

Barrow Borough Local Plan Examination

Inspector – Karen Ridge LLB (Hons) MTPL Solicitor
Programme Officer – Carolyn Woodend

Email: programme.officer@barrowbc.gov.uk Tel: 01229 876373

EXAMINATION HEARINGS MATTERS, ISSUES AND QUESTIONS (MIQs)

Introduction

The purpose of this independent examination of the Barrow Borough Local Plan (BBLP) is to determine whether the plan:

- has been prepared in accordance with the Duty to Co-operate and the legal and procedural requirements in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012; and
- is sound, as defined in paragraph 182 of the NPPF.

Hearings have been arranged to enable discussion of the matters, issues and questions (MIQs) for the examination based on my initial reading of the plan, the evidence base and the representations. The hearings will take place in two stages with the second stage following immediately after the first. Stage 1 of the hearings will focus on the legal and procedural matters and the key strategic issues. Stage 2 will deal with the remaining site allocations and policy matters.

I have set out below, the main issues and questions for the hearings. Matter 1 covers questions related to legal compliance and the duty to co-operate. Matters 2 and 3 set out the questions on the soundness of the plan in relation to key parts of the development strategy, including the overall development needs of the borough and the strategic allocations.

The hearings are due to commence on Tuesday 5 June 2018 and are programmed to run for 3 weeks until Thursday 28 June 2018. A timetable for matters to be discussed on each day is set out in the draft *Hearings Programme* which will be updated closer to the hearing dates.

The MIQs should also be read alongside the *Examination Guidance Note* which contains information on the hearings procedure, what you will need to do if you wish to participate and the format of any hearing statements.

Each of these documents can be found on the Examination webpage at: <https://www.barrowbc.gov.uk/residents/planning/planning-policy/examination-of-local-plan/examination-library/>

Abbreviations: DCLG – Department for Communities and Local Government; HMA – Housing Market Area; HRA – Habitat Regulations Assessment; LDS – Local Development Scheme; NPPF – National Planning Policy Framework; OAN – Objectively Assessed Housing Need; PPG – Planning Practice Guidance; BBLP – Barrow Borough Council Local Plan Publication Draft; SA – Sustainability Appraisal; SHMA – Strategic Housing Market Assessment; SNPP – Sub-National Population Projections

Matter 1 - Legal Compliance and Duty to Co-operate

Issue 1a: Duty to Co-operate

Questions

1. In preparing the BBLP, has the Council complied with the requirements of the Duty to Co-operate¹, with particular reference to:
 - a. The relevant strategic matters to which the duty applies as defined by S33A(4) of the Planning and Compulsory Purchase Act? Could the Council please indicate which matters it considers to be genuinely strategic?
 - b. The relevant local authorities and prescribed bodies as defined by S33A(1) in terms of co-operating on these strategic matters?
 - c. Whether the Council has engaged constructively, actively and on an ongoing basis with these organisations on the relevant strategic matters?
2. More particularly, in relation to overall housing provision:
 - a. Who has the Council engaged with in terms of overall housing provision and what form has this taken?
 - b. Is the treatment of Barrow as a single HMA appropriate and justified?
 - c. In overall terms has the Council engaged constructively, actively and on an ongoing basis in order to optimise 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?
3. More particularly, in relation to overall employment land provision:
 - a. Who has the Council engaged with in terms of overall employment land provision and what form has this taken?
 - b. What are the inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?
 - c. How have any inter-relationships been taken into account in preparing the Local Plan and arriving at a figure of 19ha of employment land?
 - d. In overall terms has the Council engaged constructively, actively and on an ongoing basis in order to optimise 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 employment land provision?

¹ Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)

4. For any other strategic matters requiring co-operation. For each matter please confirm:
 - a. What are the particular issues?
 - b. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
 - c. In overall terms has the Council engaged constructively? What has been the outcome of co-operation?
 - d. Are there any cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? Is so how have they been addressed through co-operation?

Issue 1b: Other legal and procedural requirements

Questions

1. In preparing the BBLP has consultation on the BBLP been undertaken in accordance with the Council's adopted Statement of Community Involvement (LP25) and the consultation requirements in the Regulations²?
2. Do the scope, content and timescale for the preparation of the BBLP accord with the Council's latest Local Development Scheme? Are there any obvious omissions, in terms of policies, from the submitted plan?
3. Has the formulation of the BBLP been based on a sound process of sustainability appraisal (SA)? In particular:
 - a. Has the assessment of sites, employment sites in particular, taken full account of the need to assess the significance of any heritage assets which may be affected by an allocation in accordance with paragraph 141 NPPF? Where is the evidence of this?

Please note that this question will more broadly be considered in Matter 10, heritage asset policies
 - b. Does the SA test the plan against reasonable alternatives, in terms of its overall strategy for growth and development, site allocations and policies?
 - c. Has the Council provided clear reasons for not selecting unreasonable alternatives?
 - d. Is it clear how the SA has influenced the BBLP strategy, policies and proposals and how mitigation measures have been taken account of?
 - e. Have the requirements for Strategic Environmental Assessment been met, including in respect of the cumulative impacts of the plan?
 - f. Have the Proposed Modifications been subject to SA?
4. Is the Plan legally compliant with respect to the Habitats Regulations³ and any requirement for appropriate assessment? How have the findings of the Habitats Regulations Assessment Screening Report influenced the BBLP?

² Regulations 18 and 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

³ Conservation of Habitats and Species Regulations 2010 (as amended)

5. Does the BBLP, taken as a whole, include policies designed to ensure that the development and use of land in Barrow borough contributes to the mitigation of, and adaptation to, climate change in accordance with Regulations⁴?
6. Is policy DS2 justified and effective and consistent with national policy?
7. Is the BBLP consistent with the Barrow Ports Area Action Plan?
8. Has the preparation of the BBLP complied with Part 2 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?

Matter 2-Development Strategy

(Deals with strategic aspects of Policies EC1, EC2, EC7, DS3, DS4 and H2, H4, H5)

Issue 2a: Overall Development Strategy

Questions

1. The Barrow Port Area Action Plan (BPAAP) was adopted by the Council in 2010 prior to publication of the NPPF and the National Policy Statement for Ports in 2012. The BPAAP forms part of the Development Plan and will remain part of the Development Plan in the event that the BBLP is found sound and proceeds to adoption. The BBLP does not identify the Port of Barrow on the Policies Map and does not have any policies in relation to the Port. Is the BBLP effective in terms of supporting the future growth of the Port by relying entirely upon the BPAAP? Should the Port of Barrow be identified on the Policies Map together with a policy?
2. Is policy EC1 positively prepared and effective? Would it support proposals for the port and port related uses? What about those parts of the Port estate (including the Walney Channel) not allocated in the BPAAP?
3. Has the overall development strategy of the BBLP been positively prepared, is it justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will it enable the delivery of sustainable development in accordance with national policy? In particular:
 - a. Is the strategy set out in Policy DS3 justified and consistent with national policy?
 - b. How were the Opportunity Areas in Policy DS4 identified? What criteria and site selection factors were used to identify such areas? Are the sites included and the boundaries used appropriate? (OPP3)
 - c. How does Policy DS4 deal with development opportunities in the identified Opportunity Areas? Is this justified and would it be effective?
 - d. Is policy EC7 (Energy Uses Opportunity Area) effective and justified? Is the modification (MAJ 1) to the Proposals Map correct and does it refer to the correct boundary?

⁴ Section 19(A) of the Planning and Compulsory Purchase Act 2004 (as amended)

- e. What is the basis for the overall development strategy contained in Policies DS3, DS4, H2, EC1 and EC2 of the BBLP, in terms of the broad location and spatial distribution of development between different settlements and parts of the borough?
 - f. In particular is the distribution of housing in policy H2 appropriate and justified having regard to the evidence and the ability of settlements to accommodate the proposed housing?
 - g. Is it justified as the most appropriate development strategy, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the broad location and spatial distribution of development and why were these discounted?
 - h. Is the reliance on large scale development through the Waterfront Business Park Strategic Employment Opportunity Area and the Port of Barrow justified as the most appropriate way of achieving sustainable development, with economic growth of the area promoting the need for further housing? If not, what are the alternatives?
 - i. Does the development strategy provide for the housing and employment land requirements of Barrow in a way which is reasonable to do so and consistent with achieving sustainable development?
 - j. Is there capacity in the local housing market and housebuilding industry to support the scale and rate of housing growth committed and planned in Barrow?
 - k. Is there alignment between the projected jobs growth forecast and the provision of housing in terms of delivery rates?
 - l. To what extent do the proposed allocations in Policy EC2 and the available supply at existing employment sites identified in Policy EC1 provide for the long term strategic and local employment land requirements of the borough and the wider sub-region, in terms of location, quality and quantity?
4. H4: Development Cordons.
 - Is this policy concerning residential development and the conversion of existing buildings for residential purposes appropriate having regard to any criteria which should be applied?
 - How were development boundaries identified and what factors were taken into account?
 - Are the development boundaries appropriate and justified?
 5. H5: Residential development in the open countryside. Is it sufficiently clear what development will be permitted and under what circumstances? Is the approach justified?

Matter 3-Overall Development Needs

(Covers Policies H1, H2, H7, H9, H10, EC1 and EC2)

Issue 3a: Housing Needs

Questions:

1. Has the BBLP has been positively prepared and is it justified, effective and consistent with national policy in relation to its proposal to provide for a minimum of 2261 additional dwellings between 2016/17 and 2030/31? In particular:
 - a. Do the 2016 SHMA Update (August 2016) and the SHMA Addendum 2017 (March 2017) provide a robust evidence base for OAN in the authority and is the methodology appropriate?
 - b. Are the demographic assumptions robust and justified? What assumptions in terms of population change, migration, household size, household formation rates and vacant/second homes rates, have been made and are these justified?
 - c. What is the evidence in terms of market signals? Is there any case to increase the housing need figure based on market signals?
 - d. Are the economic assumptions and employment forecasts robust and justified in relation to the range of job growth forecasts available? Do they provide a reliable basis for determining the economic-based housing need for Barrow?
 - e. The Housing Need and Supply Topic Paper sets out a revised OAN of 119 dwellings per annum? Is this figure appropriate and justified having regard to the latest evidence?
 - f. In determining its OAN the Council has adopted an employment-led zero change scenario. How is this justified having regard to the OBR assumptions on economic activity rates which underpinned the employment-led baseline forecast and which, after an initial increase predict a decline post 2020?
 - g. Is the OAN figure which the Topic Paper arrives at for the economic-led scenario appropriate? What would alternative assumptions for demographic change suggest and is there a justification to use these?
 - h. How does the figure of 119 net additional dwellings per year compare with the past trend of completions/net additional dwellings? Is it appropriate to make such a comparison? If so, is the figure of 119 dpa realistic when compared with past delivery trends?
 - i. Is there a realistic capacity/demand within the housing market for this level of net additional dwellings?
 - j. What is the situation regarding the past stock of planning permissions compared with needs? Has there been any constraints on supply which has affected delivery?
 - k. The Council has higher than average vacancy rates (twice the regional average and three times the national average). Should there be an empty homes strategy and an allowance for bringing vacant homes back into use?
 - l. It is unlikely that the identified affordable housing need would not be met over the plan period. Is this justified?

2. Is the 20% buffer justified? Is it appropriate and realistic to add the shortfall to the five year requirement having regard to past delivery rates and the strategic nature of some of the allocations?
3. Should the amount of housing proposed for Barrow (2,261 dwellings) be increased or decreased? If so to what level and on what basis? Should Policy H1 state that 2261 dwellings is a minimum?
4. Is the distribution of housing in policy H2 appropriate and justified having regard to the hierarchy of existing settlements? Has consideration been given to the cumulative effects of development and the ability of the existing infrastructure to cope with additional housing?
5. Is policy H9 justified and effective? Should a target minimum density be included?
6. Monitoring: Is policy H10 effective? It confirms that housing delivery will be monitored and '*if the number of houses built is not meeting the targets set, interventions will be sought*'. Should the policy include a trigger or minimum delivery targets which would indicate when interventions would be made? Should the nature and timescale of any intervention be specified?
7. Is policy H7 (windfall sites) effective? Criterion (a) refers to sites within or adjoining an existing urban area. Where is this defined?
8. Affordable Housing. Is the requirement for 10% of dwellings on sites or 10 units or over to be affordable justified having regard to the level of need? Should housing requirements be increased to reduce the gap between affordable housing need and provision?

Issue 3b: Employment Land

Questions:

1. Has the BBLP been positively prepared and is it justified, effective and consistent with national policy in relation to its proposal to provide a minimum of 19.4 hectares of employment land between 2016 and 2031? In particular:
 - a. What methodology was employed in the Employment Land Review and is this appropriate and justified?
 - b. What is the basis for the 19.4 ha of employment land planned for in table 5? Is it justified in the light of historic employment land take-up, jobs growth forecasts for the plan period and other additional factors?
 - c. How have job growth estimates been converted to floorspace and land requirements? What assumptions have been made in terms of employment sectors and jobs densities etc and are these justified?
 - d. How does the planned level of provision compare with past and recent take up rates for employment land in the borough of Borough?
 - e. Why was option 4: Job-Growth forecast (policy on) in the Employment Land Review chosen ahead of other options? Is the Local Enterprise Zone likely to prove effective in attracting firms to the area?

- f. How does employment land provision relate to the jobs growth estimates used to inform the overall level of housing provision proposed in the plan? What is the relationship between housing and employment land provision?
- In particular: What would 19.4 ha provide for in terms of jobs growth and how does this compare with the jobs growth estimated from the housing requirement of 119 dwellings per annum?
 - Are the approaches to employment land and housing requirements consistent? Specifically does the housing scenario (employment led zero change) correspond to the employment land scenario in option 4: Job-Growth forecast, policy-on?
- g. Should the requirement be set out within the text of policy EC2? How does the minimum requirement of 19.4 hectares relate to the allocations set out in policy EC2 totalling some 41.5 hectares? Is the level of allocations justified and effective?
2. In overall terms is the proposed employment land requirement of 19.4 hectares and the allocations of 41.5ha appropriate and justified?

Matter 4: Economic and Employment Matters

Issue 4a: Employment Land Allocations- Policy EC2

Questions

1. In overall terms how were the sites identified, what options were considered and what factors were taken into account in assessing options?
2. How have existing employment sites been reviewed? Are there sites which could be developed for other uses and if so what effect would this have on the overall supply of employment land?
3. Taking each site in turn:
 - What is the background to the site? How does it relate to existing/committed employment land, what is the planning status of the land?
 - What from or type of development is envisaged?
 - What would be the potential adverse impacts of development and how would these be mitigated?
 - Are there any physical or other constraints to development and if so, how would they be addressed?
 - What are the infrastructure requirements and how would these be provided for?
 - Would development be viable and realistically deliverable? How would this be achieved?
4. In all cases how would the development mitigate the impacts of additional traffic generation on the local roads and maximise the use of sustainable modes of travel?
5. Are the employment land policy requirements and design principles effective, justified and consistent with national policy? In particular is policy EC3 consistent with paragraph 123 of the NPPF?

Issue 4b: Other Economic and Employment Policies

Policies EC3-EC12

1. Is policy EC3 effective and in conformity with paragraph 123 NPPF? In particular does it recognise that development will often create some noise and does it refrain from putting unreasonable restrictions on established businesses due to proposed changes in nearby land uses?
2. What is the basis for seeking to protect existing sites referred to in policy EC4? Is the approach justified and consistent with national policy?
3. Are policies EC5, EC6, EC8-EC12 justified and effective and consistent with national policy?
4. How was the land making the Energy Uses Opportunity Area identified and are the boundaries correctly identified? Is policy EC7 effective and justified and sufficiently flexible?

Matter 5- Proposed Housing Site Allocations

Policy H3

Issue: Whether the proposed housing site allocations are justified, effective and consistent with national policy

Questions:

1. In overall terms how were the sites identified, what options were considered and what factors were taken into account in assessing options?
2. Are the following proposed housing allocations soundly-based; is there evidence that the development of each allocation is viable and deliverable? Have the boundaries to each site been correctly identified and are the indicative yields appropriate?
 - SHL001: Marina Village
 - REC 09: Field between Netherby Drive and Ormsgill Lane
 - REC54: Strawberry Ground
 - SHL082: Land East of Rakesmoor Lane
 - SHL068: Fields to rear of Croslands Park (Holly Croft)
 - SHL013b: Former Candleworks Site (South), Schneider Road
 - REC 34: Site at junction of Long Lane and Newton Road
 - REC 47: Land to West of Askam Road
 - REC 48: Land East of Askam Road
 - REC 02: Duke Street, Askam
 - REC 37: Land East of London Road, Lindal
3. In relation to all other housing allocations: are each of the allocations soundly-based; is there evidence that the development of each allocation is viable and deliverable?

N.B. In responding to the questions on site allocations the Council should identify and address specific concerns raised in representations (for example those representations regarding adverse impacts and constraints to development such as flooding concerns)

Matter 6: 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 2016-2031? How does this compare with the planned level of provision of 119 dwellings per annum (1785 in total)?
2. What is the estimated total supply in the plan period from:
 - Completions since 2016
 - Existing planning permissions
 - Other commitments eg sites subject to section 106 agreements
 - Windfalls on sites over 0.1 hectares
 - Windfalls on sites under 0.1 hectares
 - Proposed site allocations
3. What are the assumptions about the scale and timing of supply and annual rates of delivery from these sources? Are these realistic? Has there been any discounting of sites with planning permission other than Brady's Barrow and Buxton Street, Barrow? Are there other sites which should be discounted?
4. How have windfalls been defined and what evidence is there to support future estimates? Are the assumptions justified and appropriate?
5. What is the approach to the re-occupation of empty homes? Is this justified? Should an allowance be made for this element?
6. How has flexibility been provided in relation to the supply of housing? Are there other potential sources of supply not specifically identified? How would other sites within development boundaries be considered and could they add to the supply?
7. Has there been persistent under-delivery of housing? Should the buffer be 5% or 20% having regard to paragraph 47 of the NPPF?
8. How should any shortfall in delivery since 2016 be dealt with?
9. What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2016?
10. Would the Local Plan realistically provide for a five year housing land supply on adoption? Will a five year supply be maintained?
11. In overall terms would the BBLP realistically deliver the number of dwellings required over the plan period?

Matter 7: Housing policies

Issue

Whether the housing policies are justified, effective and consistent with national policy?

Relevant policies: H14

Questions

Policy H14: Affordable Housing

1. What is the evidence in relation to the need for affordable housing? What does this demonstrate?
2. What are the past trends in delivery of affordable housing and how it been delivered? Is this likely to change in the future?
3. What is the evidence in relation to the effects on scheme viability of delivery affordable housing as part of market housing schemes?
4. Should the policy be worded to reflect the fact that provision of affordable housing is achieved via the mechanism of agreement or unilateral undertaking? In other words, should the policy refer to 10% provision of affordable housing being sought?
5. Is the policy sufficiently flexible, not only in terms of taking into account viability considerations, but also in relation to any potential for off-site contributions?
6. Are the policy requirements justified and is the policy otherwise effective and consistent with national policy?

Policy H7: Windfalls

7. Is the policy effective and justified?
8. Where is the 'urban area' as referred to in criterion (a) defined?

Policy H9: Housing Density

9. Is the policy effective and justified?
10. Should a target minimum density be included?

Policy H11: Housing Mix

11. Is the policy effective and justified?
12. Would the policy deliver an appropriate mix of dwellings? In particular, is a more targeted approach, with an emphasis on delivering a greater proportion of family housing justified by the evidence and the nature of the existing housing stock?

Matter 8- Gypsy, Traveller and Travelling Showpeople's provision

Issue

Whether the approach to Gypsy, Traveller and Travelling Showpeople's provision is justified, effective and consistent with national policy in both the NPPF and Planning Policy for Traveller Sites

Relevant policy H15: Gypsy and Traveller Accommodation

Questions

1. How has the need for Gypsy, Traveller and Travelling Showpeople's accommodation been assessed? Is there any further evidence other than the Cumbria GTAA of November 2013?
2. What are the findings of this assessment?
3. In terms of the site allocation at Schneider Road:
 - Is there a need for a site allocation in principle? What would be the alternative?
 - What was the process for identifying the site at Schneider Road? How has the situation evolved during plan preparation? Which factors were taken into account in site selection, including the potential impact on heritage assets?
 - Is the site a true Gypsy and Traveller site in that it is restricted to occupation for Gypsies and Travellers?
 - What options were considered and why was this site chosen ahead of other sites? Is this site the most appropriate option?
 - In terms of site allocation, what form has public consultation taken?
4. Is the allocation of this site justified, effective and consistent with national policy? In particular, does the BBLP identify a supply of specific, developable sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15?
5. If the Council is to rely upon making provision for the first five years and thereafter reassessing demand, where is the commitment to do so and an expression of the intended timescale for review?
6. In terms of the assessment of unallocated sites:
 - Are the criteria within the policy appropriate and justified?
 - Is the policy consistent with national policy?

Matter 9- Retail

Issue

Whether the approach to retail provision is justified, effective and consistent with national policy in the NPPF

Relevant policies R1 to R19

Questions

1. What is the evidence in terms of a requirement for additional capacity for retail (both comparison and convenience goods) and other main town centre uses at points throughout the plan period? Is there a need for additional floorspace and if so, how and where is it intended to provide for this?
2. How have the boundaries for Barrow and Dalton Town Centres been defined and on what basis? Are the boundaries appropriate and justified?
3. What is the basis for the boundary of the Primary Shopping Area in Barrow and is it appropriate and justified?
4. What is the basis for the approach set out in Policy R3? Is it justified and consistent with national policy?
5. Is policy R4 effective and justified and consistent with national policy? In particular, policy R4 (as well as R10 and R11) refers to an edge of centre site being one within 300m of a Primary Shopping Area whereas the Policies Map has particular defined areas depicted.
6. What is the basis for the thresholds at which impact assessments will be required (Policies R8 and R9) and are they justified?
7. Is a sequential test for new office developments (Policy R11) effective and justified and consistent with national policy?
8. Is policy R13 clearly worded (criterion a) so as to be effective?
9. Is policy R15 effective and justified? Is it too restrictive?
10. Is policy R19 effective and justified? In particular are the neighbourhood shopping areas properly identifiable, with clear boundaries?

Matter 10: Other Policies

Issue

Whether other policies are justified, effective and consistent with national policy in the NPPF

Relevant policies

Heritage and Built Environment HE1-HE6

Climate Change and Pollution C1-C7

Natural Environment N2-N4

Green Infrastructure GI1- GI9

Healthy Communities HC8

In responding to the following questions the Council should deal with each policy in turn, address key points raised in representations and refer to suggested modifications to overcome issues of soundness

Questions

For all of the policies referred to above:

1. What is the basis for the policy? What is it seeking to achieve?
2. How does the policy relate to the evidence base? In particular is the evidence base for policy C6 sufficiently robust?
3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?
4. How will the policy be implemented? Is this clear?
5. Is the policy sufficiently flexible? Would it allow for specific circumstances to be taken into account?
6. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?
7. In overall terms, is the policy justified, effective and consistent with national policy?

In addition specifically in relation to historic environment policies

8. How has the potential impact on the significance of heritage assets (including their setting) been taken into account in identifying site allocations and is this appropriate? How will potential impact be addressed?

Cross refer to Matter 1, Issue 1b, question 3(a)

Specifically in relation to policy C6

9. What is the basis for the identification of the suitable areas for wind energy development? Is the evidence base robust? How does the approach sit with national guidance?

Specifically in relation to Green Infrastructure policies

10. What criteria have been used in the identification of green space and infrastructure? How have the various elements been categorised? Is the methodology robust and has it been consistently applied?
11. Is policy GI7 sufficiently clear to enable it to be effective?

Matter 11- Infrastructure Provision and Monitoring

Issue

Whether other policies are justified, effective and consistent with national policy in the NPPF

Relevant policies I1-I8

Questions

1. What are the likely impacts of the proposed scale and distribution of development on different aspects of infrastructure, including transport links? How have these been assessed?
2. How is it intended to address impacts on existing infrastructure and the need for new or improved infrastructure?
3. What specific improvements are proposed or will be required? What is the likely cost? How will they be brought forward and funded?
4. Is there a need to include any additional specific infrastructure projects in the Local Plan?

Monitoring

5. How would the implementation of the BBLP policies and proposals be achieved? What mechanisms are there to assist development sites to come forward/progress?
6. How would the implementation of the BBLP be monitored? Would this be effective? How would the results of monitoring be acted upon? For example, what would trigger a review of the Local Plan?