

CRASTER NEIGHBOURHOOD DEVELOPMENT PLAN

Submission Draft Version

**A report to Northumberland County Council
into the examination of the
Craster Neighbourhood Development Plan
by Independent Examiner, Rosemary Kidd**

Rosemary Kidd, Dip TP, MRTPI

NPIERS Independent Examiner

30 October 2020

Contents:

	Page
1 Summary	3
2 Introduction	4
3 The Neighbourhood Plan - as a Whole	13
The Neighbourhood Plan - Policies	13
4 Referendum	15
5 Background Documents	16
6 Summary of Recommendation	17

1.0 Summary

- 1.1 The Craster Neighbourhood Plan has been prepared to set out the community's wishes for the village of Craster.
- 1.2 I would like to congratulate the plan makers for a focused and succinct plan that addresses a growing issue being faced by the community. The few modifications recommended have already been agreed by the Parish Council in conjunction with the County Council.
- 1.3 The main recommendations concern:
 - Clarification of the wording of policies.
- 1.4 Subject to the recommended modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Craster Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

Background Context

- 2.1 This report sets out the findings of the examination into the Craster Neighbourhood Plan.
- 2.2 The parish of Craster lies within the Northumberland Coast Area of Outstanding Natural Beauty (AONB); a nationally important landscape. The parish lies midway along the Northumberland coast and has a history as an important fishing village, with tightly knit buildings clustered around a small sheltered harbour.
- 2.3 The attractiveness of the area has resulted in a significant increase in people visiting and staying in the AONB. The AONB management plan explains that the use of housing as second and holiday homes is having a significant detrimental effect on many of the small villages in the AONB by increasing house prices and reducing the availability of housing for local people.
- 2.4 At 2011 there were 305 residents in the parish, living in 245 households. Across the parish 39.2% of dwellings had no usual residents, an increase of 13% from 26.2% in 2001. Council tax records from April 2016, identify that 55 homes were second homes, this equates to 28.4% of the housing stock. Non domestic rates information published by the County Council in November 2019 identifies that 44 properties within the parish were registered as self-catering holiday units.

Appointment of the Independent Examiner

- 2.5 I was appointed as an independent examiner to conduct the examination on the Craster Neighbourhood Development Plan (CNP) by Northumberland County Council with the consent of Craster Parish Council in July 2020. I do not have any interest in any land that may be affected by the CNP nor do I have any professional commissions in the area currently and I possess appropriate qualifications and experience. I am a Member of the Royal Town Planning Institute with over 30 years' experience in local authorities preparing Local Plans and associated policies.

Role of the Independent Examiner

- 2.6 As an independent Examiner, I am required to determine, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether the legislative requirements are met:
 - The Neighbourhood Development Plan has been prepared and submitted for examination by a qualifying body as defined in Section 61F of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;

- The Neighbourhood Development Plan has been prepared for an area that has been designated under Section 61G of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
- The Neighbourhood Development Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004, that is the Plan must specify the period to which it has effect, must not include provisions relating to 'excluded development', and must not relate to more than one Neighbourhood Area; and
- The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A.

2.7 An Independent Examiner must consider whether a neighbourhood plan meets the "Basic Conditions". The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:

1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended by the Conservation of Habitats and Species and Planning (various Amendments) Regulations 2018) sets out a further Basic Condition in addition to those set out in the primary legislation: that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.8 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to comment on how the plan could be improved but rather to focus on whether the submitted Neighbourhood Plan meets the Basic Conditions and Convention rights, and the other statutory requirements.

- 2.9 It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings. I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the Basic Conditions and the other requirements.

The Examination Process

- 2.10 The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case. I am satisfied that no matters have been raised that require me to ask for a hearing.
- 2.11 I had before me background evidence to the plan which has assisted me in understanding the background to the matters raised in the Neighbourhood Plan. I have considered the documents set out in Section 5 of this report in addition to the Submission draft of the CNP dated March 2020.
- 2.12 I have considered the Basic Conditions Statement and the Consultation Statement as well as the Screening Opinions for the Strategic Environmental Assessment and the Habitats Regulation Assessment. In my assessment of each policy I have commented on how the policy has had regard to national policies and advice and whether the policy is in general conformity with relevant strategic policies, as appropriate.

Legislative Requirements

- 2.13 The neighbourhood plan making process has been led by Craster Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process.
- 2.14 The Basic Conditions Statement confirms that the Neighbourhood Plan area is co-terminus with the parish of Craster and that the area was designated by Northumberland County Council on 29 January 2019 as a Neighbourhood Area. The Parish Council has confirmed that there are no other neighbourhood plans relating to that area.
- 2.15 A neighbourhood plan must specify the period during which it is to have effect. The Basic Conditions statement states that the plan covers the period from adoption to 2036. The Plan itself does not state its life. It would be helpful to plan users if this was shown on the front cover. I have made a recommendation to this effect.
- 2.16 The Plan does not include provision for any excluded development: county matters (mineral extraction and waste development), nationally significant infrastructure or any matters set out in Section 61K of the Town and Country Planning Act 1990.

- 2.17 The Neighbourhood Development Plan should only contain policies relating to the development and use of land. The CNP policy is compliant with this requirement.
- 2.18 The Basic Conditions Statement confirms the above points and I am satisfied therefore that the CNP satisfies all the legal requirements set out in paragraph 2.4 above.

Recommendation 1: Show the date of the Plan on the front cover.

The Basic Conditions

Basic Condition 1 – Has regard to National Policy

- 2.19 The first Basic Condition is for the neighbourhood plan “*to have regard to national policies and advice contained in guidance issued by the Secretary of State*”. The requirement to determine whether it is appropriate that the plan is made includes the words “*having regard to*”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be “*consistent with national policy*”.
- 2.20 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan “*must not constrain the delivery of important national policy objectives.*”
- 2.21 In considering the policy contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:
- “Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”*
- 2.22 The NPPF of February 2019 (as amended) is referred to in this examination in accordance with paragraph 214 of Appendix 1, as the plan was submitted to the Council after 24 January 2019.
- 2.23 The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic policies set out in the Local Plan or spatial development strategy and should shape and direct development that is outside of those strategic policies*” and further states that “*A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum, the neighbourhood plan becomes part of the statutory development plan.*”

- 2.24 Table 1 of the Basic Conditions Statement includes comments on how the policy of the CNP have had regard to relevant paragraphs of the NPPF. Paragraph 78 of the NPPF states that *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.
- 2.25 The NPPG states that: *“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.”* Paragraph: 009 Reference ID: 67-009-20190722.
- 2.26 I have reviewed the CNP Housing Background Paper dated December 2019. I consider that it sets out proportionate, robust evidence to support the policy in the Plan to restrict the occupancy of housing and meets national planning guidance in that respect. I am satisfied that the CNP has had regard to national planning policy and guidance.

Basic Condition 2 - Contributes to sustainable development

- 2.27 A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The NPPF as a whole constitutes the Government’s view of what sustainable development means in practice for planning. The NPPF explains that there are three dimensions to sustainable development: economic, social and environmental.
- 2.28 Section 3 of the Basic Conditions Statement sets out how the CNP contributes towards the delivery of the social objective of sustainable development by seeking to resist any further loss of population thereby increasing the sense of community and supporting local services and facilities.
- 2.29 I am satisfied that the Plan contributes to the delivery of the social objective of sustainable development and therefore meets this Basic Condition.

Basic Condition 3 – is in general conformity with strategic policies in the development plan

- 2.30 The third Basic Condition is for the neighbourhood plan to be in general conformity with the strategic policies contained in the Development Plan for the area. The adopted Development Plan relevant to the area comprises the Alnwick District Local Development Framework, Core Strategy Development Plan Document 2007 (ADCS); and the Alnwick District Wide Local Plan 1997 (ADLP).
- 2.31 Table 2 of the Basic Conditions Statement sets out the way that the Neighbourhood Plan conforms to the relevant strategic planning policies in the Core Strategy.
- 2.32 Whilst the 2007 ADCS acknowledged the growing demand and impact of second and holiday homes across the former Alnwick District, it did not

include a specific policy to seek to manage future development. Instead it sought to increase the provision of affordable housing.

- 2.33 Policy S1: location and scale of new development (strategic policy) identifies Craster as a 'local needs centre', which is a settlement with limited services, or which are peripherally located in relation to employment and transport. Development in Craster is therefore currently restricted to that which satisfies local needs only.
- 2.34 Policy S10: tourism development (strategic policy) seeks to focus new cultural and tourism development within or adjacent to rural service centres, sustainable village centres and local needs centres. This policy seeks to ensure that new tourism development will avoid an adverse impact on the well-being of communities.
- 2.35 The 1997 ADLP does not refer to the pressures created by second and holiday homes. Policy H13 allows restrictive occupancy conditions to be removed where there is no longer a need for the restriction. However, this is a non-strategic policy and the plan makers consider it to be in conflict with current national policy and guidance.
- 2.36 Northumberland County Council is preparing a new local plan which, once adopted, will replace the existing and saved planning policies of the former district council. The Northumberland Local Plan (NLP) was submitted to the Secretary of State for Housing, Communities and Local Government in May 2019 and is now undergoing examination.
- 2.37 The NLP highlights the issue of the impact of the increasing numbers of second and holiday homes in the county, explaining that the prevalence is most stark along the north Northumberland Coast. The NLP acknowledges that second and holiday homes do provide some economic benefits. However, it is stated that the lack of permanent occupation of properties is having an adverse impact on the social fabric of affected communities, resulting in diminished support and demand for local facilities and schools.
- 2.38 CNP Policy 1 reflects the wording of NLP Policy HOU10: second and holiday homes (non-strategic policy). The emerging NLP policy seeks to restrict the occupancy of new market dwellings in parishes where 20% or more of household spaces are identified as having no permanent residents. It will require a principal residency restriction to be applied and secured through a section 106 legal agreement.
- 2.39 The adopted development plan policies recognise the growing concerns about the impact of second and holiday homes on the social fabric of the communities across the former Alnwick District. The concerns have grown since the ADCS was adopted and the emerging NLP includes a specific policy on the subject which the policy in the CNP seeks to reflect.

- 2.40 I am satisfied that the CNP policy conforms with the adopted development plan policies and has been prepared to accord with emerging Local Plan policy.

Basic Condition 4 – Compatible with EU obligations and human rights requirements

- 2.41 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.

- 2.42 Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination from the responsible authority (Northumberland County Council) that the plan is not likely to have “significant effects.”

- 2.43 A screening opinion carried out by Northumberland County Council in February 2020 concluded:

*“In the opinion of Northumberland County Council, having regard to the criteria set out in Schedule 1 of the SEA Regulations, Craster Neighbourhood Plan is **unlikely to have any significant positive or negative effects** on the environment. Therefore Strategic Environmental Assessment is NOT required for the Craster Neighbourhood Plan for the following reason:*

“The Plan covers a relatively small rural area and does not allocate sites for development or expressly support further development in the Craster Neighbourhood Area. Accordingly, significant positive or negative effects on the environment are considered unlikely to arise as a result of the introduction and implementation of the Neighbourhood Plan.

- 2.44 Consultation was carried out with the statutory environmental bodies on the SEA screening opinion in February 2020. All agreed with the screening opinion.

- 2.45 The Habitat Regulations Assessment (HRA) screening report (March 2020) concluded in paragraph 6.3 that:

“In accordance with Regulation 106 of the Conservation of Habitats and Species Regulations 2017 as amended, Northumberland County Council concludes that the Craster Parish Neighbourhood Plan Pre-Submission Version (March 2020) is unlikely to have a significant effect on any European sites and therefore it is unnecessary to undertake an appropriate assessment prior to the adoption of the Plan.”

- 2.46 Consultation on the HRA screening assessment was carried out in May 2020. Natural England commented that they concurred with the findings of the conclusion.

- 2.47 I am satisfied that the SEA and HRA screening opinions have been carried out in accordance with the legal requirements.
- 2.48 The Basic Conditions Statement considers the impact of the Plan on Human Rights and concludes in paragraph 5.1 that: *“Throughout the preparation of the CNP emphasis has been placed to ensure that no sections of the community have been isolated or excluded. The CNP is fully compliant with the requirements of the European Convention on Human Rights. There is no discrimination stated or implied, nor any threat to the fundamental rights guaranteed under the convention.”*
- 2.49 From my review of the Consultation Statement, I have concluded that the consultation on the CNP has had appropriate regard to Human Rights.
- 2.50 I am not aware of any other European Directives which apply to this particular Neighbourhood Plan and no representations at pre or post-submission stage have drawn any others to my attention. Taking all of the above into account, I am satisfied that the CNP is compatible with EU obligations and therefore with Basic Conditions Nos 4 and 5.

Consultation on the Neighbourhood Plan

- 2.51 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.52 The key stages of consultation on the preparation of CNP were:
1. The Parish Council undertook a parish survey, which was sent to all residential properties in August 2019. The survey sought views on the proposed approach of the neighbourhood plan to limit any new build development within the parish to that which would be permanently occupied.
 2. Eleven responses were received to the survey all but one of which supported the approach to introduce a principal residency restriction. The survey indicated that residents who responded have concerns regarding the impact of second homes on the vitality of their community and agree with the proposed approach to introduce a principal residency restriction to any new development.
 3. Consultation on the Pre-Submission Draft CNP took place between 27 January 2020 and 9 March 2020. Publicity was carried out by:
 - a) A public notice was displayed in Craster Memorial Hall and on the community notice boards in Craster and Dunstan;
 - b) A notification email/ letter was set to the consultation bodies;
 - c) Copies of the draft plan were available at Craster Memorial Hall during normal opening hours;
 - d) The draft plan and supporting documents was available online; and
 - e) A drop-in event was held on 8 February 2020 at Craster Memorial Hall, where copies of the plan were available to view. The event was attended by approximately 50 people

- 2.53 Responses to the pre-submission consultation were received from: 5 organisations and 42 local residents.
- 2.54 Consultation on the Submission draft CNP was carried out by Northumberland County Council between 6 August and 2 October 2020. Eight responses were received; only that from Northumberland County Council made comments on the Plan.
- 2.55 It is clear from the evidence presented to me in the Consultation Statement, that extensive consultation has been carried out during the preparation of the CNP.
- 2.56 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14, 15 and 16 in the Neighbourhood Planning (General) Regulations 2012.
- 2.57 This report is the outcome of my examination of the Submission Draft Version of the CNP. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

3.0 Neighbourhood Plan – As a whole

- 3.1 Basic Condition 1 requires that the examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State. Before considering the policy in detail, I have considered whether the plan as a whole has had regard to national planning policies and supports the delivery of sustainable development.
- 3.2 The PPG states that “*a policy should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area*”. I will consider this requirement as I examine each policy.
- 3.3 The CNP contains one policy on managing second and holiday homes. The Plan is concise and focuses solely on the policy and supporting text. The introductory text concisely describes the area and the evidence to justify the policy.
- 3.4 The policy is clearly distinguishable from the supporting text by being presented in a box.
- 3.5 The Plan contains a map of the plan area but no Policies Map.
- 3.6 Where modifications are recommended, they are presented and clearly marked as such and highlighted in bold print, with any proposed new wording in italics.

The Neighbourhood Plan

Vision

- 3.7 Section 3 of the Plan contains a succinct vision statement which is implemented in the Plan's single policy:

“By 2036 Craster Parish will contain a mix of housing that meets the needs of a revitalised local community. New residential developments will be permanently occupied by residents.”

Policy 1 Managing second and holiday homes

- 3.8 The policy gives support for new housing, excluding replacement dwellings, where first and future occupation is limited to use only as a principal residence. New homes will not be supported.
- 3.9 The definition of principal residence is included in the second paragraph of the policy. It also explains how the restriction is to be secured and monitored.

- 3.10 NCC has made a representation setting out revisions to clarify the wording of the policy and to rename it “Principal Residence Housing”.
- 3.11 The Parish Council has confirmed that they are satisfied with the proposed revisions.
- 3.12 I am therefore recommending that the policy be revised in accordance with the representation submitted by NCC to ensure that it can be interpreted consistently by decision makers. Consequential amendments are recommended to paragraph 4.3 of the Plan.
- 3.13 Paragraph 4.3 of the CNP states that the policy requires “all new housing to be restricted”. However to ensure clarity for plan users, it is considered that it would be helpful to state that the policy applies throughout the parish.

Recommendation 2: Revise Policy 1 as follows:

Revise the title to: *Principal Residence Housing*

Revise the first paragraph to read:

“Throughout the parish of Craster, new housing, excluding replacement dwellings, will only be supported where occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a principal residence. New second homes will not be supported. “

Divide second paragraph into two:

“A principal residence is that which is occupied as the sole or main home of the occupants and where they spend the majority of their time when not working away from home.

Start a new paragraph: “The restriction will be secured through a planning condition or, if necessary, through a planning obligation secured under section 106 of the Town and Country Planning Act 1990, or any subsequent successor legislation.”

Revise the final paragraph to read:

“The occupier will be required to provide evidence that they are meeting the terms of the occupation restriction whenever requested to do so by Northumberland County Council.”

Revise paragraph 4.3 to read: “Policy 1 is to be applied throughout the plan area. It requires all new housing to be subject to an occupation restriction to be applied in perpetuity so that the dwelling is only occupied as a principal residence. The development of new dwellings without this occupation restriction will not be supported. The policy defines.....from home.”

4.0 Referendum

- 4.1 The Craster Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of the community.
- 4.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the Basic Conditions namely:
- has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies contained in the Development Plan for the area; and
 - does not breach, and is otherwise compatible with, EU obligations and human rights requirements.
- 4.3 **I am pleased to recommend to Northumberland County Council that the Craster Neighbourhood Development Plan should, subject to the modifications I have put forward, proceed to referendum.**
- 4.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area designated by Northumberland County Council on 29 January 2019.

5.0 Background Documents

5.1 In undertaking this examination, I have considered the following documents

- Craster Neighbourhood Plan Submission Draft Version 2020 - 2036
- Craster Neighbourhood Plan Basic Conditions Statement March 2020
- Craster Neighbourhood Plan SEA Screening Opinion February 2020
- Craster Neighbourhood Plan HRA Screening Opinion March 2020
- Craster Neighbourhood Plan Consultation Statement March 2020
- National Planning Policy Framework 2019 (as amended)
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Alnwick District Core Strategy 2007 (ADCS)
- Saved policies of the Alnwick District Local Plan 1997 (ADLP)
- Northumberland Local Plan Submission Draft May 2019
- Craster Neighbourhood Plan Housing Background Paper December 2019

6.0 Summary of Recommendations

Recommendation 1: Show the date of the Plan on the front cover.

Recommendation 2: Revise Policy 1 as follows:

Revise the title to: *Principal Residence Housing*

Revise the first paragraph to read:

“Throughout the parish of Craster, new housing, excluding replacement dwellings, will only be supported where occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a principal residence. New second homes will not be supported. “

Divide second paragraph into two:

“A principal residence is that which is occupied as the sole or main home of the occupants and where they spend the majority of their time when not working away from home.

(Start a new paragraph): “The restriction will be secured through a planning condition or, if necessary, through a planning obligation secured under section 106 of the Town and Country Planning Act 1990, or any subsequent successor legislation.”

Revise the final paragraph to read:

“The occupier will be required to provide evidence that they are meeting the terms of the occupation restriction whenever requested to do so by Northumberland County Council.”

Revise paragraph 4.3 to read: “Policy 1 is to be applied throughout the plan area. It requires all new housing to be subject to an occupation restriction to be applied in perpetuity so that the dwelling is only occupied as a principal residence. The development of new dwellings without this occupation restriction will not be supported. The policy defines.....from home.”