

Welbourn Neighbourhood Development Plan
2015 - 2030

Pre-Submission Consultation Statement

**Comments from North Kesteven District Council
Appendix 'E'**

Welbourn Neighbourhood Development Plan

Comments on Pre—Submission Consultation Draft (Regulation 14 Stage)

Introduction

North Kesteven District Council (NKDC) was consulted on the pre-submission draft of the Welbourn Neighbourhood Development Plan (WNDP) during the formal six-week consultation that ran from 16th January to 27th February.

This is the first time that NKDC has been invited to comment on the full proposed plan, after being asked to provide a Strategic Environmental Assessment (SEA) screening opinion and planning advice on a section of the draft plan in December 2014.

Firstly, NKDC would like to congratulate the WNDP steering group on the work they have undertaken to date. A lot of time and effort has clearly gone into the production of the plan and into the evidence and consultation that has underpinned its production.

Purpose of this Report

The comments in this report are intended to assist the group in making the final changes necessary to the plan in advance of submitting it to NKDC. This report includes changes which are necessary in order to make the plan meet the basic conditions (and thus enable it to proceed towards referendum and adoption) and it also includes recommendations which will improve the effectiveness and usability of the plan.

The table below sets out the comments on each section or policy with the comments being divided up in the following categories:

- Comments on Basic Conditions – This column includes details in relation to the basic conditions, including recommended changes that are considered necessary to ensure the plan meets the basic conditions.
- Comments on Evidence – This column includes comments on the evidence presented or, where there is no evidence provided in the Plan, suggestions for information that would be useful to include, either in the plan or accompanying it.
- General Comments – These comments are intended to improve the usability of the plan and how it will be applied once adopted.

Please note that the comments below do not identify spelling and grammar issues, of which some were identified during the review. After revising the neighbourhood plan in light of comments received during the regulation 14 pre-submission consultation, the qualifying body should do a thorough read through of the document before submitting the plan to NKDC to ensure that all spelling and grammatical errors are addressed.

Conclusion

Overall, it is considered that the Welbourn Neighbourhood Development Plan, subject to the below comments and recommendations, meets the basic conditions as required by regulations. There are

considered to be changes necessary to make the plan deliverable, and to achieve the ambitions of the plan, but these are considered to be capable of being made without having to undertake this stage of consultation again.

Section 1 – Review of the draft Plan

This section provides a detailed review of the document being consulted on at the pre-submission stage. Where relevant it includes comments about the basic conditions.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
General comments			<ul style="list-style-type: none"> • Neighbourhood plan policies should relate to the use and / or the development of land. It is noted that your plan is separated out into sections with planning policies and community policies. However, the difference between these policies is not explained until page 16. For the avoidance of any doubt, it is recommended that only planning policies are retained in the Neighbourhood Development Plan (the inclusion of non-planning ‘policies’ in a neighbourhood plan can cause confusion about their intended use, raise false expectations about what can be achieved / delivered through a neighbourhood plan, and furthermore they cannot be updated easily to respond to changing priorities). However, if the community policies are to be retained, more effort should be made to differentiate them. They should not be called policies, but instead should be called projects, aspirations or something similar. Some of the subjects within the community policies section are presented as though they are to be a material consideration in making decisions on planning applications. This should also be addressed – see detailed comments 	Noted and amended to read Parish Projects.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p>on community policies section.</p> <ul style="list-style-type: none"> • You should either use the term Neighbourhood Development Plan or Neighbourhood Plan, not both. • Use of capital letters should be reviewed as they are often used when not referring to a named object or individual. • The plan should be carefully reviewed before submission to pick up spelling and grammar issues, including the tense used throughout. • The use of page numbering and section numbering is welcomed as this will assist users of the Plan. However, numbering of all paragraphs within the Plan would be useful, to make the document as user friendly as possible (e.g. to enable users to refer to specific parts of the plan when discussing proposals in person, over the phone or via email). This may mean splitting Section 2 into sub-sections to make numbering more easy / logical. 	Agree to all comments.
Front page			<ul style="list-style-type: none"> • For the avoidance of doubt, you should put the months in the plan period, e.g. January 2015 to December 2030. 	Agree
Contents Page			<ul style="list-style-type: none"> • The contents page should be checked against the sections of the plan to ensure that the section and policy titles exactly match the section and policy titles used throughout the plan. For 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p>example, the Community Well Being section has a longer title in the body of the Plan and the entire title should be included.</p> <ul style="list-style-type: none"> Some of the section page numbers appear in blue, bold text in the contents page, whilst others do not and some do not have page numbers. This should be rectified to be consistent. 	
Section 1			<ul style="list-style-type: none"> Section 1 includes a lot of repetition. You should review the section and consider the best place for information to be included. Figure 1 is illegible: all maps and diagrams in the plan must be clear. 	Agree to amend.
Section 1.1			<ul style="list-style-type: none"> Much of the information provided, whilst interesting, does not relate to the plan. You should try to keep information relevant and concise. Perhaps consider using bullet points to present key facts/ points. Fourth para – some of the wording here is emotive and inappropriate to include in a planning document. This should be reworded to be more balanced. Fourth para - While most people will know what the abbreviation ‘WW2’ means, such abbreviations should be avoided where possible, and the words written out in full. Sixth para- what is meant by the wording “<i>the higher costs associated</i>” 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<i>with living in a rural environment, particularly energy...”? As currently worded, it implies that rural housing incurs higher heating and electricity costs- if this is what was intend, what evidence do you have to support this statement?</i>	
Section 1.2			<ul style="list-style-type: none"> • This section repeats information from other sections. This should be reviewed and information only retained in the best location, wherever possible. 	Agree to amend.
Section 1.3			<ul style="list-style-type: none"> • Reconsider the use of the term ‘place plan’ as this not a recognised term. • Review the wording of the second paragraph – what do the second and third sentences mean? 	Agree to amend.
Section 1.4			<ul style="list-style-type: none"> • Repetition in this section from other sections. This should be reviewed and information only retained in the best location, wherever possible. 	Agree to amend.
Section 1.5			<ul style="list-style-type: none"> • Repetition in this section. • Second to last sentence of first para (“Any Neighbourhood Plan is subject to...”) - the wording is incorrect and should be amended as so: Change “where, to be approved by the community, it must receive at least 50%...” to “where, to be adopted by the Local Planning Authority, it must receive 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p><i>more than 50% vote in favour of the plan”.</i> (if the plan gets a straight 50% vote in favour it will not be adopted- a majority vote is needed).</p> <ul style="list-style-type: none"> • Last sentence of first para is factually inaccurate and should be reviewed – the Neighbourhood Plan will not become part of the local plan but will become part of the development plan. • The term local development framework is not generally used anymore. The reference in the second paragraph should be replaced with Local Plan. The word ‘strategic’ should be removed as it will not only be the strategic policies of the Local Plan that are used, it will be all Local Plan policies. 	
Section 1.7 – The Vision			<ul style="list-style-type: none"> • This should be reviewed and amended to be about what Welbourn will be. References to surveys and consultations should be removed. The last two sentences of the first para should also be reviewed – they are about the plan, not the place. Some of this information is fine to include as introductory text to the vision, but should not form part of the vision itself. If you do include introductory text, you should make the vision itself distinctive by using a text box for example. • Fourth bullet – ‘endorsing policies’ – what policies does this refer to and 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p>how will the plan endorse them. Should this be 'proposals'?</p>	
<p>Section 1.8 - Objectives</p>			<ul style="list-style-type: none"> • Having the objectives split in different locations is not a user-friendly approach. They should all ideally be alongside the vision. The objectives should directly relate to the vision as a means of achieving the vision. They should link clearly with both the vision and the policies. • It is unclear what the role of these objectives is. The introductory sentence states that, 'The general objectives are grouped under the following key themes within the plan.' However, in the other areas of the plan where there are objectives, these themes do not seem to be mentioned by name here. If the objectives stated in 1.8 are the overarching objectives of the plan, supported by more detailed objectives elsewhere, this should be specifically referenced, i.e. <i>'The overarching objectives of the WNDP are...Other sections of the plan have more detailed objectives relating to specific themes, but all relate to these overarching objectives.'</i> This is important to clarify for the readers of the plan. If there are overarching and sub objectives, a table in Section 1 setting these out would be a useful single point of reference. • In the third bullet point, what are the 'limits of buildings' being referred to? 	<p>Agree to amend.</p>

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			<p>This is an ambiguous term that should be revised to clarify. If it refers to the developed footprint of the village, this has been defined in the Preliminary Draft Central Lincolnshire Local Plan as the continuous built form of the settlement and excludes: i) individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement; ii) gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where the land relates more to the surrounding countryside than to the built up area of the settlement; iii) agricultural buildings and associated land on the edge of the settlement; and iv) outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement (see policy LP39 in Preliminary Draft Local Plan).</p> <ul style="list-style-type: none"> • In the fifth bullet point, what is the 'income gain' being referred to? This is an ambiguous term that should be revised to clarify. 	
Section 1.9 Sustainability Appraisal			<ul style="list-style-type: none"> • This section is mainly unnecessary and it is unclear what you are trying to achieve with it. If you are trying to make a statement about how your plan is helping to deliver sustainable development, as required by the basics conditions, this could be much more 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p>concise. There is no need to mention SA or SEA if this is the case. The wording should be clear about what the purpose of the section is.</p> <ul style="list-style-type: none"> • The statement in the first sentence is factually inaccurate. Whilst Sustainability Appraisals are not required for Neighbourhood Plans, a Strategic Environmental Assessment may be required (if the plan is likely to have significant environmental impacts), regardless of whether the neighbourhood plan is in conformity with the Development Plan. • The WNDP will need to be in general conformity with the existing Local Plan (i.e. the NK Local Plan 2007), unless its adoption comes after the Central Lincs Local Plan is adopted, in which case it will need to be in conformity with this plan. The statement about the WNDP ‘refining’ the Central Lincs Local Plan is misleading. Whilst the content of the WNDP is generally in line with the aspirations of the emerging Central Lincs Local Plan – defining Welbourn as a ‘small village’ in the Preliminary Draft version – its ability to ‘refine’ the Central Lincs Plan is limited due to the strategic nature of the Central Lincs Local Plan. This should be amended to reflect the situation accurately. • It is unclear what the last sentence and four bullet points are about and what it means for the plan. Are these 	

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			the criteria that your plan is attempting to deliver as key considerations for your area? An examiner may not judge your plan against only these criteria, so you should be careful about how things are worded. This section should be reviewed and clarified, if retained.	
Housing and the Built Environment Objectives			<ul style="list-style-type: none"> Objective 4 - The wording of this objective is negative, unclear and overly long, and should be reviewed. It is not appropriate to refer to 'speculative profit motives' in a plan and this statement should be removed. It also makes little sense in its current format, and as such should be revised. Suggested wording for a revision is 'Requirements for housing numbers and types will be based on official projections and evidence of local need.' 	Agree to amend.
Section 2.4 Strategic Housing Market Assessment			<ul style="list-style-type: none"> This title should be revised to 'Housing Assessment' as it does not review the housing market, is not strategic in nature and could be confused with the Strategic Housing Market Assessment being undertaken to support the Central Lincolnshire Local Plan. 	Agree to amend.
Policy H1 – Managing Housing Growth	This policy supports a number of elements of the NPPF and the North Kesteven Local Plan (NKLP), is worded positively and is considered to set out some reasonable	The evidence and justification section for the policy sets out the rationale from evidence sources for the approach in the policy and appears to be broadly appropriate	<ul style="list-style-type: none"> There is no guidance in the policy about how any proposals should be considered after 39 dwellings have been delivered. If the intention is that they will be considered on their merits, 	Will seek to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
	<p>considerations that will result in proposals for sustainable development. Whilst it suggests an amount of growth that will be supported, it does not include a ceiling for the amount of development that may occur. This is considered to be important to demonstrate adequate regard to national policy.</p>	<p>in its assumptions on growth. Importantly, the policy does provide some flexibility for additional dwellings should the need arise.</p>	<p>the policy should make this clear for decision makers.</p> <ul style="list-style-type: none"> • Part a) refers to the village curtilage: this should be defined within the policy (ideally by making reference to the map at fig. 4 which clearly depicts the area which is considered to be within the village curtilage). Without this definition, the term 'village curtilage' could be subject to interpretation. • In part c) of the policy the third 'and' should be replaced with 'are'. • Part f) is not needed in addition to policy EN3. • Some of these aspects are design considerations that might sit better in a design policy rather than a policy about growth. You may want to consider amending the policy title or relocating some of these aspects. 	
<p>Section 2.7 Evidenced Housing Need</p>		<p>There are concerns about the numbers in the housing need evidence. Whilst you state that there was population growth in North Kesteven of only 0.7% in 2012, this is not an acceptable basis for identifying objectively assessed need. The low figure for 2012 is as a direct result of the economic downturn and cannot be assumed to continue through the plan period.</p> <p>It is also difficult to extrapolate the</p>	<ul style="list-style-type: none"> • The second sentence refers to homes being built for 'personal profit'. Whilst homes may be built for personal profit, it is unclear why this statement is being made and it appears quite anti-developer. This should be reviewed and amended to provide non-emotive, more balanced wording that sticks to facts rather than generalisations. • Some of the headings seem to have lost their formatting in this section. • The heading titled 'National Planning Policy Framework: 158/159. Using a proportionate evidence base' is a 	<p>Agree to review and amend.</p>

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
		<p>district's housing trends and projections for a parish area, due to local circumstances and variables across the district. Policy decisions in the Central Lincs Local Plan will also impact on the level of growth at local levels.</p> <p>If housing numbers are to be incorporated they should be based on past delivery, projected forward. If district numbers are to be used as a basis for your numbers, it should be based on recent ONS projections, not discounted by looking at a single snapshot from one year in a downturn.</p> <p>If housing numbers are retained, the plan should include a clear explanation for the growth figure used (e.g. why was the growth rate of 0.7% per annum deemed appropriate? The fact that this was the actual growth rate for 2012 is not sufficient in itself). Whilst the evidence is explained it could be made clearer and more concise.</p> <p>You may want to reconsider the necessity of including housing numbers in your plan.</p>	<p>strange heading to include here as it does not relate to the content – suggest this is reviewed and amended.</p> <ul style="list-style-type: none"> • The last sentence of the paragraph under the 'ONS Forecast' heading does not make sense "...it is estimated the following result by 2031". Furthermore, a 2031 result is not presented here? • The numbers quoted in Table 2 do not match the numbers quoted in a previous section (2.2) for population and occupancy. • Step Two: the second paragraph states that the 2012 growth rate of 0.7% indicates that the growth rate may be declining, but no evidence of growth rates prior to 2012 is provided to support this statement. • Under Step Two, in the fourth paragraph it states that Welbourn's infrastructure is 'already at maximum capacity' but no evidence of this is provided. 	

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Section 2.9 Potential Sites for Future Development	<p>At present, the plan does not allocate these sites shown in figure 5.</p> <p>If the sites identified in 2.9 are to be allocated in a policy / policies in a later iteration of the neighbourhood plan, there should be clear evidence of:</p> <ul style="list-style-type: none"> - how the sites have been identified; and - how they have been appraised to ensure that the sites allocated are in sustainable locations and can deliver sustainable development. <p>The plan would also need to be screened again for environmental effects if the allocation of these sites is included in a later version.</p>		<ul style="list-style-type: none"> • It would be beneficial if this section included more supporting information about why the desires of the parishioners are important, e.g. why is it important to avoid development on the eastern side of the village? The wording does not flow in some areas and should be reviewed. • It is unclear what the purpose of this section is as it does not seek to allocate sites. If it is to support the policy on growth, then it should be relocated to that section. 	Agree to amend wording.
Policy H2 – Local Green Space	This policy is considered to meet the basic conditions in that it clarifies why the local green space meets the requirements of the NPPF. It is considered to be in general conformity with the NKLP and will enhance the village in retaining its distinctiveness and in providing open accessible green space. See also general comments about Local Green Spaces in the general comments column.	The evidence and description for this policy is considered to be appropriate.	<ul style="list-style-type: none"> • This policy does not relate well to the housing section it is in and would sit better in the Environment section or possibly Community Well Being section. • One of the criteria in paragraph 77 of the NPPF, relating to local green space, is that designation should not include an extensive tract of land. It should be noted that in some other neighbourhood plans, extensive areas proposed to be allocated as Local Green Space have been rejected at examination. This should be borne in mind when drafting the final version of 	Comments noted and will review. Requests for additional LGS have come from community.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			the plan to consider whether the area proposed is appropriate (in accordance with the criteria of paragraph 77 of the NPPF) and the supporting information is robust enough to satisfy an examiner.	
Policy H3 – Parking Provision	Whilst this policy provides different parking standards to those in the NKLP, it is not considered to undermine the strategic function of this policy. It is considered to have regard to national policy and contribute to the delivery of sustainable development.	There is no demonstration of how the minimum numbers were arrived at or of how this would tackle the identified problems. For example, would a development at the edge of the village be likely to have the same impact of a development near to the identified problem roads? The justification should go further to demonstrate why the standards are appropriate and how they have been arrived at.	<ul style="list-style-type: none"> • The Eric Pickles quote is unnecessary to support the policy as it holds no weight and does not relate to the local situation. • The proposal to incorporate well-designed car parking is supported. However, the proposed parking standards could result in fewer spaces being provided in developments of one and two bedroom homes than in the current standards of the NKLP, leading to unwanted consequences. • The policy makes no provision for visitor parking which could contribute significantly to on street parking issues in some instances. The policy should seek to address this if specifying standards. • As it is currently worded, the table cannot be used in decision making (only policies carry weight in decision making, not supporting text). If the parking figures are proposed to be used in decision making, the policy should either include the table or should refer to it directly. 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
Section 2.14 Plans for new homes			<ul style="list-style-type: none"> The text states “communal parking areas may be considered as an alternative” – it is slightly ambiguous what this is an alternative to. This should be clarified. 	Agree to amend.
Policy H4 – Conversion of Existing Buildings and Brownfield Land	This policy is considered to meet the basic conditions.	This policy is not accompanied by evidence in the plan. However, it covers overarching principles that are largely supported by the NKLP and national policy to encourage the development of brownfield land. Some additional justification to back up the reasoning for the policy would be beneficial.	<ul style="list-style-type: none"> There are two cross-references to other policies in this policy. Point 1 cross-references policy H1 directly and point 4 repeats the requirements of policy H3 – these are not necessary and should be removed as these policy requirements are already covered in the plan. It would be useful to include what aspects of character should not be harmed under point 2. Inclusion of considerations such as height, important features, materials, etc. are useful to guide the decision maker about how this policy should be applied in planning applications. 	Agree to amend.
Policy H5 – Affordable Homes		There is no evidence provided to support this policy. Paragraph 2.17 states that ‘It is justified in terms of evidence gathered as to local needs.’ This does not constitute evidence.	<ul style="list-style-type: none"> Whilst there is sympathy with the intent of this policy, it is questionable whether this is deliverable through the planning system. This policy relates to the occupation of affordable housing which is not a planning matter. The National Planning Practice Guidance clearly states that ‘A neighbourhood plan must address the development and use of land.’ [Paragraph: 004, Reference ID: 41-004-20140306]. Affordable housing need and priority is 	Policy to be deleted as recommended.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			generally set out in a housing register policy rather than a planning policy document. North Kesteven’s policy is available in the Lincs Homefinder Policy and Guide on the NK website. It is recommended that this policy be deleted and the goals be pursued through other means.	
Section 2.17 Provision of affordable homes			<ul style="list-style-type: none"> The text states that “<i>this policy provides affordable housing in accordance with the NPPF.</i>”. This is incorrect, as the policy does not relate to the delivery of affordable housing, rather it seeks to control occupation, and secondly, the NPPF does not include any guidance on the allocation of affordable housing. 	As above.
Policy H6 – Design Features	This policy is not overly prescriptive and promotes good design, in line with the requirements of the NPPF. It is considered to meet the basic conditions.		<ul style="list-style-type: none"> The specific features in figures 7 and 8 as referred to in this policy only relate to specific parts of Welbourn, yet the policy refers to the entire area. The policy should only be included in its current form if the inclusion of these features are appropriate in all circumstances. For example, would a development which included a single pitched roof dormer be out of character everywhere in Welbourn? The implications of this policy should be reviewed for potential impacts and amended if it is not considered to be appropriate to all locations in the neighbourhood area. The policy would 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			<p>be improved by including a list of criteria that should be incorporated or considered in designs to ensure that it is locally distinctive. Paragraph 59 of the NPPF provides a list of aspects that design policies can concentrate on to assist both applicant and decision maker.</p> <ul style="list-style-type: none"> • As currently worded, the policy applies to all buildings (i.e. “new builds”): as this policy is within the housing section, and given Figs 7 and 8, it is assumed that the policy is only intended to apply to housing development- if so, the policy wording should be amended to clarify this. 	
Policy H7 – Local Fibre or Internet Connectivity	This policy is considered to meet the basic conditions.		<ul style="list-style-type: none"> • This policy is within the housing section, yet it would seem appropriate to apply it to non-residential developments too. Whilst it would not be appropriate to apply to all development (e.g. a new shower block on a campsite), it could reasonably be applied to development of new houses and business properties. If so this policy should be moved to a more appropriate section (possibly a whole new section as it does not seem to fit under the existing section categories). 	Agree to amend.
Policy CWB1 – Health and Well-being of Welbourn	This policy is considered to meet the basic conditions.		<ul style="list-style-type: none"> • The wording of this policy could have unintended consequences. In its current form it could suggest support for the development of a large hospital 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
Community			or care home. It is recommended that the policy be amended with the following wording added to the end '...where they are of an appropriate scale for the rural setting.'	
Policy CWB2 – Existing Community Facilities	This policy is considered to meet the basic conditions.		<ul style="list-style-type: none"> Criteria b) requires evidence that there is no longer demand for the existing use, which is considered reasonable. However, the latter part of this criteria requires evidence that there is no demand for “any alternative community use”: this could be unreasonable and impractical to enforce. The addition of ‘reasonable’ alternative community uses would make this more suitable for use, but the policy should be specific about how this should be demonstrated, i.e. through marketing evidence for a 6 month period, for example. The justification and evidence includes a repetition of text at the end of the first paragraph and in the second paragraph. 	Agree to amend.
Policy EMP1 – New Employment Generating Use	This policy is considered to meet the basic conditions.		<ul style="list-style-type: none"> The wording of the policy is quite clunky. The introductory wording should be amended to read ‘New employment development will be supported provided that it is: ...’ with the bullet points being amended as necessary to read correctly. 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
Policy EMP2 – Signage on the A607	This policy is considered to meet the basic conditions.	Have Lincolnshire County Council, as Highways Authority, reviewed this wording and stated that they are content with it? It should be brought to their attention specifically to highlight whether they have any concern.	<ul style="list-style-type: none"> • The use of the term ‘bring forward’ is ambiguous and could relate to physically bringing signs forward from their current position. It should be amended to read ‘New proposals for signage on the A607, drawing attention to Welbourn Village businesses and services will be supported.’ However, the lack of specific criteria within this policy could have unwanted implications, with large signs, ill designed, or illuminated signs being erected. The policy could be amended to specify the type of signage that will be supported, in order to avoid unintended consequences. • There is duplication of wording in the justification and evidence section between the first and second paragraphs. 	Agree to amend.
Section 2.32			<ul style="list-style-type: none"> • What is the purpose of this table? The text does not refer to it. If it is not supporting the policy this should be removed to avoid confusion. 	Agree to delete.
Section 2.34			<ul style="list-style-type: none"> • Some of the wording relates to context of the plan area and as such is covered in early sections. This repetition should be reviewed and unnecessary information removed from this location. 	Agree to amend.
Policy EN1 – Retain Features	This policy is considered to meet the basic conditions.	It would be beneficial to include some brief wording here about why		Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
		these features are important to the village to help justify the policy.		
Policy EN2 – Impact of Alternative Sources of Energy and Communication Masts	This policy is considered to meet the basic conditions.		<ul style="list-style-type: none"> • The wording of the policy should be amended with ‘such sites’ being replaced with ‘proposals’. • It would be beneficial to include information about where the important views of the village are and from what distance views of the village should be retained. This will assist by providing clarity about where needs to be protected. • The policy could also be strengthened by clarifying what ‘impacts’ should be considered when assessing a proposal to determine whether the impacts will be unacceptable (e.g. visual impacts, noise, impact upon residential amenity, etc). 	Agree to amend.
Policy EN3 – Agricultural Land	Whilst this policy is considered to meet the basic conditions it is not clearly worded and could introduce some ambiguity and as such should be reworded.	Some of the wording used in the community consultation section is emotive. This section should be reviewed to make it more balanced and matter-of-fact.	<ul style="list-style-type: none"> • The policy is somewhat ambiguous in its current form and could be improved by a simple rewording, which will provide greater certainty over what development should be resisted. The policy could be reworded as follows, ‘The food-producing role of agricultural land will be retained. Proposals that would result in the loss of the best and most versatile agricultural land will be refused.’ (The term ‘best and most versatile agricultural land’ should be added to the glossary, and defined as per the NPPF). This would make the policy clearer for decision takers. You 	Agree to amend.

Policy / Section	Comments on Basic Conditions	Comments on Evidence	General Comments	SG Comments
			could also include something about diversification of farm buildings to help ensure their continued productivity.	

Community Policies Section

Policy / section		SG Comments
Section 3 – Community Policies	<ul style="list-style-type: none"> • Ideally this section should be removed from the plan and kept separately. This section reads more as an ‘action plan’ and largely does not seek to address planning policy matters. A neighbourhood plan is not the most appropriate vehicle for these goals as the ‘policies’ have no weight in planning terms. Furthermore, the large number of ‘community policies’ makes the plan unnecessarily lengthy, and reduces its user-friendliness. <p>If this section is retained, there needs to be greater differentiation between the ‘Community Policies’ section and other sections. Whilst the section heading states ‘these do not require planning approval’ the way some of the policies are worded make the relationship ambiguous. If the ‘policies’ are retained, they would be better placed in an appendix rather than a section of the main body of the plan. If this section is retained in the plan, the separation should be achieved by a) not naming these as ‘policies’, but something like projects, as used elsewhere, or aspirations; b) having a clear definition in the subjects being covered in the plan and outside of it – i.e. subjects covered in this part not being closely linked to planning; and c) not wording them in a way that makes them sound like a requirement to be considered in proposals. Other necessary changes include providing clear explanations in the document at the appropriate locations, including in the first few pages and at the start of this section.</p>	Agree to amend.
Community Policy H1	<ul style="list-style-type: none"> • It is not clear what the purpose of this ‘policy’ is. It cannot require applicants to submit a housing need assessment as it is not a planning policy. This could easily be misconstrued as a policy to be taken account of in planning decision making, which is inappropriate given its status. As it is worded, it could require all developments, including householder extensions, developers of a single dwelling and employment uses to submit an assessment. This is not relevant to some developments and would not be proportionate to the impact that other developments would have. If this requirement is retained in any form it should clarify that this relates only to residential development of a suitable scale, e.g. 3 or more dwellings. • This ‘policy’ has the same number as planning policy H1. This will cause confusion for users. • See also comments on community policies H1-H2 below. 	Agree to amend.
Community Policy H2	<ul style="list-style-type: none"> • It is not clear what the purpose of this ‘policy’ is. It cannot require applicants to submit a design statement or risk assessment as it is not a planning policy. This could easily be misconstrued as a policy to be taken account of in 	Agree to amend.

	<p>planning decision making, which is inappropriate given its status. This should be revisited to clarify what types and scales of development it refers to.</p> <ul style="list-style-type: none"> • See also comments on community policies H1-H2 below. 	
Community Policies H1-H2	<ul style="list-style-type: none"> • These policies seek to require information in support of applications, but as they are not planning policies cannot be afforded any weight and therefore it is likely that they will not be adhered to by applicants. It may be preferable to incorporate them into a planning policy seeking for additional local information to accompany planning applications. For example, the Ascot, Sunninghill and Sunningdale Neighbourhood Plan included a policy requiring development of a suitable scale to submit additional information in a development brief, including some local consultation. Amending these requirements and relocating them to the planning section should achieve the results being sought by the community policies but will hold weight. This would also reduce ambiguity and potential confusion. If the principles of this 'policy' are incorporated in a planning policy, the wording needs to be carefully considered to ensure that the requirements and implications of the policy are proportionate and reasonable. 	Agree to amend.
Community Policies EN1-TR5	<ul style="list-style-type: none"> • No additional comments to make on these community policies. 	Agree to amend.

Glossary

Policy / section		SG Comments
General	<ul style="list-style-type: none"> - The use of capital letters in the titles should be reviewed and made consistent. - The items in the glossary should be in alphabetical order. 	Agree to amend all comment regarding Glossary
Affordable Housing	<ul style="list-style-type: none"> - The definition is slightly incorrect, this should be revised to reflect the definition used in the NPPF. - The headings for social rented and intermediate housing (and also starter and downsizing homes and family homes) appear to be the same font as the other headings around. This is out of kilter with the other headings in the glossary which otherwise are in alphabetical order. These sub-headings should be differentiated or should be placed in their correct alphabetical position to assist the user. 	
Social Rented Housing	<ul style="list-style-type: none"> - The definition is fine, but in the body of the plan both 'social rented' and 'social-rented' is used. This should be rectified to be consistent. 	
Intermediate Housing	<ul style="list-style-type: none"> - The wording that is underlined seems out of place as it refers to social rented housing need rather than intermediate housing (see also comment about subsections). 	
Brownfield Land	<ul style="list-style-type: none"> - This definition is not entirely accurate. The environmental quality does not affect the status of a site in terms of being brownfield or greenfield. Your definition should be amended to be more closely aligned with the definition for previously developed land in the NPPF. 	
Community Infrastructure Levy (CIL)	<ul style="list-style-type: none"> - This should be amended to reflect what the NPPF defines. CIL is collected to deliver infrastructure to support the effects of development and is not technically a way to deliver what District Councils, Parish Councils and communities 'want', but what they need. 	
Curtilage	<ul style="list-style-type: none"> - The definition should make it clear that the term curtilage in your plan does not refer to the curtilage of an individual property, as this is a definition often used elsewhere. 	
Exception Sites	<ul style="list-style-type: none"> - This term is not used in the plan and therefore should not be in the glossary. 	
Heritage Assets	<ul style="list-style-type: none"> - The term heritage asset is not used in your plan and therefore should not be in the glossary. The term heritage is and so this could be defined. 	
Historic Environment	<ul style="list-style-type: none"> - The term historic environment is not used in your plan and therefore should not be in the glossary. 	
Listed Buildings	<ul style="list-style-type: none"> - It currently says '...grade I is the highest' but does not state highest in what way. This should be amended to read '...grade I having the greatest significance'. - The sentence on who actually lists buildings is not necessary to include. 	
Local Plan	<ul style="list-style-type: none"> - The tense in this definition needs to be reviewed as some of it is in future tense and some of it in present tense. 	
Neighbourhood Plans	<ul style="list-style-type: none"> - This section should be reviewed as some of the wording needs refining. It has been lifted from other documents but should be checked to see if it consistent with the rest of the wording in the glossary. 	
Starter and Downsizing Homes	<ul style="list-style-type: none"> - Repetition of earlier in glossary and last sentence is not correct in this location. 	

Sustainability Appraisal	- This description conflicts with the wording in section 1.9 of the plan. Sustainability appraisals are not required for neighbourhood plans, although they are recommended to ensure that the plan will help deliver sustainable development. This should be amended.	
Sustainable Development	- This section states at the end of the definition '(NPPF paragraph 152)' which suggests that the definition is from paragraph 152. When paragraph 152 is viewed it is not aligned exactly with the definition given in the glossary. The definition could be shortened to replicate the definition in the NPPF on page 2.	

Figs/ tables used in this document

Fig / Table		
Fig. 8	This should say page 36.	Agree to amend.
Table 5	This should say page 31.	Agree to amend.