

## CHILTERN CORE STRATEGY EXAMINATION

### INSPECTOR'S COMMENTS ON THE DRAFT SCHEDULES OF CHANGES

1. As requested in my note of 4 May 2011, the Council has provided me with working drafts of the schedules before their finalisation for public consultation. My purpose in reviewing the schedules at this stage is solely as a procedural check, to try and ensure that: no significant changes have been included in the minor changes schedule; the topics requiring changes for soundness set out in my note have been addressed in some way; that there are no obvious oddities in the proposed wording and that they address matters consistently. I am not commenting on the merits of the changes.

#### Minor changes schedule (CDN124)

2. The following 2 changes are not minor and should be moved to the significant changes schedule:
- Par 9.3: The additional sentence being added imposes additional requirements on the redevelopment of the site and relevant parties must have the opportunity to comment.
  - Appendix 4 (of the Core Strategy) - addition of parts of GB5 to the policies to be superseded, since this will have an immediate effect (on adoption) of the application of policy to planning applications.

3. An additional minor change needs incorporating in 9.5 (already in the schedule) to provide an explanation consistent with what is shown in new Table 2, namely: *we have not made an allowance within the first 10 years for any windfalls or unforeseen....*

#### Proposed Significant Changes (CDN125)

4. No change is proposed to the first target for Strategic Objective 3. Paragraph 4.7 of my previous note makes clear that the target (75% of all etc) is not useful or logical. As a minimum it should be deleted. Given the proposed new monitoring measures for policy C2, I leave to the Council whether it wants to add anything new for SO3.
5. Change C3 a) new para 7.7 Line 4: *that that*.
6. Change C5 new para 9.0c last line. Would it be clearer to say: *as the contribution from the strategic and MDS housing sites begins to reduce since the sites in the SHLAA are themselves identified*.
7. Change C5 new para 9.0f. At the end, some further explanation is needed for clarity and consistency with Table 2 and other references to small sites. I suggest (if this is, indeed, what the Council has done): *Table 2 does not include any contribution from such small sites in years 1-10. Years 11-15 include an annual average of 39 dwellings from this source (195 dwellings in total). This figure is less than the average achieved in the past to reflect the inevitable uncertainties with predicting delivery so far in the future*.

8. Affordable Housing policy CS8 - Change C7a. In the new paragraph *The Council recognises...* both references to *requirements* should be deleted and replaced with *targets*, as advised in my previous note (8.5). Also, the word *exceptionally* should be deleted (since in depressed market conditions it would be common-place).
- 9 Policy CS16, change C9 (e). The retained sentence *Except as provided for below...* does not sit comfortably with the implications of the review of designations introduced in the new first sentence. As a minimum to be logical, the retained sentence should be amended along the lines of: *Except as arising from the above review and as provided for below.* Also in this sentence does the Council still mean to say *equivalent amounts of employment land* (my emphasis)? Would not provision for a comparable amount of *employment* (or similar) better fit the Council's intentions?
10. The need to address the anomaly arising from the wording of Local Plan policies GB4 and GB5 was set out at some length in my previous note. The proposed changes C10a and C10b and the superseding of part of GB5 would produce a clear outcome, but do not explain why the change is needed or justified. To make sense, the text needs to acknowledge that there is a problem, namely that GB5 refers to *limited development* (something more than infilling), but the GB5 villages have been retained in the Green Belt, contrary to the approach to such "limited development" villages set out in PPG2. There then needs to be an explanation of why it is no longer intended to allow limited development (but only infilling) in these villages. Depending on why the Council has come to the conclusion that it has, the brief explanation in the plan will need to be supported by an expanded justification and/or other supporting evidence. Any such evidence will need to be published and open to comment as part of the consultation.

### **Other matters**

11. In making the above comments, I have not seen the new Topic Paper which I suggested be prepared, nor have I seen any revised Sustainability Appraisal which I also previously referred to. I am not intending to make any comment on these documents prior to the consultation.
12. If the Council does not intend to make the changes set out in paragraphs 4 and 8 above they should be included in a schedule of Inspector proposed changes, although I hope that such a schedule will not be necessary.
13. I have considered all the additional written representations in relation to the strategic allocation at the Holy Cross site under policy CS6. I do not require any changes to be made in relation to this policy. As with other matters on which I am likely to find the plan sound, my reasoning will be in my report in due course.

**Simon Emerson**  
**INSPECTOR**  
**26 May 2011**