Matter 2, Issue 3 – Whether the Spatial Strategy and overarching policies for growth and change are justified, effective, consistent with national policy and positively prepared?

Q3. f) Does Policy 2 limit development to within defined built-up area boundaries and secondary settlement boundaries? Is this approach consistent with paragraph 4.31 of the Plan which refers to "limited development" outside these locations? Is it clear what is meant by "limited development"?

Response:

These 2 statements are contradictory. Policy 2 limits development to within BUABs whereas paragraph 4.31 allows for development outside of these boundaries.

By including ST01 and ST02 HDC has ignored its own policy of restricting growth to within BUABs. Both sites are outside the BUAB, in the countryside and in the case of ST01 within the Green Gap protected by the Neighbourhood Plan.

Q4. Is Strategic Policy 3: Settlement Expansion sound?

a) Is it consistent with other policies in the Plan?

b) Is it justified and effective in terms of the approach to development outside of built-up area boundaries, secondary settlement boundaries or sites allocated in the Plan?

c) Does this policy apply to all settlement types identified in Strategic Policy 2?

d) Is it clear how a decision maker should react to the term "defensible boundary"?

e) Does criterion 6 unnecessarily duplicate other policy requirements and is it necessary to reference any other specific development constraints such as those related to transport or the natural environment?

f) Is the geographical application of this policy on the Policies Map effective?

Response:

Policy 3 clearly contradicts Policy 2.

There is no definition of a "defensible boundary"?

It does not make any mention of preventing coalescence between settlements as per Policy 15. ST01 does not comply with either of these policies.

Q.6. Should the role of Neighbourhood Plans be more clearly articulated in Strategic Policies 2 and 3 or their justification text in the interests of effectiveness?

Response:

Neighbourhood Plans have been completely disregarded throughout.