Draft Green Belt Supplementary Planning Document

February 2023

GUILDFORD BOROUGH

Table of contents

1. Introduction

1.1 The purpose of this Supplementary Planning Document (SPD) is to supplement Policy P2: Green Belt contained in the Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS). This SPD provides further guidance on how the exceptions listed in paragraphs 149 and 150 of the National Planning Policy Framework (NPPF) will be interpreted in relation to whether a proposal can be considered to constitute 'not inappropriate' development.

1.2 It is intended principally for applicants for planning permission and their agents, and for planning decision makers. It has been produced to ensure there is clarity and consistency on how the decision maker will apply national and local Green Belt policy. This SPD is a material consideration in planning decisions and decision makers will use it to help determine planning applications.

2. National Planning Policy context

2.1 Nation policy on Green Belt is contained in Chapter 13 called 'Protecting Green Belt land'. This includes policy and guidance on the purposes of the Green Belt, the exceptional circumstances necessary if proposing to amend Green Belt boundaries and the exceptions when the construction of new buildings are not considered 'inappropriate' and therefore do not need to demonstrate 'very special circumstances'.

2.2 This SPD provides further guidance on how the exceptions listed in paragraphs 149 and 150 of the National Planning Policy Framework (NPPF) will be interpreted.

3. Local Planning Policy context

3.1 Local Green Belt policy is contained in Policy P2 of the adopted contained in the Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS).

3.2 This SPD provides guidance to supplement Policy P2.

4. Inappropriate development

4.1 Unless listed as an exception (see next section for more detail), development is considered to be 'inappropriate' in the Green Belt. As set out in paragraph 147 of the NPPF, 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'.

4.2 'Very special circumstances' is not to be confused with 'exceptional circumstances'. The former relates to the test at planning application stage (namely whether there are very special circumstances that justify inappropriate development to occur in the Green Belt). Meanwhile the latter relates to the plan-making stage and whether there are exceptional circumstances to justify amending Green Belt boundaries. There is a very high bar set by the very special circumstances test. It should not be easily replicated across numerous proposals or be commonplace.

4.3 The NPPF goes on to say at paragraph 148 that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations' (emphasis added). When assessing harm to the Green Belt it should be noted that there is both definitional harm (by virtue of the fact that the development is, in principle, 'inappropriate') as well as actual harm that the proposal may have on the openness of the Green Belt and its five main purposes as set out in paragraph 138 of the NPPF. Case law[1] has also established that when the decision maker is assessing 'any other harm', this is not limited to Green Belt harm but can include any other non-Green Belt harm that may be caused by the proposal, for instance in relation to character or highways. It is worth noting that simply because a proposal may not cause 'any other harm' does not in itself constitute very special circumstances.

4.4 Occasionally applicants may seek to justify very special circumstances by way of demonstrating that there is a 'fall back' position. A fall-back position relates to an alternative proposal that could be reasonably achieved, be that one which already has extant planning permission (although is not yet implemented) or one which is permitted development that could be undertaken under permitted development without the need for planning permission. In assessing such a proposal, the Council will first determine whether there is a realistic alternative that is capable of being implemented and if so whether this alternative proposal is more harmful than the proposal being considered under very special circumstances. If the outcome of this assessment concludes that there is a more harmful alternative proposal, then the fall back position is capable of being a material consideration. However, in determining the level of weight that this should be given, the decision maker will need to assess the likelihood that the alternative proposal would be implemented. If the alternative proposal is not a realistic alternative, then this will be given less weight in determining the application.

[1] Redhill Aerodrome Limited v Secretary of State for Communities and Local Government, Tandridge District Council, Reigate and Banstead Borough Council [2014] EWHC 2476 (Admin)

5. Not inappropriate development

5.1 Whilst most development is considered inappropriate in the Green Belt and will need to demonstrate 'very special circumstances', the NPPF contains a list of exceptions at paragraphs 149 and 150. To be considered 'not inappropriate' a proposal needs to satisfy at least one of the exceptions. It is worth noting that the exceptions are not mutually exclusive, and a proposal is capable of falling within two exceptions. For example, an extension to an agricultural building that did not result in disproportionate additions over and above the size of the original building would fall within both NPPF para 149(a) and (c). Equally a proposal may fall into one exception and be contrary to another. For example, an extension to an agricultural building did result in disproportionate additions over and above the size of the original building would fall within NPPF para 149(a) but be contrary to (c). It would therefore still be considered not inappropriate development. Applicants are expected to clearly identify which exception they consider their proposal falls within as part of their planning application submission.

5.2 Following the Lee Valley judgement[2] it is important to note that once a particular development is found to be, in principle, not inappropriate, the question of the impact of the building on openness is no longer an issue unless it is qualified as such in the NPPF. This further consideration of the impact on openness is therefore limited to those exceptions listed in paragraphs 149(b), 149(g) and 150. For all the other exceptions listed, the consequential impact of the development on the openness of the Green Belt is not relevant. However, these proposals will still need to be assessed against other policies in the NPPF, and in the development plan, including policies such as the visual impact of the proposal on landscape character.

5.3 The remainder of this section will provide additional guidance and clarity in relation to the Council's approach in assessing each of the exceptions listed in paragraphs 149 and 150 of the NPPF. Any development proposals that do not meet the strict criteria of these exceptions will be considered to be inappropriate development and planning permission will not be granted unless very special circumstances can be demonstrated.

5.4 The Council will not accept the position that a development proposal should be considered not inappropriate development simply because it is well designed or results in no other harm. Equally, simply because a development proposal is considered to be not inappropriate in Green Belt terms does not mean that it will automatically be approved. It still needs to meet all other policies, including those on good design.

Buildings for agriculture and forestry

5.5 NPPF paragraph 149(a) states one of the exceptions is 'buildings for agriculture and forestry'.

[2] R (Lee Valley Regional Park Authority) v Epping Forest DC and Valley Grown Nurseries Ltd [2016] EWCA Civ 404

5.6 For the purposes of this exception, the term “agriculture” includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes.

5.7 In order to fall within this exception, applicants will need to demonstrate that the intended use of the building is related to and supports agricultural and forestry related activities, for example a barn. This is to prevent new buildings that would otherwise be considered inappropriate. This includes dwellings for rural workers in agriculture or forestry as these buildings are by definition for residential use. Consequently, even though they may support an agricultural or forestry use, they are not in themselves buildings for agriculture or forestry. A proposal for an essential agricultural worker’s dwelling will be assessed under very special circumstances and if approved necessary conditions would be applied to restrict its future use.

5.8 Whilst there is no restriction in terms of size or location of such a building from a Green Belt perspective, other design and landscape policies, for example the setting of a listed building or the impact on the Area of Outstanding Natural Beauty, are still applicable.

Appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments

5.9 NPPF paragraph 149(b) states one of the exceptions is ‘the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it’.

5.10 Previous national planning policy in Planning Practice Guidance 2 required that the facilities were ‘essential’ rather than appropriate. Whilst it is no longer necessary under the NPPF to demonstrate that the proposed facility is essential, it still needs to be demonstrated that it is an ‘appropriate’ facility. For this reason, evidence should be submitted which demonstrates that it is reasonably required. Any buildings should also be designed to meet its intended purpose.

5.11 Possible examples of such facilities could include changing rooms, a sports pavilion or a clubhouse for outdoor sport, stables for outdoor sport and outdoor recreation.

5.12 This exception is also restricted to those facilities that ‘preserve the openness of the Green Belt and do not conflict with the purposes of including land within it’. For further guidance on the types of factors that will be assessed when considering the impact on openness, please see Section 6 below.

Extension or alteration of a building

5.13 NPPF paragraph 149(c) states one of the exceptions is ‘the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building’.

5.14 It is worth re-iterating that the LPSS defines at Policy P2(2)(a) that the original building is that which existed on 1 July 1948 or, if no building existed on 1 July 1948, then it is the first building as it was originally built after this date (emphasis added). This means that it does not constitute any replacement building as it was originally built. Applicants are expected to submit what they consider to be the 'original building' as part of their planning application submission so that this can be agreed as the baseline position.

5.15 The first test is whether the proposal amounts to 'an extension or alteration'. A High Court decision[3] has ruled that in order to fall within this category, an extension to a property does not necessarily need to be connected to the building to which it is an addition. Instead, the nature of the host building, the use of the new building, its position, its size in relation to the host, and its degree of attachment were all likely to be relevant. Whether or not a proposal amounts to an extension will be a matter of judgment for the decision maker based on the specific circumstances before them. This could therefore include an outbuilding that is used as ancillary to the main dwelling such as a study or games room.

5.16 The second test is that it does not result in disproportionate additions over and above the size of the original building. The LPSS does not define a particular floorspace or volume percentage above which may be considered to be 'disproportionate'. Setting such a percentage would imply that anything under this is proportionate and anything in excess of it is disproportionate. Whilst the overall percentage increase in scale is likely to give a strong indication of the extent to which an extension may be considered disproportionate, to look solely at this factor is an over-simplification of the issue. There are many other factors, listed below, aside from floorspace and volume which would help inform a decision maker on whether an extension is disproportionate. Consideration would need to be given to all these factors in the round. All the following factors would need to be carefully considered as part of the design process in order to conclude an extension is not disproportionate.

a. the proposal's mass, bulk, external dimensions, footprint and height,
b. the scale of the existing property relative to its plot size, and
c. the overall extent of its visual perception.

5.17 The benefit of not setting a somewhat arbitrary percentage is the flexibility it offers to consider these factors in the round when coming to a decision. For instance, proposals for a loft conversion would lead to an increase in the building's floorspace however it would have a likely minimal, if any, increase in volume, mass, bulk and height. Equally a new basement proposal would result in an increase in floorspace and volume however it would likely not result in an increase in its the visual perception or the building's bulk and height. In these cases, the policy as written affords greater flexibility to assess these aspects cumulatively when arriving at a conclusion as to whether the extension should be considered not inappropriate development. The Council recommends that pre-application advice is sought early on in the design process in order to explore on a site-specific basis what scale and design of extension may be considered to be acceptable.

[3] Warwick District Council v Secretary of State for Levelling Up, Housing and Communities [2022] EWHC 2145 (Admin)

5.18 If a development proposal includes both an extension and a re-use of an existing building, then the assessment of whether it is disproportionate will be confined to the extension only. Any additional floorspace that is gained through the conversion of an existing building will be assessed separately under NPPF paragraph 150(d).

Replacement of a building

5.19 NPPF paragraph 149(d) states one of the exceptions is 'the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces'.

5.20 It is worth noting that LPSS Policy P2(2)(b) defines the circumstances where a new building will constitute a 'replacement' building. Namely that it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt. However as in the case of extensions, the policy remains silent on what percentage scale of increase the Council would consider as being 'materially larger'. Although it should be noted that whilst there may be a number of factors that determine whether a proposal is 'disproportionate', the assessment of 'materially larger' relates more closely to the size and scale of the development. Furthermore, even relatively small percentage increases could be considered to be materially larger for the purposes of this policy. Whilst no percentage increase is defined, it should also be noted that the Council considers that the 'materially larger' test is a significantly more restrictive test in terms of the increase that may be found acceptable than 'disproportionate'. Clearly if the intention was to apply the same test to replacement dwellings as extensions the same word would have been used in the NPPF.

Limited infilling in villages

5.21 NPPF paragraph 149(e) states one of the exceptions is 'limited infilling in villages'.

5.22 In order to qualify for this exception there are two tests that need to be satisfied. The first is whether the proposal is 'in' a village and the second is whether the proposal comprises 'limited infilling'.

Is the proposal 'in a village'?

5.23 This requires two further considerations – first, is the proposal located at a settlement that is defined as a 'village' and second, whether the proposal can be considered to actually be in the village (rather than on the edge of or in close proximity to the village).

5.24 In terms of the first consideration – whether it is a village location. LPSS Policy P2(c)(i – iii) defines all the settlements within the borough that are considered to be a 'village'[4]. In terms of the second consideration – whether the proposal is actually considered to be in the village, the approach varies as set out below. It is likely that a range of factors would be considered in arriving at a conclusion. This list is not exhaustive but it could include consideration of the following:

- The presence of a pavement rather than a grass verge along the road frontage
- Accessibility of day-to-day services and facilities
- Location of reduced speed limit signs or signs with the village's name
- Presence, proximity and relationship of neighbouring properties
- Pattern of development and relationship to the main built up area and the surrounding countryside

LPSS Policy P2(c)(i) – villages with identified settlement boundaries

5.25 These villages are all washed over (included) in the Green Belt except for parts of East Horsley, West Horsley and Ripley which are inset (excluded) from the Green Belt. However, they are all of a scale and nature that it is possible to identify the core village area. The policies map includes an identified settlement boundary around this area of each village listed. Within this area, any proposal can be definitively assessed as being 'in the village'. However, it is important to note that this area is not definitive and there may be parts of the village outside of this boundary which could also be considered to be 'in the village'. Development proposals within these areas will need to make a compelling case as to why, in that specific case, the site should be considered to be in the village for the purposes of this policy. LPSS paragraph 4.3.22 states: 'There are a number of considerations to take account of when assessing whether a site is located within the village. This includes factors such as the pattern of development, and the proposed development's relationship to the built up area of the village and the surrounding countryside.'

LPSS Policy P2(c)(ii) – inset villages

5.26 These villages are inset (excluded) from the Green Belt and have a Green Belt boundary around them. Within the inset area proposals do not need to accord with Green Belt policy and any proposals for development will instead be assessed against other policies such as design.

[4] These are listed as: Albury, Artington, Ash Green, Chilworth, Compton, Eashing, East Clandon, East Horsley, Effingham, Fairlands, Farley Green, Flexford, Fox Corner, Gomshall, Holmbury St Mary, Hurtmore, Jacobs Well, Normandy, Ockham, Peaslake, Peasmarsh, Pirbright, Puttenham, Ripley, Send, Send Marsh/ Burnt Common, Seale, Shackleford, Shalford, Shere, The Sands, Wanborough West Clandon West Horsley, Wisley, Wood Street Village and Worplesdon.

5.27 However, the Green Belt boundary is not definitive of the extent of the core village area and there may be parts of the village outside of the inset boundary (which itself was primarily assessed based on whether that part of the village made an important contribution to the openness of the Green Belt) that would also be considered to be 'in the village'. Development proposals within these areas will need also to make a compelling case as to why, in that specific case, the site should be considered to be within the village for the purposes of this policy. LPSS paragraph 4.3.22 states: 'There are a number of considerations to take account of when assessing whether a site is located within the village. This includes factors such as the pattern of development, and the proposed development's relationship to the built up area of the village and the surrounding countryside.'

LPSS Policy P2(c)(iii) – other villages

5.28 These villages are the smallest villages in the borough and their loose knit built nature militates against the drawing of a definitive settlement boundary. For this reason all development proposals located here will need to make a compelling case as to why, in that specific case, the site should be considered to be within the village for the purposes of this policy. LPSS paragraph 4.3.22 states: 'There are a number of considerations to take account of when assessing whether a site is located within the village. This includes factors such as the pattern of development, and the proposed development's relationship to the built up area of the village and the surrounding countryside.'

Is the proposal 'limited infilling'?

5.29 Once the decision maker is satisfied that the proposal is within a village, the second test is whether it comprises 'limited infilling'. Case law has established that what constitutes 'limited infilling' is essentially a question of fact and planning judgment. This was confirmed by the Court of Appeal[5] which said: 'The question of whether a particular proposed development is to be regarded as "limited infilling" in a village for the purposes of the policy in paragraph 89 [now 149] of the NPPF will always be essentially a question of fact and planning judgment for the planning decision-maker. There is no definition of "infilling" or "limited infilling" in the NPPF, nor any guidance there, to assist that exercise of planning judgment. It is left to the decision-maker to form a view, in the light of the specific facts. Can this proposed development be regarded as "limited infilling", or not, having regard to the nature and size of the development itself, the location of the application site and its relationship to other, existing development adjoining it, and adjacent to it? That is not the kind of question to which the court should put forward an answer of its own. Nor will it readily interfere with the decision-maker's own view.'

[5] R (on the application of Tate) v Northumberland CC [2018] EWCA Civ 1519

5.30 LPSS paragraph 4.3.23 provides some indication of what may be considered limited infilling however the ultimate judgement lies with the decision maker and is a matter of planning judgment based on the specific circumstances of the case. LPSS paragraph 4.3.23 states: 'Limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside or the local environment.'

5.31 It should however be noted that limited infilling is not restricted to new dwellings only and could include new buildings. It could also include other forms of development should a compelling case be made as to why, in that specific case, it should be considered as limited infilling for the purposes of this policy.

5.32 In arriving at a conclusion as to whether a proposal constitutes limited infilling, the decision maker must consider first, whether the proposal is 'infilling', and second whether that infilling can be considered to be 'limited'. To be considered 'infilling' a proposal must of necessity be located within a space or a gap between other buildings.

5.33 Whether a proposal can be considered to be 'limited' relates both to the size of the site and the scale of the proposed development. For example, a proposal for a limited number of homes which is located within what is considered to be a significant gap will not be considered to comprise 'limited infilling'.

5.34 It is important to stress that the process outlined simply leads to a decision as to whether the proposal should be considered to be not inappropriate in Green Belt terms. It does not automatically follow that planning permission will be granted. It is a first step after which any proposal will be judged against other planning policies to see whether it accords with the development plan as a whole, including requirements for high quality design. A poorly designed scheme that is not inappropriate in the Green Belt will still be refused. Please see Appendix 1 for a flow chart of the decision making process.

Limited affordable housing

5.35 NPPF paragraph 149(f) states one of the exceptions is 'limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)'.

5.36 This exception comprises proposals for rural exception sites that are delivered under LPSS Policy H3. This is affordable housing provided on small sites in rural areas on Green Belt land, as an exception to other planning policies including Green Belt policy. Such housing must be retained permanently for people who are current or former residents, or who have a family or employment connection to the parish.

5.37 The LPSS does not define what is considered to be 'limited' within the context of this exception. However, proposals need to be accompanied by a Rural Housing Needs Survey which identifies a local need for affordable housing. Proposals should therefore be relative to the scale of the need identified. The decision maker should also consider whether opportunities exist for the identified local need to access alternative affordable housing provision.

Previously developed land

5.38 NPPF paragraph 149(g) states one of the exceptions is 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

> – not have a greater impact on the openness of the Green Belt than the existing development; or
>
> – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'

5.39 The NPPF glossary defines the term 'previously developed land' as: 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape'.

5.40 An important aspect to note is the differential approach taken to open spaces (including gardens) in built up areas compared to those outside of built up areas. Open spaces such as those listed are not considered to comprise previously developed land in built up areas but are considered previously developed land outside of built up areas. Within the Green Belt, gardens within the identified settlement boundaries will be regarded as being in a built up area. Outside of these boundaries, whether an area is considered to be in a 'built-up' area will be a matter of planning judgement and will take into account factors such as the number of buildings, their density and the cohesion of the properties. For example, a small cluster of properties or a sparsely spread area of low density buildings is unlikely to be considered 'built-up'. Applicants are encouraged to engage in pre-application discussions for a more definitive view on a specific site.

5.41 It is important to note the differential test in relation to openness between the two limbs. The exception in limb one is restricted to those proposals that would not have a greater impact on the openness of the Green Belt than the existing development whilst the exception in limb two must not cause substantial harm to the openness of the Green Belt. For further guidance on the types of factors that will be assessed when considering the impact on openness, please see Section 6 below.

5.42 The second limb of this policy is only engaged for proposals that 'contribute to meeting an identified affordable housing need within the area of the local planning authority'. In order to meet this, proposals will need to demonstrate that there is a genuine local affordable housing need within that settlement/parish area which is unlikely to otherwise be met. Proposals should therefore reflect the scale of need identified and consider what opportunities exist for that identified local need to access alternative affordable housing provision. Unlike rural exception sites, proposals do not need to comprise of solely affordable housing, nor is the level of market homes restricted to that necessary to make the scheme viable. For that reason, the Council's normal affordable housing requirement of at least 40% will be applicable for all schemes.

Other exceptions

5.43 NPPF paragraph 150 goes on to state: 'Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

a. mineral extraction;
b. engineering operations;
c. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
d. the re-use of buildings provided that the buildings are of permanent and substantial construction;
e. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
f. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.'

5.44 For further guidance on the types of factors that will be assessed when considering the impact on openness, please see Section 6 below.

5.45 In relation to NPPF para 150(d), for a building to be of permanent and substantial construction it must have walls and a roof, be structurally sound and not require significant re-building, cladding or significant external alterations. It is also expected that it would not require any significant changes to its foundations or the main structural element of the building, for example a pole barn.

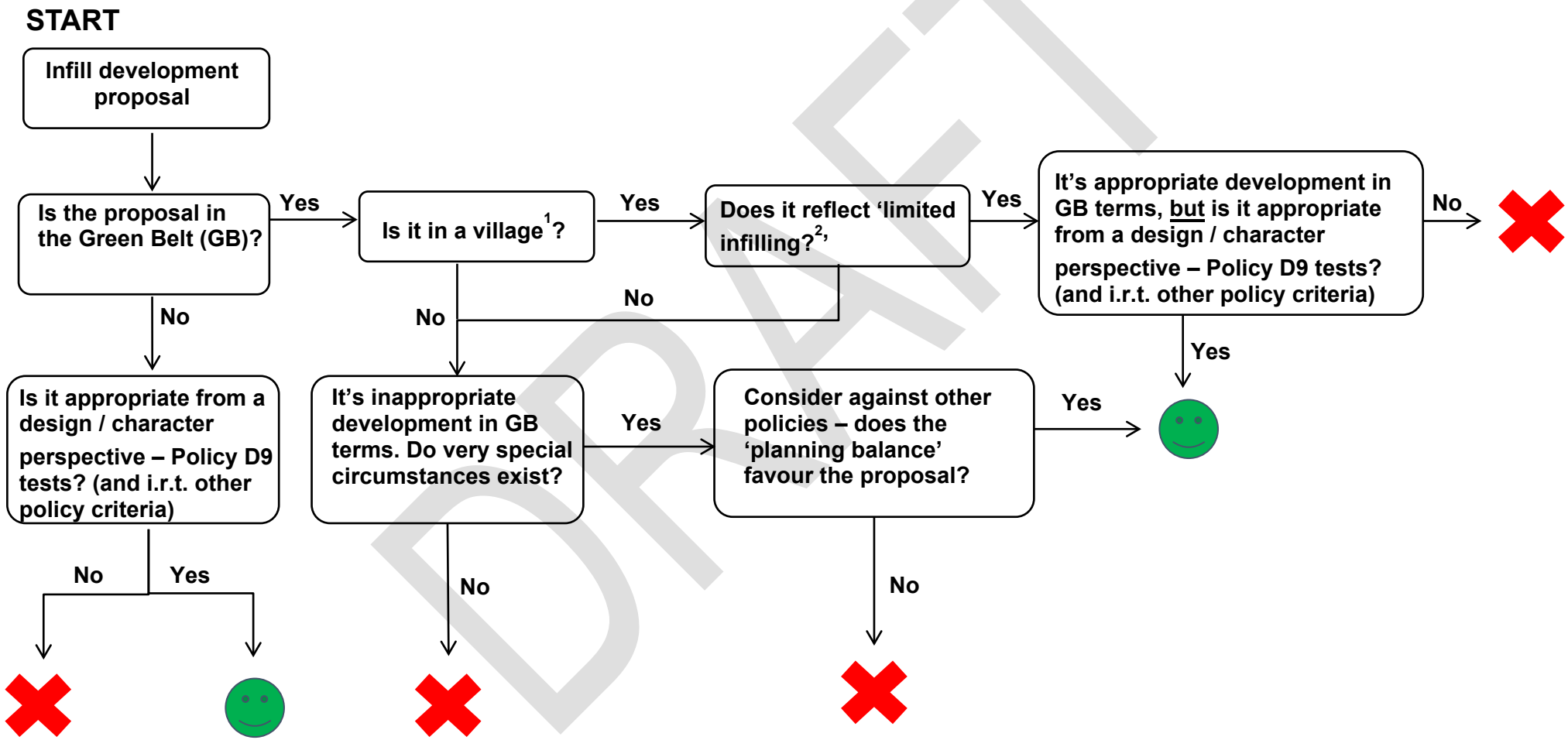
6. Openness

6.1 As set out in paragraph 137 of the NPPF, one of the essential characteristics of Green Belts is their openness. In considering the concept of openness, there are two dimensions; spatial and visual. This means that the absence of visual intrusion, or the presence of screening, does not in itself mean that there is no impact on the openness of the Green Belt as a result. Equally this does not mean that the openness of the Green Belt has no visual dimension. Instead, any assessment of the impact of a proposal on the openness of the Green Belt must include consideration of both the spatial aspect as well as the visual aspect.

6.2 Factors which would be considered as part of this assessment include the proposal's footprint, floorspace, volume, bulk, height, mass, positioning and visual prominence. Consideration will also be given to increased activity and general disturbance that would be caused by the development proposal. There is also likely to be an interplay between the various factors. For instance, redevelopment of a previously developed site might result in a greater overall footprint but has a lesser impact on the openness of the Green Belt if it rationalises the development on a smaller and more discrete area of the site. Conversely the redevelopment of one large building into numerous dwellings spread out across a site is likely to have a greater impact on the openness of the Green Belt even if it results in a smaller overall footprint of development. This example would also result in the introduction of boundary treatments (be they hard or soft) throughout the site and increased domestic activity with associated paraphernalia, such as vehicles and garden equipment. This would all have an impact on openness and would need to therefore be considered in the round.

Appendix 1

Proposals for infill development: decision- making flow diagram



1 See Local Plan Strategy and Sites – Policy P2(c)i-iii and para 4.3.22

2 See Local Plan Strategy and Sites – Policy P2(c)i-iii and para 4.3.23