

**DACORUM BOROUGH COUNCIL**

**CORE STRATEGY**

**INDEPENDENT EXAMINATION**

**ISSUES AND QUESTIONS FOR THE  
EXAMINATION**

**Including draft timetable**

5th October 2012

## Independent Examination of The Dacorum Core Strategy

## INDEPENDENT EXAMINATION OF THE DACORUM CORE STRATEGY

**Venue:** The hearing sessions will be held in the Bulbourne Room at the Civic Centre, Hemel Hempstead. Sessions will commence on Tuesday 9 October 2012 at 10.00am.

**Council:** Dacorum Borough Council will be participating in all hearing sessions.

### Statement deadlines:

All Statements, for the Hearing Sessions must be sent to the Programme Officer by **midday on Friday 21 September**. This deadline relates to the receipt of the both **paper and electronic copies**.

### Statements:

The Inspector requests written responses from the Council to all the matters raised.

Written Statements from Representors are not compulsory but if Representors feel one is warranted they should only seek to answer the Inspector's Questions as far as they relate to their original representations.

**The examination starts from the assumption that the Council has submitted what it considers to be a sound Plan. The hearings will therefore be concerned only with considerations relating to the soundness or otherwise of the document, and all submissions should address that issue.**

The Guidance Notes provided set out the requirements for the presentation of all Statements. Its provisions should be thoroughly read and implemented as otherwise Statements could be returned. Please note the 3,000 word limit.

In the Statements from respondents it would be very helpful for the Inspector to have a brief concluding section stating:

- What part of the Core Strategy is unsound.
- Which soundness criterion it fails.
- Why it fails (point to the key parts of your original representations).
- How the Core Strategy can be made sound.
- The precise change and/or wording that you are seeking.

The Inspector will give equal weight to views put orally or in writing.

**If you have any queries – please contact the Programme Officer, Ian Kemp, on 01527 837920 (office) / 07723 009166 (mobile) or via [idkemp@sky.com](mailto:idkemp@sky.com)**

## Programme in Summary

**Please note that where multiple Issues are listed against a single session it will not be possible to provide an exact time for their commencement. It is intended that these sessions would follow on from the previous one and due to the nature of a debate it will be difficult to provide participants with a definitive indication of when such sessions would commence. You are of course welcome to keep in touch with the Programme Officer who will do his best to keep you updated on progress.**

<b>WEEK 1</b>	
<p>Tuesday 9<sup>th</sup> October 2012 <b>10.00 – 13.00</b></p> <p><b>Opening Announcements</b> Inspector &amp; Dacorum Borough Council</p> <p><b>Issue 1: Basis for the Overall Strategy</b></p> <p><b>14.00 – 17.00</b></p> <p><b>Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt</b></p>	
<p>Wednesday 10<sup>th</sup> October 2012 <b>10.00 – 13.00</b></p> <p><b>Issue 3: Accessibility</b></p> <p><b>Issue 4: Design and Using Resources Efficiently</b></p> <p><b>14.00 – 17.00</b></p> <p><b>Issue 5: Strengthening Economic Prosperity</b></p>	
<p>Thursday 11<sup>h</sup> October 2012 <b>10.00 – 13.00</b></p> <p><b>Issue 6: Providing Homes</b></p> <p><b>14.00 – 17.00</b></p> <p><b>Issue 8: Meeting Communities Needs</b></p> <p><b>*Please note the sessions for Issues 7 &amp; 9 have been cancelled although affordable housing is an item on the agenda for Issue 6</b></p>	
<p>Friday 12<sup>th</sup> October 2012 <b>10.00 – 13.00</b></p> <p><b>Reserve Session</b></p>	

<b>WEEK 2</b>	
<p>Tuesday 16th October 2012</p> <p><b>10.00 – 13.00</b></p> <p><b>14.00 – 17.00</b></p>	<p><b>Place Strategies:</b></p> <p><b>Issue 10: Hemel Hempstead</b></p> <p><b>Issue 11: Berkhamstead</b></p>
<p>Wednesday 17<sup>th</sup> October 2012</p> <p><b>10.00 – 13.00</b></p> <p><b>14.00 – 17.00</b></p>	<p><b>Issue 12: Tring</b></p> <p><b>Issue 13: Kings Langley</b></p> <p><b>Issue 14: Bovington</b></p> <p><b>Issue 15: Markyate</b></p>
<p>Thursday 18<sup>th</sup> October 2012</p> <p><b>10.00 – 13.00</b></p> <p><b>14.00 – 17.00</b></p>	<p><b>Issue 16: Countryside</b></p> <p><b>Issue 17: Implementation, Delivery, Infrastructure and Monitoring</b></p> <p><b>Closing Comments</b> Dacorum Borough Council and Inspector</p> <p><b>Reserve Session</b></p>

### Preamble

In answering the following questions respondents should identify the deficiency in the submitted Core Strategy and should make clear how the document should be changed.

If the Inspector is satisfied that an Issue or Question has been satisfactorily addressed in the submitted Statements it is possible that it may not be included on the final Agenda. Consequently the timetable and lists of participants may be subject to change, so please contact the Programme Officer or view the programme on the Examination page of the Council's website.

**Tuesday 9 October - 10.00**

**Issue 1: Basis for the Overall Strategy**

(Detailed housing figures will be considered under Issue 6)

***Participants:***

***Dacorum Borough Council***

***Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)***

***Grand Union Investments (Martin Edwards / Jane Barnett)***

***W Lamb (David Lander)***

***The Crown Estate (Clive Harridge)***

***Linden Homes (Mark Carter)***

Questions

- 1.1 Does the DPD have regard to national and regional policy and if there are any divergences how are these justified? What are the implications of the forthcoming revocation of Regional Spatial Strategies? Are there satisfactory linkages with the Dacorum Sustainable Community Strategy and other local strategies?
- 1.2 In general terms is the overall strategy based on a sound assessment of the socio-economic and environmental characteristics of the area and are the impacts of the proposals properly addressed? Would an appropriate balance between providing new homes and safeguarding the quality of life of existing residents be achieved?
- 1.3 Is the DPD based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Is there too much reliance on the preparation of 'subsequent plans' and are such plans identified in the Local Development Scheme?
- 1.4 Will the Strategic Objectives (page 37) satisfactorily address the identified challenges (page 29)?
- 1.5 Is the relationship between the Core Strategy, the Dacorum Borough Local Plan (1991-2011) and the Proposals Map sufficiently clear?

**Tuesday 9 October - 14.00**

**Issue 2: The Distribution of Development (settlement hierarchy) and the Green Belt**

(Settlement and site specific issues will be considered under the Place Strategies)

***Participants:***

***Dacorum Borough Council***

***E J Hillier Will Trust (Jo Unsworth)***

***Emery Planning Partnership (Stephen Harris)***

***Gleeson Strategic Land (Bob Selwood)***

***Taylor Wimpey (Martin Friend)***

***CPRE Hertfordshire (Steve Baker)***

***CALA Homes (Simon Prescott)***

***Bovingdon Parish Council (Mike Kember / Jake Collinge)***

***Berkhamsted Town Council (Alan Kemp)***

***Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)***

***Grand Union Investments (Martin Edwards / Jane Barnett)***

***The Crown Estate (Clive Harridge)***

***W Lamb (David Lander)***

***Banner Homes (Les West)***

***Linden Homes (Mark Carter)***

Questions

- 2.1 What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?
- 2.2 Is the site selection process based on appropriate criteria?
- 2.3 What is the justification for holding local allocations in reserve? What will be the process for bringing forward their release and is it set out in sufficient clarity?
- 2.4 Have the proposed amendments to the green belt boundary been properly justified and has the Council's approach heeded national guidance? What are the exceptional circumstances that exist to justify such revisions?
- 2.5 Paragraph 83 of the National Planning Policy Framework refers to the permanence of the green belt in the long-term so that they should be capable of enduring beyond the plan period and paragraph 85 refers to the identification of safeguarded land. How does the Core Strategy address the possible need to safeguard land? Should a review of the complete green belt boundary have been undertaken, including an assessment of whether or not there are any major developed sites (other than those in Table 2) that should be

identified? Can the Council be confident that the green belt boundary will not have to be altered at the end of the plan period?

- 2.6 How and when will settlement boundaries be reviewed?
- 2.7 Should limited infilling in selected small villages in the green belt be restricted to only affordable housing for local people? Paragraph 54 of the NPPF suggests that consideration be given to allowing some market housing to facilitate the provision of significant additional affordable housing. Should this approach be more clearly reflected in the Core Strategy?

### **Wednesday 10 October - 10.00**

#### **Issue 3: Accessibility**

##### ***Participants:***

***Dacorum Borough Council / Hertfordshire County Council  
Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)***

##### Questions

- 3.1 What are the transport implications of the locational strategy for housing and employment? Will the strategy facilitate the use of sustainable modes of transport?
- 3.2 Have transport needs been properly identified and have those needs been adequately addressed? Is the reliance on forthcoming Transport Plans appropriate?
- 3.3 Is the Council's approach to car parking provision clear and justified?
- 3.4 What are the small-scale improvements referred to in paragraph 4 of policy CS9?

#### **Issue 4: Design and Using Resources Efficiently**

##### ***Participants:***

***Dacorum Borough Council  
Berkhamsted Town Council (Alan Kemp)  
Aviva (Tim Price)  
Dacorum Green Party (Paul Harris)***

## Questions

- 4.1 Is the overall approach to design appropriate and will it result in distinctive development that will add to the character of the Borough?
- 4.2 What is the relationship between the existing Character Area Appraisals and Assessments and the proposed Urban Design SPD ?
- 4.3 Policy CS11(a) refers to 'density intended in an area'. Where is advice on the appropriate densities for an area?
- 4.4 Are the links between 'Securing Quality Design' (chapter 10) and 'Using Resources Efficiently' (chapter 18) sufficiently clear? Is policy CS29 consistent with the relevant national guidance, including in relation to climate change? Is the policy overly prescriptive? The last paragraph refers to 'tree canopy requirements' but criterion (h) refers to the provision of new trees (not specifically their canopy). Should this be clarified?
- 4.5 Is the Council's approach to the alleviation of flood risk and to water management satisfactory? Is sufficient weight attached to the need to protect water resources and improve existing treatment works and drainage networks in the Borough?
- 4.6 Is sufficient weight attached to the potential for the use of renewable technologies? What is the 'future guidance' referred to in the second paragraph of policy CS28?
- 4.7 Are the requirements of Table 11 (as proposed to be amended by MC60) reasonable and justified?
- 4.8 Is the Council's approach to providing funding through a 'sustainability offset fund' justified?

## **Wednesday 10 October - 14.00**

### **Issue 5: Strengthening Economic Prosperity**

#### ***Participants:***

***Dacorum Borough Council***  
***The Crown Estate (Clive Harridge)***  
***Aviva (Tim Price)***  
***Garrick Stevens***

## Questions

- 5.1 Does the Core Strategy provide sound guidance for economic growth in the Borough relative to its needs? Is policy CS14 sufficiently detailed, flexible and clear? NPPF (paragraph 21) advises that a clear economic vision and strategy for the area should be set out which positively and proactively encourages sustainable economic growth. Is the strategy for the Borough as a whole sufficiently clear and flexible enough to allow for a rapid response to changes in economic circumstances?
- 5.2 Does the Core Strategy include sufficient support for the promotion of a strong rural economy?
- 5.3 How will the 10,000 jobs (policy CS14) be translated into floorspace when specific sites are allocated in subsequent plans? What is the 'minimum supply of land' and 'long-term', as referred to in policy CS15? How, and in what document, will the minimum supply of land, referred to in policy CS15 be identified? On what evidence is the 131,000 sqm of additional office floorspace based? Policy CS15 refers to a number of general locations (e.g. land in town centres, employment areas in the green belt and core office locations) but it is not clear where these are. Why is the policy not more explicit?
- 5.4 Is there sufficient clarity regarding the infrastructure required to enable economic growth, including the expansion of electronic communications networks?
- 5.5 Are the floorspace figures in policy CS16 based on robust evidence? How will the 'opportunities' be 'given'? How will demand be assessed? There is reference to the creation of a new local centre at Maylands (para 13.3). Why is this not specifically proposed in policy CS16?
- 5.6 Is sufficient support provided for the retention and strengthening of local shopping centres? Is the classification of the various locations of retail provision (Table 5) appropriate and justified? What is the role of Jarman Fields retail centre and is its designation as an out-of-centre location justified?
- 5.7 What is the role of the Borough in terms of tourism? Is sufficient guidance given on the Council's approach to the issue?

## **Thursday 11 October - 10.00**

### **Issue 6: Providing Homes**

#### ***Participants:***

***Dacorum Borough Council  
E J Hillier Will Trust (Jo Unsworth)***

**Emery Planning Partnership (Stephen Harris)**  
**Mrs McWilliams (Edward Sibley)**  
**Gleeson Strategic (Bob Selwood)**  
**Taylor Wimpey (Martin Friend)**  
**CPRE Hertfordshire (Jacqueline Veater)**  
**CALA Homes (Simon Prescott)**  
**Berkhamsted Town Council (Alan Kemp)**  
**Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)**  
**Grand Union Investments (Martin Edwards / Simon Elliot / Jane Barnett)**  
**The Crown Estate (Clive Harridge)**  
**W Lamb (David Lander)**  
**Banner Homes (Les West)**  
**Dacorum Green Party (Paul Harris)**  
**Linden Homes (Mark Carter)**

## Questions

- 6.1 Are the housing policies consistent with national guidance and supported by clear and robust evidence? Is the identification of strategic sites and local allocations appropriate and is the status of the SS and LA policies clear? There are no local allocations or strategic sites included in the Place Strategies for Kings Langley or the Countryside. Is this a satisfactory approach to take? How will the Council assess planning applications for development in these locations?
- 6.2 Is the information in the Strategic Housing Land Availability Assessment (2011) soundly based? Have current economic conditions been taken into account?
- 6.3 Is the apportionment of growth between the settlements properly justified?
- 6.4 Is the overall housing provision based on a sound assessment of supply and demand? In particular:
  - (a) will the Core Strategy meet the full objectively assessed needs for market and affordable housing in the Borough?
  - (b) are the expectations for delivery of existing commitments reasonable?
  - (c) is the proposed trajectory realistic and can it be delivered?
  - (d) what assessment of previously developed land has been undertaken?; and
  - (e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economy and financial constraints, land ownership and infrastructure provision?
- 6.5 Bearing in mind the significant need for housing in the Borough, why was the higher growth option discounted?
- 6.6 What is the role of neighbouring local planning authorities in accommodating some of Dacorum's housing needs and can it be demonstrated that it is a role which they are undertaking?

- 6.7 Proposed minor change MC26 refers to a shortfall in housing provision of 15% being used as a trigger for action by the Council. What is the justification for the 15% figure?
- 6.8 Should the Core Strategy establish the Council's overall approach to housing densities, as suggested in paragraph 47 of the NPPF?
- 6.9 How will the housing needs of villages in rural areas be met?

## **Thursday 11 October - 14.00**

### **Issue 8: Meeting Community's Needs**

#### ***Participants:***

***Dacorum Borough Council  
Tring Sports Forum (Andy Criddle)  
CPRE Hertfordshire (Jacqueline Veater)  
New Gospel Hall Trust (John Shepherd)  
Dacorum Green Party (Paul Harris)***

#### Questions

- 8.1 Have the needs for open space, sport and recreation facilities been appropriately assessed? Is the Council's evidence base (e.g. 2008 Open Space Study) sufficiently robust?
- 8.2 Is the Council's approach to the provision of community facilities satisfactory? Will community needs be met? Policy CS23 refers to Zones being defined in the green belt for new school facilities. How will this be achieved? School facilities will also be supported on Open Land, which is defined as areas of open space over 1ha, protected from development. Is this approach justified?
- 8.3 Proposed minor change MC31 suggests that additions to the identified provision for community facilities 'are possible'. Where and when will such additions be identified and why can they not be identified in the Core Strategy?

## **Tuesday 16 October - 10.00**

### **Issue 10: Place Strategies: Hemel Hempstead**

#### ***Confirmed Participants:***

***Dacorum Borough Council***

***Mrs McWilliams (Edward Sibley)***

***Gleeson Strategic Land (Mark Jackson)***

***CPRE Hertfordshire (Michael Nidd \*Also attending on own behalf)***

***Jeanette Corfield***

***Brenda Mariner***

***The Crown Estate (Clive Harridge)***

***W Lamb (David Lander)***

***Aviva (Tim Price)***

***Jake Leith***

#### Questions

- 10.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Can local infrastructure satisfactorily accommodate the proposed growth? Have all reasonable alternative sites been assessed? Has the transport infrastructure required to support the proposed growth been properly assessed and can it be satisfactorily provided?
- 10.2 What are the implications for Hemel Hempstead with regard to development on land to the east within St Albans City and District? Is the proposed boundary of the East Hemel Hempstead AAP appropriate and justified? Have all the opportunities for development to the east of Hemel Hempstead been robustly explored?
- 10.3 Are the local allocations (particularly LA1 and LA2) justified and are the principles for their development sound?
- 10.4 What public consultation has been undertaken with regard to LA2? Have the requirements of the Council's Statement of Community Involvement been met?
- 10.5 Is the boundary of the Hemel Hempstead Town Centre appropriate and justified? Should there be reference to the provision of a bus station?
- 10.6 Are the requirements for the Maylands Business Park (CS34) justified and consistent with the advice in Figure 18?
- 10.7 Are the opportunities in The Gade Zone (Figure 17 on page 169) clear and do they incorporate sufficient flexibility?

- 10.8 What is the Council's approach to development at Apsley (in particular Apsley Mills retail park). Is it appropriately reflected in the Core Strategy?

## **Tuesday 16 October - 14.00**

### **Issue 11: Berkhamsted**

#### ***Participants:***

***Dacorum Borough Council***

***Quilichan Consultancy (Roger Tym)***

***CPRE Hertfordshire (Eliza Hermann)***

***Berkhamsted Town Council (Alan Kemp)***

***Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)***

***Anne Foster***

***Grand Union Investments (Martin Edwards / Jane Barnett)***

***Taylor Wimpey / Herts CC / Egerton Rothesay School (Jeremy Woolf)***

***Grahame Partridge***

***Save Your Berkhamsted Residents Association (Alan O'Neil)***

***Banner Homes (Les West)***

***Nick Hanling***

***Stephen Proudfoot***

***Garrick Stevens***

***Northchurch PC (Cllr Alan Fantham)***

***Lone Star Land Ltd (Andrew Wilkins)***

#### Questions

- 11.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Have all reasonable alternative sites been assessed?
- 11.2 Is proposal SS1 properly justified, particularly in terms of sustainability? Is there an issue of flood risk to be addressed? What is the timetable for the submission of a planning application?
- 11.3 Have the consequences of development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 11.4 Is there a need for additional retail and/or employment floorspace to be allocated in the town?
- 11.5 Should there be a specific policy for the town as a whole in order to ensure that the Council's vision will be delivered?

11.6 Is local allocation LA4 (Shootersway, Berkhamsted) properly justified?

## **Wednesday 17 October - 10.00**

### **Issue 12: Tring**

#### ***Participants:***

***Dacorum Borough Council  
Emery Planning Partnership (Stephen Harris)  
Tring Sports Forum (Andy Criddle)  
CPRE Hertfordshire (Elizabeth Hamilton)  
CALA Homes (Simon Prescott)***

#### Questions

- 12.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Is sufficient weight attached to providing employment opportunities in Tring?
- 12.2 Is allocated site LA5 the most appropriate location for development in Tring when assessed against the alternatives, particularly in terms of sustainability?
- 12.3 Have the consequences of development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 12.4 Is sufficient protection afforded to the AONB and the overall setting of the town?
- 12.5 Has the Council satisfactorily addressed the need for leisure and sporting facilities in Tring? Is Ickneild Way the most appropriate location for new playing fields?
- 12.6 Should there be a policy for the town as a whole in order to ensure that the Council's vision will be delivered?

## **Wednesday 17 October - 14.00**

### **Issue 13: Kings Langley**

#### ***Participants:***

***Dacorum Borough Council  
Alan Barker (David Lane)***

#### Questions

- 13.1 Is the vision for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Should there be a specific policy for the village as a whole in order to ensure that the Council's vision will be delivered?
- 13.2 Is the Council's approach to education provision satisfactory and in particular is it clear what policies apply to Kings Langley Secondary School?
- 13.3 Have the consequences of infill development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 13.4 Can it be demonstrated that the Council has and will continue to co-operate with Three Rivers District Council with regard to development at Kings Langley?

### **Issue 14: Bovingdon**

#### ***Participants:***

***Dacorum Borough Council  
E J Hillier Will Trust (Jo Unsworth)  
Bovingdon Parish Council (Jake Collinge)  
Maggie Campbell (Kevin Coleman)***

#### Questions

- 14.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

- 14.2 Is the Chesham Road allocation (LA6) sound when assessed against reasonable alternatives?
- 14.3 Should there be a specific policy for the village as a whole in order to ensure that the Council's vision will be delivered?

### **Issue 15: Markyate**

***Participants:***

***Dacorum Borough Council  
ZBV (Kate Fleming)***

Questions

- 15.1 Is the vision and the proposal for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? What is the timetable for the submission of a planning application?
- 15.2 Is the identification of the Hicks Road Industrial Estate as a General Employment Area (para 12.1) appropriate and justified?
- 15.3 Are there adequate measures in place to secure the retention of existing Hicks Road businesses, albeit in different premises?
- 15.4 Should there be a specific policy for the village as a whole in order to ensure that the Council's vision will be delivered?

### **Thursday 18 October - 10.00**

### **Issue 16: Countryside**

***Participants:***

***Dacorum Borough Council  
Mr and Mrs Glasser  
Plato Estate Ltd (Phillip Plato)  
Berkhamsted Residents Action Group (Antony Harbidge / Peter Brown / Sarah Lightfoot)***

## Questions

- 16.1 Are the vision and local objectives for the countryside appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?
- 16.2 Is sufficient protection afforded to the AONB? Is sufficient protection given to the setting of the Borough's towns and villages?
- 16.3 What is the Council's approach towards the re-use and extension of rural buildings and is it justified?
- 16.4 What is the Council's approach to the provision of moorings on the Grand Union Canal and is it justified?
- 16.5 Is the settlement boundary for Wilstone justified?

## **Issue 17: Implementation, Delivery, Infrastructure and Monitoring**

### ***Participants:***

***Dacorum Borough Council  
Garrick Stevens***

## Questions

- 17.1 Does the Core Strategy give sufficient guidance on the provision of the infrastructure that is required to support both existing and future development? Is infrastructure capacity likely to be available to support the timely implementation of the strategy? How will it be funded and delivered?
- 17.2 Are the organisational mechanisms in place to ensure that joint working with other agencies (including adjoining local planning authorities) can be ensured where required?
- 17.3 In order for the plan to be found sound it must be effective. In order to test its effectiveness over the course of the plan period it must be capable of appropriate monitoring. Is the monitoring framework for each policy likely to be adequate? Are sufficient local targets identified and are they clear and capable of measurement, particularly over time? When and how will the monitoring be undertaken? Does the CS incorporate sufficient flexibility should any identified targets not be met?

- 17.4 Is the relationship between the CS and the forthcoming CIL Charging Schedule sufficiently clear? Is there sufficient flexibility in policy CS35 to address issues of viability?
- 17.5 What are the main risks to delivery; does the Council have an appropriate fall-back position; and is there sufficient flexibility to accommodate any unforeseen circumstances? What are the triggers for a review of the document?