

***Issue – Does part 2 of the Local Plan set out an effective framework for the delivery of allocations and the protection of designation sites, which is robust and in line with national policy?***

- a) Does the inclusion of site allocation wording in text boxes, rather than policies, have implications for the effectiveness and deliverability of part 2 of the Local Plan?

Yes I consider it particularly important for the delivery of sites that requirements for matters such as infrastructure, environmental protection etc are clearly specified within each site specific policy statement.

- b) Are the infrastructure and open space requirements of each site clearly set out in part 2 of the Plan? Is it clear what developers are expected to provide and when?

No further clarification of these matters is required.

- c) Are other site constraints and related mitigation measures clearly defined in part 2 of the Plan? Is there sufficient detail to clearly guide development and make it clear what will be permitted?

I consider that further clarification and detail are necessary.

Sub question i):- Should further information be provided on access points and local highway improvements?

Yes further information should be provided.

Sub Question ii):- where non developable areas and landscape/other buffer zones are cited should further detail be provided to clarify their location and extent?

Yes further detail should be provided as this is important in order to clarify site capacity and deliverability.

Sub question iii):- where sewers or power lines cross a site should potential mitigation be specified?

Yes again this is important in terms of clarifying net development capacity and is an important aspect of deliverability and suitability.

Sub question iv):- should part 2 of the Plan specify the protection and enhancement of Public Rights of Way on allocation sites, and the provision of links to adjoining PROWS and the core walking, cycling and riding network where appropriate?

Yes.

Sub question v):- should part 2 of the Plan specify mitigation measures relating to the historic environment, where relevant?

Yes but this needs to be a separate test where Green Belt review is involved and should not form the basis for the application of a function 4 test of Green Belt boundary reviews.

Sub question vi):- Should part 2 of the Plan specify the protection of key habitats/mature trees/hedgerows/boundary walls/other landscape features which are notable on a particular site?

Part 2 of the Plan could best deal with this by specifying the requirement for a site master plan for all or most allocation proposals which should incorporate the features to be protected in the landscape framework of the site and its immediate locality.

Sub question vii):- should constraints on or near allocations, including heritage assets, environmental designations, noise sources and hazardous installations be specifically named?

There is a case for each proposed site allocation in the Plan to be accompanied by a framework plan which identifies these constraints.

- d) Should part 2 of the Plan specify when master plans are required in association with an allocation site? Which sites would this apply to?

Yes and this should apply to the majority of allocation proposals and certainly those in excess of 5 hectares gross site area.

- e) Should the Plan specify where planning permission has already been granted, for reason of effectiveness?

Yes.

- f) What are the implications of a site being located within a High Risk Coal Referral Area?

This might in certain circumstances rule out the consideration of all or part of a proposed allocation.

- g) What approach has the Council taken to sites that fall within HSE zones, in the vicinity of hazardous installations? Is this approach justified and effective?

I await clarification from the Council. I would however comment that employment allocations are justifiable where the risk from a hazardous installation is limited and it is possible to incorporate suitable evacuation plans including routes, assembly points etc. The presence of a natural barrier is a further relevant consideration. Different considerations apply to proposed residential allocations.

- J) Are the allocations consistent with paragraph 100 in the NPPF which states that Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk and manage any residual risk, taking account of the impacts of climate change?

The Plan as drafted does not seem to adequately meet the requirements of this national policy.

- k) Has flood risk been factored into indicative site capacity estimates?

This is an important consideration which does not appear to have been factored in to site capacity assessments.

- l) Part 2 of the Plan specifies that employment sites are allocated for 'employment uses'. Does this cover use classes B1 to B8, or are other uses accepted? Is the Council's approach justified and clearly articulated?

No further clarification is required.

- m) On employment and mixed use sites, how have the indicative capacity floorspace figures been derived? Has a particular proportion of different b use classes been assumed?

This is an important issue in relation to the overall employment land supply and deliverability and suitability of proposed allocations and we await the Council's specific response.

- n) Are the proposed site allocation modifications relating to effects on the wider highway network necessary for reasons of soundness?

Yes

- q) Are there any implications for the site selection process, arising from the Council's re-assessment of RAG Green Belt edge ratings relating to Test 2d, as set out in Examination document ID17?

Yes there are significant implications for selected and rejected sites in terms of an appropriate re-assessment process.