



The Planning Inspectorate

Examination of the New Forest District (outside the National Park) Local Plan-Part 1: Planning Strategy

Inspectors' Matters, Issues and Questions

Kevin Ward BA (Hons) MRTPI

Caroline Mulloy BSc (Hons) DipTP MRTPI

Inspectors appointed by the Secretary of State

Matter 1-Procedural/legal requirements

Issue -Whether the Council has complied with the relevant procedural and legal requirements.

Plan preparation

- 1.1 Has the Local Plan been prepared in accordance with the Local Development Scheme in terms of its form, scope and timing?
- 1.2 Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?
- 1.3 Has the preparation of the Local Plan complied with the Statement of Community Involvement?

Sustainability Appraisal

- 1.4 How has the Sustainability Appraisal (SA) informed the preparation of the Local Plan at each stage and how were options considered?
- 1.5 How has the SA been reported?
- 1.6 Has the methodology for the SA been appropriate? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?

Habitats Regulations Assessment

- 1.7 How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?
- 1.8 Was the approach in accordance with recent judgement of the Court of Justice of the European Union (12 April 2018-Case C-323/17) which ruled that it is not appropriate to take account of measures intended to avoid or reduce the harmful effects of a plan or project on a European site at the screening stage as part of the HRA.
- 1.9 What were the relevant designated sites considered?
- 1.10 What potential impacts of the Local Plan were considered? What were the conclusions of the HRA and how has it informed the preparation of the Local Plan?
- 1.11 Have any concerns been raised and if so what is the response?

Other matters

- 1.12 Has the Council had regard to the specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
- 1.13 Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? Which?
- 1.14 How have issues of equality been addressed in the Local Plan?

Matter 2-Duty to Co-operate

Issue -Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan

Overall housing provision

- 2.1 Who has the Council engaged with in terms of overall housing provision and what form has this taken?
- 2.2 What are the inter-relationships with other authorities in terms of migration, commuting and housing markets?
- 2.3 How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN) and housing provision?
- 2.4 What is the basis for undertaking an assessment of OAN for the New Forest District and National Park areas, rather than the wider HMAs. Is this an appropriate approach?
- 2.5 How has the issue of unmet housing need from the National Park been addressed through co-operation?
- 2.6 Has the Council made every effort to engage with adjoining Authorities in terms of their potential to meet housing need on non-Green Belt land within their areas, thus avoiding/reducing the need for Green Belt land for housing in the District?
- 2.7 Does the overall provision being planned in the Local Plan have any implications for other authorities? If so, what are they and how have these been addressed?
- 2.8 What is the position of other authorities in terms of the planned level of housing in the District? What representations were submitted?
- 2.9 In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue?

Habitat Protection and Mitigation

- 2.10 Who has the Council engaged with in terms of habitat protection and mitigation and what form has this taken?
- 2.11 Which cross-boundary issues have been identified, what has been the outcome of co-operation and how have these issues been addressed?
- 2.12 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

The National Park

- 2.13 How has the Council engaged with the New Forest National Park Authority in the preparation of the Local Plan? What are the cross boundary issues requiring co-operation and how have these been addressed?

Site allocations

- 2.14 Which proposed site allocations raise cross boundary, strategic issues? What are these issues and who has the Council engaged with?
- 2.15 How have these issues been addressed, for example issues relating to proximity to the National Park and the effect on the function and integrity of the wider Green Belt where land is proposed to be removed from the Green Belt?
- 2.16 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Other strategic matters

- 2.17 Are there any other genuinely strategic matters as defined by S33A of the Planning and Compulsory Purchase Act 20014 (as amended)? If so, what are they?
- 2.18 If so, who has the Council engaged with? What has been the outcome of co-operation and how have these issues been addressed?
- 2.19 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Matter 3-The Spatial Strategy

Issue -Whether the spatial strategy is justified, effective and consistent with national policy

Relevant Policies: Policy 1, Policy 3 and Policy 4

- 3.1 Does the Local Plan adequately reflect the presumption in favour of sustainable development in national policy (Policy 1)?
- 3.2 What is the basis for the strategy for locating new development and the settlement hierarchy set out in Policies 3 and 4? What options were considered and why was this hierarchy chosen? Is the approach justified?
- 3.3 Are the towns set out at Policy 4 appropriately defined, what is the basis for them?
- 3.4 Are the main villages set out at Policy 4 appropriately defined, what is the basis for them? Should the former Fawley power station be treated as equivalent to a main village?
- 3.5 What is the scale of development actually planned in the towns (including existing commitments) and is this consistent with Policy 4?
- 3.6 What is the scale of development actually planned in the main villages (including existing commitments) and is this consistent with Policy 4?
- 3.7 Is the approach to development in small rural villages set out in Policy 4 appropriate and consistent with national policy?
- 3.8 Is the approach to development outside of the towns, main villages and small rural villages sufficiently clear? Is it appropriate and consistent with national policy?
- 3.9 Is the requirement for a net environmental gain in Policy 3 justified and consistent with national policy?

Matter 4-Objectively Assessed Need and the housing requirement

Issue -Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to Objectively Assessed Need and the housing requirement

Relevant Policies: Policy 5

- 4.1 The New Forest District falls within the three Housing Market Areas (Southampton, Bournemouth and Salisbury). What is the basis for undertaking an assessment of OAN for the New Forest District and National Park areas, rather than part of the wider HMAs. Is this an appropriate approach?
- 4.2 Was the methodology employed in the Objectively Assessed Need Report 2017 appropriate and does it provide a robust basis for establishing the OAN?
- 4.3 Is it justified in not using the 2014 subnational based population projections? Is the use of 10 year population trend based data justified as an alternative approach?
- 4.4 Are the assumptions regarding migration justified?
- 4.5 Are the assumptions regarding household growth justified?
- 4.6 What evidence is there in relation to future economic/jobs growth? How have economic/jobs growth forecasts and changes to working age population been taken into account?
- 4.7 Is the approach of considering whether the level of housing growth would merely act as a barrier to economic growth in the New Forest District justified? Should economic/jobs growth forecasts be factored in to the calculation of OAN?
- 4.8 How have market signals been taken into account? What do they show? What is the basis for the 15% uplift? Is this appropriate?
- 4.9 Given the scale of identified affordable housing need, should the OAN be increased to assist in delivering more? If so to what extent?
- 4.10 In overall terms, is the OAN of 10,420 for the Plan period (2016-36) or 521 dwellings per annum appropriate and justified? Is there a basis to arrive at an alternative figure and if so what?
- 4.11 Is the housing requirement figure of 10,500 for the plan period set out in Policy 5 appropriate and justified?
- 4.12 Is the approach to the housing requirement consistent with that for the provision of employment land and economic growth set out in the Local Plan?
- 4.13 What is the basis for the phased approach to annual average housing requirements in principle and in terms of the specific figures? Is this approach justified?

Matter 5-The Green Belt

Issue -Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy

Relevant Policies: Policy 12

N.B. This matter concerns the principal and overall approach to the Green Belt. Detailed matters relating to individual site allocations and the specific implications for the Green Belt are dealt with under Matter 11

- 5.1 What is the capacity to accommodate housing and employment development within the District on non-Green Belt land? How has this been assessed and is this robust?
- 5.2 How is this affected by the spatial strategy?
- 5.3 How is it affected by other constraints?
- 5.4 Have all opportunities to maximise the capacity on non-Green Belt land been taken including the potential to increase densities?
- 5.5 Is there realistic potential to accommodate some of the development needs of the District in other authority areas, so reducing the need to alter the Green Belt? How has this been assessed/investigated?
- 5.6 What was the methodology used in the 2016 Green Belt Study and was it appropriate?
- 5.7 What were the conclusions of that study in terms of the contribution of land parcels and broad areas towards the purposes of the Green Belt and potential alterations to the Green Belt? Are those conclusions robust and justified? How has the study informed the Local Plan and specifically proposals to alter the Green Belt to accommodate development needs?
- 5.8 Are there exceptional circumstances to alter the Green Belt in the District in principle? If so what are they?
- 5.9 Has consideration been given to the potential to identify safeguarded land? Should it be identified?
- 5.10 Is the wording of Policy 12 consistent with national policy in relation to the consideration of development proposals in the Green Belt? For example when it refers to "exceptional circumstances" and "landscape quality"?
- 5.11 Is Policy 12 effective and justified?

Matter 6-The Economy

Issue -Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to the economy

Relevant Policies: Policy 6, Policy 21, Policy 22, Policy 23 and Policy 24

Employment land

- 6.1 What is the evidence in relation to the need for additional employment land and what does it show? How have inter-relationships with other authorities in terms of economic growth and employment land provision been taken into account?
- 6.2 How does the Local Plan seek to provide for this need and what would be the total supply of employment land? Would this be adequate and provide for sufficient flexibility? How does the planned supply relate to past take up rates?
- 6.3 Does Policy 6 provide an appropriate strategic framework for economic growth? Is the policy justified, effective and consistent with national policy?

Employment development

- 6.4 What is the basis for the approach to the development of employment uses set out in Policy 21? Is it justified, effective and consistent with national policy?
- 6.5 What is the basis for the criteria in Policy 22? Is the policy justified, effective and consistent with national policy?

Marchwood Port

- 6.6 What is the basis for the approach to Marchwood Port set out in Policy 23? Is the approach to development on land at the Port sufficiently clear?
- 6.7 What are the potential adverse impacts of development at the Port and how would these be mitigated? Are the criteria in Policy 23 appropriate and how would other policies in the Local Plan be applied?
- 6.8 Overall, is Policy 23 justified, effective and consistent with national policy?

Dibden Bay

- 6.9 What is the basis for the approach to Dibden Bay set out in Policy 24? Is it appropriate to include a policy on this issue given that it would be likely to fall within the NSIP regime?
- 6.10 Overall, does Policy 24 and associated text provide an appropriate framework for development at Dibden Bay? Is the approach justified, effective and consistent with national policy?

Matter 7-Retail and other main town centre uses

Issue -Whether the approach to retail and other main town centre uses is justified, effective and consistent with national policy

Relevant Policies: Policy 25 and Policy 26

- 7.1 What evidence is there in relation to the need for additional retail and other main town centre uses? What does it show?
- 7.2 How does the Local Plan seek to accommodate any needs for such development?
- 7.3 How and when were the boundaries of the Town Centres, Primary Shopping Areas, Primary Shopping Frontages, Secondary Shopping Frontages and Local Shopping Frontages defined? Are these appropriate and consistent with definitions in national policy?
- 7.4 Is the approach set out in Policy 25 justified, effective and consistent with national policy?
- 7.5 What is the basis for the threshold of 1,000 sqm for an impact assessment and is this justified?
- 7.6 Are the criteria in Policy 26 sufficiently clear? In overall terms is the policy justified, effective and consistent with national policy?

Matter 8-Protecting the Environment

Issue-Whether the approach towards protecting the environment is justified, effective and consistent with national policy

Relevant Policies: Policy 2, Policy 10, Policy 13 and Policy 14

- 8.1 Does the approach set out in Policy 2 provide an effective basis to ensure that the statutory purposes of the New Forest National Park and the Cranbourne Chase Area of Outstanding Natural Beauty are fulfilled? Does the Policy adequately reflect the need to ensure that development outside the National Park and AONB do not adversely affect their setting?
- 8.2 In overall terms is Policy 2 justified, effective and consistent with national policy?
- 8.3 How has the presence of international nature conservation sites been taken into account in preparing the Local Plan and specifically in relation to potential site allocations?
- 8.4 Does Policy 10 provide an effective basis for mitigating the impacts of development on international nature conservation sites? Is the approach to the provision of natural recreational greenspace effective, justified and consistent with national policy? Is the threshold of 50 dwellings for the provision of natural recreational greenspace on or directly adjoining the site appropriate and justified?
- 8.5 In overall terms is Policy 10 justified, effective and consistent with national policy?
- 8.6 Is Policy 13 justified, effective and consistent with national policy?
- 8.7 Is Policy 14 justified, effective and consistent with national policy?

Matter 9-Housing Policies

Issue- Whether the housing policies are justified, effective and consistent with national policy

Relevant Policies: Policy 16, Policy 17, Policy 18, Policy 19 and Policy 20

Housing type, size and choice

- 9.1 What is the evidence base for the specific requirements in terms of house sizes set out in Fig. 6.1 within Policy 16? How would they affect viability? Are these requirements justified?
- 9.2 What is the basis for the specific requirements in terms of house types/tenures set out in part ii of Policy 16? How would they affect viability? Are these requirements justified?
- 9.3 In overall terms is Policy 16 justified, effective and consistent with national policy?

Residential accommodation for older people

- 9.4 What is the evidence in relation to needs for residential accommodation for older people?
- 9.5 Is the requirement in Policy 18 to provide self-contained homes to meet the needs of older people, including sheltered and extra-care housing on the strategic site allocations justified?
- 9.6 In overall terms is Policy 18 justified, effective and consistent with national policy?

Affordable housing

- 9.7 What is the evidence in terms of affordable housing need and what does it show?
- 9.8 What are the past trends in affordable housing in terms of completions and forms of delivery? How is this likely to change in future?
- 9.9 Is the site size threshold for seeking affordable housing in Policy 17 justified and consistent with national policy?
- 9.10 What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show and does it justify the percentages sought in parts i and ii of Policy 17?
- 9.11 What is the basis for the tenure mix set out in part iii of Policy 17 and is this justified?
- 9.12 Is the policy sufficiently flexible in relation to viability and the potential for off- site provision?
- 9.13 In overall terms is Policy 17 justified, effective and consistent with national policy?

Rural housing exception sites and community led housing schemes

- 9.14 What form of development by a community led housing group would be allowed for by Policy 20? What is meant by ancillary or related development? Would this approach be an exception to other policies and the broader approach to rural housing exception sites? If so, what is the justification for this?
- 9.15 What evidence is there in terms of the viability of rural housing exception sites? Is there a need for flexibility to allow for an element of market housing on such sites?
- 9.16 In overall terms is Policy 20 justified, effective and consistent with national policy?

Gypsies, Travellers and Travelling Showpeople

- 9.17 What is the evidence in terms of the need for additional provision? Was the methodology for the assessment appropriate and robust?
- 9.18 How and when will identified needs be met? Is this sufficiently clear? Is the approach to meeting needs set out in Policy 19 justified and consistent with national policy?

Matter 10-Other Policies

Issue- Whether policies relating to transport and travel, community services, infrastructure and facilities, safe and healthy communities, developer contributions, development standards and monitoring are justified, effective and consistent with national policy

Relevant Policies: Policy 7, Policy 8, Policy 29, Policy 31, Policy 34, Policy 35 and Policy 36

- 10.1 What is the background to Policies 7 and 31? Would they provide an effective basis to address transport and travel issues? Are they justified and consistent with national policy?
- 10.2 What is the basis for Policy 8? Would it provide an effective approach to the provision of and retention of community services, infrastructure and facilities which is justified and consistent with national policy?
- 10.3 Would Policy 29 provide an effective basis for safe and healthy communities? Is it justified and consistent with national policy?
- 10.4 How has the Local Plan addressed issues of air quality for example in relation to strategic site allocations?
- 10.5 How has the Local Plan addressed issues of flood risk for example in relation to strategic site allocations?
- 10.6 Is the approach to developer contributions set out in Policy 34 effective? Does it provide an appropriate level of flexibility in terms of the impact on the viability of development proposals? Is it justified and consistent with national policy?
- 10.7 How do the accessibility standards for new homes set out in Policy 35 compare with those required by Building Regulations? What is the evidence that justifies the need for the particular standards set out in part i of the policy? How has the effect of these standards on viability been taken into account?
- 10.8 What is the evidence in terms of the need for the higher water use efficiency standard set out in part ii of the policy? How has the effect of this standard on viability been taken into account?
- 10.9 In overall terms is Policy 35 effective, justified and consistent with national policy?
- 10.10 How will the implementation of the Local Plan be monitored? Would Policy 36 and the associated Monitoring Framework in Fig.9.1 provide for effective monitoring and are there clear mechanisms to address issues in a timely manner?

Matter 11a- Strategic site allocations: Totton and the Waterside

Issue-Whether the proposed strategic site allocations in the Totton and the Waterside area are justified, effective and consistent with national policy

Relevant Policies: Strategic sites 1-4

NB. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts and delivery etc.

Taking each of the following proposed strategic site allocations individually:

- Strategic Site 1: Land to the north of Totton
- Strategic Site 2: Land south of Bury Road, Marchwood
- Strategic Site 3: Land at Cork's Farm, Marchwood
- Strategic Site 4: The former Fawley Power Station

- 11a.1 What is the background to the site allocation? How was it identified and which options were considered?
- 11a.2 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 11a.3 What is the basis for the scale and mix of uses proposed? Is this justified?
- 11a.4 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk and the impact on the National Park etc.? Would policy safeguards and proposed mitigation be sufficiently effective?
- 11a.5 What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How would these be addressed?
- 11a.6 What is the background to the specific policy requirements? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 11a.7 Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
- 11a.8 How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 11a.9 What is the expected timescale and rate of development and is this realistic?

Matter 11b- Strategic site allocations: South Coastal Towns

Issue-Whether the proposed strategic site allocations in the South Coastal Towns area are justified, effective and consistent with national policy

Relevant Policies: Strategic sites 5-11

NB. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts and delivery etc.

Taking each of the following proposed strategic site allocations individually:

- Strategic Site 5: Land at Milford Road, Lymington
- Strategic Site 6: Land to the east of Lower Pennington Lane, Lymington
- Strategic Site 7: Land north of Manor Road, Milford on Sea
- Strategic Site 8: Land at Hordle Lane, Hordle
- Strategic Site 9: Land East of Everton Road, Hordle
- Strategic Site 10: Land to the east of Brockhills Lane, New Milton
- Strategic Site 11: Land to the south of Gore Road, New Milton

- 11b.1 What is the background to the site allocation? How was it identified and which options were considered?
- 11b.2 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 11b.3 What is the basis for the scale and mix of uses proposed? Is this justified?
- 11b.4 What are the conclusions of the Green Belt Study in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 11b.5 What would be the effect of developing the site on the purposes of the Green Belt?
- 11b.6 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk and the impact on the National Park etc.? Would policy safeguards and proposed mitigation be sufficiently effective?
- 11b.7 What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How would these be addressed?
- 11b.8 What is the background to the specific policy requirements? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 11b.9 Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?

- 11b.10 How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 11b.11 What is the expected timescale and rate of development and is this realistic?
- 11b.12 Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

Matter 11c- Strategic site allocations: Avon Valley and Downlands

Issue-Whether the proposed strategic site allocations in the Avon Valley and Downlands area are justified, effective and consistent with national policy

Relevant Policies: Strategic sites 12-18

NB. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts and delivery etc.

Taking each of the following proposed strategic site allocations individually:

- Strategic Site 12: Land to the south of Derritt Lane, Bransgore
- Strategic Site 13: Land at Moortown Lane, Ringwood
- Strategic Site 14: Land to the north of Hightown Road, Ringwood
- Strategic Site 15: Land at Snails Lane, Ringwood
- Strategic Site 16: Land to the north of Station Road, Ashford
- Strategic Site 17: Land at Whitsbury Road, Fordingbridge
- Strategic Site 18: Land at Burgate, Fordingbridge

- 11c.1 What is the background to the site allocation? How was it identified and which options were considered?
- 11c.2 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 11c.3 What is the basis for the scale and mix of uses proposed? Is this justified?
- 11c.4 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, nature conservation, landscape and countryside, heritage assets, flood risk and the impact on the National Park etc.? Would policy safeguards and proposed mitigation be sufficiently effective?
- 11c.5 What are the infrastructure requirements/costs and are there physical or other constraints to development including those from nearby land uses/proposed developments? How would these be addressed?
- 11c.6 What is the background to the specific policy requirements? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 11c.7 Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
- 11c.8 How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 11c.9 What is the expected timescale and rate of development and is this realistic?

In addition for:

- Strategic Site 12: Land to the south of Derritt Lane, Bransgore
- Strategic Site 13: Land at Moortown Lane, Ringwood

11c.10 What are the conclusions of the Green Belt Study in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?

11c.11 What would be the effect of developing the site on the purposes of the Green Belt?

11c.12 Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

Matter 12- The supply and delivery of housing land

Issue-Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy

Relevant Policies: Policy 5

- 12.1 What is the estimated total supply of new housing in the plan period 2016-2036 and how does this compare with the requirement?
- 12.2 What is the estimated total supply in the plan period from:
- a) Completions since 2016
 - b) Planning permissions
 - c) Other commitments
 - d) Proposed strategic site allocations
 - e) Sites to be identified in the Local Plan Part 2 or Neighbourhood Plans
 - f) Rural housing exception sites
 - g) Windfalls
- 12.3 What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic? How do they compare to previous rates?
- 12.4 How has flexibility been provided in terms of the housing land supply? Are there other potential sources of supply not specifically identified? Can this be specified?
- 12.5 In overall terms, would the Local Plan realistically deliver the number of houses required over the plan period?
- 12.6 Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF?
- 12.7 How would any shortfall since 2016 be dealt with?
- 12.8 What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2016?
- 12.9 Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?