

The Waters Upton Neighbourhood Plan

Report of Examination

Report to Telford & Wrekin Council

by the Independent Examiner:

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6 January 2016

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Summary

1. From my examination of the submitted Waters Upton Neighbourhood Plan and its supporting documents, including all the representations made, I have concluded that, with the modifications I have recommended, the making of the plan will meet the Basic Conditions. In summary they are that it must:
 - Have regard to national policies and advice;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan; and
 - Not breach, and be otherwise compatible with, European Union and European Convention on Human Rights obligations.
2. I have also concluded that:
 - The plan has been prepared and submitted for examination by a qualifying body - the Waters Upton Parish Council;
 - The plan has been prepared for an area properly designated; and does not cover more than one neighbourhood plan area;
 - The plan does not relate to “excluded development”;
 - The plan specifies the period to which it has effect – to 2031; and
 - The policies would, once some are modified or removed, relate to the development and use of land for a designated neighbourhood area.
3. I recommend that, once modified, the plan should proceed to Referendum. This is on the basis that I have concluded that making the plan will meet the Basic Conditions once modified.
4. If the plan goes forward to Referendum, I recommend that the Referendum Area should be the same as the Neighbourhood Plan area.

1. Introduction

- 1.1 I am appointed by Telford & Wrekin Council (the Borough Council), with the support of the Waters Upton Parish Council, the Qualifying Body (“the Parish”), to undertake an independent examination of the Waters Upton Neighbourhood Plan, as submitted for examination.
- 1.2 I am a planning and development professional of 40 years standing and a member of NPIERS’ Panel of Independent Examiners. I am independent of any local connections and have no conflicts of interests.

The Scope of the Examination

- 1.3 It is the role of the Independent Examiner to consider whether making a neighbourhood plan meets the “Basic Conditions.” These are that the making of 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 (see Development Plan, below) for the area; and
 - not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 1.4 Regulations also require that the Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 1.5 In examining the Plan I am also required to establish whether:
 - The Neighbourhood Plan has been prepared and submitted for examination by a qualifying body;
 - The Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the TCPA as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 (PCPA).
 - The Neighbourhood Plan meets the requirements of Section 38B of the PCPA (i.e. the Plan must specify the period to which it has effect, must not include provisions about development that is 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 Section 38A of the PCPA.
- 1.6 Finally, as Independent Examiner, I must make one of the following recommendations:
 - a) that the Plan should proceed to Referendum, on the basis that it meets all legal requirements;

- b) that the Plan once modified to meet all relevant legal requirements should proceed to Referendum; or
 - c) that the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
- 1.7 If recommending that the Plan should go forward to Referendum, I am also then required to consider whether or not the Referendum Area should extend beyond the Neighbourhood Area to which the Plan relates. I make my recommendation on the Referendum Area at the end of this Report.

The Examination process

- 1.8 I commenced initial preparation for the examination of the plan in November 2015 by reading the plan documents. The default position is that neighbourhood plan examinations are conducted by written representations.

The Examination documents

- 1.9 In addition to the legal and national policy framework and guidance (principally The Town and Country Planning Acts, Localism Act, Neighbourhood Plans Regulations, the National Planning Policy Framework and the Planning Policy Guidance) together with the development plan (see section 3), the relevant documents that were furnished to me, and were identified on the Parish and Council's websites as the neighbourhood plan and its supporting documentation for examination, were:

- Waters Upton Neighbourhood Plan – Examination version
- Basic Conditions Statement;
- Consultation Statement and appendices;
- Environmental Assessment Screening Determination; and
- Background information, including Housing Needs Survey Report, extracts from the development plan and the draft Local Plan.

- 1.10 In addition, I was furnished with schedules of the representations made to the plan; and the responses of both Parish and Borough. I found their suggested and agreed modifications to the plan most helpful.

The Qualifying Body and the Designated Area

- 1.11 Waters Upton Parish Council is the designated qualifying body for the geographical area that is the neighbourhood plan area. The Council designated the Neighbourhood Area in November 2013. There is no other neighbourhood plan for this area.

The Neighbourhood Plan Area

- 1.12 The plan area lies in the rural north of the borough, sharing a boundary with North Shropshire. There are four main village settlements – Waters Upton, Crudgington, Cold Hatton and Great Bolas together with smaller hamlets, in all ranging in size from 12 to 92 homes. A range of community facilities are present including an Indian restaurant and bar (The Lion Inn), a Village Hall, a Parish Centre and Community

Shop with Post Office and a Primary School. There is also a range of small businesses, including a butchers, building services, decorators, electrician and a commercial printer. There is also a significant number of homeworkers. Public transport is generally poor, having been reduced in recent decades.

- 1.13 The population of the plan area is some 900 in 369 homes, in an area of 1,822 ha (a density of 0,5p/ha. About 16% of homes are individual farms or houses outside of settlements. Most homes are owner occupied, with twice the borough average of rental properties and half the average with social landlords.
- 1.14 Waters Upton dates back to the 11th Century and is the main centre of the parish, with a Village Hall (the centre for many activities), Shop and Post Office. The village of Waters Upton has expanded in recent years, with 66 homes added since 2000, once all permissions are implemented (with some 23 permitted homes still remaining to be built).

2. Neighbourhood Plan preparation and public consultation

- 2.1 The Neighbourhood Plan grew out of the national Vanguard Scheme for neighbourhood planning, which also saw Madeley Parish take forward its neighbourhood plan. For Waters Upton the pilot presented the opportunity to share experience with other pilots and to respond to three main local issues: an identified need for affordable housing, deliver improved employment opportunities and secure community infrastructure.
- 2.2 The Parish has a small population so undertook a consultation process that was proportionate to its size and the range of issues it faced. The process started with a public meeting in April 2012 to identify the areas to be included in the plan; this was followed by a further meeting, that summer, which added further issues. Following that five themes were identified for public consultation – and these have become the topics in the plan:
- Housing
 - Green spaces and public spaces
 - Amenities and employment
 - Local character; and
 - Getting around.
- 2.3 A further public meeting in May 2013 viewed plans for further development in the central area and to collect responses from residents, following which application was made for designation. What followed was a mail shot survey, a consultation on the plan area and in January 2014, to commence writing the plan itself. A second mailshot survey followed, including every home in the parish. In February a public meeting considered the implications of the Borough's SHLAA. Further meetings – in Village hall or parish centre – were held to aid production of the plan.
- 2.4 A major local concern was that the village of Waters Upton had been identified in the Core Strategy for development. Thus the fourfold benefits of the neighbourhood plan were seen to be (from the Foreword):

- Protect the character and history of the parish;
- Protect our green spaces;
- Take steps to provide the right type and amount of housing that local people need; and
- Ensure that any future development is sympathetic to, and improves, the look and feel of the plan area.

2.4 The Parish received 39 separate responses to the pre-submission version of the plan: 37 from residents, one from the borough council and one from Base Architects. In all some 80 distinct comments were identified and considered. The majority of the comments required no material change to the plan. These are set out clearly in the Regulation 14 Consultation Statement.

2.5 However, a significant change occurred during the consultation in that the borough council changed the number and size of the SHLAA sites included in their Shaping Places consultation document. A major set of proposals that were subject to public consultation were those put forward by Base Architects, on behalf of their clients, for the development of land east of Waters Upton. The proposals – which could potentially involve some 130 homes - were exhibited in the Village Hall on 14th May 2014 and on which local people had the opportunity to comment.

2.6 The parish considered the revised sites at meetings in May 2014 and resolved to make no alteration to the plan, requesting that the original Dairy Crest and SHLAA site 551 remain.

Environmental Assessment and EU Directives

2.7 Under Article 3(3) and 3(4) of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC SEA is required of plans and programmes which “determine the use of small areas at a local level”. The Borough Council is the “responsible authority” and must determine whether the plan is likely to have significant environmental effects. They determined that the plan would not have such effects.

European Sites and the Habitats Directive

2.8 From the context and submitted material, I have concluded that the plan would not be likely to have a significant effect on a European Site.

Examination version – public consultation

2.9 The Draft Plan was originally submitted to the Council in June 2014. However, the plan required further SEA/HRA consultation which took place between 25th September and 10th November 2014 with Heritage England, Natural England and the Environment Agency. The plan, with modifications and supporting documents, was finally re-submitted on 15th December 2014.

2.10 The Council published the Draft Plan, under Regulation 16, with all supporting documents, for a 6-week period of public consultation, from 20th January to 6th March 2015. A total of five substantive representations were received, leaving aside the Parish Council itself and one in support from the Mobile Operators Association.

2.11 Substantive representations were made by the following parties, on a range of issues:

- Base Architecture & Design Ltd made the most extensive and fundamental representations, which I deal with later.
- The Environment Agency noted there were no housing allocations and so advised that they would expect all development to be within Flood Zone 1 and would welcome a mention of SuDs design standards. They also pointed out that Source Protection Zones are prominent in the Waters Upton area and that development should be kept out of SPZ 1 (high risk) to ensure no detrimental impact on ground waters.
- Homes and Communities Agency (HCA) commented on the affordable housing aspect of the plan and suggested drafting changes to WUH2. They also provided references to a range of funding streams.
- Natural England was supportive of the plan's focus on the protection and enhancement of green spaces. They made some comments on the structure of the plan but otherwise focused on encouraging the plan to embrace a wider, multi-functional green infrastructure and made some suggestions for improving the drafting of the relevant policies.
- GL Hearn, representing Dairy Crest (who had recently closed their facility), confirmed their support for the plan's policy WUH3 (which supports housing redevelopment of the site) as well as WUA5 (small businesses). At that time an application had been submitted for 111 new homes and employment units; this has subsequently been approved, on 13th November 2015.

2.12 The Borough Council had a fundamental concern with the plan's perceived over-focus on a primary purpose of excessive restriction of development in and around Waters Upton; together with other concerns over the plan's vision, two non-land-use policies and on some drafting (around clarity and improved definitions). Consequently, a further round of consultation was undertaken on the matters that the Council considered relevant to be considered by an independent examiner.

2.13 The matters were open to consultation for a two-week period: 8th to 22nd July 2015. Only two representations to this stage were received, a substantive one from the Parish Council and one with no specific comment from the Coal Authority.

2.14 The Parish and Borough continued to discuss their differences and were able to furnish me with a schedule of suggested modifications to the plan, which I have found very helpful indeed.

Human Rights

2.15 I have no reason to believe that making the plan breaches or is incompatible with the European Convention on Human Rights.

Plan period

2.16 The neighbourhood development plan states clearly that the plan covers the period to 2031, which is co-terminus with the emerging Local Plan. The Core Strategy plans to 2016.

3. The Neighbourhood Plan in its planning and local context

National policies and advice

3.1 The neighbourhood development plan (NDP) must have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development (the first two basic Conditions). Paragraph 16 of the National Planning Policy Framework (the Framework) is concerned with neighbourhood planning: *“The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:*

- *“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; [and]*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;”*

3.2 The plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, para 042 of the Guidance explains that:

“A policy in a neighbourhood plan 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 for which it has been prepared.”

3.3 Also, there has to be evidence to support particular policies, notwithstanding it may express a strong and well-intentioned aspiration or concern of the local community; the relevant policy sections. Paragraph 040 of the Guidance includes:

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.”

3.4 The Statement of Basic Conditions sets out how the Parish considers that the plan meets the relevant Framework policies; though there is no mention of the national Planning Practice Guidance (the Guidance). It also sets out how it is in general conformity with the strategic policies of the development plan; though it also refers to the emerging Local Plan, Shaping Places, now called the Telford & Wrekin Local Plan.

The Development Plan - strategic policies

3.5 The neighbourhood development plan must be in general conformity with the strategic policies of the development plan for the area. I am advised by the Borough Council that the development plan for the plan area comprises the Core Strategy (adopted 2007) and the saved policies of the Local Plan (2000). The strategic policies

are CS1 (Housing targets; including 170 to be met from the rural areas), CS7 (Rural Area, where development will be limited to the needs of the area, focused on three settlements, including Waters Upton; to include affordable housing at 40%) and CS15 (Urban design; identity and a positive local image). The Borough consider that saved policies UD2 (Design criteria) and H10 (Scale of development) are also strategic.

- 3.6 The Basic Conditions Statement also refers to the emerging Local Plan. This is not part of the development plan and I have not taken it into account. Though, in passing, it is of note that Draft Policy HO10 (due to replace CS7) seeks to direct new housing – a net increase in the rural area of 900 by 2031 – to sites with unimplemented consents and redundant sites, including at Crudgington. Waters Upton is in a (larger) group of settlements where only a limited amount of new housing will be supported.

The Neighbourhood Plan and its objectives

- 3.7 The plan is primarily concerned to ensure that future development is sympathetic to, and improves, the character (described as the look and feel) of the plan area. In doing so it seeks to accommodate some new development while protecting the features that the local community consider to be important – the character and history of the parish and villages, together with some green spaces and open spaces. However, in its housing objectives, it seeks removal of Waters Upton from the Core Strategy policy that identifies it as suitable for some development; given CS7 is a strategic policy, it cannot do this, which I pick up in the next section.
- 3.8 The plan does not allocate any sites for housing though it overtly supports new housing on the former Dairy Crest site at Crudgington, as a brownfield site suitable for development. In doing so it effectively plans for in excess of 100 new homes. However, this location is not a settlement identified in CS7, so additional homes are to be accommodated in smaller infill sites or plots in Waters Upton itself. Around this spatial strategy, the plan seeks to protect green and public spaces (though no Local Green Spaces are designated), promote and protect the retention of local services and to advocate for certain actions – effectively not land use policies – to secure certain facilities, such as broadband, additional parking and support for small businesses.
- 3.9 The plan does not include any “excluded development.”

4. Housing

- 4.1 The plan has four objectives; they are not policies but they shape them. Taken together, they do not generally conform to the strategic policies of the development plan, nor do they plan positively. Consequently, the policies are defective in both their failure to plan positively, in their lack of regard to the Framework and in their lack of conformity to strategic policies as well as in their lack of clarity in certain respects.
- 4.2 I have given particular consideration to the representations made by Base Architecture & Design Ltd. They point out a number of ways in which the currently worded policies do not meet the Framework – which seeks, inter alia, to boost significantly the supply of housing, amongst other objectives - and are inconsistent with the strategic policies of the development plan. They refer, inter alia, to Policy CS7, noting it identifies Waters Upton as a ‘Service Centre’, pointing out that it has a

range of social infrastructure that could support new housing.

- 4.3 They point out that Waters Upton is no longer a linear development and that it is moving towards more of a cluster settlement which could be continued; that the primary school does have the capacity to extend, with the agreement of the adjoining landowner; and that additional housing will help boost the local economy and support local community facilities.
- 4.4 In particular, they object to the way that the plan effectively resists further development in the village of Waters Upton and seeks to distribute new housing around the parish rather than focusing it on the settlement identified in a strategic policy. This is valid criticism. However, I consider that the representations overplay the significance of CS7 – that development will be limited to the needs of the area. I am not persuaded that their representations make the case, in that context, for the scale of housing they are promoting.
- 4.5 The degree of development in and around the village of Waters Upton is a central consideration for the neighbourhood plan. And the process of preparing a neighbourhood plan puts significant power into the hands of the local community to determine how, and how much development they accommodate – but always in the context of the Framework and strategic policies - having regard to local conditions and identified aspirations. In this case the degree of expansion of the village promoted by Base Architecture for their clients was the subject of specific consultations and was rejected; as was that scale of new housing around Waters Upton village generally, through the wider consultation process.
- 4.6 Overall, I consider that the plan has become over-restrictive but not fatally so. I have therefore concluded that both the housing objectives and their policies need to be modified to meet the Basic Conditions.
- 4.7 I have had regard to the further discussions between the Parish and Borough and propose to adopt their suggested wording for the housing objectives. I therefore **recommend** that the objectives be modified in the following way, to meet the Basic Conditions:

Objective 1: To direct housing towards small infill sites within the built up area of Waters Upton.

Objective 2: To provide an appropriate mix of housing type, size and tenure to meet local need

Objective 3: To meet the local housing needs of the community

Objective 4: To restrict residential development to small infill sites within the built up area of Waters Upton and the previously developed Dairy Crest site at Crudgington.

- 4.8 There are four housing policies. These suffer from the way they seek to achieve the currently stated objectives, fail to meet the Basic Conditions, including by lack clarity in certain respects. To meet the Basic Conditions, I **recommend** modifications that recast the drafting, as follows:

WUH1

New housing shall be supported in the village of Waters Upton on small infill sites or plots that do not cause a visual intrusion into open countryside and, subject to the

provisions of Policy WUH2 and WUH3, elsewhere in the parish of Waters Upton the Council will only support applications for new housing in exceptional circumstances

WUH2

Affordable housing including small scale solely affordable housing schemes will be supported in the village of Waters Upton and elsewhere in the parish of Waters Upton provided that the proposal helps meet identified local need

WUH3

Proposals for new housing on the previously developed Dairy Crest Site at Crudgington shall be supported provided that appropriate conditions and planning obligations are imposed in particular to secure affordable housing to contribute towards meeting identified local need.

WUH4

Developers will be required to provide appropriate community benefit through the imposition of planning obligations having regard for the relevant law and national guidance on planning obligations.

5. Green areas and public spaces

- 5.1 The plan has three objectives, centered around protection and enhancement of green infrastructure. The first is expressed in somewhat dogmatic terms and needs to be modified; the others would benefit from greater clarity of expression. I therefore **recommend** that to meet the Basic Conditions, the objectives be modified as follows:

Objective 1: To protect, maintain and enhance visually valuable green areas within villages which offer benefits to health, wellbeing and local ecology

Objective 2: To protect, maintain and enhance existing formal and informal sports and recreational facilities which encourage outdoor activities and promote life-long fitness.

Objective 3: To protect Public Rights of Way and maintain Stiles and Way-markers which enable communities and visitors to appreciate the rural area.

- 5.2 The three policies seek to meet these objectives. Natural England and the Borough made a number of suggestions for improving clarity but otherwise this section of the plan attracted little comment. I conclude that the first requires improved clarity; while the third is not a land use policy and should be deleted as such but can be retained in the supporting text, as an expression of the local communities wishes. I therefore recommend that to meet the Basic Conditions, the policies be modified in the following way:

WUGS1: To ensure the protection and retention of green areas, play areas and recreational space which are locally important and that contribute to the quality, character and amenity of the settlement.

WUGS3: delete as a policy

6. Amenities and Employment

- 6.1 The neighbourhood plan has four objectives, around the themes of promoting, retaining and enhancing facilities, including broadband. This section attracted little

attention, generally; however, these objectives would benefit from being expressed in clearer terms. I therefore **recommend** the following modifications to meet the Basic Conditions:

Objective 1: To encourage the use of community buildings and facilities working in partnership with local organisations.

Objective 2: To upgrade broadband, use of Wi-Fi facilities and IT technology for employment purposes allowing greater and broader use of our community facilities.

Objective 3: To increase available cemetery space at locations within the Parish.

Objective 4: To support alternative use of redundant buildings and seek to provide employment opportunities

- 6.2 The five policies follow the objectives. However, the third and fourth are not land use policies, so I propose that these are removed to the supporting text. Generally the policies only need improved drafting to give the clarity necessary to meet the Basic Conditions; I duly **recommend** the following modifications:

WUA1: To sustain, retain and enhance local services and community facilities in the Parish including Churches, the Village Shop, the Parish Centre, Crudgington Primary School, and the Village Hall.

WUA2: To promote and support the development of high speed broadband technology and other communications networks, within the parish to enhance the provision and use of local community facilities and services.

WUA3: delete as a policy

WUA4: delete as a policy

WUA5: To encourage and support small businesses. To promote the use of suitable redundant buildings for appropriate employment use.

7. Local Character

- 7.1 The plan has four objectives concerned with the protection of rivers, wildlife, the Well and local landscapes of value. In my view these meet the Basic Condition, subject some an improvement in clarity of the fourth. I **recommend** the following modification to meet the Basic Conditions:

Objective 4: To protect the landscape character of the villages within the Parish and continue to define their own identities. To recognise and protect the importance of our villages which are set within a distinct rural landscape with generous curtilages. To avoid light pollution in the built up areas.

- 7.3 There are three policies that follow the objectives. They attracted little attention. Again the only modifications needed are to achieve clarity. I recommend the following modifications, to meet the Basic Conditions:

WULC1: To ensure the protection of rivers, water courses and wildlife corridors

WULC3: To keep to an absolute minimum, light pollution in the Parish, the most

appropriate designs of external lighting must be used in any new development.

8. Getting Around

- 8.1 The plan has two objectives, which seek to improve public transport as well as pedestrian and cycle way connections. These promote sustainable development and meet the basic Conditions.
- 8.2 The three policies are, however, mainly concerned with advocacy rather than land-use. As such, I propose that the first two be removed and retained as supporting text. The third needs to be much clearer. I therefore **recommend** the following modifications, to meet the basic conditions:

WUT1: delete as a policy

WUT2: delete as a policy

WUT3: All development must make provision for adequate parking and servicing and address any local off-site highway impacts.

9 Conclusions and recommendations

- 9.1 The preparation of the plan has found itself at odds with the strategic policies for the village of Waters Upton. But opting out of a strategic policy is not open to the Parish plan-makers if it is to meet the Basic Conditions. Nevertheless, I am pleased to record that continuing dialogue between Parish and Borough Councils, in the light of the representations made, have been able to make substantial progress towards an agreed set of suggested modifications that are compliant with the Basic Conditions and which I have been able to adopt.
- 9.2 The objections made by Base Architecture & Design Ltd are broadly supported. However, I have concluded that their objections to the plan can be remedied by my recommended modifications. The local community is, of course, entitled to plan for their area as they see fit, provided it is within the confines of the legal requirements and the Basic Conditions – and to disagree with representations. The Framework (para 183-4) explains that neighbourhood planning gives local communities “... *direct power to develop a shared vision for their neighbourhood ... Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community*”.
- 9.3 I congratulate the Parish Council and its volunteers for all the hard work that has clearly gone into the drafting of the plan. And my thanks to both Parish and Borough Council officers for their support in making the examination so smooth.
- 9.4 Finally, from my examination of the submitted Waters Upton Neighbourhood Plan and its supporting documents, including all the representations made, I have concluded that making of the plan will meet the Basic Conditions. In summary they are that it must:
- Have regard to national policies and advice;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan;

and

- Not breach, and be otherwise compatible with, European Union and European Convention on Human Rights obligations.

9.5 I have also concluded that:

- The plan has been prepared and submitted for examination by a qualifying body - the Waters Upton Parish Council;
- The plan has been prepared for an area properly designated; and does not cover more than one neighbourhood plan area;
- The plan does not relate to “excluded development”;
- The plan specifies the period to which it has effect – to 2031; and
- The policies relate to the development and use of land for a designated neighbourhood area, subject to the recommended modifications.

9.6. I recommend that the plan should proceed to a Referendum.

9.7 I have considered whether the referendum area should be extended to cover any adjoining areas. There have been no representations on the point and I have come to the conclusion that the area should be the same as the plan. Accordingly, I recommend that the plan, in proceeding to referendum, should have a Referendum Area that is the same as the Neighbourhood Plan area.

John Parmiter FRICS FRSA MRTPI

Independent Examiner

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6 January 2016

Annex

It is not my role to improve what is a succinct document. However, as the plan moves to the next stage, the Parish and Borough Councils might consider the following:

1. Use of numbered sub-headings and paragraph numbering throughout.
2. Using a notation for all photos and correcting the missing Figure numbering on pages 14 and 15.
3. Consolidating the main topics, their objectives and polices into distinct sections – at present they are rather disconnected.
4. Amend some supporting text that no longer fits the stage the plan will have reached or the modifications.