

MATTER 2 – CONFORMITY WITH THE ADOPTED CORE STRATEGY (JUNE 2011) AND WITH NATIONAL PLANNING POLICY

Conformity with the Adopted Core Strategy

Proposed Housing Allocations – including Housing Supply and Delivery issues in light of the Government’s requirement for a Five Year Land Supply; spatial approach; site selection; contingency sites; rural housing supply; Housing Delivery Framework at Appendix 2 of the Submission DPD

The discussion will focus on the proposed Housing Allocations in the context of the requirement for a Five Year Land Supply, the current position regarding the Five Year Land Supply and Housing Delivery in North Lincolnshire (including completions since the adoption of the Core Strategy DPD and in earlier years, and projected completions), the mechanisms for the release of contingency sites and the current position regarding the Lincolnshire Lakes proposal and related Area Action Plan. (NLC/Home Builders Federation/Lucent Group/Moorwalk Limited/Firecrest Land Limited)

Housing Delivery North Lincolnshire

Objectively Assessed Housing Needs

The Yorkshire and Humber RSS outlined an overall housing requirement for North Lincolnshire between 2004 and 2026 of 15,700 new dwellings which was phased into two periods. In the first period (2004 to 2008) North Lincolnshire was expected to provide 2,200 new dwellings at a rate of 550 per year. Then in the second period (2008-2026) the area was expected to provide 13,500 new dwellings at a rate of 750 dwellings per year. The Core Strategy was drafted two years into the RSS second period for housing delivery.

In 2012 the Council commissioned consultants GVA to produce an updated Strategic Housing Market Assessment (HOU02) to objectively assess the housing requirement for North Lincolnshire and ensure that housing targets identified in Core Strategy are still robust and relevant to North Lincolnshire's housing needs. The assessment considered four scenarios which included the following:

- Scenario 1: SNPP 2008 (13,107 projected household projection change between 2010- 2026)
- Scenario 2: Migration- led (10,750 projected household projection change between 2010- 2026)
- Scenario 3: Baseline Employment (11,049 projected household projection change between 2010- 2026)
- Scenario 4: SHG Employment (16,844 projected household projection change between 2010- 2026)

It was evident from the analysis undertaken within the SHMA that the Core Strategy housing requirement still represents a level of growth which will match and potentially exceed the household pressures identified within Scenarios 2 and 3. This level of growth will enable the economy of North Lincolnshire to grow at the pace and level forecast under the baseline run

of the Regional Economic Model. This model factored in that significant employment growth would take place at the South Humber Gateway that North Lincolnshire should plan for.

The strong alignment between the level of growth projected under Scenario 2 and 3 provides a strong level of confidence that the housing requirement under the Core Strategy continues to represent the objectively assessed need for which to plan and ensure the availability of suitable land for future residential development. Scenario 3 also aligns well with the principles of the NPPF which supports the needs for the planning system to encourage and facilitate development of the economy.

Scenario 4 illustrates that additional demand for housing could result from the South Humber Gateway. It however proposes that the vast majority of new workers would choose to live in North Lincolnshire only and this does not provide a true reflection of the housing market. This scenario is considered to represent a maximum level of the demand and through discussion with neighbouring authorities as part of the duty to cooperate support was reached that Scenario 4 represents an unfair reflection of the housing market position.

This evidence of objectively assessed needs demonstrates that the Core Strategy housing requirement is still robust and there is no requirement to apply higher figures through this DPD.

Five Year Housing Land Supply

According to the National Planning Policy Framework (NPPF), Councils should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their requirements.

The Council have produced a paper which identifies a supply of specific deliverable sites sufficient to provide five years worth of housing against the requirement for North Lincolnshire. The first stage of the assessment was to identify the overall housing requirement for North Lincolnshire. Adjustments were made to reflect the level of housing that has already been delivered within this period.

Housing completions since 2004 are shown in the table below:-

Calculation of the 5 year supply

	Component	How is this calculated?	Total
a)	Requirement 1 st April 2004-31 st 2026	Core Strategy Requirement from start of plan period to 31 March to 2026 (2004-2008=550 dwellings per annum, 2008-2026=750 dwellings per annum)	15,700
b)	Completions from 1 st April 2004 to 31 st March 2014 2004/2005=551	Housing completions from the plan period to 31 st March 2014	5,079

	2005/2006=1160		
	2006/2007=688		
	2007/2008=480		
	2008/2009=337		
	2009/2010=302		
	2010/2011=457		
	2011/2012=399		
	2012/2013=326		
	2013/2014=379		
c)	Residual Requirement	a - b	10,621
d)	Less North Lincolnshire total commitment within settlements not included in the spatial distribution for the future housing requirement	32 dwellings	10,589
e)	Residual Requirement / 12 years	10,589 / 12 years	883
f)	Annual Requirement * 5 years	883 * 5 years	4415

The annual requirement for North Lincolnshire is 883 dwellings per year.

Projected completions set out in the housing trajectory are shown in the attached spreadsheet.

Defining the appropriate additional buffer for the five year supply target

NPPF paragraph 47 requires that the five year supply of housing should be supplemented by an additional buffer of either 5% (moved forward from later in the plan period) or 20% where there has been a record of persistent under delivery of housing.

The PAS Guidance 'Ten Key Principles for owning your housing number - finding your objectively assessed needs' states that a decision needs to be made as to whether the 5% buffer needs to be increased to 20%. This is required when there is persistent under delivery. Calculations should be based on an analysis of completions against previous requirements using data representative of the whole economic cycle, which may be from the last 10 years.

North Lincolnshire Council has adopted the PAS guidance to calculate which buffer should be included within the five year housing land requirement. Over the past 10 years 5,079 additional dwellings have been completed within North Lincolnshire. This equates to 76% of the total housing requirement of 6,700 dwellings. The residual target for this period has been spread across the remaining plan period up to 2026. This approach helps spread out the fluctuations of housing provision and also recognises that targets are often identified to be met over the plan period and annual targets are often only indicative.

A report has been produced which sets out North Lincolnshire Council's position in relation to a five year supply of deliverable housing sites in North Lincolnshire taking into account the requirement of the NPPF. This is the first five year housing land supply document produced by the Council and covers the period 1 April 2014 to 31 March 2019. The document demonstrates the delivery of committed and future development sites identified in the Council Strategic Housing Land Availability Assessment (SHLAA) which contributes to a rolling five year supply of deliverable land for housing in North Lincolnshire. This report states that North Lincolnshire currently has a 5 year housing supply of deliverable sites during the period April 2014 to March 2019.

Mechanism for the release of Contingency Sites

As stated in Policy CS8 of the Core Strategy 6,000 dwellings were to be provided in the Lincolnshire Lakes area through the Area Action Plan (AAP). In Appendix 2: The Housing Delivery Framework of the HELAPD it states 5,000 dwellings will be provided up to 2026. Paragraph 3.37 states in the Core Strategy policy that 6,000 houses will be provided within the Lincolnshire Lakes area and that it is to be delivered through the development of a specific AAP which is currently being produced. Therefore 1,000 dwellings will now be provided in the Lincolnshire Lakes area post 2026. This is due to slower housing delivery rates than anticipated in the Core Strategy (due to the national economic downturn).

At the Core Strategy Examination in Public it was agreed and stated in Policy CS7 that in order to provide flexibility in the delivery of housing that the Council would allocate contingency sites through the HELADPD to deliver 1,300 additional dwellings within the Scunthorpe Urban Area. In order to cover this shortfall contingency sites have been allocated in case of any under delivery. Policy CS7 also states if over any continuous three year period the net additional housing requirement varies by more than 20% the allocated contingency sites will be brought forward.

Contingency sites SCUH-C2, SCUH-C5 and SCUH-C7 identified in the HELADPD will be brought forward as the Lincolnshire Lakes Project will not deliver the projected 6,000 dwellings as stated in Core Strategy Policy CS7 before 2026 as anticipated therefore the need for the contingency sites to be brought forward is required.

Lincolnshire Lakes Area Action Plan and Lucent Planning Applications

There are four planning applications that have been submitted to North Lincolnshire Council in relation to the Lincolnshire Lakes. The four Lincolnshire Lakes planning applications (ref: PA/2013/1000 - 1003) submitted by Lucent were validated on 19.08.13.

PA/2013/1000= Outline application, with all matters reserved with the exception of access, for the development of up to 3,000 new homes including a care/retirement home (use class C3/C2), a 3 form of entry primary school (Use Class D1), a village centre (Use Class A1, A2, A3, A4, A5, B1), community facilities (D1), new roads and footpaths, informal areas of open space, play areas and sports pitches and new wildlife habitat, lakes and wetlands.

PA/2013/1001= Outline application, with all matters reserved with the exception of access, for the development of up to 500 new homes including a care/retirement home (Use Class C3/C2), a village centre (Use Class A1, A2, A3, A4, A5, B1, D1), a health care facility (Use Class D1), community facilities (Use Class D1), new roads and footpaths, informal areas of open space, play areas and sports pitches.

PA/2013/1002=Application in full for highway works to deliver the new terminating junction to the M181 motorway (due to the de-trunked section of the highway to the north of the terminating junction) and the development of the western section of the east west link road.

PA/2013/1003= Outline application for a commercial park comprising Use Class A1 (food and non-food), A2, A3, A4, A5, B1, C1 and D2.

The applications were presented at the 22nd October 2014 Planning Committee and were approved subject to Section 106 agreements. The Heads of Terms for the Section 106 is being presented at the 17th December 2014 Planning Committee.

The Lincolnshire Lakes AAP Submission Draft 2014 is out for consultation from Thursday 30th October until Thursday 11th December. A number of public consultation events have been carried out as part of this consultation period. During the public consultation period the Council received 173 representations from 46 consultees.

Residential Monitoring – focusing on paragraphs 3.338-3.341 of the Submission DPD, and the evidence base documents underpinning that data, and the Monitoring Framework at Appendix 1 of the Submission DPD

The discussion will focus on the Monitoring Framework and related Indicators and Targets with reference to the contingency sites. (NLC/Home Builder Federation)

The Residential Monitoring Framework contained in Appendix 1 of this DPD shows the relationship between the Core Strategy and the Housing and Employment Land Allocations monitoring indicators. The Core Strategy Policies CS7 and CS8 identify the housing requirement for North Lincolnshire and the percentage split of this requirement between Scunthorpe and the Market Towns. Three indicators have been identified to monitor if the housing requirement is being delivered on the specific site within this DPD.

Indicator: Ensure a five –year supply of deliverable sites is maintained

The HELADPD has been developed to ensure that North Lincolnshire has a continuous five year land supply to deliver the housing requirement set out in the Adopted Core Strategy. The HELADPD housing allocation and commitments have been split into the following three phases:

Phase 1: 1-5 years (2014-2019)

Phase 2: 6-11 years (2019-2024)

Phase 3: 12-13 years (2024-2026)

The site specific allocations identified in phase 1 include all the committed sites which currently have planning permission and the developer/agent have confirmed that the site will be delivered within this phase and site specific sites which are considered by the Council to be the most suitable and deliverable. Phase 1 also includes a 5% buffer to provide flexibility in the delivery of the requirement.

This monitoring indicator will ensure that the Council has a continuous supply of housing land that can be delivered within a five year period. The indicator will be monitored annually

through the Monitoring Report by using the annual housing completion and the Strategic Housing Land Availability Assessment annual update which forms part of the evidence base.

**Indicators: Number of net additional dwellings per annum by settlement hierarchy/
Number of dwellings completed per site**

These indicators enable the Council to monitor the number of dwellings completed within each of the settlements in North Lincolnshire. The housing completions database records each dwelling completed per financial year. Each record includes the following data on each dwelling:

- Site address
- Greenfield/ Brownfield
- Type of dwelling
- Bedroom size
- Affordable Housing
- Allocation/ non Allocation
- Flood risk zone

This indicator will also enable the Council to monitor if the housing contingency sites need to come forward to support the delivery of the North Lincolnshire housing requirement. Policy CS7 (Core Strategy) states that to provide flexibility in the delivery of housing the Council will allocate contingency sites through the HELADPD to deliver 1,300 additional dwellings within the Scunthorpe Urban Area. The contingency sites will be brought forward if; over any continuous three year period the net additional housing requirement varies by more than 20%.

The Core Strategy identifies a requirement of 12,063 dwellings (at a rate of 754 dwellings per year) to be delivered during the plan period between 2010 and 2026. Adjustments were made to reflect the level of housing that has already been delivered within this period when allocating housing sites in the DPD. Therefore the continuous three year period runs from 2010 as this was the start and remainder of the plan period when the overall housing requirement for North Lincolnshire was set in the Core Strategy.

Housing completions as of 2010 in North Lincolnshire were:-

2010/11 = 457 dwellings completed
 2011/12 = 399 dwellings completed
 2012/13 = 326 dwellings completed
 2013/14 = 379 dwellings completed

Due to under delivery over previous years because of the slow housing market and recession and the Lincolnshire Lakes housing delivery projected beyond 2026 contingency sites had to be brought forward within the plan period to cover the shortfall. These sites are SCUH-C2 Brumby Resource Centre, SCUH-C5 Hebden Road and SCUH-C7 Land at the former South Leys School. The principal focus and first priority for housing is previously developed land and buildings within the development limits of Scunthorpe. The contingency sites brought forward in Phase 1 were the ones deemed most sustainable and deliverable due to the sites availability now, suitable sites for housing and there being a reasonable prospect that housing will be delivered on the site as projected making the site achievable.

The remaining contingency sites will be brought forward if needed to cover any shortfall. Some of the contingency sites are currently in use for other uses therefore these sites are identified later in the plan period.

Indicators: Annual number of affordable homes delivered within North Lincolnshire

This indicator will enable the Council to monitor the percentage of affordable housing being delivered on each of the housing allocations.

Proposed Employment Allocations – quantum of Employment Land requirements and type of requirements; take-up of previous allocations; spatial approach; strategic approach to the allocation at South Humber Bank; transportation infrastructure requirements

The quality and quantity of employment land required in North Lincolnshire is set out in the Employment Land Review 2014 (ELR) (Schedule of Documents Ref: - ECO03 HE09) and policy CS11 of the Adopted Core Strategy. The ELR examines the previous take up of employment land and identifies existing and potential sites that are suitable, subject to allocation, for employment uses. Strategic employment sites have been identified through both the ELR and Policy CS11 of the Adopted Core Strategy, with the latter being tested at public examination. The approach adopted, in terms of identifying strategic employment sites in a number of key locations, namely the South Humber Bank, Scunthorpe, Humberside Airport and Sandtoft Airfield across North Lincolnshire, was supported and effectively endorsed by the Inspector at the Core Strategy's examination. Other key non strategic employment locations at South Killingholme Airfield, Brigg, Barton upon Humber, New Holland and Ealand have been identified within the Housing and Employment land Allocations DPD.

As part of the ELR the Regional Econometric Model is used as the key data source for looking at projected changes to the economy and particularly the employment structure over time. The model uses inputs from historical employment trends, economic output and productivity, population estimates and forecasts and other labour market information to produce historically based forecasts and datasets for 20 industrial sectors covering the period from 2000 to 2020. The ELR highlighted the importance of the South Humber Gateway and its potential to attract major wind turbine manufacturers and the supply chain.

Through the Adopted Core Strategy's spatial strategy the Council seeks to transform North Lincolnshire by ensuring that sufficient employment land is available across the area that both serve local needs and take advantage of the anticipated economic growth generated by the South Humber Gateway with particular regard to the Able UK proposals, namely the Able Marine Energy Park (AMEP) and the Able Logistics Park (ALP) - see next paragraph for details. It is anticipated the Able UK developments will have a huge impact on the service and supply industries across the sub-region and North Lincolnshire with a current unquantifiable amount of employment land required.

AMEP, designed following extensive liaison with the offshore wind industry, will offer 1,289m of new heavy duty deep water quays and 366.7 hectares (906 acres) of developable land. It is designed specifically for the marine renewables sector providing a multi-user facility for the manufacture, storage, assembly and deployment of next generation offshore wind turbines and their associated supply chains. It is comprised of approximately 75,000 sq m of gross floorspace over some 11 buildings with the remaining open site area to be used for infrastructure, storage and assembly uses. 500 constructional jobs are expected to be created, plus the potential to create up to a total of 4,100 jobs. The £450m AMEP project is

seen as vital to the plans for growing the Humber as the UK's Energy Estuary. A Development Consent Order for AMEP was granted by the Secretary of State for Transport in December last year. The AMEP application was subject to consideration by a joint committee of the House of Lords and House of Commons following petitions lodged by Associated British Ports and on the 22nd October 2014, after hearing the petitioner's case the joint committee decided that the applicant did not have a case to answer.

ALP offers a 497.5ha (1,229.5 acres) site with full planning permission in place for the creation of extensive warehousing (1,700,000m²), external storage and transportation depots. 300 constructional jobs are expected to be created with an estimated total of 25,000 jobs between the AMEP and ALP.

The South Humber Bank's development has been promoted and supported since the 1950's through a number of planning documents the most recent of which being the North Lincolnshire Local Plan, Core Strategy and this DPD.

North Lincolnshire's economy is in the midst of a period of transformational change and investment. The two Able UK proposals, highlighted above, and the recent consented Lucent planning applications for 3,000 dwellings and associated infrastructure that cover a substantial part of the Lincolnshire Lakes development area are seen as catalysts for further economic growth and demand for employment land, far beyond previous employment land growth expectations and past employment land take up. This transformational approach that included the potential of over allocating employment land on the basis of expected major developments was central to discussions at the Core Strategy examination and forms the basis for Core Strategy Policy CS11.

North Lincolnshire's economic development is supported through both regional and sub-regional initiatives and forms part of the Humber Sub-Region, which is one element of the wider Yorkshire region and forms part of two Local Enterprise Partnerships, The Humber and the Greater Lincolnshire.

The Growth Plan for the Humber Sub-Region is to mainly focus on realising the potential of the Humber Estuary. Described in the Strategic Economic Plan (SEP) as 'a unique natural asset', the Estuary is already home to the UK's largest ports complex and has several major competitive advantages for offshore wind that have led to strong interest from potential investors in the sector. Developing an energy super cluster centered on offshore wind, but also including the Humber's existing generating capacity and emerging strengths in biomass, biofuels, energy from waste and tidal stream power, formed a major part of the Plan.

North Lincolnshire economic contribution is seen as key in delivering a significant element of the Humber LEP's SEP. Able UK's proposed developments and other local investments in the energy generation sector will significantly contribute to the LEP's goals and objectives resulting in North Lincolnshire's position being viable and enviable in terms of delivering economic growth.

The Greater Lincolnshire LEP has submitted ambitious plan to increase the value of the local economy by £3.2 billion by 2023. The Greater Lincolnshire LEP's Strategic Economic Plan, also called the Growth Plan, is a business investment programme across Lincolnshire, North Lincolnshire and North East Lincolnshire which aims to help create 13,000 new jobs, support the building of 100,000 new homes and help 22,000 businesses grow.

The A160/A180 scheme is currently going through the National Infrastructure Directorate (NID) process for Nationally Significant Infrastructure Projects. The examination is ongoing.

It is expected that construction should begin in April 2015 and take approximately 18 months.

Employment Monitoring – focusing on paragraphs 4.163-4.166 of the Submission DPD, and the evidence base documents underpinning that data, and the Monitoring Framework at Appendix 1 of the Submission DPD

The Monitoring Framework for the DPD is contained within Appendix 1. Core Strategy CS11: Provision and Distribution of Employment Land sets out the strategic employment land requirements across North Lincolnshire with specific indicators established that look at the annual amount of employment land by type and the annual amount of floorspace developed for employment by type. Indicators have been established that look at the annual amount of employment land developed by type within Scunthorpe, Humberside Airport, Sandtoft Business Park, the Market Towns and within the rest of North Lincolnshire. Specific targets, in terms of delivering employment land up to 2026 have been established and reflect the land requirements set by Core Strategy policy CS11.

The take of employment land will be monitored annually through interrogation of the Council's planning application database, employment land completions database and completion of the Employment Land Review (ELR). Use of the Inward Investment enquiries database will be used specifically for the South Humber Bank.

The most up to date assessment of employment land in North Lincolnshire is the ELR Update 2014 (Schedule of Documents Ref: - ECO03 HE09). The ELR provides an employment land assessment for use by North Lincolnshire Council in developing the Local Development Framework (LDF) and informing long term employment land provision in the area. It is a key component of the LDF's evidence base and performs four main functions, which are to: assess the suitability of sites for employment development; look to safeguard the best sites in the face of competition from other higher value uses; identify those that are no longer suitable for employment development that should be made available for other uses; and enable the Council to identify an up to date and balanced portfolio of employment sites in the LDF. Therefore it provides the evidence base to ensure that only sites that are demonstrated to be deliverable are proposed for allocation in the DPD. It also looks at the take up of employment land over the last ten years or so. Please refer to the extracted ELR table below: -

Table 8.7: Total annual take up of employment land (ha)

Use Class	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	Total
B1	0.31	1.78	0.12	0.31	0.08	0.05	0.08	2.73
B1 b and c, B2	0.60	20.94	5.08	0.60	0.21	0.05	0.34	27.82
B8	0.25	4.61	0.48	3.65	0.38	2.34	1.41	13.12
Mixed use	0.00	0.00	0.00	0.00	0.36	0.00	0.00	0.36

B2/B8								
Total	1.16	27.33	5.68	4.56	1.03	2.44	1.83	44.03

Source: Employment land completions between 01/04/04 and 31/03/11, Building Control, North Lincolnshire Council

Table 8.7 indicates that the recent take up of employment land over the last 10 years has been moderate over the time period. It is noted that the current economic recession has had a recent impact on the development and deliverability of employment land in North Lincolnshire but this is only reflective of similar local authorities in the sub-region. The ELR by means of the Regional Econometric Model looks at outputs relating to full time equivalent jobs and employment growth forecasts which are translated into employment land projections for B1 (office and light industrial), B2 (general industry) and B8 (storage and distribution) uses.

The Council strongly contends that the use of previous take up rates of employment land to allocate future land requirements for North Lincolnshire does not take into account the transformational impact that developments on the South Humber Bank, namely the ALP and the AMEP will have on future employment land supply. North Lincolnshire's economy is set to be totally transformed by Able UK's developments on the South Humber Gateway resulting in a massive impact and resultant requirement on supporting local manufacturers and suppliers. The Council does not wish to stifle this anticipated economic growth by being tied to employment land allocations based on trend based take up figures that do not reflect the current fluid economic growth situation for North Lincolnshire that is extremely difficult to traditionally quantify.

As part of the ELR the Regional Econometric Model is used as the key data source for looking at projected changes to the economy and particularly the employment structure over time. The model uses inputs from historical employment trends, economic output and productivity, population estimates and forecasts and other labour market information to produce historically based forecasts and datasets for 20 industrial sectors covering the period from 2000 to 2020. The ELR highlighted the importance of the South Humber Gateway and its potential to attract major wind turbine manufacturers and the supply chain.

Gypsies and Travellers – the Council's approach to providing for the needs of Gypsies and Travellers in the District

North Lincolnshire Council previously intended to bring forward the allocation of sites for Gypsies, Travellers and Travelling Showpeople through the Housing and Employment Land Allocations Development Plan Document (HELADPD) and consulted on sites on a number of occasions, including the Additional Sites Paper in 2008 (BAC07). However at the Examination in Public for the LDF Core Strategy in January 2011, the formal process for the allocation of sites was discussed in detail and the outcome was that due to changes in national planning guidance on the subject that were occurring at that time, sites for Gypsies and Travellers should be allocated through the emerging General Policies Development Plan Document. This was then confirmed in the Inspectors Report.

At the Full Council meeting of 28 June 2011, North Lincolnshire Council adopted the Core Strategy as part of the LDF. The Core Strategy includes a criteria based policy CS10 Gypsies, Travellers and Travelling Showpeople that will be used to assess any future planning applications for a Gypsy and Traveller site. The Inspector at the Core Strategy examination requested that the policy and ancillary text be amended to reflect that sites for Gypsy and Travellers may be allocated through the General Policies DPD and that this be

demonstrated through an up to date needs assessment. The Council have an up to date needs assessment and will be considering allocating sites through the General Policies DPD for Gypsies and Travellers. This is identified in the Local Development Scheme timetable to start April 2015.

Policy PS1 (Presumption in favour of Sustainable Development) – conformity with paragraphs 11-16 of the National Planning Policy Framework)

The discussion will consider Policy PS1 in relation to the National Planning Policy Framework and the presumption in favour of sustainable development (NLC/Paul Tattersfield)

The National Planning Policy Framework states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

This plan is based upon and reflects the presumption in favor of sustainable development, with clear policies that will guide how the presumption should be applied locally in line with requirements of Para 11 in the NPPF.

The Council consider Policy PS1 addresses the requirements of the NPPF. Policy PS1 states how the DPD will address the NPPF requirements. Policies for each of the proposed sites state a number of requirements so any planning application would be assessed against these.