



Report of Director of City Development

Report to Executive Board

Date: 9th May 2013

Subject: Leeds LDF Site Allocations Plan – Issues and Options for Public Consultation

Are specific electoral Wards affected?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, name(s) of Ward(s): All		
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, Access to Information Procedure Rule number:		
Appendix number:		

Summary of main issues

1. The Site Allocations Plan will form part of the development plan for Leeds (the LDF). Its' purpose is to identify land in appropriate locations to meet some of the key requirements of the Core Strategy. The scope of the Site Allocations Plan was established by the Executive Board in May 2012 to comprise housing, employment, retailing and green space.
2. National planning guidance (the NPPF) requires the Council to determine the scale of housing needed over the plan period. This is set out in the Core Strategy which, amongst other things, indicates that we need to allocate land for 66,000 new dwellings together with some safeguarded land that provides further scope beyond the plan period, should this be necessary. The Site Allocations Plan is required to identify appropriate sites. In the context of these national and local drivers considerable work has been undertaken with members and through the Development Plan Panel to ensure that the package of sites put forward for consideration is as sensitive to local concerns as possible, limiting the impact on the green belt and respecting the character and identity of communities.
3. The material presented today has emerged from an extensive period of engagement with members across the district. Two workshops were held in September, followed by ward meetings to consider potential sites and then a further 11 meetings based on the housing market areas defined in the Core Strategy. The

outcome of this work has then been debated through four meetings of the Development Plan Panel.

4. Housing has been by far the most contentious issue given the scale of the land requirement and the need to use Greenfield and green belt land. The need to meet the housing targets, to provide for an additional element of safeguarded land and at this stage to offer some choice and flexibility for communities to consider has meant that the package recommended by the Panel has not always been able to accommodate the local concerns raised by members on individual sites.
5. It is important to remember that this is only the first stage of plan production. This is not a draft plan with draft allocations but is put forward to facilitate early community and stakeholder engagement on the range of options. There will need to be a thorough review of consultation responses before a draft plan emerges. Whilst the timetable is in part dictated by progress with the Core Strategy there is a need to have an up to date plan in place at the earliest opportunity. With this in mind it is hoped to move to a draft plan for consultation towards the end of the year with potentially an examination in late 2014

Recommendations

6. Executive Board is requested to approve the Site Allocations Plan Issues and Options documents (Volumes 1 and 2 attached) for the purposes of public consultation.

1.0 Purpose of this Report

- 1.1 This report seeks approval to the site allocations material set out in the attached documents to enable public consultation to take place in June/July 2013.
- 1.2 In aspiring to be the 'best city in the UK', the Core Strategy takes forward the spatial and land use elements of this vision. Central to this approach is the desire to plan for anticipated population changes and the homes, jobs, education and investment needed across the District in a sustainable manner. Consequently, whilst supporting the ambitions for regeneration, growth and infrastructure, a key emphasis of the plan is for this to be achieved in a form which respects and where possible, addresses local needs, character, distinctiveness and the management of environmental resources. Leeds has in the past successfully accommodated growth and a buoyant economy whilst protecting the green belt and the identity and character of its settlements. We need to plan for substantial additional growth over the plan period allowing the economy to continue to grow and recognising the changing demographics, meeting the housing needs of the young and of the growing elderly population. It is the task of the Site Allocations Plan to identify the sites to meet these needs building on this past success and delivering the ambitions and principles set out in the Core Strategy. This will in turn help inform and be informed by emerging Neighbourhood Plans.
- 1.3 It is important to note that the Issues and Options documents are not a draft plan. It is about providing some initial ideas for the delivery of the Core Strategy's targets and ambitions. This includes a very wide range of sites, exposing the options that are potentially available, and providing considerable choice at this early consultation stage. At this time it would therefore be a mistake to regard the sites as draft allocations and planning applications on them would clearly be premature unless the proposals would be acceptable when considered in the context of existing planning policy. This would not be the case for sites currently in the green belt or PAS sites not covered by the Council's recently adopted informal policy. It cannot be assumed that sites that are currently considered the most favourable opportunities will necessarily remain so throughout the plan preparation process. Consultation and further assessment may well expose difficulties that are not apparent at this time or indeed better alternatives.

2.0 Background Information

Context

- 2.1 The National Planning Policy Framework requires the Council to have an up to date development plan, now often referred to as the local plan. This needs to include both strategic policies and the site specific allocations that put the policies into effect. The Council has recently approved and submitted for examination its Core Strategy which amongst other things sets the housing target for the district.
- 2.2 The Executive Board on 16th May 2012 agreed the scope of the Site Allocations Plan to cover the planning topics of: Retail, Housing, Employment and Greenspace allocations. The Core Strategy, agreed by Council on 14th November 2012 and

subsequently submitted to the Secretary of State to arrange for public examination, provides the context. The Site Allocations Plan is about the delivery/implementation of the policies and proposals set out in the Core Strategy, for the topics within scope.

- 2.3 The minutes of Executive Board (16th May 2012) stressed the need for close member involvement in the site allocations process. To set the scene two workshop sessions were held at the end of September 2012, to which all members were invited. A representative of the Planning Advisory Service was invited to give an overview presentation on the key role and purpose of site allocations plans. Council officers also presented on the work being undertaken in Leeds and gave examples of site assessment approach.
- 2.4 There is a significant amount of site assessment work sitting behind the material present to Executive Board today. An important ingredient is the site assessment proforma which provides a consistent basis for considering the development potential of a site. This was shared with members and subsequently amended as a result of comment at the Development Plan Panel.
- 2.5 As was stressed in the presentations to Members we are at the initial stage of site allocations work. The material before Executive Board today is referred to as the “Issues and Options” stage. This is very much about our early ideas and providing material in a way that allows for public input to help shape the final plan. For instance on housing the plans identify all the sites under consideration, far more than is actually needed to meet the Core Strategy targets. A series of questions are posed in each of the topic areas to facilitate public feedback. A more definitive set of allocations with detailed requirements will emerge once the outcome of consultation has been considered.
- 2.6 This is an important point to recognise as site allocation is part of a process that must ultimately lead to the delivery of new development of an appropriate form and quality, alongside the necessary infrastructure. It is not simply a matter of allocating land but about place making and the “liveability” of the communities we create. Work on site allocations is a continuation of the work undertaken on the Core Strategy involving dialogue with other council services, infrastructure providers, communities and other stakeholders. It will be important to recognise the changing demographic picture to ensure that the schools, elderly care facilities, recreation facilities and provision for other community needs reflects the emerging picture.
- 2.7 Following the workshops there has been a further two stage process of general member engagement. The first of these was a series of meetings on a ward basis, with 37 meetings held between 25th September - 5th November 2012. At these meetings officers shared site information and obtained member feedback. In many cases members suggested new sites which were then fed into the site assessment process. Throughout this process members have recognised that the targets have been established by the Core Strategy and the emphasis has therefore been on promoting sites that meet the objectives of the Core Strategy in the most sensitive and sustainable way.

2.8 The second stage was a series of meetings based on the Housing Market Characteristic Areas (HMCA). This was considered appropriate as meeting the housing target is the most challenging issue for the Site Allocations Plan and each of the 11 HMCA is given a separate target in the Core Strategy. Working on this basis also allowed members to see what was happening in the other parts of the HMCA of which their ward formed a part. As ward and HMCA boundaries do not coincide some members attended more than one meeting. Through this process members were updated on the emerging position including an assessment of new sites, were asked to confirm that officers had accurately recorded views from the earlier meetings and were invited to comment on the updated proposals presented by officers.

2.9 Having completed this wide ranging review with members, reports were presented to a series of Development Plan Panel workshops on 5th March, 9th April and 16th April. These sessions sought to concentrate on the issues and sites of concern to members remaining from the earlier meetings. In a number of cases members determined that the Panel should undertake site visits before coming to a conclusion. The Development Plan Panel then met in formal session on 30th April to agree the material to be recommended to the Executive Board at today's meeting.

3.0 Main Issues

Overview

3.1 The material presented today reflects the debate through the Panel workshops and site visits. Members, both at Panel and more generally, remain concerned about the scale of development and the impact this has on the green belt and other greenfield sites. The Council is committed to protecting the green belt as much as possible and it is recognised that all greenbelt land is sensitive and the debate through Panel has aimed to achieve a range of sites that have least impact on the purposes of green belt, whilst also recognising the Core Strategy aspirations to respect local character and identity. As far as possible sites have been selected that provide a rounding off to a settlement or could reasonably be considered to be infill and which are visually and physically contained. The importance of trying to retain as much of the green belt wedges that extend into the main urban area was a factor recognised particularly on the site visits. However, in order to meet the targets, in some housing areas it has been necessary to include sites that are not ideal but which are judged to be least worst. It should also be remembered that at this stage of providing options the green belt impact will not ultimately be as great in some areas as the current plans might suggest.

3.2 Another area of concern has been the relationship between the site allocations and the infrastructure needs this implies. Members have continuing concerns that the infrastructure requirements will be significant in some areas and timing of delivery is uncertain. This is entirely understandable. However, particularly at this stage when the final pattern of allocations is unknown, it is not possible to be sure of the need for infrastructure. As work progresses there will be continuing dialogue with infrastructure interests, for instance Children's Services and Highways. Where appropriate reference will be made in the detailed allocations to the need for infrastructure such as roads and schools, requirements will emerge as planning

applications are made and the Council will need to make decisions on how it allocates resources including CIL and New Homes Bonus to support areas of growth.

3.3 The documents circulated for the meeting today include a number of minor changes arising from the Development Plan Panel meeting on 30th April. In addition the Panel requested that officers consider redrafting the paragraph and question relating to LBIA in Volume 2, Chapter 1, Aireborough and circulate this to Panel members for further comment. The final version will therefore be circulated at the meeting.

The Consultation Documents

3.4 The Issues and Options material is organised into: Volume 1 providing a general overview; and Volume 2 which includes 11 chapters, one for each of the Housing Market Characteristic Areas.

3.5 Volume 1 provides an overview of all topic areas. It sets the context and the approach taken to the identification of sites for development or protection. A key point is that the site allocations plan must be based on the Core Strategy and Volume 1 provides a summary of the main points for each topic area. This comes with a health warning that work on site allocations is happening concurrently with work on progressing the Core Strategy to adoption and it is therefore possible that as a result of the independent examination detailed numerical and policy requirements may change. Volume 2 then seeks to apply the principles set out in Volume 1 to each of the 11 HMCAs.

Retailing

3.6 Consistent with national guidance the Core Strategy identifies the City Centre and the centres listed in Policy P1 as the focus for retail activity. Site allocations work has concentrated on a review of centre boundaries, which essentially stem from the work undertaken for the UDP in the early 1990s, or the definition of boundaries for new centres. The site allocations plan is not promoting specific new retail allocations but where opportunities have been identified and where appropriate, changes to centre boundaries create some scope to accommodate new retail proposals (or other town centre uses e.g. offices). This exercise included a review of sites put forward by third parties, although few were submitted for retailing alone.

3.7 Apart from considering boundaries retail work includes a review of the primary and secondary shopping frontages within centres. These form the basis for controlling the mix of uses in key locations within centres. As required in national guidance (NPPF para 23) the primary shopping area of a centre is also defined; in smaller centres this often coincides with the centre boundary. Volume 2 includes plans illustrating the proposals for all centres together with a series of questions to help obtain feedback.

Housing

3.8 The Core Strategy establishes a need to find land for 66,000 dwellings. Policies SP6 and 7 provide some guiding principles to aid site identification and set a target for each of the 11 housing market characteristic areas. Sites with planning permission and existing allocations can clearly contribute towards the targets leaving a residual requirement in each area to find from new sites. As Volume 1 explains the source of sites for consideration has been the Strategic Housing Land Availability Assessment (SHLAA) together with sites put forward for consideration by members at the ward meetings. A detailed site assessment has been undertaken for each site, including a site visit. Sites have then been debated with members through the meetings described in paras 2.7 and 2.8 and subsequently at Development Plan Panel. The outcome has been the coding of sites against a “traffic light” system as follows:

- Green - sites which have the greatest potential to be allocated for housing
- Amber - sites which have potential but there may be issues which need to be resolved, or the site may not be in such a favoured location as green sites
- Red - sites which are not considered suitable for allocation for housing.

3.9 It is important to note, that where practicable, the objective has been to ensure that the total provided for in the green and amber categories is substantially more than the residual requirement in each of the HMCAs. There are a number of reasons for this. It is important to recognise that “Issues and Options” is just that and needs to provide choices for public comment. If the Council’s proposals precisely matched the targets it would give the impression that decisions had already been made and that the plans showed draft allocations. That in turn might encourage premature applications which is clearly not appropriate at this stage. A further reason is that as the overview explains the Site Allocations Plan will also need to consider designation of further ‘protected areas of search’ for future development, in accordance with the Core Strategy, to ensure the long term endurance of the Green Belt. These designations will come from the same pool of sites.

3.10 Reflecting these considerations the position recommended by the Development Plan Panel is set out in the table below.

Housing Market Characteristic Area	Housing Target	Residual Requirement	Green Capacity	Amber Capacity	Green + Amber
Aireborough	2,300	1,548	806	1,487	2,293
City Centre	10,200	5,248	3,684	1,995	5,679
East Leeds	11,400	3,040	1,688	1,445	3,133
Inner Area	10,000	2,059	2,173	3,950	6,123
North Leeds	6,000	3,035	911	2,690	3,601
Outer North East	5,000	3,933	2,323	3,525	5,848
Outer North West	2,000	1,017	270	1,192	1,462
Outer South	2,600	2,407	1,211	2,042	3,253
Outer South East	4,600	3,534	1,121	11,400	12,521
Outer South West	7,200	5,586	4,154	5,499	9,653
Outer West	4,700	2,660	1,655	1,860	3,515
Total	66,000	34,067	19,996	37,085	57,081

3.11 Given the scale of the housing challenge and the need to promote green belt and other greenfield sites in order to meet targets, this has been the most contentious issue for members. It is recognised that the package of proposals recommended by Panel as being necessary to meet the strategic objectives set by the Core Strategy includes a number of sites which at a local level remain a significant concern for members.

3.12 National guidance requires local authorities to plan for the needs of gypsies and travelling show people, including a need to provide a five year land supply, mirroring the approach taken with normal housing. This is recognised in the Core Strategy which advises that further assessment is required to determine an up to date position on need, over and above the short term initiative to provide additional pitches at Cottingley. This work is on-going and in the interim the Issues and Options consultation is seeking views on whether any of the housing opportunities might also be suitable for this use and inviting suggestions for alternative sites.

3.13 The position is similar in relation to elderly accommodation. The Core Strategy recognises that this is of growing importance within the wider housing market, without setting specific targets. The consultation seeks views on whether any of the housing sites are considered particularly suited to meet this need either in whole or as part of a wider scheme.

3.14 Detailed schedules and plans for each of the 11 HMCAs indicating the categorisation of sites and summary reasons are set out in Volume 2. A series of questions seeks views on whether or not that categorisation is appropriate and provide an opportunity for entirely new sites to be suggested.

Employment

3.15 The overview explains the requirements set out in the Core Strategy for general employment land (493ha) and for office floorspace (706,250sqm) and that the source of sites for assessment is the Employment Land Review and a call for sites. The position on employment land is very different to that for housing. In this case much of the requirement can be met from existing allocations and permissions. Employment opportunities tend to be concentrated in well established locations such as the City Centre and Aire Valley. As such there is not a specific target for each area. Volume 2 reviews the existing position and any new sites using a similar colour coding to that described above for housing. As noted in para 3.6 the review of centre boundaries may provide some scope for additional office floorspace.

Greenspace

3.16 The overview sets out the methodology used to assess the current provision of greenspace against the standards set out in Policy G3 of the Core Strategy and to draw conclusions on the quality, quantity and accessibility of greenspace in the future. The information collected as part of the Open Space, Sport and Recreation Assessment (July 2011), referred to as the 'open space audit', has been used as a baseline, as it provided a more up to date picture of greenspace in Leeds than the UDP Review 2006. Nevertheless, certain sites were surveyed more recently to ensure that the base data is as accurate as possible. This has flagged up where

UDP greenspace allocations are no longer functioning as greenspace; where the boundaries of known greenspace sites have changed and where new pieces of land are being used as greenspace. The greenspace identified in the UDP has therefore been updated and subsequently identified as part of the Site Allocations Plan – Draft Issues and Options.

3.17 Using this updated data, the quantity, quality and accessibility of greenspace across the city has been assessed against Policy G3. This has identified whether there is an adequate amount of each type of greenspace (for each area), whether these sites are of sufficient quality and how accessible they are. The findings have generated a number of questions, which are set out in the material for each area in Volume 2. There are some variations in the questions between areas to reflect local circumstances. This includes seeking views on whether apparently redundant/surplus greenspace might be used for other purposes.

4.0 Other considerations

Sustainability Appraisal

4.1 As outlined in this report, the Core Strategy provides the overall strategic context for the preparation of the Site Allocations Plan. Proposals contained in this Plan, therefore need to be consistent with the overall approach of the Core Strategy, which in itself has been subject to a Sustainability Appraisal.

4.2 With regard to the Site Allocations Plan, a Sustainability Appraisal Scoping Report was produced to set out the approach to assessing the Site Allocations document. In May 2012, the Scoping Report was sent to the 3 statutory consultees on sustainability appraisal (Natural England, the Environment Agency and English Heritage) and their subsequent comments have been incorporated whilst undertaking the Sustainability Appraisal. The Sustainability Appraisal includes an assessment of all the sites being considered for housing, employment and retail sites and centre boundaries where appropriate. The full Sustainability Appraisal report is available as a background document to this report.

4.3 More generally the principles of sustainable development will be applied as we move forward through plan preparation to implementation. It is not just about identifying and developing the sites but reflecting the social, economic and environmental impacts of development and creating quality in place making and liveability.

Infrastructure and Other Comments

4.4 Having sufficient infrastructure to serve the levels of development required in the Core Strategy is a key concern, both of members and the public. The first priority has been to get comments from the Highways Agency and the Council's Highways section, as access is a key determinant as to whether a site can be developed. We have also consulted or will be consulting 'infrastructure providers' including Education, Health providers/commissioners, Ecology, the Environment Agency, utilities, built heritage (archaeology and conservation). In some cases the need for a new school may need to be part of an allocation. Where we have not yet received

comments, these will be included in the site assessments once received, prior to making final decisions on which sites to allocate (hence site assessments will be added to over time and some sections may be incomplete at present).

Duty to cooperate

4.5 The Localism Act (2011) and the National Planning Policy Framework (March 2012), provides details of legal and soundness requirements that the Council and other public bodies have to satisfy. This includes a 'duty to cooperate' on planning issues that cross administrative boundaries, especially those that relate to strategic priorities and allocations set out as part of the Core Strategy and Site Allocation plans (including the homes and jobs planned for). Whilst neighbouring authorities have always had to consult each other on their planning documents, the duty requires joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. In producing the Site Allocations Plan any cross boundary issues will need to be identified and considered – for example whether any proposed allocations near adjacent authorities will create pressure on schools in other areas and conversely whether proposals of adjacent authorities will affect infrastructure within Leeds. Close working with neighbouring authorities will therefore be necessary. A working group of officers from neighbouring authorities (reporting to the Heads of Planning Group) has been established to consider implications of the duty to cooperate in producing Core Strategies and Site Allocation and other plans.

Next Steps

4.6 Subject to approval by Executive Board it is proposed to undertake public consultation on the Issues and Options documents for 8 weeks during June/July. The outcome of this exercise will need to be reviewed in detail through the Development Plan Panel prior to any further site selection and detailed allocations being produced. Members will then need to determine whether further informal consultation is appropriate or whether to move to publication of a draft plan. Given the scale of the task it is unlikely that further proposals will emerge before the late autumn. Following publication and submission a public examination to consider representations will need to be held prior to the plan being adopted. It is hoped that the examination will take place in 2014 but this depends in part on progress with the Core Strategy.

4.7 The development of more detailed proposals as specific site allocations are established provides the opportunity to reflect the needs of placemaking/liveability referred to earlier (para 2.6). This will be an opportunity to promote proposals that reinforce the character of places, secure improvements or in some cases create entirely new communities. For larger allocations we may wish to specify a need for on site school provision or the creation of a new local centre or park. It is also important not to be too prescriptive and attempt to second guess what might be needed in 10-15 years time. The Site Allocations plan is setting the scene for the further debate that can take place through the planning application process. The current debates on the East Leeds Extension and Thorpe Arch are good examples of this where the detail is being worked up through master-planning and with community input through community forums chaired by local members. Through

this dialogue agreement is being reached on the provision of new facilities including schools and a country park as well highway improvements in a way that meets community aspirations. There may be a number of locations in the emerging plan that could be developed in the same way. Possible examples are around Garforth or the new settlement proposal east of Bramham, should these emerge as allocations in the final plan. In some cases more detail on the form of development and community expectations will come through the neighbourhood plan route, a number of which are currently underway across the district.

5.0 Corporate Considerations

5.1 Consultation and Engagement

There has been extensive consultation with members in the course of preparing the Issues and Options material. The purpose of this report is to seek authority for wider public consultation.

5.2. Equality and Diversity / Cohesion and Integration

An Equality Impact Assessment Screening has been undertaken on the full Issues and Options plan prior to presentation to Executive Board and is attached as an appendix. Equality, diversity, cohesion and integration issues are being considered as part of the preparation of the plan and through the sustainability appraisal work which is ongoing.

5.3. Council Policies and City Priorities

The Site Allocations Plan is a key document which forms part of the Local Development Framework, and provides details and allocations to enable the Council's Core Strategy to be delivered. Its delivery is therefore a Council priority. The plan will reflect Council policies and city priorities identified in the Vision for Leeds and the Core Strategy long term spatial vision, objectives and policies.

5.4 Resources and value for money

For the Local Development Framework to be as up to date as possible, the Council needs to produce the Site Allocations Plan as quickly as possible following on from production and adoption of its Core Strategy. This will provide value for money in that the council will influence and direct where development goes. Without an up to date plan the presumption in favour of development by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.

5.5 Legal Implications, Access to Information and Call In

The Site Allocations Plan will follow the statutory development plan process (Local Development Framework). Due to the timescales involved in the Development Plan Panel clearance process, it was not possible for this report and appendices to be circulated with the formal agenda papers. It will therefore be submitted as a late item of business. Getting to this stage in plan preparation has meant a heavy work programme for both officers and members. Extra meetings of the Development Plan

Panel were scheduled on 9th and 16th April and members also agreed to a day of site visits on 18th April. These extra meetings have been held to maintain progress to the May Executive Board meeting. However, final Panel clearance to enable a recommendation to be made to Executive Board was only obtained at a meeting on 30th April. Given this and the need to accommodate any changes arising from the Panel debate it was not possible to meet the normal timetable for publication.

5.6 Risk Management

Without a current allocations plan(s), aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals. Early delivery is therefore essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. As identified at 5.4 above, without an up to date plan the presumption in favour of development by the Government means that any development or neighbourhood plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

6.0 **Conclusion**

6.1 The Site Allocations Plan Issues and Options provides preliminary ideas for site allocations. Consultation will create the opportunity for communities to better understand the challenges that the proposed scale of growth presents and to provide their initial feedback to help inform the plan making process. The proposals before the Executive Board follow extensive engagement with members and debate through the Development Plan Panel. It is recognised that at the local level members have reservations about some of the sites shown as potential allocations. However it is considered that the package of sites is necessary to meet strategic objectives, to provide choice at this early stage of the plan preparation and acknowledged that changes will arise following consultation and more detailed analysis.

7.0 **Recommendation**

7.1 Executive Board is requested to approve the Site Allocations Plan Issues and Options documents (Volumes 1 and 2 attached) for the purposes of public consultation.

8.0 **Background Papers¹**

8.1 Issues and Options Sustainability Appraisal report

8.2 A Greenspace report for each of the 11 Housing Market Characteristic Areas, with appended plans, with an analysis of greenspace quantity (by ward), quality and accessibility (in relation to Core Strategy Policy G3). It should be noted that due to file size not all of this information will be published on the internet, but can be made available on request.

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.