



Local Development Framework Core Strategy

Examination - 24 June to 11 July, 2008



Hearing Statement in respect of Matter 2

Essex County Council



MATTER 2

APPROPRIATENESS OF THE OVERALL SPATIAL STRATEGY AND SETTLEMENT HIERARCHY

Whether the overall strategy for broad areas of growth is the most appropriate in all the circumstances, having considered the relevant alternatives and whether it is founded on a credible evidence base. To include consideration of Regulation 32 sites at Marks Tey/Stanway. Other Regulation 32 housing sites to be dealt with under Matter 3/3.

Tests: 4 - 9

Policies: SD1, SD2, H1

ISSUES

- (a) Is the amount and timescale of new housing consistent with national and regional policy?

The Housing Topic Paper (CBC/EB/058) provides the technical justification to explain how the amount and timescale of new housing is consistent with national and regional policy. It also describes how the evidence base supports the timescale for delivery of housing.

- (b) Should the targets be expressed as minima not ceilings in policies SD1 and H1 and Table H1a?

The Schedule of Proposed Minor Changes includes wording changes to Policies SD1 and Table H1a to provide that housing targets are considered as minima and not ceilings. Policy H1 already provides that the housing target is a minima as it is worded that *at least* 19,000 new homes will be delivered.

- (c) Has the process of consultation and assessment resulted in the most appropriate strategy for distributing growth? Have all reasonable options been considered?

The Soundness Self-Assessment (CBC/SUB/010) sets out the comprehensive process of consultation and assessment that resulted in a Core Strategy that provides the most appropriate strategy for distributing growth. It describes how at each stage consultation with stakeholders and the public was integrated with findings from the evidence base and the Sustainability Appraisal to inform the selection of options and the overall spatial strategy. The overall process included an additional stage, Amendment to the Preferred Options, to ensure that the Core Strategy reflected new evidence, evolving Government guidance and a clear outline of preferred options.

The process of consultation included community consultation and stakeholder involvement, in line with the Statement of Community Involvement (CBC/SUB/009). The results of the consultation process are detailed in the Regulation 28 Pre-submission Consultation Statement (CBC/SUB/003) which includes the responses from each consultation phase and how they informed the production of a final Core Strategy. The report notes there was general agreement on overall objectives, but that some more contentious issues such as the location of new housing produced more divided opinions. Preferred option decisions in these cases thus flowed from Sustainability Appraisal findings, national policy guidance, and evolving best practice in Core Strategy formulation. Policy decisions were scrutinised and ratified by the Local Development Framework Committee which deals with the Council's responsibilities relating to the Local Development Framework. The reports provided to inform each stage of the Committee's decision making process on the Core Strategy are included in the Evidence Base (CBC/CR/001-020).

The Sustainability Appraisal (SA) (CBC/SUB/002) details the assessment of a wide variety of policy options that have informed the formulation of the spatial strategy. The SA also assesses 2 broad spatial strategy options in Section 5.9.2. It is considered that the SA considered all reasonable options within the scope of the Core Strategy. The SA set out the preferred options for housing growth, employment growth and the overall strategies for managing this growth. The Core Strategy was formulated on the basis of the preferred options identified in the Sustainability Appraisal. Additional detail is contained in the Council's response to the Inspectors request for information on the Sustainability Appraisal of Small Sites (CBC/EB/071 & 072).

- (d) Are the assumptions set out clearly and is the overall strategy supported by evidence prepared in accordance with national guidance and good practice guidance?

Yes, the assumptions are clearly explained in the submission strategy as well as the Sustainability Appraisal (CBC/SUB/002). Chapter 2 of the Core Strategy includes a Spatial Portrait and Key Issues for Colchester which clearly set out the background and assumptions underlying the appropriate spatial strategy for Colchester. The wide range of sources listed in the Evidence Base (2.3) provides a solid foundation for Core Strategy policies. All the studies for the Core Strategy evidence base were prepared in accordance with national guidance and good practice guidance.

- (e) Is it clear how decisions have been taken in choosing between competing alternatives?

Yes, refer to the Sustainability Appraisal Report (CBC/SUB/002) which details how options were refined over the course of the Core Strategy preparation process along with the response to Matter 2c above.

- (f) What is the evidence that there is a 5 year supply of deliverable sites in line with the guidance of PPS3, starting from the date of adoption? Is there evidence to identify the 10 and 15 year supply from the date of adoption?

A Strategic Housing Land Availability Assessment (ref. CBC/EB/31) has been undertaken in accordance with PPS3 which clearly demonstrates a 5 year supply of deliverable sites and a 15 year supply of sites overall. Further updated information on housing delivery has been submitted in response to the Inspector's request for further information (CBC/EB/083).

Section 5.7 of the Housing Topic Paper (CBC/EB/058) describes the detailed Housing Survey undertaken by the Borough to establish the deliverability of its housing targets. For the first part of the plan period (2001-08), Colchester has exceeded its targets and can demonstrate its ability to meet its target for a future 5 year supply of deliverable sites. The Council has recently agreed the following short term LAA targets which reflect the current housing market:

- 2008/09 - 955
- 2009/10 - 855
- 2010/11 - 1,000

Agreement of these targets reflects Colchester's status as a Growth Area within the Haven Gateway and the corresponding commitment by Central Government to support higher growth levels with funding for related infrastructure. The LAA targets are strongly dependent upon good housing market conditions remaining in place for the next three years.

Evidence for the deliverability of the 10 and 15 year targets is by definition more contingent, but the Housing Survey noted above gives sufficient confidence for its robustness at this stage of the Core Strategy. The targets will of course be monitored through the Annual Monitoring process and the Core Strategy subsequently revised if necessary to allow for the release of additional land.

- (g) Is there too much reliance on previously developed land?

Government guidance in PPS1 (para 27 viii CBC/NAT/001) and PPS3 (paras 40-44 CBC/NAT/002) provides that previously developed land should be the priority location for new development, so the Core Strategy rightly focuses on concentrating new development on previously developed land within the Town Centre and Growth Areas. Evidence for the current deliverability of this approach is provided by the Annual Monitoring Report (sections 6.2.2, 6.3.3 CBC/SUB/013) which showed that 88.3% of all built dwellings, 100% of retail and office developments and 84% of other B use developments in 2005/06 were built on previously developed land. The Housing Delivery Survey included in the Housing Topic Paper (CBC/EB/058) provides detail on the continuing good supply of sites on previously developed land to meet 5 and 10 year targets. The Core Strategy accordingly does not provide for significant greenfield allocations until 2016 at the earliest.

The Employment Land Study (para 5.14 CBC/EB/030) prioritises brownfield sites in its selection criteria for potential employment locations, with the exception that some warehousing/industrial uses will be directed to greenfield sites with good transport access.

Further details can be found in the Sustainability Appraisal, (CBC/SUB/002), the Housing Topic Paper (CBC/EB/058) and the Centres and Employment Topic Paper (CBC/EB/059).

- (h) Is it reasonable to regard the broad areas of identified greenfield land as a contingency (pg 67)? On what evidence is this based? Should more than two broad areas be identified to provide a greater level of flexibility and ensure delivery of housing?

Sufficient housing sites have been identified to provide for a 5 year supply of deliverable sites and for the further period to 2016. This is referenced in the evidence base material in response to (f) above. Thus, to meet RSS requirements, the current expectation is that it is not necessary to consider the delivery of greenfield sites until 2016.

The two greenfield areas contain significant housing capacity and there are no obstacles to new housing delivery on them. Therefore, consideration of other greenfield areas for the period up to 2023 is not necessary.

The broad areas of greenfield land are not being planned for as contingencies, the paragraph merely notes that they could be considered as contingencies. This paragraph states that:

'It is possible that the housing provision up to 2023 could be delivered without the broad areas of Greenfield land, however this land provides both a contingency to housing delivery and an opportunity to deliver sustainable new neighbourhoods that will contribute towards strategic facilities, infrastructure and zero carbon homes. To maintain the focus on regeneration, these broad areas of greenfield land will not be developed until 2016.'

It is suggested that a minor amendment be made to the wording of this section to clarify this and alternative wording is included in the Schedule of Proposed Minor Changes (CBC/EB/078).

Housing delivery is not an exact science. The Strategic Housing Land Availability Assessment identified theoretical capacity within previously developed land, existing allocations and regeneration areas for approximately 19,460; and this was based on relatively conservative density assumptions given recent planning permission. Therefore it is fair to say that it is possible to achieve the housing target without additional greenfield allocations, although there is obviously a risk that the theoretical capacity will not be delivered. Focusing on only one source of housing land can also make it more difficult to achieve wider sustainability

objectives, such as delivering a choice of housing types and sizes, and, where issues of brownfield viability arise, can result in lower levels of investment in affordable housing and strategic infrastructure. In the case of the large greenfield urban extensions, these are also identified on the basis of providing a direct linkage with regeneration of existing communities in those areas. Therefore, in order to provide security in the delivery of housing to achieve better sustainable homes outcomes, and to secure more development contributions towards facilities and infrastructure, it was considered prudent to take a more conservative interpretation of the SHLAA (as thoroughly detailed in Section 3.1 of the Housing Topic Paper). This conservative interpretation identified that 15,314 homes could be delivered with a very high level of confidence. The Core Strategy then sought to supplement this with additional housing delivery in regeneration areas (approx 500) and make provision for additional capacity on greenfield land (approx 3000). It is noted that PPS3 (CBC/NAT/002) recognises that whilst priority should be afforded to previously developed land, development of greenfield land is not precluded where wider sustainability objectives can also be met.

See also the response to Matter 3/1(e).

- (i) Should more new housing be sought from small greenfield sites within or adjoining the urban area to provide flexibility and ensure delivery of housing targets, particularly in the early years as larger sites may take time to come on stream?

No, refer to the response to the Inspector's request for further information on the sustainability appraisal process for small greenfield sites. (CBC/EB/071 and 072) This explains that the sustainability appraisal process discounted small greenfield sites as significant sources for additional growth due to the availability of more sustainable brownfield sites. As noted above in the response to question 2 f), no need has been demonstrated for additional sources to meet housing targets for the plan period due to Colchester's high rate of housing delivery.

- (j) Is there evidence to justify holding back greenfield sites until 2016? Would 2011 be more appropriate?

As noted above in the response to question 2 f), no need has been demonstrated for additional sources to meet housing targets for the early years of the plan period. This is due to Colchester's historically high rate of housing delivery, the number of dwellings which already have planning permission (7455 units at 31.3.08) and the number of sites already allocated in the Local Plan (CBC/EB/11). PPS1 (CBC/NAT/001) and PPS3 (CBC/NAT/002) prioritise the development of brownfield sites over greenfield sites, so the Core Strategy reserves the use of significant new greenfield sites for the end of the plan period when the supply of brownfield sites has diminished. If delivered after 2016 these greenfield urban extensions can deliver zero carbon homes, which the Government is seeking to make compulsory from 2016.

- (k) Is the settlement hierarchy appropriate or should there be a more detailed hierarchy of villages, related to facilities, with more growth in the rural areas?

Please refer to the response to Matter 4 c).

The previous Local Plan distinguished between Principal Villages and Small Villages. This was not however, also matched with clearly distinct policy approaches for each type of village. The development of Core Strategy policies accordingly included the examination of the evidence base for continuing separate categories for Principal and Small Villages. As noted in the Sustainability Appraisal, (pp 51-52 CBC/SUB/002) evidence from the Countryside Agency indicated that the settlement hierarchy in market town areas like Colchester were primarily characterised by the dominance of the main town rather than by any noticeable functional differences between small, medium and large villages (CBC/NAT/049). The Sustainability Appraisal also referred to the Essex Rural Strategy (CBC/REG/012), which identified the wider trends resulting in reduced levels of service provision in villages. The Sustainability Appraisal concluded that the Boroughs' villages do not provide adequate employment facilities and infrastructure to support major new development and that development in villages should be largely confined to small scale employment, affordable housing, and community facilities in line with locally identified needs. Given the small quantum of village development involved, it was not proposed to continue the distinction between Principal and Small Villages.

- (l) Is the housing allocation at Tiptree supported by robust evidence and has it been subject to Sustainability Appraisal?

Tiptree is categorised as a District Centre along with West Mersea and Wivenhoe, and was appraised along with these similarly categorised settlements as any differences between them were not considered to be sufficient to warrant separate appraisals. Housing location Option 4 considered in the Core Strategy Sustainability Appraisal (CBC/SUB/002) provided for 3-5000 units of new housing development in the district settlements and other villages in the Borough. The Sustainability Appraisal found that it would be difficult to support these new communities with the necessary facilities and infrastructure and that new developments would be likely to have an adverse impact on the countryside and landscape character. (p. 72). The small additional allocation of 140 units to 2021 is considered to be consistent with Tiptree's role as a District Centre and makes good use of vacant land which has been allocated for employment use but never developed (in accordance with Planning Policy Statement 3 para. 44). An evaluation carried out as part of the Employment Land Study (CBC/EB/030) rated employment land in Tiptree lowest of all allocated employment sites in the borough. The study found that the land will probably not come forward for employment development within the plan period. The site scores at the lower end of the scale, due to

its low accessibility and perceived low market interest. Employment land available at Tower House, Tiptree is considered to be more suitable to meet local needs up to 2021.

- (m) Would it be the most appropriate strategy in all the circumstances to allocate a substantial proportion of new growth to Marks Tey/Stanway? For alternatives put forward, what part of the Core Strategy is unsound without them? What tests does the Core Strategy fail? How can it be made sound? What is the precise change/wording that is sought?

The allocation of a substantial portion of new growth to Marks Tey/Stanway is not considered to be a sustainable option for development in Colchester Borough during the plan period. The Sustainability Appraisal (CBC/SUB/002) clearly considers this as Housing Delivery - Policy Options 3 in Section 5.3.2 and also as Strategic Option 2 in Section 5.9.2.

See also detailed responses made at 2 (c), (n) and (o).

- (n) Consideration of Regulation 32 sites relating to Marks Tey/Stanway. How do they perform in terms of deliverability? Are there constraints on their development, what date could they start to contribute to completions and in what quantity?

Alternative Sites 5, 6 and 7 – Marks Tey and Stanway

All three alternative sites promote large areas of development. There are some general policy comments that apply to all three sites;

- There is no justification or need for the proposals as sufficient land has already been identified through the submitted core strategy to provide for housing delivery up to 2023 in sustainable locations.
- Major development at Marks Tey/Stanway would divert development activity and investment, and undermine the broad thrust of the overall spatial strategy to promote the urban regeneration of Regeneration Areas, beneficial re-use of PDL, and infrastructure improvements in the main urban area of Colchester.
- The proposals are contrary to the broad policy direction of PPG13 Transport to minimise the need to travel, reduce the distances travelled, and to promote the use of alternative travel modes to the private car. This is because the proposed development is not likely to be self-contained and implies significant out-commuting for employment, retail, leisure, and community needs.
- The development locations do not provide the same opportunities to travel using public transport, cycling or walking compared to the submitted core strategy which focuses growth around the town centre or close to transit corridors.

The key aspect of deliverability is the Highways Agency (HA) consultation response which says any Marks Tey development could only be

considered if sufficient infrastructure enhancements were linked to the proposed A120 Braintree to Marks Tey improvements. The timing and location of this new road have yet to be determined making any consideration of Marks Tey as a major location for growth premature. We understand from the Regional Funding Allocation process that full funding for the scheme has yet to be identified in the period up to 2016. The estimated total cost of the scheme was £370m (HA response to the RFA). The HA also expect that development of the scale proposed would require more significant infrastructure than just the A120 Braintree to A12 link.

The principal constraints to the development at Marks Tey would be the strategic A12 and A120 Trunk Road and the Great Eastern mainline subdividing the development. It would be not be possible to create a single cohesive sustainable development without moving the A12, A120 and the Great Eastern Mainline (GEMML). There are no such proposals for this by either Highways Agency or Network Rail for the A12 and the GEMML. It would be a retrograde step to allocate development split by heavily utilised strategic transport arteries, especially the road network with their inherent environmental issues such as noise, air quality and severance. The A12 and A120 trunk roads meet at Marks Tey resulting in a complex grade separated junction arrangement with eight lanes of traffic making it extremely difficult to access the rail station by any other mode except the car. To connect the isolated areas together the development would require significant sustainable infrastructure to cross these trunk roads. The Sudbury branch line joins the mainline at Marks Tey and even though not heavily used railways are difficult to cross due to safety and operational reasons.

Marks Tey is sufficiently distant from Colchester town centre to require self-sufficiency. The minimum amounts of new development required to achieve this objective would be in excess of 5000 homes (see Best Practice in Urban Extensions & New Settlements, Town & Country Planning Association, March 2007 (CBC/EB/070, see in particular page 43). However, even at this minimum size it is not possible to be self sufficient in terms of jobs and sustain a transport service. The accessibility analysis calculated that from Marks Tey to the current major services the average travel distance was 7km (Housing Topic Paper CBC/EB/058). The average travel distance for the proposed greenfield allocations was no greater than 3km. With Marks Tey being on the strategic road and rail networks easy access to these will not reduce the need to travel either into Colchester or westwards to London. Internally it is difficult for operators to provide a comprehensive commercially viable public transport service at this level of development and therefore the developer would need to fund such services. Essex County Council objected to the alternative sites for a number of highways and transportation reasons (see reps. 222, 223 and 224).

There is no acknowledged need for this extent of greenfield housing within the plan period and any lesser amount of housing could not be self-sufficient. Alternatives for a new settlement growth option will not be

considered unless there is sufficient housing demand to establish a viable neighbourhood.

In terms of delivery, significant infrastructure would be required, to support 10,000 new dwellings including the following;

- Seven x 420 place primary schools with associated early years & childcare facilities (estimate 7 x 2 hectare sites plus 7 x £6.5m)
- One secondary school with capacity for 12 forms of entry including 6th form (estimate 15 hectares plus £50m build cost)
- A new community centre
- The completion of the proposed new A120 Braintree to A12 link (£370 million)
- Significant additional highways and transportation infrastructure
- Open space - £3.61m per 10,000 pop
- Play provision - £1.849m per 10,000 pop
- Outdoor sport - £5.48m per 10,000 pop
- Indoor sport - £2.07m per 10,000 pop
- Swimming pool - £3.064m per 10,000 pop
- Allotments - £539,400 per 10,000 pop

These are estimates and numbers would depend on dwelling mix and costs on land topography. The list is not exhaustive but is intended to illustrate the significant infrastructure that would be required if the alternative sites went ahead.

Alternative Sites 5 & 6 – Marks Tey and Stanway Mixed use scheme

This representation promotes the development of a large area of land at Marks Tey and Stanway and argues that the Councils' sustainability appraisal has been inadequate in identifying the most sustainable greenfield sites. The consideration, justification and evidence for the Stanway growth area is set out in the Sustainability Appraisal (ref. CBC/SUB/002).

The land concerned is greenfield and undeveloped. Development of this scale would have significant impacts on the landscape value of the countryside in this area, and result in a large scale extension of urban development along the A12 / mainline railway corridor. This would produce a continuous linear development and would present major difficulties in attempting to establish any form of town centre or other focal point for the community. The open countryside separating Colchester and Marks Tey from Kelvedon would be severely reduced with urban sprawl continuing for a considerable distance.

The railway station is positioned to the north of the sites where the A12 and A120 trunk roads meet at Marks Tey. There is a complex grade separated junction arrangement here which results in eight lanes of traffic

making it extremely difficult to access the station by any other mode except the car. Given the potential size and the linear nature of the proposed developments, it is likely that many areas of the development would be a considerable distance from Marks Tey station, outside of what can be considered a reasonable walking distance.

With Marks Tey being on the strategic road and rail networks easy access to these will not reduce the need to travel either into Colchester or westwards to London. This large northern site would be adjacent to the single carriageway A120 Trunk road which is congested and operates over capacity and will only be relieved of traffic with the delivery of the £370million A120 Braintree to A12 link. Two of the smaller sites are in proximity to Marks Tey railway station and they also benefit from good access to the A12 and A120 trunk roads. Although located on the mainline railway, Marks Tey is a small station and mainline services frequently do not stop. There is also a lack of an effective interchange with other public transport services such as local buses. The location of development close to Marks Tey station does not provide the same opportunities to travel using public transport and is less sustainable than a location in Colchester town centre or close to the transit corridors proposed by the Core Strategy.

The small northern most site in particular is separated from the existing residential development at Marks Tey station by agricultural land. This remoteness would likely serve to discourage journeys by foot or cycle. Another key problem with these sites is poor connectivity through to the existing development and proposed sites to the South of the A12. Again, this is particularly the case by foot or cycle given the need to negotiate the busy A12/A120 trunk road junctions and the lack of direct routes.

There are a small number of shops in both Marks Tey and Copford. The provision of a successful urban centre providing local services and employment opportunities would be essential in reducing the need to travel. This is likely to be difficult to achieve on a linear site interspersed with existing development. The lack of an established local centre or local economic opportunities, other than what could be achieved within the development, means any residents would be likely to need to travel into Colchester town on a regular basis. The distance into the town centre would be approximately 8km from the larger proposed site, and approximately 6km from the smaller eastern most proposed site. The close proximity of the A12 trunk road would encourage use of the private car. Even if large investments in public transport could be provided, the creation of a development with high levels of need to travel is likely to be undesirable and unsustainable.

Alternative Site 6 includes the same areas of land as alternative site number 5 above and therefore the same issues and constraints apply. In addition, this representation also includes 3 smaller greenfield sites to the North of the A12 and the railway line. These sites also suffer from a number of additional constraints to their development particularly flood risk. The sites located immediately to the North of the railway both contain

areas of flood zone 2 and 3. This is particularly the case with the Eastern most of these sites, where much of the site is within flood zone 3.

***Alternative Site 7 – Land at Marks Tey
Residential, employment, schools, local centre, country park, station improvements***

This alternative site proposes the development of a large area of mainly greenfield land to the North of Marks Tey station and the existing residential area of Marks Tey. Given that this representation concerns a development of significant size surrounding Marks Tey the site raises many of the same sustainability concerns as alternative sites 5 and 6. Further constraints were put forward during the alternative sites consultation and are detailed in the regulation 33 statement.

The land put forward under this representation is located outside of the existing settlement boundaries and would result in a significant loss of open countryside. The land is also subject to a number of physical constraints. In particular, land towards the North East of the site is classified as flood zones 2 and 3 by the Environment Agency flood risk map. This is likely to be a significant constraint to the development of these parts of the site. There are also some small areas of woodland and hedgerows on parts of the site which would be lost if a large scale development was to proceed. Although the site is in proximity to Marks Tey railway station, the same concerns as with the other Marks Tey sites apply, particularly regarding the level of service that this station can provide and concerns over placing development where there is likely to be a high level of need to travel. The size of site also means that many areas will be further from the station or a frequent quality public transport service than what can be considered a reasonable walking distance. Combined with these poor levels of public transport provision, there would be good access to A12 and A120 which is likely to encourage use of the private car. The A120 already suffers from serious congestion problems in the Marks Tey area which are likely to provide a further constraint on development in this area. The Highways Agency and the Local Highway Authority consider park and ride in this location would be too far out of Colchester Town Centre and they question the sustainability of the site.

- (o) Would the amount of new housing required to produce a new community at Marks Tey/Stanway be too much in one place? What thresholds of new dwellings would be required to support key facilities such as a secondary school, supermarket, health centre, sports facilities?

The proponents of a new settlement concur with the view quoted above in the response to Matter 2(n), alternative sites 5, 6 and 7, that a new settlement needs to provide between 5-10,000 dwellings. The Best Practice in Urban Extensions and New Settlements document (CBC/EB/070 sec. 8.4.5) also states that such a settlement could only be sustainable if part of a network of similar proposals linked by high quality

public transport links. Nevertheless, during the 2006 to 2023 plan period the Sustainability Appraisal considered however that development of over 5,000 homes at Marks Tey would have adverse implications for regeneration and sustainability, as detailed in Section 5.3.2 (CBC/SUB/002).

Development at Marks Tey would not reduce the need to travel and even at the levels suggested many people would still travel to Colchester for their leisure, retail and education opportunities where there is greater choice (Housing Topic Paper, Accessibility Study CBC/EB/058). At present there are few existing facilities from which to serve development in the short term. With easy access to the A12/A120 car based commuting will not be discouraged.

- (p) Should policy SD2 be clarified so that it does not require developers to contribute both to local and strategic infrastructure?

There may be instances where both local and strategic infrastructure is required so there is no intention to amend the policy. For example development that cumulatively contributes to the need for strategic infrastructure may also require more localised infrastructure improvements to meet the community needs arising from the development and to make it acceptable in planning terms. The policy already states that the viability of developments will be considered when determining the extent and priority of development contributions. This provides reasonable flexibility to require the most appropriate levels and types of contributions for the circumstances.

As stated by Circular 05/05 (paras. B17, B25, B26) the general principles on the use of planning obligations should be included in Development Plan Documents, and details of their application in Supplementary Planning Documents. The Core Strategy is intended to be an overarching DPD and meets this requirement by setting out the Council's general approach to the delivery of facilities and infrastructure. It is not the role of the Core Strategy to give specific details on the implementation of this approach. It will be possible to provide further details on application and implementation through the Development Policies DPD and Supplementary Planning Documents as required.