



CHARNWOOD LOCAL PLAN 2021-2037

Examination Statement by Charnwood Borough Council

**Matter 2:
Vision, Objectives, Sustainable Development &
Development Strategy**

May 2022

Issue 1 - Are the Vision for Charnwood 2037 and the Plan's objectives soundly based and will they contribute to the achievement of sustainable development?

2.1 Do the Plan's vision and objectives cover the full range of opportunities, challenges and priorities that need to be addressed in the Borough over the Plan period? Is it clear how the policies will help to deliver the vision and objectives over the Plan period?

2.1.1 Yes – the vision and objectives clearly flow from the profile of Charnwood SD/2 paragraphs 1.19 to 1.24, they take account of representations received through the Regulation 18 consultation they are an expression of Charnwood's local priorities to 2037 and are comprehensive. Each policy in the Local Plan can be linked back to the vision and objectives, and therefore it is clear how they will deliver the vision and objectives of the Local Plan.

2.2 Will the Plan contribute to achieving sustainable development, including a sustainable pattern of development, as set out at NPPF paragraph 11a and if so, how?

2.2.1 Yes – Policy DS1 of the plan identifies Charnwood's development needs and subsequent policies within the plan add appropriate detail as to how development needs will be delivered alongside infrastructure requirements. The overall pattern of development is guided by the evidenced settlement hierarchy with all reasonable alternatives tested through a Sustainability Appraisal. More detail on the justification for the development strategy and infrastructure delivery can be found in the Council's response to questions under matter 2, issue 3 and also in response to matter 8. Policies in Chapter 7 of the plan set out how the effects of climate change will be managed and mitigated – more detail is provided in response to Matter 1 question 24. Policies in Chapter 8 of the plan set out how environmental land use matters will be managed.

Issue 2 – Is the proposed settlement hierarchy positively prepared and justified by the evidence and are the proposed limits to development justified and soundly based?

2.3 Is the Settlement Hierarchy Assessment (EB/DS/3) based on a robust methodology and relevant criteria in relation to the availability of and access to services and facilities?

2.3.1 Yes, EB/DS/3 is based on a robust methodology and relevant criteria in relation to the availability of and access to services and facilities. EB/DS/3 identifies the range of services and facilities within individual settlements in Charnwood and explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provides evidence that enables the identification of a settlement hierarchy for Charnwood (paragraph 1.1).

- 2.3.2 EBD/DS/3 examines settlement pattern and context; local housing markets; travel to work patterns; retail catchments; employment provision; access to public transport; and the services and facilities available within each settlement. The assessment draws on data and evidence from several sources, (paragraph 1.6). Figure 9 (EB/DS/3 paragraph 8.4) sets out the methodology and criteria for the audit of each service and facility (this also includes the methodology for assessing access).
- 2.3.3 A range of information sources were used to undertake the audit which also benefited from consultation with Town and Parish Councils and Charnwood Borough Council local ward councillors during December 2017. A summary of the audit is presented in Figure 10 EB/DS/3 page 24) with more detailed information for individual settlements in Appendix A (page 32). An update of the survey work was carried out in October 2020 to ensure data was up to date and this is reflected in EB/DS/3.

2.4 How has the Settlement Hierarchy Assessment informed the development strategy in Policy DS1?

- 2.4.1 The Settlement Hierarchy Assessment identifies five settlement categories based on their ability to accommodate sustainable development and to provide “the greatest potential to minimise the need to travel and maximise the use the sustainable transport” (ED/DS/3 paragraph 9.1, page 27). These types were used to inform the distribution options that were tested through the Sustainability Appraisal process. The two most sustainable settlement types (urban centres and urban settlements) were considered in terms of both type and location as follows:
- Leicester Urban Area – the urban settlements of Birstall, Syston and Thurmaston considered together based on their functional relationship with the wider urban area.
 - Loughborough Urban Centre – the urban centre of Loughborough considered separately from the wider urban area covering both Loughborough and Shepshed.
 - Shepshed Urban Centre – the urban settlement of Shepshed considered separately from the wider urban area covering both Loughborough and Shepshed.
- 2.4.2 The remaining three settlement types (Service Centres, Other Settlements, and Small Villages or Hamlets) are identified in ED/DS/3.
- 2.4.3 The settlement hierarchy was used as the basis for the testing of reasonable alternatives for the scale and distribution of development through sustainability appraisal, and which later then informed the selection of specific sites. This testing process is set out in more detail in SD/19 Section 4 SD/5 Section 4. As a result of the Sustainability Appraisal work, a hybrid development strategy was identified based on this hierarchy SD/5 section 4.3. This was further

refined based on consultation, evidence, and additional Sustainability Appraisal.

- 2.4.4 The development strategy set out in Policy DS1 directs growth to the most sustainable locations using the hierarchy based on ED/DS/3 as the basis for identifying the most sustainable locations.

2.5 Are the settlements included within the settlement hierarchy categories of Urban Centre (Loughborough), Urban Settlement, Other Settlements and Small Villages or Hamlets in the Countryside justified? (Table 4 of the Plan). Does the settlement hierarchy appropriately reflect the role and function of these settlements?

- 2.5.1. Yes, the settlements included within the settlement hierarchy categories of Urban Centre, Urban Settlement, Other Settlement and Small Villages or Hamlets in the Countryside are justified. The audit of the key services and facilities available undertaken in EB/DS/3 has provided an understanding of which settlements can cater for the day to day needs of the people living there and which settlements provide for the needs of people living in other settlements. The assessment has also considered the relationships between places and the role and function of each settlement. Taken together, this information provides a detailed understanding of each settlement and also the role and function it performs within a broader context. This provides sufficient justification for the settlements included within each settlement hierarchy category.
- 2.5.2. This information has been used to place the Borough's settlements in a hierarchy using the criteria set out in Figure 11 (EB/DS/3 page 27). These criteria are also used in the reasoned justification for Policy DS1 Table 4. Whilst the hierarchy uses criteria that have been defined to categorise the settlements, there is also a degree of professional judgement in establishing and applying the criteria taking account of the pattern of provision found by the audit and how settlements are found to relate to one another through the evidence of housing sub-markets, retail catchments, accessibility and travel to work patterns. Where a judgement has been made the reasons have been given.

2.6 How does the 'Leicester Urban Area' relate to the settlement hierarchy in Table 4?

- 2.6.1. The Leicester Urban Area relates to the area in the south of Charnwood which has close physical and functional relationships with the city of Leicester and consists of the urban settlements of Birstall, Syston and Thurmaston, identified in Table 4; the two Sustainable Urban Extensions (SUEs) at North East of Leicester and North of Birstall; along with some areas which are not

settlements in themselves but do have a closer relationship with the city than with any settlement in Charnwood.

- 2.6.2. A main modification is proposed to clarify this situation under reference Main 2b

2.7 The Plan also refers to ‘Urban Areas’, for example in paragraph 3.206. What areas are being referred to and is this clear?

- 2.7.1. The Urban Areas relate to the wider Leicester or Loughborough urban areas. The Loughborough Urban Area comprises Loughborough urban centre and Shepshed urban settlement whilst the Leicester Urban Area comprises the urban settlements of Birstall, Syston and Thurmaston and the North East of Leicester and North of Birstall SUEs. There are also other locations which form part of the urban areas but do not constitute settlements in their own right. Main modifications are identified which will provide clarity and ensure consistency in the terminology used (reference Main 2a to Main 2q)

2.8 Should the Sustainable Urban Extensions be identified as urban settlements in the hierarchy?

- 2.8.1. Reference to the Sustainable Urban Extensions should be included in Table 4 (SD/2 pages 24-25).
- 2.8.2. As they are developed and occupied the Sustainable Urban Extensions will become part of the urban areas of Leicester (North East of Leicester and North of Birstall) or Loughborough (West of Loughborough). While these developments will have a large element of self-sufficiency, they will also have important functional relationships with the adjacent urban area. Until their development is further advanced and other matters such as parishing arrangements are settled it is unclear how each Sustainable Urban Extension would be best described, either as an urban settlement in its own right or part of an already identified urban settlement.
- 2.8.3. However, in order for Table 4 to accurately describe the settlement hierarchy and therefore effectively set out the development strategy main modifications are proposed to include a description of the roles played by the Sustainable Urban Extensions. (Modification reference MAIN2s – MAIN2t).

2.9 Why have small villages or hamlets been identified as a separate category in the settlement hierarchy if they are subject to the same policy approach as the countryside in Policy C1?

- 2.9.1. Whilst small settlements and hamlets form part of the countryside they are still a category of settlement, defined as having limited services and facilities to meet the day to day needs of the residents (EB/DS/3, paragraph 9.18) and are generally poor locations for development SD/2 paragraph 3.223.
- 2.9.2. A definition of small villages or hamlets is also needed to support the application of other policies in the plan such as Policy H5: Rural Exception Sites, which supports small scale developments in rural areas where development is adjacent, or otherwise well related to a rural settlement. The application of policy H5 relies on having small villages and settlements being defined (SD/2 paragraph 4.40).

2.10 Are the limits to development based on a robust and credible evidence base and are they appropriately drawn on the Policies Map?

- 2.10.1. Yes, the limits to development are based on robust and credible evidence. This includes the Charnwood Settlement Limits Assessment (EB/DS/5) and Annex A - Mapped New Settlement Limits (EB/DS/6). EB/DS/5 includes a set of assessment principles and criteria which have been prepared to provide a methodical approach and ensure that the draft settlement limits have been prepared in a clear, transparent and objective manner. The criteria were developed in consultation with Town and Parish Councils and Local Ward Members, who are largely the parties interested in preparing Neighbourhood Plans in Charnwood. Specific focussed consultation on the Settlement Limit Criteria took place from 3rd August – 15th September 2016 (paragraph 2.2). The limits to development are appropriately drawn on the Policies Map.

Issue 3 – The Development Strategy

2.11 Is the distribution of development in Policy DS1 justified by the evidence and were all options for the level and distribution of growth tested through the Sustainability Appraisal? What is the justification for a greater proportion of new dwellings being delivered in the Service Centres compared with the ‘hybrid’ option tested?

- 2.11.1. The distribution of development is justified by the evidence. The answers to questions 2.3 and 2.4 set how evidence was used to establish a settlement hierarchy in EB/DS/3 and how this, in turn, was used to inform the development strategy. The answers to questions 1.17 and 1.18 set how the options for the level and distribution of growth were tested through the Sustainability Appraisal process. Appendix B to TP/2 sets out how options in relation to site selection were considered. The Sustainability Appraisal itself used a variety of evidence sources set out in SD/5 Table 2.2 and Appendix F

to evaluate the strategy and site options. EB/DS/1 and EB/DS/4 also provide evidence in terms of the availability of sites.

- 2.11.2. Paragraphs 3.10 and 3.11 of TP/2 set out the circumstances that had changed between the consultation on a Draft Local Plan in 2019 and the preparation of the Pre-submission Draft Local Plan. The combined effect of these was that the number of new homes that needed to be found was 8,951 rather than 7,800 upon which the hybrid option was based. The identification of suitable sites (described in TP/2) enabled an additional 224 homes above that set out in the hybrid strategy to be allocated in the urban areas of Leicester, Loughborough and Shepshed. Most of the remaining additional need was directed to Service Centres as these are more sustainable locations than Other Settlements, particularly in relation to access to public transport, and provided greater opportunities to secure new primary school provision necessary to support development.
- 2.11.3. The justification for the higher proportion of new dwellings being delivered in Service Centres compared to the hybrid strategy relates to the provision of primary school education and the need to gain critical mass to support new primary schools in Anstey and Barrow upon Soar. The proportion of homes directed to Service Centres is still broadly aligned with the original hybrid strategy that was tested previously. It was nonetheless tested again through Sustainability Appraisal (TP/2 3.14 and 3.15).
- 2.11.4. See also answer to question 2.16 in relation to how this was informed by additional Sustainability Appraisal work and 2.17 in relation to primary school provision.

2.12 Does Policy DS1 set out a clear approach to the distribution of future housing and employment development across the different settlements in the hierarchy?

- 2.12.1. Yes, Policy DS1 establishes the amount of development to be distributed to the different settlements in Charnwood and implement the strategy of urban concentration and intensification with limited growth dispersed to other areas of the Borough. Policy DS1 explicitly establishes the overall amount of development to be provided and the location for the distribution of this development which reflects the settlement hierarchy identified in the Plan. The scale of development in different parts of the Borough prescribed by Policy DS1 is appropriate and justified, reflecting the role played in the overall development strategy.

2.13 Should the figures in the table in Policy DS1 be expressed as minimum numbers?

2.13.1. Paragraph 61 of the National Planning Policy Framework states that the calculated Local Housing Need figure is a minimum. Policy DS1 states, that after applying an allowance for flexibility to this figure, provision will be made for “at least 19,461 homes” (DS/2 page 30). The figures in the table in Policy DS1 should therefore be expressed as minimum numbers and a main modification is proposed in this regard. (Reference MAIN2.u)

2.14 Will the distribution of housing development set out in the table within Policy DS1 achieve the overall stated aim of Policy DS1 for urban concentration and intensification, as well as minimising the need to travel, particularly by private car, and to prioritise sustainable modes of transport?

2.14.1. The distribution of development set out within Policy DS1 prioritises development within and on the edge of our urban areas. The prioritisation for urban intensification is illustrated in site selection process that was undertaken and the consideration of sites with flood risk in town centre sites, see TP/2 paragraph 4.15.

2.14.2. The pattern of growth in Policy DS1 directs 81% of growth to urban areas which will achieve the stated aim of urban concentration. The settlement hierarchy evidence EB/DS/3 clearly demonstrates that these urban areas have the best access to public transport, and best access to a range of day-to-day services and will therefore achieve the stated aim of minimising the need to travel, particularly by private car.

2.14.3. Other reasonable alternatives which sought even greater levels of urban concentration were tested, but the strategy set out in Policy DS1 provides a balance, which provides urban concentration whilst allowing the most environmentally sensitive areas of the Borough to be protected TP/2 Table 1.

2.15 Is Policy DS1 justified in allowing for development adjacent to settlement limits in circumstances where a five year supply of deliverable housing land cannot be demonstrated? How would proposals be expected to accord with the pattern of development set out in the table in Policy DS1?

2.15.1. Policy DS1 (Implementation of the Strategy) seeks to provide clarity about how proposals for new housing will be considered in circumstances where the Council cannot demonstrate a 5-year supply of deliverable housing sites. Policy DS1 seeks to convey the key factors that have informed the overall development strategy, including a sustainable pattern of development and infrastructure delivery. Requiring development to adjoin the limits to

development is essential in maintaining the overall pattern of development set out in Policy DS1.

- 2.15.2. Policy DS1 is justified as it provides a framework for applicants and for decision makers in the event that a 5-year supply of deliverable housing sites cannot be demonstrated, therefore providing great certainty in decision making.
- 2.15.3. Policy DS1 set out the pattern of development in terms of the percentage of new homes directed to each category in the settlement hierarchy. The percentages in the Policy will be used by a decision maker to consider whether a proposal, together with other commitments accord with the overall pattern of development. Policy DS1 will be applied in conjunction with other policies in the Local Plan, notably Placed Based Policies (DS/2 Chapter 3), and together, these policies would inform whether the scale of a proposal is appropriate in a given location.

Policy SC1 - Service Centres

2.16 What is the justification for the level of growth being directed to Service Centres given the Sustainability Appraisal's finding (paragraph 5.1.2) that there is potential for negative effects above 1600 dwellings?

- 2.16.1. For the avoidance of doubt paragraph 5.1.2, referring to Service Centres, lies within Appendix G, rather than the main report of Sustainability Appraisal (SD/5). For clarity paragraph 5.1.2 of Appendix G is reproduced in full below:

“Somewhere in between a target of 1000 and 1600, there are no additional negative effects at all likely to occur, depending upon the choice and spread of sites. Presuming a small increase in growth at a range of settlements, this tweak to the strategy would therefore seem sensible as a minimum should higher flexibility in housing be sought. More substantial growth on locations that encroach Areas of Local Separation would mean that significant effects could arise, even within this range”

- 2.16.2. It is important to note the development strategy has sought to avoid, or mitigate significant adverse impacts, rather than any negative effects. It is also important to note paragraph 5.1.2 in Appendix G does not specifically place a threshold of 1,600 homes at which significant negative effects will occur. It notes such effects could occur if development is located in Areas of Local Separation, but the development strategy has sought to avoid such locations.

2.16.3. Paragraphs 5.1.3 to 5.1.5 go on to consider the significant negative effects that may occur at a level of 2,100 homes and 3,100 homes. This evidence combined infrastructure capacity information and site-specific evidence provide the justification for the level of growth being directed to Service Centres (TP/2 paragraphs 4.24 to 4.28 refers).

2.17 Are the site allocations in the Service Centres of Anstey, Barrow upon Soar and Sibleby (served by Cossington primary school) as proposed in Policies DS1 and DS3 justified when there is a lack of capacity in their respective primary schools? How would this be addressed?

2.17.1. In all service centres where new primary schools are proposed to serve new growth through the local plan a coordinated and evidence led approach has been followed. This follows constructive engagement with the Local Education Authority as set out in the Statement of Common Ground SC/6.

2.17.2. In each case a systematic process was followed which included the following stages:

- Calculating the yield of school pupils arising from the housing allocations;
- Calculating the distances to local schools within 2 miles;
- Assessing the capacity of local schools to accommodate growth;
- Assessing the scope for expanding existing schools to accommodate additional growth;
- Assessing the capacity of other schools in the locality to accommodate pupils;

Anstey

2.17.3. Site HA43, Land west of Anstey includes provision for 600 homes and a 1 FE Primary School. In addition, Site HA44, Fairhaven Farm includes provision for 47 homes. The total number of homes therefore allocated in Anstey is 647. The two primary schools in Anstey are Latimer (2 Form Entry) and Woolden Hill (1 Form Entry).

2.17.4. There would not be scope to expand either school, so the provision of a new school was agreed as the most suitable option. The local plan includes provision for the new 1 FE School on land within HA43, Land west of Anstey with developer contributions sought from HA44 (Fairhaven Farm, Anstey). Were a larger school to be required to accommodate larger numbers of dwellings then there is potential to provide for 2FE Primary School within the site.

Barrow

- 2.17.5. Current provision in Barrow is provided by the Hall Orchard CofE Primary School (2 Form Entry). The local authority has worked in partnership with the school over a few years to increase the size of the school on a phased basis. This is to meet increased births and the demand of housing that has already been granted planning permission. The final phase to increase the school to 3FE (630 places) is programmed to be completed by 2022/23.
- 2.17.6. There is no further capacity to extend the current school on its existing site and it is the only primary school within a two-mile walking distance of the proposed developments. Primary schools in the surrounding villages are forecast to be full or impacted by current housing growth and rising births.
- 2.17.7. The current pupil forecast for Barrow Hall C of E Primary School suggests that there will be 32 primary places available in the early stages of construction of the housing allocations (subject to year group required). However, if the forecast increases and these places are no longer available then additional funding will be required for temporary accommodation and/or transportation costs whilst the new school is constructed.
- 2.17.8. The Local Plan allocates land at HA43, Land off Cotes Road, Barrow upon Soar to provide a site for a new 1 Form Entry Primary School. Ongoing delivery discussions with the site promoters and the Local Education Authority have resulted in an alternative site on HA48, Land off Willow Road as the preferred option for the siting of the primary school land.
- 2.17.9. The land and build costs of the school will be shared between the developments that it will serve including all of the allocated housing sites in Barrow.

Sileby (Cossington)

- 2.17.10. Sileby is served by two primary schools: Redlands Community Primary School, (2 Form Entry) and Highgate Primary School, (1 Form Entry) In addition Cossington is a small 0.5 FE School within a 2-mile walking distance of Sileby and with a willingness to expand.
- 2.17.11. Redlands School has limited expansion potential because of the topography of the Site. There are plans to expand Highgate School to serve existing need but it would not be able to expand further to serve local plan growth as it is on a constrained site.

- 2.17.12. Following discussions with the Local Education Authority, it is accepted that a 0.5 FE extension (105 places) to Cossington Primary School would provide the additional places to serve local plan growth in both Cossington and Sileby.
- 2.17.13. The school would be sited on land to the rear of Derry's Garden Centre, Cossington (HA59) with the reasonable costs of making this provision to be shared amongst the developments that it would serve.

2.18 What is the relationship between the Service Centre category in the settlement hierarchy and the District Centre/Local Centre designation? Is there any potential for confusion about the role of the Service Centres?

- 2.18.1. There is no specific relationship between the settlement hierarchy and the retail hierarchy. The settlement hierarchy is evidenced by the Charnwood Settlement Hierarchy Assessment 2020 [EB/DS/3] which examines a wide range of factors as described in answers in relation to question 2.3 and 2.4.
- 2.18.2. The retail hierarchy is evidenced by the Charnwood Retail and Town Centre Study 2018 [EB/TC/S&F/1 - 1h] which provides a detailed assessment of the retailing credentials of each retail centre. The purpose of the retail hierarchy is to comply with the Paragraph 86a of the NPPF for the application of Policy T1.
- 2.18.3. District and local centres are long standing terms used in planning policy documents in Charnwood over many years. They are defined in the glossary of the NPPF, and they have a specific meaning in relation to the application of town centre policies. They are quite distinct from the terminology of 'Service Centre' and have quite different policy functions derived from national policy and the evidence base. It is considered that it would cause confusion for the public and officers alike to amend the definitions used in the local plan given the history of the terms and that the plan would then differ to the supporting evidence base. A change is therefore not considered necessary.

2.19 How would a 'proven local need' for off street parking in the last bullet of Policy SC1 be identified and is this part of the policy justified?

- 2.19.1. Evidence of need is provided in two car parking assessment studies commissioned by the Council - the Charnwood Car Parking Impact Assessment, 2015 and the Car Parking Site Availability and Deliverability Assessment, 2017. The first study assessed the availability of parking provision in the six service centres (plus Loughborough, Birstall, Shepshed and Thurmaston) both for on-street and off-street car parking to 2036. The second study provided a more detailed assessment of site availability and

deliverability in the service centres of Anstey, Barrow upon Soar, Quorn and Sileby, which along with the town centres of Loughborough and Shepshed, had been identified as having the greatest needs.

- 2.19.2. These two studies therefore provide the evidence of proven local need and would be used in conjunction with discussions with parish councils and with Neighbourhood Planning Groups in the production of Neighbourhood Plans.

Policy OS1 – Other Settlements

2.20 How would ‘small scale’ development in bullet two of the policy be defined and is the policy clear and effective in this regard?

- 2.20.1. There is considerable variation between the sizes of the 14 Other Settlements in the Borough and therefore the scale of development should be considered in the context of its general location and particular surroundings. The scale of any development proposal will need to be considered against other provisions in Policy OS1 and in particular that development should be within the defined Limits to Development. The policy will be applied through the decision-making process in conjunction with other policies in the Local Plan and the available guidance that is set out below. The policy is clear and effective in this regard.

- 2.20.2. The NPPF identifies two relevant definitions of small-scale development. Minor (non-major) development is in most cases defined as less than 10 homes or an area less than 0.5ha for residential development and additional floorspace of less than 1,000 sqm or a site of less than 1ha for non-residential development. In the specific case of entry level exception sites (paragraph 72) which should be proportionate in size to existing settlements, footnote 35 defines proportionate in size as not larger than one hectare in size or exceed 5% of the size of the existing settlement. In terms of the form of development, the National Design Guide defines scale as the height, width and length of each building proposed within a development in relation to its surroundings (paragraph 26, page 6). Further guidance on the scale of buildings is provided in Appendix 4 to the Plan (page 257).

- 2.20.3. A main modification is proposed to clarify the definition of small scale and its application in terms of Other Settlements. (Reference MAIN2.ac)

2.21 Why are proposals for new services and facilities required to meet a ‘proven local need’ (bullet four)? What would be the harm in approving new services and facilities without a demonstration of proven local need?

- 2.21.1. Other Settlements are small villages that have a primary school and have some of the services and facilities necessary to meet the day to day needs of

the community. If services and facilities were approved without a local need, this could be to the detriment of existing community services and facilities or could attract people from further afield. Such journeys would be disproportionately made by private cars given the nature of sustainable travel alternatives in these locations. The Policy should also be read in conjunction with policy T2 Protection of Community Facilities which aims to protect community facilities and support their enhancement.

2.21.2. It could be an undue burden for applicants to prove a local need and the intention of the policy would be satisfied by identifying that a local rather than more general need exists.

2.21.3. A main modification is therefore proposed to substitute the word 'identified' for the word 'proven'. (Reference Main2.v)

2.22 Should the policy give more support to development outside the Development Limits on brownfield or underused land?

2.22.1. Policy DS1 supports development that makes efficient use of land including using brownfield or underused land and buildings. The Policy also states that:

“The effect of our spatial strategy is that new built development will be confined to sites allocated in this local plan and neighbourhood plans, and other land within the Limits to Development subject to specific exceptions set out in this plan”.

2.22.2. Development outside the Limits on brownfield land would be subject to specific exceptions in the Plan, in particular Policies C1 Countryside, H5 Rural Exception Sites, E3 Rural Economic Development. Policy DS1 in combination with other policies in the Local Plan provide a clear decision-making framework to consider proposals for development on brownfield land outside the limits, and it is not considered that more support is justified.

Policy C1 - Countryside

2.23 How would 'small scale new built development' in bullet two of the policy be defined and is the policy clear and effective in this regard?

2.23.1. The scale of any development proposal will need to be considered against other provisions in Policy C1 and in particular that development should protect its largely undeveloped character, and its intrinsic character and beauty. Bullet point 2 of the policy also includes the provision that there are no significant adverse environmental effects. In order to make a judgement

against this policy, it invites a judgement about the effect of the proposal on its environmental context, notably landscape.

2.23.2. The application of the word 'small scale' in relation to Policy C1 relates to the form of development. In this regard the National Design Guide defines scale as the height, width and length of each building proposed within a development in relation to its surroundings (paragraph 26, page 6). Further guidance on the scale of buildings is provided in Appendix 4 to the Plan (page 257).

2.23.3. A main modification is proposed to clarify the definition of small scale and its application in terms of the Countryside. (Reference Main2.w)

2.24 What is the justification for requiring new services and facilities to meet a 'proven local need' (bullet three)? What harms would arise if new services and facilities are approved without a demonstration of proven local need?

2.24.1. Within the Countryside there are limited or very limited services to service the day to day needs of people living there. If services and facilities were approved without a local need, this could be to the detriment of existing community services and facilities or could attract people from further afield. Such journeys would be disproportionately by private cars given the nature of sustainable travel alternatives in these locations. The Policy should also be read in conjunction with policy T2 Protection of Community Facilities which aims to protect community facilities and support their enhancement.

2.24.2. It could be an undue burden for applicants to prove a local need and the intention of the policy would be satisfied by identifying that a local rather than more general need exists. A main modification is therefore proposed to substitute the word 'identified' for the word 'proven'. (Reference Main2. x)

2.25 Overall, will the Plan's vision and objectives contribute to the achievement of sustainable development and is the development strategy justified by the evidence and positively prepared? Are any main modifications necessary for soundness?

2.25.1. The Plans vision and objectives will contribute to the achievement of sustainable development as illustrated by the council's response to Matter 2, Issue 2. The development strategy is justified as illustrated by the council's responses to Issue 3. A number of main modifications are proposed which are necessary for soundness and these are set out in the main medication schedule.