

Mid Sussex District Council

District Plan Review

## **Matters, Issues and Questions – Stage 1**

### Matter 3: Vision, Objectives and Spatial Strategy

September 2024



## Issue 1: Whether the Spatial Vision and Objectives for Mid Sussex Council are justified, effective, consistent with national policy and positively prepared?

### 30. Does the Spatial Vision for the 2018 District Plan remain relevant?

**Yes, the spatial vision for the 2018 District Plan remains relevant.**

- 30.1. The adopted District Plan [BD1, para 2.10] included the following spatial vision:
- “A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future”.*
- 30.2. The vision is underpinned by three priority themes – Environment, Economy and Social and supported by strategic objectives.
- 30.3. Aside from a minor change of wording referring to sustainability and resilience, there is no new evidence or change in circumstances that required a change to the spatial vision of the submitted Plan, which is set out on page 27.
- 30.4. The submitted District Plan (page 32) explains the relationship between the spatial strategy in the adopted and proposed District Plans. The adopted District Plan spatial strategy focused development at the three towns (Burgess Hill, East Grinstead and Haywards Heath) with proportionate growth at other settlements. This strategy guided allocation of sites in the District Plan and subsequent Site Allocations DPD, some of which form commitments as set out in policy **DPH1: Housing**. This is reflective of the third strategy principle *“Growth at existing sustainable settlements where it continues to be sustainable to do so”*. (page 36)
- 30.5. As described in the Plan, the review process sought to determine whether the 2018 strategy could be completely relied on to cater for the extended plan period to 2039 and increased housing need. The process concluded that, after consideration of constraints, committed sites and site deliverability/suitability, the Plan would not meet the district’s housing need if it solely relied upon the 2018 Plan strategy.
- 30.6. The process concluded some areas of the district had higher potential for growth than others. This included consideration of the potential for infrastructure improvements and provision of new facilities and services which could improve sustainability. As a result and to ensure the housing need could be met, a fourth strategy principle has been introduced in the submitted Plan - *“Opportunities for extensions, to improve sustainability of existing settlements”* (page 38).
- 30.7. Further information on the Council’s consideration of options and Strategy are set out in the remaining questions under this Matter.

**31. Are the Plan objectives which have been identified relevant; justified; and consistent with National Policy?**

**Yes, the Plan objectives are relevant and justified. The Council is satisfied that the Plan objectives are consistent with National Policy.**

- 31.1. The Plan has 15 Strategic Objectives that guide the strategy and policies of the Plan. The objectives are based on those set out in the adopted District Plan; they continue to reflect the Environmental, Economic and Social challenges facing the district and inform policies which themselves are consistent with national policy. As described in response to Q16, these policies reflect the Council's strategic objectives as required by the Framework. Therefore, they are relevant to Mid Sussex and are justified in that, collectively, they will facilitate the delivery of the spatial vision of the Plan.

**32. Is the Plan period justified, effective and consistent with national policy in particular paragraph 22 of the Framework? Should it be extended, if so, why?**

**The Submitted District Plan has a Plan Period of 2021 – 2039. This is an 18 year Plan period, which the Council considers to be justified and effective. A modification is proposed to ensure the plan provides for 15-years post-adoption.**

- 32.1. The Plan has a start date of 2021, which relates to the date work started on the review of the Adopted District Plan and the evidence base prepared to inform the District Plan review.
- 32.2. Paragraph 22 of NPPF requires strategic policies to look ahead over a minimum 15-year period from adoption.
- 32.3. As described in response to MIQs Question 1, the timetable for the preparation of the Plan as set out in the Local Development Scheme (LDS, 2024) [P1] anticipated submission in spring 2024 but due to the General Election and requisite pre-election period submission was delayed. The LDS anticipated adoption of the Plan in late 2024, adoption is now anticipated to be in early 2025.
- 32.4. In order for the Plan to cover a 15 year period from date of adoption (as required by NPPF Sept 2023, para 20) the Plan period will need to be extended from 2039 to 2040. A proposed modification [DP2, M1] has been submitted with the Plan. This change would ensure consistency with paragraph 22 of the Framework in the event the Plan is not adopted in 2024.

Issue 2: Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?

**33. Chapter 6 of the Plan relates to the District Plan Strategy. However, there is no explicit strategy within the Plan as submitted rather four principles and a distribution of development based on commitments, and existing and proposed allocations. Is there an overall spatial strategy which sets out the pattern, scale and design quality of places and makes sufficient provision for development and infrastructure as required by paragraph 20 of the Framework? If so, how would this strategy influence decision- making, and has it been positively prepared, justified, and effective?**

**Collectively, the four key principles and the distribution of development form the District Plan Strategy. Chapter 6 “District Plan Strategy” sets out the overall strategy for the pattern, scale and design quality of places, as required by paragraph 20 of the Framework. The Key Diagram (Submitted District Plan, page 42) shows visually the pattern of future growth and is reflected in the Strategic policies in the Plan.**

- 33.1. **Chapter 6** of the Plan, identifies the four key principles that form the strategy for growth, beyond that already planned for through the Adopted District Plan and Site Allocations Development Plan Document [BD2]. **Chapter 6** sets out how each principle will be achieved and why it is necessary, including how they relate to and are consistent with national planning policy. Collectively this chapter sets the framework for the pattern and scale of growth in the district within the plan period.
- 33.2. The Vision, Strategic Objectives, Strategy and the Strategic policies of the Plan make it clear where growth will be supported and the areas where valued landscapes are to be protected in accordance with the Framework. The Plan strategy is positively prepared as it seeks to balance the need for growth alongside the need to protect the special characteristics of the natural environment. It is justified as it is consistent with national policy and is effective as it will deliver the vision and strategic objectives of the Plan.
- 33.3. The Council’s response to Matter 1, question 16, provides further explanation of how the Plan meets the requirements of NPPF paragraph 20 and specifically how it makes sufficient provision for development and infrastructure.

### **34. Does the spatial strategy make the effective use of land including previously developed land?**

**The Council considers that the spatial strategy does make effective use of land including previously developed land.**

- 34.1. The Council is keen to make use of all brownfield opportunities although these are limited in a rural area such as Mid Sussex.
- 34.2. Despite this the Submitted District Plan ('the Plan') [DP1] allocates two brownfield sites, **DPA3: Burgess Hill Station** and **DPA8: Orchards Shopping Centre, Haywards Heath**. Approximately 66% of DPA3 is previously developed land, whilst DPA8 is entirely previously developed land.
- 34.3. In addition to the identified allocations, a windfall allowance, informed by the Council's Urban Capacity Study (UCS) [H3] is identified within Policy **DPH1: Housing** of the Plan [DP1]. The UCS [H3] assesses a range of sources of potential housing supply within the district's Category 1 and 2 settlements; the three main towns and larger villages.
- 34.4. The UCS [H3] concludes that a potential total of 466 dwellings could come forward on larger identifiable sites (i.e. redevelopment of under-utilised sites) and a further 1,302 dwellings from projected completions on small sites (less than 5 dwellings) based on historic delivery and other non-identifiable sites (i.e. prior approvals).
- 34.5. The total quantum of dwellings set out above accounts for approximately a third of the local housing need once commitments and completions have been accounted for.
- 34.6. Further detail on the consideration of density and maximising the yield from allocated sites is provided in response to MIQs Question 38.
- 34.7. The Council considers that, within the context of being a predominantly rural district with limited large-scale redevelopment opportunities, the spatial strategy sets out the most appropriate and effective use of land, including previously developed land.

### **35. Is this strategy sufficiently clear to decision-makers, developers, and local communities as to where the majority of new development including infrastructure will be located? Is it consistent with the policies of the Plan?**

**The strategy of the Plan is sufficiently clear and sets out where the majority of new development including infrastructure will be located. The strategy is consistent with the policies of the Plan.**

- 35.1. **Chapter 6**, of the Plan, page 34 – 39, explains how each of the four principles relate to the Strategic Objectives of the Plan and to which specific policies each

principle directly relates. The strategic policies and site allocations each relate to the four principles. Individual site allocations also set out the on and off-site infrastructure requirements for each site and these relate directly to the Infrastructure Delivery Plan (IDP) [IV1].

- 35.2. The **Key Diagram** (Submitted District Plan, page 42 [DP1]) provides a visual representation of the strategy of the Plan. The Policies Map [DP3] also visually sets out existing and proposed allocations. The individual maps supporting each allocation also identifies areas for on-site infrastructure and areas safeguarded for off-site infrastructure where necessary.

### **36. How were the settlements defined as different categories and how did the Council decide on the scale and level of growth attributed to the different areas/settlements in the Plan? Is this justified?**

How were the settlements defined as different categories?

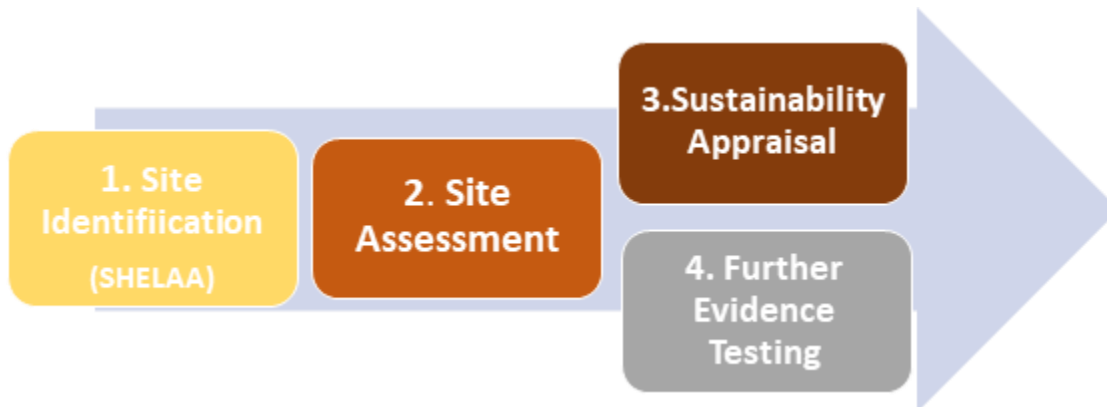
- 36.1. **The Settlement Sustainability Review (2015) [ENV16] provides the evidence.** The Settlement Hierarchy as set out in Table 1 of the Submitted District Plan was developed in respect to the adopted District Plan. An assessment of the characteristics and function of each settlement in the district was undertaken. This included an assessment of the local services, such as education, employment, retail and public transport links. The principles and findings of the Settlement Sustainability Review remain relevant and no changes to the hierarchy are required as a result.

How did the Council decide on the scale and level of growth attributed to the different areas/settlements in the Plan?

- 36.2. Detailed work on the settlement hierarchy and distribution of growth was carried out for the adopted District Plan and concluded as sound by the Inspector [BD4, Issue 1]. This formed the basis and strategy for the distribution of growth in the Site Allocations DPD adopted in 2022.
- 36.3. It should be noted that of the 20,616 total housing supply set out in policy **DPH1: Housing**, 12,161 dwellings have already been committed or completed which were in accordance with the adopted District Plan strategy and subsequent Sites DPD.
- 36.4. The allocations proposed in the submitted District Plan and scale/distribution of growth are led by the new plan strategy and evidence base - specially the consideration of:
- location of deliverable/sustainable sites identified in the Strategic Housing Land Availability Assessment (SHELAA)
  - the environmental constraints (e.g. High Weald AONB)
  - infrastructure constraints (e.g. highway network constraints)
  - existing committed development (e.g. adopted District Plan allocations)

36.5. The Site Selection Methodology [[SSP1](#)] explains the robust and transparent site assessment process, which informed decisions in respect to the Plan strategy and site allocations. The site selection process was developed to determine the most sustainable and developable sites, which ensured that site selection was consistent with the principles of sustainable development and consistent with the policies in the NPPF. The methodology was subject to consultation with neighbouring local authorities and development industry representatives.

36.6. The site selection process is summarised as follows:

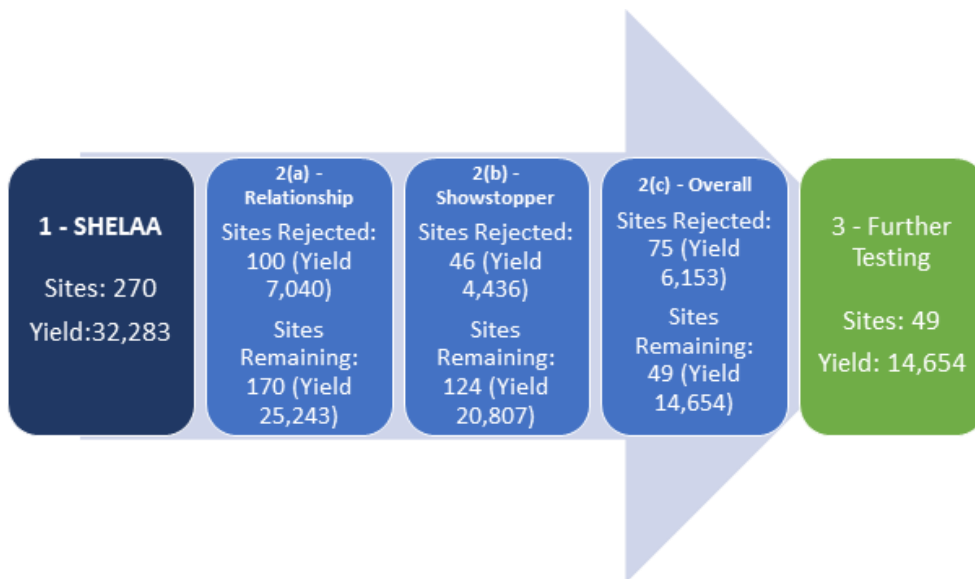


36.7. The site assessment process is a three step process as set out below:



36.8. A detailed explanation of this process can be found on pages 7 – 12 of [[SSP1](#)].

36.9. The Site Selection Conclusions Paper [[SSP2](#)], section 3, explains how the pool of 270 sites in the Strategic Housing Land Availability assessment were refined to a pool of 49 sites identified for further testing. The further testing including assessment through the Sustainability Appraisal and Transport Modelling.



36.10. Specific consideration was given to sites proposing a yield of 1,000 dwellings or more, known as Significant Sites. This is explained further in [SSP2] at paragraphs 3.3 – 3.38.

36.11. In conclusion, the site selection process has informed the development of the strategy for growth which identifies three Sustainable communities and 17 smaller sites as sustainable allocations in the Plan.

Is this justified?

36.12. **Yes, because it has been informed by a robust and transparent evidence base.** The evidence base including the Sustainability Appraisal and Site Selection papers have informed the strategy for growth and sites to be allocated to achieve it. It is the Councils view that this represents the most sustainable pattern of development for Mid Sussex over the plan period.

**37. How does the spatial strategy and the distribution of development relate to neighbouring settlements outside of the District such as Crawley to the north?**

**The spatial strategy is focussed on the Settlement Hierarchy set out in the submitted District Plan [DP1, page 39-40]. All the allocations proposed are extensions to existing Mid Sussex Settlements aside from DPSC2: Crabbet Park which adjoins the Mid Sussex village of Copthorne and Crawley.**

37.1. The distribution of development within the submitted District Plan is in full accordance with the District Plan Strategy [DP1, page 33], with specific reference to the third and fourth objectives:

- Growth at existing sustainable settlements where it continues to be sustainable to do so



- Opportunities for extensions, to improve sustainability of existing settlements
- 37.2. All the allocations proposed adjoin an existing Mid Sussex settlement boundary with the exception of **DPSC2: Land at Crabbet Park**, which adjoins the Mid Sussex settlement of Copthorne (a “Category 2 – Larger Village” settlement) and it is also closely related to Crawley. However, the site does not physically adjoin Crawley’s boundary because it is separated by the M23 motorway.
- 37.3. This site has been allocated as a Sustainable Community, the principle of which is to provide a quantum of growth that will support the provision of new services and facilities on-site to meet day-to-day needs in order to be as self-sustaining. The submitted District Plan [DP1, page 160] notes that **DPSC2: Land at Crabbet Park** adjoins the town of Crawley (within Crawley Borough), and its location is therefore in close proximity to existing services and facilities such as public transport links and town centres which will encourage localised journeys. It is therefore recognised that this site would fall within the “growth at existing settlements where it continues to be sustainable to do so” with respect to both Copthorne village and Crawley outside the district.
- 37.4. The impacts of development on both Mid Sussex and Crawley have been taken into account within the evidence base, in particular the Transport Studies [[T1 - T11](#)].

**38. Is the strategy and distribution of development consistent with paragraph 105 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are, or can be made sustainable and paragraph 124 of the Framework which references the need to achieve appropriate densities so as to optimise the use of land in their area?**

**The strategy is consistent with paragraph 105 and 124 of the Framework and with the Plan Strategy objectives.**

- 38.1. Paragraph 105 of the NPPF states:
- “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”*
- 38.2. The Plan Strategy [[DP1](#), page 33] is based on four key principles, the following two are entirely consistent with paragraph 105:
- Growth at existing sustainable settlements where it continues to be sustainable to do so
  - Opportunities for extensions, to improve sustainability of existing settlements

- 38.3. All the proposed allocations within the submitted District Plan [DP1] are consistent with these objectives they are either at a sustainable location or in a location that will become sustainable.
- 38.4. The submitted District Plan [DP1, pages 37 – 39] explains that expansion of existing settlements will help to provide the critical mass to support viable sustainable travel solutions and improved active travel connectivity to support the delivery of 20-minute neighbourhoods. This would be achieved by providing a quantum of development (such as at significant sites DPSC1 – DPSC3) to support the provision of local infrastructure. This would not only benefit new residents but would also existing residents. These locations often have a limited range of existing services; therefore, provision of new services will limit the need to travel further afield and encourage localised trips and active travel and creation of 20-minute neighbourhoods.
- 38.5. Paragraph 124 states “*Planning policies and decisions should support development that makes efficient use of land*” taking account of a series of considerations. The principal strategy in the submitted District Plan is to make effective use of land and is therefore fully compliant with national policy.
- 38.6. The submitted District Plan [DP1, page 35] explains how the Plan will achieve this. This includes promotion of identified brownfield sites, a windfall allowance that draws on the findings of the Urban Capacity Study [H3] and policy DPH3: **Sustainable Development: Inside the Built-Up Area** which supports development within town and village boundaries (including infill and redevelopment) subject to compliance with other policies within the Plan.
- 38.7. This element of the Plan Strategy is also concerned with making efficient use of greenfield sites to maximise yields where appropriate and in accordance with national policy. The yield for each proposed allocation has been determined on a site-by-site basis, taking an evidence-led approach considering landscape, prevailing character, setting and constraints (such as heritage). This ensures the sites are optimised and brought forward for as high a yield as appropriate.

### **39. How have the constraints within the District, such as the High Weald Area of Outstanding Natural Beauty and the setting of the South Downs National Park influenced the strategy of the Plan?**

**Protected landscapes are firmly embedded in the strategy of the Submitted District Plan. This and other constraints are also taken into account in the spatial strategy (distribution of future growth) and the site selection process.**

- 39.1. National policy is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty (AONBs) which have the highest status of protection (NPPF Sept 2023, paragraph 176).

- 39.2. One of the four principles of the Submitted District Plan Strategy is 'Protection of the High Weald AONB' [DP1, page 33]. A modification is proposed to this wording to expand it to 'Conservation and enhancement of the High Weald AONB and South Downs National Park' following comments received from Natural England [DP2, M6].
- 39.3. The Strategic Objectives guide the overall strategy of the Plan and the policies within it. Constraints are reflected in the Strategic Objectives for the Plan. For example, Strategic Objective 4 concerns protection of valued landscapes and Objective 5 relates to protecting the valued characteristics of the built environment [DP1, page 28].
- 39.4. In relation to areas for potential for future growth, the Plan explains that given the environmental and infrastructure constraints within some areas of the district, some areas have higher potential for growth than others [DP1, page 32]. This has led to the proposed distribution of housing [DP1, page 41].
- 39.5. Landscape is included as an environmental constraint in the site selection criteria [Site Selection Methodology, SSP1]. As explained in the Site Selection Methodology, Stage 2 of the site selection process is a detailed assessment of the SHELAA sites. This includes three steps by which sites can be rejected resulting in a final shortlist of sites for further testing at Stage 3. This ensures that only the most suitable, sustainable and deliverable sites are proposed for allocation. Sites that were deemed to have a 'Very Negative' impact on the High Weald AONB are 'showstoppers' at Stage 2(b). This means that sites with the greatest constraints were excluded from further assessment as they do not represent sustainable development.
- 39.6. This principle for protection of protected landscapes is carried forward in the Plan in **Policy DPC4: High Weald Area of Outstanding Natural Beauty** and **Policy DPC5: Setting of the South Downs National Park**.
- 39.7. Two background papers [ENV6 and ENV7] have been prepared to assess the impact of potential housing sites on the High Weald AONB and to assess if the proposed site allocations could be considered to be major development in line with paragraph 177 of the NPPF. Another background paper [ENV8] has been prepared to assess the impact of potential housing sites on the setting of the South Downs National Park. These background papers informed the site selection process.
- 39.8. This process has resulted in three proposed site allocations within the High Weald AONB which total 57 dwellings (plus older persons' accommodation):
- **DPA4: Land off West Hoathly Road, East Grinstead** – Up to 45 dwellings
  - **DPA13: The Paddocks, Lewes Road, Ashurst Wood** – 8-12 dwellings
  - **DPA19: Land at Hyde Lodge, Handcross** – Provision of older persons' accommodation
- 39.9. The Major Development in the High Weald AONB background paper [ENV7] concludes that none of these proposed site allocations result in major development in the High Weald AONB.

#### **40. To what extent was the preferred combination of options 1 and 2 chosen on the basis of a justified and proportionate evidence base?**

**The findings of the Council’s evidence base resulted in the selection of the combination of options 1 and 2 for the purpose of the growth strategy. It transparently sets out the range of sites, considered to be reasonable alternatives, which would allow the Council to meet its housing need. The preferred combination of options 1 and 2 were chosen on the basis of a justified and proportionate evidence base.**

- 40.1. The Sustainability Appraisal (SA) [DP7] identified 5 potential Spatial Options and informed the selection of the combination of Options 1 and 2:
- **Option 1:** Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth. This option informed the third strategy principle *“Growth at existing sustainable settlements where it continues to be sustainable to do so”*.
  - **Option 2:** Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care whilst recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities. This option informed the fourth strategy principles *“Opportunities for extensions to improve sustainability of existing settlements”*.
- 40.2. As set out in the Housing Need and Requirement Topic Paper [H5], the SA forms part of a portfolio of interlinked documents developed to support the preparation of the Plan. Its key role is to assess reasonable alternatives as required by legislation and guidance.
- 40.3. The assessment of the plan strategy is a pivotal part of the SA process as it appraises the sustainability credentials of reasonable alternatives for future growth patterns and shows whether the chosen approach is sustainable. The Site Selection process gauges the suitability, availability and deliverability of sites. Its findings were integral to identifying spatial options by showing the undeliverable options that would not be reasonable alternatives.
- 40.4. The Site Selection Methodology [SSP1] provides a full overview of the process followed and how its outcomes were guided by a robust and transparent evidence base at each stage. It allowed the Council to develop spatial options, at an early stage, in full cognisance of the characteristics of the options for sites. Options considered can be reviewed in section 4 of the SA report [DP7, p.58]. They were considered against each of the SA objectives to determine which is the most

sustainable approach. Full assessments are set out under Appendix A [DP7, p.A-1]. More detailed commentary is provided for each option and the reasons for the proposed scoring [DP7, p. A-9 – A-39]. As the plan preparation progressed, the Council had to consider the feasibility of the options identified as the pool of reasonable alternatives for sites was established through the Site Selection process. This informed the selection of the preferred combination of options 1 and 2 which is set out in full in Appendix A of the SA report [DP7, p. A-7].

**41. Does the spatial strategy look sufficiently further ahead, particularly in relation to larger developments that go beyond the Plan period, such as DPSC1: Land to the West of Burgess Hill/ North of Hurstpierpoint; DPSC2: Land at Crabbet Park and DPSC3: Land to the south of Reeds Lane, Sayers Common?**

**The spatial strategy looks ahead to an appropriate timeframe in respect of the three significant sites.**

- 41.1. Site **DPSC1: Land west of Burgess Hill/ North of Hurstpierpoint** will be delivered in full within the Submitted District Plan ('the Plan') period. For significant sites **DPSC2: Land at Crabbet Park** and **DPSC3: Land to the south of Reeds Lane**, the Plan [DP1] shows approximately 500 dwellings and 150 dwellings, respectively, being delivered outside the Plan period. However, **DPSC2: Land at Crabbet Park** and **DPSC3: Land to the south of Reeds Lane** are expected to deliver much of the residential and infrastructure in the Plan period. Development beyond the Plan period is expected to be limited to residual dwellings and will be delivered immediately post the Plan period scheduled for 2040/41 and 2041/ 42.
- 41.2. Both **DPSC2: Land at Crabbet Park** and **DPSC3: Land to the south of Reeds Lane** clearly outline the indicative development capacity and infrastructure requirements for the total proposed development including the development to be delivered post plan-period, providing sufficient certainty for the full quantum of development.
- 41.3. The proposed modification (M1) in the Schedule of Proposed Modifications [DP2] seeks to extend the Plan period by a year resulting in a greater proportion of development being delivered within the Plan period, and means **DPSC3: Reeds Lane, Sayers Common** will be delivered in full by the new end year of 2040.
- 41.4. The Council concludes that there is no reason to look further ahead than the plan period, and that the requirements to set a vision that looks 30 years ahead (as set out in paragraph 22 of the NPPF) are not applicable.

## 42. What reasonable alternative options were considered as part of the Plan’s preparation and why were they discounted?

The Submitted District Plan is supported by a Pre-submission Sustainability Appraisal (SA) [DP7]. Section 4 of the SA [DP7, p. 56] sets out the reasonable alternatives considered for each of the four principles of the Spatial Strategy and the findings of their assessment. This should be considered alongside Appendix A of the SA [DP7, p.A-1] which provides the assessment of the options in full and the rationale for selecting the preferred options.

- 42.1. For ease of reference the reasonable alternatives for the spatial strategy considered and the findings are summarised below.

**Table 11: Reasonable alternatives considered for the Spatial Strategy**

Principles	Alternatives	Outcomes
Protection of designated landscapes	No reasonable alternatives to accord with national policy and guidance	n/a
Making effective use of land	No reasonable alternatives to accord with national policy and guidance	n/a
Spatial options	<p>1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.</p> <p>2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.</p> <p>3: Creating a new sustainable settlement with associated facilities.</p> <p>4: Focus development in the three towns utilising existing facilities and transport links.</p> <p>5: Prioritise development on brownfield land.</p>	<p>1: would not enable sufficient sites to be allocated to meet housing need – <b>discounted as a standalone approach, preferred approach (in combination with option 2) where capacity exists</b></p> <p>2: <b>Preferred approach</b></p> <p>3: no available sites to deliver such strategy – <b>discounted</b></p> <p>4: limited growth potential in two of the three towns – <b>discounted</b></p> <p>5: unable to meet the housing need in full - <b>discounted</b></p>

**43. Are any main modifications necessary for soundness, if so, why?**

**The Council does not consider that main modifications are necessary for soundness and that it has submitted a Plan that is sound, in relation to the Vision, Objectives and Spatial Strategy of the Plan.**

- 43.1. In relation to the Vision, Objectives and Spatial Strategy of the Plan, the Council does not consider that main modifications are necessary for soundness.
- 43.2. However, as a result of comments received during the Regulation 19 consultation, the Council is proposing a small number of modifications to improve clarity for the Inspector's consideration. These are suggested in the Schedule of Proposed Modifications [\[DP2\]](#)