009, an adopted Site Specifics document by end of 2010 and an adopted Thetford Area Action Plan by end of 2010. A full colour chart detailing the LDF timetable can be viewed on-line at [www.breckland.gov.uk](http://www.breckland.gov.uk), paper colour copies will be distributed at the Panel meeting.

**11. OPTIONS AVAILABLE**

11.1 There are no options available.

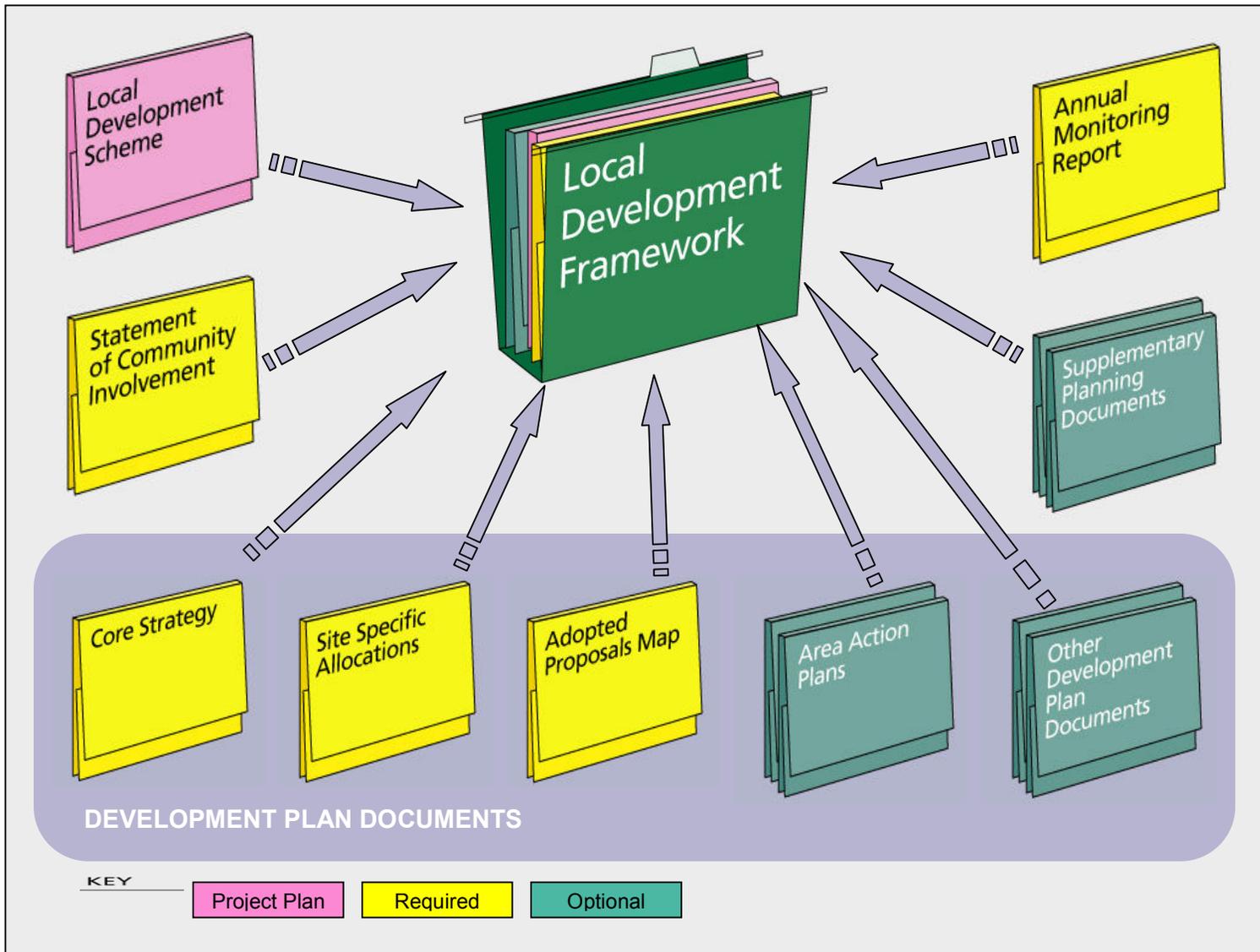
**12. REASONS FOR RECOMMENDATION**

12.1 The Report is for information and future use in the scrutiny of the LDF.

**RECOMMENDATION TO OVERVIEW AND SCRUTINY PANEL 1**

12.2 Members are requested to note the contents of the Report.

*This report has taken account of the need for compliance with the Council's Equal Opportunities Policy and the requirements of Section 17 of the Crime and Disorder Act 1998 and the Human Rights Act 1998. This report raises no matters to which attention specifically needs to be drawn under the legislation.*



## Appendix B

Inspectors' Criticisms of Stafford and Lichfield LDFs	Application to Draft Breckland LDF 2006	Action Taken
<p><b>Detail on issues such as housing numbers and jobs distribution should not be resolved at the Site Specifics stage. Therefore, more meaningful options should have been presented at an earlier stage for the public to comment on.</b></p>	<p>At present the Core Strategy only gives a broad outline of the scale of growth in the Development Strategy policy (i.e. Strategic Growth in Thetford). In the absence of detailed government guidance this was considered an acceptable level of detail with specific numbers to be hammered out through the site specific process. To avoid similar criticisms, Breckland's Development Strategy needs to be more specific, setting out housing numbers and jobs numbers for each settlement named in the Strategy. This work can largely be done from existing monitoring, but supplementary evidence is needed from an updated Urban Capacity Study (Strategic Housing Land Availability Assessment) and a Jobs Distribution forecast for accuracy. Importantly, extra consultation will be needed on the options behind the precise numbers so that agencies, service providers, developers and the public can comment on the exact scale of growth.</p>	<p>The Development Choices Consultation (March – May 2007) set out options for a more specific strategy. It included possible housing numbers, jobs and retail floorspace figures. This evidence has enabled many stakeholders to comment on the numbers and advise Breckland Council on issues around delivery, environmental constraints and infrastructure requirements.</p>
<p><b>Lack of local distinctiveness leading to “bland” policies that could be applied anywhere</b></p>	<p>The criticism applies to the Breckland LDF and was an issue identified by the joint Panel and Development Control Committee sessions. Whilst the LDF as drafted is technically robust, it does need more of a local ‘flavour’ added to it where appropriate to make the plan more Breckland specific. Some policies such as the Local Biodiversity Conservation are already very Breckland specific, however, further work needs to be done to add a more local flavour to the Strategy and policy framework.</p>	<p>This is a key area which still needs addressing. The development of a joint ‘Characteristics of Breckland’ Report which will be used for both the LDF and the Sustainable Community Strategy will tackle this area and provide an up-to-date baseline position from which to refine the Spatial Vision, Strategy and Policies for Breckland.</p>

<p><b>Absence of information / evidence base to support the policies, especially delivery of housing numbers.</b></p>	<p>It is the advice of your officers that the Breckland evidence base is more robust than that submitted by Lichfield and Stafford. However, there are areas where we need more evidence to underpin the strategy and policies, particularly where we need to make our approach more locally orientated. In particular, additional work is needed to ensure that the evidence base extends to 2021.</p>	<p>In the past 9 months the following evidence has been assembled:</p> <ul style="list-style-type: none"> <li>(1) Strategic Housing Market Assessment (2007)</li> <li>(2) Breckland Housing Needs Study (2007)</li> <li>(3) Breckland Affordable Housing Viability Study (2007)</li> <li>(4) Breckland Landscape Character Assessment (2007)</li> <li>(5) Breckland Town Centre and Retail Study Update (2007)</li> </ul> <p>The following work has been commissioned and is due to be completed in the next 3 months:</p> <ul style="list-style-type: none"> <li>(6) Breckland Landscape Character Assessment – Fringe Study</li> <li>(7) Strategic Flood Risk Assessment Update</li> <li>(8) Strategic Housing land Availability Assessment</li> <li>(9) Open Space Assessment &amp; Play Strategy</li> <li>(10) Appropriate Assessment of European Habitats</li> </ul>
<p><b>Lack of spatial policies and evidence that other Authorities will deliver on the LDF Strategy. In particular lack of spatial expression of the Community Strategy.</b></p>	<p>Again, this is a criticism that applies to the Breckland LDF. The issue for the LDF is compounded by the nature of the Community Strategy which itself a document with little local distinctiveness and detailed policies, targets and indicators which the LDF should be working to deliver. However, this should not detract from the need to spell out more clearly how the LDF will meet local community needs and how policies will be implemented. In this regard more specific references to the plans, programmes and strategies of other agencies will be required and where applicable evidence of Breckland Council's commitment to deliver the policy framework.</p>	<p>The Community Strategy is being revised into the Sustainable Community Strategy (SCS). LDF Officers are integral to this process and will be involved in the preparation of the SCS. Reciprocally, the Corporate Policy Team and key LSP stakeholders have been, and will be involved in the LDF. The LSP was presented with a Paper in April 2007 outlining the need for the two documents to be connected and the opportunities/methods for achieving this.</p>
<p><b>Inclusion of policies contrary to government guidance</b></p>	<p>As currently drafted the Breckland Core Strategy and Development Control Policies are not contrary to national or regional guidance. It is important that Breckland does not fail this test of soundness. However, in achieving this status, the policy framework as drafted is not as locally distinctive as it could be (as identified above).</p>	<p>Revisions to the LDF will ensure that there is no repetition or contradiction of regional or national planning guidance.</p>

