



Council's Response to Inspectors' Matters, Issues, Questions

Matter 9 – Place Making

Issue 1 – Achieving High Quality Design and Quality of Development – Policies PM1 and PM2

Issue 1 – Achieving High Quality Design and Quality of Development – Policies PM1 and PM2

Q1 Is Policy SP2 justified, effective and consistent with paragraph 92 of the Framework, which requires planning policies to aim to achieve healthy, inclusive and safe places?

Q1 DDC Response:

1. Yes. Policy SP2 sets out clearly the policy approach of the Plan to support improvements in the health and wellbeing of residents, improve quality of life for all and reduce health inequalities through high quality place making, to ensure the creation of healthy, safe and inclusive communities across the district.
2. Regarding the requirements of Paragraph 92 of the Framework, criteria 3 and 5 of Policy SP2 promote social inclusion, and thereby comply with requirement a of Paragraph 92. Criteria 2, 4 and 9 of Policy SP2 require places to be safe and accessible and thereby comply with requirement b of paragraph 92, and finally criteria 2 and 9 of Policy SP2 enable and support healthy lifestyles, in compliance with requirement c of paragraph 92. It is therefore considered that Policy SP2 is justified, effective and consistent with national policy.

Q2 Is it sufficiently clear to users of the Plan what is meant by 'where relevant and appropriate'? Is Policy PM1 effective?

Q2 DDC Response:

3. The phrase 'where relevant and appropriate' is included here, given the broad range of place making issues addressed by Policy PM1, not all of which will be applicable to every proposal. For example, Part 3b or Part 4b would not apply to applications for infill development of one or two houses, or the expansion of a tourism facility or the provision of an equestrian enterprise.
4. The Plan acknowledges that in the case of proposals for residential extensions and annexes only certain criteria – Part 1, Part 2d and Part 6c - of Policy PM1 apply. These are set out in Policy H6 g.
5. The Council does not consider this issue to be a matter of soundness, but if for clarity the Inspectors consider an amendment to the third sentence of the opening paragraph to Policy PM1 as set out below to be necessary, the Council would raise



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no objection to this Post Submission Modification being made in order to add clarity to the Policy and to users of the Plan.

Policy PM1 Achieving High Quality Design, Place Making and the provision of Design Codes.

All development in the District must achieve a high quality of design, that promotes sustainability, and fosters a positive sense of place, by responding to the following principles in an integrated and coherent way. Development that is not well-designed will not be supported. Where relevant ~~and appropriate~~ to the proposal under consideration, new development must:

6. The Council considers Policy PM1 to be effective. It is deliverable and is rooted in an evidence base that includes national and county-wide design principles, guidance and codes.

Q3 What are the reasons for the suggested changes to Policy PM1? Why are they necessary for soundness?

Q3 DDC Response:

7. As set out within SD06, proposed additional modification AM88 provides clarification as to the requirements for integration with existing transport modes, specifying that development must provide high quality pedestrian and cycle infrastructure (to LTN1/20 Standard¹), including PRoW connections. This modification has been agreed with KCC and National Highways within the Statement of Common Ground (please see Appendix 3 of that Statement). It also corrects the reference in 4e of the Policy from 'swift boxes' to 'swift bricks'.
8. Proposed additional modification AM89 adds additional information to the Implementation section of the supporting text to this Policy at the request of Historic England. It strengthens this section by including a reference to the production of development briefs as an additional layer, which will help ensure heritage is properly understood and celebrated within development sites, and, furthermore, that local character and distinctiveness is properly understood and embedded in the planning for a site. This modification has been agreed with Historic England within the Statement of Common Ground.

¹ Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk)



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9. Whilst these proposed modifications add clarity and provide minor factual updates thereby contributing to the effectiveness of the Policy, the Council does not consider the changes to be necessary for soundness.

Q4 Does Policy PM2 also relate to the standard of living accommodation for potential future occupants? Where/how is this secured?

Q4 DDC Response:

10. PM2 relates to all new-build residential development in the District in seeking to ensure that all new development is of the highest design quality both internally and externally and to provide a healthy living environment that meets the needs of residents. However, it is acknowledged that once dwellings are sold on the open market, the Council has no control over alterations which are permitted development within the General Permitted Development Order (GPDO)(2015). It is therefore important that the Council secures a high quality of residential accommodation from new-build homes including appropriate space standards internally and amenity space externally, light and ventilation and access for wheelchair users.
11. The policy seeks to ensure that residential development meets Nationally Described Space Standards and built in compliance with building regulations part M4(2). There is also a target for building regulations part M4(3) on schemes over 20 dwellings. Such standards would be secured by condition (for the development to be completed in accordance with the approved drawings).

Q5 What is the justification for the use of the Nationally Described Space standards?

Q5 DDC Response:

12. The Council's evidence suggests that most housing built in the District over the last five years has been in accordance with the National Described Space Standards (NDSS), partly due to the fact that the houses coming forward have been primarily three or four-bedroom housing in accordance with the Core Strategy (2010) and partly because developers are now more widely building to the NDSS.
13. However, it is important to note that this trend may change in the future, particularly as the Local Plan supports a more varied housing mix on sites, in addition to higher densities than in the existing stock and the rise in conversions to residential from other uses.



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14. Given this, it is considered justified to require developments to meet the NDSS and this approach is supported by the Whole Plan Viability Study (2020)².

Q6 What is the justification for the thresholds in Policy PM2 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?

Q7 Does Policy PM2 take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, as required by the PPG?

Q8 Does Policy PM2 make the distinction between wheelchair accessible and wheelchair adaptable homes?

Q6, Q7 & Q8 DDC Response:

15. The NPPF (para 130c) states that planning policies and decisions should 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users'. There is an increasing need for accessible and lifetime homes in the District, so that houses meet the needs of residents and can be adapted across their lifetime. Developments therefore need to be designed to be flexible and adaptive in their design to respond to changes in society.
16. The Strategic Housing Market Assessment (SHMA Partial Part 2 Update)(2019)³ indicates that the population aged 65 or over is going to increase significantly in Dover District over the plan period, from 28,409 in 2020 to 43,616 in 2040. The projections also indicate that there will be an increase in the number of households headed by someone over 65 from 18,567 in 2020 to 29,179 in 2040, an increase of 57.1%.
17. As a result of these emerging trends, the SHMA partial update (2019) estimates that by 2040, there will be a need for between 9,813 and 10,878 dwellings built to the lifetime homes standard in the District within the general housing stock. The Council

² GEB08a [Whole Plan Viability Study \(2020\)](#)

³ [HEB01c Dover Strategic Housing Market Assessment Partial Part 2 Update](#)



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therefore requires, at criteria d)i) and d)ii) of PM2, all new development to be designed to Building Regulation optional requirement M4(2) (accessible and adaptable dwellings) standard.

18. In respect of the Building Regulation M4(3) (wheelchair user dwellings) optional requirement, in accordance with planning practice guidance this can only be required on units where the local authority is responsible for allocating or nominating a person to live in that dwelling. Accordingly, criterion PM2 d)ii) requires 5% of units on developments of 20 or more dwellings to be built in compliance with the M4(3) building regulation requirement. This fits within the element of a scheme that would be expected to be provided as social/affordable rent at 16.4% of the overall tenure mix which is needed across the plan period.
19. Evidence from the Council's Housing Department shows a need for 12 M4(3) dwellings and 38 M4(2) dwellings on the housing waiting list. While this suggests that the need for M4(3) dwellings may be greater relative to M4(2) need than the SHMA evidence suggested, given the relatively small total need for M4(3) the Council has opted for the 5% requirement which is considered achievable on sites of over 20 dwellings and is supported by the conclusions of the Whole Plan Viability Study (2020)⁴.
20. Planning Practice Guidance on optional technical standards for wheelchair user housing advises that Local Plan policies should take into account of site-specific factors such as vulnerability to flooding, site topography and other factors which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. PPG states that neither of the optional requirements under part M of the Building Regulations should be applied where step-free access is not viable.
21. The Council's high level of need for lifetime homes clearly justifies the application of the optional technical standards for wheelchair user housing, however it is also acknowledged that the optional technical standards cover a range of factors both inside and outside the home which, as described by PPG, may not be achievable on all sites. Should the Inspector conclude that it is necessary, the Council is therefore minded to agree to a Post Submission Modification to the last sentence of PM2 to add the following sentence:

'Planning applications must be supported with clear information to demonstrate, where relevant, how the above requirements have been met. In circumstances where the optional technical standards M4(2) and M4(3) cannot be met due to site-specific factors as per Planning Practice Guidance, the Council will require robust evidence to justify this as part of a planning application. This change would also be duplicated into all other relevant sections of the Plan.'

[4 GEB08a Whole Plan Viability Study 2020](#)



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22. In addition, the reference to wheelchair accessible homes in parentheses in criterion d) ii) of PM2 could be altered with another Post Submission Modification to '(wheelchair accessible user homes)' as this is how this type of dwelling is referred to in Planning Practice Guidance.
23. The Council considers that these change are necessary for soundness, to ensure the policy accords with national policy terminology.
24. With regards to viability, as set out within GEB08a⁵ the costs of the various housing standards were assessed and factored in to the whole plan viability testing, see paragraphs 8.29 – 8.32 and the baseline and sensitivity testing within the report.

⁵ [GEB08a Whole Plan Viability Study Main Report and Appendices \(doverdistrictlocalplan.co.uk\)](https://www.doverdistrictlocalplan.co.uk)



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Issue 2 – Open Space and Sports Provision – Policies PM3 and PM4

Issue 2 – Open Space and Sports Provision – Policies PM3 and PM4

Q1 How have the requirements in Policies PM3 and PM4 been established as part of the plan-making process? Are they based on robust, up to date evidence?

Q1 DDC Response:

25. Growth expected in the District during the plan period will increase pressure on existing open space and sports resources, therefore it is important to plan positively to meet the additional demand by enhancing existing facilities, or creating new ones, and securing their maintenance in the long term. The NPPF (2021) states that LPAs should base their policies for open spaces and sports facilities on robust and up to date assessments of local needs. Furthermore, these assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space sports and recreational facilities in the local area.

Open Space

26. Accordingly, an Open Space Assessment of all accessible open spaces across the District was undertaken and an Open Space and Play Standards Paper (2019)⁶ has been produced to reflect the assessment findings. The assessment identifies the quality, quantity and accessibility of current provision, produces local provision standard recommendations in accordance with relevant guidance and local needs (as per PM3 part a)), and identifies opportunities to protect and enhance the existing provision.
27. The Open Space Assessment and Play Standards Paper (2019) recommends a minimum area threshold for each typology, which is used to determine if provision should be provided on or off site, and these thresholds have fed through into PM3 at part b).
28. The Open Space and Sport Topic Paper⁷ summarises out the revised evidence base that has been produced by DDC to form the evidence base for the new local plan (Chapter 3). Chapter 4 summarises the key outputs from the evidence, and chapter 7 sets out how the conclusions were used to create the policies. Key outputs included the following:
- KKP advocated the requirement for open space should be based upon the number of persons generated from the net increase in dwellings in the proposed scheme. They also promoted the use of quantity provision standards (in hectares

⁶ [PMEB03b Open Space and Play Standards Paper \(2019\)](#)

⁷ [PMEB01 Open Space and Sport Topic Paper \(2022\)](#)



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per 1,000 population) in calculating the open space requirements of new housing development. This is taken forward in policy PM3 (Para 7.5)

- KKP recommended that the Council use Sport England's Playing Pitch New Development Calculator as a tool for determining developer contributions linking to sites within the locality. This has been taken forward and is included within the Local Plan policy PM4 – (para 7.5)

Indoor and Outdoor Sports

29. For indoor sports, the Indoor Sports Facilities Strategy (2022) provides an audit and assessment of indoor sports facilities and was produced using Sport England guidance and in consultation with local providers and users.
30. For outdoor sports, the Playing Pitch Strategy (2019) provides a strategic framework which ensures that the provision of outdoor playing pitches meets local and community needs for existing and future residents, and visitors to the District. This updated the previous 2015 Dover Playing Pitch Strategy and was developed in accordance with best practice recommendations, Sport England guidance as appropriate and under the direction of a steering group led by the Council and including National Governing Bodies of Sport (NGBs). It was subject to consultation including community consultation, alongside the Regulation 18 Local Plan in early 2021.
31. Findings from both the Indoor Sports Facility Strategy (2022) and Playing Pitch Strategy (2019), and a subsequent review of the outdoor sports and undertaken through the OS topic paper, led to the identification of specific projects in the Infrastructure Delivery Plan (IDP)⁸ and main priorities for provision across the plan period which have been factored into the provisions of PM4.
32. Sport England (SE) made a representation at the Regulation 19 stage advising that no changes are required to the Submission Local Plan at present, however the evidence base needs to be brought up to date. In acknowledgement of this, the Council has subsequently agreed a Statement of Common Ground with SE where it is agreed that the Council will commence a formal review of its Playing Pitch Strategy in 2024 to take account of any changes since the production of the Plan evidence base, in what is an area that naturally evolves over time.
33. The Post Submission Modification proposed to text is:

⁸ [ED7 Infrastructure Delivery Plan – V3 July 2023](#) and [ED7A Appendices to IDP V3 July 2023](#)



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Issue 2 – Open Space and Sports Provision – Policies PM3 and PM4

'6.59 The recommendations and outcomes of these assessments and strategies for sport provision across the district have been included within the Infrastructure Delivery Plan, which will be updated as projects are completed or evidence of use and need changes. It is important to note that during the lifetime of the plan, the supply and demand and future needs for each sport will evolve. The Council intends to commence the formal review to the Playing Pitch Strategy in 2024.'

Q2 Have the requirements been adequately tested to ensure that they are viable and deliverable?

Q2 DDC Response:

34. The emerging requirements of PM3 were tested as part of the Whole Plan Viability Study (2020)⁹ where it was concluded that the Plan overall was achievable, subject to the removal of the requirement to provide affordable housing in the District's lowest value area in Dover Town.
35. The viability position of the Plan was then updated in 2022 by GEB08b¹⁰ which factored all the infrastructure requirements intended to be funded via Section 106 agreements into an assessment including the latest build cost and house price information at that time, also concluding that the Plan's requirements are deliverable subject to the removal of the affordable housing requirement in Dover under SP5. The requirements of PM3 and PM4 have therefore been adequately tested to ensure that they are viable and deliverable.

⁹ GEB08a [Whole Plan Viability Study \(2020\)](#)

¹⁰ GEB08b [Viability Study Update Note \(2022\)](#)



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Issue 3 – Protection of Open Space and Local Green Space – Policy PM5

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Q1 How is open space defined for the purposes of Policy PM5?

Q1 DDC Response:

36. The Council produced an Open Space and Sports Topic Paper (2022)(PMEB01¹¹) which is the Council's key piece of evidence on this topic. PMEBO1 identifies sports and open space projects for the purpose of updating the Infrastructure Delivery Plan, undertakes an assessment of submitted Local Green Space sites and provides factual updates to evidence generated by the earlier Open Space and Playing Pitches reports (PMEB03a¹², PMEBO3b¹³, PMEBO4a¹⁴ and PMEBO4b¹⁵).
37. PMEBO1 at page 5 identifies the categories related to by the terms 'open spaces' and 'sports' but for ease of reference are also provided below. These are the facilities protected by PM5, though it is important to note that many of the open space and sport designations meet more than one of the categories listed. i.e. a recreation ground may include informal open spaces, equipped play areas and various sports pitches which may have ancillary indoor provision such as changing rooms. This is why they have been grouped into one topic paper (PMEBO1) and covered in combined Local Plan policies.
38. Categories of Open Space and Sports Provision/Facilities:

Open Space:

- Formal Parks and Gardens (Strategic areas for informal recreation and community events)
- Natural and Semi-natural Green Spaces (With a biodiversity or environmental conservation)
- Amenity Greenspace (usually smaller informal spaces within residential areas)
- Equipped provision for children and young people (Play areas, MUGAs, Skate parks, Teenage Shelters)
- Recreation grounds (Formal spaces used for sport and/or community/youth provision)

¹¹ [PMEBO1 Open Space and Sport Topic Paper \(2022\)](#)

¹² [PMEBO3a Open Space Assessment Main Report \(2019\)](#)

¹³ [PMEBO3b Open Space and Play Standards Paper \(2019\)](#)

¹⁴ [PMEBO4a Playing Pitch Strategy Assessment Report \(2019\)](#)

¹⁵ [PMEBO4b Playing Pitch Strategy and Action Plan \(2019\)](#)



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Issue 3 – Protection of Open Space and Local Green Space – Policy PM5

- Allotments
- Cemeteries/burial grounds
- Local Green Spaces (formally designated through planning system)

Sports Provision/Facilities:

Outdoor:

- Football (Grass and 3G Pitches)
- Cricket
- Rugby Union
- Hockey
- Tennis
- Bowls
- Athletics
- Netball
- Golf
- Watersports
- Volleyball

Indoor:

- Swimming
- Sports Halls/ general indoor halls
- Health and Fitness/gyms
- Indoor Bowls
- Squash and Racketball
- Indoor Tennis
- Aerobic/Dance Studio
- Gymnastics
- Boxing and Martial Arts



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Issue 3 – Protection of Open Space and Local Green Space – Policy PM5

39. The Open Space evidence led to the identification of **309 sites as open space provision (i.e. from the below typologies), equivalent to over 651 hectares in total.**

Open Space Typology	Primary Purpose
Parks and gardens	Accessible, high quality opportunities for informal recreation and community events.
Natural and semi-natural greenspaces	Wildlife conservation, biodiversity and environmental education and awareness.
Amenity greenspace	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.
Provision for children and young people	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, MUGAs, skateboard areas and teenage shelters.
Allotments	Opportunities for those people who wish to do so to grow their own produce as part of the long term promotion of sustainability, health and social inclusion.

40. A list of protected Open Space sites designated by the Council under PM5 is included at Appendix 4 of PMEB01¹⁶ and covers sites from the above Open Space typologies and sites with sufficient amenity value for the Council to want to continue to protect them in policy. The full list of Open Space sites was subject to review during the Local Plan production process, with those sites that have subsequently built on deleted and sites where boundary edits were necessary refined, for example to exclude buildings which are not intended to be subject to PM5's provisions.

¹⁶ PMEB01 [Open Space and Sport Topic Paper \(2022\)](#)



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Issue 3 – Protection of Open Space and Local Green Space – Policy PM5

Q2 Is Policy PM5 consistent with paragraph 99 of the Framework, which states that existing open space, sport and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met?

Q2 DDC Response:

41. The NPPF at paragraph 99 advises that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
42. PM5 is consistent with paragraph 99 in that it will not support the loss of open space including outdoor recreation facilities, playing fields, allotments, or built and indoor sports facilities unless a robust assessment of local provision identifies a surplus in the catchment area to meet both current and future needs, and consideration has been given to all functions that these facilities can perform having regard to any deficiencies of other typologies in the area, or any replacement facility provides a net benefit to the community in terms of quantity, quality, availability and accessibility of open space or sport and recreation facilities.

Q3 How did the Council decide which sites to allocate as Local Green Space? Are the 14 sites consistent with paragraph 102 of the Framework, which sets out when Local Green Space designations should be used?

Q3 DDC Response:

43. The assessment process carried out by the Council for Local Green Spaces (LGS) and its conclusions are set out in detail in Open Space and Sport Topic Paper (2022)¹⁷.

¹⁷ PMEB01 [Open Space and Sport Topic Paper \(2022\)](#)



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Issue 3 – Protection of Open Space and Local Green Space – Policy PM5

44. Section 6 of the Topic Paper includes detail on how the sites allocated as Local Green Space are compliant with paragraph 102 of the NPPF. In addition, the same section goes on to highlight relevant paragraphs from Planning Practice Guidance which were key in informing the Council's assessment of the 54 sites submitted as potential LGS during the Call for Sites in 2021.
45. The full Local Green Space assessment can be found in Appendix 3 – Local Green Spaces Assessment and the 14 sites protected as LGS under PM5 are listed in paragraph 7.9 of PMEB01.
46. As set out in the plan at paragraph 6.84, the policy also enables protection of Local Green Space identified throughout the plan period, which may be designated through other mechanisms such as Neighbourhood Plans, which form part of the development plan upon adoption.



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Issue 4 – Community Facilities – Policy PM6

Issue 4 – Community Facilities – Policy PM6

Q1 Are Policies SP2 and PM6 consistent with paragraph 93 of the Framework, which states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs?

Q1 DDC Response:

47. Paragraph 93 of the NPPF sets out the following:

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community;
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services

48. The Council considers that both SP2 and PM6 are consistent with this requirement. Policy SP2 sets out a strategic approach to improving health and well-being in the district through the delivery of long-term, sustainable development and placemaking. It supports the creation of healthy, inclusive communities in the district over the Plan period as part of an overall integrated approach to the location of housing and economic growth as set out in the Strategic Policies of the Plan. Policy SP2 is an overarching policy and includes requirements on new development to plan positively to deliver developments that are well served by community facilities, local services, cultural infrastructure, greenspaces and spaces for play, recreation and sports (SP2 1, 6 and 9). It protects against the loss of existing facilities and services (SP2 3),



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Issue 4 – Community Facilities – Policy PM6

promotes the dual-use and co-location of services in line with Paragraph 93 a) (SP2 3) and promotes the expansion or enhancement of existing facilities and services (SP2 3) Policy R3 of this Plan also supports the retention of existing local shops, acknowledging the vital role they play in meeting local residents day-to-day needs.

49. Policy PM6 provides more detailed policy requirements to ensure that the district's communities are well served by social, recreational and cultural facilities and services. Part 1 of Policy PM6 addresses the provision of new facilities and services in line with Paragraph 93 a) and supports the retention and enhancement of existing community facilities and services in line Paragraph 93 c)
50. The Council considers that Policy PM6 Part 2 is fully compliant with the requirement that policies guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Part 2 of Policy PM6 makes clear that the loss of existing community facilities and services will only be acceptable in very limited circumstances. Proposed Additional Modification AM90 proposes strengthening this further with the addition of the word exceptional (see response to Q2 below). With specific regard to facilities in rural settlements Policy PM6 states:

“in rural settlements when applications are submitted for the loss or change of use of facilities and services, account will be taken of its importance to the community that it serves and the range of other facilities and services that would remain. Permission for the loss or alternative uses will not be given if the rural community would be left without any local services or facilities, or the range would be seriously diminished, unless the applicant has demonstrated that the use is no longer commercially viable or otherwise viable”.

Q2 What are the reasons for the suggested changes to Policy PM6? Why are they necessary for soundness?

Q2 DDC Response:

51. The proposed additional modification AM90 within SD06 seeks firstly to add reference to shared facilities to the third paragraph of Part 1 of Policy PM6 to better reflect the requirements of NPPF paragraph 93 a). The shared use of facilities takes place in a number of community buildings in this district and is already referred to in Policy SP2 and in the Implementation section of the supporting text of this policy (paragraph 6.98).
52. Secondly, AM90 clarifies, in the second paragraph of Part 2 of the Policy that the loss or change of use of community services or facilities will only be granted in exceptional circumstances. This is consistent with both the nature of the criteria a) to d) that follow



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Issue 4 – Community Facilities – Policy PM6

this sentence, and with paragraph 93 c) of the NPPF which requires planning policies to guard against unnecessary loss of valued facilities and services.

53. The proposed additional modification AM91 corrects a typing error.
54. Whilst such additional modifications add clarity and therefore contribute to the effectiveness of Policy PM6, the Council does not consider the changes to be necessary for soundness.