Dover District
Local Plan

Issue 1 – Dover, Deal and Sandwich Town Centres – Policies SP8, SP9 and SP10

Q1	**What are the Opportunity Areas, how were they defined and is their inclusion in the Plan justified?**

Q1 DDC Response:

1. As set out in Policy SP8, the opportunity areas are sites within and adjoining the Dover town centre boundary which provide the opportunity for mixed-use development in the town centre that will contribute to the overall vibrancy of the town centre. The sites have been identified through a review of the town centre sites assessed as part of the HELAA and other sites known to the Council where there is significant development potential.

2. The opportunity sites located within the town centre boundary are:

   - Maison Dieu Road car park and college campus – this forms part of the Mid Town allocation (SAP6), and as set out in response to Matter 3, the car park is the main potential area available for potential development.
   - Stembrook car park together with an adjacent recently cleared site
   - Bench Street site allocation (SAP8)

3. These sites are all in majority ownership of the Council following land assembly, and the Council is currently considering options for bringing them forward for development. They have been identified as opportunity areas to provide policy support for their development but retain an element of flexibility. Two of the sites – Dover Mid Town and Bench Street have site specific allocations which are identified to meet specific development needs set out in the Local Plan, including housing.
4. The Opportunity Areas adjacent the town centre boundary are:

   - Former leisure centre site to the east, a cleared vacant site
   - Cambridge Road to the south which forms part of the wider Dover Waterfront allocation. Cambridge Road is an area where improved pedestrian links between the town centre, via the Bench Street allocation and subway, and the seafront and Western Docks area are being investigated.

Dover District Local Plan

Q2 What effect will the Whitfield Urban Expansion have on the town centres of Dover, Deal and Sandwich (if any)? How has this been considered?

Q2 DDC Response:

5. The Whitfield Urban Expansion will provide shopping facilities to meet the day to day needs of existing and future residents. The expansion is expected to have a positive effect on Dover town centre by expanding the number of customers in the immediate catchment area with Fastrack providing a dedicated public transport link. The expansion scheme is also expected to have a positive impact on Deal and Sandwich town centres by increasing the number of visitors for leisure purposes and to use speciality business serving a wider catchment area.

6. The impact on Dover town centre was considered through the existing allocation of the site in the Core Strategy[1]. Paragraph 4.55 identified the site's development to create an expanded community having an important relationship with Dover town stating that:

   'Development of the site must create an expanded settlement at Whitfield that is complementary to the town centre rather than one in competition. One of the reasons for seeking population growth at Dover is to help support an improved range of facilities at the town centre. It is therefore of great importance that the expansion of Whitfield is only supported by social infrastructure, shopping and leisure facilities that are necessary for the local community and not to serve the wider needs of Dover. In addition, residents at Whitfield must be able to access the town centre easily, especially by public transport, to encourage use of Dover town centre rather than competitor centres outside the District'

7. These requirements follow through into the existing SPD[2] with provision identified for one main village centre where the focus for community, commercial and other facilities will be located (para 5.5 and 5.155). The outline planning consent for this element has been granted (Phase 1a) and includes 1,975 sqm of A1, A2 and A3 uses, alongside community uses of a doctor's surgery and community and learning campus. The SPD also envisages that each neighbourhood would have a neighbourhood centre, with the focus being on community and commercial uses at the neighbourhood level (para 5.6). A local centre of up to 250sqm of A1-A3 uses, located adjacent to the new primary school, has been approved to form part of the first neighbourhood of 1,250 dwellings (DOV/10/01010).

8. Policy SAP1 at criterion b) continues with this approach, with the local and neighbourhood centres to include 'small scale local shopping facilities'.

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[1] Adopted Core Strategy 2010 (dover.gov.uk)
[2] GBD05 Whitfield Urban Expansion Supplementary Planning Document (2011)

Q3 Where are the anticipated needs for retail, leisure, office and other main town centre uses set out? Is the information on future needs based on appropriate and up-to-date evidence?

Q4 Does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead, as required by paragraph 86 of the Framework?

Q3 and Q4 DDC Response:

9. The anticipated needs for retail, commercial leisure and other main town centre uses are set out in preceding paragraphs 3.135-3.139 to Policy SP7: Retail and Town Centres. The information on future needs is based on the Retail and Town Centre Needs Assessments (RTCNA July 2018 EEB04e[3] and the October 2021 update EEB04a-d[4], paragraphs 5.13-15 and 6.21).

10. The NPPF states that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area (paragraph 11). The framework requires strategic policies to look ahead over a minimum 10-year period from adoption (paragraphs 20 and 86) and be underpinned by relevant and up-to-date evidence (paragraph 31). The criteria that local authorities should consider when preparing planning policies include: (a) defining a network and hierarchy of centres; (b) defining the extent of town centres and Primary Shopping Areas (PSAs); (c) retaining and enhancing existing markets; and (d) allocating a range of suitable sites in town centres to meet the scale and type of development likely to be needed. Paragraphs 87-91 specifically set out the requirement to apply the sequential and impact tests to determine applications for new retail, leisure and main town centres that are neither in an existing centre, nor in accordance with an up-to-date development plan.

11. The RTCNA (2021) provided an update on the quantitative need for new retail (comparison and convenience goods) and leisure floorspace in the Dover District and its centres over the period to 2040. The findings updated the results of the 2018 RTCNA for the retail and leisure sector. The report also provided an analysis of the impact of the pandemic and the possible implications of planning changes, such as use class and permitted development rights changes. The capacity assessment update was underpinned by robust evidence and forecasts (paragraph 7.2), including:

[3] EEB04e Retail and Town Centre Needs Assessment (2018)
[4] EEB04a RTCNA Retail and Leisure Needs Assessment (2021), EEB04b RTCNA Town Centre Shopping Patterns and Healthchecks (2021), EEB04c RTCNA Policy and Strategy Recommendations (2021), EEB04d RTCNA Appendices on Quantitative Outputs (2021)

- the latest ONS-based population projections for the Study Area and study zones.

- the most recent base year estimates for convenience and comparison goods expenditure (2019 prices) by zone as derived from Experian.

- the latest forecast growth rates for retail expenditure, Special Forms of Trading (SFT) and floorspace 'productivity' informed by the latest Retail Planner Briefing Note published by Experian Business Strategies (EBS);

- the estimated turnover of all commitments in the District.

12. The RTCNA 2021[5] analysis showed that there was no capacity for new retail (convenience and comparison goods) floorspace over the period to 2040 (Tables 7.1 and 7.2) taking into account known commitments. Whilst no capacity was identified for new convenience goods floorspace in Dover town centre, out-of-centre locations or local and village centres, capacity for 256 sqm net of superstore format floorspace to 458 sqm net of supermarket/discounter format floorspace was identified for Deal and Sandwich town centres by 2040. The modest amount of space could be accommodated through changes of use, extensions to existing stores or infill development.

13. The RTCNA 2021 review of the commercial leisure sector focused on updating the quantitative need for new food and beverage provision, cinema screens, health and fitness facilities and hotels:

    - Food and beverage provision - There was the prospect of growth based on demand across the food and beverage sector with potential for approximately 22 outlets by 2040. The RTCNA recommended that any forecast need should be directed to the town centres first to help increase competition and consumer choice and to underpin the daytime and evening economies. In most cases the forecast needs and any market demand from operators would likely be satisfied by the take-up of suitable vacant units in existing centres, the re-purposing of floorspace and/or as part of mixed-use developments (para 3.139 of Plan).

    - Cinema screens – There was no forecast capacity for additional screens identified in the RTCNA 2021 update to 2040. The District has benefitted from investment in a six-screen multiplex that opened as part of the St. James development in Dover town centre in 2018.

    - Health and fitness facilities - Since the 2018 RTCNA[6], the District has benefited from the new £26m Dover District Leisure Centre that opened 2019. New provision in Dover town centre was created in 2018 by a commercial operator at

[5] EEB04a RTCNA Retail and Leisure Needs Assessment (2021)
[6] EEB04e Retail and Town Centre Needs Assessment (2018)

the St. James Retail and Leisure Park. Improvements to the leisure centre in Deal are also being reviewed at the time of writing. Projections used by the RTCNA 2021 demonstrated that there would be insufficient support for further provision based on the average membership levels required by key premium or budget gym operators.

- Hotels - Dover's strategic location and connectivity is considered the main economic driver for the district. The Kent Accommodation Study (2020)[7] identified priority gaps:

  - 4 Star hotels with 100+ rooms – aspiration for 5* in the future.
  - Hotels to accommodate meetings, incentives, conferences and exhibitions (MICE) particularly in Dover, and mixed-use sites (e.g. Discovery Park, Dover Waterfront);
  - Spa hotel accommodation; and
  - Executive "glamping" / high end boutique hotels (coastal and rural)

14. The identified gaps have partly been addressed through new provision of a budget hotel opening at Discovery Park, in 2021. Planning permission was granted in 2021 for a motel at Marina Curve as part of Dover Waterfront and for the expansion of the Dover Marina Hotel into adjoining buildings in 2023. There is outline planning permission for another hotel at Discovery Park and there are other proposals emerging across the District. A number of areas have been identified in the Plan for new hotel provision, including specific allocations at Dover Waterfront (Policy SAP3) and broad support for new hotel provision as a 'main town centre use' in the three town centres (Policy SP8, SP9 and SP10) of the District, supplemented by additional sites or expansion opportunities being progressed by developers or existing operators. Policy E4 provides positive support for hotel proposals across the District.

Conclusion

15. Modest capacity for new retail floorspace has been identified for Deal and Sandwich town centres which could be accommodated through changes of use, extensions to existing stores or infill development.

16. Growth in the leisure sector is anticipated for food and beverage uses and hotel accommodation. In most cases the forecast needs for food and beverage uses and any market demand from operators would likely be satisfied by the take-up of suitable vacant units in existing centres, the re-purposing of floorspace and/or as part of mixed-use developments. The identified gaps in visitor accommodation have partly been addressed through new provision and planning permissions and there are other proposals at the planning application stage or at the concept stage as part of mixed-use regeneration proposals, including on allocated sites.

[7] Kent Accommodation Study – Dover Dashboard (2020)

Q5	**Are the development requirements for non-town centre uses sufficiently clear? Are they effective?**

Q5 DDC Response:

17. Policies SP8, 9 and 10 as currently drafted would in principle permit non-town centre uses such as light industry/general industry/R&D and community uses within the town centres. This is partly due to the broad range of uses which are now included within Class E of the Use Classes Order. Proposals for such uses would need to accord with the criteria in the policies (R1, SP7, SP8, SP9, SP10) alongside other policies in the Plan. Taking this into account, it is considered that some uses that fall within Class E, such as light industry may not be acceptable in the town centres. At present, this would be considered on a case-by-case basis as proposals come forward.

18. The Council considers this to be sufficiently clear to be effective, however it the Inspectors would like this clarified in supporting text, or the specific Class E uses which are considered to be compatible with the town centre set out in the Policies, the Council would raise no objection to this change being made.

Issue 2 – Primary Shopping Areas and Retail – Policies SP7, R1, R2, R3 and R4

Q1 How have the Primary Shopping Areas for Dover, Deal and Sandwich been determined? Are they justified?

Q2 What is the justification for seeking to reduce the town centre boundaries and consolidate Primary Shopping Areas under Policy SP7? How will this be achieved and what is required from development proposals to meet this requirement?

Q1 and Q2 DDC Response:

19. The NPPF at paragraph 86 requires planning policies to amongst other things, 'define the extent of town centres and primary shopping areas…'

20. Annex 2 to the NPPF defines the Primary Shopping Area (PSA) as an 'area where retail development in concentrated'. The NPPF explains that the town centre is 'an area defined on the local authority's policies map, and includes the PSA and areas predominantly occupied by main town centre uses within or adjacent to the PSA'.

21. The Primary Shopping Areas and boundaries for the three town centres have been developed using evidence from the Retail and Town Centre Needs Assessment studies (RTCNA 2018[8] and RTCNA 2021 Update[9]).

22. A review of town centre boundaries and primary and secondary frontages for Dover, Deal and Sandwich was the focus for the RTCNA 2018 (as those were the requirements of national policy at the time). The study also concluded that the PSAs generally comprised the primary shopping frontages (PSFs) and those secondary shopping frontages (SSFs) which were 'adjoining and closely related to the PSF' (paragraph 12.4). The assessment took account of national planning policy and recent reforms, national retail and town centre trends and District retail catchment and shopping patterns. The assessment also included town centre health checks, retail and leisure need assessments.

23. The extent of the PSAs and town centre boundaries were initially set out for consultation in the draft Local Plan (Regulation 18), drawing on the evidence, key findings and recommendations in the RTCNA 2018. The Regulation 18 boundaries and the findings from the RTCNA (2018) were reviewed again as part of the RTCNA (2021 update), which also took into account the change in national policy removing the requirements to identify secondary shopping frontages.

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[8] EEB04e Retail and Town Centre Needs Assessment (2018)
[9] EEB04c RTCNA Policy and Strategy Recommendations (2021)

Dover Town Centre

24. The RTCNA 2018[10] recommended the inclusion of the DDC leisure centre site (now former site) into the town centre boundary and that the shopping frontage designation for the St. James development be reassessed due to its expected contribution to the critical mass of retail uses within the centre. The town boundary for the Regulation18 consultation excluded Snargate Street and all areas to the south of the A20, including the Dover waterfront sites and the Camden Crescent car park. The suggested extension to include the DDC leisure centre had not been taken forward. The RTCNA 2021[11] review of the Regulation 18 draft Plan boundaries found that the PSA boundary broadly followed the main concentration of retail provision and had been extended southwards to include the St. James Retail and Leisure Park.

25. Data from Experian GOAD was reviewed as part of the RTCNA (2021) and indicated that approximately 65 units were vacant in Dover Town Centre, equivalent to a vacancy level of almost 19% and 5% above the national average. The high level of vacant units was indication of overprovision requiring a review of the town centre boundary and the retail core area. The compaction of the town centre boundary was recommended, as it would enable DDC to capitalise on town centre focused initiatives, such as mixed-use development, that could take place in and adjacent to the centre and thereby enhance its vitality and viability. With the high vacancy rates, the reoccupation of vacant floorspace was the priority. The combined transformation of the town centre and Waterfront provided an opportunity to create a destination point to retain and enhance expenditure and a complementary offer to enhance visitation, footfall, and linkages.

Deal Town Centre

26. The RTCNA (2018) recommended two potential options for Deal town centre boundaries. The Council adopted the recommendation to extend the secondary frontage northwards to New Street on the eastern side of the High Street, that formed part of both options, with the inclusion of St. Georges Church. The Council also supported the inclusion of Deal Town Hall and Union Road car park.

27. The RTCNA (2021) noted that Deal had a vacancy rate of 4.1% compared to 5.8% in 2018.

28. The RTCNA 2021 review of the Regulation 18 draft Plan boundaries for Deal (paragraphs 2.21 to 2.22) found that previously excluded concentrations of retail units had been added to increase the PSA northwards. The town centre boundary had been extended westwards to incorporate Stanhope Road due to the mix of town centre uses that included several houses. The assessment recommended that the town centre boundary was consolidated further to the north of the PSA to align more closely with the commercial provision.

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[10] EEB04e Retail and Town Centre Needs Assessment (2018)
[11] EEB04a RTCNA Retail and Leisure Needs Assessment (2021)

29. Following these recommendations, the town centre boundary for the Plan was revised to exclude the dwellings towards the western end of Stanhope Road and those behind the commercial frontage on the eastern side of High Street, from Market Street northwards.

Sandwich Town Centre

30. The focus for Sandwich town centre at the Regulation 18 stage was to capitalise on tourism expenditure associated with the town's heritage including the medieval street pattern and listed buildings and on its golfing identity. The 2021 review noted that the vacancy rate for Sandwich had increased from 5.4% to 13.5%. The review found that the PSA boundary broadly followed the main concentration of retail provision. No changes to the RTCNA (2018)[12] town centre or PSA boundaries, as incorporated in the Regulation 18 plan, were recommended.

Conclusion

31. The strategy set out in SP7 was based on the findings from the two RTCNAs and seeks to reflect changing retail habits, resulting in a reduced requirement for retail floorspace and the need to create a focussed retail core, together with the need to improve viability and vitality through a more flexible approach to specific uses within and adjacent the retail cores.

32. The town centre boundaries and primary shopping areas are based upon evidence set out in the RTCNAs carried out in 2018 and 2021[13], following the relevant policy guidance at the time, as summarised above. On this basis they are justified.

33. Delivery of the proposed strategy to reduce the town centre boundaries and consolidate the primary shopping areas, will be delivered through the requirements of Policies SP6, 7, 8 and R1 which set out which uses will be allowed in which areas. This will be delivered through gradual and incremental change as development proposals come forward.

[12] EEB04e Retail and Town Centre Needs Assessment (2018)
[13] EEB04a RTCNA Retail and Leisure Needs Assessment (2021)

Q3	**What is the justification for identifying opportunities for residential development on the edges of town centres, but not within them?**

Q3 DDC Response:

34. Overarching policies regarding residential uses in town centres are set out in Policy SP7 (Retail and Town centres) and Policy R1 (Primary Shopping Areas). Policy SP7 states that residential provision in and on the edge of town centres is part of the Council's strategy for retail and town centres. Policy R1 states that the Council will support proposals to bring upper floors back into use, including for residential use. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas. This is to stop the fragmenting of retail and commercial uses, to maintain a vital and viable commercial core to the towns. Residential uses are however supported on the ground floor in the wider town centre areas are set out in Policies SP7, SP8, SP9 and SP10, supported by Policy R1.

35. In Dover town centre, opportunities for residential development have been identified in the Mid-town (SAP 6), Bench Street (SAP 7) and Stembrook mixed use opportunity areas and more generally via the second paragraph of Policy SP8. Residential development would be supported at first floor level or above in the PSA (SP8 paragraph 2) and in the wider town centre (SP8 paragraph 3).

36. In Deal and Sandwich town centres, residential uses are also encouraged within the town centres (Policy SP9 criteria 1 and Policy SP10 criteria 1). In relation to the primary shopping areas, the policies cross refer to Policy R1 which supports residential uses on the upper floors in the primary shopping areas only.

Q4	**What are the reasons for the suggested changes to Policy SP7? Why are they necessary for soundness?**

Q4 DDC Response:

37. AM16 of SDO6 sets out three changes to Policy SP7, as follows.

38. The additional text at the end of the second paragraph seeks to ensure that proposals to diversify the provision of facilities in district and local/village centres will need to reflect the individual distinctive character of the centre as well as being of an appropriate scale. The Council do not consider that the change is necessary for soundness.

39. The town centre and primary shopping area boundaries have been amended following reviews conducted as part of the RTCNA reports and stages of plan preparation and consultation, as set out in response to Issue 2 Question 2. The proposed modification to criterion 2 clarifies the wording to explain the strategy, but it not considered necessary for soundness.

40. The additional wording to Criterion 7 emphasises the importance of heritage assets to the quality of the District's town centre environments and is considered to be necessary for the policy to be effective, so that it is clear what is expected of development proposals.

Q5 Are the requirements of Policies R1, R2, R3 and R4 consistent with national planning policy concerning the management of main town centre uses?

Q5 DDC Response:

41. The Council's Economic Growth Strategy (2021)[14] and policies in the Plan seek to support the role that the District's main town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Their long-term vitality and viability has been promoted by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses including housing, whilst reflecting their distinctive characters.

42. In accordance with paragraphs 86 a) of the NPPF, Policy R1 sets out the mix of uses that will be acceptable in the primary shopping areas, which is supported by policies for each of the town centres (Policies SP8, 9 and 10) as part of a positive strategy.

43. The RTCNA (2021) demonstrated that no additional sites were required for retail purposes, as future capacity could be accommodated using existing permissions, intensification and vacant units. The identified capacity for food and beverage uses could be met via existing vacant units, the expansion of existing business and mixed-use allocations such as Dover Waterfront. New hotels, including expansions, have been constructed, permitted or are being considered, with the potential for further provision as part of mixed-use site allocations. The Plan recognises that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

44. A network and hierarchy of town centres has been defined in preceding paragraphs 3.128 to 3.130 of Policy SP7. The extent of town centres and primary shopping areas have been reviewed, redefined, and subjected to consultation as part the Regulation 18 Draft Local Plan and the Regulation 19 Submission Local Plan. The boundaries are

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[14] EEB02 Economic Growth Strategy (2021)

referred to in Policy R1 and have been set out in plan form as part of Policies SP8 (Figure 3.2), SP9 (Figure 3.3) and SP10 (Figure 3.4) Policy R1).

45. In accordance with paragraphs 87 and 88 of the NPPF Policy R2 sets out how the Council would apply a sequential test to planning applications, including impact assessments where required, for main town centre uses which are neither in an existing centre nor in accordance with the Plan (Policies SP7 and R2). Policy R2 and the preceding and implementation paragraphs set out the Council's requirements for the Sequential Impact Test based on the NPPF and the recommendations of the RTCNA 2021[15]. In accordance paragraph 90 of the NPPF, Policy R2 also sets out a local threshold for consideration of retail impact assessment of 280sqm. This has been informed by analysis set out in the RTCNA 2021 and is therefore considered to be justified.

46. Policy R3 seeks to protect local shops and supports the provision of new shops in accordance with Paragraphs 92 c) and 93 a) of the NPPF.

47. Policy R4 supports the NPPF requirement for well-designed places, setting out local design principles (para 28), whilst also supporting the character and function of the town centres in maintaining a high standard of design for shopfronts.

48. In summary the Council considers that policies R1, R2, R3, and R4 are consistent with national policy.

[15] EEB04a RTCNA Retail and Leisure Needs Assessment (2021)

Issue 3 – Tourism and Homeworking – Policies E3 and E4

Q1	**How have the effects of the Whitfield Urban Expansion on tourism been considered, in particular the location of touring caravans on Singledge Lane?**

Q1 DDC Response:

49. The effects of the Whitfield Urban Expansion on tourism and the location of touring caravans on Singledge Lane has not been specifically considered through the plan making process. The inclusion of the touring caravan site within the site boundary for the WUE does not imply any intention for its redevelopment, as with existing residential properties within the site boundary as set out in para 4.59 of the Plan. Consideration of the impacts on the touring caravan site will need to be considered at the planning application stage through the requirements of Policy PM1 c) which requires proposals to be compatible with neighbouring buildings and spaces.

Q2	**Is it clear to decision-makers, developers and local communities what is meant by the phrase 'attractive to the market' in Policy E4? Is the policy effective?**

Q2 DDC Response:

50. Policy E4 seeks to support proposals for new tourist accommodation, including visitor attractions and accommodation (both serviced and self-catered). Additionally, at Part 2, the policy seeks to protect existing tourist accommodation because, while the Council will not be likely to receive proposals for the retention of tourist facilities, it will be in a position to grant or refuse permission for the change of use of existing tourist accommodation during the plan period. The phrase "attractive to the market" in that context refers on to the following sentence where the Council requires evidence to demonstrate that the existing tourist use is no longer suitable or viable alongside applications for the change of use of tourist accommodation of 10 or more bedrooms.

51. Further detail is added in the subsequent 'Implementation' text where at paragraph 8.42 it is advised that when considering an application for the loss of existing tourist accommodation, (serviced and non-serviced) an assessment will need to be made as to the viability of the existing use or an alternative use, with robust evidence that the premises has been unsuccessfully marketed for a period of at least 12 months on terms which compare with other similar premises and locations being marketed for similar use(s) provided to the Council. This assessment, the extent of marketing carried out and prevailing market conditions will be material considerations in the Council's assessment of viability evidence, and marketing should also extend to the

potential use for other suitable tourism uses for which the location and premises may be suitable.

52. The policy requirement to demonstrate that a previous use is no longer suitable or viable where the change of use of existing tourist accommodation is proposed is therefore considered effective and the 'Implementation' text provides appropriate further guidance on how the policy will be applied.

Q3	**Does Policy E4 enable sustainable rural tourism and leisure developments as required by paragraph 84 of the Framework?**

Q3 DDC Response:

53. Paragraph 84 of the National Planning Policy Framework (2023)[16] states that planning policies should enable (at criterion a)) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings, and (at criterion c)) sustainable rural tourism and leisure developments which respect the character of the countryside.

54. Policy E4 supports the improvement, upgrading or extension of existing tourist facilities which is consistent with the thrust of the NPPF's aim to sustainably grow those rural businesses related to tourism.

55. Additionally, criteria c) i-x outline how proposals for tourist facilities during the plan period can be enabled while respecting the character of the countryside.

56. The policy is therefore consistent with the NPPF paragraph 84.

[16] National Planning Policy Framework (2023)