



North East Derbyshire Local Plan

Issues & Options (Reg 18) Consultation Representations

Boningale Developments Limited

April 2026

Contents

1. Introduction.....	3
2. National Planning Policy Context.....	4
3. Strategic Approach to the Location of Development	7
Development Needs	7
Spatial Distribution of Development.....	9
Settlement Hierarchy	9
Sustainability Appraisal	10
4. Refined Schedule of Sites	13
Land North of Dronfield Woodhouse.....	13
Potential Dronfield Allocations	16
Other Potential Site Allocations.....	17
5. Conclusion	18

Appendix 1 – Strategic Concept Plan

Appendix 2 – Vision Document

Appendix 3 – Site Access Strategy

Appendix 4 – Traffic & Transport Appraisal

Appendix 5 – Grey Belt and Golden Rules Assessment

Appendix 6 – Landscape and Visual Technical Note

Appendix 7 – Heritage Note

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For and on behalf of Marrons			

1. Introduction

- 1.1. These representations have been prepared by Marrons on behalf of Boningale Developments Limited (the 'Client') in response to the North East Derbyshire (the 'Council') Issues and Options Consultation March 2026.
- 1.2. Born in the West Midlands, Boningale Developments Limited is family-owned and family run, supported by a handpicked team of professionals with decades of experience. Boningale Developments are the 'sister company' of Boningale Homes Limited, who specialise in delivering residential developments of various scales within the west of England.
- 1.3. Boningale Developments are promoting site 45160 - Land North of Dronfield Woodhouse, which is being considered for allocation. This site is sustainably located and is not subject to any constraints which are likely to significantly restrict its development and as such is suitable for development. We can confirm the site is available for development, with potential for housing to be delivered within the first five years of the plan period. Development of the site is achievable within no known impediments to its delivery. On this basis, and given the strong potential for the site to contribute to the delivery of sustainable development, the site is appropriate for allocation in the local plan.
- 1.4. To support the assessment of the Land North of Dronfield Woodhouse, and confirm its suitability for assessment, these representations are accompanied by:
 - Strategic Concept Plan by Marrons
 - Vision Document by Marrons
 - Grey Belt Assessment by Marrons
 - Traffic and Transport Appraisal by Marrons
 - Landscape & Visual Technical Report Technical Note by Pegasus
 - Heritage Appraisal by Pegasus
- 1.5. The proposed distribution of development is broadly appropriate, supporting growth in the most sustainable locations, however in accordance with national policy, it is important that a range of sites are considered for allocation. It is important that the plan also acknowledges that the LHN derived from the standard method is the minimum level of housing that should be planned for, and that a higher housing requirement should be considered, including to accommodate unmet need from neighbouring authorities.

2. National Planning Policy Context

2.1. The National Planning Policy Framework (the “Framework”), last revised December 2024, sets out that Government’s planning policies for England and how they should be applied (paragraph 1). The key policies that are relevant to the plan-making process and these representations are summarised below.

2.2. At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11). For plan-making, the presumption means:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

2.3. Paragraph 15 states that: *“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”*

2.4. Paragraph 16 requires plans to be prepared with the objective of contributing to the achievement of sustainable development, and it requires plans to be prepared positively in a way that is aspirational but deliverable.

2.5. Paragraph 20 stipulates that strategic policies should set out an overall strategy for the pattern, scale and design quality of places to make sufficient provision for (inter alia): housing (including affordable housing); employment; and, conservation and enhancement of the natural, built and historic environment.

- 2.6. Paragraph 22 confirms that *“strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”*
- 2.7. Paragraph 23 stipulates that strategic policies should provide a clear strategy for bringing sufficient land forward at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.8. Paragraphs 24 to 28 require Local Planning Authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and consider whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Statements of Common Ground should be prepared to document progress on addressing cross boundary matters.
- 2.9. Paragraph 32 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence.
- 2.10. Paragraph 32 states that: *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements¹⁸. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*
- 2.11. Paragraph 36 explains how “local plans and spatial development strategies will be assessed in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:
- a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²⁰; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

2.12. Paragraph 72 of the Framework requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and*
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.*

2.13. Paragraph 73 of the Framework then states small and medium sized sites can make an important contribution to meeting the housing requirement of an area.

2.14. Paragraph 77 of the Framework recognises the important contribution that larger scale development can make, stating that *the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.*

3. Strategic Approach to the Location of Development

Development Needs

Housing Need and the Housing Requirement

- 3.1. The consultation document sets out that options for considering housing needs have been considered, including below, at, and above the standard method, with the consultation based on a meeting “the overall housing target set by the standard method: 12,000 dwellings over the period 2024-2044”, or 600dpa.
- 3.2. It is important to emphasise that under national policy the figure generated by the standard method is not a target, but is the minimum local housing need that should be planned for, and that the local authority should consider whether there is a need to plan for a higher housing requirement.
- 3.3. Whilst the Council has previously sought to gauge public opinion about the level of housing that has been planned for, it is unclear whether it has sought to examine the evidence of whether it should plan for a higher housing number, in particular in relation to address unmet housing needs in the surrounding area, support the delivery of affordable housing to meet identified needs, and to support employment growth ambitions.
- 3.4. In relation to unmet housing need, the Council’s Housing Needs Assessment 2024 identifies the site as forming part of a housing market area with Chesterfield, Bolsover, and Bassetlaw, whilst also having strong connections with Sheffield, and South Yorkshire.
- 3.5. The Sheffield Local Plan is currently at examination, with the Local Plan Inspector’s indicating that subject to main modifications the plan is capable of being found sound. The draft plan however does not meet Sheffield’s LHN in full, with a proposed housing requirement of 2,236dpa against a current LHN of 2,429dpa, a shortfall of 193 dpa. In the most recent Duty to Cooperate evidence (SLP examination document EXAM 122), no neighbouring authorities have at this stage made an offer to meet any of Sheffield’s unmet needs.
- 3.6. There is potential for unmet housing needs to arise in the identified HMA:
 - Chesterfield Local Plan, adopted in July 2020 sets a housing requirement of 240dpa, against a current LHN of 501dpa. An initial consultation on a new local

plan last year highlighted that meeting housing needs in full is likely to be challenging.

- Bolsover Local Plan, adopted in March 2020, sets a housing requirement of 300dpa, against a minimum LHN of 360dpa. A new local plan will be prepared under the new plans system
- Bassetlaw Local Plan, adopted in May 2024, sets a housing requirement of 540dpa (including an uplift to support jobs growth), against a current LHN of 630dpa

3.7. As demonstrated by the above, these neighbouring authorities will all need to plan for an increase in housing delivery. For Chesterfield, as it is heavily urbanised, meeting housing needs in full is likely to be challenging.

3.8. Regardless of the fact that the statutory duty to cooperate is being removed, national policy is clear that local authorities must engage in effective and on-going joint working, to plan positively to address strategic issues, including meeting housing and other development needs. It is unclear at this stage what work the Council has done/is doing to fulfil this requirement. Given that unmet needs from Sheffield are likely to be confirmed shortly, given the close functional links between the two authorities, it is incumbent on the Council to identify whether it can make a contribution to meeting this need, including considering the allocation of sustainable sites on lower performing Green Belt land.

3.9. In relation to affordable housing, the Council's Housing Needs Assessment identifies that there is an acute need for affordable housing in the district, with a need for 290 affordable rented homes per annum and 66 affordable homes for ownership per annum, a total of 356dpa. This represents over 50% of the minimum LHN. Given the variation in values across the district, and associated challenges in securing a high proportion of affordable housing, the Council should given consideration to applying a higher overall housing requirement in order to meet the identified affordable housing need in the district.

3.10. More generally, an increase housing requirement can contribute to the delivery of sustainable development by supporting choice and competition in the market, ensure a resilient supply of housing and support employment and economic growth in the area. Taken together with the other factors discussed above, there is a clear justification that the Council should be planning for a higher housing requirement than the minimum local housing need derived from the standard method.

The Plan Period

- 3.11. We note that the consultation document sets out that the plan period covers the period 2024-2044
- 3.12. Local Plans should be forward facing, looking ahead to a minimum 15-year period from adoption. Planning Practice Guidance is clear that the assessment of local housing need should be kept under review, throughout the plan-making process, and that there is no need to take account of plans under-delivery of new homes, as this is accounted for by the affordability adjustment as part of the standard method for calculating minimum local housing needs. As such the plan period should start at the anticipated point of adoption, looking forward a minimum 15 years. Given the proposed inclusion of major strategic sites/ new settlements, in accordance with the NPPF, the plan should look ahead for a longer period.

Spatial Distribution of Development

- 3.13. The consultation document sets out that the Council has previously sought opinions on how development should be distributed, with responses generally supportive of focusing development around larger settlements, including the edges of Sheffield and Chesterfield.
- 3.14. The proposed approach aligns with this, setting out that development will be prioritised for the larger settlements, and potentially new settlements/strategic sites. This is supported by the Settlement Hierarchy Topic Paper which highlights the ability of the main towns to support the delivery of sustainable development.
- 3.15. Whilst we broadly agree with the proposed distribution of development, the plan should be forward looking – considering how development can maintain and enhance infrastructure provision, such as active travel and public transport links into Sheffield and Chesterfield. Furthermore, to support sustainable growth, the plan should make a distinction between sustainable edge of settlement locations, and isolated rural areas.

Settlement Hierarchy

- 3.16. The settlement hierarchy is based on the Council's Settlement Role & Function Study which makes a detailed quantitative assessment and ranking of the sustainability of settlements across the district, identifying Dronfield as the most sustainable settlement. We are broadly supportive of the settlement hierarchy, which is supported by the

evidence. We would note however that the settlement study represents a static assessment of the current sustainability of settlements, and would again highlight that in accordance with national policy, the plan should be forward looking, with a vision-led approach which identifies opportunities for growth to contribute to the sustainability of settlements across the district.

Sustainability Appraisal

- 3.17. A Sustainability Appraisal (SA) addendum has been published as part of the consultation, which assesses a series of sites which have been identified through the LAA process. The SA uses a primarily quantitative assessment of sites against SA objectives, looking at a number of relevant data points to come to a conclusion about the likely environmental effects of each site. The overall assessment of a site against each objective is based on the lowest score, with the intention that this applies the precautionary principle.
- 3.18. Whilst the scoring criteria are broadly reasonable, the approach to overall assessment lacks nuance given the binary nature of many of the assessment criteria, meaning for example a site marginally exceeding a proximity threshold against one criterion will determine its overall scoring against that objective. This effect is compounded by the harsh scoring of some criteria, meaning sites over 5km from a hospital will be scored negatively regardless of their performance against the other seven scoring criteria for the health objective. A more nuanced approach, such as a weighted scoring system, is less likely to be subject to such distortions.
- 3.19. Regardless, there appear to be a number of errors in the assessment of site 45160 – Land North of Dronfield Woodhouse which result in the site being scored negatively against some objective criteria. Commentary on the scoring is contained in table 1 below.

Table 1: SA Scoring Commentary

SA Objective	SA Score	Comment
Biodiversity & geodiversity	+/-	
Landscape	-	The LAA states that in “the wider landscape the site is well contained by virtue of the local topography and intervening vegetation particularly from the local road network ...there are no significant landscape

SA Objective	SA Score	Comment
		constraints affecting the land, and the area is surprisingly well contained visually.” Strategic landscape mitigation is proposed, including planting along the northern boundary. Once mitigation is considered at the regulation 19 stage, the overall likely effect in relation to objective 2 is likely to be neutral (0).
Cultural Heritage	-	The nearest listed building is over 200m away, screened by established development. Rising ground to the north will screen the site from listed buildings 400m+ north of the site. There are no other designated heritage assets within close proximity of the site. The overall likely effect in relation to objective 3 is likely to be neutral (0).
Air	0	
Water	0	
Natural resources & waste	-	
Climate change mitigation	+/-	
Climate change adaptation	+	
Sustainable communities	-	The site is within 1km of a primary school, within 2km of a secondary school and FE facility, within 800m of a convenience store, within 2km of a town centre, and as such the overall likely effect in relation to objective 9 is likely to be positive (+).
Economy	+	
Health	-	The site is within 1km of a GP surgery, dentist, pharmacy, within 2km of a leisure centre, is within walking distance of greenspace, has direct access to PROW, and will deliver on-site green space. The overall effect in relation to objective 11 is likely to be positive (+).
Transport	-	The site is within 400m of bus stops providing a regular service to Sheffield and Chesterfield, and is within 2km of a railway

SA Objective	SA Score	Comment
		station and as such the overall likely effect in relation to objective 12 is likely to be positive.
Housing & equality	++	

3.20. As a point of clarification, the SA states that there are no further education facilities within NED. However secondary schools such as Henry Fanshawe School in Dronfield offer further education (post-16/level 3) courses. It is unclear if this is an omission in the data used, or if the criteria is intended to refer to higher education (post-18/level 4+) facilities. In the case of the latter, as HE students will often stay in student accommodation during term time and/or have limited in-person contact hours, and therefore there is a reduced need to commute compared to what is typical for other forms of education or employment, and as such a higher proximity threshold should be applied.

4. Refined Schedule of Sites

Land North of Dronfield Woodhouse

- 4.1. We can confirm this site is suitable for development, is available, and development is achievable. As such this site is suitable for allocation.

Site Capacity

- 4.2. The consultation suggests the site has capacity for approximately 190 dwellings, *“based on prevailing neighbouring densities, and a 20% density uplift for towns and cities.”*
- 4.3. National policy sets out that planning policies should promote efficient use of land, taking account of housing and infrastructure needs, market conditions, local character, and good design.
- 4.4. Reflecting national policy, a design-led approach to density is proposed, as illustrated on the concept plan prepared by Marrons included at Appendix 1. This demonstrates how the site can deliver a high-quality development which reflects features of well-designed places. The proposed layout responds to site context, with a strong green buffer along the northern site boundary, whilst existing trees and hedgerows will be retained and enhanced. A legible layout ensures the site is accessible and easy to move around, and supports access to the wider countryside. Green space include area for play and recreation to promote a social, healthy, and well-integrated community. It is anticipated that the site can deliver approximately 250 dwellings, with a net density of approximately 35dph.

Green Belt

- 4.5. The most recent published Green Belt Study dates from 2016/2017 and does not reflect up-to-date guidance. This study assessed the site as part of a parcel which was assessed as ‘robustly’ meeting purposes a, b, and c, not meeting purpose d, and partially meeting purpose e. Pegasus have undertaken an assessment of the site’s contribution to the Green Belt. This assesses that the site:
- Represents 0.11% of the Green Belt within North East Derbyshire
 - Makes a ‘moderate’ contribution to purpose a,
 - Makes a ‘weak’ to ‘moderate contribution to purpose b,

- Makes 'no contribution' to purpose d,
- There are no footnote 7 policies which provides a strong reason for restricting development

4.6. As such the site meets the definition of Grey Belt as set out in national policy.

4.7. Marrons have also undertaken a Grey Belt Assessment, which accompanies these representations. In summary, this assesses:

- The site does not contribute strongly to any of purposes a, b, or d
- no footnote 7 policies provide a strong reason for restricting development
- Development of the site would not undermine the purposes of the remaining Green Belt across the plan area
- There is a demonstrable unmet need for housing in the district
- The development is in a sustainable location
- The development will meet the 'Golden Rules'

4.8. On the basis of the above the site should be considered Grey Belt land, its development would not be inappropriate, and as such is suitable for allocation to meet identified housing needs.

Landscape

4.9. The site is not within a National Landscape or subject to any local landscape designations. The Landscape Technical Report produced by Pegasus sets out that the site is not subject to any national landscape designations, and does not constitute a valued landscape. The site is assessed as having medium landscape value, with a medium sensitivity to change. The site is well contained by landform, existing development, and established planting.

4.10. The Pegasus report also notes that the site is barely perceptible from the Peak District National Park and will be seen in the context of existing urban development.

Ecology & Trees

4.11. The site is not within or close to any designated wildlife sites, with the nearest site being Totley Wood which is approximately 2km to the north. The LAA identifies that one of the fields within the site has previously been identified as supporting grassland of interest, however an initial site walkover does not appear to indicate any significant value, with the site comprising intensively managed agricultural land. A preliminary

ecological appraisal will be undertaken to support any formal planning application, together with any necessary species surveys.

Highways & Access

- 4.12. Marrons Transport team have undertaken an initial transport appraisal and produced a site access strategy. Vehicular access to the site is proposed from Barnes Lane, which is proposed to be widened to allow two vehicles to pass, together with a pedestrian footway on either side. The eastern side of the access could accommodate a 3m shared footway/cycleway, and access to Barnes Farm would be retained.
- 4.13. The existing Public Rights of Way through the site would be retained ensuring permeability with Dronfield Woodhouse, and providing connectivity into the countryside towards Sheffield. The site can also deliver improvements to pedestrian and cycle infrastructure in the vicinity of the site.
- 4.14. In terms of trip generation, a development of up to 250 dwellings is expected to generate up to 133 to-way vehicle movements in a peak period. A detailed assessment of transport impacts will be undertaken to support any planning application.

Heritage and Archaeology

- 4.15. An initial heritage appraisal has been undertaken by Pegasus. The site is separated from the historic core of Dronfield Woodhouse by well-established residential development, limiting the potential for development of the site to impact the setting of nearby built heritage assets. The LAA identifies Barnes Farm as having some archaeological potential, however the evidence for this is limited and any evidence of earlier activity is likely to be centred outside of the site. A detailed heritage assessment will be undertaken to support any future planning application, which will consider the potential impact of the development on any heritage assets, including any archaeological remains within the site. There is no indication at this stage that heritage is likely to be a constraint on development of the site.

Flood Risk and Drainage

- 4.16. The site is wholly within flood zone 1 where there is a low risk of fluvial flooding. Limited parts of the site along the southern boundary of the site are indicated by Environment Agency mapping, however these are not expected to be a significant

constrain on development. A flood risk assessment and outline drainage strategy will accompany any future application.

Soil and Ground Conditions

- 4.17. Provisional Agricultural Land Classification mapping indicates that areas to the north and West of Dronfield are potentially Grade 3 agricultural land, although this mapping does not distinguish between Grade 3a (BMV) and 3b (non-BMV). No site specific post-1988 ALC surveys have been undertaken in the local area. Grade 3 land is relatively abundant in the district.
- 4.18. The site is within a coal authority development high risk area, due to historic mining activity in the surrounding area. A geoenvironmental and geotechnical assessment, will be undertaken to support any application. It is not anticipated the historic coal mining is likely to significantly constrain development of the site.

Potential Dronfield Allocations

- 4.19. Dronfield is the most sustainable settlement in the district, and is an appropriate location to direct growth, including edge of settlement sites. It is important however that sites which are proposed for allocation are deliverable, and that the level of development proposed is realistic. On this basis, at this stage there are potential issues with the deliverability of some sites which need to be addressed:
- Land at Stubley Lane (45218) contains a number of trees subject to TPOs and appears to have potential ecological value, which may restrict its ability to deliver the level of development proposed.
 - Land at Holmley Common (45228) has heritage and archaeological potential, as well as containing areas at risk of flooding, and appears to have potential ecological value, all of which may restrict its ability to deliver the level of development proposed.
 - Land off Highgate Lane (45251) does not currently have any suitable access to accommodate the scale of development proposed, and it is unclear if suitable access can be achieved.

- Land at Manor Bungalows (45384) is within a Conservation Area and contains a number of mature trees, and it is unclear whether it can feasibly deliver the proposed uplift in development.

Other Potential Site Allocations

4.20. Outside of Dronfield, whilst we are broadly supportive of the proposed development strategy, it is essential in order to have confidence that the plan will meet identified housing needs that all sites proposed for allocation are supported by proportionate evidence to ensure estimates of their site capacity are realistic, and there is reasonable confidence that they can feasibly be delivered. It is unclear that a robust assessment of sites has been undertaken at this stage, with many sites subject to a number of constraints which may limit their capacity, or even undermine their suitability for allocation.

4.21. For example, a strategic site for up to 3,000 dwellings is proposed at Duckmorton Moor, which would be a significant component of housing supply. National policy recognises the contribution large scale development such as new settlements can make to housing supply, however this site is subject to a number of potential constraints. Significant parts of the site appear to have potential ecological value, whilst former mining activity is likely to add abnormal costs and increase the timescale and complexity of housing delivery on site. Landscape, heritage, and flood risk may also constrain the development potential of the site.

4.22. These issues will need to be explored further if this site is to be allocated and relied upon to contribute the Council's housing land supply. It should also be noted that although national policy promotes how large-scale sites such as new settlements can make a significant contribution to housing supply, there will typically be a significant period between allocation and the commencement of housing delivery, particularly where significant infrastructure or remediation works are required. As such a site such as this will typically only contribute later on in the plan period. Therefore it is important that estimates of how many dwellings such sites will deliver within the plan period are realistic, and that a mix of small and medium sites are allocated to sustain supply in the early years of the plan.

5. Conclusion

- 5.1. Boningale Developments are promoting site 45160 - Land North of Dronfield Woodhouse, which is being considered for allocation. This site is sustainably located and is not subject to any constraints which are likely to significantly restrict its development and as such is suitable for development. This conclusion is supported by initial technical work undertaken by the project team, which accompanies these submissions.
- 5.2. We can confirm the site is available for development, with potential for housing to be delivered within the first five years of the plan period. Development of the site is achievable within no known impediments to its delivery. On this basis, and given the strong potential for the site to contribute to the delivery of sustainable development, the site is appropriate for allocation in the local plan.
- 5.3. The proposed distribution of development is broadly appropriate, supporting growth in the most sustainable locations, however in accordance with national policy, it is important that a range of sites are considered for allocation. It is important that the plan also acknowledges that the LHN derived from the standard method is the minimum level of housing that should be planned for, and there is a clear justification to consider a higher housing requirement, including to accommodate unmet need from neighbouring authorities.



Marrons



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DESIGN
GROUP** RECOGNISED
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