

# **Mid Suffolk Core Strategy Focused Review (CSFR) Examination**

## **Main issues and questions**

*Notes - The Inspector is also examining the Stowmarket Area Action Plan (SAAP), and she has already received representations relevant to many of these questions. There are core documents that are also relevant to both examinations. She will therefore refer to those documents and representations in her examination. Any further representations received in relation to outstanding consultation exercises will be taken into account in the examination.*

*In answering her questions, cross reference may be made to any representation or document that has already been provided to her in either examination, so long as it is properly identified. Earlier representations should however be reviewed to check their continued relevance. The Council may wish to complete or refer to Planning Advisory Service Compatibility Self Assessment Checklist in its answers.*

*The Inspector will give equal weight to written representations and to those made verbally at the hearing sessions. Main issues identified in the Inspector's letter to the Council dated 18 April 2012 have been highlighted in bold.*

### **1.0 Legal Compliance**

1.1 Has the CSFR been prepared in accordance with the Local Development Scheme?

1.2 Is the CSFR in general conformity with the Statement of Community Involvement and public consultation requirements?

1.3 Has the CSFR been subject to an adequate sustainability appraisal? Is the note prepared on behalf of the Council adequate?

1.4 Is the Appropriate Assessment adequate? Has sufficient regard has been had to biodiversity?

1.5 Has the CSFR had regard to the Sustainable Community Strategy for the area?

1.6 Does the CSFR comply with the 2004 Act and the 2012 Regulations?

1.7 Does the CSFR contain an adequate list of superseded saved polices?

1.8 Have all the procedural requirements for publicity and consultation been met?

**1.9 Is the CSFR in general conformity with the Regional Strategy (RS)?**

**1.10 Does the CSFR comply with the policies of the Framework and does the CSFR adequately address the national presumption in favour of sustainable development?**

1.11 Has the CSFR had regard to national policy? Is the CSFR consistent with the National Planning Policy Framework (NPPF or the Framework)? Are any modifications necessary to make the CSFR sound as a result of the publication of that document?

1.12 Does the CSFR sufficiently reflect the presumption in favour of sustainable development that Local Plans are expected to follow? Should the CSFR be modified to include the model sustainability policy? How would that affect policy FC1?

1.13 Whether the plan period is sufficiently clear throughout the CSFR, how that complies with NPPF and how it fits within the context of the original document. Whether there are any implications for cross-boundary working.

## **2.0 Duty to co-operate**

**Whether the Council has complied with the duty to co-operate. This includes in relation to planning issues that cross administrative boundaries, particularly those that relate to strategic priorities, for the mutual benefit of neighbouring authorities.**

2.1 Under s20(5)(c) of the 2004 Act, whether the Council has complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.

2.2 The Council should seek to demonstrate with relevant meeting notes and dates of meetings cross-boundary working/ inter party working and agreement achieved.

2.3 The relevance of developments, joint studies or development plans in neighbouring authorities should be brought to the Inspector's attention if relevant to the content and soundness of the CSFR. This should be in sufficient detail for the Inspector to understand their relevance.

2.4 Is there any joint committee, memorandum of understanding or a jointly prepared strategy that represents an agreed position between authorities on any matter covered by the CSFR?

2.5 Is the plan based on effective joint working on cross-boundary strategic priorities? Does the plan meet any unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development?

### **3.0 Employment**

**Whether the amount and distribution of economic development is appropriate, justified, sustainable and supported by a sound evidence base.**

3.1 Stowmarket is not identified as a growth area. How does the CSFR fit with the development plans of surrounding areas? Do the development plans of any neighbouring authority have any implications for the CS employment provision or vice versa? What would be the implications for delivery of allocations in St Edmundsbury, the Ipswich Policy Area and for Babergh?

3.2 Whether the employment provision would be out of line with the RS and whether this would have any undesirable consequences.

3.3 Is the East of England Forecasting Model a suitable basis for determining the amount and location of employment land?

3.4 Whether the amount of land allocated is compatible with the Western Suffolk Employment Land Review. Whether the employment provision would be compatible with effective joint working across boundaries

3.5 How would the employment land allocations affect the development of sites outside the District? Is the approach to employment land provision justified in the light of a) development/ and b) allocations elsewhere in the region?

3.6 Would the allocations undermine the delivery of strategic development sites or sustainably better sites elsewhere? Would that have an effect on infrastructure delivery elsewhere?

3.7 Because of the increase in housing provision in the CSFR, would the increased provision of employment land have any impact on out commuting? If so what? Can it be quantified? What impacts would there be on traffic within Stowmarket and along the A14? How do the employment provisions comply with the strategic objective SO3? How would SO3 be measured?

3.8 What would be the environmental impact of the allocations of land that is not previously developed and would any identified be outweighed by other matters? If so what would those be? What is the agricultural quality of the land allocations and is there poorer quality land that should be used in preference.

3.9 Are the Use Classes specified sufficiently flexible or would they unduly restrict business opportunities, and restrict potential deliverability. Is the mix of uses proposed on sites satisfactory? What are the implications of the split in uses on job delivery? Should the split of uses be better identified in policy FC3?

3.10 Is there potential for large scale leisure or retail development coming forward on employment sites? If so what would be the implications?

3.11 Are the allocations realistic and deliverable? What are the implications of current economic conditions?

3.12 Would the CSFR be sufficiently flexible to ensure that it remained relevant to ongoing market conditions?

3.13 Is there is a need for tighter or looser phasing and would phasing of employment provision be sufficiently specific to comply with Strategic Objective 6?

3.14 Is sufficient provision made for the infrastructure requirements of employment development? Is viability sufficiently accounted for?

## 4.0 Housing

**Whether the amount and distribution of housing land would meet the full objectively assessed need for market and affordable housing in the housing market area as far as would be consistent with the policies of the Framework and whether this housing provision would be deliverable within the plan period.**

4.1 Whether there is any need for tighter phasing/timing and whether phasing of housing provision would be sufficiently specific to comply with Strategic Objective 6.

4.2 Whether the quantity, location, nature, density and affordability of housing would comply with national policy and the RS.

4.3 What are the most up to date housing land supply figures? How do these support or otherwise the CSFR housing provision? How has the delivery of housing performed since the adoption of the CS?

4.4 Would the CSFR comply with NPPF section 6 *delivering a wide choice of high quality homes*?

4.5 Whether the CSFR is consistent with the 50% brownfield target set in the Core Strategy policy CS7?

4.6 Are the amounts of housing shown for the sites realistic and achievable? How have the quantities been worked out and could the sites provide more than specified in the allocations?

4.7 Whether the housing allocations, quantity and greenfield/brownfield split in the CSFR are supported by the SHLAA.

4.8 Whether the distribution of housing throughout the district would be appropriate and adequately reflects the settlement hierarchy in the CS. Whether there is any need to re-visit the settlement hierarchy set in the CS. Explain the changed quantities of housing for each settlement area including the reduction of homes in the Ipswich Policy Area to 170 from 800.

4.9 Whether housing allocations skew development further towards Stowmarket and whether the proportions allocated to Stowmarket are adequate.

4.10 Whether the housing allocations necessitate the additional greenfield allocations for employment.

4.11 How will the housing allocations made in the CS fit with other Mid Suffolk development plan documents proposed and proposals/permissions in other parts of the district?

4.12 Do the development plans of any neighbouring authority have any implications for the CS housing provision or vice versa?

4.13 Are the housing policies sufficiently clear and robust to deliver new residential development which will address the need for differing household sizes and for diverse groups?

4.14 Are the phasing periods realistic? What are the implications of the current economic conditions? What account has been taken of availability?

4.15 Whether the CSFR will assist in the provision of affordable housing. Whether sufficient provision would be made for the infrastructure requirements of housing development. Whether viability is sufficiently accounted for.