Chesterfield Local Plan Examination

Chesterfield Borough Council Response to
Inspectors’ Matters, Issues and Questions

16th September 2019

Matter 8 – Infrastructure Policies, Viability and monitoring the Plan
Matter 8 – Infrastructure Policies, Viability and monitoring the Plan

Issue 1: Whether the Plan makes adequate provision for infrastructure to support sustainable growth and provision and protection of community facilities [Policies LP11, LP12, LP16, LP24 and Appendix A]

8.1 LP11 criterion b) refers to all reasonable efforts to let or sell the unit for the current use over a 12-month period. This type of policy requirement often includes the need the marketing exercise to be continuous, in this case over a 12-month period that includes advertisement for let or sale at a realistic price. Similar guidance to this is provided in PPG Paragraph: 001 Reference ID: 66-001-20190722. Would inclusion of these additional details assist in ensuring that the policy is effective?

Yes. A main modification will be prepared to that effect.

8.2 Policy LP16 criterion a) requires that where appropriate development should not harm the character or function of the Green Belt; is this terminology consistent with the NPPF? Moreover, does the Council intend to define what development comprises inappropriate development in the Green Belt? If not, should the policy cross reference to the Green Belt requirements set by the NPPF?

A modification will be prepared to the policy which replaces criteria a) with a) Not conflict with the aims and purposes of the Green Belt (as set out in the NPPF) b) Not harm the character and function of the Green Wedges and Strategic Gaps

8.3 Is the expectation that development will make a contribution through obligations towards the establishment, enhancement and on-going management of green infrastructure justified and consistent with national policy?

All residential development is CIL-liable and will contribute to green infrastructure through the CIL liability. Non-residential development will be expected to make a contribution through planning obligations where this is necessary and appropriate.

8.4 Policy LP16 seeks to protect “Local Green Spaces”. Are these Local Green Spaces of the status envisaged by NPPF paras 99-101? Are there any existing or proposed Local Green Spaces in the Borough?

There are no Local Green Spaces as envisaged by the NPPF existing or proposed in the borough and a modification removing this reference will be prepared.
**8.5 Is it appropriate and justified that Policy LP16 criterion a) treats the Green Belt, Green Wedge and Strategic Gaps on an equal basis?**

Yes. In the context of 'Green Infrastructure', it is appropriate and justified to have a criteria that seeks to prevent harm to the character and function of strategic green infrastructure in the form of Green Belt, Green Wedges and Strategic Gaps. The Green Belt is subject to additional protection through national policy and other policies of the plan.

**8.6 The last sentence of Policy LP16 states that ‘the Council will require with planning applications the submission of ecological surveys and assessments of the biodiversity and geological value of sites proportionate to the nature and scale of the development’. A similar requirement is set out in the last sentence of Policy LP17. Is the intention of these policies that all development proposals would have to provide this information? If so, is this justified and in accordance with PPG Paragraph: 018 Reference ID: 8-018-20190721? If not, are these aspects of the policies justified and effective?**

The policy requirement could be removed from LP16 and retained in LP17 without compromising the effectiveness of the Plan and a modification will be prepared on that basis. Furthermore, the modification will more fully reflect the guidance in the PPG Paragraph: 018 Reference ID: 8-018-20190721.

**8.7 Are there any updates in relation to the detailed design work being prepared for the proposed Hollis Lane Link Road as cited in Paragraph 9.17?**

Yes. Work on the planning, programming and design of the Hollis Lane Link Road has been continuing through a joint County /Borough Council officer working group. A planning application has been prepared and submitted to Derbyshire County Council for phase one of the Hollis Lane Link Road.

Detailed design of Phase 1 of the Hollis Lane Link Road is due for completion during 2019, with a programme for Phase 2 to be determined following a review of junction options on completion in early 2020 of an updated traffic model.

**8.8 With reference to the Infrastructure Study & Delivery Plan – 2019 (document KSD6), is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan’s growth would be sustainable? The Study and Delivery Plan post-dates the pre-submission plan that was consulted on. Accordingly, does it generate a need for any main modifications to ensure the Plan is justified and effective?**
The Local Plan identifies the level of growth which is planned, locations, and timescales for delivery. The Infrastructure Study & Delivery Plan seeks to assess existing infrastructure provision and capacity, and the additional infrastructure needed to support the planned growth in the Local Plan. The Infrastructure Study & Delivery Plan has been updated at each key stage of the Local Plan, recognising that infrastructure provision is dynamic. This does not imply that the Local Plan is out of date and requiring further modifications, but rather that the IS&DP continually requires to be monitored and updated in response to changes in infrastructure capacity in partnership with key infrastructure providers.

8.9 What are the critical infrastructure inter-dependencies necessary to ensure sustainable growth over the plan period? Is the Infrastructure Study & Delivery Plan’s categorization of ‘critical’, ‘necessary’ and ‘complementary’ infrastructure justified? How does it relate to the Derbyshire Infrastructure Investment Plan and the Sheffield City Region Infrastructure Investment Plan (SCRIIP)?

To determine vital infrastructure and prioritise its delivery, this Study and Plan has identified all the main types and items of infrastructure that are likely to be needed to support the sustainable development of the Borough as set out in the Local Plan. However, it is clear that some types of infrastructure are more critical than others over the short term, while others are more necessary over the plan period. In addition, others are required to complement development in order to maximise the benefits of sustainable growth for local communities. In preparing the Infrastructure Study & Delivery Plan therefore, an assessment was made based on the type of infrastructure and its role in supporting planned growth, about whether it was assessed as 'critical' i.e. infrastructure that must be delivered in order for sustainable growth to take place without causing severe adverse impacts to local communities in the short term, or 'necessary' i.e. infrastructure that must be delivered in order for sustainable growth to take place without causing severe adverse impacts to local communities over the plan period, or 'complementary' i.e. Infrastructure that is required to maximise the benefits of sustainable growth for local communities. The Infrastructure Study & Delivery Plan was prepared in the context of cross-boundary co-operation, including through the North Derbyshire Infrastructure Planning Group alongside Derbyshire County Council, North East Derbyshire District Council and Bolsover District Council, and this approach has deliberately been consistent with that followed in neighbouring authorities to achieve a degree of cross boundary consistency. The Infrastructure Study & Delivery Plan has been updated at each key stage of the Local Plan preparation process. This has enabled the Borough Council to engage with Sheffield City Region and Derbyshire County Council in the preparation of the Derbyshire Infrastructure Investment Plan and the Sheffield City Region Infrastructure Investment Plan (SCRIIP), ensuring that the key projects identified in the Infrastructure Study & Delivery Plan were also identified and in
other key infrastructure planning processes. This will provide a platform for future funding bids for key infrastructure.

8.10  Are those infrastructure elements identified as ‘critical’ (must be delivered for sustainable growth to avoid severe adverse impacts) justified? Is there a reasonable prospect of funding and/or land resources to enable ‘critical’ infrastructure to be in place in a timely fashion to support growth? Is the study justified in highlighting that there are no significant infrastructure ‘show stoppers’ to the delivery of the plan’s growth proposals?

The IDP identifies the infrastructure necessary to deliver the plan strategy. For those items of infrastructure identified as critical or necessary the IDP sets out the most up to date available information on funding and delivery. Where there are uncertainties over funding, including for large scale strategic sites, these have been programmed towards the end of the plan period in the delivery trajectory.

The County Council is content that (particularly in the light of Government’s support for Major Road Network and Large Local Major highway programmes) that in the foreseeable future it should be possible to ensure delivery of ‘critical’ infrastructure.

8.11  The DTC Statement (KSD5) references the Derbyshire Infrastructure Plan (DIP) led by Derbyshire County Council in response to Core Strategy 2013 but states that further testing (transport modelling) will be needed for growth proposed in this Local Plan. Does the Plan appropriately reflect known strategic priority transport projects (committed and identified)? Is the plan based on an adequate understanding of the transport impacts of the proposals in the Plan or is additional work (modelling) required to understand the transport (and associated air quality) impacts on the networks arising from the plan’s proposals?

The County Council regards the Plan as tested adequately given the tools available to do so. An updated model, validated to Department for Transport guidance standards, will be available for more detailed testing of impacts (including air quality) from early 2020 that can be used in testing specific schemes through the Development Management process.

8.12  Does the 2011/2012 Transport Study remain a justified baseline for this Local Plan? Is it appropriate that updated strategic transport modelling outputs for North Derbyshire will not be available until 2020?

The transport statement of common ground (SCG2) clearly sets out that Derbyshire County Council, as Highways Authority, considers the 2011 Traffic Impact Study to be an appropriate baseline for Local Plan preparation (section 3, ‘Agreed Matters’).
8.13 Does work undertaken since the 2012 Joint Cumulative Transport Study provide sufficient assurance on transport infrastructure and capacity both within the Borough and in adjoining authorities (notably the A616/A619 Treble Bob roundabout) to support growth in the short-medium term? Is this reflected in the statements of common ground with Derbyshire County Council highways and the North Derbyshire M1/Treble Bob roundabout parties?

The current position is reflected in the statements of common ground with Derbyshire County Council highways (SCG2) and the North Derbyshire M1/Treble Bob roundabout parties (SCG8).

8.14 The evidence indicates the need for capacity improvements at Junction 30 of the M1 (off-slips in the AM and PM peaks) being a shared issue for various Local Plans. The statement of common ground with Highways England advises that the impacts from the emerging new Chesterfield Borough Local Plan on the M1 are less certain at this stage but will be subject to future transport evidence base work which will be shared with Highways England, Derbyshire County Council and neighbouring authorities as they develop. Is this a justified and effective approach? Is growth in Chesterfield expected to provide a proportional contribution to any junction 30 improvement scheme? Is this appropriately reflected in infrastructure planning for Chesterfield?

At present Highways England has not identified any necessary works to junction 30 arising from the level of growth identified in the plan. Should improvements subsequently prove necessary, CIL provides a mechanism to secure contributions from development.

8.15 What are the outcomes of the A61 Growth Corridor Strategy and has it yielded funding or project delivery to support the Plan’s proposals? Is there any update on the implementation of >£16million funding for site enabling/capacity improvements along the A61 (SOCG with DCC Highways), the Hollis Lane Link Road, the Whittingham Moor roundabout improvements and key cycle network improvements along the A61?

"The A61 Growth Corridor Strategy is a programme of four inter-related projects that bring forward/accelerate growth and regeneration at major development sites and/or improve highway network reliability and resilience along the A61 corridor in northern Derbyshire. It is intended to support 1,238 jobs and 1,091 houses, with additional wider benefits there are a number of wider benefits from this programme of work including:

* Improved opportunities for residents and commuters to access safe, sustainable travel (reliable bus services, walking and cycling)
* Improvements to public health – reduced congestion, more active travel
* Wider environmental benefits from reduced congestion
* The four inter-related projects consist of:
• 21st Century Transport Corridor (network reliability and resilience)
• Provision of traffic signals and improved co-ordination at key nodes along the A61 corridor, including signal control upgrades at existing junctions, to bring these within an Urban Traffic Control (UTC) system.
• Pedestrian and vehicle improvements to the A61/St Augustine’s Road junction
• Provision of traffic signals at the two terminus junctions on Sheepbridge Lane, improving traffic flows in the vicinity of this major business park and positively impacting upon the performance of the A61 at Sheepbridge.
• Provision of real-time bus passenger information along A61 and in town centre to improve reliability and encourage more sustainable travel for residents and commuters (now implemented)
• Provision of real-time car park guidance to aid network resilience and support economic growth

Chesterfield Station Masterplan
• Provision of the Hollis Lane Link Road to enable the whole sale reconfiguration of land around Chesterfield Rail Station and delivery of the East Midlands HS2 Growth Strategy, bringing forward approximately 438 homes and 440 jobs
• Improvements to wider highway network including signalisation of the adjacent Lordsmill Street roundabout, enabling it to operate under the UTC system as part of the wider programme of works.

Avenue Site (Southern Access) (situated south of Chesterfield Borough, in North East Derbyshire District)
Provision of roundabout on the A61 and spur road to bring forward development land and provide the second principle access to the Avenue mixed development sits: estimated 650 homes, 798 jobs;

Standard Gauge for Sustainable Travel
• Provision of high-standard, off-road, multi-user routes to encourage more sustainable travel for residents and commuters including: improvements along Derby Road, cycle routes from Avenue to Chesterfield, new multi-user bridge across Rother Washlands, cycle route from Sheepbridge to Whittington Moor, development of Wayfinding Strategy.

8.16 The Infrastructure Delivery Plan 2019 identifies the CSRR as critical infrastructure but with a degree of overlap (superseding) with the proposed Northern Loop Road – Phase 2. Can this be clarified – does the Northern Loop Road Phase 2 remain a valid scheme to include in Policy LP24?

Provision of the Staveley Northern Loop Road is a condition of the planning permission for Markham Vale (policy S55). Although there is in principle agreement with Derbyshire
County Council (as both highways authority and landowner/developer of Markham Vale) that this will be superseded by the CSRR, it is advisable that it remain safeguarded until such time as the relevant condition is formally removed by an application for vary the planning permission, to avoid creating a potential conflict with the planning permission.

8.17 **Is there a reasonable prospect of longer-term capacity being secured at Staveley Waste Water Treatment Works to support strategic growth in this Plan? Does capacity at Staveley WWTW inhibit early significant delivery at Staveley and Rother Valley SS5 site and does it affect delivery trajectories at other sites recognising the Infrastructure Study refers to a 1000 dwelling headroom at the works, possibly shared with growth in other authorities?**

Yorkshire Water have provided the following position statement (11.9.19) in response to this question: "We will be undertaking engineering investigation at Staveley WWTW in 2020/2021 which is year 1 of Asset Management plan 7 (AMP7) that commences in April 2020. The investigation will identify what new plant etc is required to serve predicted growth in the WWTW catchment (whether in Chesterfield or neighbouring LPAs) based on the Local Plan allocations. The construction of any required additional treatment facility at the site will then be completed before 2025. The solution will also ensure that the WWTW continues to comply with any updated water quality standards applicable at the time."

8.18 **Is Policy LP12 a sound approach to securing infrastructure delivery through contributions from development where mitigation is required?**

Policy LP12 seeks to ensure that developer contributions, either through CIL or S.106 agreements will be used to mitigate any identified impacts from new development and ensure that necessary infrastructure is funded and provided as and when it is required. However, since LP12 was drafted, the government have published amendments to the Community Infrastructure Regulations. The amendments delete Regulation 123 Lists and require their replacement by Infrastructure Funding Statements. This may require a proposed modification to delete the reference in to Regulation 123 list in Policy LP12

8.19 **What is the reasonable extent of any funding gap for infrastructure that is critical or necessary to enable the plan’s proposals to be delivered?**

The CIL charging scheme demonstrated an infrastructure funding gap (as required by the CIL Regulations) which CIL will contribute to addressing. The Council will continue to draw down infrastructure funding from a range of sources throughout the plan period in order to deliver key infrastructure identified in the IDP and support planned development.
8.20 **Is the Plan’s approach to HS2 justified? Has consultation on an HS2 informed masterplan for the station area been undertaken or is programmed?**

The plan’s approach to HS2 is justified. Delivery of phase 2b is now expected to be between 2035 and 2040, beyond period of the plan submitted (2033) and the revision proposed (2035). The only elements of HS2 expected to be delivered in the plan period are construction of the IMD and its rail access. The issues that will be addressed by the station area masterplan (limited access to the railway station, poor connections to the town centre and the desire to reduce traffic on St Mary’s Gate) pre-date the announcement of an HS2 stop in Chesterfield and will still need to be addressed in the interim (and, indeed, in the event that a decision is made not to proceed with HS2 phase 2b at the end of the year). Consultation on the Station Masterplan is now expected to occur at the end of 2019 and the emerging proposals have been informed by ongoing discussions with HS2 through the East Midlands and Chesterfield and Staveley Delivery Boards.

8.21 **Does the Plan provide a clear, effective and soundly based strategy to promote sustainable transportation, manage the demand for travel and provide transport infrastructure which is appropriate to the Borough?**

Yes, subject to the main modification ref 8.22.

8.22 **Is Policy LP23 justified, effective and consistent with national policy?**

In order that the policy reflects guidance in the NPPF, the council will prepare a main modification incorporating additional criteria relating to cycle parking standards and environmental gains.

8.23 **Is the Plan justified in not identifying or safeguarding former railway land for future use a rail infrastructure and/or as walking and cycling trails? Is there cross-boundary consistency on proposed multi-user trails, particularly in the Markham Vale area? Are such trails protected and supported by Policy LP16? Do existing and proposed trails need to be identified and protected on the Policies Map?**

An amendment to the policies map will be prepared to show the Multi-user trails in the borough and to add an additional criteria to policy LP16 “h) Protect the Multi-User Trails network as shown on the Policies Map.”

**Issue 3: Plan-wide viability**
8.24 **Taking account of the evidence in the Whole Plan Viability Assessment 2018 (WPVA) (document KSD7), would the requirements of the policies of the Plan put the viability of its implementation at serious risk?**

In line with the results of the WPVA, the Emerging Local Plan sets out the contributions expected from development and their delivery has been comprehensively examined. On this basis, the Local Plan policy requirements are realistic and their impact will not undermine the delivery of the plan. The WPVA is informed by a consultation exercise with the Council and a range of other stakeholders with interests in the Borough. The consultation took the form of a questionnaire and a consultation event held on 14th July 2017 and the responses received from that exercise were fed into our assumptions.

8.25 **Is the viability study justified in identifying the four value areas?**

The setting of policy rates on a geographic basis is, of necessity, a broad brush exercise because it seeks to strike a balance between an accurate reflection of property values, which vary at a very fine geographic grain – often varying from street to street – and a policy which is wieldy enough to be of practical use. The analysis which underpins the mapping exercise is set out in paragraphs 6.31 et seq of the viability report. It consists of a series of overlapping exercises which consider, the value of all transactions by postcode sector, the mapping of higher and lower value transactions across the borough and a detailed consideration of values per square metre achieved by new build developments. The results of these exercises were then overlaid with the previous policy map, whose boundaries are defined by wards.

In general, the finding of the exercises undertaken by the viability study were found to be a good match with the older policy albeit that we found evidence of a patch of lower value development to the south of Chesterfield town centre. The policy area boundaries have been adjusted accordingly.

8.26 **Has the assessment of viability made reasonable assumptions on the following: (i) threshold land values (ii) site typologies tested (iii) build costs for the Borough and allowances for economies of scale on larger sites; (iv) the cost of optional technical standards including adaptable and accessible dwellings (Policy LP5) and water consumption (Policy LP14) (v) the ability of major developments to support a Percent for Art (Policy LP21) (vi) cost of electric vehicle charging points on qualifying developments (Policy LP23)**

In terms of the Threshold Land Value assumptions, the WPVA is supported by a Land Valuation Report, as undertaken by Valuation Audit Services (VAS). VAS undertook an analysis of transactions in the land market which inform the Threshold Land Values applied to the WPVA. This evidence base then includes a detailed assessment of the
likely level of landowner return, ensuring that a reasonable range of Threshold Land Value is applied to the Local Plan viability evidence base.

In terms of the site typologies tested, the PPG advises that, ‘Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence.’ (Paragraph: 003 Reference ID: 10-003-20180724). In terms of general residential development, the WPVA adopts a site typology approach, testing a range of sites at values which reflect those across the Borough.

It is fully acknowledged that the PPG also recommends, ‘in some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.’ (Paragraph: 003 - Reference ID: 10-003-20180724). On this basis, the WPVA includes more detailed assessments of both the Chesterfield Waterside and Staveley & Rother Valley Corridor strategic development sites.

In terms of average build costs for the Borough, the WPVA applies costs based upon the Build Cost Information Service (BCIS). The BCIS costs are provided by the Royal Chartered Institute of Chartered Surveyors (RICS). This approach is fully in keeping with the PPG which recommends the use of, ‘build costs based on appropriate data, for example that of the Building Cost Information Service’. (Paragraph: 012 - Reference ID: 10-012-20180724).

The BCIS dataset contains a number of price studies, which allow practitioners to make allowance for a number of different factors. The best known of these is the location factor adjustment. The Location factor for Derbyshire at the time of the study was 1.12. We found such a high location factor surprising. On closer examination, we found it to be an issue across all areas in the East Midlands which is the only region to combine above average construction costs with below average property values. Moreover, we also found that the region’s status as a high cost area was recent. Historically, the location factors had reduced build costs but, in late 2017, the location factors had spiked suddenly and by as much as 20% relative to other regions. This led us to make contact with BCIS themselves – who informed us that the spike in the allowances arose from a very small number of submissions which appeared to have had a disproportionate impact on their algorithms. In light of this, and information we had seen relating to site specific appraisals within Derbyshire, we took the decision to apply the long-term location factor (0.97) rather than the rate published at the time of the study.

As regards the economies of scale adjustment, this relates directly to another of the tender price studies published by BCIS – the contract sum adjustment. BCIS reviews the
average size of the contracts underlying submissions to the database and have noted that larger contracts tend to achieve slightly better value for money than smaller ones. This is, of course, what one would expect to see and it is entirely in line with their decision to publish a “one-off” rate for developments of 1-3 units (which is far higher than the “estate housing” rate used here. The advantage of the contract sum study is that it quantifies the scale of the effect, which have been reflected in the modelling. Further discussion of both factors can be found at paragraph 6.80 of the study et seq.

In terms of an appropriate allowance for adaptable and accessible standards, Paragraph 6.107 of the WPVA Report notes that, ‘The Housing Standards Review M4(2): Cost Impact Report by EC Harris (September 2014: table 45 on page 38) recommends an additional cost of just over £500 per unit for terraced, semi-detached, and detached units. This development cost has then been applied to 10% of the residential units tested, as part of the ‘Baseline’ viability tests presented as part of this paper.’ The above text is not fully correct. The ‘Baseline’ viability assumption assumes an average cost of £500 per unit, assuming the application of the M4(2) standard to 25% of the proposed dwellings. The cost of the M4 (2) Accessible and Adaptable Standard is then fully allowed for, as part of the viability tests undertaken.

In terms of the M4(3) standard, this is dealt with at Paragraphs 6.108 to 6.118 of the WPVA. If demand is found to exist for affordable homes to an accessible wheelchair specification the additional cost of conversion from M4(2) to M4(3) would need to be met by the Registered Provider (RP). The Council has confirmed that it has a stock of funds available for this purpose. In the event that demand exists, but funds for conversion are not available, it is anticipated that the overall provision of affordable housing will be adjusted in order to ensure that the developer’s contribution remains cost neutral. In view of this, we do not consider it necessary to make a specific cost allowance to cover the impact of this policy. This is also on the basis that Policy LP5 allows for a degree of flexibility, particularly where it notes that the implementation of the standard is ‘subject to site suitability’.

In terms of an appropriate allowance for the Per Cent for Art policy, the WPVA doesn’t include a cost allowance for this policy. As drafted, the policy allows for a degree of flexibility, setting out that the Council will ‘seek to negotiate’ the per cent for art policy. On this basis, this policy is not a mandatory requirement. The Council may then seek this contribution from appropriate sites, particularly those with a more favourable viability profile which deliver a sufficient scheme surplus. If a sufficient scheme surplus isn’t achieved, the percent for art may then not be required.

In terms of an appropriate allowance for water consumption, the standard of water conservation set out in the current Building Regs is 125l / per person/ per day. The 2015
Edition (with 2016 amendments) of the HM Government document, ‘Sanitation, Hot Water Safety and Water Efficiency’ notes that the tighter standard can be achieved through what is called the “fittings approach”. Where the fittings approach is used, the water consumption of the fittings provided must not exceed certain limits, as set out in the above document. The more up to date ‘Water Conservation Report’ (Department for Environment, Food and Rural Affairs/ December 2018) comments that, ‘In many cases efficiency can be achieved at little cost to developers. Requiring all developers to build to the lower standard of 110 litres per person per day would only cost a maximum of £9 additional per dwelling’. The above cost is sourced from the EC Harris Housing Standards Review: Cost Impact Report which identifies the costs of a number of current and proposed housing standards, including water efficiency. On the basis that the estimated cost per dwelling to achieve the 110 litre per person, per day standard is a relatively low amount per unit, this standard is unlikely to have a significant impact upon development viability and is not assumed as a development cost as part of the WPVA.

In relation to vehicle charging points, please see the separate response to Paragraph 7.21. Given the relatively modest sums involved it is considered unlikely that installation of an Electric Vehicle Charging Point will significantly impact the viability of a development scheme. The policy is written in a way that allows the charging points to be applied, if appropriate. The cost of installing EVCP varies, albeit may be less where appropriate provision has been made for the future installation of the EVCP. It is anticipated that the charging units themselves could be purchased by householders, (potential from the developers) at the time of sale..

8.27 Does the WPVA strike the right balance for this Plan, based on the evidence, in moderating affordable housing (up to 20% in Policy LP5) to improve viability for CIL contributions?

The viability evidence informs the quantum of affordable housing required. The results of the WPVA indicate that the currently adopted 30% affordable housing target (Policy CS11 – 2013 Core Strategy) is no longer deliverable in the current market, allowing for national standards and the impact of other proposed Local Plan policies. On the basis of the WPVA findings, the Emerging Local Plan proposes lower affordable housing targets on a ‘sliding scale’, varying between 0% and 20% across four identified ‘Value Points’. This downward adjustment is then applied, in order to ensure that the Emerging Plan remains deliverable, whilst also improving viability and the “headroom” for CIL contributions.

The Council is proposing a main modification to Policy LP5. This modification will apply the above mentioned sliding scale of affordable housing targets, ensuring lower targets, particularly in the identified lower value areas of the Borough. This modification is discussed further, as part of our response to Paragraph 8.28.
8.28 Does the evidence in the WPVA show that, in line with NPPF paragraph 57, the significant majority of allocations in the Plan are viable with an up to 20% affordable housing contribution, CIL and likely site-specific planning obligations thus significantly reducing the need for costly and potentially protracted individual site appraisals at the planning application stage?

In line with our response to the Inspector’s question regarding Policy LP5 (Paragraph 3.16), the Council is proposing a main modification to the policy text. In line with the results of the WPVA, this modification to LP5 will also ensure that the affordable housing targets are applied at a sliding scale, varying between 0% and 20% at different sub-areas of the Borough, labelled as ‘Value Points’ by the WPVA. Section 8 of the WPVA then presents the relevant policy map (Page 154) which clearly identifies the above mentioned ‘Value Points’. On this basis, the following differential affordable housing targets are proposed by the WPVA:

- Value Point 1: 0% Affordable Housing;
- Value Point 2: 10% Affordable Housing;
- Value Point 3: 20% Affordable Housing; and
- Value Point 4: 20% Affordable Housing.

On the basis of the above modified affordable housing targets, the significant majority of development in the proposed Plan is deliverable. This includes a reasonable allowance for CIL and other likely site-specific planning obligations. The revised NPPF (Paragraph 57) and PPG on development viability place increased emphasis upon Local Plan viability assessments and the importance of setting realistic targets. On the basis of the WPVA results, the Council has taken a pragmatic approach regarding developer contributions. This has lead to a not insignificant reduction in the current 30% affordable housing target which is applied to the entire Borough. This reduction is more profound in the lower value areas of the Borough (Value Point 1 and 2), where affordable housing targets of 0% and 10% apply. In line with the Local Plan viability evidence, the above adjusted affordable housing targets are then applied, in order to maintain viability in the current market. This adjustment is also applied, in order to also meet the PPG requirement to significantly reduce the need for viability appraisals at the planning application stage.

Issue 4: Monitoring

8.29 Does the Plan contain an adequate framework for monitoring the implementation of its policies? Could document KSD10 (Monitoring and Review Framework) be included as part of the plan through a main modification?
Considered that the framework is adequate for the monitoring of policy implementation. Agree the framework could be added to the plan as an appendix.

**8.30 The Sustainability Appraisal sets out a number of monitoring mechanisms and indicators which could be used to assess environmental effects of the Plan through the Annual Monitoring Report process. Is this reflected in the monitoring framework in KSD10?**

The indicators that have been identified through the SA are set out in Appendix E of the January 2019 report. The Council acknowledges the potential benefits of embedding indicators for the SA within monitoring associated with the Local Plan, so as to avoid duplication of effort. The Council intends to propose a main modification that will integrate indicators suggested in the SA into the monitoring framework for the Local Plan.