

NEW LOCAL
PLAN



castlepoint

benfleet | canvey | hadleigh | thundersley

New Local Plan Consultation Statement

August 2016

Contents

1. Introduction	3-4
2. Overview of Public Consultation Undertaken	5
3. Draft New Local Plan: Issues Consultation 2012	6-8
4. Draft New Local Plan Consultation 2014	9-12
5. New Local Plan 2016 Consultation	13-14
6. Key Issues from Consultations	15-19
7. Conclusions	20

1. Introduction

This Consultation Report has been prepared by Castle Point Borough Council as part of the Council's New Local Plan submission documentation. In accordance with the requirements set out in Regulation 22(1) (c), (d), and (e) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's adopted Statement of Community Involvement, this report sets out how the Council has involved the local community, stakeholders, and statutory bodies in the formulation of the New Local Plan.

The report therefore outlines the following details for each of the relevant public consultations that have taken place between 2012 and 2016:

- Title of the consultation and the consultation period,
- Key aspects of the consultation and where appropriate main changes arising from any previous consultation;
- The number of representations made and a summary of the main issues raised by the representations made; and
- How any representations made have been taken into account in the plan preparation process

Copies of representations made in accordance with Regulation 20 through the New Local Plan Pre-Submission Consultation, and supporting documentation relevant to the preparation of the New Local Plan are published in a separate Schedule of Representations.

A separate Duty to Co-operate Report has also been produced to demonstrate how the Council has fulfilled its Duty to Co-operate as set out under Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The production of the New Local Plan has been informed by, and subject to, the following assessments, in accordance with the relevant regulations.

- New Local Plan 2016 Sustainability Assessment and Strategic Environmental Assessment
- Habitat Regulation Assessment of the New Local Plan 2016
- Equality Impact Assessment of the New Local Plan 2016

Relevant documentation has been published for public consultation and is submitted alongside the New Local Plan as part of the Council's evidence base.

The Council has established a clear mechanism to engage constructively with relevant landowners, developers, infrastructure providers and other stakeholders through the process of preparing and implementing and delivering the New Local Plan, as required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and as set out in the Council's Statement of Community Involvement.

2. Overview of Public Consultation Undertaken

Since the Council withdrew its Core Strategy in 2011, the planning legislation and regulations have been amended and new requirements introduced by the Government through the Localism Act 2011, the Town and Country Planning Regulation 2012, the National Planning Policy Framework (NPPF), as well as the revocation of the East of England Plan. In light of these changes, in 2011 the Council agreed to produce a New Local Plan in full consultation with local residents and other stakeholders.

Subsequently, three consultations have taken place regarding the New Local Plan as follows:

- Draft New Local Plan: Issues Consultation (January to March 2012)
- Draft New Local Plan: Full Consultation (January to March 2014)
- New Local Plan 2016: Publication Stage (May to June 2016)

3. Draft New Local Plan: Issues Consultation (January to March 2012)

Relevant documents:

Policy:

Draft New Local Plan: Issues and Options Report
Discussion Paper for Statutory and Non-Statutory Consultees
Sustainability Appraisal and Strategic Environmental Assessment
Habitat Regulations Task 1 Report
Equality Impact Assessment Scoping Report

Evidence:

Greater Essex Demographic Forecasts Phase 3 Report (July 2012)
Castle Point Open Space Appraisal Update (September 2012)
Castle Point Playing Pitch Assessment (May 2012)
Castle Point Empty Homes Report (September 2012)
Cabinet Report: New Local Plan Update (18th April 2012)

Background:

The Council decided to withdraw the Core Strategy and commence work on a New Local Plan in 2011 in full consultation with local people and other stakeholders. As a result a revised Local Development Scheme, setting out the programme for preparing a New Local Plan, was prepared and approved in 2012.

As set out in the Local Development Scheme, there were elements of the Council's evidence base that required updating. As a result, Nathaniel Lichfield and Partners were appointed to carry out an Employment Land Review and Retail Needs Assessment for Castle Point. Work commenced in April 2012, and was concluded by August 2012, allowing the Council to use this information in the development of the policies in the Draft New Local Plan.

During this time additional work was also carried out on the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA was aligned with the Annual Monitoring Report (AMR), and was also used for informing the Draft New Local Plan.

Key Aspects

In accordance with the timetable set out in the Local Development Scheme, the New Local Plan Issues Consultation took place from the 25th January until

the 28th March 2012 and followed the requirements of Regulation 25 of the Town and Country Planning Regulations 2004, as amended.

As required by National Policy, a number of technical reports were also consulted on. These documents were:

- Sustainability Appraisal and Strategic Environmental Assessment Scoping Report
- Habitat Regulation Assessment Task 1 Report
- Equality Impact Assessment Scoping Report

Summary:

In total 39,912 information packages and questionnaires were sent out within the Borough (this includes both residents and business addresses). 3,790 questionnaires were returned as a result of the consultation- a 9.72% response rate.

During the consultation period, 692 people attended events organised by the Council which were advertised within the leaflet sent out to all residents and local businesses.

The consultation consisted of four open ended questions which focused on identifying the Council's strengths, weaknesses, opportunities and threats - please refer to the 2012 Consultation Report for a complete analysis.

Table 1: Top three responses from residents and businesses

Question Asked	Category	Rank	Response
What is good about where you live / operate your business in Castle Point?	Strength	1	Green / Open Space
		2	Shops – access
		3	Bus Service
What needs improving where you live / operate your business in Castle Point?	Weakness	1	Road and pavement maintenance
		2	Traffic / Congestion
		3	Town Centre / Shops
Imaging the future, what issues do you think might affect your quality of life or business success?	Threats	1	Development causing congestion
		2	Development causing over development / over population
		3	Traffic / Congestion
What services and infrastructure are needed to make Castle Point better for residents and businesses?	Opportunities	1	Improve road network
		2	Third road on / off Canvey Island
		3	Improve public transport

A Discussion Paper was also made available to Statutory and Non-Statutory consultees which prompted 40 responses. Overall these consultees supported the issues and opportunities identified in the discussion paper.

A limited number of technical responses from the specialist organisations were received in respects to the assessment documents listed above.

4. Draft New Local Plan Consultation (January to March 2014)

Relevant documents

Policy:

Draft New Local Plan 2014
Draft New Local Plan Consultation Report
Preliminary Draft Community Infrastructure Levy Charging Schedule
Draft Review Developers Contribution Guidance SPD
Draft Reviewed Statement of Community Involvement

Evidence:

Castle Point Local Wildlife Site Review and Habitat Assessment
Castle Point Community Infrastructure Needs Assessment Working Draft
Thames Gateway South Essex Strategic Housing Market Assessment
Transport Evidence for the New Local Plan
Castle Point Employment and Retail Needs Assessment
Housing Growth Topic Paper
Greater Essex Demographic Forecast Phase 4
Whole Plan Viability Phase 1 Report
Flood Risk Sequential and Exception Test Report for Housing Site Options
Green Belt Boundary Review
Sustainability Appraisal of Sites Review
Housing Sites Option Topic Paper
Housing Capacity Topic Paper
Local List of Non-Designated Historic Asset Review
Urban Characterisation Assessment
Report on Residential Use of Caravan and Park Home Sites
Sequential and Exceptions Test
Thames Estuary (TE) 2100 Plan
South Essex Strategic Flood Risk Assessment (SFRA)
South Essex Surface Water Management Plan

Background

After the Issues Consultation closed in March 2012, considerable work was undertaken on preparing a robust evidence base for the Draft New Local Plan. A total of 15 new studies were conducted.

In August 2013, the Government published its National Planning Practice Guidance (NPPG) in beta (draft) format. These changes to national policy were then taken into account with the development of the Draft New Local Plan.

The Draft New Local Plan affords the greatest protection to European and national designated sites as required by the NPPF.

The Council adopted a Developer Contributions Guidance SPD in 2009. However, significant policy and legislative changes resulted in the Guidance being updated and a draft Community Infrastructure Levy (CIL) Charging Schedule being prepared and issued for consultation alongside the Draft New Local Plan.

The revised Developer Contributions Guidance included guidance on the nature of Section 106 (S106) Agreements which would be sought once the CIL took effect, focusing on affordable housing provision, the provision of on-site open space, wildlife management, landscaping and public realm works, drainage and flood risk management works, public art, CCTV, litter and recycling bins and employment.

The Council adopted its Statement of Community Involvement in 2006. However, given changes to legislation the Statement was updated, prepared and issued for consultation alongside the Draft New Local Plan.

Finally, the Local Development Scheme was also revised, as significant work had been undertaken to ensure the Draft New Local Plan was in accordance with new national policy; this required a new timetable to be set.

Key Aspects

The additional work undertaken was to ensure the Draft New Local Plan was in accordance with the most up to date planning policy and guidance, including the requirements of the Duty to Co-operate.

In addition to the Draft New Local Plan, the Council also consulted on the CIL Preliminary Draft Charging Schedule, the Draft Revised Developer Contributions Guidance, and the Revised Statement of Community Involvement.

The consultation took place from the 24th January until the 28th March 2014, and included

- The Draft New Local Plan
- The Draft New Local Plan Sustainability Appraisal (Policies)
- Sustainability Appraisal of Sites
- The Draft New Local Plan Habitat Regulations Assessment
- The Draft New Local Plan Equality Impact Assessment
- The Draft New Local Plan Whole Plan Viability Assessment
- Draft Revised Developer Contributions Guidance
- Preliminary Draft Charging Schedule
- The entire evidence base

Summary

Questionnaires were sent to 39,477 residents and business addresses. 4,868 responses were received, resulting in a response rate of 12.33%.

The questionnaire consisted of 11 questions focused on seeking opinion on whether or not a Local Plan was needed, and issues concerning the housing requirements, job growth targets, open space provisions, transport requirements, Green Belt, and historical natural landscapes.

The results indicated that the majority of respondents felt a Local Plan was needed. However, respondents were concerned with the housing requirements (stating they were too high), and indicated a firm priority of protecting the Green Belt and increasing open space provisions.

Statutory, Non-Statutory, Local Authorities, and developers and landowners responded to the consultation with more detailed technical responses.

Overall there was a general support for the additional documents supporting the Draft New Local Plan, with comments suggesting minor changes.

The Council formed a Task and Finish Group to discuss the representations received to the Draft New Local Plan, so that a recommendation could be brought to the Council on how to proceed with the Plan

The Task & Finish Group met on 15 occasions to consider not only representations and suggested responses to the Draft New Local Plan, but also other relevant planning policy and background evidence matters.

The findings of the Task & Finish Group were;

With the exception of Chapter 13 (Housing), the Task & Finish Group has considered the representations and has accepted the responses set out in the Report of Consultation Responses in respect of Chapters 3 to 21 of the Plan.

The Task & Finish Group recommended to Council;

Having considered all the information referred to in this report, the Task & Finish Group was unable to reach agreement in relation to the release of Green Belt Sites and other constraints, the Task & Finish Group refers the Draft New Local Plan to Council for decision.

The Council considered the Local Plan at its meetings on 27th January 2016 and again on 23rd March 2016, when it agreed to ...*alter the draft Local Plan to prioritise protecting Green Belt over meeting our objectively assessed housing needs and remove all virgin green belt sites listed without current planning permission (and including certain specific sites listed in the Castle Point SHLAA 2014) and investigate other constraints (including drainage ,transport infrastructure, flood risk and hazardous sites).*

It further resolved to.....*approve the publication of the Castle Point New Local Plan 2016 for further consultation and then submission to the Secretary of State.*

5. New Local Plan 2016: Publication Stage (May to June 2016)

Relevant documents:

Policy:

New Local Plan 2016

New Local Plan 2016 Sustainability Assessment and Strategic Environmental Assessment

Habitat Regulation Assessment of the New Local Plan 2016

Equality Impact Assessment of the New Local Plan 2016

Evidence:

(As for the Draft New Local Plan 2014, but with the following updated evidence)

Greater Essex Demographic Forecasts Phases 5, 6 and 7

Canvey Island IUD Model

Canvey Island Six Point Plan

South Essex Strategic Housing Market Assessment 2016

Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

Castle Point Strategic Housing Land Availability Assessment Update October 2014

Castle Point Strategic Housing Land Availability Assessment Update November 2015

Transport Evidence for the New Local Plan Phase 2

Annual Monitoring Reports 2013/4 and 2014/5

Hometrack Quarterly Reports

Background

As a result of the decision of the Council, the Draft New Plan was amended as instructed - with particular reference to the deletion of sites referred to by Council in the SHLAA 2014.

The New Local Plan was then published for consultation purposes prior to its eventual submission to the Secretary of State. The New Local Plan 2016 was also accompanied by important supporting documents as listed above, which were also amended to reflect the Council's decision.

Further background evidence had also been received during the deliberations on the Draft New Local Plan. Where possible and relevant the New Local Plan 2016 was updated to reflect this evidence.

Key Aspects

The consultation on the New Local Plan took place from the 16th May 2016 until the 30th June 2016. It was based around the following documents;

- The New Local Plan 2016
- New Local Plan 2016 Sustainability Assessment and Strategic Environmental Assessment
- Habitat Regulations Assessment of the New Local Plan 2016
- Equality Impact Assessment of the New Local Plan 2016
- The evidence base

Summary

Representation forms were sent to 40,056 residential and business addresses in Castle Point.

A total of 1,523 representations were made. A separate Schedule of Representations has been prepared which contains details of all responses.

In summary principal consultees such as neighbouring and nearby local planning authorities comment on the following matters:

- Proposed housing target and allocations do not meet Objectively Assessed Needs (OAN)
- Proposed safeguarded Green Belt inappropriate if needs cannot be met
- Adverse transport implications of development at north-west Thundersley
- Insufficient regard for Gypsy & Traveller provision
- No evidence to justify a new link road from Canvey to Coryton

Other interested bodies and organisations remarked on particular policies or proposals and if appropriate with suggestions as to how these may be modified to accommodate particular points.

6. Key issues from consultations

The main issues raised during consultation on all phases of the preparation of the New Local Plan are summarised below.

Key Issue 1: Objectively Assessed Need for Housing vs. Capacity

Neighbouring authorities and developers have highlighted the significant difference between the housing target in the New Local Plan and the objectively assessed needs for housing identified in the Strategic Housing Market Assessments and the Housing Growth Topic Paper. There is an expectation amongst neighbours that the Council should look in more detail at the available sites to ensure that they are deliverable and that their capacity is maximised. There is meanwhile an expectation amongst developers of a higher housing target than is set out in the plan.

In response to these comments, the Council has reviewed its Strategic Housing Land Availability Assessment which shows that all reasonable sites have been identified and that their capacity to accommodate housing is fully assessed. Many Green Belt sites have been identified to the Council, by land owners and/or developers but local resident representations are strongly opposed to the development of Green Belt sites. While the ability of these sites to contribute towards housing supply has been assessed within the Land Availability Assessment, the Council is clear that it is not realistic to expect housing development within the Borough to meet objectively assessed needs, without causing harm to planning interests of acknowledged international, national and local significance, including the permanent loss of open Green Belt land.

Key Issue 2: Objectively Assessed Need for Housing and the Duty to Co-operate

Because the New Local Plan will not be able to deliver sufficient housing land to meet the Borough's objectively assessed housing need, neighbouring authorities and developers have indicated the need for the Council to engage with neighbouring areas through the Duty to Co-operate in order to seek to determine how unmet need can be addressed.

Work is already underway on this issue. A separate report on this matter has been prepared describing the Council's active participation in continuous and effective engagement on strategic planning matters across South Essex. However because of the different time scales to which each local planning authority are working in the preparation of their local plans, it is not yet possible to demonstrate a final agreed position on any strategic planning policy in the area, including housing distribution. Nonetheless it is not considered that this represents a robust reason to delay the submission of the Castle Point New Local Plan given the Government's exhortation to make progress on local plans, as the Council will continue to work with its

neighbours, and to review any policy in the light of any subsequent Duty to Co-operate framework or agreement.

Key Issue 3: Site H11– North West Thundersley

Essex County Council as Highway Authority has raised an objection to the inclusion of site H11 in the New Local Plan. It has highlighted evidence which indicates that this site is not sustainably located in order to access services such as school and GP provision. It has also raised an objection in relation to highways access. It has highlighted evidence in the Transport Assessment which describes the A127 and A130 (potential points of access to the site) as key routes within the strategic highway network that are already highly utilised. It also highlighted evidence in the Whole Plan Viability Assessment which indicated that development in this location is not deliverable due to the costs associated with a new junction or junction alterations.

The Council notes these comments and understands the position of the Highway Authority. Nonetheless the Council considers that this area represents a valuable opportunity for new housing development, notwithstanding its Green Belt allocation; it displays the attributes of previously developed land and could therefore be considered as an exception to inappropriate development test as set out in paragraph 89 of the NPPF. Furthermore the Council recognises that there is local support for this proposal. As a consequence the Council has drafted its policy to make clear that development may proceed on the land subject to a number of important prerequisites, the first of which requires appropriate access arrangements to be agreed with funding for delivery of that access identified.

Key Issue 4: Gypsy and Traveller Accommodation

Neighbouring authorities have indicated a concern with regard to the provision made within the New Local Plan for Gypsy and Traveller Sites. In particular, Basildon and Thurrock have indicated that they may experience difficulties in meeting their needs for such accommodation (which in both cases is significant), and seek for Castle Point to accommodate its own growth, and perhaps some additional units. They make it clear that the provision of Gypsy and Traveller Accommodation is a strategic matter that should be considered as part of the Duty to Co-operate.

It should be noted that Gypsies and Travellers are identified as minority ethnic groups. Ethnicity is a protected characteristic under the Equality Act. The Council must therefore consider the specific accommodation needs of Gypsies and Travellers alongside the accommodation needs of other groups, and seek to make appropriate provision through the local plan.

The Essex Wide Gypsy and Traveller Accommodation Needs Assessment indicates a requirement for 5 additional authorised pitches for Gypsy and Traveller Accommodation in Castle Point in the period 2013 to 2033. There are no known sites proposed for the accommodation of Gypsy and Traveller pitches in Castle Point.

Further site identification seeking to establish site allocations for an increased number of pitches would appear to be a disproportionate response, in a Borough with significant environmental constraints, and would also appear to be a disproportionate response not supported by evidence.

The alternative adopted by the Council has been to establish a criteria-based policy which directs Gypsies and Travellers towards suitable land on the edge of the existing urban area of the Borough. The policy contains criteria which limit the number of pitches on any one site, and prevent sites being delivered in close proximity to one another. Landscaping and waste management are also important requirements. This approach is considered to be a positive way of dealing with the Council's own requirements, and potentially also accommodating a small amount of the requirement for Basildon and/or Thurrock.

Key Issue 5: Flood Risk and Surface Water Management

A number of representations have been made which draw attention to the fact that Canvey Island is within a Flood Risk Zone 3A. Furthermore, mention is made of the capacity of the existing drainage network, particularly in the light of recent extraordinary rainfall events which lead to the flooding of nearly 1,000 properties on Canvey Island. There are also surface water drainage issues in parts of Benfleet Hadleigh & Thundersley which had also lead to localised and serious flooding to properties. It is suggested that these constraints should lead to a moratorium on new development.

In terms of tidal flood risk, Canvey Island is protected by substantial sea defences which are maintained by the Environment Agency and are effective in managing tidal flood risk. Furthermore the Thames Estuary 2100 Plan commit the Agency to further action to maintain these defences in the light of climate change and new development. The New Local Plan draws on this evidence. A large well-established community such as Canvey Island should not be prevented from carrying out any development – that is an unsustainable approach, which fails to take into account the ongoing needs of that community. Accordingly the plan makes provision for new development to meet those needs, and for land to be reserved for improvements to defences in the lifetime of the plan.

The Environment Agency has raised no objections to the plan.

In terms of surface water management there is clear evidence in the South Essex Surface Water Management Plan of areas susceptible to surface water flooding. These locations are identified as Critical Drainage Areas and an appropriate suite of policy requirements for new development are set out in policy CC6.

In terms of existing development the Council has been an active partner in a multi agency flooding task force assembled to investigate the causes of recent flood events and bring forward solutions. Significant work has been undertaken to improve

the capacity of existing infrastructure, and a Six Point Plan has been drafted to direct bidding for resources to carry out more substantial improvements.

Essex County Council as Lead Local Flood Authority has welcomed and supports the policies in the plan in broad terms.

Key Issue 6: The Employment Target set out in Policy E1: Economic Strategy

A neighbouring council queried the employment target within the New Local Plan, relative to the housing target. Modelling has shown considerable consistency in its economic forecasting for Castle Point in the period to 2031, indicating growth of the order of 2,100 – 3,500 jobs.

A review of the capacity of Castle Point to accommodate employment growth indicates that there is sufficient land designated for employment purposes to provide for 3,000 – 3,500 jobs. The supply of land is sufficient for there to be flexibility in the types of jobs provided i.e. office based, industrial or warehousing. To this end, it is considered that the likely job growth in Castle Point set out in policy of at least 2,100 jobs is realistic.

Furthermore evidence from the Strategic Housing Market Assessment suggests that while local labour supply may decrease, there is likely to be growth in the working age population in South Essex generally.

Key Issue 7: The Extension of Manor Trading Estate

A number of businesses located at the Manor Trading Estate have made representations to the effect that the housing target in the plan is not sufficient and that the land adjacent to the east of the Manor Trading Estate should be allocated for housing rather for employment purposes.

The Employment and Retail Needs Assessment indicated a need for a 4 – 5ha site in the Benfleet area for the provision of employment premises. The only site that is realistic and suitable for such purposes is land to the east of Manor Trading Estate.

Furthermore the respondents identify the fact that the New Local Plan allocates more employment land for the amount of growth required – 19ha compared to a potential requirement for 5.7ha. However, the other sites – 15ha in total are located on Canvey Island and do not therefore respond to the need identified in the Employment and Retail Needs Assessment for a site in the Benfleet area.

The Council has therefore maintained the allocation of land to the east of Manor Trading Estate as an employment land allocation. This is consistent with the evidence of need in the Employment and Retail Needs Assessment.

Key Issue 8: The Oil & Gas Storage Sites Canvey Island

A number of local residents have expressed concern at the risks posed by the location of two upper tier hazards sites in close proximity to existing and proposed residential accommodation on Canvey Island.

In contradiction, the owners of the oil storage facility have expressed disappointment with the negative approach taken to the site expressed in certain policies in the Plan, whilst the Port of London Authority highlighted the strategic importance of these facilities, and their capacity for growth.

The Council has considered the situation regarding these facilities carefully. It is clear that national policy supports the provision of appropriate energy infrastructure, and that these sites have deep channel river access and are connected to the national pipeline network. It is also evident that both sites are carefully controlled by other competent authorities under regulatory regimes other than planning. The Health & Safety Executive has raised no comments or issues concerning the New Local Plan generally or these sites in particular.

The New Local Plan therefore acknowledges the presence of these important energy infrastructure installations on Canvey Island, and recognises their importance; it therefore seeks to express policy in a positive way consistent with the principles of the NPPF.

Key Issue 9: The provision of an additional access to Canvey Island

A number of local residents have expressed concern at the capacity of the highway network in the Borough, and its limited resilience to any form of incident. The problem is accentuated for Canvey Island given the geography as an island and the convergence of both points of access on one junction – the Waterside Farm roundabout.

The transport evidence for the New Local Plan shows that whilst there is capacity at the Waterside Farm junction itself, there are two arms of single carriageway (A130 Canvey Way and B1014 Somnes Avenue) which impede free flow.

The New Local Plan therefore follows a twin track strategy. First it seeks to encourage business development at Canvey Island on allocated employment sites, in order to reduce out-commuting where possible. Secondly it seeks to encourage improvements to these transport corridors through the identification of Transport Improvement Areas in policy T2; it also identifies an opportunity for an additional access from Canvey Island to Coryton and then DP World – consistent with the aspiration in the Chancellor of the Exchequer's announcement in the Budget 2016 of seeking improved access to Canvey Island

7. Conclusions

This report demonstrates that from 2012 to date the Council has followed an open transparent process in the preparation and publication of its New Local Plan 2016.

It has followed legislative requirements as well as good practice. It has also complied with its Statement of Community Involvement.

There has been on-going engagement with local residents and business, resulting in significant changes to policy where that is justified by the available evidence.

There has been active and constructive co-operation with nearby and neighbouring local planning authorities to ensure that cross-boundary strategic planning matters have been fully considered and, where possible and consistent with the Council's strategy and evidence, carried through to the plan.

Interested bodies and organisations have also played a key role in refining appropriate policies to ensure that the New Local Plan represents a positive yet holistic approach to sustainable development.

Land owners and developers have also played an important role in highlighting potential sources of housing supply; where the allocation of such those sites would be consistent with the Council's strategy of promoting brownfield sites whilst protecting open Green Belt land, then these have been carried forward in a positive way.