

Issue 2	Strategy	
Development plan reference:	2.4 – Strategy, page 19-21 4.3.17 – Reducing the Need to Travel, page 65	Reporter: David Buylla
Body or person(s) submitting a representation raising the issue (including reference number):		
Alison Bowman (00194) Alan Crombie (00288) Scottish Power (00455) Portmoak Community Council (00638) ABO Wind UK Ltd (00812) Councillor Michael Barnacle (02633) Friends of Rural Kinross-shire (05105) Persimmon Homes East Scotland (09004/15) Taylor Wimpey UK Ltd (09004/27) Jim Pritchard (09104)		J W Farquharson/G D Strawson (09117) SSE plc (09311) Steve Sayers (09520) A & J Stephen Limited (09727) G S Brown Construction Ltd (09817) Alistair Godfrey (09941) Stewart Milne Homes (10080) George Pease (10115) Homes for Scotland (10214) David Wilson Homes (10227) John Munro (10277)
Provision of the development plan to which the issue relates:	LDP Strategy	
Planning authority's summary of the representation(s):		
<p><u>Overall Strategy</u></p> <p>Alison Bowman (00194/1/001): Need to think beyond economics when considering where development land of any description should be. The quality of land in terms of food production, forestry or use to nature needs to be taken into account. There needs to be a balance between all uses, and looking at development in isolation will lead to squandering natural resources.</p> <p>George Pease (10115/1/001); Friends of Rural Kinross-shire (05105/1/004): Arable land is a precious resource for food production and there is insufficient recognition in the LDP of the need to protect it.</p> <p>Councillor Michael Barnacle (02633/1/001): The MIR (Core_Doc_095) should have stated as a significant core value the need to protect prime agricultural land and our scenic landscape against inappropriate development but the LDP does not adequately respond to this.</p> <p>John Munro (10277/1/013): Given that sustainable development is partly based on the natural environment of the area it is surprising the draft strategy pays limited regard to this. There is little reference to landscape/ecology/biodiversity/local climate etc which should be key factors in determining land uses and development densities. The proposed urban form does little to relate to these. The right approach would be to 'design with nature'.</p> <p>Portmoak Community Council (00638/1/004): Support the Plan as written.</p>		

Sustainable Economic Growth

Alan Crombie (00288/1/001): Migration to/from Perth & Kinross (and thus demand for housing) is affected by the level of employment and pay on offer in the area. Pay in Highland Perthshire is well below the Scottish and UK averages due to the seasonal nature of many jobs and the relatively high level of unemployment both registered and 'hidden'. LDP needs to address the generation of full-time permanent year round employment.

John Munro (10277/1/003): The proposed strategy for the Perth Area lacks clear rationale. It is unclear how it will further sustainable development in its environmental, social and economic aspects given that the 2006 Planning Act (Core_Doc_148) states that such involves the environmental, economic and social aspects so extends to key issues of climate change, energy scarcity and an ageing population.

Homes for Scotland (10214/1/008): Support the Plan as written.

Demographic Change

David Wilson Homes (10227/1/001); G S Brown Construction Ltd (09817/3/006); Taylor Wimpey UK Ltd (09004/27/001); A & J Stephen Ltd (09727/5/001); Persimmon Homes East Scotland (09004/15/001); Homes for Scotland (10214/1/009): Object to the use of the 2006 General Register Office for Scotland (GROS) projections (Core_Doc_013). The LDP should instead be based on the 2008 GROS projections (Core_Doc_134) for some or all of the following reasons: to ensure a lack of effective housing land does not become a constraint should the market improve; the 2006 figures are out of date, this is a weakness of the strategic requirement proposed in TAYplan identified by the Reporter examining that Plan – DPEA have requested TAYplan to consider implications of using 2008 GROS projections (DPEA request re policy 5 and TAYplan response (S4_Doc_070)); planning for growth does not automatically mean it will happen but a message can be sent to the house building industry that Perth and Kinross is open for business; the population is naturally growing and there is scope to increase the strategic housing requirements to encourage development and growth particularly in established settlements; TAYplans's use of the 2006 GROS projections seeks to impose on the ability of LDPs to properly plan for their areas; proper use of the 2008 GROS projections would not result in sites coming forward which undermine the delivery of the TAYplan strategy rather it would set a suitably ambitious target and allow for a generous and effective land supply in line with Scottish Government's aims including those in Scottish Governments Firm Foundations Report (Core_Doc_101) and National Planning Framework 2 (Core_Doc_020); increasing housing numbers could have environmental impacts but the LDP is required to consider such impacts; the housing land requirement should be based on the most up to date projections available; 2008 GROS projections should have been considered as an alternative growth scenario in the MIR (Core_Doc_095) in line with Circular 1/09 (Core_Doc_001); and the Council assume immigration will be curtailed due to lack of mortgage funding but acknowledge that one of the largest groups of incomers are older people looking to retire who generally have more equity.

Councillor Michael Barnacle (02633/1/002); Jim Pritchard (09104/1/002); Steve Sayers (09520/1/002); Alistair Godfrey (09941/1/001): Object to the use of the 2006 GROS projections (Core_Doc_013). The LDP should instead be based on lower growth projections for some or all of the following reasons: the growth rate poses serious demographic challenges and is neither desirable nor sustainable from an environmental perspective; the Single Outcome Agreement (Core_Doc_100) is predicated on being proactive within the growth agenda in order to achieve the concept of a Greater Perth and

City status but this is now confirmed so such a growth level no longer needed; bad planning to base assumptions about future growth on outdated figures; figures are inappropriate because they are underpinned by high economic growth and in-migration assumptions which no longer apply; growth assumptions are not properly supported by evidence – population growth in Kinross-shire does not follow normal statistical growth due to the lack of significant local employment meaning young people move away but growth can come from additional housing being made available to people moving into the areas for amenity and value concerns; and TAYplan and the growth figures contained within it have not been approved by Scottish Ministers – TAYplan's adoption of Scottish Government growth projection is admitted to be constrained by current economic difficulties and SPP paragraph 15 (S4_Doc_314) requires development plans to be aspirational but realistic.

Alistair Godfrey (09941/1/001): LDP should identify the realistic needs to be met within the Plan period taking into account wider economic trends, ability of the local economy to sustain development and using the housing strategy (it is assumed this refers to the Council's Local Housing Strategy) to identify need and demand as per SPP paragraph 69 (S4_Doc_315) and the Housing (Scotland) Act 2001 (it is assumed this refers to Part 5 Section 89 of the Act (S4_Doc_603)). There is little in the LDP to show how economic growth will be achieved and no detail to show how the planned economic land will be used, without which there is limited justification for the scale of development proposed. SPP paragraph 5 (S4_Doc_316) requires plans to provide guidance to investors but there is no explicit recognition of this in the LDP.

Jim Pritchard (09104/1/003): There is no evidence for the reference in LDP paragraph 2.4.7 that '*the inherent demand for housing both in terms of need and aspirations remains largely intact*'.

John Munro (10277/1/011): The rapidly aging population will pose huge problems for the Council yet its implications seem not be fully recognised in the LDP. Contributing to housing shortages is a lack of small homes with easy reach of facilities which would suit elderly people. This leads to under-occupation of family homes. By providing attractive alternatives locally these households may be willing to move to places where they can easily access facilities without having to use a car.

Economic Downturn

Homes for Scotland (10214/1/010): Paragraph 2.4.8 should be replaced by the Main Issues Report paragraph 3.2.12 (S4_Doc_222) as it underpins the whole argument for planning effectively for growth. Using up to date projections is crucial. Planning for growth does not mean it will happen but message can be sent that Perth and Kinross Council is open for business and initiatives aimed at stimulating the housing sector can be targeted with LDP support.

Stewart Milne Homes (10080/15/001): The perceived impact on the market of the lack of mortgage finance and the inability of the housing building industry to access development finance are not planning issues that should be materially taken account of in plan preparation and are not supported by fact.

Climate Change

SSE plc (09311/1/010): LDP should recognise the benefits and contribution that renewable energy generation can make to tackling the onset of climate change.

Scottish Power (00455/1/001): LDP should make a specific link between the role of renewable energy generation in mitigating climate change and renewable energy generation targets.

ABO Wind UK Ltd (00812/2/001): Concerned that the focus on tackling climate change does not address the economic and social benefits which renewable energy developments or low carbon technologies can contribute to the economy. Renewable energy developments can encourage investment and business opportunities in the region, make positive environmental enhancements, and contribute to the key challenge of achieving sustainable economic growth.

Jim Pritchard (09104/1/004): Supports the Plan as written.

Transport

J W Farquharson/G D Strawson (09117/1/001 & 09117/3/001): The Plan should focus development next to existing and potential new public transport routes/nodes such as railway stations. There is no reference to this in the strategy section (2.4.10 - 2.4.14) or to reducing the use of private cars and encouraging the use of public transport/maximising accessibility to public transport routes.

Modifications sought by those submitting representations:

Overall Strategy

Alison Bowman (00194/1/001): There needs to be a balance between all land uses rather than looking at development land in isolation. No specific modification is suggested.

George Pease (10115/1/001): Protection of arable land should have a much more prominent place in the overall Plan strategy.

Friends of Rural Kinross-shire (05105/1/004): There should be an absolute embargo on development on arable ground.

Councillor Michael Barnacle (02633/1/001): Protection of prime agricultural land and scenic landscape against inappropriate development should be a core value of the LDP.

John Munro (10277/1/013): Draft strategy should pay more regard to the natural environment but no specific modification is suggested.

Sustainable Economic Growth

Alan Crombie (00288/1/001): LDP needs to address the generation of full-time permanent year round employment but no specific modification is suggested.

John Munro (10277/1/003): No specific modification sought but is implied that there is a need for greater clarity on or explanation of the approach to sustainable development and how this will incorporate the key issues of climate change, energy scarcity and an ageing population and factors relating to these issues.

Demographic Change

David Wilson Homes (10227/1/001); G S Brown Construction Ltd (09817/3/006); Homes for Scotland (10214/1/009): LDP should use 2008 GROS projections (Core_Doc_134).

Taylor Wimpey UK Ltd (09004/27/001); Persimmon Homes East Scotland (09004/15/001): LDP Demographic Change paragraphs 2.4.4 and 2.4.5 should be

amended to reflect at least the 2008-based population and household projection (2008 GROS) (Core_Doc_134).

A & J Stephen Ltd (09727/5/001): No specific modification sought other than LDP should be encouraged to meeting identified land requirements. Implied that 2008-base GROS projections (Core_Doc_134) should be used.

Councillor Michael Barnacle (02633/1/002); Steve Sayers (09520/1/002): No specific modification sought other than LDP should be based on lower growth rates.

Jim Pritchard (09104/1/002): No specific modification sought other than population projections on which LDP is based should be revised downwards.

Alistair Godfrey (09941/1/001): No specific modifications sought but implied that LDP should adopt lower growth projections based on the housing needs identified in the housing strategy (it is assumed this refers to the Council's Local Housing Strategy) and taking account of wider economic trends and the ability of the local economy to sustain development.

Jim Pritchard (09104/1/003): No specific modification sought other than the LDP's assumption of housing need and aspiration should be justified.

John Munro (10277/1/011): No specific modification sought other than the LDP needs to fully recognise the implications of the rapidly aging population and needs to encourage the provision of more small houses.

Economic Downturn

Homes for Scotland (10214/1/010): Paragraph 2.4.8 should be replaced by the Main Issues Report paragraph 3.2.12 (S4_Doc_222): *'The land use planning system has to be prepared to respond to any economic upturn and ensure that the lack of effective housing land does not become a constraint on general economic recovery. Should the planning system be unable to respond to economic recovery through a lack of identified effective housing land supply, there would be pressure to release housing land through ad-hoc decisions. This presents the possibility that the decision making process would respond primarily to the housing land shortage at the expense of longer term sustainability issues. This would also defeat one of the primary aims of the new planning system to be planned'.*

Stewart Milne Homes (10080/15/001): References to the economic downturn should be removed from the LDP.

Climate Change

SSE plc (09311/1/010): LDP should specifically recognise the benefits and contribution that renewable energy generation can make to tackling the onset of climate change within the introductory chapters to the Plan.

Scottish Power (00455/1/001): LDP should make a specific link between the role of renewable energy generation in mitigating climate change and renewable energy targets.

ABO Wind UK Ltd (00812/2/001): No specific modification sought but is implied that LDP paragraphs 2.4.9 and 2.4.10 should better emphasise the role that renewable energy development plays in not just tackling climate change but also its social and economic benefits.

Transport

J W Farquharson/G D Strawson (09117/1/001 & 09117/3/001): Reference should be added to LDP paragraph 4.3.17 to encouraging growth at public transport nodes. References should be added to paragraphs 2.4.10 and 2.4.12-2.4.14 to public transport.

Summary of responses (including reasons) by planning authority:Overall Strategy

Alison Bowman (00194/1/001): The LDP was informed by the SEA (Core_Doc_087 and Core_Doc_089). The purpose of SEA is to give prominence to environmental considerations in land allocation decisions. In this respect it is not considered that the LDP does look at development land in isolation as suggested.

No modification is proposed to the Plan.

George Pease (10115/1/001); Councillor Michael Barnacle (02633/1/001): It is considered that the protection of prime agricultural land and the scenic landscape are already core values of the LDP reflected in the key objectives under Place and also implicit in the vision statement which requires the area to be developed in such a way so as not to place an unsustainable burden on future generations. Both soil and landscape are topics considered through the SEA page 9 (S4_Doc_604) and have therefore been taken into account in the preparation of the LDP. Furthermore LDP Policy ER5 (S4_Doc_506) protects prime agricultural land and Policy ER6 (S4_Doc_397) requires development proposals to conserve and enhance the landscape qualities of Perth and Kinross. It is not therefore considered necessary to further emphasise these issues in the LDP strategy section.

No modification is proposed to the Plan.

Friends of Rural Kinross-shire (05105/1/004): LDP Policy ER5 (S4_Doc_506) protects prime agricultural land and presumes against development on such land except in specific limited circumstances. There is a limited supply of vacant brownfield land within Perth and Kinross, as demonstrated in the Scottish Vacant and Derelict Land Survey return 2011 (S4_Doc_606), therefore it is not considered practical to place an absolute embargo on the development of arable land but instead to strictly control and limit the instances where prime agricultural land can be developed as described in policy ER5.

No modification is proposed to the Plan.

John Munro (10277/1/013): The factors mentioned: landscape, ecology, biodiversity and local climate all feature in the LDP key objectives (S4_Doc_422) and have been taken into account in the preparation of the LDP through the SEA process (pages 31-35) (S4_Doc_605).

No modification is proposed to the Plan.

Sustainable Economic Growth

Alan Crombie (00288/1/001): LDP is a land use plan so can only allocate sites for employment uses, seek to ensure the maintenance of a continuous supply of developable economic development land, and adopt policies which encourage the development of such uses. In the view of the Council the LDP strategy, policies and site allocations provide a framework to facilitate sustainable economic growth. Whilst the Council may have a role in stimulating growth this is not a land use issue and is better

covered in other policy documents.

No modification is proposed to the Plan.

John Munro (10277/1/003): Refer to diagram at LDP paragraph 2.4.2 - this diagrammatic approach is considered a good way of illustrating the LDP's approach to sustainable economic development. Furthermore the factors mentioned have also been taken account in the preparation of the LDP through the SEA process (Core_Doc_087 and Core_Doc_089).

No modification is proposed to the Plan.

Demographic Change

David Wilson Homes (10227/1/001); G S Brown Construction Ltd (09817/3/006); Taylor Wimpey UK Ltd (09004/27/001); A & J Stephen Ltd (09727/5/001); Persimmon Homes East Scotland (09004/15/001); Homes for Scotland (10214/1/009): The housing land requirement is set out in the Strategic Development Plan in line with SPP paragraph 72 (S4_Doc_317). The TAYplan MIR pages 15-18 (S4_Doc_607) considered the appropriate alternative projections in advance of preparing the proposed TAYplan. The increase of the housing land requirement to reflect the 2008-based GROS projections was considered at the TAYplan examination. The inquiry report concluded that there was no clear evidence which could reasonably lead the Reporter to conclude that the regional build rate provided for in the proposed Strategic Development Plan was either inappropriate or insufficient. To the contrary the Reporter found that the parameters set in TAYplan ought to enable LDPs to allocate a generous supply of housing land. The Reporter further recognised that should growth rates exceed projections there is a commitment to review TAYplan by 2017. No change was therefore made to TAYplan policy 5 (S4_Doc_062) to amend the housing land requirement (TAYplan examination report page 220 paragraph 15) (S4_Doc_597). The LDP must be consistent with the Strategic Development Plan therefore it is not appropriate to amend the LDP housing land requirement to reflect the 2008-based GROS projections.

No modification is proposed to the Plan.

Councillor Michael Barnacle (02633/1/002); Jim Pritchard (09104/1/002); Steve Sayers (09520/1/002); Alistair Godfrey (09941/1/001): The housing land requirement for all housing market areas is set out in the Strategic Development Plan in line with SPP paragraph 72 (S4_Doc_317). A decrease in the housing land requirement was considered at the TAYplan examination. As discussed above the Reporter found the proposed regional build rate to be sufficient and appropriate. The Reporter further considered that a reduction in build rates would not provide for a generous supply of land for housing which would in turn be inconsistent with SPP (TAYplan examination report page 221 paragraph 17) (S4_Doc_598). No change was therefore made to TAYplan policy 5 (S4_Doc_062) to amend the housing land requirement (TAYplan examination report page 220 paragraph 15) (S4_Doc_597). The LDP must be consistent with the Strategic Development Plan therefore it is not appropriate to base the LDP housing land requirement on lower growth rates.

No modification is proposed to the Plan.

Jim Pritchard (09104/1/003); Alistair Godfrey (09941/1/001): The housing land requirement is set out in the Strategic Development Plan. This was informed by the TAYplan Housing Needs and Demand Assessment (Core_Doc_190) which was carried

out in accordance with the Scottish Government's HNDA Guidance and confirmed as robust and credible by the Scottish Government Housing and Regeneration Directorate (Scottish Government Housing Needs & Demand Assessment letter) (Core_Doc_608). The HNDA findings confirm a continuing demand for housing in Perth and Kinross. It is not therefore considered necessary or appropriate to include further details in the LDP.

No modification is proposed to the Plan.

John Munro (10277/1/011): LDP paragraph 2.4.4 recognises that meeting the needs of a growing and changing population is one of the many challenges to be faced. Household size is an issue which is continuing to be researched and quantified in conjunction with the Council's Housing Service through both the TAYplan and Perth & Kinross Council's own Housing Needs and Demand Assessments. However whilst the LDP can, through suggested density ranges, encourage the provision of more small houses it is ultimately a land use plan and cannot therefore dictate the size of houses to be built on a site. Furthermore good placemaking principles dictate that mixed communities catering for all needs are appropriate on larger sites and this is further addressed through the masterplanning process taking account of local needs.

No modification is proposed to the Plan.

Economic Downturn

Homes for Scotland (10214/1/010): The issue raised is considered to be adequately summarised in LDP paragraph 2.4.8.

No modification is proposed to the Plan. However if the Reporter is so minded to recommend that the proposed modification is adopted, the local authority would be comfortable with this modification as it would not have any implications for any other aspect of the Plan.

Stewart Milne Homes (10080/15/001): This is background information which it is felt relevant to include to help set the context in terms of explaining why it is still necessary to plan for growth in light of the current economic downturn.

No modification is proposed to the Plan.

Climate Change

SSE plc (09311/1/010); Scottish Power (00455/1/001); ABO Wind UK Ltd (00812/2/001): Whilst the economic, and in some cases social, benefits of renewable energy development are acknowledged it is not the role of the LDP to promote certain types of development but rather to support and enable appropriate development in the right locations. Support for renewable and low carbon sources of energy is considered to be covered by LDP policy ER1 (S4_Doc_392).

No modification is proposed to the Plan. However if the Reporter is so minded to recommend that the proposed modifications are adopted, the local authority would be comfortable with this as it would not have any implications for any other aspect of the Plan.

Transport

J W Farquharson/G D Strawson (09117/1/001 and 09117/3/001): The aim of the LDP is to produce a settlement pattern which reduces the need to travel. This is highlighted in

the key objectives under place (S4_Doc_422) which include the need to produce a more efficient settlement pattern by ensuring the location of new development contributes to reducing the need to travel. Also in the spatial strategy section at paragraphs 4.3.16 - 4.3.17 (S4_Doc_505) which identify the need to reduce travel by private car, to ensure most growth takes place in or close to existing settlements, and to locate major expansion areas where improvements to public transport can be delivered. Given that the focus is on ultimately reducing the need to travel overall it is considered that the issue of locating new development near to existing public transport routes and nodes is most appropriately addressed in LDP policy e.g. Policy TA1B (S4_Doc_387) which requires new development proposals to be well served by and easily accessible to all modes of transport in particular more sustainable modes including public transport. It is not therefore considered necessary to amend the strategy paragraphs of the LDP.

No modification is proposed to the Plan.

Reporter's conclusions:

Overall Strategy

1. The Proposed Plan's Vision Statement recognises at paragraph 2.2.4 that rural spaces are the source of food and other raw materials, and it is proposed to protect prime quality agricultural land under Policy ER5. However, the absence of any reference in the plan's strategy to the resource production importance of agricultural land is an omission that should be addressed in order to provide context and justification for Policy ER5.
2. The Strategic Environmental Assessment (SEA) process has ensured that environmental considerations such as landscape, ecology, biodiversity and climate change have been taken into account in developing the Proposed Plan's strategy. The need to balance economic growth with environmental protection is set out in paragraph 2.4.3 as one of the challenges for the plan's strategy and there would be no benefit to the clarity of this statement in listing specific environmental considerations.

Sustainable Economic Growth

3. In seeking to achieve sustainable economic growth, the proposed strategy identifies the need to balance a number of economic, social and environmental issues. Job creation is one important economic and social objective, which is adequately dealt with in the proposed strategy. While it might be desirable if there were increased opportunities for permanent, year-round employment as opposed to lower-paid, seasonal jobs, there is no convincing evidence before this examination that this is a particular issue that requires to be addressed or that the planning system, through the proposed local development plan, is the appropriate vehicle for its achievement.

Demographic Change

4. The proposed plan must be consistent with TAYplan, which sets out housing targets that are informed by the 2006 General Register Office for Scotland (GROS) projections. Even if there were convincing evidence that the 2006 projections are unrealistic, which there is not, it would be inappropriate for the proposed plan to seek to revisit this issue, either by adopting the higher growth projections that were forecast in the 2008 GROS projections or by adopting lower growth aspirations than have been set at strategic development plan level. This matter is discussed in more detail under Issue 20c Housing Land Strategy.

5. The strategy does not explicitly highlight the effects of an ageing population as an issue for the plan to address. As this is a significant matter, which the planning system has a role in addressing, it would be beneficial for the strategy to refer briefly to it.

Economic Downturn

6. It is accepted that, for the sake of clarity, paragraph 2.4.8 should be replaced with paragraph 3.2.12 in the Main Issues Report, which far more clearly explains why the Proposed Plan should allocate sites that are capable of responding to any upturn in development activity.

Climate Change

7. The plan's strategy highlights the importance of mitigating climate change and of other environmental, economic and social issues, with which renewable energy proposals are likely to assist. However, the proposed strategy does not focus on individual development types. Rather, it identifies issues, which are likely to be important over the plan period and which require to be addressed in the plan's policies and proposals. It would be inappropriate to single-out within the strategy, the role of renewable energy generation and it is more appropriate to deal with this in Policy ER1, which is the policy that deals specifically with this development type.

10. The potential for energy scarcity has implications for the planning system. Scottish Planning Policy identifies the importance of energy efficiency and of developing more secure and diverse energy supplies. It would therefore be appropriate for the Proposed Plan's strategy to refer to this issue.

Transport

10. The Proposed Plan's spatial strategy sets out at paragraph 4.3.17 a series of objectives that aim to reduce the need to travel including a requirement to ensure that most growth is encouraged to take place in or close to existing settlements. There is no need for reference to be made in the earlier strategy section of the plan, as the reference within the spatial strategy adequately addresses the point and is the more appropriate location for what is a spatial consideration.

Reporter's recommendations:

1. Add a new paragraph 2.4.15 under the subheading "Use of resources" to read as follows:

"Use of resources

2.4.15 Agricultural land provides an important role in food and other resource production. The quality of such land is graded according to its value, and that which is recognised to be of the highest quality requires to be protected from redevelopment unless there is no alternative."

2. Add a new paragraph 2.4.16 under the new "Use of resources" subheading to read as follows:

"2.4.16 In order to address potential energy scarcity issues in the future, development needs to be located and designed in a way that maximises energy efficiency. The benefit

of development which delivers more secure and diverse energy supplies will also need to be recognised.”

3. Add to the end of paragraph 2.4.6 the following sentence:

“The projected increase in the average age of our population will require new homes and services to be appropriately located and will have implications for the design of new development.”

4. Replace paragraph 2.4.8 with paragraph 3.2.12 from the Main Issues Report, which reads as follows:

“The land use planning system has to be prepared to respond to any economic upturn and ensure that the lack of effective housing land does not become a constraint on general economic recovery. Should the planning system be unable to respond to economic recovery through a lack of identified effective housing land supply, there would be pressure to release housing land through ad-hoc decisions. This presents the possibility that the decision making process would respond primarily to the housing land shortage at the expense of longer term sustainability issues. This would also defeat one of the primary aims of the new planning system to be plan-led.”