

## Warwick District Local Plan – Revised Deposit Version

### Topic Response Analysis

#### Topic: Chapter 8 - Introduction to Rural Area Policies

##### Summary of matters raised in objections.

1. Suggestion that a sentence be included in paragraph 8.1 stating that some greenfield development may assist in reducing car travel to work and, therefore, provide an environmental benefit. *191/RAX Robin Richmond; 195/RAY Leamington Society; 349/RAX Mr D G Goodyear*

##### Response of Head of Planning & Engineering to matters raised

1. The Council does not accept the need for the release of greenfield sites in the rural area for housing development except for development of affordable housing under Policy RAP5. This is because government policy in PPG3, sub-regional policy in the Warwickshire Structure Plan (Policies GD.3 and 5, and H.1) and regional policy in the West Midlands RSS (Policy CF2) provide for the development of sites on previously developed land before the consideration of greenfield sites. There is an adequate supply of previously developed land in the urban areas. Further, the Council does not accept that the development of some greenfield sites will assist in reducing car travel to work as the majority of employers are located in the urban areas. Consideration must also be given to access to shops, schools and other services as well as to jobs.

##### Recommended revision(s)

1. No change required.

#### Topic: RAP1 Development within Rural Areas

##### Summary of matters raised in objections.

1. Paragraph 8.7 should state that Parish Plans should be independently monitored and open to public scrutiny.  
*115/RAA Alan Roberts; 148/RAY Campaign to Protect Rural England*
2. The policy is unnecessary  
*119/RAL Bloor Homes; 120/RAD Miller Homes (West Midlands); 214/RAZ Janet Biles; 322/RAL J G Land and Estates*
3. Paragraph 8.7 should include statement that development will be allowed if it reduces car travel to work  
*195/RAZ Leamington Society; 191/RAY Mr R A Richmond; 349/RAY Mr D G Goodyear*

4. The rural area policies for development are based on flawed housing figures  
*227/RAB David Wilson Homes (E Midlands) Ltd*
5. The commentary to the policy should recognise the importance of employment opportunities in the rural area  
*321/RAR West Midlands International Airport Ltd*

**Response of Head of Planning & Engineering to matters raised**

1. Parish Plans and Appraisals will be taken into account as supporting information when considering development proposals and as such will be examined by Officers for their soundness in the same way as other supporting information. They are not statutory documents and will not form part of the statutory development plan and as such do not need to undergo public scrutiny.
2. The purpose of the policy and the reasoned justification is to make it clear that development will only be permitted in the rural area in the circumstances outlined in this chapter of the plan where it can be demonstrated that the development meets the needs of the local population or supports local communities. It also outlines the way in which agricultural development will be considered.
3. The Local Plan's strategy for housing in the rural area is one which limits new housing to the minimum required to meet local need. This strategy is in accordance with Structure Plan policy which directs most new development to towns with a population of 8,000 or more. These locations offer better access to services, jobs and public transport, thus reducing the need to use the private car. The proposal suggested by the objector would be particularly difficult to implement in practice and does not take into account the need to access schools, shops and other services.
4. The Council accepts that government advice regarding the interpretation of the RSS figures has changed since the Revised Deposit Version was agreed by the Council. The Council will recommend to the Inspector that revised figures are incorporated into the Plan. However the revised figures still show a significant over supply of housing in the District and in no way alter the Plan's strategy for housing development.
5. The Structure Plan directs most new development to towns with a population of 8,000 or more. These locations offer better access to services, jobs and public transport, thus reducing the need to use the private car. The Plan recognises the importance of balancing homes with jobs in the rural area by supporting small scale rural enterprises and farm diversification schemes.

**Recommended revision(s)**

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change

## Topic: RAP2 Directing New Housing

### Summary of matters raised in objections.

1. New development should be confined to isolated or small groups of houses.  
*115/RAB Alan Roberts; 148/RAM Campaign to Protect Rural England*
2. Affordable housing should not be built at the expense of other considerations such as conservation issues  
*115/RAB Alan Roberts; 148/RAM Campaign to Protect Rural England*
3. Policy is too restrictive and should allow for new housing on previously developed land within the prescribed settlement boundaries of existing villages  
*119/RAM Bloor Homes; 120/RAC Miller Homes (West Midlands); 135/RAC Bishops Tachbrook Parish Council; 214/RAA Janet Biles; 239/RAC Mr David Austin; 322/RAM J G Land & Estates*
4. Local need results from demographic considerations and should not be determined by the local community  
*120/RAC Miller Homes (West Midlands); 239/RAC Mr David Austin*
5. Development of new housing should be restricted to that which meets a requirement originating from a Parish Plan or Appraisal.  
*135/RAC Bishops Tachbrook Parish Council*
6. The policy should make reference to Policy RAP4.  
*135/RAC Bishops Tachbrook Parish Council*
7. Sub-section d) i. should not allow for the conversion of properties “adjacent” to villages. Conversions should only be permitted within the existing village envelopes which should be clearly defined.  
*148/RAM Campaign to Protect Rural England*
8. Policy should include an additional criterion which would allow for new housing where the applicant can demonstrate that the development would reduce car travel to work.  
*191/RAZ Mr R.A. Richmond; 195/RBA Leamington Society; 349/RAA Mr D G Goodyear*
9. Paragraph 8.10 should include an acknowledgement that the policy of directing growth to urban areas may starve rural areas of developer contributions for affordable housing  
*191/RAZ R.A. Richmond; 195/RBA Leamington Society; 349/RAA Mr D G Goodyear*
10. There should be further reference in the Plan to “community proposals or assessments”, sub clause III is unintelligible and references to other policies should be deleted.  
*222/RAE Mr J Burman*
11. The land adjacent to the Plough Inn, Eathorpe should be included within a village

envelope  
237/RAA Mr Richard Reeve

12. Market housing should not be dependant upon a needs assessment carried out by the community since this is not subject to public consultation or rigorous scrutiny in the same way as a local plan.  
*256/RAB T & N Ltd (In Administration)*
13. The requirement for market housing to be identified in an appraisal or assessment is unnecessarily restrictive, particularly in the case of mixed use schemes.  
*289/RAB Taylor Woodrow*
14. The policy should recognise the opportunities that may exist in Limited Growth Villages for mixed use schemes including market and affordable housing and village scale employment.  
*289/RAB Taylor Woodrow*
15. Residential moorings can act as a form of sustainable residential development in non-urban, rural and green belt areas.  
*294/RAC British Waterways*
16. The policy fails to allow the wishes of the community to be heard and should include a statement to the effect that residential development should be allowed if approved by the majority of the community in order to sustain or enhance the majority of the village.  
*339/RAA Malcolm D Hawkesford*
17. The policy should allow for market housing on greenfield land where the need has been demonstrated but where there is an insufficient supply of previously developed land.  
*342/RAC Pamela A Smith*
18. Policy should allow for affordable housing on "other suitable land" if previously developed land is not available.  
*346/RAB J M Glenn*

#### **Response of Head of Planning & Engineering to matters raised**

1. The restrictive requirements of the policy will ensure that only small groups of houses will be developed. In particular, the policy states that development should:
  - be located within the boundary of a limited growth village
  - be located on previously developed land
  - in the case of market housing, meet a specific local need as identified by the local community, or
  - provide affordable housing.Since the boundaries of the limited growth villages are drawn tightly around the existing built up areas, there is limited potential for large groups of dwellings.

Housing Needs Appraisals would only identify a limited amount of need due to the size of the Limited Growth Villages in terms of population. It would not be possible, therefore, to justify more than a small group of houses under this policy.

2. All the relevant policies of the local plan will be taken into account when determining planning applications for any form of development.
3. Structure Plan Policy GD.3 allows for *most* new development to be directed to towns. It defines *most* housing as being the migration component of the housing requirement plus a proportion of the natural increase element based on the proportion of population residing in towns in 1991. Using this methodology, the natural increase component of the housing requirement equates to 2,800 dwellings between 1996 and 2011 with 2,380 being directed towards towns and the remaining 420 to serve the needs of the rural area. However by 2005, 1,113 dwellings had already been built in the rural area. The Local Plan, therefore, seeks to restrict development in the rural area to housing to meet local needs for either affordable housing, for which there is an acute need, or for market housing in the limited growth villages. The Structure Plan allows for development in the rural area to be directed according to a hierarchy of settlements where the level of growth is related to the level of services. The Plan identifies Limited Growth Villages in the hierarchy as being settlements with a basic level of services and therefore capable of accommodating limited new housing. Elsewhere, villages outside the hierarchy will be able to accommodate affordable housing to meet their specific needs. However the Plan considers that it would be inappropriate to allow market housing in villages other than the limited growth villages because housing in the rural areas has already been provided for to a greater extent than planned for in the Structure Plan.  
The Structure Plan does, however, allow for development in all settlements, regardless of whether or not they fall within the hierarchy, to satisfy local needs as identified within a community appraisal or assessment. However, it states that this may be “limited by the local plan if this is considered appropriate” (paragraph 3.3.2).
4. Structure Plan policy RA.3 (c) states that development in rural areas should “meet local needs as identified by the community in an appraisal or assessment set in the context of the local plan process.”
5. The Plan allows for affordable housing in the Limited Growth Villages to meet the needs of the rural area generally because these villages have a basic level of services to provide a reasonable quality of life to all sectors of the community. Further, there is a shortage of affordable housing in the rural areas. Thus the local plan does not require that need will have to be demonstrated in an appraisal or assessment. However, in the case of market housing the local plan requires need to be demonstrated because it is not considered that there is a shortage of market housing in the rural area. In fact, there has been a greater level of development of market housing in the rural area than anticipated by the Structure Plan as outlined in 3. above.
6. Reference to RAP4 (Replacement Dwellings) could be added to the policy as an additional criterion.

7. The policy for conversions of existing buildings in the rural area reflects government policy in Planning Policy Statement 7 (Sustainable Development in Rural Areas) which states in paragraph 18 that : "Local planning authorities should be particularly supportive of the re-use of existing buildings that are adjacent or closely related to country towns and villages, for economic or community uses, or to provide housing in accordance with the policies in PPG3, and subject to the policies in paragraph 7 of this PPS in relation to the retention of local services"
8. The Local Plan's strategy for housing in the rural area is one which limits new housing to the minimum required to meet local need. This strategy is outlined in 3. above and is in accordance with Structure Plan policy. The proposal as suggested by the objector would be particularly difficult to implement and is unnecessary in the light of the restrictive nature of the policy for housing in the rural area. Further, there are numerous opportunities for the development of sustainable sites in the urban areas where the need for car travel would be reduced.
9. Structure Plan Policy GD.3 directs most new development to urban areas with a population of over 8,000. It is not a role of the Plan to comment on the effects of this policy on developer contributions in the rural area.
10. Policy RAP2 refers to village appraisals or assessments. These are referred to in paragraphs 8.7 and 8.12. Section III of the policy is a sub section of criterion d) and should be read in conjunction with this. Policy RAP2 aims to bring together all the circumstances where development will be allowed.
11. Eathorpe does not contain the services which are considered essential for a sustainable development location. It has not, therefore, been identified as a Limited Growth Village where some residential development may be appropriate. For this reason a village boundary is not considered to be necessary.
12. The policy accords with the Warwickshire Structure Plan which states in Policy RA.3 (c) that development in rural areas should "meet local needs as identified by the community in an appraisal or assessment set in the context of the local plan process." This means that although a local needs assessment should be undertaken to demonstrate need, this will not necessarily mean that development will take place. Any planning proposal for new housing would need to accord with the policies in the Local Plan and would be decided in the usual way
13. The policy accords with the Warwickshire Structure Plan which states in Policy RA.3 (c) that development in rural areas should "meet local needs as identified by the community in an appraisal or assessment set in the context of the local plan process." Housing development in mixed use schemes is treated in the same way as all other housing proposals
14. The Warwickshire Structure Plan in Policy GD. 3 directs most new development to towns of over 8,000 people and in rural areas development should be to meet local needs only. The Council would not preclude mixed use development where local needs have been identified and are met by the proposals.

15. The Council does not consider that residential moorings in the open countryside represent a sustainable form of development due to the distance which would need to be traveled to access essential services including shops, schools and public transport.
16. The policy allows for residential development where it meets a local need as identified by the community. However, the way in which applications for development are determined by the Council is the same throughout the District – members of the public are given the opportunity to make representations on the proposals but the final decision is that of the District Council.
17. The national and sub-regional planning framework does not provide for the release of greenfield sites in the rural area other than for “exception housing”. Structure Plan Policy GD5 (Development Location Priorities) states that “where there are no appropriate sources of previously developed land and buildings, or where they have become exhausted, local plans should then provide for the release of greenfield sites that meet the criteria of this policy.” The criteria within the policy are, firstly, locations within existing towns of 8,000 or more people; secondly, identified broad locations which are outside of Warwick District and, thirdly, locations adjacent to existing towns of 8,000 people which meet certain other criteria. Further, in relation to windfall sites, government guidance in Planning Policy Guidance 3 (Housing) states in paragraph 36 that “no allowance should be made for greenfield windfalls (except for rural exception sites)” Rural exception sites are dealt with in Policy RAP5.
18. Policy RAP5 allows for affordable housing on land which would otherwise not normally be appropriate for housing development.

**Recommended revision(s)**

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change
6. Add an additional criterion to the policy as follows:  
“e) It is a replacement dwelling in accordance with Policy RAP4 “
7. No Change
8. No Change
9. No Change
10. No Change
11. No Change
12. No Change
13. No Change
14. No Change
15. No Change
16. No Change
17. No Change
18. No Change

**Topic: RAP3 Extensions to Dwellings**

**Summary of matters raised in objections.**

There were no objections to this policy at Revised Deposit Stage

**Response of Head of Planning & Engineering to matters raised**

**Recommended revision(s)**

**Topic: RAP4 Replacement Dwellings**

**Summary of matters raised in objections.**

1. Replacement buildings should be treated as new buildings and the opportunity taken to enhance the landscape by less intrusive design.  
*115/RAC Alan Roberts; 148/RAZ Campaign to Protect Rural England*

**Response of Head of Planning & Engineering to matters raised**

1. Government guidance in Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7) makes a distinction between replacement buildings and new dwellings (paras 19-20). This is because the principle of development has already been established. Paragraph 8.29 of the Plan makes it clear that in determining applications for replacement dwellings, particular regard will be had to retaining and enhancing the character of the rural area.

**Recommended revision(s)**

1. No Change

**Topic: RAP5 Providing Rural Affordable Housing**

**Summary of matters raised in objections.**

1. Parish Plans/ evidence of local need should be independently monitored or endorsed by elected representatives  
*115/RAD Alan Roberts; 331/RAB Gregory Dyson*

2. Rural exception housing should only be allowed in situations where the development

accords with Green Belt policy; should be integrated within the village and be built in single numbers only

*115/RAD Alan Roberts*

3. Only dwellings which are rented in perpetuity should be allowed under this policy

*115/RAD Alan Roberts*

4. The policy is contrary to the West Midlands Spatial Strategy in that it only allows for affordable housing in the rural areas

*119/RAN Bloor Homes Ltd; 120/RAB Miller Homes (West Midlands); 214/RAN Mrs J Biles; 322/RAN JG Land & Estates*

5. The requirement for detailed permissions only is unreasonable

*119/RAN Bloor Homes Ltd; 120/RAB Miller Homes (West Midlands); 214/RAN Mrs J Biles; 322/RAN JG Land & Estates*

6. Rural affordable housing should be restricted to previously developed land within village envelopes

*135/RAD Bishops Tachbrook Parish Council*

#### **Response of Head of Planning & Engineering to matters raised**

1. Paragraph 8.35 requires that the housing needs survey accompanies the details of the proposal and that it meets certain requirements. The survey will, therefore, be considered by the Council alongside the planning application.

2. Green Belt policy would only allow housing in locations where it is within a village which has been identified for limited housing growth within the Local Plan's rural settlement policy. In the case of this Local Plan, this would mean villages identified in Policy RAP2. The purpose of Policy RAP 5 is to allow for small affordable housing developments in, or adjacent to, villages where local plan policy would not normally allow for new housing. This accords with government policy in Planning Policy Guidance 3 Housing (PPG3). The update of PPG3 paragraph 18 states that "affordable housing provision in rural areas should be supported by a rural exception site policy. Rural exception sites should be small, solely for affordable housing and on land within, or adjoining, existing small rural communities which would not otherwise be released for general market housing."

3. Sub-section c) III of the policy only allows for housing other than social rented housing where it "achieves weekly outgoings significantly below the maximum affordable to households in housing need". In practice this is particularly hard to achieve since the current such cost would be in the region of £90,000 which is significantly below the market price of housing in the rural area. Hence, where rural affordable housing is provided for sale, there would inevitably be an element of subsidy so that the cost of the housing would be discounted. Government policy in PPG3 Annex B (updated) states in paragraph 4 that rural exception sites are not appropriate for general market housing or market housing for local needs only. With regard to affordability in perpetuity, the Policy RAP5 states in sub section c) IV that the housing should be available, both initially and for subsequent occupancy, only to those with a demonstrable housing need. Paragraph 8.36 (as changed in the Revised Deposit Version) states that the Council will seek to enter into a Section 106 Agreement to ensure that the housing is affordable in perpetuity.

4. Policy RAP5 is a rural exception policy which allows rural affordable housing in circumstances where land would not normally be released for housing. This accords with government policy in Planning Policy Guidance 3 (PPG3). The update of PPG3 paragraph 18 states that “affordable housing provision in rural areas should be supported by a rural exception site policy. Rural exception sites should be small, solely for affordable housing and on land within, or adjoining, existing small rural communities which would not otherwise be released for general market housing.” Policy RAP2 allows for limited market housing in the Limited Growth Villages where an assessment or appraisal, carried out by the community, provides evidence of local need. This accords with Policy CF2 (sub section D) of the West Midlands Spatial Strategy.
5. The requirement for detailed applications only for exception site proposals is justified because the development relates to a specific local need which may disappear over time. An outline permission would not be appropriate in these circumstances as it would have a potential life of 5 years (with the Reserved Matters) and would not state the sizes and types of dwellings which is essential in order to ensure the development meets an identified need.
6. Government policy in Planning Policy Guidance 3 Housing (PPG3) states in the updated paragraph 18 that “affordable housing provision in rural areas should be supported by a rural exception site policy. Rural exception sites should be small, solely for affordable housing and on land within, or adjoining, existing small rural communities which would not otherwise be released for general market housing.”

**Recommended revision(s)**

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change
6. No Change

**Topic: RAP6 Housing for Rural Workers**

**Summary of matters raised in objections.**

1. The requirements to permit development should be stricter in order to ensure sustainability and the size of the dwelling should relate to the needs of the business rather than residential concerns.  
*115/RAE Alan Roberts*

**Response of Head of Planning & Engineering to matters raised**

1. I consider that the policy criteria for the development of rural workers’ dwellings are sufficiently strict to ensure that only bona fide worker’s dwellings will be built in the open countryside. The policy requires evidence of functional need for the dwelling;

evidence that the business is financially sound (having been operational for at least 3 years and profitable for one of those) and evidence that the occupier is fully or primarily employed on the land to which the dwelling relates. This reflects government guidance in Annex A of Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7). The policy currently states in sub-section d) that the size of the dwelling will be determined by the “commensurate need” for it. This could be amended to make it clearer that the size of the dwelling is commensurate with the “established functional requirement”. This would accord with paragraph 9 of Annex A in PPS7.

**Recommended revision(s)**

1. In sub-section d) of the policy delete “the need for it” and insert “the established functional requirement”

**Topic: RAP7 Directing New Employment**

**Summary of matters raised in objections.**

1. The policy should reflect objectors proposed addition in policy SSP1 of former Alvis test track site for employment use  
321/RAS West Midlands International Airport

**Response of Head of Planning & Engineering to matters raised**

1. I do not accept that the site should be included and therefore will not be adding the proposed additional wording

**Recommended revision(s)**

1. No change

**Topic: RAP8 Converting Rural Buildings**

**Summary of matters raised in objections.**

1. The protection given to bats is welcomed, but this should be extended to include barn owls (WCC – 150/RAC).
2. Criterion 4 should be amended to refer to not altering the external appearance of any listed or traditional building and that any proposal should fit into the existing building as opposed to altering it to suit needs (Alan Roberts - 115/RAF).

### **Response of Head of Planning & Engineering to matters raised**

1. I agree that it appropriate protection should also be given to all relevant species. This will include Barn Owls however may also include other species.
2. I consider that the existing criterion (d) does already adequately deal with these issues. There is a balance to be struck between retaining and respecting the special qualities of traditional rural buildings and finding a new use for them. The existing criterion seeks to do this and has the support of English Heritage.

### **Recommended revision(s)**

1. Amend para. 8.57a to state: “.....Rural buildings may contain bats **and barn owls**. Bats are protected under European and British law. Applicants are advised to check for the presence of bats **and barn owls** and seek professional advice to ensure that their proposals safeguard **these species** using the site.”
2. No change required.

## **Topic: RAP8a Replacement of Rural Buildings**

### **Summary of matters raised in objections.**

1. Policy RAP8a is too restrictive, especially in the Green Belt, and not supportive of the agricultural sector.  
*52/RAD Barford, Sherbourne & Wasperton Joint Parish Council*
2. Objects to final sentence of policy which states that replacement rural buildings will not be appropriate development in the Green Belt  
*154/RAE National farmer's Union*
3. Policy should include an additional criterion which protects existing historic buildings  
*302/RAE English Heritage*

### **Response of Head of Planning & Engineering to matters raised**

1. The policy reflects government guidance in Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7) which states in paragraphs 19 and 20 that local planning authorities should set out the criteria in their plans that will apply to the replacement of countryside buildings. However this guidance in PPS7 does not overrule government policy for the Green Belt which is set out in Planning Policy Guidance 2: Green Belts (PPG2). PPG2 defines development which is appropriate in the Green Belt and this does not include the replacement of non-residential buildings (paragraphs 3.4-3.6). Agricultural buildings which are required for the purposes of supporting farm activities are normally subject to permitted development rights and these are not affected by Green Belt policy, or indeed, Policy RAP8a.
2. See 1 above.

3. Existing Listed Buildings would be protected by Policy DAP6 of the Plan. There is a case, however, for protecting other traditional rural buildings from replacement.

**Recommended revision(s)**

1. No Change
2. No Change
3. Add a new criterion as follows:  
“ d) the replacement would not result in the loss of a building which displays the special qualities of a traditional rural building “

**Topic: RAP 9 – Farm Diversification**

**Summary of matters raised in objections.**

1. Policy should be deleted on the grounds that permitting non-agricultural development in rural areas conflicts with policies to protect the rural landscape and promote sustainability and transport objectives (James Mackay 199/RAJ).

**Response of Head of Planning & Engineering to matters raised**

1. This policy is consistent with government guidance set out in paragraph 30 of PPS7 which recognises that diversification into non-agricultural activities can be vital to the success of farm enterprises. Local authorities are encouraged to be supportive of well conceived schemes which contribute to sustainability objectives and are consistent in scale and nature to the rural location. Along with other policies in the plan (see para 8.62) RAP9 seeks to ensure that farm diversification proposals are consistent with this guidance.

**Recommended revision (s)**

1. No change required.

**Topic: RAP10 Safeguarding Rural Roads – No objections received**

**Topic: RAP 11 Rural Shops and Services.**

**Summary of matters raised in objections.**

1. It is considered that this policy should be carefully worded to ensure that there is no misinterpretation of what is meant by 'local retail or service needs'. *ref 350 /RBK Tesco Stores Ltd.*

**Response of Head of Planning & Engineering to matters raised**

1. This policy is within the rural areas chapter and is targeted at rural shops and services. In particular it is specifically intended to ensure that existing facilities are not lost unless a range of tests can be satisfied (criteria a-c of the Policy). I consider that it is clear that the local needs in this instance relate to the immediate requirements of rural settlements; however this could perhaps be clarified by the addition of further wording to paragraph 8.66.

**Recommended revision (s)**

1. Para 8.66 – change third sentence to read as follows “A settlement can be of any size, however, proposals will need to demonstrate that they are serving a local need ( ***usually the immediate requirements of the settlement*** ) and this will be more difficult in the case of facilities within very small communities”.

**Topic: RAP12 Farm Shops – No objections received.**

**Topic: RAP13 – Directing New Outdoor Leisure and Recreation Development**

**Summary of matters raised in objections.**

1. Objects to the statement that large scale marinas are more likely to be appropriate in urban areas. Mooring facilities should be acceptable in appropriate locations (British Waterways ref: 294 RAD).

**Response of Head of Planning & Engineering to matters raised**

1. It is the intention of the local plan to direct new leisure facilities to the most sustainable locations which in most cases will be urban areas. It is recognised that the nature and demand of certain facilities such as marinas may mean that these are better suited to less central locations and as such these proposals would be considered on individual merit. Criteria a) allows for major outdoor leisure and recreation developments in rural locations where it can be

demonstrated that the use cannot operate effectively in an urban location and they are or can be made highly accessible by walking cycling and public transport.

**Recommended revision (s)**

1. No changes required.

**Topic: RAP14 Golf Facilities – No objections received.**

**Topic: RAP15 Camping and Caravanning Sites – No objections received.**

**Topic: RAP16 Directing New Visitor Accommodation – No objections received.**

**Topic: Chapter 8 Omissions – No objections received.**