

Examination of the New Castle Point Local Plan

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INSPECTOR'S INITIAL MATTERS, ISSUES AND QUESTIONS

My name is Philip Lewis, I am a chartered Town Planner and I was appointed by the Secretary of State for Housing, Communities and Local Government on 26 November 2020 to examine the soundness of the Plan, and whether it meets the requirements of the Planning and Compulsory Purchase Act 2004 (the Act) and associated Regulations. The Plan being examined is the New Castle Point Local Plan Pre-submission Plan December 2019.

My Examination of the Plan commenced with my appointment and to date I have undertaken initial reading of the Plan, the evidence base documents and representations, following which I posed a number of initial questions to the Council. My letter and the Council's response have been published on the Examination website.

I have now identified the matters and issues and have posed the key questions for the examination. These are set out in this document.

In drafting this document, I have also had regard to the Council's response to my initial questions and the various evidence base documents which have been published by the Council to accompany their response. I advise you to read the Council's further submissions when you prepare your statements.

Please read and be familiar with the accompanying Inspectors Guidance Note which sets out important details of the organisation and conduct of the Examination and the hearings, and regarding the preparation of hearing statements. I shall assume that the Guidance Note has been read by participants at the Hearings.

It may be that some of the questions set out in this document will be answered in written statements. Consequently, I will not need to consider them further at the Hearings as I would have sufficient information. The scope of specific hearing sessions will be confirmed in the agendas published on the Examination website. **It is important to note that written representations and oral representations carry the same weight, and I will have equal regard to views put at a hearing or in writing.** Representors should only address those matters, issues and questions relevant to their original representations.

Any reply to my questions should be in accordance with the guidelines set out in my Guidance Note and should be sent electronically to the Programme Officer by **5.00 pm on Thursday 8 April 2021**. Given that the hearings will be held virtually and ongoing national Coronavirus measures, it is expected that hearing statement will only be submitted electronically.

Matter 1: Procedural/legal requirements

Issue: Whether all Statutory and Regulatory requirements have been met?

Duty to Cooperate

- Q.1 Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the 2004 Act?
- Q.2 What are the specific outcomes of the Duty to Cooperate?

Sustainability Appraisal

- Q.3 Did the Council comply with The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) in the preparation of the Sustainability Appraisal?
- Q.4 Is the Sustainability Appraisal (SA) adequate?
- Q.5 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?
- Q.6 Did the Council, through the iterative SA process, take into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?
- Q.7 Is the SA report sufficiently clear and self-contained in the demonstration of the consideration of reasonable alternatives?

Habitats Regulations Assessment

- Q.8 Has the Habitats Regulations Assessment (HRA) been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017?
- Q.9 Has the HRA adequately identified the Habitats sites which may be subject to significant effects arising from the Plan?
- Q.10 Has the HRA screened all the proposed allocations and transport schemes and considered potential in-combination effects?
- Q.11 Is the Plan consistent with the findings of the HRA?

Local Development Scheme

- Q.12 Is the Plan compliant with the Council's Local Development Scheme in terms of its form, scope and timing?

Community Involvement

- Q.13 Has the Council complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

Climate Change

Q.14 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?

Equalities

Q.15 In what way does the plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Superseded policies

Q.16 Is Appendix 7 of the Plan clear in identifying the policies of the existing development plan which would be superseded by the Plan?

Matter 2: The Plan Period

Issue – Is the Plan period justified and consistent with national policy?

Q.17 The submitted plan covers the plan period 2018 to 2033. The Framework in paragraph 22 sets out that strategic policies should look ahead over a minimum 15 year period from adoption. What is the justification for a plan and strategic policies that would not look ahead a minimum 15 years from adoption?

Matter 3 The Green Belt

Issue: Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust? Are the Green Belt policies clear, justified and consistent with national policy and will they be effective?

Q.18 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

Q.19 In terms of paragraph 138 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

Q.20 Have all realistic alternatives to releasing land from the Green Belt been considered, such as development outside of the Green Belt, further development in the urban area or increasing development densities, and

would the most efficient use of land proposed for release from the Green Belt be made?

- Q.21 Is the site selection methodology for sites to be released from the Green Belt robust?
- Q.22 In overall terms, having regard to the principles established in *Calverton*, (*Calverton PC v Nottingham CC* [2015] EWHC 1078 (Admin)) what are the exceptional circumstances for the proposed alterations of the boundaries of the Green Belt to accommodate the level development proposed which cannot be accommodated outside of the Green Belt?
- Q.23 Are the special circumstances demonstrated for altering the Green Belt boundary as set out in the document *Proposed Changes to the Green Belt in the Pre-Submission Local Plan (GB-006)*.

NB. The specific Green Belt boundary alterations arising from the proposed allocations will be considered separately in later Hearing sessions.

Strategic Policy GB1 Green Belt Strategy

- Q.24 Does the Policy serve a clear purpose, avoiding unnecessary duplication of national policy for Green Belts as expressed in the Framework?
- Q.25 Is the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?
- Q.26 Is the Policy consistent with national policy for Green Belts as expressed in the Framework?

Strategic Policy GB2 New Development in the Green Belt

- Q.27 Does the Policy serve a clear purpose, avoiding unnecessary duplication of national policy for Green Belts as expressed in the Framework?
- Q.28 Is the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal? Is the Policy consistent with national policy for Green Belts as expressed in the Framework?
- Q.29 What is the clear justification for restricting national permitted development rights as is intended by part 3 of the Policy?
- Q.30 Is the Policy consistent with the findings of the HRA?

Strategic Policy GB3 Extensions and alterations to, and Replacement of Buildings in the Green Belt

- Q.31 Does the Policy serve a clear purpose, avoiding unnecessary duplication of national policy for Green Belts as expressed in the Framework and other policies of the proposed Plan, such as the design policies?
- Q.32 Is the Policy consistent with national policy for Green Belts as expressed in the Framework?
- Q.33 What is the clear justification for restricting national permitted development rights as is intended by part 3 of the Policy?

Local Policy GB4 limited Infill – Special Policy Areas

- Q.34 What is the justification for the definition of the Special Policy Areas, is this consistent with national policy for Green Belts and would the Policy be effective?
- Q.35 Is it intended that the Policy would render the erection of buildings in these areas as not being inappropriate development in the Green Belt? If so, upon what basis?
- Q.36 Given the boundaries of the Special Policy Areas defined on the Policies Map and the nature of the land so defined, what is envisaged in respect of 'limited infill'?
- Q.37 What is the clear justification for restricting national permitted development rights as is intended by part 3 of the Policy?

Local Policy GB5 Change of Use of Buildings and Land in the Green Belt

- Q.38 Is the Policy consistent with national policy for Green Belts as expressed in the Framework?
- Q.39 What is meant by criterion 1.d of the Policy?
- Q.40 What is the clear justification for restricting national permitted development rights as is intended by part 2 of the Policy?

Local Policy GB6 Ancillary Buildings and Structures in the Green Belt

- Q.41 Is the Policy consistent with national policy for Green Belts as expressed in the Framework, particularly in regard to inappropriate development?
- Q.42 What is the justification for part 2 of the Policy and is this clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?

Strategic Policy GB7 Positive Uses in the Green Belt

- Q.43 Is the Policy consistent with national policy for Green Belts as expressed in the Framework?
- Q.44 Is the Policy consistent with the findings of the HRA?

Strategic Policy GB8 Enclosure and Boundary Treatment in the Green Belt

- Q.45 Is the Policy consistent with national policy for Green Belts as expressed in the Framework?
- Q.46 What is meant by 'semi-openness' in part 3 of the Policy and is this consistent with national policy?

Matter 4: Delivering a sufficient supply of homes

Issue: Is the overall strategy and provision for housing development effective and justified?

A: Calculating the housing need

- Q.47 What is the level of local housing need for Castle Point derived from the standard method using the most recent median workplace-based affordability ratios to apply an affordability adjustment, and capping as per the Planning Practice Guidance?
- Q.48 Are there circumstances to justify a higher housing need figure than the standard method indicates?

B: The Supply of Housing

- Q.49 What is the up to date level of housing supply proposed to be provided by the plan?
- Q.50 Which sites make up the extant permissions included with the housing trajectory and what is the evidence that they are either deliverable or developable as per the Framework definitions?
- Q.51 What is the compelling evidence for the supply of housing from windfall sites through the plan period?
- Q.52 What are the specific sites included in the housing land supply from the Brownfield Register and Policy Compliant SHLAA sites and what is the evidence that they are either deliverable or developable as per the Framework definitions?
- Q.53 Whilst the proposed housing allocations will be considered separately, are the broad assumptions made as to site capacity and when houses would be delivered realistic and justified? Is it effective and justified to express site capacity for a number of sites as being up to a certain number of homes?
- Q.54 Will there be a five-year supply of deliverable housing sites on adoption of the Plan?
- Q.55 Given historic levels of housing completions in the Plan area, are the numbers of units envisaged to be built per annum in the plan area as set out in the trajectory realistic and achievable?

C: Housing needs and Strategic Policy HO3 Housing Mix

- Q.56 Does the Plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework?
- Q.57 Is Strategic Policy HO3 justified and would it be effective in meeting the housing needs of different groups in the community?
- Q.58 The Framework in paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and be reflected in planning policies. Has the size, type and tenure of properties needed for the Plan Area been adequately assessed and would the Policy be effective in meeting needs?
- Q.59 In particular and with regard to the Public Sector Equality Duty, does the Plan identify the housing requirements of older and disabled people, does it set clear policies to address these particular needs and has the viability implications of meeting the housing needs of these groups been taken into account?

Q.60 Would the Plan be effective in meeting the housing needs of people wishing to commission or build their own homes?

Q.61 Are the proposed modifications necessary for soundness?

D: The Housing Requirement

Q.62 The submitted Plan sets a housing requirement based upon the local housing need figure of 342 homes per annum. The Framework in paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development.

- a) Does the plan positively seek opportunities to meet the housing needs of the area and is it sufficiently flexible to adapt to rapid change?
- b) The plan is seeking to meet the minimum local housing need for the plan period 2018 – 2033. Should the plan provide for some 'headroom' in terms of housing supply over the minimum local housing need figure and if so, would this be justified?
- c) In the context of paragraph 11 b) of the Framework, are there reasons which indicate that strategic policies should not provide for the minimum objectively assessed needs for housing? If so, how should any unmet need be addressed?

Q.63 The level of housing development proposed represents a significant increase from that achieved per annum in recent years. Is there evidence to justify a stepped housing requirement so as to transition between the supply of housing arising from current policies and achieved to date in the plan period, to that proposed in the Plan?

E: Provision for Gypsies, Travellers and Travelling Showpeople

Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers and travelling showpeople?

Q.64 Has the identified need for additional pitches for Gypsies and Travellers been robustly calculated and up to date, and is the approach taken in the Plan to meeting identified need justified and consistent with the Planning Policy for Traveller Sites (PPTS)?

Q.65 How would the needs of the wider community who reside in caravans including people who are no longer classified as gypsies, travellers or travelling showpeople be identified and addressed by the Plan?

Q.66 Is part 1a) of Policy HO7 sufficiently clear so that it is evident as to how a decision maker should react to a development proposal? Is the requirement that a site has good access to healthcare, schools and other community facilities consistent with national policy as expressed in the PPTS?

- Q.67 Would the Policy be effective in providing for the provision of new Gypsy and Traveller accommodation whilst safeguarding the living conditions of the occupants of nearby property?
- Q.68 Given Strategic Policy GB2 New Development in the Green Belt, is part 2 of Strategic Policy HO7 necessary?
- Q.69 Are the proposed modifications necessary for soundness?

F Housing Policies

Strategic Policy HO1 Housing Strategy

- Q.70 A number of criteria set out in parts 2, 3 and 4 of Strategic Policy HO1 appear to duplicate other policies of the plan. Do the criteria serve a clear purpose and is it evident as to how a decision maker should react to development proposals? Would the criteria be better expressed in a separate strategic policy to address the strategic priorities of the area?

Strategic Policy HO2 Master Planning

- Q.71 Is Policy HO2 consistent with paragraphs 39 – 46 of the Framework in expecting master plans and/or planning or development briefs for all major housing development proposals and entering into voluntary planning performance agreements with promoters?
- Q.72 Are the proposed modifications necessary for soundness?

Strategic Policy HO4 Securing More Affordable Housing

- Q.73 Is the evidence for the requirement for affordable housing need justified by robust and up to date evidence?
- Q.74 Are the thresholds for seeking affordable housing justified, effective in terms of viability considerations and consistent with national policy?
- Q.75 Why are some thresholds expressed as absolutes whilst other are expressed as 'up to'?
- Q.76 Is the Policy clear as to the circumstances where viability should be assessed in decision making?
- Q.77 Are the proposed modifications necessary for soundness?

Strategic Policy HO6 Caravan and Park Homes

- Q.78 Is Strategic Policy HO6 consistent with the findings of the HRA?

Local Policy HO8 Residential Annexes

- Q.79 What is the justification for the provisions relating to ownership in criterion 1 a. given that the sale of such property would not be an act of development?
- Q.80 Is part 2 of the Policy consistent with national policy for Green Belts as set out in paragraphs 143 to 145 of the Framework? Why would a detached annex proposed in the Green Belt be treated as a new dwelling, when a detached annex outside of the Green Belt would not be?

Matter 5: Housing Allocations

Issue: Are the proposed housing allocations justified, effective and consistent with national policy?

Local Policy HO9 Land west of Benfleet

- Q.81 What are the exceptional circumstances for the release of the site and nearby land as a consequential change from the Green Belt?
- Q.82 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.83 What is the justification for the site to specifically deliver 850 new homes?
- Q.84 In the absence of the Policy clearly defining the scale of health care facility and residential care home required, would it be effective in securing the provision of the community hub?
- Q.85 How many care units are intended to be provided by the proposed care home? Would these be net of the 850 dwelling figure?
- Q.86 Would the Policy be effective in ensuring that any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.87 With particular regard to nearby Habitats sites and SSSI and the possible transport mitigation including increasing capacity on the A130 northwards of the site access, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?
- Q.88 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.89 Are the proposed Modifications necessary for soundness?

Local Policy HO10 Land between Felstead Road and Catherine Road, Benfleet

- Q.90 Having regard to the recommendations of the Heritage Impact Assessment, would Policy HO10 be effective in conserving and enhancing the historic environment?
- Q.91 Would the Policy be effective in pursuing opportunities for net gains for biodiversity?
- Q.92 Would the Policy be effective in safeguarding existing public rights of way?
- Q.93 Does the Policy set out a clear design vision and expectations for the proposed site as per paragraph 125 of the Framework and would it be effective?
- Q.94 What is the justification for the site capacity being 'up to 89 new homes'?
- Q.95 What are the exceptional circumstances for the release of the site and the neighbouring land from the Green Belt?
- Q.96 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.97 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?

Q.98 Are the proposed Modifications necessary for soundness?

Local Policy HO11 Land off Glyders, Benfleet

Q.99 With particular regard to nearby Habitats sites and SSSI, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?

Q.100 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?

Q.101 Taking account of ground conditions and any risks from land instability, is the site suitable for the proposed use?

Q.102 What is the justification for the site capacity being 'up to 30 new homes'?

Q.103 What is the evidence that safe and suitable access can be provided for all users, during construction and any future occupation of the site?

Q.104 What are the exceptional circumstances for the release of the site and neighbouring land from the Green Belt?

Q.105 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?

Q.106 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?

Q.107 Are the proposed Modifications necessary for soundness?

Local Policy HO12 Site of the former WRVS Hall, Richmond Avenue, Benfleet

Q.108 Would the Policy be effective in ensuring that the development would be safe for its lifetime without increasing flood risk elsewhere?

Q.109 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?

Q.110 Are the proposed Modifications necessary for soundness?

Local Policy HO13 Land east of Rayleigh Road, Hadleigh

Q.111 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?

Q.112 Does the Policy set out a clear design vision and expectations for the proposed site as per paragraph 125 of the Framework and would it be effective?

Q.113 Would the Policy be effective in providing for necessary community facilities?

Q.114 Would the Policy be effective in achieving safe and suitable access to the site for all users, and would any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?

Q.115 What are the exceptional circumstances for the release of the site and nearby land from the Green Belt?

Q.116 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?

- Q.117 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.118 Are the proposed Modifications necessary for soundness?

Local Policy HO14 Land at Brook Farm, Hadleigh

- Q.119 What is the justification for the site capacity being 'up to 173 new homes'?
- Q.120 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?
- Q.121 Is the Policy clear in regard to the provision of 'greenways' and would it be effective in this regard?
- Q.122 The boundary of the proposed allocation site as shown on the Policies Map and that of the Green Belt appear to differ from that considered in the Castle Point Borough Green Belt Review - Part 2 update 2019 (GB-004). Has a specific Green Belt assessment been undertaken for the proposed allocation site?
- Q.123 Is the Policy clear in regards to the provision of off-site sustainable drainage measures in the context of paragraph 147 of the Framework?
- Q.124 What are the exceptional circumstances for the release of the site from the Green Belt?
- Q.125 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.126 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.127 Are the proposed Modifications necessary for soundness?

Local Policy HO15 Land south of Scrub Lane, Hadleigh

- Q.128 What is the justification for the site capacity being 'up to 55 new homes'?
- Q.129 Is the Policy consistent with national policy in respect of open space and recreation as set out in paragraphs 96 – 97 of the Framework and is it justified?
- Q.130 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.131 Are the proposed Modifications necessary for soundness?

Local Policy HO16 Land at Oak Tree Farm, Hadleigh

- Q.132 What is the justification for the site capacity being 'up to 65 new homes'?
- Q.133 With particular regard to the Great Wood and Dodd's Wood SSSI, would the Policy be effective in protecting and enhancing biodiversity?
- Q.134 Is the allocation of land for housing within an area of Flood Zones 2 and 3 justified in terms of the sequential test? Would the Policy be effective in applying the results of the Exception Test?
- Q.135 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?

- Q.136 What are the exceptional circumstances for the release of the site from the Green Belt?
- Q.137 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.138 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.139 Are the proposed Modifications necessary for soundness?

Local Policy HO17 Hadleigh Island, Hadleigh

- Q.140 What is the justification for the site capacity being 'up to 52 new homes'?
- Q.141 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.142 Are the proposed Modifications necessary for soundness?

Local Policy HO18 Land north of Grassmere Road and Borrowdale Road, Thundersley

- Q.143 What is the justification for the site capacity being 'up to 30 new homes'?
- Q.144 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?
- Q.145 Would the Policy be effective in achieving safe and suitable access for all users consistent with paragraph 108 of the Framework?
- Q.146 The boundary of the proposed allocation site as shown on the Policies Map and that of the Green Belt appear to differ from that considered in the Castle Point Borough Green Belt Review - Part 2 update 2019 (GB-004). Has a specific Green Belt assessment been undertaken for the proposed allocation site?
- Q.147 Is the Policy clear in regards to the provision of off-site sustainable drainage measures in the context of paragraph 147 of the Framework?
- Q.148 What are the exceptional circumstances for the release of the site from the Green Belt?
- Q.149 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.150 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.151 Are the proposed Modifications necessary for soundness?

Local Policy HO19 Land at Glebelands, Thundersley

- Q.152 What is the justification for the site capacity being 'up to 155 new homes'?
- Q.153 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?
- Q.154 Would the Policy be effective in providing for safe and suitable access for all users, and have the appropriate opportunities to promote sustainable

transport modes been taken up consistent with paragraph 108 of the Framework?

- Q.155 What are the exceptional circumstances for the release of the site and neighbouring land from the Green Belt?
- Q.156 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.157 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.158 Are the proposed Modifications necessary for soundness?

Local Policy HO20 The Chase, Thundersley

- Q.159 What is the justification for the site capacity being 'up to 340 new homes'?
- Q.160 Does the Policy set a clear design vision and expectations for the proposed site as per paragraph 125 of the Framework and would it be effective?
- Q.161 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?
- Q.162 In the absence of the Policy clearly defining the scale of health care facilities and educational requirements, would it be effective in securing necessary provision?
- Q.163 Is the Policy consistent with national policy in respect of open space and recreation as set out in paragraphs 96 – 97 of the Framework and is it justified?
- Q.164 What are the exceptional circumstances for the release of the site and neighbouring land from the Green Belt?
- Q.165 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.166 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.167 Are the proposed Modifications necessary for soundness?

Local Policy HO21 Land fronting Rayleigh Road, Thundersley

- Q.168 What is the justification for the site capacity being 'up to 60 new homes'?
- Q.169 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.170 Are the proposed Modifications necessary for soundness?

Local Policy HO22 Land at Thames Loose Leaf, Kiln Road, Thundersley

- Q.171 What is the justification for the site capacity being 'up to 12 new homes'?
- Q.172 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.173 Are the proposed Modifications necessary for soundness?

Local Policy HO23 Land east of Canvey Road, Canvey Island

- Q.174 What is the justification for the site capacity being 'up to 300 new homes'?
- Q.175 Does criterion 2. which appears to phase the proposed development, serve a clear purpose, and is it justified?
- Q.176 Given the proximity of designated heritage assets including the Roman Saltern Scheduled Monument and having regard to the findings of the Heritage Impact Assessment, would the Policy be effective in conserving and enhancing the historic environment?
- Q.177 With particular regard to the Canvey Wick Site of Special Scientific Interest, would the Policy be effective in protecting and enhancing biodiversity and securing net measurable gains in biodiversity?
- Q.178 Would the Policy be effective in ensuring that any development would, in terms of flood risk, be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.179 What is the evidence that safe and suitable access can be provided for all users?
- Q.180 Is it justified to restrict occupation of homes on the site until the new access onto Canvey Road has been provided?
- Q.181 What are the exceptional circumstances for the release of the site and neighbouring land from the Green Belt?
- Q.182 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.183 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.184 Are the proposed Modifications necessary for soundness?

Local Policy HO24 Land west of Canvey Road, Canvey Island

- Q.185 What is the justification for the site capacity being 'up to 196 new homes'?
Is the proposed care home included within the 196 homes?
- Q.186 Does criterion 2. which appears to phase the proposed development serve a clear purpose, and is it justified?
- Q.187 Given the proximity of a designated heritage asset and having regard to the findings of the Heritage Impact Assessment, would the Policy be effective in conserving and enhancing the historic environment?
- Q.188 With particular regard to the Canvey Wick Site of Special Scientific Interest, would the Policy be effective in protecting and enhancing biodiversity and securing net measurable gains in biodiversity?
- Q.189 Would the Policy be effective in ensuring that any development would, in terms of flood risk, be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.190 Would the Policy be effective in ensuring that an appropriate buffer is applied to the Hill Hall Dyke, a designated Main River?
- Q.191 What are the exceptional circumstances for the release of the site and neighbouring land from the Green Belt?
- Q.192 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?

- Q.193 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.194 Are the proposed Modifications necessary for soundness?

Local Policy HO25 Land at Thorney Bay Caravan Park

- Q.195 Given the existing planning status of the site and ongoing redevelopment, does the proposed allocation serve a clear purpose?
- Q.196 Are there any matters which would mean that the site allocation as proposed is not deliverable or developable as per Framework definitions?
- Q.197 What is the evidence that around 820 park homes would be provided at the site? Is there a reasonable prospect that these would come forward within the plan period?
- Q.198 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 155 – 161 of the Framework?
- Q.199 Would the policy be effective in safeguarding sufficient land alongside existing sea defences in order to accommodate any potential enhancement works to the defences?
- Q.200 Would the safeguarding of land for Roscommon Way be effective given the existing planning status of the site? What is the robust evidence for safeguarding land for Roscommon Way?
- Q.201 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?
- Q.202 Are the proposed Modifications necessary for soundness?
- Q.203 The proposed Main Modifications seek contributions towards affordable housing and health and social care on the net level of housing growth. Are these requirements consistent with the tests for planning obligations set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010?

Local Policy HO26 Land at the Point, Canvey Island

- Q.204 What is the justification for the site capacity being 'up to 100 new homes'?
- Q.205 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 155 – 161 of the Framework, with particular regard to ensuring that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.206 Would the policy be effective in safeguarding sufficient land alongside existing sea defences in order to accommodate any potential enhancement works to the defences?
- Q.207 With particular regard to nearby Habitats sites and SSSI, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?
- Q.208 Would the Policy be effective in minimising impacts on and providing net gains for biodiversity consistent with paragraph 170 of the Framework?

- Q.209 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.210 Are the proposed Modifications necessary for soundness?

Local Policy HO27 Walsingham House, off Lionel Road, Canvey Island

- Q.211 What is the current planning status of the site?
- Q.212 What is the justification for the site capacity being 'up to 32 new homes'?
- Q.213 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 155 – 161 of the Framework, with particular regard to ensuring that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.214 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.215 Are the proposed Modifications necessary for soundness?

Local Policy HO28 Land at Admiral Jellicoe, Canvey Island

- Q.216 What is the current planning status of the site?
- Q.217 What is the justification for the site capacity being 'up to 40 new homes'?
- Q.218 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 155 – 161 of the Framework, with particular regard to ensuring that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.219 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.220 Are the proposed Modifications necessary for soundness?

Local Policy HO29 Land south of Haron Close, Canvey Island

- Q.221 What is the current planning status of the site?
- Q.222 What is the justification for the site capacity?
- Q.223 What is the evidence that safe and suitable access can be provided for all users?
- Q.224 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.225 Are the proposed Modifications necessary for soundness?

Local Policy HO30 Land at Haystack carpark, Canvey Island

- Q.226 What is the current planning status of the site?
- Q.227 What is the justification for the site capacity being 'up to 14 new homes'?

- Q.228 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.229 Are the proposed Modifications necessary for soundness?

Local Policy HO31 Land to the east of Kings Park Village, Canvey Island

- Q.230 What is the justification for the site capacity being 'up to 50 new homes'?
- Q.231 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 155 – 161 of the Framework, with particular regard to ensuring that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?
- Q.232 Would the policy be effective in safeguarding sufficient land alongside existing sea defences in order to accommodate any potential enhancement works?
- Q.233 With particular regard to nearby Habitats sites, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?
- Q.234 What are the exceptional circumstances for the release of the site from the Green Belt?
- Q.235 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?
- Q.236 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.237 Are the proposed Modifications necessary for soundness?

Local Policy HO32 Land at 244-258 London Road, Hadleigh

- Q.238 What is the justification for the site capacity being 'up to 50 new homes'?
- Q.239 Does criterion 2. which appears to phase the proposed development serve a clear purpose and is it justified?
- Q.240 Given the proximity of a designated heritage asset and having regard to the findings of the Heritage Impact Assessment, would the Policy be effective in conserving and enhancing the historic environment?
- Q.241 Are there any matters which would mean that the site is not deliverable or developable as per Framework definitions?
- Q.242 Are the proposed Modifications necessary for soundness?

Matter 6: Economic Strategy and Policies

Issue: Is the strategy and provision for employment development effective and justified?

Strategic Policy EC1 Economic Strategy

- Q.243 On 1 September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force, amending the

Town and Country Planning (Use Classes) Order 1987. As a consequence, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Q.244 What is the justification for the protection of the identified employment land (Criterion 1a) as shown on the Policies Map and is this consistent with part 11 of the Framework, Making Effective Use of Land?

Q.245 Is the proposed provision of land for new employment development above the baseline employment land requirement identified in the South Essex Economic Development Needs Assessment 2017 (ER-002) justified?

Q.246 Are the proposed Modifications necessary for soundness?

Local Policy EC2 New Employment Land

Q.247 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Q.248 Are the proposed Modifications necessary for soundness?

Local Policy EC2 Extension to Manor Trading Estate

Q.249 Is the proposed allocation of employment land justified?

Q.250 Is part 1.b. of the Policy consistent with paragraph 174 of the Framework in respect of biodiversity net gain?

Q.251 What are the exceptional circumstances for the release of the site from the Green Belt?

Q.252 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 139 of the Framework?

Q.253 Are the proposed Modifications necessary for soundness?

Local Policy EC2 Extension to Charfleets Industrial Estate

Q.254 What is the planning status of the site, to what extent has the site been delivered and is part 2 of the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Local Policy EC2 South of Northwick Road

Q.255 What is the planning status of the site, to what extent has the site been delivered and is part 3 of the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Local Policy EC3 Canvey Seafront Entertainment Area

Q.256 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written

and unambiguous, so it is evident how a decision maker should react to development proposals?

Q.257 With particular regard to nearby Habitats sites, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?

Q.258 Is the retail floorspace threshold justified?

Q.259 Are the proposed Modifications necessary for soundness?

Local Policy EC4 Canvey Port Facilities

Q.260 With particular regard to nearby Habitats sites, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?

Q.261 Would the Policy be effective in ensuring that the development would be safe for its lifetime without increasing flood risk elsewhere?

Q.262 Given the hazardous substances handled at the port facilities, would the Policy be effective in ensuring public safety through the prevention of major accidents and limiting their consequences, and is it justified? Conversely, would the Plan be effective (such as through Local Policy NE9) in ensuring that the existing businesses at the Port would not have unreasonable restrictions placed upon them as a result of new development proposed?

Q.263 Given the process for the consenting of Nationally Significant Infrastructure Projects (NSIP) and the designated National Policy Statements, is the Policy as worded clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Matter 7 Development Management Policies

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

Strategic Policy SD1 Making Effective Use of Land

Q.264 Are the proposed Modifications necessary for soundness?

Strategic Policy SD2 Development Contributions

Q.265 Is Strategic Policy SD2 consistent with paragraph 56 of the Framework and the Community Infrastructure Levy Regulations 2010 in respect of the tests for planning obligations, and would it be effective?

Q.266 Is the Policy effective and consistent with national policy in requiring compliance with the Infrastructure Delivery Plan (IDP) which is not a development plan document and given that the IDP is a 'living' document, the latest version of which does not quantify the level of contributions required for certain infrastructure?

Strategic Policy TC1 Town Centre Strategy

- Q.267 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.268 What is the justification for the definition of the Primary Shopping Frontages as indicated on the Policies Map?
- Q.269 Is the floorspace threshold for retail impact assessments justified by the evidence and consistent with national policy?
- Q.270 Are the proposed Modifications necessary for soundness?

Local Policy TC2 Canvey Island and Hadleigh Town Centre Regeneration

- Q.271 Does the Policy serve a clear purpose and given that it is ultimately for the courts to decide if something is a material consideration, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Local Policy TC3 Local Shopping Parades

- Q.272 What is the justification for the definition of the Local Shopping Parades as indicated on the Policies Map?
- Q.273 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.274 Are the proposed Modifications necessary for soundness?

Local Policy TC4 Out of Centre Retail Parks

- Q.275 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.276 Is the floorspace threshold for retail impact assessments justified by the evidence and would its intended application be consistent with the sequential test for the defined main town centre uses as per national policy?
- Q.277 Are the proposed Modifications necessary for soundness?

Local Policy TC5 South Benfleet Leisure Quarter

- Q.278 What is the justification for the definition of the South Benfleet Leisure Quarter as indicated on the Policies Map?
- Q.279 As a consequence of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.280 Are the proposed Modifications necessary for soundness?

Strategic Policy TC6 Fast Food Outlets

- Q.281 With regard to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.282 What is the justification for the restrictions on thresholds for concentrations of hot food takeaways in part 1 of the Policy, and the 400 metres walking distance set out in part 2 of the Policy? How does the Policy relate to Strategic Policy HS1 Strategy for Healthy Communities?
- Q.283 Are the proposed Modifications necessary for soundness?

Strategic Policy HS1 Strategy for Healthy Communities

- Q.284 With regard to the design and location of new development to promote good health, and avoid sources of harm to health, is part 1.d. of the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals?
- Q.285 What is required in a Health Impact Assessment and are the proposed development thresholds justified?
- Q.286 Are the proposed Modifications necessary for soundness?

Strategic Policy HS2 Opportunities for Indoor Leisure and Sports

- Q.287 Is the Policy consistent with national policy for open space and recreation as set out in paragraphs 96 and 97 of the Framework, would it be effective and is it justified?
- Q.288 Are the proposed Modifications necessary for soundness?

Strategic Policy HS3 Opportunities for Outdoor Recreation

- Q.289 Is the additional outdoor bowls provision on Canvey justified?
- Q.290 Are the proposed Modifications necessary for soundness?

Strategic Policy HS4 Education, Skills and Learning

- Q.291 Are the requirements of parts 2 and 3 of the Policy consistent with the tests for planning obligations set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010?
- Q.292 Are the proposed Modifications necessary for soundness?

Strategic Policy HS5 Health and Social Care

- Q.293 Are the requirements of part 2 of the Policy consistent with the tests for planning obligations set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010?
- Q.294 Are the proposed Modifications necessary for soundness?

Strategic Policy HS6 Community Facilities

- Q.295 Is the Policy consistent with national policy for open space and recreation as set out in paragraphs 96 and 97 of the Framework and should part 2 of the Policy exclude sports facilities and open space given other Plan policies?
- Q.296 Are the proposed Modifications necessary for soundness?

Strategic Policy HS7 Open Spaces, Allotment Gardens, and Playing Fields associated with Educational Uses

- Q.297 Is the Policy consistent with national policy for open space and recreation as set out in paragraphs 96 and 97 of the Framework?
- Q.298 Are the proposed Modifications necessary for soundness?

Strategic Policy TP1 Transport Strategy

- Q.299 With particular regard to Habitats sites and SSSIs, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?

Table 14.1: Strategic Highways Improvements

- Q.300 Table 14.1 lists a number of strategic highway improvements. Whilst some are detailed and are reflected in Policy TP2, others such as a new access for Canvey Island, lack detail and have not been subject to detailed design, SA or HRA and are not proposed in the Plan as transport schemes for the Plan period. Consequently, are the strategic highway improvements set out in Table 14.1 justified and does Table 14.1 serve a clear purpose?

Q.301 Are the proposed Modifications necessary for soundness?

Table 14.2: Highway Improvements from Growth

Q.302 Are the proposed Modifications necessary for soundness?

Local Policy TP2 Improvements and Alterations to Carriageway Infrastructure

Q.303 With particular regard to Habitats sites and SSSI, would the Policy be effective in protecting and enhancing biodiversity and is it consistent with the findings of the HRA?

Q.304 Is the dualling of the northern section of the A130 Canvey Way likely to have an adverse effect on the nearby SSSI, and would the benefits of the scheme clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest as per paragraph 175 of the Framework?

Q.305 What is the robust evidence for safeguarding transport routes as per paragraph 104 of the Framework?

Q.306 Are the proposed Modifications necessary for soundness?

Local Policy TP3 Improvements to Footpaths, Bridleways and Cycling Infrastructure

Q.307 Are the proposed Modifications necessary for soundness?

Strategic Policy TP4 Improvements to Public Transport Infrastructure and Services

Q.308 Are the requirements of the Policy consistent with the tests for planning obligations set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010?

Q.309 Are the proposed Modifications necessary for soundness?

Strategic Policy TP5 Highway Impact

Q.310 Would the Policy be effective in requiring all development proposals that are likely to generate amounts of movements to be accompanied by a Transport Assessment or Transport Statement and a Travel Plan, and is this proportionate?

Q.311 Is the Policy consistent with national policy as set out in paragraph 108 of the Framework?

Q.312 Would part 4 of the Policy be effective in not referring to agreements under the Highways Act?

Q.313 Are the proposed Modifications necessary for soundness?

Strategic Policy TP6 Safe and Sustainable Access

Q.314 Are the proposed Modifications necessary for soundness?

Strategic Policy TP7 Parking Provision

Q.315 Is the Policy clearly written, unambiguous, so it is evident how a decision maker should react to development proposals?

Strategic Policy CM1 Communications infrastructure Strategy

Q.316 Is part 1 of the Policy consistent with the requirements of the General Permitted Development Order and national policy as set out in the Framework in paragraph 115

Q.317 Would the Policy be effective in achieving adequate provision of new communications infrastructure in development?

Strategic Policy DS1 General Design Principles

Q.318 Are the proposed Modifications necessary for soundness?

Strategic Policy DS2 Landscaping

Q.319 Is Part 1 of the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?

Strategic Policy DS3 Advertisements

Q.320 Is the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?

Strategic Policy CC2 Tidal Flood Risk Management Area

Q.321 Is the Policy consistent with national policy for planning and flood risk as set out in the Framework and would it be effective in managing tidal flood risk?

Q.322 Would the Policy be effective in regard to the Exceptions Test in Part 3.a?

Q.323 Is it justified to require development to reduce flood risk to neighbouring properties?

Q.324 Would the Policy be effective in providing space for physical flood protection measures on Canvey Island as per paragraph 149 of the Framework?

Q.325 Is the Policy consistent with the findings of the HRA?

Q.326 Are the proposed Modifications necessary for soundness?

Strategic Policy CC3 Flood Risk Management

- Q.327 Is the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?
- Q.328 Is the Policy consistent with national policy for planning and flood risk as set out in the Framework?
- Q.329 Are the proposed Modifications necessary for soundness?

Strategic Policy CC4 Sustainable Buildings

- Q.330 Is the Policy consistent with national policy for meeting the challenge of climate change as set out in the Framework?
- Q.331 Is part 4 of the Policy clearly written and unambiguous in regard to the requirements for water efficiency? The Proposed Main Modification M18.14 introduces a criterion requiring compliance with the optional water efficiency requirements as set out in the Building Regulations. Is that justified?
- Q.332 Part 2 of the Policy appears to duplicate part 1.
- Q.333 Are the proposed Modifications necessary for soundness?

Strategic Policy NE1 Green Infrastructure and the Undeveloped Coast

- Q.334 Would the Policy be effective in safeguarding water environment components of local wildlife rich habitats and wider ecological networks?
- Q.335 Is the Policy consistent with paragraph 174 of the Framework in regard to seeking a net increase in biodiversity?
- Q.336 Is the Policy consistent with the findings of the HRA?
- Q.337 Are the proposed Modifications necessary for soundness?

Local Policy NE2 Protection of Historic Natural Landscapes

- Q.338 What is the justification for the designation of Historic Natural Landscapes? Are these areas intended to be 'valued landscapes' as per paragraph 170 of the Framework?
- Q.339 Is the proposed Modification necessary for soundness?

Local Policy NE3 The South Canvey Green Lung

- Q.340 What is the justification for the designation of the South Canvey Green Lung and would it be effective, given the area identified on the Policies Map and the safeguarding proposed for the route for Roscommon Way?

Local Policy NE4 Local Wildlife Sites

- Q.341 What is the justification for the identified Local Wildlife Sites?
- Q.342 Would the Policy be effective and is it consistent with national policy as set out in paragraph 175 of the Framework?
- Q.343 Is the proposed Modification necessary for soundness?

Strategic Policy NE5 Ecologically Sensitive and Designated Sites

- Q.344 Is the Policy consistent with national policy for habitats and biodiversity as set out in the Framework and would it be effective?
- Q.345 Are the proposed Modifications necessary for soundness?

Local Policy NE6 Protecting and Enhancing the Landscape and Landscape Features

- Q.346 Is the Policy consistent with the findings of the HRA?
- Q.347 Are the proposed Modifications necessary for soundness?

Strategic Policy NE7 Pollution Control

- Q.348 Is the Policy consistent with paragraph 182 of the Framework in regard to existing businesses and facilities not having unreasonable restrictions placed upon them as a result of development permitted after they were established?
- Q.349 Is part 3 of the Policy consistent with the tests for planning obligations set out in paragraph 56 of the Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010?
- Q.350 Are the proposed Modifications necessary for soundness?

Local Policy NE9 Developments near Hazardous Uses

- Q.351 Does the Policies Map reflect the most recent HSE Consultation Zones?

Local Policy NE10 Ensuring Capacity at Water Recycling Centres

- Q.352 Are the requirements of the Policy in respect of sustainable drainage systems consistent with national policy as set out in paragraph 165 of the Framework and would it be effective?
- Q.353 Is the Policy consistent with the findings of the HRA?
- Q.354 Are the proposed Modifications necessary for soundness?

Strategic Policy HE1 Conserving and Enhancing the Historic Environment

- Q.355 Is the Policy clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal?
- Q.356 Is the Policy consistent with national policy for conserving and enhancing the historic environment as set out in the Framework? In particular:
- Would the Policy be effective in sustaining and enhancing the significance of heritage assets?

- In distinguishing between designated and non designated heritage assets? And
- In respect of where substantial/less than substantial harm may occur to designated heritage assets?

Q.357 Are the proposed Modifications necessary for soundness?

Chapter 21 - Monitoring and Review

Q.358 Are the proposed Modifications necessary for soundness?

Appendices

Q.359 Are the proposed Modifications necessary for soundness?

Philip Lewis

INSPECTOR

5 February 2021