# Herefordshire Core Strategy 2011 - 2031

# DRAFT INSPECTOR'S MATTERS AND ISSUES

(December 2014 Version 1)

#### Hearings:

The hearings are scheduled to take place over eight days on 10 - 12 and 17 - 19 and 24 - 25 February 2015 and will be held at:

# Hedley Lodge, Belmont Abbey, Ruckhall Lane, Hereford, HR2 9RZ commencing on Tuesday 10 February 2014 at 1000 hours.

#### Purpose of the Examination:

The Examination starts from the assumption that the Council has submitted what it considers to be a sound Plan and that the Council has fulfilled its legal duty with regard to the Duty to Co-operate. The Hearings will therefore be concerned only with considerations relating to the soundness of the document and the legality of the process followed, and all submissions should address those issues as appropriate.

#### Guidance

The Planning Inspectorate has produced Guidance for those taking part in Local Plan Examinations<sup>1</sup>. Further specific guidance in relation to this Examination is in the guidance notes attached to this document.

#### Further statements:

The Inspector requests written responses from the Council to all the matters raised.

The Inspector will give equal weight to Representors' views put orally or in writing.

Written Statements from Representors are not compulsory but, if Representors feel a statement is warranted, they should confine themselves to matters raised in their original representations.

Please note there is a 3,000 word limit on written statements.

In any further Written Statements from Representors it would be very helpful for the Inspector to have a brief concluding section stating:

- what part of the Plan is unsound
- which soundness criterion it fails and why
- how the Plan could be made sound
- the precise change and/or wording that you are seeking

There may be matters and issues that cut across each other and it is not necessary to repeat the same points under each section. A note referring to previous points would be sufficient.

#### Statement deadlines:

All Statements from those Representors who are making representations to the Hearing Sessions must be sent to the Programme Officer by **midday on Tuesday 13 January 2015**. This deadline is absolute and relates to the receipt of both paper and electronic copies.

Statements from the Council must be sent to the Programme Officer by **midday on Tuesday 20 January 2015**. This deadline is absolute and relates to the receipt of both paper and electronic copies.

**Programme**: A draft timetable will be sent out shortly.

#### If you have any queries – please contact Rosalind Fallon, the Programme Officer at:

- Email: programme.officer@herefordshire.gov.uk
- Telephone: 07792 881833
- Address: c/o Herefordshire Council, Plough Lane, Hereford, HR1 0LE

<sup>&</sup>lt;sup>1</sup> <u>http://www.planningportal.gov.uk/uploads/pins/dpd\_procedure\_guide.pdf</u>

#### Matters and Issues

Please note that if the Inspector is satisfied that an issue has been satisfactorily addressed in the submitted Statements it is possible that it may not be included in the final Hearing Agenda.

The Matters and Issues may therefore change as the Hearings approach. Please view updates on the Examination page of the Council's web-site<sup>2</sup>.

Matters and issues relating to **minerals and waste** will form a separate document and are not addressed in the matters below.

#### Matter 1 - General matters

## Issue

#### Questions

1. Has the Council complied with the duty to co-operate in the preparation of the Plan?

Who has the Council engaged with in terms of housing, transport and other strategic issues? When did this engagement begin, has it been active and ongoing and what form has it taken? Specifically how has the Council engaged with other local authorities?

What is the situation regarding adopted/emerging plans in neighbouring authorities and strategic issues such as housing, employment, retail, biodiversity and transport?

In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this been addressed? Are there any matters to resolve?

- 2. Has the Core Strategy been the subject of suitably comprehensive and satisfactory Sustainability Appraisal and if not, what else needs to be done?
- 3. Is there clear evidence demonstrating how and why the preferred strategy was selected, including appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?
- 4. Has the Core Strategy been prepared in accordance with statutory requirements?

#### Matter 2 - Vision, objectives and spatial strategy

#### Issue

Has the Plan has been positively prepared and is it justified, effective and consistent with national policy in relation to the overall provision for housing and employment, movement and transport, and the environment?

#### Questions Policy SS2

Overall provision for housing.

<sup>&</sup>lt;sup>2</sup> https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/core-strategy/examination-of-the-herefordshire-local-plan-core-strategy

- 1. What are the full objectively assessed needs for housing in the Housing Market Area? How have these been identified and what is the evidence base?
- 2. What role do the Government's household projections (2008 based and 2011 interim projections and any later projections) have in identifying objectively assessed needs? Should these projections be used as the basis to identify objectively assessed needs? If not, why?
- 3. Does the evidence base for the objectively assessed needs reflect national policy and guidance, in particular the most recent Planning Practice Guidance? Is the evidence up to date?
- 4. What are the assumptions for the proposed level of housing provision in terms of population growth, migration, jobs growth, commuting patterns, household formation, market signals, affordable housing and build rates? What is the basis for these assumptions in terms of evidence and are they realistic? How do they compare with trends?
- 5. Would the provision of a minimum of 16,500, between 2011-2031, meet the full objectively assessed needs for housing? If not, are there local policy considerations to be taken into account?
- 6. Is it of the right type and scale and in the right place to provide a mixed, balanced and healthy community and support sustainable growth?
- 7. What options were considered for the overall provision for housing? When and how were these options considered? What evidence informed this decision and what was the role of sustainability appraisal in the process?

## Housing trajectory and policy SS3

## NB. Strategic sites will be dealt with in the sessions on place shaping

- 8. Is the Council's housing trajectory, with a lower figure of 600 for the first five years rising to 950 for the last 15 years, justified, having regard to the need for housing and the deliverability of strategic sites? What options were looked at and tested before deciding upon the figures?
- 9. Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF? What would the requirement be for a five year supply including a buffer? Is there a shortfall and how has this been taken into account?
- 10. Would the Plan realistically provide for a five year housing supply (5YHLS) on adoption? Will a five year supply be maintained?
- 11. Paragraphs 3.41 and 3.42 of the CS indicate that strategic housing targets are dependent upon key elements of infrastructure. What are the prospects of the transport infrastructure requirements being delivered? Are these realistic and supported by evidence?
- 12. How has the Council assessed the effect of the possible delay/failure of key infrastructure coming forward within the desired timescale? How would this affect the 2014-2019 housing land supply and the overall housing targets?
- 13. How has flexibility been provided in terms of the potential supply of housing land and its dependence on transport infrastructure? Is this sufficient?
- 14. What is the status of the Nutrient Management Plan? How have the implications of this plan been tested with regard to delivery of the strategic sites? What are the implications for the first five years of the CS, the 2014 2019 housing land supply, and longer term delivery of the strategic sites?
- 15. Is policy SS3 necessary, justified, effective and consistent with national policy? Will it prevent satisfactory development coming forward? How will the policy be implemented?

- 16. How has the trigger in policy SS3 for the allocation of additional land been arrived at? What evidence is it based upon and what other options have been considered?
- 17. What does the Council mean by intervention in paragraph 3.46? Is this consistent with the NPPF? Could it prevent satisfactory development coming forward?

## Movement and Transport

## Policy SS4

- 18. What evidence is there that the movement and transport strategy would ensure the provision of viable infrastructure necessary to support sustainable development?
- 19. How will the strategy contribute to wider sustainability and health objectives?
- 20. What are the significant transport requirements which result from the scale of development planned or specific proposals in the Plan? How will they be delivered?
- 21. What measures have the Council undertaken to ensure that a Local Transport Plan will be in place post 2015?
- 22. Is there a risk to delivery of other objectives of the CS where major schemes are not part of a current Local Transport Plan?

## Hereford Relief Road

- 23. Have other options been considered as part of the sustainability appraisal? Why is this the preferred approach?
- 24. What is the justification for the relief road?
- 25. What is the Highway Agency's view?
- 26. What is the likely cost of infrastructure of the relief road and link road? How will it be funded? Is this realistic and achievable?
- 27. Has transport modelling of all or sections of the relief road been undertaken? What is the timescale for delivery?

## Leominster southern link road

- 28. Have other options been considered as part of the sustainability appraisal? Why is this the preferred approach?
- 29. What is the justification for the link road?
- 30. What is the Highway Agency's view?
- 31. What is the likely cost of infrastructure of the relief road and link road? How will it be funded? Is this realistic and achievable?
- 32. Has transport modelling of the link road been undertaken?
- 33. What is the timescale for delivery?

## Employment

## Policy SS5

- 34. What is the basis for the overall amount of employment land planned (148Ha). Is the amount of employment land planned justified?
- 35. Is it of the right type and scale and in the right place to support sustainable growth?
- 36. What options were considered for the overall provision for employment land? When and how were these options considered? Why was the preferred option chosen ahead of other options and why were other options discounted? What evidence informed this decision and what was the role of sustainability appraisal in the process?

- 37. How does the amount of employment land planned relate to the planned growth in housing and associated jobs growth? Is it sufficient to deliver the level of growth planned?
- 38. Is the delivery of this amount of employment land realistic? How does it compare with past trends and take up rates? Would land be available?
- 39. What evidence is there that the retail hierarchy will promote competitive town centres and support viability and vitality?
- 40. How has the need for retail space and the type of space required been identified for the plan period?
- 41. Is there sufficient scope to provide a range of suitable sites to meet the scale and type of retail and other uses needed in the town centres?

## Environmental Quality/climate change

#### Policy SS6/SS7

42. Would the strategies be consistent with national policy and guidance?

#### Matter 3 – Place Shaping

#### Issue

Is the approach to place shaping justified, effective and consistent with national policy.

#### Questions

- 1. Is there sufficient detail in the plan for the spatial strategy to be implemented effectively with the right development in the right place supported by necessary infrastructure?
- 2. The Council rely on the production of further local plans and neighbourhood plans to identify and allocate land within the Hereford and other towns and villages. What is the timescale for the production and adoption of future LPs? What will the Council's approach be to development coming forward for sites (particularly larger scale development including urban extensions) within the identified areas prior to the adoption of more detailed plans?
- 3. Are the new employment sites too far away from the new housing?

## Matter 4 – Hereford

#### Issue

Is the approach towards Hereford justified, effective and consistent with national policy?

#### Questions

#### Policy HD1

The overall scale of housing/employment development

- 1. What is the basis for planning to accommodate in the region of 6,500 houses and 15 ha employment land in Hereford? Has a specific requirement for the City been identified in terms of the number of houses/employment land or a percentage of the total? What is the basis for this?
- 2. What options were considered for the amount of housing/employment land and proportion to be located at Hereford? How and why was the planned level chosen ahead of other potential options?

- 3. What is the potential capacity for housing in Hereford identified in the SHLAA? What is the potential capacity of the existing urban area?
- 4. How will the policies ensure a greater mix of properties and employment opportunities are achieved?
- 5. In overall terms is the scale of housing and employment land proposed for Hereford appropriate? Should it be increased or decreased and if so to what level? What would be the basis for such a change?
- 6. At what stage is the emerging Hereford Area Plan and what area will it cover? What is the timescale for adoption?
- 7. What evidence is there that the necessary waste and water supply, transport and social infrastructure can be delivered within the proposed timescale? How will it be funded? Has an assessment of viability of the development been undertaken taking into account these matters?

## Hereford Town Centre

## Policy HD2

- 8. Are the proposals for the City centre justified and can they be delivered? What is the status of the masterplan?
- 9. Is there sufficient land to accommodate proposed housing, employment, town centre uses? Where is the new urban village?
- 10. What is the potential capacity for housing in the City centre identified in the SHLAA?
- 11. What is the relationship between the new development and the Link Road? Who will pay for this? Is it necessary/deliverable and how and when will it be delivered?
- 12. Is policy HD2 consistent with the NPPF having regard to the sequential test?

## Movement

## Policy HD3

- 13. What evidence is the Council relying on to support their long term transport strategy for Hereford? How have the implications of the proposed development been tested on the existing and proposed infrastructure?
- 14. Are the Hereford relief road and the second river crossing necessary to enable development and/or strategic objectives within the City centre? How will they be funded and delivered?
- 15. When will the Hereford Transport Review take place? Could it come to different conclusions on the major infrastructure? What will the status be of this document?

## Hereford Urban Extensions

## Policies HD4, HD5, HD6

# NB. The questions are the same for each of the urban extensions. However, the urban extensions will be addressed separately at the hearing sessions.

- 16. What is the basis for planning to accommodate the number of houses in the urban extensions? Should the number be increased or decreased and if so to what level? What would be the basis for such a change?
- 17. Where there is an allocation of employment land, is it appropriate and justified?
- 18. How and why were the locations chosen ahead of other potential options? What other options were considered? Will they provide sustainable development?
- 19. What are the potential sources of housing/employment land? Is the land available? What is the potential capacity for housing in the urban extensions identified in the SHLAA?
- 20. How has the loss of agricultural land been taken into account?

- 21. Who will undertake the masterplan, what is the timescale and what status will it have?
- 22. What is the justification for park and ride schemes and other infrastructure such as transport hubs and the community neighbourhood centre? Who will deliver this and when?
- 23. Is development of the urban extensions dependent on the Hereford relief road? Who will fund it, when will it be delivered and by whom?
- 24. Is the plan flexible enough to cope, if the infrastructure is not forthcoming within a reasonable timscale?
- 25. Can the flood risk be overcome? Could it prevent development?

#### Matter 5 – Bromyard

#### Policies BY1, BY2

#### Questions

- 1. What is the basis for planning to accommodate in the region of 500 houses and 5 ha of employment land at Bromyard? Has a specific requirement for Bromyard been identified?
- 2. What options were considered apart from Hardwick Bank? How and why were the options chosen ahead of other potential options?
- 3. What evidence is there that land is available within Bromyard to deliver 250 houses and at Hardwick Bank to deliver 250 houses? What is the potential capacity for housing identified in the SHLAA? What is the potential capacity of the existing urban area?
- 4. What evidence is there that 5ha of land is available for employment?
- 5. Where is the justification for 40% affordable housing? How would this affect viability?
- 6. Is Hardwick Bank development dependent on infrastructure, if so how will it be delivered? Who will pay for it and would it affect viability?
- 7. Is development dependent on the provision of the park? How will it be delivered?

#### Matter 6 – Kington

## Policy KG1

#### Questions

- 1. What is the basis for planning to accommodate in the region of 200 houses in Kington? Has a specific requirement for Kington been identified?
- 2. What evidence is there that land is available within Kington to deliver 200 houses given the constraint sets out in paragraph 4.4.8 of the Core Strategy?
- 3. What is the potential capacity for housing in Kington identified in the SHLAA? What is the potential capacity of the existing urban area?
- 4. Where is the justification for 40% affordable housing? How would this affect viability?
- 5. Is the development dependent on infrastructure, if so how will it be delivered? Who will pay for it and would it affect viability?

## Matter 7 – Ledbury

## Policies LB1, LB2

## Questions

- 1. What is the basis for planning to accommodate in the region of 800 houses and 15 ha of employment land at Ledbury? Has a specific requirement for Ledbury been identified?
- 2. What options were considered for the urban extension apart from land north of the viaduct? How and why were the options chosen ahead of other potential options.
- 3. What evidence is there that land is available within Ledbury to deliver 175 houses? What is the potential capacity for housing in Ledbury identified in the SHLAA? What is the potential capacity of the existing urban area? Will green field sites be necessary?
- 4. What evidence is there that noise would not be a constraint on development of the urban extension?
- 5. Where is the justification for 40% affordable housing? How would this affect viability?
- 6. What evidence is there that 15ha of land is available for employment?
- 7. What options were considered for the employment land to the west of the town? How and why were the options chosen ahead of other potential options? What evidence is there that access would not be an overriding constraint?
- 8. Why is retail space not allocated when paragraph 4.5.15 indicates that there is a need for further convenience shopping floor space?
- 9. Is development dependent on infrastructure, if so how will it be delivered? Who will pay for it and would it affect viability?

#### Matter 8 – Leominster

## Policies LO1, LO2

#### Questions

- 1. What is the basis for planning to accommodate in the region of 2,300 houses in Leominster? Has a specific requirement for the town been identified in terms of the number of houses or a percentage of the County's total? What is the basis for this? Should it be increased or decreased and if so to what level? What would be the basis for such a change?
- 2. What are the potential sources of housing land? What is the potential capacity for housing in Leominster identified in the SHLAA?
- 3. What options were considered for the amount of housing and proportion to be located at Leominster? How and why was the planned level of housing chosen ahead of other potential options?
- 4. What options were considered for the urban extension? How and why was the location chosen and the number of houses (1500) determined ahead of other potential options? Would it deliver sustainable development?
- 5. Where is the justification for 25% affordable housing? Would this be sufficient to meet local affordable housing need?
- 6. How has the loss of agricultural land been taken into account?
- 7. Is the urban extension dependent on the provision of infrastructure, if so who will deliver it and when? How would this affect viability?

- 8. Is the plan sufficiently flexible to cope if the transport infrastructure is not forthcoming?
- 9. What is the basis for planning to accommodate in the region of 10 ha of employment land at Leominster? Has a specific requirement for Leominster been identified?
- 10. What options for employment land were considered? How and why were the options chosen ahead of other potential options?
- 11. Is provision for employment sufficient? Is there land available? Are additional land allocations required? Is it dependent on infrastructure and if so how will this be delivered? What is the impact on viability?
- 12. Should retail space be allocated?
- 13. What assessments have taken place to take into account the effects of the rivers Lugg and Arrow in terms of flooding?

#### Matter 9 – Ross-on-Wye

## Policy RW1

## Questions

- 1. What is the basis for planning to accommodate in the region of 900 houses and 10 hectares of employment at Ross-on-Wye? Has a specific requirement for Ross-on-Wye been identified?
- 2. What are the potential sources of housing land? What is the potential capacity for housing identified in the SHLAA?
- 3. What options were considered for the amount of housing and proportion to be located at Ross-on-Wye? How and why was the planned level of housing chosen ahead of other potential options?
- 4. What options were considered apart from Hildersley? How and why were the options chosen ahead of other options.
- 5. Where is the justification for 40% affordable housing? How would this affect viability?
- 6. What evidence is there that 10ha of land is available for employment?
- 7. Is the housing and employment development dependent on infrastructure, if so how will it be delivered? Who will pay for it and would it affect viability?

## Matter 10 – The Rural Area

## Policies RA1, RA2, RA3, RA4, RA5, RA6

#### Questions

- 1. Is the approach to rural areas consistent with national planning policy and does it take into account national Planning Practice Guidance?
- 2. Have the policies been positively prepared, are they effective and justified?

#### The overall scale of housing development in the Rural Area

- 3. What is the basis for planning to accommodate around 5,300 houses in the rural area? Has a specific requirement for the rural area been identified in terms of the number of houses or a percentage of the County's total? What is the basis for this?
- 4. What options were considered for the amount of housing and proportion of the County to be located in the rural area, and in each of the Housing Market Areas identified in RA1? How and why was the planned level of housing chosen ahead of other potential options?

- 5. What are the potential sources of housing land? Is there potential to meet the housing target identified in the SHLAA?
- 6. Will green field sites be needed to meet the overall target?
- 7. What is the basis for the list of villages and their capacity in Figures 4.20 and 4.21? How do they relate to the potential capacity and the SHLAA?
- 8. What evidence is there that the level of development would not be harmful to the natural and historic environment, including flood risk, biodiversity, landscape and character?
- 9. Policy RA2 is this policy too detailed? Does it conflict with RA1? Point 6 Is it reasonable to be so specific for market housing? Will it prevent development coming forward? What is the basis for the size criteria set out in points 7 and 8? Why should housing to meet local needs be restricted in size? How have you tested the viability/success of this approach? Planning obligations and conditions should meet certain tests on a case by case basis, is the last paragraph predetermining matters?

#### Countryside

- 10. How is the countryside defined? Is this clear?
- 11. Is the approach to development within the countryside appropriate and justified? Is it consistent with national policy and guidance?
- 12. Is the approach consistent with the need to accommodate the housing target?

## Agricultural, forestry and rural enterprise dwellings/re-use of rural buildings

- 13. Is the approach to development appropriate and justified? Is it consistent with national policy and guidance?
- 14. Have the policies been positively prepared? Are they too restrictive? Where is the evidence/what is the basis for the restrictions?
- 15. What is the basis for the size criteria in policy RA4?
- 16. See point 9) above regarding planning obligations and conditions
- 17. Is there a need to address equestrian related development?

#### Rural Economy

- 18. Is the approach to development appropriate and justified? Is it consistent with national policy and guidance?
- 19. Does it take a positive approach to sustainable new development? If so, should this be made clearer in the policy?
- 20. Would it provide encourage a prosperous rural economy?
- 21. Should it take into account agricultural development?

## Matter 11 – General Policies

The following questions should be answered for each policy.

- 1. Is the policy consistent with the National Planning Policy Framework and follow guidance contained in the Planning Practice Guidance (including the most recent revisions; for example, the planning obligation revision 28/11/2014)? Can this be demonstrated by reference to the relevant policy and guidance paragraphs?
- 2. Has the Policy been positively prepared and is it justified and effective?
- 3. How will the policy promote sustainable development?
- 4. Is it consistent with strategic and place shaping policies?

Examination of the Herefordshire Core Strategy

## Policies H1 and H2

- 5. What is the evidence base for the policy? Is it up to date?
- 6. What evidence is there that it will be sufficient to help meet affordable housing needs for the next five years (2014 2019) and in the long term?
- 7. How will the type and tenure be determined?
- 8. How has the effect on viability been considered?
- 9. Is the policy flexible enough to cope with differing economic circumstances throughout the life of the plan?

#### Policy H3

- 10. How will this policy be implemented? How would it guide development?
- 11. What will determine the range and mix of housing units that should be applied?
- 12. How will this assist in the provision of housing for an older population and meeting the needs of other sectors of the population?

#### Policy H4

- 13. Will the policy meet the needs of travellers? How does the Council know if there is any need for either transit plots for travelling show people? Is it compliant with the Planning Policy for Traveller Sites?
- 14. When will the DPD be adopted?
- 15. How has the Duty to Cooperate been complied with, in relation to cross boundary issues and travellers?
- 16. Is the policy too prescriptive?

## Policy SC1

SC1 – Do you need to specify how long existing facilities would be marketed for without success?

#### Policy OS1

- 17. Does this relate to public and private open space, including private gardens?
- 18. Where is the evidence that all development will create a need, in particular uses identified in points 2 and 3.
- 19. How would this policy affect viability?
- 20. The policy and justification should be clear that contributions can only be required where they meet the tests set out in the National Planning Policy Framework and CIL regulation 122.
- 21. How will the levels of contribution be determined?

#### Policy OS2

- 22. Does this need updating as PPG17 companion guide has been replaced with the Planning Practice Guidance?
- 23. Where is the evidence that major sports proposals should be at within or at the edge of Hereford?
- 24. Are they required within the Plan period? If so what consideration has been given to their location?
- 25. Where is the evidence that they could not be satisfactorily located elsewhere?

#### Policy OS3

26. Is this policy necessary as it repeats paragraph 74 of the National Planning Policy Framework. Would the last point be covered by Green Infrastructure policies?

Examination of the Herefordshire Core Strategy

#### Policy MT1

- 27. Where there are requirements for development such as parking standards, these should be in the Core Strategy as they have an effect on development which should be tested and clear from the outset.
- 28. What are the requirements set by the Local Transport Plan referred to in paragraph 5.1.57?

## Policies E1, E2, E3, E4, E5, E6

- 29. Matter 11, 1) 4) above would cover the main issues for these policies.
- 30. E6 what is the evidence base for the approach to primary and secondary frontages?

## Policies LD1, LD2, LD3, LD4

- 31. LD1 The first line of the policy refers to other objectives and assessments which are not set out in the plan, it is not clear whether they exist and the implications are therefore unknown. Should this line be moved to the explanatory text?
- 32. LD2 what is the basis for the wording of this policy? It is essential that it accords with relevant legislation, and national policy and guidance? Biodiversity and geodiversity action plans are referred to? What is their status? Have they been written? How would a reader know what they are and where they could be found? Are the sites of national and local importance shown on the policies map?
- 33. LD3 is the policy detailed enough to guide development? Where is the green infrastructure identified in detail rather than concept?
- 34. LD4 it is essential that the wording in the policy, explanatory text and throughout the plan accords with relevant legislation, and national policy and guidance. For example, what do you mean by affecting heritage assets? How is point 1 consistent with the wording in the National Planning Policy Framework? Paragraph 5.3.27 – what is meant by 'mitigatory or compensatory measures' and how does that relate to the legal and national policy tests?

#### Policy SD1, SD2, SD3, SD4

- 35. Are these policies consistent with the most up to date legislation, national policies and guidance?
- 36. Are there cross boundary issues and how have these been addressed in the duty to cooperate?
- 37. How has the effect of the policies on viability of development been tested, in particular SD4?
- 38. SD2 how would this policy be implemented? It is not clear whether it relates to renewable and low carbon energy generation? It refers to targets in another document 'UK Renewable Energy Strategy'. What are the relevant targets? What would the approach be for wind turbines and solar farms?
- 39. SD3 Point 1, where is the explanation of what this means? How would a reader know where to look for this information?
- 40. SD4 How have the implications of this policy been addressed for the strategic sites? How would it affect delivery?

## Matter 12 – Infrastructure Delivery Plan

- 41. What is the purpose of this policy?
- 42. Point 1, by tariff do you mean CIL? Is it in operation/been examined? If not, it cannot be referred to as if it exists. Is this point necessary?

- 43. Do Tariff contributions points a, b and c refer to CIL. If this has not been examined they should not be referred to.
- 44. Is the last paragraph necessary, is the list complete? Would it accord with national policy?
- 45. Does the IDP cost out all the items deemed necessary for the delivery of the urban extensions? If not is delivery uncertain?

#### Matter 13 – Monitoring

#### Issue

Would the Plan be able to be monitored effectively?

#### Questions

- 1) Is it clear how the Plan will be monitored? Should a monitoring framework be included in the Plan itself?
- 2) Is the monitoring set out in the document appropriate? How would it provide for effective and responsive monitoring of policies and proposals, particularly in the absence of specific site allocations?
- 3) Should there be more specific detail about timescales for the infrastructure and urban extensions within the Core Strategy?