



Report on Harden Village Neighbourhood Plan 2021 – 2030

An Examination undertaken for the City of Bradford Metropolitan District Council with the support of Harden Village Council on the submission version of the Plan.

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Main Findings - Executive Summary

From my examination of the Harden Village Neighbourhood Plan (the Plan) and its supporting documentation, including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Harden Village Council;
- the Plan has been prepared for an area properly designated – Harden Neighbourhood Plan area (figure on Page 7 of the Plan);
- the Plan specifies the period to which it is to take effect – 2021 to 2030; and
- the policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Harden Village Neighbourhood Plan 2021 - 2030

- 1.1 Harden is a village and civil parish in Yorkshire run at parish level by Harden Village Council. It falls within the City of Bradford Metropolitan District Council, Bradford being sited some 10km away to the southeast. The village is centred on the B6429 between Cullingworth, 2km to the southwest, and Bingley, a similar distance to the northeast. There are extensive areas of moorland and other open land within the parish particularly to the north of the village.
- 1.2 Harden was designated as a neighbourhood area by Bradford Council in August 2017. The following plan preparation involved informing exercises, engagement exercises and consultation exercises. The submitted Plan represents several years of work by those involved. It includes a broad vision, 10 aims and objectives and 22 policies under six topic headings.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Harden Village Neighbourhood Plan by

the City of Bradford Metropolitan District Council with the agreement of Harden Village Council.

- 1.4 I am a chartered town planner and former government Planning Inspector with over forty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- Whether the plan meets the Basic Conditions;
 - Whether the plan complies with provisions under Section 38A and Section 38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
 - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ("the 2012 Regulations").

- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.8 The “Basic Conditions” are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan for the area;
 - be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
 - meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires 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

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of the Metropolitan District of Bradford, not including documents relating to excluded minerals and waste development, includes the Bradford Core Strategy Development Plan Document (adopted July 2017) and saved policies from the Replacement Unitary Development Plan (July 2020 Schedule). In addition, Bradford Council is preparing a single Bradford District Local Plan. The Submission Draft is due to be published later this year.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented.

¹ The existing body of environmental regulation is retained in UK law.

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the Harden Village Neighbourhood Plan 2021-2030 (Draft for Submission);
 - a map which identifies the area to which the proposed Neighbourhood Development Plan relates (figure on Page 7 of the Plan);
 - the Statement of Community Consultation, September 2021;
 - the Basic Conditions Statement, August 2021;
 - the Harden Village Design Code, undated;
 - the Non Designated Heritage Assets Assessments, 2020;
 - the Strategic Environmental Assessment (SEA) Screening Report & Habitats Regulations Assessment (HRA) Screening Report Determination Statement, August 2021, prepared on behalf of Harden Village Council;³
 - all the representations that have been made in accordance with the Regulation 16 consultation;
 - the request for additional clarification sought in my letter dated 16 January 2023 and the responses dated 30 January 2023 and 2 February 2023 from Bradford Council and Harden Village Council respectively.⁴

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 2 February 2023 to familiarise myself with it and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I consider hearing sessions to be unnecessary as the consultation responses clearly articulate the objections to the Plan and present arguments for and against the Plan's suitability to proceed to a referendum.

³ View at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/neighbourhood-areas/?Folder=Harden\HardenReg16>

⁴ View at; <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/neighbourhood-areas/?Folder=Harden\HardenReg17>

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Harden Village Neighbourhood Plan has been prepared and submitted for examination by Harden Village Council which is a qualifying body for an area designated by the City of Bradford Metropolitan District Council on 30 August 2017.
- 3.2 It is the only Neighbourhood Plan for Harden Parish and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2021 to 2030.

Neighbourhood Plan Preparation and Consultation

- 3.4 Details of plan preparation and consultation are set out in the Village Council's Statement of Consultation, September 2021. Designation as a neighbourhood area was made by Bradford Council on 30 August 2017. Initial engagement with the local community took place, in earnest, in September 2018 and included on-line and physical surveys.
- 3.5 There followed a number of engagement sessions including a drop-in event, a community feedback session and project group meetings to develop a vision, aims and objectives, and initial policies. An initial draft Plan was published in August 2019 followed by consultation on-line and through physical feedback as well as through a drop-in event. A timeline of engagement activity is set out in Section 1.3 of the Village Council's Statement of Consultation.
- 3.6 Formal consultation under Regulation 14 was carried out between 28 February 2021 and 11 April 2021. Details of the representations made, and actions taken, are set out in Section 1.7 of the Statement of Consultation. Some 35 comments are recorded from three individuals as well as from Historic England and Bradford Council.
- 3.7 The Regulation 16 stage ran from 20 June to 15 August 2022. As well as the comprehensive comments from Bradford Council, responses were

received from some nine different parties representing statutory consultees and residents.

- 3.8 I am satisfied that, at both the Regulation 14 and the Regulation 16 stages, the consultation process met the legal requirements and there has been procedural compliance. Regard has been paid to the advice on plan preparation and engagements in the PPG.

Development and Use of Land

- 3.9 The Plan sets out policies in relation to the development and use of land in accordance with Section 38A of the 2004 Act.

Excluded Development

- 3.10 The Plan does not include provisions and policies for “excluded development”.

Human Rights

- 3.11 Harden Village Council is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Integreat Plus on behalf of Harden Village Council, which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Report, I support this conclusion.
- 4.2 The Harden Village Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. There are two European designated nature sites within a 10km radius of the Neighbourhood Plan area, the South Pennine Moors Phase 2 Special Protection Area (SPA) and the South Pennine Moors Special Area of Conservation (SAC) but no significant environmental effects are anticipated. Natural England agreed with this conclusion.⁵ From my independent assessment of this matter, I have no reason to disagree.

⁵ See Section 10.2 of the Screening Report Determination Statement.

Main Issues

4.3 Having regard for the Harden Village Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are five main issues relating to the Basic Conditions for this examination.

These concern:

- Housing;
- Transport and Movement;
- Green Spaces;
- Heritage; and
- Business and Employment.

4.4 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Harden Village Neighbourhood Plan should be seen in the context of the wider planning system. This includes the Bradford Core Strategy as well as the NPPF and PPG. It is not necessary to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.⁶ Having said that, there may be scope to give emphasis to matters particularly relevant in the context of Harden.

4.5 Secondly, the Neighbourhood Plan does not have to deal with each and every topic raised through the consultation. In this regard, the content of the Neighbourhood Plan and the scope of the policies is largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.

4.6 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions.

4.7 The following section of my report sets out modifications that are necessary in order to meet the Basic Conditions. Some of the proposed modifications are factual corrections.⁷ Others are necessary in order to have closer regard to national policies and advice. In particular, plans should be succinct and contain policies that are clearly written and unambiguous.⁸ In addition, the policies should be supported by appropriate evidence.⁹

⁶ See NPPF, Paragraph 16 f).

⁷ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

⁸ NPPF, Paragraphs 15 and 16 d).

⁹ PPG Reference ID: 41-041-20140306

Issue 1 – Housing

- 4.8 Policy HNNDP:1 relates to sustainable design and renewable energy. There is reference to “new development”, “proposals” and “developments”; but the focus of the policy is intended to be housing schemes.¹⁰ The wording of the policy needs to be changed to make this clear.
- 4.9 On a further point of clarity, the first paragraph of the policy refers to “on-site energy generation from renewable sources”. The Village Council has in mind PV (solar) panels, air/ground source heat pumps or small wind turbines.¹¹ A paragraph should be added to the explanatory text by way of clarification.
- 4.10 The policy continues by indicating that proposals (for energy generation) should be accompanied by a visual impact assessment to demonstrate an absence of visual harm or visual amenity. There is no evidence to suggest that a visual impact assessment would be necessary in all cases. To ensure a proportionate approach, amendment of the text is necessary.
- 4.11 In the final paragraph of the policy, sustainable drainage systems are called for “to help... alleviate surface water”. However, the purpose is to reduce the likelihood of flooding caused by surface water run-off.¹² Correction of the text is needed.
- 4.12 On a final note regarding sustainable design and renewable energy, the policy makes reference to best practice and examples as provided in the Harden Design Code. However, applicants would also need to have regard to Bradford Council’s Homes and Neighbourhoods Design Guide Supplementary Planning Document as well as the National Design Guide and the National Model Design Code.¹³ These documents should be added to the text of the policy.
- 4.13 Necessary amendments to Policy HNNDP1 are set out in proposed modification **PM1**. These will provide clarity and accordance with the evidence and ensure the Basic Conditions will be met.
- 4.14 Policy HNNDP2 sets out the housing mix that will be required in new housing developments of 10 or more dwellings. However, the policy relates to market housing. The mix will not apply to affordable housing.¹⁴ For clarity, the policy should reference new market housing development as in proposed modification **PM2**.
- 4.15 Concerning Policy HNNDP3 (High Quality Design), and in common with Policy HNNDP1, there should be amendment to refer to *residential*

¹⁰ See Village Council’s answers to my questions, 2 February 2023.

¹¹ See Village Council’s answers to my questions, 2 February 2023.

¹² See Village Council’s answers to my questions, 2 February 2023.

¹³ See comments of Bradford Council submitted at the Regulation 16 stage.

¹⁴ See Village Council’s answers to my questions, 2 February 2023.

development and extensions as well as to other sources of design guidance. Proposed modification **PM3** refers.

- 4.16 Policy HNNDP6 has the title "High-Speed Broadband". However, this is misleading since the policy is intended to apply to all types of high-quality communications infrastructure.¹⁵ Clarity would be added through a change in the policy title (proposed modification **PM4**).

Issue 2 – Transport and Movement

- 4.17 Policy HNNDP7 (Harden to Bingley Active Travel) states that enhanced walking and cycling infrastructure connecting Harden to Bingley is required and will be sought. However, it is not clear how the policy will be given effect.
- 4.18 I saw from my site visit that improved connectivity between Harden and Bingley would be desirable. As appropriate, developer contributions could be sought¹⁶ and/or a scheme progressed through the parish's share of any Community Infrastructure Levy funding. Amended wording is recommended to cover eventualities and to add clarity (proposed modification **PM5**). This specific reference to Harden to Bingley Active Travel would be in addition to provisions on the Community Infrastructure Levy set out in Policy HNNDP11.

Issue 3 – Green Spaces

- 4.19 Policy HNNDP16 (Harden Wildlife & Habitat Network) calls for biodiversity enhancements to be undertaken "in accordance with the biodiversity objectives for each site". However, there is no certainty as to where such objectives are to be found.¹⁷ In the circumstances, an alternative form of wording is needed consistent with the desire to ensure enhancement appropriate to the species, habitat and landscape classification. Proposed modification **PM6** refers.
- 4.20 Policy HNNDP17 concerns tree planting. Amongst other things, where trees are proposed to be removed due to development, the policy calls for replacement to take place at a ratio of at least 3:1. Whilst often desirable, there is no evidence to indicate that this will be practical in all cases. The policy needs to allow for the practicalities of the situation as in proposed modification **PM7**.
- 4.21 Under Policy HNNDP18, five sites are to be designated as Local Green Space where they would be "protected from future development". However, Paragraph 103 of the NPPF states that policies for managing development should be "consistent with those for Green Belts". Green Belt policy would be less restrictive in the sense of allowing for development that is "not

¹⁵ See Village Council's answers to my questions, 2 February 2023.

¹⁶ This is envisaged by the Village Council. See answers to my questions, 2 February 2023.

¹⁷ See Village Council's answers to my questions, 2 February 2023.

inappropriate” or where very special circumstances can be demonstrated. In the absence of any evidence to the contrary, the wording of the NPPF should be used.

- 4.22 Of the five sites proposed for designation as Local Green Space, two are within the Green Belt in any event (Cricket Ground off Harden Road (Site C)) and Football Pitch off Harden Road (Site D)). Advice in guidance issued by the Secretary of State says that “consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”.¹⁸ I appreciate that there is a desire to recognise the sites’ local importance. However, I consider that existing Green Belt policy gives adequate protection and that these sites should not be designated.
- 4.23 I am satisfied that the Mill pond and surrounding woodland, the Memorial Park off Harden Road and the Village Green space at Highfell Grove proposed as Local Green Space generally meet the criteria for designation as set out in the NPPF and should be capable of enduring beyond the end of the Plan period.
- 4.24 Appropriate recognition to national Green Belt policy and guidance is given through proposed modification **PM8** and the Basic Conditions would be met.

Issue 4 – Heritage

- 4.25 Policy HNPD19 is entitled “Heritage” and deals with non-heritage sets and their settings. I agree that the buildings and structures listed in nos. 1-37 should be included in the policy as non-designated heritage assets. However, whilst the scope of the policy is at the discretion of the Village Council, it is important that the policy is consistent with and reflects the NPPF and the Core Strategy on this subject. As such, amendment is necessary to recognise the expectation of preserving, protecting and enhancing such assets; also to reference the need for a balanced judgement having regard to the scale of any harm or loss and the significance of the asset (see proposed modification **PM9**).
- 4.26 Policy HNPD21 (Key Views) is designed to retain views and vistas from Harden Village and to avoid significant adverse impacts from related development. Key views are named in the policy and are depicted on the Policies Map. Two of these (view south from Harden Road and views south from Ryecroft) show views that extend beyond the boundary of the Neighbourhood Plan’s designated area.
- 4.27 As a matter of fact, policies within the Neighbourhood Plan can only address development within the designated area.¹⁹ This needs to be made clear in the wording of the policy. In addition, views beyond the

¹⁸ PPG Reference ID: 37-010-20140306.

¹⁹ Section 38A(2) of the 2004 Act.

designated area should not be shown on the Policies Map. Appropriate amendments are included in proposed modification **PM10**. In all other respects, I endorse the identification of the 5 views in the policy.

Issue 5 - Business and Employment

- 4.28 Policy HN22 concerns business and employment. Under the opening paragraph, there is support for new small-scale enterprise and businesses especially those that would “provide convenience”. Unlike the other parts of the policy (where there is reference to other material planning considerations being satisfied), the support is unqualified.
- 4.29 Two amendments are needed, first to clarify the meaning of “provide convenience” and secondly, as intended,²⁰ to caveat the proposed level of support. Such amendments are addressed in proposed modification **PM11**.

Other Policies

4.30 There remain a number of policies that have not been the subject of commentary in the above report. These are:

- Policy HN4: Homeworking
- Policy HN5: Building for a Healthy Life & Accessible Homes
- Policy HN8: Electric vehicle charging points
- Policy HN9: Parking solutions
- Policy HN10: Pedestrian and cycle connections
- Policy HN11: Community Infrastructure Levy
- Policy HN12: Community energy schemes
- Policy HN13: Community services and facilities
- Policy HN14: Enhancing the village centre
- Policy HN15: Green infrastructure
- Policy HN20: Stone walls

4.31 To a greater or lesser extent, these topics are covered in NPPF Sections 5 (Delivering a sufficient supply of homes), 6 (Building a strong, competitive economy), 8 (Promoting healthy and safe communities), 9 (Promoting sustainable transport), 14 (Meeting the challenge of climate change, flooding and coastal change), 15 (Conserving and enhancing the natural environment) and 16 (Conserving and enhancing the historic environment). I find that there has been regard for national policy and that the Basic Conditions have been met.

Other Matters

4.32 All policy areas have been considered in the foregoing discussion. With the modifications that I have recommended, the Plan would meet the Basic Conditions. Other minor changes²¹ (that do not affect the Basic

²⁰ See Village Council’s answers to my questions, 2 February 2023.

²¹ PPG Reference ID: 41-106-20190509.

Conditions), including those suggested by Bradford Council, as well as consequential amendments, corrections and up-dates, could be made prior to the referendum at the Councils' discretion.

5. Conclusions

Summary

- 5.1 The Harden Village Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Harden Village Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 It is evident that a considerable amount of time and effort has been devoted to the development and production of this Plan and I congratulate those who have been involved. The Plan should prove to be a useful tool for future planning and change in Harden over the coming years.

Andrew S Freeman

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no/ other reference	Modification
PM1	Page 17	<p>In the first paragraph of Policy HN1P1, insert "housing" between "New" and "development".</p> <p>Add a paragraph to the explanatory text following the policy giving examples of on-site energy generation from renewable resources.</p> <p>Amend the start of the second paragraph of the policy so as to read: "As appropriate to their scale, energy generation proposals in housing schemes...".</p> <p>In the third paragraph of the policy, replace "and alleviate surface water" with "reduce the likelihood of flooding caused by surface water run-off".</p> <p>In the third paragraph of the policy, after "Harden Design Code", change the text to read: "and the Homes and Neighbourhoods Design Guide Supplementary Planning Document which should be referenced in applications. Regard should also be had to the National Design Guide and the National Model Design Code."</p>
PM2	Page 17	<p>In the opening of Policy HN1P2, insert "market" between "New" and "housing developments".</p>
PM3	Page 18	<p>In the opening of Policy HN1P3, insert "residential" between "New" and "development".</p> <p>In the second paragraph of the policy, after "Harden Design Code", change the text to read: "and the Homes and Neighbourhoods Design Guide Supplementary Planning Document and demonstrate in any planning application</p>

		how their principles have been incorporated. Regard should also be had to the National Design Guide and the National Model Design Code.”
PM4	Page 19	Change the title of Policy HNDP6 to “High Quality Communications Infrastructure”.
PM5	Page 21	At the end of Policy HNDP7, replace “will be sought” with “contributions in accordance with the Community Infrastructure Levy Regulations 2010 will be sought where appropriate”.
PM6	Page 32	In the final paragraph of Policy HNDP16, replace “biodiversity objectives for” with “nature and status of”.
PM7	Page 34	Change the opening of the third paragraph of Policy HNDP17 so that it reads: “Where practical, any trees”.
PM8	Page 36	In Policy HNDP18, end the first sentence at “local green spaces”. Add a second sentence: “Development will be managed in a manner consistent with Green Belt policy”. In the policy (and elsewhere), delete the reference to Site C) Cricket ground off Harden Road and Site D) Football pitch off Harden Road.
PM9	Page 42	Replace the opening paragraph of Policy HNDP19 with the following: “New developments will be expected to preserve, protect and enhance non-designated heritage assets and their settings. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”
PM10	Page 46	In the opening sentence of Policy HNDP21, before “should be retained”, insert “, within the boundary of the Neighbourhood Plan,”.

		On the Policies Map, amend the arrows showing views 1 (south from Harden Road) and 4 (south from Ryecroft) so that they do not extend beyond the Neighbourhood Plan boundary.
PM11	Page 49	At the opening of Policy HNDP22, replace "Support" with "Subject to all other material planning considerations being satisfied, support". Replace "provide convenience" with "support the day-to-day needs of the community".