

Core Strategy for Chiltern District

Chiltern District Council - Response to Inspector's Questions [ID/4]

MAIN MATTER 1: Issues, Vision and Objectives

DATE: 18 March, 2011

Final

The following Paper sets out the Council's response to Section 2 'Main Matter 1: Issues, Vision and Objectives' of the document 'Inspector's Main Matters and Questions' ID/4. The Paper has been structured to include the specific questions raised by the Inspector (in bold) and the Council's detailed response to them.

Q2.2) Do the 8 spatial issues at paragraph 4.5 address the main challenges which the Core Strategy needs to address?

CDC Response:

The Council considers that the spatial issues set out in paragraph 4.5 address the main challenges affecting the District and there has been nothing in discussions with partners, stakeholders or consultation responses to suggest otherwise. The relationship between the Issues, Vision, Objectives and Policies is set out in more detail in Appendix 1 of the Core Strategy.

A few representations draw attention to the Government's proposed route for a high speed railway line, which passes through Chiltern District. This is mentioned at 14.3 of the CS. I understand that the Council is opposed to this proposal. There is no need for the Core Strategy to address the controversy.

Q2.3) If the line were to proceed, would it have any implications for the strategy which the document should address, or would it require a

review of the Core Strategy? Would any such implications arise primarily at the end of the current Core Strategy period?

CDC Response:

The proposed line for HS2 does not cut through any strategic sites for housing or for other purposes. If the railway project were to proceed, it would not affect the spatial strategy but would have an adverse impact on the character of the area towards the end of the plan period. As HS2 is a proposal rather than a committed scheme, this is not something that can be addressed in the CS.

Q2.4) Are cross boundary issues adequately addressed in setting the context? Have any concerns been raised by adjoining authorities/agencies?

CDC Response:

The Council has sought the views of adjoining authorities at various stages of the Core Strategy. Neither the Council nor its neighbours has identified any significant cross-boundary issues. The early sections of the Core Strategy set out to describe Chiltern District in its sub-regional context.

Q2.5) To what extent should the Visions for individual settlements reflect any local expression of a vision by that community? Do they?

CDC Response:

The Council considered it important that the visions for the individual settlements should reflect local expression of a vision by that community. Accordingly, the visions for the individual settlements included in the CS emerged from the work on Market Town Health Checks, Community Appraisals and Parish Plans carried out by community and revitalisation groups (see footnotes to the visions).

Q2.6) How will the Core Strategy help deliver these settlement visions? Is the Core Strategy sufficiently spatial in its engagement of the issues and visions?

CDC Response:

As stated at paragraph 5.5, these settlement visions are intended to provide the context for a series of measures to be set out in the Delivery DPD (and perhaps in future neighbourhood plans in the light of the Localism Bill) which are aimed at shaping and supporting the work of the communities. In the Council's view, the CS is sufficiently spatial in its engagement of the issues and visions in that it goes beyond traditional land use planning and addresses issues such as access to jobs, skills, anti-social behaviour, safety, healthy lifestyle choices etc.

Q2.7) Does the Core Strategy seeks to advance any measures to address the acknowledged pockets of localised deprivation (paragraph 3.3)? Does it have a role to play in addressing such matters?

CDC Response:

There are elements in the Core Strategy such as the protection of employment land and community facilities which have a bearing on this issue. It is the Council's view that more detailed matters, would be best picked up as part of the specific measures needed to support and shape the work of the communities in the Delivery DPD. The District Council's Community Cohesion Plan (CDN102) sets out actions which aim to tackle some of the problems in areas of deprivation.

Q2.8) Are the Strategic Objectives appropriate and are the targets an appropriate measure of how each objective should be met? Objective 1 (amount of housing) and objective 2 (proportion of affordable housing) will be discussed under main matters 3 and 6 and do not need to be separately addressed here.

CDC Response:

Objective 3 sets out key sustainability principles, is in line with national and regional policy and the wishes of the community and is considered to be entirely appropriate. Comments on the target are set out below.

Comments on Objective 4 are set out below.

Objective 5 is in line with national and regional policy and has received strong local support. The associated target is measurable and is seen as a good yardstick of the health, vitality and viability of local centres, in line with Policy EC9.1c of PPS4.

Objective 6 is in line with national and regional policy and reflects the combined work of many local authorities and their partners and the work of the Chilterns Conservation Board. Comments on the target are set out below.

Objective 7 is in line with national policy and reflects local support for measures to improve care for the elderly and those with special needs. The Council has suggested (in its table of minor changes, CDN117) that the target should be changed to “360 additional places for the elderly in care homes, nursing homes and/or extra care homes”. This is in line with the County Council’s evidence base in its “12 Year Housing Plan for People with Special Needs” (CDN071).

Objective 8 ensures that the needs of groups other than those singled out in Objective 7 are covered. Monitoring will keep abreast of new facilities that are provided, but it is not considered appropriate or realistic to set targets for the provision of new facilities as precise requirements are not known.

Q2.9) Is objective 4 (no net loss of employment land or floor space) appropriate as an objective, since the wording of the objective, the related target and the policy approach (CS16) are essentially the same? Should the objective express an overall aim or outcome, rather than perhaps the means to an end?

CDC Response:

Objective 4 is in line with paragraph 25.17 of the South East Plan which reflected the EIP Panel's recommendation (26.2) that the scale of employment land in Chiltern District should be protected. It is accepted that the objective could be reworded so as to express an overall aim or outcome, rather than a means to an end, for example "Retain a thriving local economy".

Q2.10) A number of representations question the appropriateness of the target relating to sustainable locations (SO3). Based on the evidence used to assess the sustainability of locations for development (e.g. CDN008 & 009), is this the most appropriate practical measure? Does it provide a reasonable measure of the effectiveness of the Council's chosen spatial strategy (of urban concentration)? Should any change of this indicator also change the identical indicator under policy CS1 Table 1?

CDC Response:

This target was derived from the SHLAA 2008 (page 33) which set out that, in order to be a Category 1 or 2 SHLAA site, developments needed to be within 400m of a bus stop and less than 1 mile from a town centre. The thinking behind this, as set out in the SHLAA 2008, was that bus services more than a mile from a town centre are likely to be less frequent than those in close proximity to a town centre, where differing routes intersect and continue on to similar town centre destinations. The proposed target is capable of being measured relatively easily. A more complex, but more resource-intensive, alternative might be to assess sites in relation to the location of facilities (e.g. those listed in Table 1 of Appendix A in CDN009). The Council accepts that any agreed target could also be applied to Table 1.

Q2.11) Should the target for SO6 (AONB/natural assets) refer to National and Local Biodiversity Action Plans or should these be referred to in indicators under policy CS1 Table 1? Council to respond to points made by Bucks, Berks and Oxfordshire Wildlife Trust (414840).

Representation made by BBOWT (414840)

BBOWT has suggested that the current proposed targets of 'Improvement in indicators set out in the AONB Management Plan' and 'Improved local biodiversity (National Indicator NI197)' are insufficient to meet the key principles of PPS9 Biodiversity and Geological Conservation. Key Principle (ii) in PPS9 requires that 'plan policies should aim to maintain and enhance, restore or add to biodiversity.' BBOWT says that targets that focus on management of local sites and the objectives of the AONB only will not be in line with the targets of the local and National Biodiversity Action Plan. Key Principle (iii) of PPS9 also requires that 'Plan policies on the form and location of development should take a strategic approach to the conservation, enhancement and restoration of biodiversity and recognise the contribution that sites, areas and features, both individually and in combination make to conserving these resources'. BBOWT considers that the current targets do not allow for this strategic approach which is the aim of the Biodiversity Opportunity Areas.

CDC Response:

Key Principles (ii) and (iii) within paragraph 1 of PPS9, relate to plan policies rather than objectives and the Council considers that the inclusion of such targets against the Strategic Objectives of the Core Strategy is unnecessary. The Council considers that policy CS24 (Biodiversity) and its targets demonstrates compliance with the key principles of PPS9. It applies across the District, not just within the AONB. BBOWT did not voice any objection to the content and conformity of policy CS24 in its representations made at Publication stage.