

Title of Report	NEW LOCAL PLAN – STRATEGY POLICIES: CONSULTATION RESPONSES	
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Background Papers	<p>Draft North West Leicestershire Local Plan 2024</p> <p>Report to Local Committee Plan Committee – Draft Policies – 18 October 2023</p> <p>National Planning Policy Framework (publishing.service.gov.uk)</p> <p>Sustainability Appraisal – Strategy Policies S1-S5 Assessment Findings</p> <p>Need for Employment Land Report 2020</p> <p>North West Leicestershire – The Need for Employment Land July 2024 Update</p> <p>Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk)</p>	<p>Public Report: Yes</p> <p>Key Decision: Yes</p>
Financial Implications	The cost of the Local Plan Review is met through existing budgets. Signed off by the Section 151 Officer: Yes	
Legal Implications	The Local Plan must be based on robust and up to date evidence. Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	No staffing implications associated with the specific content of this report. Links with the Council’s Priorities are set out at the end of the report. Signed off by the Head of Paid Service: Yes	
Purpose of Report	To consider the comments made in respect of the Strategy Policies of the Regulation 18 Plan and to agree changes to the policies.	

<p>Recommendations</p>	<p>THAT THE LOCAL PLAN COMMITTEE:</p> <ul style="list-style-type: none"> (i) NOTES THE COMMENTS RECEIVED IN RESPECT OF STRATEGY POLICIES S1 TO S5; (ii) AGREES TO THE PROPOSED CHANGES TO THE PLAN OBJECTIVES AS SET OUT IN SECTION 3 OF THIS REPORT AND APPENDIX A; (iii) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S1 AS SET OUT IN SECTION 4 OF THIS REPORT AND APPENDIX B; (iv) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S2 AS SET OUT IN SECTION 5 OF THIS REPORT AND APPENDIX C; (v) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S3 AS SET OUT IN SECTION 6 OF THIS REPORT AND APPENDIX D; (vi) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S4 AS SET OUT IN SECTION 7 OF THIS REPORT AND APPENDIX E; AND (vii) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S5 AS SET OUT IN SECTION 8 OF THIS REPORT AND APPENDIX F.
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1 BACKGROUND

- 1.1 The Local Plan Committee of 18 October 2023 agreed the draft Local Plan policies for consultation purposes. The consultation was undertaken between 5 February and 17 March 2024.
- 1.2 A report to the 22 May 2024 meeting of this Committee received a report which provided an overview of the responses to the consultation in respect of the numbers and sources of representatives.
- 1.3 The draft policies were divided into subject chapters. This report is concerned with chapter 4 regarding Strategy. Further reports to this Committee will consider the other chapters and responses in due course.
- 1.4 The Strategy Policies have been subjected to Sustainability Appraisal by the Council's consultants. Their findings can be viewed from the link above. They are broadly supportive of the proposed policies. However, mitigation measures are suggested in respect of two policies. These are considered under the relevant policy in the respective section of this report.
- 1.5 As members will be aware the new government published proposed changes to the National Planning Policy Framework (NPPF) and also issued a number of other documents for consultation on 30 July 2024. The various documents can be viewed from the link above.
- 1.6 In preparing this report it has not been possible to take into account all of the proposed changes that could have implications for the policies in the Strategy chapter. Therefore, it may be necessary for future reports to address these. However, there a couple of issues which are of fundamental importance to the Local Plan.

Housing requirement

- 1.7 Currently the starting point for identifying a housing requirement is the outcome from the standard method. For this Council the figure is 357 dwellings each year. To this is then added any additional need to address a shortfall in provision elsewhere in the Leicester and Leicestershire Housing Market Area. In this instance the fact that Leicester City is unable to meet its own needs, particularly as the standard method included a significant

uplift to the requirements for a number of urban areas, including Leicester City. From this the requirement in North West Leicestershire is 686 dwellings each year.

- 1.8 Whilst the standard method is retained, how it is proposed to be calculated has changed. This sees a significant increase for North West Leicestershire from 357 dwellings to 621 dwellings. Similar increases are proposed for the majority of other Leicestershire authorities. However, the revised method now no longer includes the uplift for Leicester City and so the City's need is reduced significantly.
- 1.9 Discussions are required under the Duty to Cooperate with the other Leicester and Leicestershire authorities to fully understand the implications of these proposed changes. For example, it is not clear whether Leicester City will still have an unmet need or whether any other authorities will now have an unmet need as a result of these proposed changes. There is also no guarantee that these will be the final figures until later on the year when the government had considered the responses to the consultation. In addition, other work is taking place to consider the issue of the balance between homes and jobs in the district.
- 1.10 For the above reasons, at this time no changes are proposed to be made in respect of the housing requirement to be met as part of the Local Plan, but this matter will be kept under review as more information becomes available and will be addressed in future reports.

Date for submitting the Local Plan

- 1.11 Members will be aware that following changes to the plan making system agreed as part of the Levelling up and Regeneration Act 2023, that plans being prepared under the current system have to be submitted for Examination by the end of June 2025. The government is now proposing that this be extended to the end of December 2026.
- 1.12 This it be welcomed as it will provide more time to ensure that the Council has all the necessary evidence in place to secure a 'sound' plan. However, it is very important that progress on the preparation of the plan is maintained.

2 STRUCTURE OF THIS REPORT

- 2.1 The purpose of this report is to consider the responses received in respect of the Strategy chapter which included the Objectives and five policies.
- 2.2 The issues raised in responses are summarised and considered in the following sections of the report together with the relevant supporting appendix. In respect of some policies, a number of responses made the same or similar points and these are considered in the main report followed by a consideration of the issues and how the Council should respond.
- 2.3 In terms of each of the policies, they attracted the following number of responses:
 - Plan Objectives: 26 responses
 - Policy S1 - Future Housing and Economic Development Needs: 78 responses
 - Policy S2 – Settlement Hierarchy: 52 responses
 - Policy S3 – Local Housing Needs Villages: 10 responses
 - Policy S4 – Countryside: 19 responses
 - Policy S5 – Residential Development in the Countryside: five responses

3 PLAN OBJECTIVES

- 3.1 The draft Plan contains 11 objectives (pages 12/13 of the Proposed Policies document). These describe in overall terms what the Plan aims to achieve and provides an overarching framework for the policies which follow. Each of the draft policies contribute to at least one of the objectives.

- 3.2 The majority of the consultation responses are seeking to either add a further objective or to widen the scope of the existing objectives.
- 3.3 The feedback from the consultation feedback is set out at Appendix A and the following changes are recommended in response:
- Objective 4 (reducing the need to travel) – highlight the use of green infrastructure (footpaths, green links) where possible to connect homes, workplaces etc in response to a comment from Natural England.
 - Objective 8 (conserving and enhancing our heritage) – add reference to overall historic character in response to a comment from Leicestershire County Council (LCC).
 - Objective 9 (conserving and enhancing our natural environment) – add references to habitat connectivity and green infrastructure in response to Natural England and to Biodiversity Net Gain in response to the Environment Agency and Caddick Land.
 - Objective 11 (ensuring sufficient infrastructure) – add that access to services and facilities will be enhanced where possible in response to Sport England.

4 POLICY S1 - FUTURE HOUSING AND ECONOMIC DEVELOPMENT NEEDS

- 4.1 The feedback from the consultation feedback is set out at Appendix B.
- 4.2 The responses to this policy tended to fall into two opposing categories; those (principally developers and landowners) who considered that the housing and/or employment requirements should be higher and those (principally residents) who considered that the housing and/or employment requirements were too high.
- 4.3 The following considers some of the most common responses received from developers and landowners.

Housing requirements

Expressing the requirement as minimum

- 4.4 As currently written, Policy S1 does not provide any flexibility and the requirement appears as an absolute figure. The adopted Local Plan refers to a 'minimum' housing requirement. It is considered that it would be appropriate to refer to the requirement as a minimum.

Affordable Housing

- 4.5 A number of representations refer to the need to increase the housing requirement to assist in meeting the need for affordable housing.
- 4.6 The National Planning Policy Framework (NPPF) is clear that the outcome from the government's standard method is "an advisory starting-point for establishing a housing requirement for an area" (paragraph 61). The standard method includes a built-in adjustment to take account of affordability. This is recalculated on annual basis by government using data to ensure that "Local housing need responds to price signals" and "is set at a level to ensure that minimum annual housing need starts to address the affordability of homes" (Planning Practice Guidance Paragraph: 006 Reference ID: 2a-006-20190220).
- 4.7 The current figure for standard method for North West Leicestershire (February 2024) is 357 dwellings, some 15 dwellings less than that used to inform the Statement of Common Ground (SoCG) (372 dwellings). This reduction is because of a decrease in the affordability ratio used in the standard method.

- 4.8 The Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) identifies a need for affordable housing across the district of 382 dwellings each year (HENA table 9.40). This is more than the outcome from the standard method. However, the housing requirement proposed in the draft plan is 686 dwellings, some 304 dwellings more than the affordable housing need.
- 4.9 The HENA goes on to consider the issue of whether there is a need to uplift the housing need figure for the Housing Market Area. It concludes that there is not a case, although there may be a case for some flexibility as there is the prospect that the affordability ratio could worsen. As noted above, since the SoCG was agreed the affordability ratio has shown a reduction. This, together with the fact that the housing requirement significantly exceeds the need for affordable housing identified in the HENA points, therefore, to there not being a case to further increase the housing requirement for affordability reasons.

Plan period

- 4.10 A significant number of responses from developers and/landowners refer to the NPPF statement that “strategic policies should look ahead over a minimum 15-year period from adoption” (paragraph 22 NPPF December 2023).
- 4.11 The current Local Development Scheme envisages adoption of the Local Plan around October 2026. Therefore, this would require an end date of 2041, not 2040.
- 4.12 It will be noted that the NPPF uses the word ‘should’ rather than ‘must’. This suggests that there is some degree of flexibility in respect of this issue as otherwise it would be a specific requirement. There are examples from elsewhere where Inspectors have accepted a lesser plan period.
- 4.13 Extending the plan period by one or more years would have implications for some aspects of the evidence base, including both the housing and employment land requirements which would be increased. For example, for each year that the plan period was extended there would be a need to identify land for an additional 686 dwellings. Whilst it is likely that enough sites could be identified to achieve this, this would have consequences for other aspects of the evidence base, including transport modelling and the Infrastructure Delivery Plan, which are predicated on the basis of need to 2040. There would be an additional cost, both in time and money, to do this.
- 4.14 It is considered that adding in sites for an additional amount of housing and employment would also necessitate a further round of consultation under Regulation 18 in order to ensure that there is an opportunity to comment before the more formal Regulation 19 stage. Further consultation would add in further time to an already tight timetable based on the current Local Development Scheme which envisages submission by the end of June 2025. As outlined in section one of this report, the government is proposing to move this deadline back to the end of 2026. This matter will therefore require further consideration.

Looking ahead 30 years

- 4.15 As noted above, the NPPF requires Strategic Policies look ahead a minimum of 15-years. It goes on to state [emphasis added] “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery” (NPPF paragraph 22).
- 4.16 In view of the scale of the Isley Woodhouse proposal it simply would not be possible for it to be built out in its entirety in the plan period. Taking a longer-term view of such developments, as required by the NPPF, is necessary to ensure that development beyond the plan period is consistent with a longer-term vision in terms of matters such as

design and the provision of infrastructure; in effect ensuring that such a development is properly planned and not constrained by the end date of a plan. However, it does not require that the whole plan period be extended to at least 30-years.

The plan should be rebased to 2024

- 4.17 The current start date for the Local Plan is 2020. Updating the overall requirement to a 2024 date would be appropriate and is almost certainly likely to be required by an Inspector at Examination stage. The 22 May 2024 meeting of this Committee considered a report regarding the housing and employment land position as at 1 April 2024, but with a start date of April 2020. This identified a residual requirement of 5,490 dwellings. Table 1 below updates this to start date of April 2024.

Table 1 – Housing Land Supply position at 1 April 2024

		No of dwellings
A	Annual housing requirement	686
B	Housing requirement 2024-40 (A x 16)	10,976
C	10% flexibility allowance (C x 10%)	1,098
D	Total requirement (B + C)	12,074
E	Commitments from major sites (10+ dwellings) 2024 to 2040	6,436
G	Residual requirement to be allocated in Local Plan (D – E)	5,638

- 4.18 The effect of this is to increase the residual requirement by about 150 dwellings, a reflection of the fact that between 2020 and 2024 completions have exceeded requirements.

May need to take unmet need from elsewhere

- 4.19 Based on the current Statement of Common Ground (SoCG) no authority in Leicestershire other than Leicester City Council has declared an unmet need, although this may change in view of the revised housing requirement figures. Hinckley and Bosworth Borough Council has not accepted that the full unmet need from Leicester City apportioned to it in the current SoCG is appropriate. It will be for Hinckley and Bosworth Borough Council to justify this position as part of their Local Plan Examination process. Only if they are able to persuade an Inspector that their argument is correct would there be a need for the remaining unmet need to be apportioned elsewhere. This would have to be done through a revised SoCG rather than one authority unilaterally accepting any residual unmet need.

Why not use option 7b housing requirement figures?

- 4.20 The Council undertook consultation between January and March 2022. This set out a range of potential housing requirements (359 dwellings, 448 dwellings, 512 dwellings and 730 dwellings each year). At that time the two higher scenarios were judged as appearing “to cover the most likely future requirement until such time as the redistribution of unmet housing need from Leicester City has been agreed”.
- 4.21 The SoCG which addressed the issue of unmet need was published later in 2022 and included a figure of 686 dwellings for North West Leicestershire. The SoCG was agreed by this Council at its meeting in September 2022. Whilst the revised requirement has not been assessed in respect of the Sustainability Appraisal, this is currently being undertaken as part of the Sustainability Appraisal (SA) of the whole Regulation 18 plan.

General employment requirements

- 4.22 Draft Policy S1(2) details the amount of general employment floorspace needed over the plan period. The basis for these figures is the [Need for Employment Land Report 2020](#) (the ‘Stantec Report’). A number of representations raised issues with this study.

- It covers the period to 2039 whereas the plan end date is now 2040
- It is out of date. It was prepared in 2020 and does not fully reflect subsequent changes such as the impacts of Covid, growth in e-commerce and structural changes to operating practices; the forecasts it relies on are now out of date; it does not reflect market demand and actual levels of take up.
- A few representors argue that demand has been suppressed in recent years because of restricted availability of land. If this were taken into account, the requirement figures would increase.

4.23 In response, the Council's consultants were asked to provide a 'sense-check' update of the Stantec Report (this can be viewed from the link above - North West Leicestershire – The Need for Employment Land July 2024 Update). This is not a new employment land assessment, rather it is an update exercise to test whether the requirements are broadly reasonable taking account of more recent information. Also, as the original Stantec report covers the period 2017-2039, the following has been done as part of the update exercise:

- Extend the evidence to 2040, the end date of the Plan. Previously officers have estimated the figure for 2040; the update report now does this formally.
- The base date of 2017 is now some seven years in the past. The consultants have advised that a Local Plan Inspector is very likely to ask for the employment requirements to be rebased to (i.e. start from) 2024. There is little logic to retaining a start date of 2017, especially as this does not correspond to any other date in the plan. It is prudent to make this adjustment now when we have time to deal with any implications rather than waiting for the Examination to start. On one hand this adjustment means the employment land requirements are for a shorter period i.e. 16 years (2024-2040) rather than 23 years (2017-2040) but on the other hand, development completed in the period 2017-2024 will no longer 'count' towards the requirement.

4.24 The Update finds that "the conclusions and recommendations of the 2020 report were and remain soundly based, and this 2024 report applies broadly the same method to update the floorspace/land needed".

Table 2 – Comparison of the Stantec and updated requirements.

	Offices (sqm)	Industrial/non-strategic Warehousing (sqm)
Stantec Requirement (2017 – 40)	59,590	195,500
Updated Requirement (2024 – 40)	35,000	146,000

4.25 As previously, allowances/margins and planning permissions are factored in resulting in the residual requirement shown below. One difference is that a flexibility allowance for the office component has not been added this time. Given the widespread weakness in the office market, the Council's consultants advise that an additional uplift to provide flexibility for the office sector is not merited.

Table 3 – Updated Employment Land Requirement (2024-40)

		Offices (sqm)	Industrial/non-strategic Warehousing (sqm)
A	Rapleys requirement (2024 – 40)	35,000	146,000
B	Losses allowance (2026-40)	3,180	51,577
C	Flexibility margin	0	77,653
D	TOTAL REQUIREMENT (A+B+C)	38,180	275,230

F	Net permissions (incl. U/C)	14,644	77,436
G	Allocation (Money Hill)	31,980	42,640
H	TOTAL SUPPLY at 1 April 2024 (E+F+G)	46,624	120,076
	Residual requirement (2024-40)	-8,444 sqm	At least 155,154 sqm (=38.8Ha)*

* land areas calculated using the conversion factors ('plot ratios') from the Stantec study.

4.26 For comparison, the requirements based on original Stantec figures which were reported to the May meeting of this Committee are as follows:

Table 4 – Stantec Report Employment Land Requirements (2024-2040)

Residual requirement (2024-40)	Up to 13,391sqm (=2.23Ha) *	At least 117,183sqm (=29.3Ha)*
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4.27 For offices there is a decrease in the overall requirement compared with the [May 2024 Local Plan Committee](#) position to the extent that it appears that the existing land supply will more than satisfy office needs to 2040. This decrease is largely down to a simplification of the consultants' approach as they do not make technical adjustments they previously applied because the office market is relatively subdued and, for the same reason, the omission of the flexibility allowance that was previously applied. This suggests that the new Local Plan would not need to allocate additional land for offices but an important further consideration will be to review the current office land supply (sites with planning permission and the Money Hill allocation). This will be considered when the proposed site allocations are reported to a future meeting of this Committee.

4.28 The industrial/smaller warehousing requirement increases by some 37,971sqm compared with the position presented to the May meeting. In the main, this stems from rebasing the requirement to 2024 and the consequent omission of 2017-2024 completions (87,471sqm) from the calculation.

Strategic warehousing

4.29 Policy S1 will need to confirm how much additional strategic warehousing will be needed in the district to 2040. The draft policy references the forthcoming Leicester and Leicestershire Apportionment of Strategic Distribution Floorspace study as a relevant piece of evidence but unfortunately this study has not yet been published.

4.30 As with the housing requirements the comments tended to fall in to one of two categories:

- The Leicester and Leicestershire Strategic Distribution Study (2021) is out of date and its methodology results in an under-estimate of the need for strategic warehousing. Alternative approaches are put forward.
- In the reverse, some argue that the need figures are unrealistic (too high) and unjustified

4.31 Officers are seeking expert advice on some of these points. Overall, at this stage, officers are not yet able to make recommendations on this matter but will do so at a future meeting of the Committee.

4.32 The proposed changes to Policy S1 are included at Appendix G. Deletions are shown as crossed out and additions are underlined.

5 POLICY S2 – SETTLEMENT HIERARCHY

5.1 The feedback from the consultation feedback is set out at Appendix C.

5.2 The following considers some of the most common responses that were received.

Key service centres

- 5.3 A number of responses queried whether Ashby de la Zouch and Castle Donington should be given equal status in the settlement hierarchy. Some suggested that Ashby de la Zouch should have the status of a Principal Town and one suggested that Castle Donington should be a Principal Town.
- 5.4 Whilst Ashby de la Zouch does benefit from both more retail and leisure opportunities than Castle Donington, the latter benefits from the significant employment opportunities in and around the town, as well as a better level of public transport provision. Furthermore, Castle Donington is located within the Leicestershire International Gateway growth area identified in the Strategic Growth Plan for Leicester and Leicestershire. Therefore, it is considered that they both can be regarded as key Service Centres. Neither settlement has as extensive a range of services and facilities or population size as the Coalville Urban Area and so would not be appropriate as a Principal Town.

Sustainable Villages

- 5.5 A number of responses have raised issues regarding Sustainable Villages. Some question the status of Ravenstone and Appleby Magna in view of their proximity to the Coalville Urban Area and Mercia Park respectively. For the reasons set out in Appendix C no changes are proposed. Others have raised issues about the potential for changes in circumstances in terms of the availability of services and facilities. Part (3) of the policy as originally drafted recognised this in respect of the loss of services and facilities in Sustainable Villages. A new part (4) is suggested in respect of the unlikely event that a Local Needs Village gains services and facilities.
- 5.6 There is concern that the approach to Sustainable Villages is too restrictive and that without more growth services and facilities will continue to decline. The settlement hierarchy strikes a balance between allowing some development in Sustainable Villages and the need to reduce the need to travel by car. No change is proposed.

Status of Isley Woodhouse

- 5.7 Two responses make the point that as Isley Woodhouse does not exist at this time, that it should not be included in the settlement hierarchy. It is agreed that the inclusion of Isley Woodhouse in the settlement hierarchy is inappropriate at this time. However, part (2) of the policy is required to explain that it is an exception to the hierarchy policy. Future plans will need to consider where it lies in the settlement hierarchy (or similar).

Failure to refer to allocations outside of settlements

- 5.8 The point is made that the current wording only refers to sites within the Limits to Development. However, the policy fails to recognise that the emerging plan also, appropriately, includes other allocations that are and will remain outside Limits to Development, for example various employment designations. It is suggested that the policy should be amended or such sites should be within the Limits to Development. It is considered that the policy should be reworded.

Sustainability Appraisal

- 5.9 The Sustainability Appraisal identifies two potential significant effects arising from the policy.

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
SA12	Policy S2: Settlement	Significant Negative	A policy or policy wording protecting development on	Other policies in the plan address biodiversity. All

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
	Hierarchy		key biodiversity habitats or pathways, as well as incorporating a need for biodiversity net gain measures, could reduce the impact of development on biodiversity.	the policies of the plan have to be read together. Adding in additional requirements to Policy S2 would be an unnecessary duplication.
SA14	Policy S2: Settlement Hierarchy	Significant Negative	A policy or policy wording protecting development on the best and most versatile agricultural land could reduce the impact of development on land.	This will be addressed when considering other policies rather than as part of this policy in order to avoid unnecessary duplication.

5.10 No further changes are proposed to Policy S2 as a result of the Sustainability Appraisal.

5.11 The proposed changes to Policy S2 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

6 POLICY S3 – LOCAL HOUSING NEEDS VILLAGES

6.1 The feedback from the consultation is set out at Appendix D and the following changes are recommended in response:

- For the purposes of clarity and consistency, an amendment is proposed to part (1) to make clear that Policy S3 only applies to proposals for residential development in the local housing needs villages where they do not accord with Policy S5 (Residential Development in the Countryside) or do not comprise a rural exception site (Policy H6).
- An amendment to part (3) is proposed to make it clearer that any planning permission granted under the policy will require a legal agreement that:
 - o ties the occupancy of any dwelling to the applicant(s) for at least three years from the date of completion; and
 - o applies the local connection criteria at part (2) to the subsequent sale of the dwelling for the first three months it is on the market.

6.2 The latter has been added in response to concerns that the three-year occupancy period was too short, balanced with the fact that dwellings permitted under S3 will be sold on at some point and that it would be unreasonable to restrict the sale of an open market dwelling to someone with a parish connection in perpetuity.

6.3 The proposed changes to Policy S3 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

7 POLICY S4 – COUNTRYSIDE

7.1 Draft Policy S4 sets out the uses that will be supported in a countryside location as well as a number of criteria that development proposals in the countryside need to satisfy to be supported. The feedback from the consultation is set out at Appendix E and the following changes are recommended in response:

- It is proposed to amend criterion (g) to the sub-division of existing dwellings to be consistent with the NPPF.

- It is proposed that criterion (g) is amended to refer only to the replacement of residential dwellings to be consistent with policy S5 and a new criterion is added to Policy S4 to refer to extensions to existing dwellings.
- As currently worded only those proposed developments that accord with (1)(a) to (r) would be assessed against part (2) of the policy. It is proposed that Part (2) be reworded so as to apply to any development in the countryside.
- Part (2)(b) of Policy S4 aims to ensure that proposed development does not undermine the physical and perceived separation between settlements taking into account existing or proposed development. The criteria is somewhat lengthy and could be simplified. It is proposed that the wording is amended to make the requirement clearer and easier to apply when determining planning applications.
- Part (2)(d) of Policy S4 requires that new development is well integrated with existing development. However, this may not be possible in relation to criterion (h) of Part 1, which allows for employment land in accordance with the provisions of Draft Policy Ec4 as there is a potential conflict between the two policies. Therefore, it is proposed that Part(2)(d) be reworded to address this conflict.

7.2 The proposed changes to Policy S4 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

8 POLICY S5 – RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE

8.1 This policy sets out the instances where residential development may be appropriate in the countryside, including permanent and temporary rural workers dwellings and replacement residential dwellings. One of the responses submitted was the same as the response to policy S4. The feedback from the consultation feedback is set out at Appendix F. No significant issues have been raised but some minor changes are proposed as set out at Appendix F.

Sustainability Appraisal

8.2 The Sustainability Appraisal identifies one uncertain effect arising from the policy.

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
SA14	Policy S5: Residential Development in Countryside	Uncertain	Further detail within the policy wording to clarify if best and most versatile agricultural land could be developed is needed to determine the nature of the potential effect.	This will be addressed when considering other policies rather than as part of this policy in order to avoid unnecessary duplication.

8.3 No further changes are proposed to Policy S5 as a result of the Sustainability Appraisal.

8.4 The proposed changes to Policy S5 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

Council Priorities:	<ul style="list-style-type: none"> - Planning and Regeneration - Clean, green and zero carbon - Communities and Housing
Policy Considerations:	The Local plan is required to be consistent with the National Planning Policy Framework

Safeguarding:	None discernible
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan review will be undertaken as part of the Sustainability Appraisal.
Customer Impact:	No issues identified
Economic and Social Impact:	The decision, of itself, will have no specific impact. The new Local Plan as a whole will aim to deliver positive economic and social impacts and these will be recorded through the Sustainability Appraisal.
Environment and Climate Change:	The decision, of itself, will have no specific impact. The new Local Plan as a whole will aim to deliver positive environmental and climate change impacts and these will be recorded through the Sustainability Appraisal.
Consultation/Community Engagement:	The Regulation 18 Local Plan has been subject to consultation and further consultation will be undertaken at Regulation 19 stage.
Risks:	A risk assessment for the Local Plan Review has been prepared and is kept up to date. As far as possible control measures have been put in place to minimise risks, including regular Project Board meetings where risk is reviewed.
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