

# Central Lancashire Local Plan Examination

## Matters, Issues and Questions

**Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process  
(Policies SS1, SS2)**

**Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?**

**This matter focusses on the broad spatial distribution of new development and on the process by which proposed development sites have been selected for inclusion in the Plan (Policies SS1, and SS2). The merits of individual site allocations are considered under Matters 4 and 5 and 8).**

**2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2 supported by robust and up to date evidence and otherwise soundly based? In particular:**

Yes. The proposed spatial strategy and distribution of development is supported by robust and up-to-date evidence and is soundly based. The CLLP is supported by an up-to-date assessment of housing and employment needs which were updated prior to Regulation 19.

**a) Does it reflect the vision and objectives of the Plan?**

Yes. The CLLP's vision sets out broad aims themed on sustainable growth. More detailed Strategic Objectives follow, informing the basic principles of policies SS1 and SS2. Policy SS1 will help to realise all the objectives. Policy SS2 will realise Objective 2 specifically.

**b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?**

The distribution of development reflects the principles of NPPF (2023), specifically those set out in Paragraphs 7-11. Policy SS1 sets out the guiding principles for new development, with Parts 3-5 reflecting the role of settlements in delivering new growth, with the overarching aim to deliver sustainable development. The distribution of

development across the settlement hierarchy is reflective of the need to deliver development in the most sustainable locations. This is reflected in the level of development within each tier, with locations considered more sustainable being able to accommodate more growth.

In the CLA's response ([CLA03](#)) to the Inspectors initial questions ([ID01](#)), tables 1 and 2 set out the split of employment and housing allocations by tier. This supports what is set out in Policy SS2, which states Tier 1 will be the primary focus for development with the largest amount of new development directed here.

Tier 2 represents the largest settlements outside of Preston, and is the secondary focus for development, with Tier 3 representing the larger urban settlements across the plan area and again where higher levels of growth can be accommodated. The majority of development is therefore focussed on these upper tiers in line with the Spatial Strategy, specifically Criterion 1(b) which seeks to make use of land in the existing built up and urban locations in line with Paragraph 11 (a) of NPPF (2023 and 2024).

Less development is proposed in tier 4 and 5 settlements across the plan area as these areas typically have fewer services available and are more rural. It should be noted that there are a larger number of settlements in tier 5 than tier 4, which accounts for there collectively being a larger amount of proposed housing development in tier 5 than tier 4 in South Ribble and Chorley. For Preston this is discussed in more detail below.

The level and distribution of housing growth proposed across the plan area is linked to the economic growth of each area, as set out in the Central Lancashire Housing Study (HO04 and HO09 updated) with the Councils opting for an employment led scenario for housing growth ensuring opportunities for new employment are aligned with housing growth.

Tiers 1 and 2 provide the greatest opportunities for employment growth, therefore the housing provided in these tiers needs to support the new jobs to be created, as such the levels of housing and employment growth in these two tiers are reflective of each other in the percentage of development proposed. Tiers 1 and 2 are also considered to have the infrastructure required to support higher levels of growth either in place already or planned to enable sustainable development, including a new train station (Cottam Parkway).

In addition, the existing Chorley and South Ribble Local Plans currently allocate safeguarded land identified as areas for possible future growth. Where this land is

unconstrained in accordance with the SHELAA, this has been identified for allocation for development through this plan, enabling planned sustainable growth to come forward within Chorley and South Ribble.

**c) Is the focus on the larger urban settlements justified and soundly based?**

Yes. As noted in the answer to 2.1 (b), the focus on larger settlements is reflective of the ambition of the CLLP's vision to deliver growth and regeneration of our city and town centres, it is vital that both economic and housing growth support this aim and the identification of land for development in the CLLP is reflective of this. Focussing development on tiers at the top of the hierarchy recognises the sustainability of these locations in terms of access to transport, jobs, education and local amenities.

**d) How were the proportions of development proposed for each settlement arrived at?**

As noted in the answer to 2.1 (b), in line with the vision, and policies SS1 and SS2, the CLLP sought to identify new development primarily within the higher tiers, with the key focus on Tier 1, Preston main urban area.

The precise levels of distribution across settlements is reflective of the most up to date evidence, most notably the SHELAA ([HO14a-e](#)) and each Council's Housing Land Supply Position (the most up to date documents being [MO04](#), [MO05](#) and [MO06](#)), together with the aim of delivering the plan's vision of growth and regeneration of our city and town centres. Collectively, these documents identify where capacity exists through existing commitments and new sites to meet the housing requirement for the CLA's across the plan period. Where development was in line with the SHELAA and complied with the spatial strategy, sites have been allocated for development across the plan area.

As noted above, housing development in Tiers 1 and 2 is reflective of the level of employment growth to ensure new homes are provided to support the new jobs created, the actual percentage split across each settlement being set out in Tables 1 and 2 of document [CLA03](#). Development in the lower Tiers was not proportioned in the same way, as generally, the lower Tiers, particularly Tiers 4 and 5 offer less opportunity for employment growth. The allocations in Tiers 3-5 include sites already allocated in existing plans and those sites with planning permission not yet built out. Additional growth in these areas was considered in line with the level of services available in the area and its ability to accommodate additional growth. Sites capable of meeting the

requirements of the plan within an existing settlement boundary have been allocated where it was considered acceptable through the SHELAA and conformed to the Spatial Strategy.

Whilst the approach to the allocation of growth in the extant Core Strategy and Local Plans sought to direct growth to specific settlements and was more restrictive of growth in other areas, the CLLP has taken a more positive approach to development and reflects the ability for growth across all settlements regardless of tier, enabling development to be delivered sustainably across the plan areas as a whole. This is therefore reflected in growth being delivered across the whole plan area.

**e) Would it provide sufficient development within rural areas and other settlements?**

Yes. It is considered that there are sufficient opportunities provided and the growth proposed in the lower tiers is reflective of the level of services which those areas can support.

In addition, all three Councils note within their housing land supply, developments of 10 units or below. A considerable proportion of these developments tend to come forward in the more rural areas as windfall sites and the strategy put forward in the plan would not prevent such development opportunities occurring.

**f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?**

Yes. The updated Central Lancashire Housing Study (HO09) takes account of all available data on economic growth, including the Lancashire Econometric Model which was developed as part of the Lancashire Independent Economic Review ([ER04](#)), and this work has fed into the recently published Lancashire Growth Plan ([ER04](#)). It also considered the City Deal ([ER08](#)) growth plan for Preston and South Ribble.

The responses to Matter 3 on housing requirement and Matter 8 employment land need provide more detail on how these programmes and strategies have identified the level of growth required over the plan period and how the allocations identified in the CLLP support this. They also address the representations received which argue that the plan has failed to consider the National Cyber Force (NCF) in its forecasts. Please see answers to Question 3.4 and 8.1 for more detail on this specific issue.

**2.2 What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?**

The evidence base for the settlement hierarchy originates back to work underpinning the Central Lancashire Core Strategy through the Central Lancashire Community Profile Study (2008 and Chorley update 2009) (CLA06 a)-e) + CLA07) and this is consistent across the CLA's. The Community Profile studies were undertaken to aid an understanding of the role and function of a wide range of settlements in Central Lancashire. These range from the well serviced Key Service Centre of Leyland, down to small scale rural settlements such as Heath Charnock and Rivington in Chorley.

In total, 35 communities were profiled across the three districts in Central Lancashire. The CLA's have updated information relating to the level of services provided at each of the settlements and assessed whether provision has changed. The retail centres have also been reviewed as part of the individual Retail and Leisure Studies completed for the CLA's in 2017 for SRBC and 2019 CBC and PCC ([ER01](#)(Section 5), [ER02](#) (Section 4) and [ER03](#) (Section 4)). This was also reported on in the Central Lancashire Retail Studies Update 2025, with Chapter 4 and Appendix containing the relevant information.

In reviewing the development strategy, other factors that have influenced settlements have been recent planning permissions, with boundaries being updated in Preston to reflect where settlements have expanded into open countryside since the last plan. The main physical constraint on the rural settlements is the surrounding land use of open countryside and/or Green Belt as well as landscape character which influence the pattern of development. The authorities have not identified a need to review Green Belt boundaries through this plan and have instead released all suitable safeguarded land (identified in the existing development Plan).

**2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?**

In preparing the plan, the CLA's looked at a range of options for housing and economic growth, these are set out within the Central Lancashire Housing Study ([HO09](#)) and the Central Lancashire Employment Land Study ([ER05](#) and [ER06](#) and ER06 appendices 1-4), with the options proposed and the justification for the recommended option for the

CLLP set out in the reports. In addition, the options presented have been tested through the Integrated Assessment (IA) ([CD05](#)).

Five spatial options were considered and the findings of these are also set out in the IA ([CD05](#)). The five options are explained on page 65 of this report (paragraph 4.9) and in summary are:

Option 1: Roll forward the current approach

Option 2: Urban Intensification

Option 3: More Urban Extensions

Option 4: A more Dispersed (transport led) pattern of development; and

Option 5: A new settlement(s)

The Issues and Options report ([RD04](#)) set out the initial process for considering where growth should be located in the Chapter entitled Locations for Future growth. This document set out the initial considerations for growth, starting with the continuation on the Core Strategy approach and seeking views on how future growth should be planned. The responses in the Issues and Options Outcomes Report ([CD09b](#)) (questions 61 and 62 specifically) discuss the findings and identified that the existing approach needed to be more flexible to support growth in wider areas than the current Core Strategy enables. There was also general support for growth on brownfield land and regeneration of town and city centres. It was also reflected in responses the need for growth to be sustainable.

This work fed into the approach set out for delivering growth in the Preferred Options ([RD05](#)) consultation. Chapter 3 sets out the spatial approach which indicates that key locations in the Core Strategy will continue to be the main focus of growth, recognising those areas where housing and employment sites are still in delivery in support of the City Deal following significant infrastructure investment, but additional growth beyond those locations is also required. Section 3.7 of this document then sets out the approach beyond the existing sites in the Core Strategy. This approach considers the delivery of Option 1, 2 and 3 above, as well as gradually rebalancing the focus of housing delivery from Preston towards South Ribble and Chorley following infrastructure delivery in those areas (Policy Direction 2). This consultation also considered the need for longer term growth beyond the CLLP and how that could be delivered, this was set out in Policy Direction 5. A question was also asked in Policy Direction 6 regarding the settlement hierarchy and the level of the focus of growth to each Tier.

The outcomes report ([CD09c](#)) from this consultation sets out the feedback to those proposals, with comments generally in support of the pattern of growth suggested in Policy Direction 6. There was mixed response for a standalone large new settlement and the proposals for longer term growth for a 30 year vision, with instead a general preference towards use of safeguarded land in the extant plan along with regeneration of existing towns and villages before the plan considers the need for large greenfield release. It was also felt that focusing development away from our existing main town centres may cause un-even development distribution where housing would be concentrated away from areas providing employment. These factors all played into the consideration of which option for growth represented the best position for Central Lancashire.

Responses to the Preferred Options also noted that development proposed needed to align with what was set out in Policy Direction 1 in order for the plan to be able to deliver on its climate friendly and resilient places approach to development. Responses to the spatial development priorities in this consultation also focused on a desire to protect Green Belt and focus development in areas around existing towns and cities where infrastructure is already established.

Whilst the Integrated Assessment (IA) ([CD05](#)) identified in general that all options performed broadly positively against social and economic objectives (paragraph 4.10), but more negatively in relation to environmental, it was noted there was less differentiation between the effects of Options 1-4 compared to Option 5. The IA noted that the delivery of a new standalone settlement (Option 5) could have particularly pronounced negative effects on the landscape and use of land depending on where it could be located.

The overall approach to growth was therefore to proceed under Option 1 as a starting point supporting the delivery of the existing Core Strategy sites and the settlement hierarchy approach. However, in recognition of the comments made about the existing restrictions under that strategy, and as noted under answer 2.1(d), the CLLP has taken a more positive approach to development and reflects the ability for growth across all settlements regardless of tier, enabling development to be delivered sustainably across the plan areas as a whole. This reflects the principles of the approaches put forward as part of Option 2 and 3.

The settlement hierarchy approach to delivering growth as set out in Option 1 is therefore the main means of delivering growth, along with sustainable urban extensions (option 3) and continued support for growth and regeneration in existing urban areas

(option 2) aligning with the responses received through issues and options and preferred options and the findings of the IA (CD05).

Option 4 focuses development on existing public transport corridors. Whilst it still adopts a settlement hierarchy approach, its growth is focussed on areas where existing sustainable transport can support growth. It was not considered that this option on its own would identify sufficient opportunities for employment and housing needs to be met. This is also supported by the findings of the IA (CD05).

Option 5 required the delivery of a new standalone settlement(s). The responses at preferred options and issues and options highlighted the importance of aligning housing growth with employment opportunities, this was considered better delivered through option 1, supported by a urban intensification across settlements in Tiers 1 and 2 (option 2) and a further expansion of the urban area in Preston, Tier 1 (option 3) at Preston West. An urban extension in this location was already supported by planned transport connections (Cottam Parkway) and has access to existing employment areas within Preston.

The Housing Topic Paper – Approach to housing need and distribution ([TP01](#)), also provides a summary of the reasoning behind the chosen housing growth scenario and the approach to redistribution of this need across the plan area as a whole.

#### **2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?**

The process for identifying and assessing potential sites for housing, employment and mixed-use allocations is set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (HO14a – HO14e). This process is summarised in the evidence document Housing and Employment Allocations: Site Selection Process ([HO15](#)). The SHELAA methodology is robust and follows an objective process. It follows the requirements set out in NPPF(2023) and PPG ([housing and economic land availability assessment section](#)).

Stage 1(a) of the SHELAA identifies how potential sites were identified. All sites suggested to the CLAs for housing and employment allocation, and other potential sites identified by the CLAs, were assessed through the SHELAA with the exception of Green Belt sites that were not previously developed. These sites were ‘parked’ until the

assessment of sites located outside of the Green Belt had been concluded and it had been established whether Green Belt release was required.

The sites were subject to an initial assessment under Stage 1(b) of the SHELAA. The SHELAA identifies the specific constraints that resulted in a site being discounted at this stage.

The remaining sites were subject to a more detailed assessment under Stage 2 of the SHELAA. This included technical assessments undertaken by consultants on behalf of the CLAs as well as the finding of the IA and HRA.

Following the assessments, all sites identified as being suitable, available and achievable and which conformed to the spatial strategy were allocated in the Submission CLLP.

**a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?**

The methodology set out in the SHELAA is transparent and clearly sets out the process for identifying and assessing sites. The SHELAA site profiles (HO14c – HO14e) summarise the assessment of each site taken forward to Stage 2 of the SHELAA. Any identified constraints informed the decision on whether each site is suitable, available and achievable.

Constraints were identified through a range of sources including GIS mapping systems, site visits, consultation with stakeholders such as the Highways Authority, United Utilities, Natural England and the Environment Agency and through up-to-date evidence-based documents commissioned to support the CLLP including:

- Central Lancashire Strategic Flood Risk Assessment - Level 1 and 2 (FR01a – FR04d)
- Central Lancashire Local Plan: Integrated Assessment Development Site Options (RD03a – RD03biii)
- Central Lancashire Local Plan: Habitats Regulations Assessment Report ([CD07](#))
- Central Lancashire Local Plan Stage 0: Preliminary Transport Assessment ([IT06a](#))
- Central Lancashire Heritage Impact Assessment Methodology and Reports (HE01a and HE01b)

- Open Land Designations Study Landscape Assessment (EV09a-EV09d)

**b) Were constraints given relative weight in the site selection process? If so, how was this determined?**

Under Stage 1(b) of the SHELAA an initial assessment of sites was undertaken to identify any constraints. Those sites that were entirely affected by the national policies and designations listed in paragraph 2.12 of the SHELAA Main Report ([HO14a](#)) were discounted at this stage. In addition, sites were also discounted if they were subject to any other constraints that could not be mitigated such as contamination, no suitable access, or the site had been developed or granted planning permission for an alternative use. These were considered to be absolute constraints and therefore the site was determined not to be suitable for development.

Under Stage 2 of the SHELAA a more detailed assessment of each site was undertaken to assess any constraints identified in Stage 1(b) in more detail and identify any further constraints. No standard weighting was applied to identified constraints. Instead, the significance of each constraint was determined by its severity and its potential for mitigation on a site by site basis. Sites were discounted if it was considered that the identified constraints could not be mitigated and would result in development of the site not being suitable, available or achievable.

The SHELAA site profiles (HO14c – HO14e) identify any constraints for each site and whether these constraints resulted in the site being discounted.

**c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?**

*Were sites at low risk preferred over those at greater risk?*

The NPPF requires plans to apply a sequential, risk-based approach to development locations (Paragraph 172) as followed by the Councils. Where sites within Flood Zones 2 and 3 have been allocated, the exception test has been satisfied.

*How did the Strategic Flood Risk Assessment (SFRA) inform site selection?*

The Site Selection Report (HO15) sets out that all sites taken forward to Stage 2 were subject to a more detailed assessment to determine if they are suitable, available, and achievable. The detailed assessments included Strategic Flood Risk Assessment (Level 1 and 2). Allocations were decided by taking into account the findings of the Stage 2 assessment of sites and the proposed spatial strategy and settlement hierarchy.

The flood risk information, assessment, guidance and recommendations identified in the Level 1 SFRA, provided the Council with the necessary information to apply the Sequential Test, as required under the NPPF. Appendix C of the report summarises for each site assessed through the site assessment methodology, the evidence and strategic recommendations identified in the Level 1 SFRA and included information on how the Council would progress (or not) with the site's allocation. It identified those sites that would require a Level 2 SFRA undertaking, to assess in more detail the depths and hazards of flooding, in order to demonstrate whether the second part of the Exception Test (part b) can be passed for applicable sites. The Level 2 SFRA included a detailed assessment of flood risk for multiple modelled exceedance probability events, both now and in the future, taking account of climate change using the EA's latest allowances on peak river flows at the time.

The information contained within both SFRA Levels 1 & 2 was used to inform the site selection process, including as part of the Sustainability Appraisal. Document HO1b lists all sites that were omitted from the site selection process as a result of SFRA Levels 1 & 2 information. Site specific flood risk information was also included within the Key Development Considerations for relevant site allocations within the Plan.

*Does the SFRA2 reflect the most up to date flood-mapping?*

Yes, SFRA Level 2 reflects the most up to date flood mapping - NAFRA 2 update as confirmed by the EA and agreed within the statement of common ground between ourselves and the EA ([DC04](#)).

*Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?*

Yes, detailed site proformas for each allocation provide information relating to flood risk and state where a Level 2 has been required, that issues identified through that must be addressed through the planning application process.

In determining applications, Policy EN10 is considered to represent an appropriate strategy to manage and address flood risk and will ensure that development is directed to areas of lowest flood risk, is safe from flooding across its lifetime and does not increase the risk of flooding elsewhere. The Councils consider that Policy EN10 is effective as it sets out clearly how the Council will seek to ensure that development is safe from flooding across its lifetime and establishes clear and appropriate criteria for developers to meet in order to comply with the Policy. Policy EN10 has been drafted in accordance with policy set out within the NPPF 2024 relating to planning and flood risk. In line with Paragraph 170 of the NPPF, Policy EN10 seeks to direct development away from areas at highest risk of flooding and where development of higher risk areas cannot be avoided, endeavours to ensure that development is safe from flooding from all sources across its lifetime.

**d) What account was taken of Best and Most Versatile Agricultural Land?**

In accordance with paragraph 180b) and footnote 62 of NPPF (2023), consideration was given to the best and most versatile agricultural land when assessing the suitability of sites for development, as set out in paragraph 2.18 of the SHELAA Main Report ([HO14a](#)).

At Stage1(b) of the SHELAA the agricultural classification of all sites being considered was identified using Natural England agricultural land classification maps. However, this mapping does not subdivide grade 3 agricultural land by grades 3a and 3b. Natural England's Post 1988 Agricultural Land Classification (ALC) maps were also reviewed to establish if any post 1988 surveys had been undertaken in Central Lancashire. These surveys subdivide grade 3. However very few areas in Central Lancashire had surveys, therefore for the majority of sites identified as grade 3 agricultural land, it was not possible to establish whether they were grade 3a or 3b.

The Integrated Assessment - Development Site Options ([RD03a](#)) sets out the assessment of all reasonable alternative development sites being considered for allocation in the CLLP under Stage 2 of the SHELAA. It helped to inform the selection of allocations alongside other assessments and evidence. It assesses each site against 18 objectives. Objective IA17 includes assessment criteria relating to the protection of the best and most versatile agricultural land and soil resources from inappropriate development. As there is no data available that subdivides grade 3 agricultural land, the IA properly recorded uncertain affects for those sites on grade 3 agricultural land.

In accordance with the CLLP spatial strategy, development has been prioritised within settlement boundaries, with a focus on city and town regeneration and the re-use of brownfield land.

In order to meet the housing and employment requirements, it was necessary to allocate all sites considered suitable, available and achievable through the SHELAA process. Some of these sites are grade 3 agricultural land, however many already have planning permission or are previously developed.

The only allocations on grade 1 and 2 agricultural land are sites that already have planning permission or where only a small part of the allocation was covered by the grade 1 or 2 agricultural land classification.

Policy EN16 requires an Agricultural Land Classification Report to be submitted as part of any planning application for developments that result in the loss of 0.5ha or greater of best and most versatile agricultural land. This would be required for all allocations and other development sites of 0.5ha or greater located on grades 1, 2 or 3a agricultural land. For grade 3 land, it will need to establish if the land is best and most versatile agricultural land under grade 3a, and if it is identified as grade 3a, to address the requirements of criteria a) to d) of the policy.

**2.5 Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?**

Yes. As noted in the response to the Inspectors Questions ([CLA03](#)), just over 10% of proposed housing allocations are within the Tiers 4 and 5. Development in Tier 5 also includes a large planned brownfield development at the site of the old Whittingham Hospital, which is providing additional community benefits to the surrounding villages through the provision of community facilities including a new primary school reflecting the requirements of paragraph 83 in supporting local services for the village of Whittingham and surrounding smaller settlements.

As noted in the response to Question 2.2 above, the settlement boundaries are considered up to date. This sets out that boundaries have been updated as part of the plan process and this is also set out in response to Question 2 C of the CLAs' response to the inspectors Questions ([CLA03](#)). Those settlements for which a defined boundary

exists are included within the Policies Map and are considered to be appropriately drawn. Any smaller rural settlements for which a defined boundary does not exist are not mapped.

## **2.6 What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?**

There are currently no requirements for Neighbourhood Plans across the plan area to identify new development opportunities to support the CLLP. The only Neighbourhood Plan to have included allocations is Broughton. That plan was made in 2019, and the allocations have since been delivered.

SS3 Strategic Site Allocation for North West Preston/Bartle falls within the parish boundaries of Woodplumpton and Broughton. This incorporates the existing North West Preston Allocation MD2 from the Preston Local Plan. Whilst this development falls within two Neighbourhood Plan areas (Woodplumpton and Broughton), each made plan refers to the role of the Local Plan for delivery of these allocations, they do not form allocations in any Neighbourhood Plan.

## **2.7 Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?**

The Councils consider SS1 and SS2 to be sound and do not propose any further modifications to these policies. The policies are considered sufficiently flexible to allow sustainable development to come forward over the plan period. The plan identifies sufficient opportunities for new development to come forward, meeting the requirements for both housing and employment needs over the plan period.

Whilst the CLA's acknowledge representations received at Regulation 19 suggesting changes to the settlement tiers and including reference to allowing development in Grey Belt, the CLA's do not believe these changes are required in order to make the Plan sound and consider the spatial strategy and settlement hierarchy allow sufficient flexibility for development to come forward over the plan period.