

Hastings Local Plan, Development Management Plan Examination

Matter 6: Implementation and Monitoring

Prepared November 2014

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Tel: 01424 451098 Email: fplanning@hastings.gov.uk



MATTER 6: IMPLEMENTATION AND MONITORING

Matter 6: Whether, bearing in mind the content of the Hastings Planning Strategy, the Plan provides satisfactorily for the delivery of development, particularly its required infrastructure for public transport and other services, and convincingly demonstrates adequate monitoring of its provision and measures designed to rectify and shortcomings.

General response

6. Yes – we believe so. One of the main purposes of the Development Management Plan (DMP) is to implement the housing and employment strategy of the adopted Hastings Planning Strategy through the timely delivery of allocated housing and employment sites throughout the plan period. To be delivered in a sustainable way this will require not only delivery of growth but also the timely provision of necessary infrastructure to support that growth. The Borough Council is confident that the required infrastructure will be in place to achieve this (please see response to question 6.2 below). Further the Council has a comprehensive system in place for monitoring the delivery of both the Strategy and the DMP and measures in place to identify and rectify any shortcomings (see 6.6 below).

6.1 Has there been an adequate assessment of the quality and capacity of infrastructure for transport, water supply etc as required by the Framework paragraph 162?
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- 6.1.1. Yes. Statutory bodies, service providers and public sector bodies have been very closely involved in the preparation of the DMP. East Sussex County Council (ESCC) has particularly assisted the Borough Council in assessing the quality and capacity of the infrastructure needed to deliver the Plan. The Statement of support submitted to the examination by Mr J. Wheeler of ESCC (Rep 2144 – East Sussex County Council) confirms this. Other key infrastructure providers in areas identified in paragraph 162 of the NPPF (Library reference HBC/DMP/67) e.g. The Environment Agency, Education Authority, Southern Water, English Heritage, Natural England, EDF Energy, have all been consulted at key stages of Plan preparation and have contributed to the updating of the Infrastructure Delivery Plan (IDP) (Library reference HBC/DMP/13). The IDP has been produced to an agreed county wide format for all Local Plans in East Sussex and identifies what is required, by when and by whom in terms of provision. This process has not resulted in any overriding quality or capacity issues being identified that would prejudice the implementation of the DMP and the growth allocations shown within it.
- 6.1.2. The Council is therefore satisfied that the processes that it has followed have ensured that an adequate assessment of the quality and capacity of relevant infrastructure has been undertaken, as required by the NPPF. Details of identified infrastructure requirements can be found in the recently updated IDP. This takes account of the need for strategic infrastructure including that which is jointly supporting growth in the neighbouring District (Rother) but does not identify any nationally significant infrastructure required in Hastings. In this respect we would also refer to the supporting submissions made by Mr Marlow on behalf of Rother District Council (Rep 0467 – Rother District Council) and particularly with regards to

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the provision of the Bexhill-Hastings Link Road and other key transport improvements such as the Queensway Link.

- 6.1.3. Southern Waters' engagement with the process and comments received from them have enabled specific references to be made within a number of site allocation policies regarding the need to provide connections to sewerage and water supply to nearest points of adequate capacity and as advised by Southern Water examples of this approach are contained within Policies MBL1(ix), SH1(xiii), SH2(viii), FB1(xii) and LRA2(xi).

6.2 Is there a reasonable prospect of the required infrastructure being in place throughout the plan period to provide for the proposed development? Are the transport proposals sufficiently sustainable?

- 6.2.1. Yes. The Borough Council considers that there is a reasonable prospect of the required infrastructure being in place throughout the plan period to provide for the proposed development. Indeed a number of key schemes such as the Bexhill-Hastings Link Road have successfully been awarded significant Government funding and ESCC has also confirmed funding for this key project. Additional monies have been secured through the Growth deal funding and via the Local Enterprise Partnership (LEP). Again we refer to the County Council's supporting statement and that from Mr J Shaw of Sea Change (See appendix 1 of the Council's response to Matter 3 - HBC/5) which confirms this. The Schedule to the IDP identifies all of the key infrastructure required to implement the Plan. It is a significant benefit that the main piece of infrastructure critical to delivering the Plan - The Bexhill - Hastings Link Road – is securely funded and already under construction. There are no other identified infrastructure requirements in the IDP that would preclude the implementation of the Plan as a whole. They are mainly locally required measures that would impact on the development of one or two allocation sites in the plan and where these localised complimentary measures such as junction improvements will be secured through the development management/Section 106 process. The provision of the gas, water and electricity infrastructure necessary to secure development is not an issue because it will be developer funded. The main areas identified in the Schedule to the IDP where 100% of funding has not yet been fully secured are in education, transport and coastal defences. However in looking at the 15 year period of the Plan a substantial percentage of necessary funding for the key transport schemes – Link Road, Queensway Link, has already been secured and work on delivery is now evident on the ground or through submitted applications.
- 6.2.2. It has been previously indicated in 6.1 above that East Sussex County Council (ESCC) has worked closely with the Borough Council in the preparation of the Development Management Plan (DMP) and the Infrastructure Delivery Plan (IDP). The County Council has responsibility for education and transport and the supporting statement from Mr J. Wheeler, Infrastructure Manager with ESCC, also submitted sets out the funding position in these two areas.
- 6.2.3. The Coast and Flood protection work identified as necessary on the seafront will require DEFRA funding, in competition with other coastal authorities. This bidding process is however a 25 year programme and there is a realistic prospect that,

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having funded the necessary surveys, DEFRA will make funding available over the course of this period.

- 6.2.4. It can therefore be concluded that there are no “show stoppers” that would prejudice the overall implementation of the DMP. The Council is confident that the necessary infrastructure has the capacity to deliver or can be delivered in timely fashion to implement the Plan. The situation will however be monitored and the IDP updated at regular intervals as required by Policy C11 of the Hastings Planning Strategy (Library reference HBC/DMP/22).
- 6.2.5. Sustainable transport, particularly walking and cycling, is a key component of the DMP, furthermore Policy T3 of the adopted Planning Strategy advocates the promotion and increased use of sustainable forms of transport. Policy DM4 of the DMP builds on this. Sub paragraph (b) requires the enhancement and promotion of public transport provision and pedestrian and cycle access and sub paragraph (c) requires the inclusion of non-car based modes of transport within site allocation layouts. These requirements will be applied to all development proposals and can thus deliver sufficiently sustainable transport solutions to help support growth.
- 6.2.6. In addition a significant number of site specific policies include a requirement to provide walking and cycling links to neighbouring development to improve connectivity. Typical examples are Policy LRA1(x) Holmhurst St Mary, Policy FB1(x) The Grove School and Policy FB4(viii) Former Westerleigh School. Where appropriate, site policies also require the provision of specific elements of sustainable transport infrastructure. By way of example Policy FB2(x) Former West St Leonards Primary School requires the development to accommodate a bus lane on Bexhill Road and Policies HTC6(vi) Priory Quarter, Havelock Road and CV01(vii) Victoria Avenue require the safeguarding of land to enable the implementation of the strategic cycle network. The IDP itself is a “living document” and in support of the DMP, the Schedule to the updated IDP (Library reference HBC/DMP/13) identifies a number of projects to improve accessibility for bus users, walkers and cyclists, which it is intended to implement during the Plan period.
- 6.2.7. The Council therefore considers that the transport proposals in the DMP with their emphasis on non-car modes of travel to be sufficiently sustainable and to accord with the objectives of the Framework that address such matters.

<p>6.3 Is there any prospect of park and ride scheme(s) Is this a matter which has been discussed with relevant bodies.</p>
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- 6.3.1. The potential for a Park and Ride scheme in Hastings is discussed in paragraphs 11.25 to 11.27 of the adopted Hastings Planning Strategy. This identifies three criteria that are necessary for a successful Park and Ride scheme – it would need to generate a significant cost/time advantage to users and would generally work well where there is limited town centre parking and where car parking pricing discourages accessing town centres by car. The conclusion was reached in the Planning Strategy that these criteria could not easily apply in Hastings and that effective management of car parking would be the first priority. It was however indicated that if during the plan period a proven need was identified proposals for Park and Ride then this would

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be considered dependent on a number of conditions being met. It is not considered that a proven need exists at the present time. ESCC submitted statement provides more detail on this issue.

- 6.3.2. The provision of Park and Ride facilities in Hastings has been discussed with East Sussex County Council, as Transport Authority on a number of occasions, in the context of the preparation of Local Transport Plans (LTP). Their provision does not however form part of the overall transport strategy for Hastings in the County Council's agreed LTP 3 - 2011 to 2026. (Library reference HBC/DMP/99).
- 6.3.3. To make optimum use of car parking facilities within the Borough the Council is installing an intelligent signage system to help direct people to car parks where there are spaces available. Current evidence suggests that there is rarely, if ever, need for additional parking space but rather that visitors especially tend to gravitate towards the seafront car parks. This system should help alleviate any perceived local parking difficulties.

6.4 Does the evidence base convince that there is, or will be, sufficient energy resource including gas, electricity and water, to support the scale and distribution of the envisaged growth?

- 6.4.1. As part of the evidence base for the Development Management Plan, the Council has updated its Infrastructure Delivery Plan (IDP) (Library reference HBC/DMP/13), which was first prepared in 2012. As a basis for the update, over 30 key infrastructure bodies, including those responsible for gas, water and electricity, were consulted to establish whether they had sufficient energy resources to serve the various land use allocations in the DMP and what further infrastructure requirements they might have.
- 6.4.2. The National Grid has a statutory duty to develop and maintain an efficient and co-ordinated transmission system of electricity and gas supply across the country. Its response to the consultation was that specific development proposals within the area are unlikely to have a significant effect upon National Grid's gas and electricity transmission infrastructure and that it is unlikely that the proposed extra growth will create capacity issues for National Grid given the scale of these transmission networks. National Grid concluded by saying that its existing networks should be able to cope with any additional demands.
- 6.4.3. Scotia Gas Networks, who are responsible for managing and maintaining gas supplies to Hastings, responded by saying that there are currently no specific capacity issues in Hastings, and that any new development will be assessed and where necessary the gas system reinforced. Scotia Gas Networks also have an ongoing annual mains replacement programme to decommission iron gas mains and part of this programme is likely to involve significant investment in Hastings.
- 6.4.4. The electricity distribution company for the area is EDF Energy Networks. In its representation on the DMP the Company has advised that the Office of Gas and Electricity Markets (Ofgem) do not specifically allow the company to invest in infrastructure ahead of need. When new development proposals come forward the EDF Energy Projects Gateway Team will examine the proposals and provide an economic design for connection. EDF did not highlight any capacity problems.

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- 6.4.5. Southern Water provides water and sewerage services in Hastings. The Company welcomed the early consultation on the location and scale of development in the Local Plan. Southern Water had originally undertaken an assessment of all of the sites in the Council's Strategic Housing Land Availability Assessment (SHLAA) and indicated that the adopted Hastings Planning Strategy, together with the DMP, when adopted, will inform its investment planning and provide the evidence and certainty required to support investment and bidding proposals to OFWAT. No significant capacity issues were identified.
- 6.4.6. It can therefore be concluded that whilst it is likely that further local investment in gas, electricity and water infrastructure will be required in Hastings to service sites allocated in the DMP for housing and other growth, none of the service providers have identified overriding capacity problems with water, gas or electricity supply in meeting the scale of growth proposed in the Planning Strategy and the DMP. It can therefore be concluded that the evidence base clearly demonstrates that there are no overriding problems with the availability of energy resources to support the levels of development proposed in the DMP.

6.5 Is the risk of flooding and/or coastal erosion a matter of concern, and how could any such risk be reduced or eliminated?

- 6.5.1. The risk of flooding is a concern in Hastings and the potential risk is likely to increase with climate change. In response to these concerns, the Council specifically commissioned a Strategic Flood Risk Assessment in 2008, which forms part of the Evidence Base for the adopted Hastings Planning Strategy and the emerging Development Management Plan (DMP Library reference HBC/DMP/34 A-M). The Assessment concluded that the two sources of flooding likely to have the greatest impact in terms of extent and severity were the sea and the watercourses.
- 6.5.2. Work undertaken by the Environment Agency prior to 2008 has significantly reduced the risk of tidal flooding in the Bulverhythe Area of the Borough but other areas along the seafront are still vulnerable, particularly the town centre. Bulverhythe is however also vulnerable to flooding because of a combination of other factors including ground water, surface water run-off and tidal locking. It is the only part of the Borough to have a formal Flood Plan. The Coombe Haven and associated streams also have the potential to cause extensive flooding. This is however less frequent and mostly confined to unoccupied areas (floodplains).
- 6.5.3. It is unrealistic to expect that all flood risk in Hastings can be eliminated. In times of austerity the cost of doing so would be prohibitive and could have undesirable environmental and other consequences, particularly for the seafront area. Nevertheless, the work to combat coastal erosion described below will help reduce coastal flooding.
- 6.5.4. There is however much that Local Plans can do to seek to reduce the risk. The Council's overall planning strategy for tackling flood risk is set out in Policy SC7 of the Hastings Planning Strategy. This firstly supports the development of sites which are not liable to flood or would increase the risk of flooding elsewhere; secondly adopts a risk based sequential approach in determining the suitability of land for

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development; thirdly requires developers to particularly address flood risk in areas of highest risk including by requiring the use of Sustainable Urban Drainage Systems (SUDS).

- 6.5.5. In accordance with this overall strategy, the Council engaged specialist consultants AECOM in December 2012 to undertake a Sequential Test of all of the sites proposed for allocation in the DMP (Library reference HBC/DMP/157). The results of this study were validated and endorsed by the Environment Agency and an Addendum added in 2014. (Library reference HBC/DMP/168) This resulted in a number of sites of particularly high flood risk being removed, from earlier iterations of the Plan particularly in the Bulverhythe area.
- 6.5.6. Hastings Borough Council has also prepared a Surface Water Flood Management Plan (2011) in response to previous flooding incidents. This includes an action plan to deliver agreed options and recommendations such as the installation of SUDS. The use of SUDS can play a significant role in reducing flood risk and is particularly important in Hastings where the Surface Water Management Plan identified that with climate change surface water flooding is likely to increase.
- 6.5.7. Various measures to combat climate change can also help to reduce the risk of flooding. The NPPF at section 10, paragraphs 93-106, particularly advocates that Local Planning Authorities should adopt measures such as those contained in Policies SC3 to SC6 of the adopted Hastings Planning Strategy, which will be applied, where appropriate, to the sites allocated in the Development Management Plan to help meet the challenge of climate change, flooding and coastal change.
- 6.5.8. Coastal erosion is also a concern in Hastings and St Leonards, given the length of coastline within the Borough. The Council is the authority responsible for coast protection, except for the Bulverhythe area, which is the responsibility of the Environment Agency. Once again, it is unrealistic in a budgetary sense, to expect that all coastal erosion in Hastings can be eliminated - rather it is a matter of prioritising and policy response. The Council's South Foreland to Beachy Head Shoreline Management Plan (DMP Library ref HBC/DMP/89) adopts a policy of no active intervention for the section of coast between Fairlight Cove and Hastings thus allowing for natural retreat. For this and other reasons the DMP does not allocate any land for development in this area.
- 6.5.9. The long-term policy for the remainder of the seafront is to hold the line. The risk of coastal erosion can best be reduced by physical works, but these are expensive and require Government funding. A Department for Food and Rural Affairs (DEFRA) funded survey of coast defence assets in Hastings was completed in 2012. As a result a maintenance and replacement programme for 25 years is in place. Regional Flood and Coastal Committee funding has also been obtained to design enhanced protection for the Harbour Arm and two additional rock groynes at Carlisle Parade. DEFRA funding will be sought for these works. Further details can be found in the updated IDP.
- 6.5.10. In conclusion the DMP assists in reducing the risk of coastal erosion by not permitting development that would exacerbate existing problems and by tackling climate change in the ways outlined above.

MATTER 6: IMPLEMENTATION AND MONITORING**6.6 Are the various indicators and targets sufficiently precise? Does the Council have an effective monitoring system in place? What provisions are there for getting the strategy of the Plan back on track should such remedial action be required?**

- 6.6.1. Section 4 on Implementation and Monitoring of the DMP (at pages 216-220) sets out a detailed set of indicators and targets for monitoring the policies of the Plan together with sources for the relevant information. These have been carefully chosen for their relevance and measurability and the Council considers that they are sufficiently precise and targetted to provide for the effective monitoring of the Plan - these are linked within the tables to each of the Strategic Objectives of the Planning Strategy. Part 6 (pages 95-102) of the adopted Hastings Planning Strategy also contains a comprehensive range of key indicators and targets.
- 6.6.2. The Council has an effective monitoring system in place. Relevant data is collected on a regular basis and aim is to publish a twice yearly Local Plan Monitoring Report (LPMR) on the Council's website. This provides a regular update on the achievement of the policies and objectives in the Hastings Planning Strategy and the DMP. The most recent LPMR was published in July 2014 (Library reference HBC/DMP/27). This recognises that the Hastings Planning Strategy was so recently adopted that it is too early to monitor the majority of policies in a meaningful way. It therefore concentrates on housing and the 5 year land supply in particular. Monitoring of the take up of the sites allocated in the DMP will be a key component in monitoring the Council's 5 year land supply and is undertaken through quarterly site visits. A monitoring Board has been established consisting of senior elected Members of the Council, key Heads of Service and representatives from ESCC and Rother District. The agreed terms of reference of the Monitoring Board are appended to this submission as Appendix 1. Both East Sussex County Council and Rother District are represented on the Monitoring Board.
- 6.6.3. The actions necessary to bring the Planning Strategy or Development Management Plan (DMP) back on track in the event of any perceived shortcomings will depend on the scale and nature of the problem that has arisen. This could range from one site not coming forward, which might require discussions with site owners to identify and seek to overcome problems, to a more serious situation where the 5 year housing land supply is in jeopardy, which might require an urgent review of the DMP. A mechanism is in place to report, following consideration by the Monitoring Board, to the Council's Cabinet any significant failures in delivery and to make recommendations as to any remedial action considered necessary.
- 6.6.4. Further monitoring is carried out across all aspects of the Council's services through the quarterly performance monitoring meetings and reports to Lead Members and through monitoring reports to the Council's Overview and Scrutiny Committee, an example for Planning Policy is shown at Appendix 2.

MATTER 6: IMPLEMENTATION AND MONITORING**6.7 Upon which mechanisms will the Council rely for securing contributions for the provision of infrastructure? To what extent are the funding bodies committed to the infrastructure upon which the development relies?**

- 6.7.1. The Council's approach to infrastructure and development contributions is set out in Policy CI1 of the adopted Hastings Planning Strategy. The Council will at the present time rely on Section 106 Agreements to secure contributions from developers to the provision of infrastructure, unless it can be provided on site as part of a development. In December 2013 the Council's Cabinet decided not to implement Community Infrastructure Levy (CIL) at the present time but to monitor changes in housing prices to determine when it would be appropriate to reconsider pursuing CIL. This decision followed a report by the Nationwide CIL Service, which concluded that the relatively low sales value of open market residential property will make it very difficult to introduce CIL without significant reductions in the affordable housing policy targets in the Hastings Planning Strategy. The study also found that most forms of commercial development are not sufficiently viable in present market circumstances to be capable of accommodating CIL payments. The situation will however be kept under review.
- 6.7.2. The funding position is set out in the Schedule to the IDP and is discussed in more detail under 6.2 above. It is acknowledged that not all of the necessary infrastructure, some of which requires a variety of funding sources, is in place at the present time but it is significant that key funding bodies such as the County and District Councils and other service providers, are committed to the provision of the necessary infrastructure. There is also a strong commitment from the South East Local Enterprise Partnership (SELEP) to the delivery of homes and jobs in Hastings. The Partnership has so far obtained significant central funding of course for implementation of the Bexhill-Hastings Link Road (Chancellor's budget statement 2012) as well as more recent success from the SELEP through the growth funds available (Library reference HBC/DMP/60). Provisional funding for a Hastings and Bexhill junction capacity and improvement package and a walking and cycling package has also been obtained from the Local Enterprise Partnership (LEP). Thus local, county, regional (LEP) and central bodies have clearly shown commitment to delivery of the infrastructure upon which our development relies.
- 6.7.3. Policy CI1 of the Hastings Planning Strategy requires the regular updating of the IDP, which, as referred to above is very much a living document and this will further enable regular monitoring of the funding available to secure the timely provision of critical infrastructure and allow for alternative sources to be considered as necessary where required.

MATTER 6: IMPLEMENTATION AND MONITORING**Appendix 1****Hastings Local Plan Monitoring Board – Draft Terms of Reference****Mission**

To monitor the progress and delivery of the Hastings Local Plan, and make recommendations to address any significant failures in performance or delivery

Specific issues to be addressed

Housing, employment and retail delivery
 Infrastructure delivery
 Management and restraints of policy performance
 Identify significant failures in policy performance and recommend to Cabinet remediation measures
 The impacts and possible issues of policies
 Legislative background and updates to planning guidance
 The direction of growth within the town and forecasts for that growth

Desired outputs/outcomes

An improved understanding of Local Plan delivery and implementation
 A valued sharing of knowledge and information
 Improved partnership working/compliance with the Duty to Co-Operate
 An effective Local Plan

Persons involved

Cllr Peter Chowney, Lead Member for Regeneration
 Cllr Kim Forward, Lead Member for Housing
 Cllr Richard Street, Chair of Planning Committee
 Cllr Robert Cooke, Opposition representative
 Simon Hubbard, Director of Regeneration
 Virginia Gilbert, Head of Amenities
 Andrew Palmer, Head of Housing
 Raymond Crawford, Development Manager
 Monica Adams-Acton, Head of Regeneration & Planning Policy
 Tim Cookson, Strategic Planning Manager
 Stephanie Roots, Senior Planner
 Kerry Culbert, Senior Planner
 Sujeet Sharma, Senior Planner
 Claire Hill, Technical Monitoring Officer
 Jon Wheeler, East Sussex County Council
 David Marlow, Rother District Council
 Additional parties who will be consulted as and when required, for example utility companies.

Meetings

It is proposed that the Local Plan Monitoring Board meets every 6 months, prior to the publication of the Local Plan Monitoring Report and its update or on demand if there are interim issues to discuss.

Appendix 2 - Extract from Overview & Scrutiny Committee 13.02.14 - in respect of the Local Plan/Development Management Plan

Regeneration Directorate

REGENERATION AND PLANNING POLICY SERVICES

During 2013/14 we will:

3. Progress the development and adoption of the Local Plan and complete necessary work to determine the feasibility of a Community Infrastructure Levy for Hastings.

Measures:

- a) Progress Planning Strategy and accompanying documents through to adoption, responding to outcome of the Examination in Public as necessary.
- b) Complete consultation on the draft Development Management Plan, submit to Secretary of State and undertake necessary work prior to Examination in Public currently programmed for Q3 (subject to outcome of Planning Inspector's report on Planning Strategy and public consultation).
- c) Complete the Community Infrastructure Levy feasibility analysis.
- d) Develop the future planning policy work plan subsequent to the outcome of this year's Examinations in Public.

Performance @ QTR 3 – a) c) d) On target, b) will not meet target

Progress –

- a) The Local Plan: Planning Strategy underwent an additional day's hearing session as part of the Examination in Public (10 Sept.). The Inspector examined the Main Modifications and issues of objectively assessed housing targets and the "Duty to Co-operate." The Inspector's report was received on 21st October 2013 and the document is considered sound and legally compliant subject to the Main Modifications. It is intended to adopt the Planning Strategy at Council in February 2014.
- b) The Local Plan: Development Management Plan (DMP) original timetable cannot be met due to the requirement that the DMP cannot progress to Examination in Public until the Planning Strategy is adopted. Due to the slippage a further round of consultation is required on the advice of the Planning Inspectorate to bring the document up to date and respond to representations made at the last consultation. The document is being reviewed so that we are in the strongest position to defend it at the Examination. A "revised" Proposed Submission Version of the DMP is being prepared for consideration by Cabinet and Council in February. Submission of the DMP is expected in Q2 2014.
- c) A viability study from external consultants into the possible application of Community Infrastructure Levy (CIL) in Hastings has been analysed and a report was presented to the November meeting of Cabinet. It was resolved to not pursue CIL at this time because its application would adversely affect the delivery of affordable housing. It was agreed to monitor changes in house prices in order to determine when it may be appropriate to reconsider pursuing CIL.
- d) A plan has been developed. The major work in the short term will be centred on the consultation, submission and examination of the DMP. Other work includes an Affordable Housing Supplementary Planning Document (SPD); potentially the requirement for a Town Centre area action plan; some site specific work to aid deliverability and continued update and monitoring of policies and housing and infrastructure delivery.