

**Huntingdonshire Local Plan Examination  
Matters and Issues identified by the Inspector**

**Matter 1 – Procedural/legal requirements**

**Issue**

Whether the Council has complied with relevant procedural and legal requirements.

**Questions**

*Plan preparation*

- 1) Has the preparation of the Local Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
- 2) Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?
- 3) Has the preparation of the Local Plan complied with the Statement of Community Involvement?

*Sustainability Appraisal*

- 4) How has the Sustainability Appraisal (SA) informed the preparation of the Local Plan at each stage and how were options considered?
- 5) How has the SA been reported?
- 6) Has the methodology for the SA been appropriate? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?

*Habitats Regulations Assessment*

- 7) How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?
- 8) Was the approach in accordance with the recent judgement of the Court of Justice of the European Union (12 April 2018 - Case C-323/17) which ruled that it is not appropriate to take account of measures intended to avoid or reduce the harmful effects of a plan or project on a European site at the screening stage as part of the Habitats Regulations Assessment (HRA)?
- 9) What are the relevant designated sites considered?
- 10) What potential impacts of the Local Plan were considered? What were the conclusions of the HRA and how has it informed the preparation of the Local Plan?
- 11) What concerns have been raised and what is the Council's response to these? Specifically what is Natural England's position and the Council's response?
- 12) Is additional work required to address any of the above matters? Have there been further discussions with Natural England and if so what has been the outcome?

*Other matters*

- 13) Has the Council had regard to the specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
- 14) Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? Which?
- 15) How have issues of equality been addressed in the Local Plan?

## **Matter 2 – The duty to co-operate**

### **Issue**

Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan.

### **Questions**

#### *General*

- 1) What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?

#### *Overall housing provision*

- 2) Who has the Council engaged with in terms of overall housing provision and what form has this taken?
- 3) What are the inter-relationships with other authorities in terms of migration, commuting and housing markets?
- 4) How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN)?
- 5) What is the basis for updating the OAN for Huntingdonshire, rather than the wider Cambridge Sub Region Housing Market Area (HMA)? Is this an appropriate approach and how does it affect other authorities?
- 6) Are there issues of unmet need from within the wider HMA or other authorities? If so how are these being addressed?
- 7) Does the overall housing provision being planned in the Local Plan for Huntingdonshire have any implications for other authorities? If so, what are they and how are these being addressed?
- 8) What is the position of other authorities in the HMA and elsewhere in terms of the planned level of housing in Huntingdonshire? Have specific concerns been raised through duty to co-operate discussions or representations?
- 9) In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

#### *Jobs growth and employment land provision*

- 10) Who has the Council engaged with in terms of jobs growth and employment land provision and what form has this taken?
- 11) What are the inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?
- 12) How have these inter-relationships been taken into account in preparing the Local Plan in terms of jobs growth and employment land provision?
- 13) What are the wider implications of the Alconbury Enterprise Zone and how have these been taken into account?
- 14) In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of jobs growth and employment land provision?

#### *Transport infrastructure*

- 15) What are the strategic matters and particular issues?
- 16) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

- 17) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

*Water resources/waste water*

- 18) What are the strategic matters and particular issues?
- 19) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
- 20) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

*Flood risk*

- 21) What are the strategic matters and particular issues?
- 22) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
- 23) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

*Other strategic matters*

- 24) What are the other strategic matters and particular issues?
- 25) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
- 26) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

*Site allocations*

- 27) Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? If so how have they been addressed through co-operation?

## **Matter 3 – Development Strategy**

### **Issue**

Whether the Development Strategy is justified, effective and consistent with national policy.

### **Relevant policies – LP2-LP11**

**N.B. Detailed issues concerning the individual proposed site allocations are dealt with under Matters 6-11**

### **Questions**

#### *Overall*

- 1) What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?

#### *Spatial Planning Areas*

- 2) Are the Spatial Planning Areas appropriately defined, what is the basis for them?
- 3) Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?
- 4) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?
- 5) Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred? (detailed issues concerning these site allocations are dealt with under Matters 6 and 7)

#### *Key Service Centres*

- 6) Are the Key Service Centres appropriately defined, what is the basis for them?
- 7) Is the approach to the scale and type of development set out in Policies LP2 and LP8 justified?
- 8) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

#### *Local Service Centres*

- 9) Are the Local Service Centres appropriately defined, what is the basis for them?
- 10) Is the approach to the scale and type of development set out in Policies LP2 and LP9 justified?
- 11) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

#### *Small Settlements*

- 12) Are the Small Settlements appropriately defined, what is the basis for them?
- 13) Is the approach to the scale and type of development set out in Policies LP2 and LP10 justified?
- 14) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

#### *Countryside and definition of built up areas*

- 15) Is the approach to the countryside in Policy LP11 justified, effective and consistent with national policy?
- 16) Is the definition of built up areas appropriate and justified?

*Flood risk*

- 17) How has flood risk been taken into account in arriving at the strategy and distribution of growth?
- 18) What was the approach to the sequential and exception tests when considering the distribution of growth and site allocations? Has the sequential test been applied correctly? Is the approach justified and consistent with national policy? What concerns have been raised and what is the Council's response to these?
- 19) Is Policy LP5 justified, effective and consistent with national policy?

*Infrastructure*

- 20) What are the implications/requirements for transport infrastructure and how have these been taken into account? How will improvements be delivered and funded?
- 21) What are the implications for waste water infrastructure and capacity? What improvements are needed and how will these be put in place and funded? Is Policy LP6 justified, effective and consistent with national policy?
- 22) Is the approach to Green Infrastructure set out in Policy LP3 justified, effective and consistent with national policy?
- 23) What are the implications/requirements for other forms of infrastructure and how have these been taken into account? How will improvements be delivered and funded? Is Policy LP4 justified, effective and consistent with national policy?
- 24) Overall, what mechanisms will be in place to ensure essential/critical infrastructure will be provided and funded in a timely fashion? How will other organisations be involved in delivering infrastructure and what commitments to delivery/funding are there?

## **Matter 4 – Overall provision for housing**

### **Issue**

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing.

### **Relevant policies – LP1**

### **Questions**

- 1) Is it justified to identify an updated OAN for housing for Huntingdonshire rather than the wider HMA? What are the implications of this for other authorities in terms of plan preparation and meeting identified needs?
- 2) Was the methodology employed in the Huntingdonshire Objectively Assessed Housing Need Update of 2017 appropriate and does it provide a robust basis for establishing the OAN?
- 3) Is it justified in not making adjustments to the demographic led figure derived from the 2014 based household projections in terms of alternative migration trends, evidence on household formation rates or other factors?
- 4) How have economic/jobs growth forecasts and changes to working age population been taken into account? Is the 4% uplift to take account of this justified?
- 5) How have market signals been taken into account? What do they show? What is the basis for the 5% uplift? Is this appropriate or should it be higher? Is it appropriate to include the uplift for economic/jobs growth within this figure?
- 6) Given the scale of identified affordable housing need, should the OAN be increased to assist in delivering more? If so to what extent?
- 7) In overall terms is the OAN of 20,100 between 2011-2036 (804/yr) appropriate and justified? Is there a basis to arrive at an alternative figure and if so what?
- 8) Is the Local Plan justified in seeking to make provision to meet this OAN? Is there a case to make provision for a higher or lower number? How does it compare with past rates of delivery?
- 9) Is the approach of the Local Plan towards housing provision and jobs growth/employment land provision consistent?

**Matter 5 – Building a strong, competitive economy**

**Issue**

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy.

**Relevant policies – LP19-LP24**

**Questions**

*Employment land requirement and provision*

- 1) What is the overall need for employment land that has been identified? What is the evidence for this? What is the situation regarding existing commitments and the residual need for additional land allocations? What is the past trend in take up rates for employment land?
- 2) What are the inter-relationships with other authorities in terms of employment land provision and how have these been taken into account?
- 3) What provision does the Local Plan make for additional employment land through allocations? Is this an appropriate and justified amount? How has the Alconbury Enterprise Zone been taken into account in overall employment land provision?

*Established Employment Areas*

- 4) What is the basis for the list of Established Employment Areas? Is this justified?
- 5) Is the approach set out in Policy LP19 effective, particularly in terms of flexibility and is it justified and consistent with national policy?

*Rural economy and homes for rural workers*

- 6) Is the approach set out in Policy LP20 effective, justified and consistent with national policy? What is the basis for the specific limit on office floorspace and is this justified?
- 7) Is the approach set out in Policy LP21 effective, justified and consistent with national policy?

*Town centre vitality and viability*

- 8) What are the needs in terms of additional floorspace for retail and other main town centre uses? What is the evidence for this?
- 9) How will the Local Plan ensure that these needs are met? How much will be accommodated as part of site allocations?
- 10) What is the basis for the boundaries of Town Centres, Primary Shopping Areas and Primary Shopping Frontages? Are these justified?
- 11) Is the approach set out in Policy LP22 effective, justified and consistent with national policy? What is the basis for the threshold of 600m<sup>2</sup> for an impact assessment and is this justified?
- 12) Is the approach to main town centre uses in Key Service Centres, Local Service Centres and Small Settlements justified and does it provide sufficient clarity?

*Local services and community facilities and tourism and recreation*

- 13) Is the approach set out in Policy LP23 effective, justified and consistent with national policy?
- 14) Is the approach set out in Policy LP24 effective, justified and consistent with national policy?

**Matter 6 – Proposed site allocations – Huntingdon Spatial Planning Area**

**Issue**

Whether the proposed site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy.

**Relevant policies – SEL1.1, SEL1.2 and HU1-HU19**

**Questions**

Taking each of the following proposed site allocations individually:

*Strategic Expansion Location: Alconbury Weald*

- SEL1.1 – Former Alconbury Airfield and Grange Farm
- SEL1.2 – RAF Alconbury

*Huntingdon*

- HU1- Ermine Street
- HU2- Former Forensic Science Laboratory
- HU3- Former Police HQ site
- HU4- West of Railway, Brampton Road
- HU5- West of Edison Bell Way
- HU6- George Street
- HU7- Gas Depot, Mill Common
- HU8- California Road
- HU9- Main Street
- HU10 – Hinchingsbrooke Country Park Extension
- HU11- Huntingdon Racecourse

*Brampton*

- HU12- Dorling Way
- HU13- Brampton Park
- HU14- Brampton Park Golf Club Practice Ground
- HU15- Park View Garage

*Godmanchester*

- HU16- Tyrell's Marina
- HU17- RGE Engineering
- HU18- Wigmore Farm Buildings
- HU19- Bearscroft Farm

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale and type/mix of uses proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?



## Examination into the Huntingdonshire Local Plan

- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 7 – Proposed site allocations – St Neots Spatial Planning Area**

**Issue**

Whether the proposed site allocations for the St Neots Spatial Planning Area are justified, effective and consistent with national policy.

**Relevant policies – SEL2 and SN1-SN6**

**Questions**

Taking each of the following proposed site allocations individually:

*Strategic Expansion Location: St Neots East*

- SEL.2 – St Neots East

*St Neots*

- SN1- St Mary's Urban Village
- SN2- Loves Farm Reserved Site
- SN3- Cromwell Road North
- SN4- Cromwell Road Car Park
- SN5- Former Youth Centre, Priory Road

*Little Paxton*

- SN6- North of St James Road

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale and type/mix of uses proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 8 – Proposed site allocations – St Ives Spatial Planning Area**

**Issue**

Whether the proposed site allocations for the St Ives Spatial Planning Area are justified, effective and consistent with national policy.

**Relevant policies – SI1-SI4**

**Questions**

Taking each of the following proposed site allocations individually:

*St Ives*

- SI1- St Ives West
- SI2- St Ives Football Club
- SI3- Giffords Farm
- SI4- Former Car Showroom, London Road

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale and type/mix of uses proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 9 – Proposed site allocations – Ramsey Spatial Planning Area**

**Issue**

Whether the proposed site allocations for the Ramsey Spatial Planning Area are justified, effective and consistent with national policy.

**Relevant policies – RA1-RA8**

**Questions**

Taking each of the following proposed site allocations individually:

*Ramsey*

- RA1- Ramsey Gateway (High Lode)
  - RA2- Ramsey Gateway
  - RA3- West Station Yard and Northern Mill
  - RA4- Field Road
  - RA5- Whytefield Road
  - RA6- 94 Great Whyte
  - RA7- East of Valiant Square
  - RA8- Former RAF Upwood and Upwood Hill House
- 1) What is the background to the site allocation? How was it identified and which options were considered?
  - 2) What is the scale and type/mix of uses proposed?
  - 3) What is the basis for this and is it justified?
  - 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
  - 5) What are the benefits that the proposed development would bring?
  - 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
  - 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
  - 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
  - 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
  - 10) Is the site realistically viable and deliverable?
  - 11) What is the expected timescale and rate of development and is this realistic?
  - 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
  - 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 10 – Proposed site allocations – Key Service Centres**

**Issue**

Whether the proposed site allocations for the Key Service Centres are justified, effective and consistent with national policy.

**Relevant policies – BU1 and BU2, FS1-FS3, KB1-KB3, SY1 and SY2, SM1-SM6, WB1-WB5, YX1 and YX2**

**Questions**

Taking each of the following proposed site allocations individually:

*Buckden*

- BU1- East of Silver Street and South of A1
- BU2- Luck's Lane

*Fenstanton*

- FS1- Former Dairy Crest Factory
- FS2- Cambridge Road West
- FS3- Cambridge Road East

*Kimbolton*

- KB1- West of Station Road
- KB2- North of Station Road/Stowe Road
- KB3- South of Bicton Industrial Estate

*Sawtry*

- SY1- East of Glebe Farm
- SY2- South of Gidding Road

*Somersham*

- SM1- College Farm, West of Newlands Industrial Estate
- SM2- Newlands St Ives Road
- SM3- The Pasture
- SM4- Somersham Town Football Ground
- SM5- East of Robert Avenue
- SM6- North of the Bank

*Warboys*

- WB1- West of Ramsey Road
- WB2- Manor Farm Buildings
- WB3- South of Stirling Close
- WB4- South of Farrier's Way
- WB5- Extension to West of Station Road

*Yaxley*

- YX1- Askew's Lane
- YX2- Yax Pak

## Examination into the Huntingdonshire Local Plan

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale and type/mix of uses proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 11 – Proposed site allocations – Local Service Centres**

**Issue**

Whether the proposed site allocations for the Local Service Centres are justified, effective and consistent with national policy.

**Relevant policies – AL1, BL1 and BL2,**

**Questions**

Taking each of the following proposed site allocations individually:

*Alconbury*

- AL1- North of School Lane

*Bluntisham*

- BL1- West of Longacres
- BL2- North of 10 Station Road

*Great Staughton*

- GS1- South of 29 The Green
- GS2- Between 20 Cage Lane and Averyhill

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale of housing development proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

**N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.**

**Matter 12 – The supply and delivery of housing land**

**Issue**

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

**Questions**

- 1) What is the estimated total supply of new housing in the plan period 2011-2036 and how does this compare with the planned level of provision of 20,100?
- 2) What is the estimated total supply in the plan period from
  - a) completions since 2011
  - b) existing planning permissions
  - c) other commitments e.g. sites subject to S106
  - d) proposed site allocations
  - e) Other sources?
- 3) What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic?
- 4) Specifically, are the timescales and rates of delivery on large strategic sites realistic?
- 5) How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply not specifically identified? Can this be quantified?
- 6) 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?
- 7) How should the shortfall in delivery since 2011 be dealt with?
- 8) What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2011?
- 9) Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?
- 10) Is there a case for a staggered or phased housing requirement with a lower figure in the early years of the plan period to take account of the large strategic allocations? If so, what would be an appropriate phasing?
- 11) In overall terms would the Local Plan realistically deliver the number of houses required over the plan period?



## **Matter 13 – Strengthening communities**

### **Issue**

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards strengthening communities.

### **Relevant policies – LP25-LP31**

### **Questions**

#### *Affordable housing – Policy LP25*

- 1) What is the evidence in relation to the need for affordable housing? What does this show?
- 2) What are the trends in delivery of affordable housing and how has it been delivered? How is this likely to change in future?
- 3) What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show?
- 4) Is the target of 40% realistic and justified?
- 5) Is the threshold for the number of homes/floorspace justified?
- 6) Is the approach to the mix of tenures justified?
- 7) Is the policy sufficiently flexible, particularly in terms of the effect on viability and the potential for off-site contributions?
- 8) Are the policy requirements justified and is the policy effective and consistent with national policy?

#### *Housing mix – Policy LP26*

- 9) What is the evidence in relation to the requirements for accessible and adaptable homes in terms of need and viability? Is the approach justified?
- 10) Are the overall policy requirements justified and is the policy effective and consistent with national policy?

#### *Specialist housing – Policy LP27*

- 11) Is the policy justified, effective and consistent with national policy?
- 12) What is the situation regarding the Council's obligations under S8 of the 1985 Housing Act (as amended by the Housing and Planning Act 2016) in terms of the needs of people residing in or resorting to the District with respect to the provision of sites on which caravans can be stationed or places on inland waterways where houseboats can be moored? Have such needs been identified and what is the approach to meeting them?

#### *Gypsies, Travellers and Travelling Showpeople – Policy LP28*

- 13) What is the evidence in terms of need for additional provision? Was the methodology for the assessment appropriate and robust? What does it show?
- 14) Will the identified need (as defined in the PPTS) be met up to 2021 and 2036? How will this be achieved and is this an appropriate approach? Is there sufficient justification to not allocate sites?
- 15) Will there be an adequate supply of specific deliverable sites to provide 5 years' worth of sites?
- 16) How is the potential additional "unknown" need quantified and is the approach to this need justified?
- 17) What is the scale of need for people not meeting the definition in the PPTS? How will this be addressed? Is the approach justified? (see also Q12 above)
- 18) Are the criteria in Policy LP28 appropriate?
- 19) Is the overall approach to this issue and Policy LP28 justified, effective and consistent with national policy?

*Community planning proposals – Policy LP29*

- 20) Is it justified to allow community based development proposals as an exception to other policies?
- 21) Would the policy allow for housing as enabling development on sites where it would not otherwise be permitted? If so, is this justified?
- 22) Is the overall policy approach justified, effective and consistent with national policy?

*Rural exceptions housing – Policy LP30*

- 23) Is Policy LP30 and the approach to rural exceptions housing justified, effective and consistent with national policy?

*Health impact assessment – Policy LP31*

- 24) What is the basis for the different requirements for large scale major development and is this justified based on the definition of such development?
- 25) Is Policy LP31 justified, effective and consistent with national policy?

**Matter 14 – Requiring good design**

**Issue**

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards requiring good design.

**Relevant policies – LP12-LP18**

**Questions**

- 1) Taking each individually, are Policies LP12-LP18 justified, effective and consistent with national policy?
- 2) Is the requirement for the optional water efficiency standard in Policy LP13 justified by evidence? Has the impact on viability been taken into account?
- 3) What is the basis for the requirement for one cycle parking space per bedroom for all dwellings in Policy LP18? Is this justified?

**Matter 15 – Conserving and enhancing the environment**

**Issue**

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards conserving and enhancing the environment.

**Relevant policies – LP32-LP40**

**Questions**

- 1) Taking each individually, are Policies LP32-LP48 justified, effective and consistent with national policy?
- 2) Is the approach set out in Policy LP32 towards the potential effect of development on European sites appropriate and justified? Does the policy deal adequately with recreational pressure from additional housing and the need for mitigation? What is the Council's response to Natural England's concerns?
- 3) Is the requirement for an air quality assessment for large scale major development justified based on the definition set out?