

Response to North Dorset District Local Plan Part 1 consultation January 2014

From Melbury Abbas and Cann Parish Council

Our response to the NDDC Local Plan Part 1 comprises the following general concerns:

- It runs counter to declared Government policy in various respects but particularly with regard to the need for economic development and to localism;
- It makes numerous assumptions and assertions for which objective evidence and data is not provided in support;
- It has been produced, and presented for consultation, whilst it appears that a good number of elements of the supporting detailed infrastructure document have not been made available to the consultees;
- It omits all mention of some infrastructure that would be necessary to support elements of the plan which demonstrate the infrastructure that is planned would work in conjunction with the wider existing but deficient infrastructure network;
- It appears to endorse, by way of omission, the non-provision of other infrastructure that has long been identified as essential to the wellbeing of the district, yet despite many formal concerns being raised has once again been ignored;
- It has failed to mention various alternative infrastructure provisions – even if only to evidence and justify why these options have not been pursued;
- It has inherent contradictions in policy which stem from the lack of a comprehensive understanding of what constitutes “sustainability” in a rural context;
- The supporting document (particularly Appendix A) is unclear as to the prioritisation of infrastructure projects.
- The restrictive nature of its planning areas will have a negative impact on the value and effectiveness of Neighbourhood Development Plans.

Further detailed comments on these issues and others are submitted below under each Policy number.

As all future planning decisions in the district will be taken over the next 15 years based upon this document it is of paramount importance that this document is amended to reflect the needs put forward by the locality through proper and detailed consultation and that it accurately reflects national government guidance.

At present, we do not consider that this is the case. In our opinion, much more evidence needs to be provided to support the assumptions and headline policies to ensure that they are robust and the whole vein of the plan needs to be written in a more positive and flexible manner in accordance with the NPPF. At present, the Plan reflects many of the previous Local Plan restrictive policies. Rather than enabling development unless there is a very good reason not to proceed, it seeks to restrain development and in some cases simply prohibit it, which is in direct contravention of the NPPF guidance.

The Local Plan should not be put forward for the process of Examination until full details with a robust evidence base is given to consultees to enable full understanding to those responding. Only then can a sound framework for the future of the District be achieved

Each policy is now taken in order below, where the Parish Council wishes to comment specifically at this stage.

Policy 1 – Presumption in favour of sustainable development.

Whilst this particular policy seems to reflect government guidance NPPF, a good number of the policies further into the plan are not written to positively reflect this overriding principle and will require rewording to be positive not negative, flexible not restraining and not unduly onerous to discourage the evolution of some development anywhere other than in four main towns across the whole District. This attitude of restraint is contrary to the general thrust of the NPPF and will in effect stifle the growth, and survival in some cases, of anywhere that is now deemed in the 'Countryside', unless the wording of policies is rewritten to reflect the intention of the NPPF and its definition of sustainable development.

At present, it places many obstacles in the way of any development outside of the settlement boundaries and therefore the presumption in favour of sustainable development is not followed throughout this Plan as it should be. The reality will be that if the individual policies that follow are not reworded appropriately, planning officers will have full opportunity to stop almost all development outside of settlement boundaries under the detailed policies for the next 15 years. This is itself will go against economic recovery in a District that relies heavily upon rural industries, tourism and local services for its future and this is contrary to the NPPF.

Policy 2 Core Spatial Strategy

At present this Policy only provides an overview and we will look to comment in detail in Part 2 of the Local Plan when further information and hopefully robust evidence is to be provided. However, we note that the definition and interpretation of 'sustainable' development is key here. We also note that the District determines sustainable development to primarily lie only within the four retained town settlement boundaries at this stage. However, it also notes that in the north of the District there is a concentration of villages in the immediate hinterland of these sustainable locations/towns and they rely upon the range of services nearby in the town centres. Therefore, we consider that these villages are also sustainable locations and appropriate for some future growth. We intend for the Neighbourhood Development Plan (NDP) to take account of local need and demand for appropriate growth in these sustainable locations and for settlement boundaries to be agreed as part of the NDP process. We do not consider that the current District Council assumptions on sustainable development are supported with evidence, positively encompass the whole district and therefore are not completely in line with national guidance. E.g. 6% development for the whole district outside of the four towns with settlement boundaries is not a balanced or supportable distribution of housing for the Plan period.

Policy 5 The Historic Environment p69

Whilst in essence the policy appears acceptable, it is worded so that is open to wide interpretation by officers. In our experience, the reality of this broad wording is that matters are then often dealt with in a manner that is contrary to the NPPF by narrow interpretation of this single policy to the exclusion of all others, which is contrary to the NPPF guidance.

Therefore, whilst we agree that the historic environment should be protected and enhanced where possible, we would wish to see the wording made clearer, to ensure that the future interpretation, once adopted, ensures pragmatism and a more balanced view be adopted, in line with wider NPPF guidance, i.e. the principle of 'harm outweighing benefit' is evidenced

and all policies are given weight and consideration, rather than this policy being considered over and above all others.

Policy 6 Housing Distribution p83

Policy 7 Delivering Homes p89

Policy 8 Affordable Housing p99

Policy 9 Rural Exception Affordable Housing p109

Policy 6-9

We do not consider that sufficient evidence has been provided to enable detailed consultation to take place on housing matters in general. Most of the next 15 years of housing is concentrated in expanding one town and very little provision with a lack of evidence provided has been made for a sustainable growth pattern in the areas outside of settlement boundaries. We will address this matter in more detail in Part 2 of the Local Plan and through the Neighbourhood Development Plan.

As in Policy 2 the District notes that many villages surround the four main towns, three of which are in the north, however, large single site extensions to Shaftesbury and Gillingham creating full new communities are provided for, but evolution and infill of existing sustainable locations around the towns in villages is largely ignored. We do not consider that this is the intention of the NPPF definition of sustainable development.

In itself, Shaftesbury's eastern extension development, already partly built out and occupied, has proven that large scale development on the edge of small towns, brings its own social and economic problems and is not sustainable.

Gillingham large scale development, as proposed, will be no different; as the supporting infrastructure needed to make it a successful and sustainable community, link with other towns and cross border have not been planned for appropriately or provided for within the locality itself. The impact of such large development on existing surrounding property, towns, villages and infrastructure has not been sufficiently considered or provided for. Rather than aid the local economy and markets it is more likely to restrict it by flooding the market with housing affecting demand, supply and pricing. Insufficient local employment exists already and little is proposed. Employers do not want to come to the area due to the lack of infrastructure and poor road and transport connections.

We object to these policies as proposed until sufficient detailed evidence can be put forward that demonstrates over 90% of housing proposed in four towns for the whole district over the next 15 years will successfully and sustainably meet the full district's needs, without detriment to the existing amenity of the towns and villages.

Additionally, District has not robustly or objectively evidenced that more small scale market and affordable housing in the 'countryside' is not required, to ensure the future vitality of these important communities. An oversupply of rural housing as suggested is not the local experience of our Parish. A more planned and phased growth pattern over the term of the Plan is needed to meet local concerns and demand. At present these needs of balanced

distribution and improvements in infrastructure appear to have been ignored. It appears that the District intends to rely upon neighbourhood development plans or site allocations in due course rather than follow NPPF guidance and encourage sustainable development across the district.

Affordable housing should not be concentrated on large estates, with little or no local facilities or amenities provided now and without expansion of facilities planned in the nearest district centre towns, or infrastructure provision to enable access to them.

These types of schemes have already demonstrated in reality the evidence of the social problems and unsustainable situations that they can cause, yet the District propose policies to continue to replicate large scale, single site development to meet housing numbers with the same deficiencies.

We do not agree with the distribution of housing for the next 15 years as proposed by the policies put forward. Shaftesbury's eastern extension is already well underway and over the next 15 years reasonable growth within the towns and the surrounding villages should be provided for. It should not all be accommodated on one isolated estate to the east of the town. 6 % of development is proposed for everywhere outside of the four main towns and we object to this and believe it is insufficient unless robust and objective evidence can be provided by the District to confirm otherwise; this proposal of 6% runs contrary to local views and needs.

Rural Exception Affordable Housing Policy 9 we object to on the grounds that it is overly restrictive, will stifle local growth, prohibit sustainability of the local and rural economy and therefore does not conform to the NPPF. The NPPF encourages rural affordable development unless there is a very good reason not to do so. This policy needs to be brought up to date with current thinking and conform to national guidance. We would expect the NDP to also reflect local demand, need and opinion on this matter in due course.

Policy 10 and 26 Gypsies, Travellers and Travelling Showpeople and Sites P118 and 297

A definite defined limit of the number of occupants needs to be specified on any given site and a maximum number of sites in any council area.

What is the policy in the event of an invasion of Roma gypsies from Europe?

Travellers from St James Common have been moved on – but for how long? If locals are to be able to benefit from its amenities again, notably walking and horse riding, it needs to be left vacant for some time to recover and paths re-established through the brambles. This overgrowth has occurred because farmers adjoining the common who have grazing rights are now (and have been for some considerable time) unable to benefit from these ancient legal rights. Policy 26 10.100 states "while having due regard to the protection of local amenity and local environment".

There needs to be a plan in place to deal with illegal encampments and a closer inspection of works that DCC carry out without any planning consultation.

What is the long term policy for replacing the Salisbury Road site whose temporary 10 year plan expires in less than 9 years? In the long term where is the site going to be moved to enable the construction of the long awaited and much needed Shaftesbury and Melbury

Abbas by-passes? This needs to be decided now and steps taken to plan it, sensible alternatives to the site off the A30 were made at the time and would have been long term.

There is the question of inconsistencies in the approach and implementation of policies by NDDC/DCC regarding location of travellers' sites. This also needs to be addressed and criteria laid down. At present it appears that a site next to industrial land at Sturminster Newton will affect its potential but a site next to industrial land at Shaftesbury will not!

Policy 11 The Economy p 123

"National Policy 11 says that local authorities should plan for the 21st century to meet the needs of business and to create jobs".

First priority therefore must be to ensure that North Dorset has the infrastructure i.e. good road links to the south of the county, re-instating Semley Station would take pressure away from Gillingham.

At the same time, high-speed broadband is essential to business in the county and for future inward investment of business and employers – there needs to be a review of the options available and release of the BT stranglehold.

A proactive plan needs to be put in place to encourage further entrepreneurial ventures to the rural area, Virginia Hayward, Melbury Stone and Melbury Vale Winery are fine examples and there is scope to develop redundant buildings or change the use to more successful venture that would aid the economy. Similarly, existing businesses in and outside of towns should be encouraged to expand and aid the local economy not restrained, this needs to be incorporated into this Plan if North Dorset is to survive and grow. The plan needs to be positive in this regard and minimise red tape.

Help should also be available for start-up and home based businesses, with an ageing population in the area and people taking semi-retirement younger due to recession or personal wealth and live/work balance. This demographic and part of our society has a wealth of skills that want to continue working, as we live longer and they can contribute to the future and success of the local economy.

At present, the general wording of the Plan is restrictive and negatively written which is not in accordance with the NPPF guidance.

Sustainable Tourism – North Dorset economy relies heavily on tourism for its income and future growth. More could be made of the seasonal events such as The Great Dorset Steam Fair, Larmer Tree and Gillingham and Shaftesbury Show by having a co-ordinated "flag waving" approach and attracting more visitors to use the local B & B's and hostels. Therefore, the wording of the policy needs to be more encouraging and less restraining in the 'Countryside' to ensure that tourism enterprises can spread and grow to aid the economy.

The new railway linking Blandford and Sturminster Newton is a resounding success and needs to be continued to Stalbridge and cycle friendly routes to Gillingham and Shaftesbury need to be included in the local plan now.

Safe Cycling and Walking has to be high priority and is healthy leisure time activity in rural areas to be encouraged.

There needs to be a holistic approach to encourage businesses to the area and to create the environment that people want to live in the 21st century, not policies that advocate general restraint which is contrary to NPPF guidance.

Policy 12 Retail, Leisure and Other Commercial Developments p 133

The general objection to this policy is that it centres around the four towns with settlement boundaries, but appears to fail to make detailed provision for or encourage leisure, retail and commercial development outside of these areas; which constitutes a large part of the district contributing to the economy. This needs to be addressed to conform with national guidance that encourages such development and District policy should not unduly restrict it. Local services, retail, leisure facilities and commercial businesses are spread across the district and appropriately so in most cases. These should be provided for and allowed to grow, expand and aid the local economy recovery.

In relation to town centres and rural areas, road infrastructure and parking plays an important part; and these policies need to interlink and support Policy 12, but they do not appear to do so. Coach access and parking needs to be addressed as the town centre and rural economy would benefit commercially from further tourism visits. We hope that these matters will also be addressed through the Neighbourhood Development Plan too as it progresses, but as the NDP also needs to meet National and District guidance it should be brought to the attention of NDDC at this time.

Policy 13, 14 15 Infrastructure

In the previous NDDC plan the Melbury Abbas by-pass route was protected and it is essential to future development that it is protected in this new plan. During the period of the last plan several poor decisions were made by officers of NDDC and DCC which affected the future of North Dorset and democratically elected members were coerced into endorsing them. Little relevance was given to consultations or public opinion (300 objections and no one in support of the site).

Current Demand

- 1) The S & D Railway closed in the 1960s removing an alternative route to the South Coast for holidaymakers and resulting in the north south flow of 4000 plus tons of freight a week being transferred to the road, which has now very likely doubled or trebled.
- 2) The large expansion of the Port of Poole has resulted in a lot more freight going to Bristol, South Wales, West Midlands & North West England via the A350/ C13.
- 3) The continued expansion of Bournemouth International Airport.
- 4) The much greater flow of holiday traffic & visitors to for instance N T properties Stourhead & Kingston Lacy

5) The large number of improvements to the A350 in all of Wiltshire which encourages a greater flow of traffic and all drivers expect a road of the same standard in Dorset!

6) The present road is dangerous as the BVM article states, not all vehicles succeed in their quest to drive along the cart track that masquerades as a main road. The A350 and the C13 were Turnpike Roads with the A350 designated as the main arterial route.

Future Demand

Verbally Officers of NDDC have been saying that the roads in North Dorset will support the needs and growth forecast in the draft plan. The Buro Happold report, which is quoted, provides the data, together with the details of housing expansion, that the roads will not support any future housing expansion. In fact they will not support the fulfilment of existing developments. There is no evidence base in the plan that justifies the assumptions it makes.

The pinch point figures for the C13 given in the Buro Happold report for 2026 are 486 vehicles / hour. The figures produced by DCC in April, 2013 show 555 vehicles / hour, so the flow has increased beyond the 2026 prediction by some 15% in 2013!! This figure was calculated on the basis of a total new housing growth figure of 7,000 units. The actual net new units for the period 2006-2012 is 2,015. It is quite clear that the roads will not cope when the housing numbers are actually reached let alone with the plans to build more units over and above the figures shown.

The estimate of the increased traffic flow is badly understated and will still have considerable further complications when planned improvements to the A303 take place. It is anticipated that traffic travelling to Dorset will transfer to the A303/A350 to avoid long hold ups in the Ringwood area M3/M27/A31. The roads in Wiltshire and Somerset will cope – not so Dorset who have been left miles behind.

A further imbalance in the priorities is shown by putting the relief road at Enmore Green ahead of the A350/C13 corridor as it is not part of the main strategic route.

There appears to be no liaison with adjacent Counties in forming a strategy for traffic movements! It is vital that we have a co-ordinated approach if we are to have relief for the communities along the A350/C13 corridor but there is no strategy shown. The wish list that forms much of this plan cannot be achieved, including provision of local jobs, until there is a strategy. Dorset has a port that has seen investment but has no North South link. Companies seeking to relocate or expand and needing a port will prefer Portsmouth or Plymouth and the current emphasis on an East West route encourages this. NDDC need to do much more to support our potential. Lip service will not achieve results. Within the draft plan the C13 is listed as critical with no plan to do anything about it.

Part of the report shows that the route of the Shaftesbury By-Pass is protected under the plan. Under the previous one the route of the Melbury Abbas By-Pass was protected and over £2 million of investment was put in with detailed plans including environmental impact reports prepared and accepted. The Shaftesbury By-Pass and the Melbury Abbas By-Pass formed part of a much needed North - South route through Dorset and are linked. Protecting one without any plans to rectify the problems caused by completing a 'U' turn on the provision made in the last plan renders it pointless. We are told there is no money available, the simple fact is NO APPLICATION HAS BEEN MADE at a time when the Government is spending more on roads than at any time in the last 50 years. This not only frustrates us but also our MP Bob Walter.

There has been decades of lip service to an obvious problem and once again NDDC have come up short on solutions and any form of plan by failing to show support for local communities.

Having protected a route a more determined approach should be made to achieving the improvements before any further developments take place.

Policy 20 Countryside

Whilst in essence the policy appears acceptable, it is worded so that it is open to wide interpretation by officers. In our experience, the reality of this broad wording is that matters are then often dealt with by narrow interpretation of this single policy to the exclusion of all others, which is contrary to the NPPF guidance.

Therefore, whilst we agree that the Countryside should be protected and enhanced where possible, we would wish to see the wording made clearer, to ensure that the future interpretation, once adopted, ensures pragmatism and a more balanced view be adopted, in line with wider NPPF guidance, i.e. the principle of 'harm outweighing benefit' is evidenced and all policies are given weight and consideration, rather than this policy being considered over and above all others.

Having removed all settlement boundaries for the District bar four main towns, most of the District now falls under 'Countryside' according to this Plan with a policy of restraint on development. The only other option for the 'Countryside' is to develop Neighbourhood Development Plans and site allocations. Few are doing this as many of the smaller towns and villages do not have the resource or finance to produce such plans, therefore it is critical to the future of the District that this policy does not become simply an implement to say 'no' to all development anywhere other than in the small number of towns with settlement boundaries.

Policy 21 Gillingham Strategic site allocation

The Parish Council wishes to object to the policy on the grounds that it has not properly considered the wider reaching impact on the already inadequate transport and road network infrastructure. In general the plan should ensure that any policies dovetail and overlap with neighbouring towns and cross border councils. Sufficient enhancement of the commuting road network to the east (Shaftesbury) and south of Gillingham have not been considered. This large scale additional development needs investment in the surrounding roads and transport links, as the impact on neighbouring towns and development will be substantial as well as the adverse impact on the existing property market due to an over-supply of housing in one location.

Policy 23 Parking

Existing parking facilities are not an issue in this Parish, however, in the nearest town centre of Shaftesbury car parking facilities need to be managed more efficiently in terms of town centre parking turnover and longer stay car parking on the town fringes. This will aid the economy by allowing more short stay shoppers and tourists to make use of the town outlets and facilities. In our opinion, this option should have been exhausted prior to allowing the development of more car parking in town centres. Where district or neighbourhood retail

outlets are positioned, sufficient short term car parking should be provided to ensure the convenience nature of the outlet and aid its turnover and success, adding to the local economy.

Policy 25 Amenity

A key area within this section is the potential impact of development on amenity and the policy states that there is limited guidance on amenity issues. (10.71)

The wish is stated that any new development will not have an adverse impact on the enjoyment of privately or publicly owned land and that the amenity of potential occupiers of new development is not likely to be compromised by their surroundings and general environment. Elements of this strategy include:

Privacy and private open space: Sunlight and daylight: Artificial light intrusion: Noise and vibration: Unpleasant emissions (such as odour and fumes) (10.72)

In relation to the development east of Shaftesbury on the north side of the A30 problems relating to open spaces were not addressed as the development progressed and many opportunities were lost as amendments and further planning applications were submitted. Clearly there needs to be a co-ordinated approach to such developments with planned open spaces being completed as the works progress and this needs to be written into any conditions imposed.

The stated elements to be considered on any new large scale development also affect the surrounding area. (10.72)

All new developments should have to have an 'Impact Assessment' on the infrastructure to include Medical facilities (Capacity), Schools (Capacity), Available local employment (Job opportunities and vacancies) and Roads.

At present the road infrastructure will not cope with any new development and taking into the account the lack of industrial expansion and the amount of unused employment land it is likely that the occupants of any new development will have to travel for work and the closest major source of employment is within the conurbation of South East Dorset. Housing costs in this area are generally higher than North Dorset so families will be attracted to the area with workers commuting.

Traffic flow figures are shown under the submission relating to Policies 13, 14 and 15.

At present the level of traffic together with HGV's is causing considerable damage in Melbury Abbas The population of the village have no footpath alongside the road to access friends neighbours and local facilities and have to use the edge of the highway and verges. These verges are churned into mud by the weight of traffic. Banks in Dinah's Hollow leading to the village have suffered impact damage as has the Church Bank, which is a contributory cause of numerous landslips. The erosion of the banks has caused a rut alongside the highway causing the flow of water to miss the drains and flood the road at the bottom and the entrances to the adjacent cottages.

It is a traffic bottle neck with HGV's causing noise and vibration together with pollution caused by exhaust fumes.

NDDC have made Dinah's Hollow subject to a woodland protection order but are not following this up in spite of claims that the environment and areas of special interest should be protected for future generations.

The draft policy document states that the road conditions are 'critical' but plans no action other than further development to worsen the situation.

More work needs to be outlined in respect of this important policy.

Policy 27 Retention of Community Facilities.

This policy should be worded as strongly as possible to retain and enhance community facilities wherever possible in the rural communities and expand them where need or local demand is shown. Unreasonable hurdles and requirements to demonstrate need, expansion or redundancy should be removed and remaining requirements not be unduly onerous. The detail of what evidence would be required to demonstrate these cases is not clear and this should be provided with flexibility, in accordance with the NPPF, offering more weight to local voices.

Policy 28 Existing Dwellings in the Countryside

Objection on the grounds that the policy is not sound. It runs contrary to the positive and encouraging wording of the NPPF to allow flexibility for sustainable living. Whilst the plan suggests at the outset that it will follow 'this golden thread' of the NPPF, the individual policy wording then states the opposite, offering the same hurdles and restrictions as the previous plan policies. Some individual NDDC policies do not appear to have moved on with the change in government guidance and need to be reviewed and reworded to reflect the intentions of the NPPF, sustainability and less restraint. This is to ensure people can live their lives in a more sustainable fashion and to ensure the vitality of rural communities survives as settlement boundaries have all been removed. Therefore development should be encouraged unless there is a very good reason not to and the NPPF makes provision for such circumstances and gives examples.

Policy 29 The Reuse of existing buildings in the countryside p 313

Objection on the grounds that the policy detail is not sound. It runs contrary to the positive and encouraging wording of the NPPF to allow flexibility for sustainable living and to support a thriving rural economy. Whilst the plan suggests at the outset that it will follow 'this golden thread' of the NPPF. The individual detailed policy interpretation then states the opposite, offering the same hurdles and restrictions as the previous plan policies. Some individual NDDC policies do not appear to have moved on with the change in government guidance and need to be reviewed and reworded to reflect the intentions of the NPPF, sustainability and less restraint. This is to ensure people can live their lives in a more sustainable fashion and to ensure the vitality of rural communities and businesses survive. For example the definition of 'isolated' should be flexibly interpreted.

To state anything outside of the four main town boundaries is in the countryside and therefore isolated is wrong. Many people live within 2km of a main town or large village all with services, next to other dwellings and are not isolated. Some of these locations are still within a town settlement boundary, others are not. They use the same services and needs as those who are. Therefore development should be encouraged within a reasonable

distance of a town/village centre, in order to meet the more overarching aims of the NPPF and not be restrained, discouraged or excluded by the background detailed interpretation of certain policy and underlying NDDC approach of restraint, which is contrary to the aims of the NPPF, which already makes provision for circumstances of exclusions and gives examples.

Policies 30-33

Policy 30 Existing Employment Sites in the Countryside p 321

Policy 31 Tourist Accommodation in the Countryside p 325

Policy 32 Equine-related Developments in the Countryside p 330

Policy 33 Occupational Dwellings in the Countryside p 337

In general these policies are restrictive and written negatively; and do not reflect the sentiment of the NPPF, which is written positively and encourages such development unless there is a very good reason to say no. The countryside needs to thrive and with such restrictive policies North Dorset villages and rural communities will not survive or grow.

The NPPF does state "Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new ones". In light of recent government guidance on permitted development rights re-emphasising that planning constraints and red tape should be reduced to help stimulate the economy, policy 33 places far too much emphasis on what was a conventional agricultural worker and still refers to old guidance for assessment, with too many constraints.

Many of these workers live and work in diversified businesses and the economy and world has moved on, this policy needs to reflect these circumstances and the flexibility in government guidance to aid such businesses, and the argument of harm over wider benefit needs to be the basis of assessment. 'Other' rural based businesses seem to have been given little attention, but the sustainable principle of living where you work appears to have been disregarded and is restricted and this is contrary to NPPF. The district's understanding of 'sustainable' within its policies needs to be readdressed to conform with national guidance. All plans should include definition of problems that need to be addressed and a schedule for delivery and in a proper order. This plan identifies problems but does not address them.

There is no objective evidence provided to support the assumed limited growth in all areas of the District outside of settlement boundaries, if policies are more flexible successful economic growth, distributed more evenly across the district could be achieved, supporting a good number of other policies and national guidance, but this will not happen if policies unduly restrict it.

The 'golden thread of sustainability' should run through all the policy document and accord with the definition in the NPPF Resolution 42/187 Of the United Nations General Assembly, which defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. These proposed policies do not do so and need to be reworded to come in line with new National guidance, with a broader and more pragmatic approach, not automatic restraint.