

North East Derbyshire Local Plan Examination

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MAIN MATTERS, ISSUES AND QUESTIONS (MIQs)

These MIQs should be read in conjunction with the Inspector's Examination Briefing Note.

References in brackets () are to the document references in the Local Plan Examination Library which can be found on the Examination web site <http://www.ne-derbyshire.gov.uk/index.php/local-plan-examination>

Additional Examination Documents

The Council has provided a list of responses to the main issues raised and representations made at the Regulation 19 stage in addition to producing an Employment Topic Paper. You should refer to these when responding to the MIQs and there will be further consideration of the proposed changes at the relevant hearing sessions. The following documents are available on the Examination web site:

Council's responses to main issues raised in Regulation 19 representations (ED5)

Council's response to specific suggestions for changes to the Plan (ED6a, 6b, 6c, 6d & ED7)

Employment Topic Paper (ED8)

National Planning Policy Framework (NPPF)

On 24 July 2018 the Ministry of Housing, Communities and Local Government published a revised version of the NPPF. Paragraph 214 of the revised document states that the previous NPPF (2012) will apply for the purposes of examining plans where the plan was submitted for examination on or before the 24 January 2019. Therefore for the purposes of this examination, the North East Derbyshire Local Plan (NEDLP) will be assessed against the 2012 NPPF.

Rejected/Omission Sites

It is not part of my role to examine the soundness of rejected or alternative sites put forward by representors. Consequently, discussion at the hearing sessions and in response to the MIQs should focus on whether the proposed employment and housing site allocations in the submitted plan are sound.

Main Matter 6 deals with the soundness of the plan's approach to the Green Belt, including whether the exceptional circumstances exist to justify the release of sites from the Green Belt for new development. It is not part of my role to examine the soundness of rejected or alternative sites put forward by

representors. Consequently, discussion at the hearing and in hearing statements on the sites listed in Main Matter 6 should focus on whether the Council's approach as set out in the Green Belt Review (EB GB2a, GB2b & GB2ab) and explained in the Green Belt Topic Paper (EB GB3) is soundly based and justified by the evidence.

Abbreviations

AME – Areas of Multiple Sensitivity, DtC – Duty to Co-operate, IDP – Infrastructure Delivery Plan, NEDLP – North East Derbyshire Local Plan, NPPF – National Planning Policy Framework, OAN – Objective assessment of need, SA - Sustainability Appraisal, SHMA – Strategic Housing Market Assessment.

Main Matter 1 – Duty to Cooperate (DtC) and Other Legal Requirements

Issue – Whether the Council has complied with the DtC in the preparation of the plan

- 1.1 What are the relevant strategic matters in relation to the DtC?
(Defined as matters having a significant impact on at least two planning areas or on a county matter in a two tier area¹)
- 1.2 Has the Council maximised the effectiveness of the NEDLP by engaging constructively, actively and on an ongoing basis with the prescribed bodies on these relevant strategic matters during the preparation of the plan and what form has this taken?
- 1.3 What outcomes have resulted from the co-operation with the prescribed bodies on any relevant strategic matters and how have these informed the plan's policies?

Other Legal Requirements

- 1.4 Do the content and timescale for preparation of the NEDLP accord with the latest version of the Local Development Scheme (SD1)?
- 1.5 Has public consultation complied with the public consultation requirements in the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement (SD2a, b, c & d)?
- 1.6 Is it clear how the Sustainability Appraisal (SA) influenced the NEDLP strategy and policies and how mitigation measures have been dealt with?
- 1.7 Does the SA test the plan against reasonable alternatives in terms of the scale of employment and housing development and its broad distribution as set out in the spatial strategy? What alternatives were considered in the SA and is it clear why they were discounted?
- 1.8 How have the results of the Habitats Regulations Assessment (HRA) (EB ENV4a) influenced the NEDLP? Will the policies achieve the necessary mitigation to avoid an Adverse Effect on Integrity of the European protected sites as set out in the HRA?
- 1.9 Is the Council proposing any modifications to the plan in response to the Appropriate Assessment (EB ENV 4c)?
- 1.10 Taken as a whole, will the NEDLP policies be effective in mitigating and adapting to climate change, including supporting the transition to a low carbon future?

¹ S33A(4) of the Planning and Compulsory Purchase Act 2004

1.11 Has the preparation of the NEDLP complied with the Planning and Compulsory Purchase Act 2004 Part 2 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?

Main Matter 2 – Local Plan Vision and Objectives (Policy SS1)

Issue – Will the plan contribute to the achievement of sustainable development in the plan area?

- 2.1 Are the plan's objectives appropriate and justified by the evidence and will they help to deliver the vision for the plan area to 2034? Are the sub-area objectives soundly based and is it clear how they have informed the plan's policies?
- 2.2 Is the plan period 2014 - 2034 justified and is the start of the plan period clear?
- 2.3 Is Policy SS1 consistent with the NPPF and will it be effective in delivering sustainable development and informing proposals for new development?

Main Matter 3 – Objectively assessed need for employment and employment land requirement (Policy SS2)

Issue – Does the plan appropriately identify the objectively assessed quantitative and qualitative need for employment as required by the Planning Practice Guidance?

- 3.1 Does the plan area represent an appropriate functional economic area for the purposes of assessing the need for employment land?
- 3.2 What are the implications of the District's links with the wider functional economic area of the Sheffield City Region and the Derby, Derbyshire and Nottinghamshire Local Enterprise Partnership area for meeting employment needs in the plan area?
- 3.3 Is the assumption of 3000 jobs growth 2014 – 2035 under the Regeneration Scenario set out in the Employment Land Review report (EB EMP2) and Employment Land Review Update (EB EMP3) justified and robust? Why was this scenario selected in preference to the baseline job forecasts from Oxford Economics and Experian and how does it compare to historical rates of jobs growth?
- 3.4 Which sectors are expected to deliver an 'uplift' in jobs growth compared with baseline projections, why and is this based on robust evidence?
- 3.5 What interventions by public sector bodies and partners would be necessary to deliver the Regeneration Scenario and how likely are they to be achieved?
- 3.6 Does the plan's Regeneration Scenario have any implications for neighbouring authorities in terms of the labour market, commuting patterns and delivery of their economic strategies and local plans?
- 3.7 Would the jobs created be likely to meet the requirements of the District's working age population? Are there any identified skills shortages?

Issue – Is Policy SS2 which makes provision for 41 hectares of employment land soundly based?

- 3.8 How has the OAN for employment been translated into a requirement for floorspace and land? Are the assumptions in relation to the following factors clear and are they realistic and justified by the evidence:
 - Site coverage/plot ratio – 40%
 - Loss of employment land to other uses – 1 hectare per year
 - Margin for choice – 3.9 hectares over the plan period
 - Assumptions for job densities in the following sectors:
 - B1 (offices, research & development, light industry)
 - B2 (general industry)
 - B8 (storage and distribution)
- 3.9 Overall, will the plan meet the objectively assessed quantitative and qualitative need for employment land over the plan period?

Main Matter 4 – Objectively assessed need for housing and housing land requirement (Policy SS2)

Issue – Is the objectively assessed need for housing soundly based and supported by a robust and credible evidence base and is it consistent with national policy?

- 4.1 Does the plan area represent an appropriate basis for assessing housing need having regard to the North Derbyshire and Bassetlaw Housing Market Area as a whole?
- 4.2 Have appropriate adjustments been made to the 2014 based Sub-National Household Projections to arrive at a demographic based housing need figure for the District of 248 dwellings per year in the North Derbyshire and Bassetlaw Strategic Housing Market Area Objectively Assessed Need Update (SHMA OAN Update) (EB HOU4) and Considering NED OAN (EB HOU5) in particular:
 - The use of a 10 year migration scenario;
 - An uplift to household formation rates in the 25 – 34 and 35 – 44 age groups.
- 4.3 What would alternative assumptions and inputs for the demographic assessment of need indicate and is there any justification for these?
- 4.4 Is an uplift of 10% in the demographic based housing need an appropriate and justified response to the evidence on affordable housing need?
- 4.5 Is any adjustment to the demographic based housing need required to take account of market signals?
- 4.6 Have appropriate assumptions been made in in the SHMA OAN Update and Considering NED OAN in relation to the following factors for the purposes of assessing the number of resident workers necessary to support jobs growth over the plan period:
 - Economic activity rates by age and gender
 - Commuting ratio (number of workers per job)
 - Double jobbing (% of people in employment who have a second job)
 - Unemployment rate over the plan period
- 4.7 Having regard to the baseline objectively assessed need of 283 dwellings per year set out in the SHMA OAN Update (Table 92), is the requirement of 330 dwellings per year set out in Policy SS2 justified? If so, why?
- 4.8 Overall, is the objectively assessed need for housing aligned with the plan’s economic strategy?

Main Matter 5 – Spatial strategy, settlement hierarchy and the distribution of employment and housing land (Policies SS2, SS7, SS8, SS9 and SP1 – SP4)

Issue - Is the spatial strategy set out in Policy SS2 and overall distribution of housing development appropriate and justified by a robust and credible evidence base?

- 5.1 Were alternative options for the distribution of development considered during the plan's preparation and subject to SA and is it clear why the preferred Spatial Option 1 was selected and alternatives were discounted?
- 5.2 How has the supply of housing from existing planning permissions influenced the spatial strategy and distribution of development across the District?
- 5.3 Why was 50% selected as the 'threshold' for the distribution of new housing to Level 1 settlements? Were alternative figures tested through SA? Would a different figure be justified and if so, why?
- 5.4 Is the spatial distribution of housing development justified having regard to the distribution of strategic and other employment sites in the plan area?
- 5.5 Overall, will the spatial strategy set out in Policy SS2 and distribution of housing development set out in Table 4.3 contribute to the plan's vision and objectives for the District?

Issue - Is the proposed settlement hierarchy soundly based and justified by the evidence?

- 5.6 Is the Settlement Hierarchy Study Update (EB SS1) based on robust and relevant criteria and evidence?
- 5.7 Is it clear how the Update has informed the hierarchy and the designation of settlements within Levels 1, 2, 3 and 4 and does the proposed settlement hierarchy reflect the role and function of different settlements?
- 5.8 How do the strategic sites relate to the settlement hierarchy?
- 5.9 Having regard to paragraph 184 of the NPPF, is it clear which policies should be regarded as 'strategic policies' for the purpose of Neighbourhood Plans (NP)? Does the plan provide an appropriate framework for NPs and what is the up-to-date position with NP preparation in the District?

Issue – Are other settlement policies justified and soundly based?

- 5.10 What approach has been taken to identifying the settlement development limits and are they appropriately drawn on the Policies Maps? Are Policies SS7 and SS8 clear and have they been positively prepared?
- 5.11 Is Policy SS9 clear and has it been positively prepared?

5.13 How will Policies SP1 – SP4 support and enhance the roles of Dronfield, Clay Cross, Eckington and Killamarsh?

Main Matter 6 – Whether or not the approach to the Green Belt is soundly based and consistent with national policy (Policy SS10)

Issue - Do the exceptional circumstances exist to justify the release of land from the Green Belt and if so, what are they?

- 6.1 What are the exceptional circumstances, as required by the NPPF paragraphs 79 – 86, that justify the plan’s proposed revision of the boundaries of the Green Belt? Can the need for housing and employment development be accommodated on deliverable sites without releasing land from the Green Belt?
- 6.2 Have reasonable alternatives to Green Belt release been robustly assessed and what evidence underpins that assessment, including:
 - Non Green Belt land including capacity within existing settlement boundaries;
 - Brownfield sites (including those on the Brownfield Register) and under utilised land including surplus public sector land;
 - Optimising densities for new housing development; and
 - Land outside the Green Belt within adjoining authorities.
- 6.3 Is the Green Belt Review (EB GB2a, GB2b & GB2ab) based on a consistent, logical and clear methodology and is it clear how general areas were scored in relation to their contribution to Green Belt purposes?
- 6.4 How has the Sheffield City Region Green Belt Review Common Approach informed the process and outcomes of the Green Belt Review? Are the Green Belt boundaries contiguous with those in adjoining authorities and are there any cross boundary issues arising?
- 6.5 Has the approach to focus on the towns in level 1 of the settlement hierarchy for Green Belt release resulted in the loss of any Green Belt robustly fulfilling Green Belt purposes?
- 6.6 Why was a supplementary assessment to identify ‘top up’ sites undertaken and is that approach justified? Is it clear how resultant parcels were identified and assessed?
- 6.7 How will the plan enhance the beneficial use of the Green Belt as required by the NPPF?
- 6.8 Would the distribution of proposed Green Belt releases affect the purpose for which the North East Derbyshire Green Belt was designated and if so, how?
- 6.9 Is the extent of the Green Belt clearly defined using physical features that are readily recognisable and likely to be permanent?
- 6.10 Is the approach to amending Green Belt boundaries to release the following sites for development soundly based and is it consistent with the conclusions on their contribution to Green Belt purposes in the Green Belt Review (as set out in Table 3 of the Green Belt Topic Paper):

Site	Address	Green Belt Review Parcel Reference
Dronfield		
Site DR1	Land off Shakespeare Crescent and Sheffield Road	DRO/GB/042
Site DR2	Land north of Eckington Road, Coal Aston	DRO/GB/025
Site DR3	Land at Stubley Drive, Stubley Hollow	DRO/GB/081
Eckington		
Site EC1	Eckington South	ECK/GB/021 & ECK/GB/022
Killamarsh		
Site KL1	Land at Westhorpe	KIL/GB/0025
Site KL2	Land at Rotherham Road	KIL/GB/006

6.11 Is the extent of the Green Belt appropriately defined having regard to the other boundary changes proposed (as set out in Table 4 of the Green Belt Topic Paper):

Site	Address	Green Belt Review Parcel Reference
Cutthorpe	Land on B6050 adj Rosene Cottages	CUT/GB/003
Holymoorside	Land north of Loads Road	HOLY/GB/024
Killamarsh	Land at Rotherham Road	KIL/GB/006
	Adjacent Site KL1	KIL/GB/0025
Dronfield	Sports ground, Coal Aston	DRO/GB/025
	Land at Stubley Drive	DRO/GB/081

6.12 Should the plan identify safeguarded land to meet longer term development needs and what are the implications, if any, of not identifying safeguarded land?

Main Matter 7 – Whether or not the plan makes appropriate provision for new infrastructure to support the level of new development proposed (Policies ID1 – ID9)

- 7.1 Does the Infrastructure Study and Delivery Plan (IDP) (EB IV1) contain the full range of infrastructure necessary to support the development proposed in the plan?
- 7.2 Is Policy ID1 justified, effective and clear in terms of the contributions that will be sought towards strategic and local new and improved infrastructure necessary to support the development in the NEDLP? How will strategic and local infrastructure improvements be funded?

Issue - Will the plan be effective in reducing the need to travel and what effect will providing for new jobs and 6600 new homes have on the capacity and operation of the strategic and local road network?

- 7.3 Will Policy ID3 be effective in reducing the need to travel and encouraging sustainable modes of transport to reduce the impact of road travel and is it consistent with national policy?
- 7.4 Is Policy ID2 justified in terms of requiring contributions to all the schemes listed and should it include reference to the M1 junctions?
- 7.5 What is the likely effect of the proposed scale and distribution of development on the strategic and local highway network and traffic levels, in particular:
- M1 Junctions 29a & 30 and surrounding road network;
 - A61 corridor.
- 7.6 What other specific improvements to the highway network are proposed or will be required? Have the necessary highway improvements been identified in the plan and the IDP including timing/phasing where necessary?
- 7.7 How will the proposals for High Speed Rail HS2 affect the plan area? What other proposals are in the plan to increase travel by rail and will they be effective?
- 7.8 Do the IDP and the plan make adequate provision for primary and secondary education facilities to meet the needs arising from the housing growth proposed over the plan period? Should 'notified sites' be identified on the Policies Maps?
- 7.9 Have any necessary improvements to waste water treatment infrastructure been included in the IDP and the relevant site allocations where appropriate? Are the Yorkshire Water wastewater assessment results now available?
- 7.10 Have any additions to the greenways been identified in the IDP in conjunction with Derbyshire County Council and how will these be funded and delivered? Is Policy ID7 effective and positively prepared in relation to new greenways?

- 7.11 Is the approach in Policy ID8 to safeguard the original and western alternative route for the Chesterfield canal justified?
- 7.12 Is Policy ID9 based on robust evidence and are the designations on the Policies Maps justified? Are any modifications necessary for soundness?

Main Matter 8 - Whether or not the site selection processes for the employment and housing allocations are soundly based

Issue – Are the proposed employment allocations based on a robust assessment against relevant criteria?

- 8.1 Is the site selection process for the employment allocations soundly based, including sustainability appraisal and the testing of reasonable alternatives?
- 8.2 Is the site selection methodology based on an appropriate set of criteria? Are the reasons for selecting allocated sites and rejecting other clear and justified?

Issue - Are the proposed housing allocations based on a realistic density assumption and robust assessment against relevant criteria?

- 8.3 Is the general assumption of 30 dwellings per hectare set out in the Housing Topic Paper (EB HOU 7) and Housing Land Availability Assessment and Policy Assessment (EB HOU 6a) appropriate and based on robust evidence? Is that figure too high or too low and why?
- 8.4 Do the net developable area assumptions set out in the Housing Topic Paper and Housing Land Availability Assessment and Policy Assessment represent a realistic approach to site capacity and are they based on robust evidence? What approach has been taken where specific site constraints are known?
- 8.5 Is the site selection process for the housing allocations soundly based, including SA and the testing of reasonable alternatives?
- 8.6 Is the site selection methodology based on an appropriate set of criteria? Are the reasons for selecting allocated sites and rejecting other clear and justified?

Main Matter 9 – Whether or not the proposed strategic site and employment allocations are soundly based and deliverable in the plan period and whether other policies will support the economy (Policies SS3 – SS6, WC1 – WC7)

The Avenue, Wingerworth (Policy SS3)

- 9.1 Are the overall scale and mix of uses justified having regard to planning permissions for the site and are the site boundaries appropriate?
- 9.2 What is the role of the Avenue Area Strategic Framework in ensuring a comprehensive development and delivery of associated infrastructure?
- 9.3 Should any specific off-site highway measures necessary to mitigate the impact of the development on the local highway network including the A61 corridor be set out in Policy SS3? How would these be delivered?
- 9.4 Are the delivery rates and timescales for the employment, housing, community facilities and necessary infrastructure realistic and deliverable?
- 9.5 Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development, including foul drainage arrangements and Health Impact Assessments?

Former Biwaters site, Clay Cross (Policy SS4)

- 9.6 Are the overall scale and mix of uses in Policy SS4 justified and accurate having regard to planning permissions for the site and are the site boundaries appropriate? How would any shortfall in the delivery of employment land be addressed?
- 9.7 What is the role of the Design Framework in ensuring a comprehensive development and the delivery of associated infrastructure and are any additional delivery documents necessary?
- 9.8 Is the reference to rail access justified and is it clear what is being sought?
- 9.9 Are the delivery rates and timescales for the employment, housing, community facilities and necessary infrastructure realistic and deliverable?
- 9.10 Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development, including foul drainage arrangements and Health Impact Assessments?

Policy SS5 Markham Vale, Long Duckmanton

- 9.11 Is the overall scale of employment development in Policy SS5 clear having regard to planning permissions for the site?
- 9.12 Have cross boundary impacts been identified and appropriately addressed?

9.13 Is the site viable and would it be delivered within the plan period?

9.14 Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?

Coalite Priority Regeneration Area (Policy SS6)

9.15 Should Policy SS6 include an indication of the scale and mix of uses for the site?

9.16 How will the comprehensive development of all parts of the site within Bolsover and North East Derbyshire Districts be secured in a co-ordinated and consistent manner and have cross boundary impacts been appropriately identified and addressed?

9.17 How does HS2 affect the area of the site and the uses proposed within NED? Should any contribution to housing supply be identified?

9.18 Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?

9.19 Are the mitigation measures appropriate and justified including the requirement for full reclamation of the site prior to development commencing? Are any other mitigation measures necessary to achieve an acceptable form of development?

Dronfield Regeneration Area (Policy WC1)

9.20 Is the policy sufficiently clear about the scale and mix of uses that would be appropriate on the site?

9.21 Is the site viable and deliverable within the plan period?

9.22 Are any other mitigation measures including provision of infrastructure necessary to achieve an acceptable form of development?

Issue – Will other employment and economy policies support jobs and contribute to the economy in the plan area?

9.23 How have the existing employment sites set out in Policies WC2 and WC3 been reviewed?

9.24 What is the basis for seeking to protect the employment areas listed in Policy WC2 for the uses specified and is the approach justified?

9.25 Are the policy requirements for other employment areas set out in Policy WC3 based on robust evidence, justified and consistent with national policy? In particular, what is the basis of the requirement in criteria (b) to maximise opportunities for 'local people' and how would this be secured and delivered? Are the requirements set out in criteria 4(b) justified and deliverable?

9.26 Is the approach to protecting existing employment sites and development on employment land set out in Policy WC4 justified, effective and consistent with national guidance? In particular, what is the basis of the requirement in criteria (b) to maximise local employment opportunities and how would this be secured and delivered?

9.27 The following questions apply to Policies WC5 – WC7:

- a. Is the policy clear and justified and will it provide sufficient guidance for decision making?
- b. How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?
- c. Is the policy consistent with national policy?

Main Matter 10 - Whether or not the proposed housing allocations are soundly based and deliverable within the plan period (Policy LC1)

10.1 The following three questions apply to each of the sites proposed for housing as set out in the table below:

- a. Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?
- b. What is the likely impact of the proposed development on the following factors and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development:
 - ecology, biodiversity, green infrastructure and agricultural land;
 - landscape quality and character;
 - heritage assets;
 - strategic and local infrastructure including transport;
 - air and water quality, noise pollution, land stability and flood risk.
- c. Is the development proposed for each site deliverable in the timescales envisaged in the delivery trajectory?
- d. Are the development requirements for each site clear and deliverable and are any modifications necessary for soundness?

Housing Allocations

Location	Site Reference
Clay Cross	CC1, CC2, CC3, CC4
Dronfield	DR1, DR2, DR3
Eckington	EC1, EC2, EC3
Killamarsh	KL1, KL2, KL3, KL4, KL5, KL6
Calow	CA1, CA2
Grassmoor	GR1
Holmewood	HO1, HO2, HO3, HO4, HO5
Morton	MO1
North Wingfield	NW1, NW2
Pilsley	PI1
Shirland	SH1, SH2
Stonebroom	ST1, ST2
Tupton	TU1, TU2, TU3
Wingerworth	SS3, WW1, WW2

10.2 In addition for Sites DR1, DR2, DR3, EC1, KL1 & KL2:

- a. Do the exceptional circumstances exist to justify altering the Green Belt to release the site for housing? If so, what are they?
- b. What would be the effect of the proposed allocation on openness and the purposes of including land within the Green Belt?

Main Matter 11 – Whether or not the housing requirement will be delivered including meeting the need for different types of housing and whether a 5 year supply of land can be provided on adoption and throughout the plan period (Policies LC2, LC3, LC4, LC5, LC6, LC7)

Note – Assessment of need and provision for Gypsies and Travellers will be the subject of a separate hearing session (Policy LC8).

Issue – Will the plan provide an appropriate choice and mix of housing to meet the needs of different groups in the community?

11.1 Are the thresholds and targets for affordable housing in Policy LC2 justified and based on a robust assessment of economic viability? Having regard to the spatial distribution of new development and the location of High Value Areas on the Policies Map, will the policy be effective in meeting affordable housing needs?

11.2 Would the design requirements set out in Policy SDC12 have any impact on the viability of Policy LC2 and the delivery of affordable housing?

11.3 Is Policy LC3 clear and will it be effective? Should it include reference to regeneration led schemes and is the different approach to Green Belt/non Green Belt schemes justified?

11.4 Is Policy LC4 soundly based and flexible to meet changing needs and are the requirements for accessible and adaptable homes justified by the evidence?

Issue - Will the plan provide a 5 year supply of specific deliverable housing sites on adoption and is there a reasonable prospect that this will be maintained throughout the plan period?

Note - The Council has updated annual net completions 2014 – 2018 and projected completions for the relevant five year period 2018/19 to 2022/23 in the Five Year Housing Land Supply Statement 2018 (EB HOU8b).

11.5 What is the estimated supply in the plan period 2014 – 2035 from:

- Completions 2014 – 2018 (as at 31.3.18);
- Sites with planning permission for 10 or more dwellings (large sites);
- Sites with planning permission for less than 10 dwellings (small sites).

(The Council should provide up to date figures from the most recent monitoring information in its response to this question)

11.6 Is a 5% lapse rate for small sites justified and should a lapse rate be applied to large sites?

11.7 What is the residual amount of housing that needs to be delivered to meet the housing requirement of 6600 dwellings over the plan period?

11.8 Is the approach to discounting the following potential sources of supply for site allocations set out in the Housing Topic Paper justified? In particular:

- Sites in level 3 and 4 settlements;
- Sites near neighbouring Districts (site at Hasland 160 dwellings);
- Sites less than 10 dwellings (106 dwellings);
- Sites where completions will take place after the plan period (815 dwellings).

11.9 Are the assumptions about dwellings on windfall sites justified and are there any policy changes which could change the rate of delivery in the future compared with historical rates?

11.10 Does the proposed supply of 6621 dwellings against a requirement of 6600 dwellings incorporate a sufficient 'buffer' to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

11.11 Should an additional buffer of 5% or 20% be added to the five year housing land supply to significantly boost supply as required by the NPPF?

11.12 Based on a requirement of 330 dwellings per year, would the plan help to ensure a 5 year supply of deliverable sites over the plan period? Is the trajectory set out at Appendix B of the plan realistic and deliverable? Are the assumptions for start dates and rates of delivery on each site appropriate and justified?

(In responding to this question, the council should provide a worked table of the 5 year requirement based on 330 dwellings per year and the deliverable 5 year supply position against the 5 year requirement)

Issue – Are other housing policies soundly based?

11.13 The following questions apply to Policies LC5, LC6 & LC7:

- a. Is the policy clear and justified and will it provide sufficient guidance for decision making?
- b. How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?
- c. Is the policy consistent with national policy?

Main Matter 12 – Whether or not the plan will safeguard and enhance the landscape character, natural and historic environment in the plan area (Policies SS11 and SDC1 – 15)

Issue - Local Settlement Gaps (Policy SS11)

12.1 Is Policy SS11 necessary and justified by the evidence in the Local Settlement Gaps Study and Update (EB SS4 & EBSS4) and would other policies/designations be effective in safeguarding the form and character of settlements in the south of the District?

12.2 Is the local settlement gap designation on the Policies Maps consistent with the findings of documents EB SS3 & SS4?

(In responding to this question could the Council please include an update of the outstanding planning applications referenced in EB SS4)

Issue - Are other environment policies soundly based and justified by the evidence?

12.3 The following questions apply to Policies SDC1 – SDC15:

- a. Is the policy clear and will it provide sufficient guidance for decision making?
- b. Is it based on a robust evidence base?
- c. How will the policy be implemented and would it be flexible to respond to specific circumstances including viability?
- d. Is the policy positively prepared, justified by the evidence and consistent with national policy and will it be effective? Are any modifications necessary for soundness?

12.4 How have landscape character and other natural and historic environment designations been taken into account in identifying site allocations?

12.5 Is the spatial interpretation of Policy SDC3 clear on the Policies Map including the Areas of Multiple Sensitivity (AMEs)? How will the AMEs influence development proposals? How will the requirement for Landscape and Visual Impact Assessments (para 8.19) be delivered?

12.6 Should Policy SDC4 be modified to reflect the avoidance-mitigation-compensation hierarchy and should it provide stronger protection for Sites of Special Scientific Interest?

12.7 Would Policy SDC12 secure inclusive design and accessible environments as required by the NPPF? Is the reference to the 'Successful Places' Supplementary Planning Document within Policy SDC12 justified?

Main Matter 13 – Whether or not the plan would be viable and deliverable within the plan period and whether the arrangements for monitoring are robust

- 13.1 Would new employment, housing and other development be able to accommodate the plan's policy requirements having regard to viability and is this supported by the evidence in the Viability Study (EB IV2a)?
- 13.2 How would 'significant under delivery' of employment and housing land be defined in the monitoring table in chapter 10 of the plan?
- 13.3 Does the plan have sufficient flexibility to respond to changing circumstances? Should there be a policy or statement requiring an early review of the plan?

Main Matter 14 – Miscellaneous Matters

- 14.1 Are any modifications to the Policies Maps necessary?