



The Planning Inspectorate

Independent Examination of the Chiltern and South Bucks Local Plan

Inspectors' Matters, Issues and Questions Stage 1

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Introduction

Prior to the forthcoming Stage 1 Hearing sessions responses are invited from participants on the following Matters, Issues and Questions ('MIQs'). The MIQs are based on the Main Issues identified by the Councils, the *Inspectors' Initial Questions*¹ and other relevant issues raised by representors.

Further information about the Examination, Hearings and format of written statements is provided in the accompanying Guidance Note, which should be read alongside the MIQs.

¹ Document EXAM1

Matter 1 – Compliance with the Act and Regulations

Issue 1 – Duty to Cooperate

- Q1. The *Duty to Cooperate Statement*² confirms that Aylesbury Vale District Council has agreed to accommodate 5,725 dwellings from Chiltern and South Bucks. What is this figure based on, how has it been calculated and what alternatives were considered as part of the preparation of the Plan?
- Q2. Have the Councils approached other local authorities to assist in meeting any potential unmet housing and economic development needs?
- Q3. How will the Councils ensure that the proposed number of dwellings agreed with Aylesbury Vale District Council will be delivered? What mechanisms are in place should the relevant sites not come forward as expected?
- Q4. In response to the *Inspectors' Initial Questions* the Councils highlighted that Main Modifications are being sought to the *Vale of Aylesbury Local Plan* to delete policy criteria relating to the unmet needs of Chiltern and South Bucks.³ What is the latest position regarding the Vale of Aylesbury Local Plan, and what implications, if any, would this suggested change have?
- Q5. In response to the *Inspectors' Initial Questions*, it was confirmed that Slough Borough Council had approached Chiltern and South Bucks to accommodate some of their unmet housing needs. However, the "exact level of the shortfall needs to be clarified".⁴ What is the latest position? Has the amount of housing which cannot be accommodated in Slough been established? Is there agreement on how Slough's potential unmet needs will be accommodated?
- Q6. Paragraph 3.5.7 of the submitted Plan refers to the potential need to further consider the Green Belt boundary north of Slough in an early review of the Plan. Is this approach consistent with the PPG, which states that "*Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates...*"⁵
- Q7. What is the purpose of the *Wider Area Growth Study* which is being prepared on behalf of Slough Borough Council, South Bucks District Council and the Royal Borough of Windsor and Maidenhead? How does this relate to the strategic, cross-boundary matters of housing growth which have arisen during the preparation of this Local Plan?
- Q8. How are the Councils intending to consider and implement any findings from the *Wider Area Growth Study*?
- Q9. Have all the necessary Statements of Common Ground been prepared and do they cover the scope expected in the Planning Practice Guidance (the 'PPG')?⁶

² Document CSBLP12

³ Document EXAM2

⁴ Document EXAM2

⁵ Paragraph: 022 Reference ID: 61-022-20190315

⁶ Paragraph: 011 Reference ID: 61-011-20190315 to Paragraph: 015 Reference ID: 61-015-20190315

- Q10. How have the Councils cooperated with other relevant organisations, such as Buckinghamshire and Milton Keynes Natural Environment Partnership?
- Q11. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the National Planning Policy Framework (the 'Framework') and the PPG?

Issue 2 – Sustainability Appraisal ('SA')

- Q1. The *Inspectors' Initial Questions* asked how the scale and distribution of growth has been determined as part of the plan-making process and what alternative strategies have been considered as part of the SA. In response, the Councils confirmed that the *September 2019 SA Update*⁷ assessed five spatial options. This included:
- Do nothing;
 - Export all unmet housing need to Aylesbury and develop all suitable commitments;
 - Partially meet housing needs over the plan period, including using commitments and all suitable HELAA sites, and export the remaining unmet housing need to the Vale of Aylesbury;
 - Meet housing needs over the plan period, including using all sources of land and additional Green Belt releases as necessary, and exporting any remaining unmet housing need to the Vale of Aylesbury; and
 - Meet housing needs in full within Chiltern and South Bucks.

Part of the justification for not pursuing Option 5 (meeting all housing needs in Chiltern and South Bucks) is the constraints of the Green Belt and the Chilterns Area of Outstanding Natural Beauty ('AONB'). However, the Plan includes strategic development sites which require alternations to the Green Belt boundary, and, some residential development sites that fall within the AONB. How, therefore, did the Councils determine the scale of housing and economic development that would take place within the Plan area?

- Q2. The five options referred to above all relate to the scale of growth that will occur in Chiltern and South Bucks, comparing it with options for exporting unmet needs to Aylesbury Vale. Once the scale of development had been established within Chiltern and South Bucks, where does the SA consider the spatial distribution of this growth and test it against reasonable alternatives? I.e. where does the SA consider the geographic distribution of proposed new housing and economic development?
- Q3. Appendix B of the SA includes assessments for each of the 37 sites identified as 'reasonable alternatives'. What process did the Councils follow to determine which sites were taken forward into this stage of the assessment? In creating the list of 37 sites to be tested through the SA did the Council consider sites on a consistent and transparent basis?
- Q4. Were the sites chosen to be taken forward and tested as 'reasonable alternatives' based on an established, and tested, spatial strategy? Where is this set out?

⁷ Document CSBLP9

- Q5. Has there been a material change in circumstances since the latest iteration of the SA? If so, what implications does this have on the robustness of the assessment?
- Q6. In response to the *Inspectors' Initial Questions* the Councils have signed a Statement of Common Ground with Natural England and the City of London.⁸ Paragraph 4.3 states that the strategic allocation at Beaconsfield (Policy SP BP9) will be required to incorporate a suitable alternative natural greenspace ('SANG'). How has this been taken into account as part of the SA process and assessment of reasonable alternatives?
- Q7. Paragraphs 2 and 3 of the *September 2019 SA Update* estimates that the growth proposed as part of the Plan will increase carbon emissions by 16.6%. How has this been calculated, is it accurate and how has it been taken into account in shaping the Plan's strategy for growth? Why does it differ from the figure of 21% in the Regulation 19 version SA?
- Q8. Does the SA justify the policies in the Plan? Does it represent an appropriate strategy taking into account the reasonable alternatives available?

Issue 3 - Public Consultation

- Q1. Has public consultation been carried out in accordance with the Council's *Statement of Community Involvement*, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?
- Q2. Were adequate opportunities made available for participants to access and make comments on the Plan, and other relevant documents, in different locations?
- Q3. What was the justification for extending the period of public consultation at the Regulation 19 Stage? Were adequate opportunities provided for participants to make comments on the Plan?
- Q4. How were representations made at the Regulation 18 Stage taken into account? How did comments from representors help shape the preparation of the Plan?

Issue 4 – Local Development Scheme ('LDS')

- Q1. Has the Plan been prepared in accordance with the LDS?
- Q2. What is the justification for progressing a joint Chiltern and South Bucks Local Plan, as opposed to a new, composite Plan for Buckinghamshire?

Issue 5 – Habitats Regulations Assessment

- Q1. The *Habitats Regulations Assessment of the Chiltern and South Bucks Local Plan* ('HRA')⁹ states that increased recreational pressure has the ability to change the structure and function of habitats at the Burnham Beeches Special Area of Conservation ('SAC'). The greatest risk is posed from new residential development within 400m of the SAC. Elsewhere, new housing within 5.6km of the SAC is considered likely to have an impact on the integrity of the site from increased visitor pressure. The Addendum to the

⁸ Document CSBLP12.13

⁹ Document CSBLP32

Regulation 19 HRA Report¹⁰ states that there should be a presumption against any new development within 500m of the SAC. To ensure that the Plan is justified, should references throughout the Plan therefore refer to the 500m distance?

- Q2. In response to the *Inspectors' Initial Questions* the Councils confirm that a mitigation strategy is in preparation to mitigate against the impacts of additional recreational disturbance on the Burnham Beeches SAC. What is the current position regarding the mitigation strategy and when is it expected to be completed?
- Q3. What are the likely implications of the necessary mitigation strategy on the policies and allocations in the submitted Plan? For example, where the provision of SANGs will be required, how has this been considered from a deliverability and viability perspective?
- Q4. The Councils also confirm that further sampling and modelling work is being undertaken and assessed by Natural England, the City of London, Buckinghamshire County Council and the Councils own consultants. What is the purpose of this additional modelling work and when will the results be available?

Issue 6 – Strategic Flood Risk Assessment ('SFRA')

- Q1. Do any of the sites allocated for development in the Plan fall within Flood Zones 2 or 3 (or have significant areas falling within Flood Zones 2 or 3)? If so, are the allocations and policies consistent with paragraph 157 of the Framework which states that Local Plans should apply a sequential, risk-based approach to the location of development, taking into account current and future impacts of climate change, to avoid where possible flood risk to people and property?
- Q2. How has the Council taken a sequential approach to identifying sites for new development?
- Q3. Where land allocated for development does fall within areas at risk of flooding, what measures does the Plan include to ensure that any residual risks are appropriately managed?

Issue 7 – Public Sector Equality Duty ('PSED')

- Q1. 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?

¹⁰ Document CSBLP33

Matter 2 – Objectively Assessed Housing and Employment Needs

Issue 1 – Housing Needs

- Q1. In response to the *Inspectors' Initial Questions* the Councils confirmed that the Plan should have a strategic policy which sets out the housing requirement and how this need will be met. Is a Main Modification required for effectiveness and consistency with paragraph 20 of the Framework?
- Q2. In determining the housing requirement, has the Local Housing Need ('LHN') assessment been carried out correctly, and conducted using the standard method as required by the Framework and the PPG?
- Q3. Where plans cover more than one area, the PPG states that it will be for the relevant strategic policy-making authority to distribute the total housing requirement across the plan area.¹¹ How have the LHN assessments for Chiltern and South Bucks been distributed across the plan area? How was this decided?
- Q4. How has the LHN figure been translated into a housing requirement for the Plan period? For effectiveness and consistency with paragraph 65 of the Framework, should the Plan include a specific policy setting out the housing requirement for the whole plan area?
- Q5. The PPG states that the standard method can be used to calculate the *minimum* annual local housing need figure. Should the housing requirement be expressed as a minimum, and is it a gross or net figure?
- Q6. The PPG also states that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It confirms that there will be circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. Have the Councils considered whether the need for housing is higher in Chiltern and South Bucks, having particular regard to issues around affordability? How have these considerations informed the plan-making process?
- Q7. What is the justification for including an additional 10% to account for the potential non-delivery of homes from the Vale of Aylesbury Local Plan?
- Q8. Does the Plan set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 65 of the Framework?

Issue 2 - Affordable Housing Needs

- Q1. What is the annual net need for affordable housing? For clarity to decision-makers, developers and local communities, and consistency with the Framework, should the need for affordable housing be set out in a strategic policy?
- Q2. Has the affordable housing need been correctly established, and is it based on up-to-date information? How does it compare to the LHN?

¹¹ Paragraph: 013 Reference ID: 2a-013-20190220

- Q3. What is the justification for requiring at least 40% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?
- Q4. How does this compare to the identified need?

Issue 3 – Employment Needs

- Q1. In determining the need for employment land over the plan period, how has the Council considered:
- Employment forecasts and projections (labour demand);
 - Demographic assessments of future needs (labour supply);
 - Past take-up of employment land, for general industrial purposes and strategic warehousing; and
 - Consultation with relevant organisations and local business groups?
- Q2. Based on the answers to Question 2, how much additional employment land is required over the plan period?
- Q3. Should the Plan set out the requirement for employment land in the same way as it does for housing?
- Q4. In planning to deliver 56,000 square metres of economic floorspace is Policy SP EP4 justified and positively prepared? How does it relate to the figures in paragraph 6.6.7 of the submitted Plan?
- Q5. How does this take into account the availability of employment land elsewhere within the functional economic market area?

Matter 3 – Spatial Strategy

Issue 1 – Distribution of Growth

- Q1. How did the Councils determine the level of growth between the administrative areas of Chiltern and South Bucks? Does the level of growth proposed in each area reflect the housing need for both authorities?
- Q2. Paragraphs 8.9-8.10 of the Councils response to the *Inspectors' Initial Questions* states that in exploring options for growth, the Councils focussed on:
- A more efficient use of land;
 - Extensions to principal settlements; and
 - Green Belt release close to train stations.
- How has the distribution of housing and economic development proposed in the Plan responded to these development options?
- Q3. Does the Plan adequately set out an overall strategy for the pattern, scale and quality of development as required by paragraph 20 of the Framework? Is this sufficiently clear to decision-makers, developers and local communities?
- Q4. Does the Plan identify the Principal Settlements where the Councils have sought to focus development?
- Q5. How did the Councils decide on the scale and level of growth attributed to the towns and villages in the Plan? For example, why do the allocations in the Plan propose significantly more new dwellings in Beaconsfield than Amersham? What was the process and what alternative strategies were considered?
- Q6. What is the justification for the scale of development proposed on individual sites at Beaconsfield and Chesham? Why does the Plan seek to allocate large, single allocations, rather than several smaller sites in and around the towns?
- Q7. Is the spatial strategy and distribution of development consistent with paragraph 103 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are, or can be made sustainable?
- Q8. What role have the Councils played in the spatial distribution of development in the emerging Vale of Aylesbury Local Plan? Are specific sites identified in the Vale of Aylesbury Local Plan to meet the unmet needs from Chiltern and South Bucks, and if so, are they located in areas close to where the need arises?
- Q9. Under the heading 'Strategic Context', section 3.6 of the Plan refers to strategic plans and projects which may affect the plan area. Amongst others this includes the Oxford-Cambridge Arc, proposals for a third runway at Heathrow and the Western Rail Link. How have these projects been taken into account as part of the Plan's preparation?
- Q10. Is the spatial strategy justified? Does it represent an appropriate strategy when considered against the reasonable alternatives available?

Issue 2 – Location of New Development

- Q1. Is it clear to decision-makers, developers and local communities where new housing and economic development will be permitted? Is the Plan effective in this regard?
- Q2. How would a decision-maker react to a proposal for new housing or economic development within a settlement inset from the Green Belt?
- Q3. Does the Plan seek to take the same, or a different approach to new development within towns and villages inset from the Green Belt? For example, would a decision-maker consider the principle of development differently if it was located in Beaconsfield, as opposed to Botley and Ley Hill?

Matter 4 – Revision of Green Belt Boundaries and Development in the Green Belt

Issue 1 – Principle of Green Belt Release

Reasons for proposed boundary changes and capacity of existing urban areas

- Q1. Paragraph 11 of the Framework states that plans should apply a presumption in favour of sustainable development. Amongst other things, for plan-making this means that strategic policies should provide for objectively assessed needs for housing and other uses unless the applications of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. In response to the *Inspectors' Initial Questions* the Councils refer to constraints such as the Burnham Beeches SAC, the Chilterns AONB and areas of the Green Belt as reasons for not meeting the objectively assessed needs of the area in full in Chiltern and South Bucks.

However, the Plan does include new development within the Green Belt and the Chilterns AONB. How, therefore, did the Councils determine the amount of housing and employment development which is proposed to be released from the Green Belt?

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 137 of the Framework states that the strategic policy-making authority should be able to demonstrate that it has examined full all other reasonable options for meeting its identified need for development. This includes whether the strategy:

- a) Makes as much use as possible of brownfield sites and underutilised land;
 - b) Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations will served by public transport; and
 - c) Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need for development.
- Q2. How have the Councils made as much use as possible of brownfield sites and underutilised land and buildings in existing urban areas? How has the capacity of the existing urban areas to accommodate new development been established? Is the evidence in this regard accurate and up-to-date?
- Q3. What is the capacity of the existing urban areas to absorb additional housing and employment growth?
- Q4. How have the figures in the updated *Settlement Capacity Study* been derived? What methodology did the Councils use to consider the potential for existing settlements to meet the identified need for new housing and economic development?
- Q5. How does the Plan seek to optimise the density of development in existing urban areas?

- Q6. Have the Councils examined fully all other reasonable options for meeting the identified need for development outside the Green Belt, as required by paragraph 137 of the Framework?

Green Belt assessment methodology

- Q7. After following the process referred to above, how did the Councils decide where alterations would be made to Green Belt boundaries? Did the Councils look first at certain settlements, such as the Principal Settlements referred to in the SA, or on sites put forward through consultation?
- Q8. How were the results from the *Green Belt Assessment Part 1*?¹² taken forward and how were sites considered further? Were potential sites for development identified in the Part 1 Assessment?
- Q9. How does the *Part 2 Green Belt Assessment*¹³ build on the conclusions of the Part 1 Assessment? How were the findings from the Part 1 Assessment used to determine which sites to assess in more detail?
- Q10. How do the proposed Green Belt revisions align with the spatial strategy for the area? How will they promote sustainable patterns of development? For example, were settlements scored on their sustainability merits to first establish whether they represented an appropriate location for new development, having regard to accessibility to services or public transport provision?
- Q11. Why is the Green Belt proposed to be altered in some settlements (such as Amersham, Beaconsfield and Chesham) but not others (such as Gerrards Cross)?
- Q12. Are the revised boundaries capable of enduring in the long term, beyond the plan period?

Compensatory Improvements to remaining Green Belt land

- Q13. Paragraph 138 of the Framework states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. In response to the *Inspectors' Initial Questions* the Councils included a table of compensatory measures for each allocation. This includes, amongst other things, the retention and improvement of landscaping on each site, and the provision of links to existing public rights of way. However, how will improvements be achieved to the environmental quality and accessibility of remaining Green Belt land, especially where this may fall within separate ownership?

Exceptional Circumstances

- Q14. In principle, do the exceptional circumstances, as required by paragraphs 136-139 of the Framework, exist to justify revisions to the Green Belt boundary to provide for objectively assessed needs for housing and employment land?

¹² Document CSBLP15.7

¹³ Document CSBLP15.3

Issue 2 – Boundary Changes

- Q1. Does the Plan adequately identify the proposed revisions to the Green Belt boundary? Are the revisions clear to decision-makers, developers and local communities?
- Q2. In response to the *Inspectors' Initial Questions* the Councils confirmed that in some cases the area of land proposed to be removed from the Green Belt is larger than the corresponding allocation. In some cases, this is to act as a buffer, or to provide a more logical boundary based on clearly defined features. However, is it clear to decision-makers, developers and local communities what these areas will be used for? If removed from the Green Belt, will the principle of additional development be acceptable?
- Q3. Are there any sites or parcels of land where revisions to Green Belt boundaries are proposed, but which are not needed to meet housing or employment land requirements?
- Q4. Are any new areas of Green Belt proposed? If so, what are the exceptional circumstances which justify their inclusion and are they set out in strategic policies, as required by paragraph 135 of the Framework?

Issue 3 – Villages Inset from the Green Belt

- Q1. What is the justification for removing those villages from the Green Belt listed under Policy SP PP1? Is the approach consistent with paragraph 140 of the Framework?
- Q2. What is the justification for removing Denham from the Green Belt, including areas to the north which the *Review of Settlements within the Green Belt*¹⁴ describes as a traditional Green Belt village with properties set within open grounds with views of open land beyond?
- Q3. What is the justification for removing Jordans from the Green Belt? As a result of the proposed alterations to the Green Belt boundary will Jordans and Seer Green become a single, connected urban area to the south of the village?
- Q4. What is the justification for removing three separate areas of land from the Green Belt at Little Kingshill?

Issue 4 – Green Belt Villages

- Q1. What is the justification for identifying the boundaries of 'Infilling Villages' on the Policies Map?
- Q2. What criteria did the Councils use to determine whether a village was identified under Policy DM PP1? Was the process robust, accurate and transparent?
- Q3. Is the inclusion of Bellingdon justified under Policy DM PP1? Is the settlement clearly identifiable as a 'village'?
- Q4. Is the inclusion of Chartridge justified under Policy DM PP1? Is the settlement clearly identifiable as a 'village'?

¹⁴ Document CSBLP15.5

- Q5. What is the justification for including properties off Latimer Road as part of the village of Chenies?
- Q6. Is the inclusion of Penn justified under Policy DM PP1? Is the settlement clearly identifiable as a 'village'?
- Q7. Are the criteria for assessing infilling proposals consistent with paragraph 145 of the Framework?

Matter 5 – Residential and Employment Site Allocations

Issue 1 – Residential Site Allocations Methodology

- Q1. Is the approach taken to the assessment and selection of allocated residential sites, as set out in response to the *Inspectors' Initial Questions*, justified? Does the submitted evidence demonstrate that the sites have been selected based on a robust, consistent and objective approach?
- Q2. How was the scale and spatial distribution of allocations determined? For example, why do some settlements have allocations, but others do not? How were the allocations informed by the spatial strategy of the Plan?
- Q3. Has the site selection process for the residential site allocations been based on sound process of Sustainability Appraisal and the testing of reasonable alternatives? Are the reasons for selecting the preferred sites and rejecting others clear and justified? Do the reasons given in the SA and other evidence available comprehensively and consistently explain why the site allocations were selected or rejected?
- Q4. What is the justification for excluding sites in the Green Belt from the *Housing and Economic Land Availability Assessment Update* (January 2020) (HELAA)?¹⁵ Is the approach consistent with guidance in the PPG?
- Q5. If sites were discounted at the first stage of the HELAA, how did the Councils ensure that the allocations in the Plan are justified and appropriate having regard to reasonable alternatives? How did the Councils ensure that sites put forward for allocation in the Green Belt were assessed on a consistent and transparent basis?
- Q6. Does the Plan identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, as required by paragraph 68 of the Framework?
- Q7. How have the constraints of each site been taken into account and any necessary mitigation been considered as part of the process of allocating land for housing? In particular, how have the Councils considered and assessed the impact of development on transport infrastructure, air quality, heritage assets, drainage, schools and health care provision? Where is this set out?
- Q8. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?
- Q9. Are all sites viable? How has viability been considered as part of the preparation of the Plan?
- Q10. For the larger, mixed-use allocations, how was the range of uses determined?

¹⁵ Document CSBLP19.01

Issue 2 – Employment Site Allocations Methodology

- Q1. Is the methodology for the assessment and selection of the sites for development set out in the Employment Site Appraisal documents¹⁶ and *Economic Development and Employment Topic Paper* (December 2019)¹⁷ justified? Have the sites been selected using an appropriate methodology?
- Q2. How was the spatial distribution of employment allocations determined? How were the allocations informed by the spatial strategy of the Plan?
- Q3. Has the site selection process for the employment site allocations been based on sound process of Sustainability Appraisal and the testing of reasonable alternatives? Are the reasons for selecting the preferred sites and rejecting others clear and justified? Do the reasons given in the SA and other evidence available comprehensively and consistently explain why the site allocations were selected or rejected?
- Q4. In the Council's response to the *Inspectors' Initial Questions*, is the approach taken to the allocations for new office developments consistent with national planning policy? What evidence is available to support a sequential approach to the assessment and selection of sites in accordance with Paragraph 85 of the Framework?
- Q5. Is the amount of employment land to be accommodated on each of the sites allocated justified and effective? How has the development potential or yield for each site been arrived at? What safeguards are there that the development potential of each allocation will be realised?
- Q6. Are all sites viable? How has viability been considered as part of the preparation of the Plan?
- Q7. How have the constraints of each site been taken into account and any necessary mitigation been considered as part of the process of allocating land for housing? In particular, how has the Council considered and assessed the impact of development on transport infrastructure and air quality? Where is this set out?

¹⁶ Documents CSBLP23-24

¹⁷ Document EXAM4