

Paragraph 48

The Council's *Submission Consultation Statement Regulation 22* appears to summarise most, if not all, of the issues raised. However, Regulation 22 seeks a summary of the main issues. Please can the Council therefore provide a list of what you consider to be the main issues arising from the representations. It would also be helpful if the Council could provide a short summary response to each of the identified main issues.

The following is a list of the responses/main issues raised by the Regulation 19 consultation. This is organised by Local Plan Chapter including comments on key evidence where relevant. Exceptionally the Council has identified potential modifications to the proposed submission plan and where justified this is explained within the table (a separate schedule of proposed modifications as been prepared and submitted to the examination (LP03)).

Main Issues raised in Plan order including the Council response/ action

Issue Ref	Plan Topic/ Chapter	Policy	Main Issues Raised	Council Response	Potential to change Plan arising from the issue
1	Consultation	Whole Plan	<p>The Plan is not legally compliant because there has been a failure to communicate with residents, a failure to be open and transparent in its process and publication of evidence, and a failure to consider the views of the residents.</p> <p>The method of seeking responses online is unfair and confusing and does not provide sufficient range of choices.</p>	The council has set out the consultation undertaken and how it has informed preparation of the Plan within its Regulation 22 Consultation Statement. Available evidence has been made available via the council's website. All comments have been reviewed and responded to at each stage with consultation undertaken over three core documents (Issues and Options, Preferred Options, Alternative Sites) plus specific engagement on Local Green Space designations.	None suggested.
2	Duty to Cooperate	Whole Plan	The Duty to Cooperate has not been complied with. It is unclear on what basis the council has engaged with its neighbouring local authorities and prescribed bodies during the preparation of the Plan.	The council has engaged in an ongoing basis with all neighbouring authorities and prescribed authorities. The Statement of Common Ground (PD08) and the Consultation Statement (PD03) outline the engagement that has been undertaken.	None suggested.
3	Sustainability Appraisal		Concerns about the soundness of the sustainability assessment made in relation to the selection of sites identified for allocation. There is an absence of a distribution of development	The Plan preparation and SA processes have considered and assessed reasonable alternatives to the spatial strategy and proposed housing allocations. It is considered the approach to SA and	None suggested.

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			through the policies of the Plan which makes it impossible to assess what role a site plays in meeting housing needs and whether it is necessary to meet outstanding residual housing need, or whether more growth is needed.	its findings are sound.	
4	Whole Plan		The Plan period should be revised to cover a longer period.	The council has identified that it is prepared to extend the plan period by a year to 2036 to ensure a 15 year period from likely adoption. See the council's response to the Inspectors Initial Questions, Paragraph 4 for further details.	Amend plan period to 2036.
5	Vision and Spatial Development Strategy	Policy S 1: Sustainable Development Principles	The policy should be amended to more closely align with national policy to support all housing delivery, not just affordable and to clearly state the purpose is to significantly boosting housing delivery.	Policy S 1 as drafted sets a positive framework upon which the remaining policies of the plan are built and it is considered to be clear all development to meet identified needs is supports. The council does not consider there to be any requirement to repeat wording from NPPF within the policy.	None suggested.
6		Policy S 2: Strategic Priorities and Requirements	The number of homes identified as being required is identified as both insufficient to meet the needs of the district and too high.	The council considers that identified housing needs are robustly justified through the available evidence. See the council's response to the Inspectors' Initial Questions Paragraphs 6 to 10 for further details.	None suggested.
7		Policy S 3: Spatial Distribution	Objections to the settlement hierarchy, namely that Northallerton, as the main town, should be held higher than other market towns. Too much development focused on Thirsk, Northallerton, Dalton and Leeming Bar to the detriment of the needs in the other market towns and service villages. Some small sites should be allocated to allow for choice and variety. Topcliffe and Dalton should have housing	The Settlement Hierarchy reflects the characteristics of Hambleton, where Northallerton is the largest town the importance of the remaining market towns is of equal significance for their surrounding communities. The delivery of growth across each of the towns and policy S3 directs growth particularly to Northallerton and Thirsk. The council considers the overall range and choice of sites identified will support delivery and boost the sustainability of	None suggested.

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			<p>allocations given their large employment allocations. Great Broughton should be lower in the Settlement Hierarchy.</p>	<p>communities across the district. The specific settlements of Topcliffe and Dalton were both considered as technically capable of providing for some housing delivery through the spatial strategy but no suitable sites have been identified. Suitable development at these locations may still come forward during the Plan period through the exceptions and windfall policy.</p>	
8		Policy S 4: Neighbourhood Planning	<p>The council has not given any housing requirement through this policy and suggests that the neighbourhood plan groups devise the housing need. The text in Policy S4 should be revised to reflect NPPF paragraphs 65/ 66.</p>	<p>Policy S4 is clear that no delivery is required from Neighbourhood Plan areas to meet the district wide housing requirement, as there is an expected sufficient number of housing delivery from other sources. However, provision is made within the policy for neighbourhood plan groups who wish to propose their own local housing development, which is expected to be of small scale to meet any locally specific needs.</p>	None suggested.
9		Policy S 5: Development in the Countryside	<p>Policy is too restrictive and open to interpretation; it should simply set out the need to recognise the intrinsic beauty, character and distinctiveness of the countryside to reflect the NPPF. Terms within the policy should be better defined to ensure its effectiveness.</p>	<p>The policy does not deviate from the NPPF but applies additional clarification for local implementation. It is necessary for the policy to do this in order to provide the correct level of protection to these sensitive areas of the district. The terminology is considered clear.</p>	None suggested.
10		Policy S5: Development in the Countryside	<p>There is the risk that the development of allocations could be found to conflict with the protection of the best and most versatile agricultural land (Grades 1, 2 and 3a) within this policy.</p>	<p>The suitability of each allocation for development has been considered as part of the preparation of the plan and will be tested through this examination. It is important for windfall schemes that Grade 1, 2 and 3a agricultural land is afforded protection.</p>	None suggested.

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11		Policy S 6: York Green Belt	No main issues arising.	n/a	n/a
12		Policy S 7: The Historic Environment	The policy requires revisions to clarify its application in accordance with NPPF with a range of advice provided by Historic England.	The council has proposed a modification to the policy to respond to changes made to Policy E5 Development Affecting Heritage Assets.	Amendments to wording (M15)
13	Supporting Economic Growth	Whole section	Inadequate policy provision to retain young people in suitable homes and employment in Easingwold.	The council considers the Plan to be justified based on the evidence provided in evidence including the Employment Land Review, 2016 (SD07), the Housing and Economic Development Needs Assessment, 2018 (SD08) and Hambleton Economic Topic Paper, 2020 (SD09).	None suggested.
14		Policy EG 1: Meeting Hambleton's Employment Requirement	Concern raised that the volume of allocated employment land does not accurately reflect future requirements for employment land.	The provision of employment land in the Local Plan is justified based on the evidence provided in evidence including the Employment Land Review, 2016 (SD07), the Housing and Economic Development Needs Assessment, 2018 (SD08) and Hambleton Economic Topic Paper, 2020 (SD09).	None suggested.
15		Policy EG 2: Protection and Enhancement of Employment Land	Insufficient flexibility for alternative uses within key employment locations for uses other than B1, B2 and B8.	The council considers that the Policy does allow for flexibility, whilst also providing clarity to safeguard and enhance identified employment areas across the district. Employment land must be protected for specific purposes due to the economic benefits they deliver and the particular impacts such activities can have upon the amenity of other occupiers if not properly managed.	None suggested.
16		Policy EG 3: Town Centre Retail and	Easingwold town centre should not be excluded as a potential location where housing delivery may be considered appropriate.	This specific requirement for Easingwold town centre came about in response to conclusions within the Retail and Leisure Study (SD13), whilst justified	Amend to delete exception for Easingwold (M19)

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		Leisure Provision		in the council's view due to the nature of the centre the council accept this point and proposed modification.	
17		Policy EG 4: Management of Town Centres	Easingwold Town Council would like to see the Primary Retail Area extended to an area extending over more of the town centre. The reuse of vacant or under used upper floors for residential use ought to be particularly encouraged in all market towns.	Primary Shopping Areas have been defined based on the recommendations of the Hambleton Retail and Leisure Study (October 2016). Proposals that bring upper floors into productive use will be supported to maintain the vitality of all market towns.	None suggested.
18		Policy EG 5: Vibrant Market Towns	The site known as Bedale Car and Coach Park needs an assessment of what contribution this currently undeveloped area makes to the significance of the adjacent listed building and conservation area and what effect the loss of this site and its subsequent development as a car park might have upon the significance of those assets.	An assessment of the Bedale Gateway Car and Coach Park has been undertaken and is provided within the Heritage Background Paper August 2018 Addendum January 2020 (SD24). See council response to the Allocations Chapter.	See council response to the Allocations Chapter.
19		Policy EG 6: Commercial Buildings, Signs and Advertisements	No main issues arising.	n/a	
20		Policy EG 7: Rural Businesses	Policy requires amending to enable the redevelopment of existing sites and there is no reference to climate change and the accessibility of local produce.	Paragraph 4.76 of the Local Plan outlines how the expansion of existing businesses into the countryside may be appropriate. The council propose a modification to address issues of climate change to support opportunities for reducing carbon emissions from agriculture related development.	Amendment proposed (M26)

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21		Policy EG 8: The Visitor Economy	The requirement for tourism accommodation to be located in or adjacent to a settlement or on a sustainable transport route is undeliverable.	Paragraph 4.87 and 4.88 of the Plan sets out how the policy seeks to direct new tourism-related development to the district's market towns and villages, but it recognises that this will not always be possible.	None suggested.
22	Housing Needs		As drafted the start date for the Plan results in an artificial reduction of the overall level of homes needed, which will not meet affordable housing needs or benefit communities.	The start date of the Plan does not reduce the requirement for homes set out through the Local Plan. The Plan identifies a figure for housing delivery that meets the needs established within the Housing and Economic Development Needs Assessment (SD08) and that is substantially above the housing requirement set out through the standard methodology for calculating housing needs.	None suggested.
23	Housing Needs		A policy on phasing should be added.	Information on the anticipated delivery rates of housing sites is set out within the Strategic Housing Land Availability Assessment and will be updated on a regular basis. The council does not consider a phasing policy that imposes artificial limits on the capacity of sites to deliver homes would be a sound approach.	None suggested.
24	Supporting Housing Growth	Identifying local housing needs	The overall level of housing growth proposed in the Plan has been challenged with some landowners, developers and housebuilders seeking an increase in the housing requirement, with residents and other community groups suggesting that fewer homes should be required. There are concerns regarding the flexibility of housing land supply, application of an appropriate buffer and uncertainty regarding assumptions that	The council's approach to identifying housing growth is considered appropriate, justified by a robust assessment of the evidence and particular characteristics driving potential growth in the district. This approach has meant a level of growth is identified that is in excess of that required through the Government's standard methodology. Appropriate evidence regarding this requirement is set out within the Housing and Economic	None suggested.

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			have fed into the calculation of housing needs, notably regarding the level of in-migration.	Development Needs Assessment (SD08), and information on housing delivery is included within Strategic Housing Land Availability Assessment 2019 (SD17) and Housing Assessment Update (SD21).	
25	Supporting Housing Growth	Policy HG 1: Housing Delivery	<p>A substantial proportion of proposed housing supply is at undelivered allocations and one large allocation. The approach to identification of delivery within the next five years does not accord with the definition of "deliverable" within the revised NPPF. Amending forecasts of supply to accord with NPPF 2019 will have significant implications upon the Council's five-year housing land supply position.</p> <p>Additional clarification is sought over existing planning permissions that will be saved, what a "commitment" is, the timeframes for delivering the identified emerging allocations including a trajectory.</p>	<p>All existing LDF allocations proposed to be retained within the Local Plan are the subject of ongoing pre-application discussions with developers or are otherwise well advanced. The council's view is that sufficient evidence exists to demonstrate the deliverability of all new dwellings identified, in accordance with NPPF.</p> <p>Information regarding the proposed timeframes for delivery of development on specific sites is set out within the Housing Assessment Update (SD21). See the council's response to the Inspectors' Initial Questions Paragraphs 29 and 30.</p>	None suggested.
26		Policy HG 2: Delivering the Right Type of Homes	<p>There is failure to address the needs of custom and self-builders, failure to ensure the delivery of 10% wheelchair adaptable dwellings, and no awareness of community led housing, and a failure to justify the requirement for 10% bungalows.</p> <p>The Plan fails to identify and address the range of problems faced by communities in villages. Community led housing, accommodation for keyworkers, and adults and young people on learning programmes or apprenticeships, smaller bungalows and affordable homes should be</p>	<p>Overall, it is important that the Plan supports a range and mix of homes to meet the needs of all residents in Hambleton, and that is viable and capable of delivery in the Plan period. The council considers that HG2 establishes an appropriate commitment to work with applicants and developers to support delivery of custom and self build housing – as established through Policy HG 2: criterion b. Reference to Community led schemes is noted through HG 2: criterion e. The requirement for bungalows is discussed within the Housing Topic Paper (SD20) and highlights the evolution of the</p>	None suggested.

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			prioritised.	requirement throughout plan preparation, which is justified through the identification of a specific need within the Council's 2016 Strategic Housing Market Assessment (SD18 and SD18.1). The council has provided further discussion on its approach to this issue in response to the Inspector's Initial Questions in paragraphs 41 to 45.	
27		Policy HG 2: Delivering the Right Type of Homes	Concern that the Whole Plan Viability Report (June 2019) identifies issues with a number of site typologies.	The Whole Plan Viability Report establishes the overarching viability of proposals and the policy requirements within the Plan. However, it is acknowledged that when considered as a broad typology the viability of some forms of development is challenged. However, this does not mean that specific sites in those typologies will not be capable of being delivered and, where necessary the council, in accordance with NPPF, is prepared to consider with applicants any site specific considerations that should be taken into account to enable delivery. The council has provided further discussion on its approach to this issue in response to the Inspectors' Initial Questions, specifically paragraph 41.	
28		Policy HG 2: Delivering the Right Type of Homes	The policy needs to be flexible in the event of an updated housing needs assessment, and clarity of need in the policy as to whether non-compliance with part f, g, h and i would result in a refusal, the mechanisms to achieve part b, and the requirements for the distribution of housing by type and size. Part a and b of the policy are overly onerous and potentially limit the delivery of homes. The council should clarify that part h of	The Local Plan has been subject to an independent viability assessment taking into consideration all policy costs and undertaken in accordance with Planning Practice Guidance. The operation of the policy establishes through criteria a. to e wider council objectives for supporting the delivery of specific forms of housing over the Plan period and will add weight towards the consideration of schemes that support those	

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			the policy has been fully and comprehensively viability tested.	objectives. Meanwhile, criteria f. to i. are requirements of development that, as with all development plan policy, will be given substantial weight in the consideration of planning applications.	
29		Policy HG 3: Affordable Housing Requirements	<p>The Plan does not address need for affordable housing or the loss of services and facilities in villages. There is concern at the availability and spread of affordable shared purchase homes, smaller homes, bungalows and starter homes, and inflexibility of the prescribed tenure split and contribution. The policy should make reference to Discounted Market Sale (DMS) as an acceptable form of affordable housing and the level of discount identified for the district.</p> <p>Further information is needed regarding the transfer price of affordable housing and this should be set in policy if a requirement of the council.</p> <p>Clarification of part d. to define a "cluster".</p> <p>The evidence base, including viability report is unsound.</p>	<p>Policy HG3 establishes requirements for affordable housing provision in keeping with identified needs and evidence of viability. At 30% of all development, the proposed policy will meet in full the shortfall in identified homes identified by the Housing and Economic Development Needs Assessment 2018 (SD08).</p> <p>The council considers that criterion c. of policy HG3 provides sufficient clarity on its preferred tenure split for affordable housing whilst establishing that mix can be adjusted subject to identified needs. The tenure mix defines intermediate affordable housing and would consider DMS to fall within this form of affordable housing, as affordable home ownership, whilst the policy as a whole sets requirements for affordable housing as defined within National Policy. Equally, in the council's view, establishing a percent discount within policy would not support the flexibility of the policy in response to changing evidence and Government initiatives for housing. The council acknowledges that the policy HG3 requires an additional criterion and has proposed a modification to include this in the Plan.</p> <p>Further clarification of detailed matters such as "clusters" within the policy are not considered appropriate and sufficient text is provided at paragraph 5.49 to assist applicants. Meanwhile, the council has also identified preparation of a Housing</p>	Addition of reference to confirmed transfer price to Policy HG 3. (M33)

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				SPD to provide some further detailed guidance for applicants and decision makers in relation to issues such as transfer prices, clusters and tenure flexibility.	
30		Policy HG 4: Housing Exception Schemes	Entry level exception sites would have the same impacts as a rural exception sites upon settlement character and countryside. The same criteria as criterion f. for rural exception sites should be included for entry level sites.	The approach outlined in relation to entry level exception sites is in accordance with NPPF paragraph 71. National policy requires that such sites should be proportionate in scale to the settlement so this consideration does not need to be repeated within the Plan.	
31		HG 5 Windfall Housing Development	<p>Windfall policy does not provide sufficient clarity on what will be acceptable. Clarification is needed on A; what information is required to confirm deliverability, B; the level of evidence whether existing outstanding commitments will come forward, what level of growth is planned during the plan period, how suitable D is regarding location and scale, and the definition of "minor scale housing development" and "main built form".</p> <p>The policy should be expanded to sites of all sizes, and be more flexible, in line with the NPPF but also received was the consideration that development of ad-hoc housing in villages outside of the settlement hierarchy is poorly controlled and often unsustainable.</p> <p>The policy allowing development adjacent to the built form should apply to all settlements.</p>	The Windfall policy sets out the situations where non-allocated housing sites are acceptable. The Plan as a whole establishes the level and distribution of growth over the plan period whilst further discussion of suitable available evidence of deliverability is provided at Paragraph 5.70, whilst a range of evidence including the 5 Year land supply will inform assessment of committed development in an area. Minor development is a nationally recognised term also defined within the Local Plan Glossary. Larger developments in locations outside the built form of settlements are not considered appropriate except where they conform with HG 4 Housing Exception Schemes.	None suggested.

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32		Policy HG 6: Gypsies, Travellers, and Travelling Showpeople	Concern that the evidence base is unsound as it under-estimates the level of need, the number of unauthorised pitches in the authority, and that vacant pitches indicate movement, not need. Policy HG6 is unsound in that it does not provide sites through fair, realistic and inclusive policies; does not meet its purpose of enabling the provision of pitches to meet the need of gypsy and traveller families within the district.	The council acknowledges that its evidence base regarding Gypsies, Travellers and Travelling Showpeople (GTAA) (SD15) requires update and has prepared an Addendum, March 2020 (SD15.1) addressing the issue. A new assessment has been commissioned and is expected to be completed by the end of July 2020. The council has proposed modifications in submission of this Plan to provide further information on the level of needs. The commitment to update the GTAA is set out in the Housing Topic Paper (SD20). The council has set out further discussion on this issue in response to the Inspectors' Initial Questions Paragraph 39 and 40.	Addition of current need to policy HG 6. (M45)
33	Supporting a High-Quality Environment	Policy E 1: Design	Clearer and effective content within the Plan is required relating to climate change as a result of specific legislation /regulations.	The council considers sustainability and climate change adaptation and mitigation is a key thread running throughout the document but, in response to the comments received recognises scope for more explicit reference to aid clarity and interpretation of the Plan and the role of design in achieving this. Text is proposed to be added to E 1 to integrate consideration of appropriate climate change mitigation measures in the design of development.	Amendment proposed (M47)
34		Policy E 2: Amenity	No main issues arising.	n/a	n/a
35		Policy E 3: The Natural Environment	Policy requiring biodiversity net gain should be clear about how this will be measured.	Natural England recognises the Council aspiration to complete an associated SPD to develop a detailed document on net gain. Natural England have offered support and advice to deliver the forthcoming SPD. Meanwhile DEFRA are in the	Additional text clarifying tools to be used to measure biodiversity net

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				process of finalising guidance for Local Authorities to implement biodiversity net gain. Accordance with the policy will be established with reference to this national and local guidance.	gain (M53)
36		Policy E 4: Green Infrastructure	No main issues arising.	n/a	n/a
37		Policy E 5: Development Affecting Heritage Assets	The policy requires revisions to clarify its application in accordance with NPPF with a range of advice provided by Historic England.	The council has acknowledged the advice provided by Historic England and has considered some modifications to aid interpretation of the policy in the protection and enhancement of designated and non-designated heritage assets. See council response to the Allocations Chapter.	Amendments regards archaeology and less than substantial harm proposed (M57)
38		Policy E 6: Nationally Protected Landscapes	No main issues arising.	n/a	n/a
39		Policy E 7: Hambleton's Landscapes	No main issues arising.	n/a	n/a
40	Infrastructure and Community Services	Policy CI 1: Infrastructure Delivery	Clarification that infrastructure to be provided by this policy will not duplicate that being provided by CIL. A 'Rural proofing' assessment should be undertaken for all developments and the overall plan, to ensure rural communities and their needs are not in any way overlooked.	CI 1 sets out requirements to ensure the specific planning impacts arising from development will be taken into consideration. The role of CIL as part of any infrastructure delivery will form part of this with information regarding CIL funds and expenditure published in accordance with the CIL regulations as amended in 2019. The provision of and support for facilities and	None suggested.

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				services to serve the needs of rural communities, as well as the district's market towns is integral to the approach of the Plan. Specific infrastructure needs in response to expected growth across the district's towns and countryside are explored within the Infrastructure Delivery Plan 2020 (LP07).	
41		Policy CI 2: Transport and Accessibility	No main issues arising.	n/a	n/a
42		Policy CI 3: Open Space, Sport and Recreation	No obvious evidence which sets out the current levels of greenspace provision to judge whether there is a surplus or deficiency and whether the impact of this Policy been tested by the Whole Plan Viability Assessment	The council have undertaken consultation on a Local Greenspace Assessment, 2018 (SD25) a Landscape Character Assessment, 2016 (SD27) and a Settlement Character Assessment, 2016 (SD28), an Open Space Strategy, 2017 (SD37) and a Playing Pitch Strategy, 2017 (SD30) that have all influenced understanding of the provision of green space and the selection of sites and policy production.	None suggested.
43		Policy CI 4: Community Facilities	No main issues arising.	n/a	n/a
44	Environmental and Resource Management	Policy RM 1: Water Quality and Supply	No main issues arising.	n/a	n/a
45		Policy RM 2: Flood Risk	No main issues arising.	n/a	n/a

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46		Policy RM 5: Ground Contamination and Groundwater Pollution	No main issues arising.	n/a	n/a
47		Policy RM 6: Waste and Minerals	No main issues arising.	n/a	n/a
48		Policy RM 7: Renewable and Low Carbon Energy	No main issues arising.	n/a	n/a
49	Allocations		<p>Certain sites (GTA1, AIB3, CRK1, TIS2 and BRO1) have issues concerning their impact on heritage assets, which have not been resolved. Other reoccurring issues raised across the policies for allocations are:</p> <ul style="list-style-type: none"> • Increase in traffic and pollution • Increased safety risk to the young and elderly residents through additional traffic. • Increased risk of flooding. • Adverse impact on the character of the areas. • Loss of open space. • No employment opportunities to satisfy the demands for additional housing. • Sites being poorly related to the settlement, maximise development on brownfield sites before greenfield. 	<p>Modifications to the Plan seek to ensure there is a full understanding of the impact of proposals on the historic environment so that informed decisions can be made about the appropriateness of development. Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will be permitted only where a balanced judgement has been undertaken and the scale of any harm or loss to the significance of the heritage asset is justified. To support understanding of impacts a Heritage Impact Assessment has been prepared for each proposed allocation (SD24)</p> <p>The other issues raised in relation to the Policies for allocated sites have been considered through the plan preparation process and are considered to be sound.</p>	Amendments proposed (M15, M16, M17, M22, M56, M57, M82 and M87)

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			<ul style="list-style-type: none"> • Lack of adequate infrastructure. • Sites do not follow an appropriate spatial distribution strategy. • Alternative and additional allocations 		
50	Monitoring		No main issues arising	n/a	n/a
51	Replacement of Development Plans		No main issues arising.	n/a	n/a
52	Key Infrastructure Requirements		No main issues arising.	n/a	n/a
53	Local Green Space		No main issues arising.	n/a	n/a
54	Open Space, Sport and Recreation Standards		No main issues arising.	n/a	n/a