

# Potton Neighbourhood Plan 2016 - 2035

## Produced by Potton Town Council

### Health Check December 2018: Undertaken by Derek Stebbing BA (Hons) DipEP MRTPI<sup>1</sup>

#### Summary of Recommendations

##### Process

- We recommend below that a copy of the Potton Neighbourhood Plan (the Plan ) Neighbourhood Plan Area Designation Map (dated 3 December 2015) be included within the Introduction section to provide clarity for users of the Plan as to the exact area covered. (1.1)  
**The map to be added to introduction on page 5**
- We recommend that within the sub-section of the Plan on “Final Plan, Submission and Examination”, a fuller explanation of the Regulation 14 consultation (which took place in May/June 2018) under the Neighbourhood Planning (General) Regulations 2012 (as amended), and how the outcomes of that consultation were taken into account in the preparation of the Regulation 16 version, be provided. Some further explanation of the Regulation 16 consultation process and the forthcoming Examination, including a prospective timeline, would also be beneficial. (1.3)  
**Text on page 9 amended – Analysis.....was fed into .....**
- We recommend that the material presently contained in Annex H on Implementation and Monitoring be placed in the main body of the Plan. We also consider that this section could be extended to include a “project plan” for the delivery and implementation of the Plan and its priorities, indicating for example those matters where the Town Council will wish to engage with other parties, including Central Bedfordshire Council, on securing the implementation of proposals contained in the Plan. (1.7)  
**We don't think that this is necessary.**  
**We are going to draw up an action plan for the NP following the Regulation 16 Consultation.**

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<sup>1</sup> Other inputs: Lee Armitage LLB (Hons) MRTPI and Steve Carnaby BA BPhil MA.

- We recommend that if a Strategic Environmental Assessment (SEA) Screening has not yet been sought by the Neighbourhood Plan Steering Group this should be undertaken as a matter of urgency to ensure compliance with Regulation 15(1)(e). (1.8)  
**CBC have written a Strategic Environmental Assessment Screening Report.**
- We recommend that if an Habitats Regulations Assessment (HRA) Screening has not yet been sought by the Neighbourhood Plan Steering Group this should be undertaken as a matter of urgency. (1.9)
- **CBC have written a Strategic Environmental Assessment Screening Report.**

### **Content**

- The Plan contains 32 emerging Policies. Whilst the majority of the Policies are appropriately justified and with a clear rationale, there is a need to undertake further work on the drafting of the text of the Policies in order to provide much more robust wording to support the rationale and purpose for those policies. (2.1)  
**Addressed further on.**
- We do not identify any extraneous material that should be removed from the Plan. However, we do recommend that Annex H and potentially also Annex G be included within the main body of the Plan, as they each provide important material relating to the Plan and its implementation. (2.2)  
**We do not agree.**
- The present references to the National Planning Policy Framework (NPPF) in the Plan are very brief. The Plan would benefit considerably by containing a separate section addressing National Policy and addressing more NPPF policy aspects that are relevant to the Plan area and the Policies in the Plan. (In this context, see also the Important Note below). (2.3)  
**Review our Basic Conditions Statement. The NPPF (2018) has been used for reference.**
- As with National Policy, we recommend that the Plan would benefit by containing a separate section addressing the relevant strategic policies contained in the adopted Central Bedfordshire North Local Development Framework Core Strategy and Development Management Policies Development Plan Document (DPD) (2009), and the emerging new Central Bedfordshire Local Plan, particularly in order that future users of the Plan can gain a better understanding of which Core Strategy policies might apply to potential developments within the Plan area. (2.7)  
**We will add references to the CBC Policies (draft Local Plan) in our Basic Conditions Statement.**
- The principal errors in the Plan concern the imprecise drafting of many of its Policies. As presently drafted, the Plan would not provide an effective mechanism for Development Management purposes, and our primary recommendation is that further work now be undertaken on redrafting the Plan's policies prior to its formal submission to Central Bedfordshire Council. (2.8)  
**Addressed later in this report**

- The majority of the draft Policies in the Plan are not yet sufficiently clear and unambiguous. Whilst the purpose of the Policies does reflect the community's aspirations, the drafting of the Policies themselves does not yet provide sufficient clarity to enable them to be accepted as robust development plan policies. A number of Policies are aspirational, whilst many are imprecise as to their intended scope and implementation. We make Detailed Comments below on the content and drafting of each of the Plan's Policies. The presentation of the Policies could also be improved by placing each of them in a framed, highlighted text box, with their Justification in following paragraphs. (2.9)

Addressed later in this report

- **Important Note:** This Health Check has assessed the Plan against the NPPF and Planning Practice Guidance (PPG), published in 2012. A revised NPPF was published on 24 July 2018<sup>2</sup>. The transitional arrangements for Local Plans and Neighbourhood Plans are set out in paragraph 214, which provides "The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019". A footnote clarifies that for Neighbourhood Plans, "submission" in this context means where a Qualifying Body submits a plan to the Local Planning Authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). We have, therefore, used the policies in the previous NPPF for the purposes of this Health Check, on the understanding that the Plan will be submitted before 24 January 2019. All references in this report are to the March 2012 NPPF and its PPG. In the event that the Plan is not submitted before the transitional cut-off date, it will need to be reappraised against the stated policy in the revised NPPF (July 2018) and PPG.

We have used the 2018 NPPF for reference/

**Derek Stebbing**  
**12 December 2018**

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<sup>2</sup> View at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

**Part 1 – Process**

	Criteria	Source	Response/Comments	Comment
1.1	Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?	<b>Central Bedfordshire Council website</b>	Yes, this requirement is met. The designation of the neighbourhood area (on 26 January 2016) is described in <i>the</i> Introduction of the Plan, and we recommend below that a copy of the Neighbourhood Plan Area Designation Map (dated 3 December 2015) be also included within the Introduction section to provide clarity for users of the Plan as to the exact area covered.	✓ <i>Added to page 5</i>
1.2	If the area does not have a parish council, have the necessary statutory requirements been met in terms of the designation of the neighbourhood forum?	<b>N/A</b>	The Plan has been prepared by a Neighbourhood Plan Steering Group on behalf of the Potton Town Council, which is the Qualifying Body.	✓
1.3	Has the plan been the subject of appropriate pre-submission consultation and publicity, as set out in the legislation, or is this underway?	<b>Potton Neighbourhood Plan – Annex C – Consultation Report</b>	Yes. Some initial consultation and publicity regarding the preparation of the Plan took place in Summer 2016, with community engagement activities taking place at a number of events, leading to the preparation of a Pre-vision Questionnaire in Autumn 2016.  The Consultation Report (October 2018) chronicles the consultation activity that took place between 2016 and 2018, and this is also referred to in the section of the Plan	✓

			entitled “How the Neighbourhood Plan was prepared”. Within that section of the Plan, we consider that the sub-section on Final Plan, Submission and Examination would benefit from a fuller explanation of the Regulation 14 consultation (which took place in May/June 2018), and how the outcomes of that consultation were taken into account in the preparation of the Regulation 16 version. Some further explanation of the Regulation 16 consultation process and the forthcoming Examination, including a prospective timeline, would also be beneficial.	
1.4	Has there been a programme of community engagement proportionate to the scale and complexity of the plan?	<b>Potton Neighbourhood Plan – Annex C – Consultation Report</b>	<p>Yes. The Consultation Report describes in detail the various consultation activities that have taken place across the Plan area, and the key events are summarised in the Plan at page 8. It demonstrates that the community has been engaged in a proportionate manner, having regard to the advice in the PPG on plan preparation and engagement.</p> <p>As noted above, we consider that the sub-section of the Plan on “Final Plan, Submission and Examination” would benefit from a fuller explanation of the Regulation 14 consultation (which took place in</p>	<p>✓</p> <p>Review the sub-section of the Plan on “Final Plan, Submission and Examination</p>

			May/June 2018), and how the outcomes of that consultation were taken into account in the preparation of the Regulation 16 version.	
1.5	Are arrangements in place for an independent examiner to be appointed?	<b>N/A</b>	<p>There is no information provided on this. Whilst the Qualifying Body has not yet reached formal submission of the Plan to Central Bedfordshire Council under Regulation 15, it is advised that the Town Council begin discussing what the process will be for identifying a suitable independent examiner with Central Bedfordshire Council.</p> <p>Whilst the general approach is to assess the resumes/CVs provided by prospective examiners, you may also find it very helpful in coming to a decision by reading examples of their reports on other neighbourhood plans.</p>	<b>CBC to arrange</b>

1.6	Are discussions taking place with the electoral services team on holding the referendum?	N/A	It is not yet appropriate to put in place arrangements for a Referendum before the Examination of the Plan. However, as the Plan advances during 2019, discussions should be held with Central Bedfordshire Council.	CBC
1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?	N/A	<p>Annex H provides material on Implementation and Monitoring and, as noted below, we recommend that this material be placed in the main body of the Plan.</p> <p>We also consider that this section could be extended to include a “project plan” for the delivery and implementation of the Plan and its priorities, indicating for example those matters where the Town Council will wish to engage with other parties, including Central Bedfordshire Council, on securing the implementation of proposals contained in the Plan.</p>	<p>Disagree</p> <p>A Project plan will be written after the referendum.</p>

1.8	Has a SEA screening been carried out by the LPA?	<b>Cannot be confirmed from available sources</b>	<p>We have not seen, nor been provided with, a SEA Screening Assessment by Central Bedfordshire Council. We cannot identify from either the Potton Neighbourhood Plan web-site or the Central Bedfordshire Council web-site whether such a Screening Assessment has been sought and provided, and therefore it is not possible at this time to confirm this point.</p> <p>The Basic Conditions Statement notes that <i>“the PNP incorporates a Sustainability Appraisal Scoping Report which gives a comprehensive background of the Potton parish and identifies features that are highly valued by the community and are the basis of the Vision outlined in the PNP”</i>. Again, we have not seen this Scoping Report, which is not referenced in the Plan, but we do not consider that this constitutes a SEA Screening Assessment.</p> <p>If a SEA Screening Assessment has not yet been sought by the Neighbourhood Plan Steering Group, we recommend that this is undertaken as a matter of urgency to ensure compliance with</p>	<p>Add the CBC Strategic Environmental Assessment Screening Report to our supporting documents.</p> <p>This is in the Supporting Documents section</p> <p>Actioned by CBC</p>
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			Regulation 15(1)(e).	
1.9	Has an HRA screening been carried out by the LPA?	<b>Cannot be confirmed from available sources</b>	<p>We have not seen, nor been provided with, an HRA Screening Assessment by Central Bedfordshire Council. We cannot identify from either the Potton Neighbourhood Plan web-site or the Central Bedfordshire Council web-site whether such a Screening Assessment has been sought and provided, and therefore it is not possible at this time to confirm this point.</p> <p>If an HRA Screening Assessment has not yet been sought by the Neighbourhood Plan Steering Group, we recommend that this is undertaken as a matter of urgency, particularly in view of any potential implications (direct or indirect) that may arise for the Plan from the recent judgement of the Court of Justice of the European Union in the Sweetman Case<sup>3</sup>.</p>	<p>Yes, in January 2018. This will be added to our supporting documents.</p> <p>The CBC Strategic Environmental Assessment Screening Report added to our supporting documents.</p>

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<sup>3</sup> People over Wind & Sweetman v Coillte Teoranta Case C-323/17. View at: <http://curia.europa.eu/juris/document/document.jsf?jsessionid=9ea7d2dc30ddf571da66f02d449d9f60cc9f39bf8846.e34KaxiLc3qMb40Rch0SaxyNch10?text=&docid=200970&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=628325>

## Part 2 – Content

	Criteria	Source	Response/Comments	Comment
2.1	Are policies appropriately justified with a clear rationale?	<b>Potton Neighbourhood Plan</b>	<b>No.</b> The Plan contains 32 emerging Policies. Whilst the majority of the Policies are appropriately justified and with a clear rationale, there is a need to undertake further work on the drafting of the text of the Policies in order to provide much more robust policy wording to support the rationale and purpose for those policies.	This is addressed later in this report
2.2	Is it clear which parts of the draft plan form the ‘neighbourhood plan proposal’ (i.e. the neighbourhood <i>development plan</i> ) under the Localism Act, subject to the independent examination, and which parts do not form part of the ‘plan proposal’, and would not be tested by the independent examination?	<b>Potton Neighbourhood Plan</b>	Yes. The Plan (presently totalling 60 pages in draft), together with eight annexes, is the ‘neighbourhood plan proposal’ to be subject to future independent Examination.  We do not identify any extraneous material that should be removed from the Plan. However, we do recommend that Annex H and potentially also Annex G be included within the main body of the Plan, as they each provide important material relating to the Plan and its implementation.	✓  Disagree
2.3	Are there any obvious conflicts with the NPPF?	<b>Potton Neighbourhood Plan</b>	No. The Plan contains a specific section on the promotion of sustainable development. However, it does not contain a Policy to that specific effect.	✓  We believe that sustainability runs through a large number of our policies

			<p>Furthermore, the present references to the NPPF in the Plan are very brief.</p> <p>The Plan would benefit considerably by containing a separate section addressing National Policy, and addressing more NPPF policy aspects that are relevant to the Plan area and its Policies.</p>	<p>How should Update the Basic Conditions to reference the NPPF more</p>
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?	<b>Potton Neighbourhood Plan</b>	<p>Yes. The Plan contains a separate section (at page 29) on “<i>The Strategy – Sustainable Development for the Whole Community</i>”, which provides a clear explanation of how the Plan can contribute to the achievement of sustainable development.</p>	✓
2.5	Are there any issues around compatibility with human rights or EU obligations?	<b>Potton Neighbourhood Plan</b>	<p>No, from our assessment of the documents received, there would appear to be no potential issues regarding compatibility with human rights or EU obligations. We do not presently identify any issues regarding this matter, although this will need in due course to be set out in full within the Basic Conditions Statement.</p> <p>It will also be helpful to confirm that Central Bedfordshire Council has no issues in this regard.</p>	✓
2.6	Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?	<b>Potton Neighbourhood Plan</b>	<p>Yes. There are no potential issues regarding this matter.</p>	✓

2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?	<b>Potton Neighbourhood Plan</b>	<p>It is not yet possible to fully assess whether there is consensus (or disagreement) between Central Bedfordshire Council and the Potton Neighbourhood Plan Steering Group regarding the Plan's conformity with the strategic policies in the adopted Central Bedfordshire North Local Development Framework Core Strategy and Development Management Policies DPD (2009) and the emerging new Central Bedfordshire Local Plan.</p> <p>However, from our review, there are areas of potential disagreement. Firstly, the Plan's policies are in the main imprecise, and in some cases purely aspirational.</p> <p>Secondly, the Plan contains relatively few references, which are spread across the Plan, to the strategic policies in the Central Bedfordshire North Local Development Framework Core Strategy and Development Management Policies DPD (2009) or the emerging new Central Bedfordshire Local Plan.</p> <p>As with National Policy, we recommend that the Plan would benefit by containing a separate section addressing the relevant strategic policies contained in the adopted Central Bedfordshire North</p>	<p>Will get feedback from CBC when the Plan is submitted. No negative feedback during regulation 14 consultation</p> <p>Addressed</p> <p>Added references the emerging new Central Bedfordshire Local in the Basic Conditions Statement</p>
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			Local Development Framework Core Strategy and Development Management Policies DPD (2009) and the <a href="#">emerging new Central Bedfordshire Local Plan</a> , particularly in order that future users of the Plan can gain a better understanding of which Core Strategy policies might apply to potential developments within the Plan area.	
2.8	Are there any obvious errors in the plan?	<b>Potton Neighbourhood Plan</b>	<b>Yes.</b> The principal errors in the Plan concern the imprecise drafting of many of its Policies. As presently drafted, the Plan would not provide an effective mechanism for Development Management purposes, and our primary recommendation is that further work now be undertaken on redrafting the Plan's policies prior to its formal submission to Central Bedfordshire Council.	<b>Policies amended.</b>
2.9	Are the plan's policies clear and unambiguous and do they reflect the community's aspirations?	<b>Potton Neighbourhood Plan</b>	<b>No.</b> The majority of the draft Policies in the Plan are not yet sufficiently clear and unambiguous. Whilst the purpose of the Policies does reflect the community's aspirations, the drafting of the Policies themselves does not yet provide sufficient clarity to enable them to be accepted as robust development plan policies. A number of Policies are aspirational, whilst many are imprecise as to their intended scope and implementation.	<b>Policies amended.</b>

			We make Detailed Comments below on the content and drafting of each of the Plan’s Policies. The presentation of the Policies could also be improved by placing each of them in a framed, highlighted text box, with their Justification in following paragraphs.	
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### Part 3 –Detailed Comments

1. These detailed comments address all matters, both of significance and of a more minor nature, across the Plan and are presented in Page order as numbered in the Plan that we have reviewed.
2. Page 2 – **Contents** – the page numbers do not fully align with the correct pages in the main body of the Plan, e.g. Annex H is presently on page 59.  
**Amend**
3. Page 5 – **Introduction** – we would recommend that a copy of the Neighbourhood Plan Area Designation Map (dated 3 December 2015) be included within the Introduction section to provide clarity for users of the Plan as to the exact area covered.  
**Add to page 5**
4. Page 9 – **How the Neighbourhood Plan was prepared** – the sub-section on Final Plan, Submission and Examination would benefit from a fuller explanation of the Regulation 14 consultation (which took place in May/June 2018), and how the outcomes of that consultation were taken into account in the preparation of the Regulation 15 submission version. Some further explanation of the Regulation 16 consultation process and the forthcoming Examination, including a prospective timeline, would also be beneficial.  
**Amend Final Plan, Submission and Examination section of NP**

5. Page 11 – **The Neighbourhood Plan Vision, Aims and Policies** – we are concerned that the Vision does not make an explicit reference to the need to promote and contribute to the achievement of sustainable development in the Plan area, the only existing reference being within clause b). This would provide an important link between the Vision and the Strategy – Sustainable Development for the Whole Community set out on page 29. **Add bullet point in the ‘Background’ on page 11**
  - **Promote and contribute to the achievement of sustainable development in the Plan area**
6. Page 12 – the phrase “identikit buildings” has no objective meaning in Planning and is a rather subjective comment (and is again repeated as “identikit properties” on page 16 and as “identikit series” on pages 18 and 38). If possible, the phrase should be avoided.  
**Page 12 - amend second bullet point:**
  - **Is undertaken such that growth is gradual, not excessive and *enhances the town by a diversity of styles that reflect its core nature*****Page 16 last paragraph .... A range of property types, roof heights .....and colours. Then delete**  
**Page 18 - replace ‘identikit’ with *identical***  
**Page 38 - replace ‘identikit’ with *identical***
7. Page 14 – the Plan is well illustrated with photographs throughout. The photograph at the top of page 14 provides a caption describing the view, but very few other photographs provide such captions. It would make the Plan more informative if captions are included for rather more photographs, again for the benefit of users of the Plan.  
**Amend (JL)**
8. Pages 30/31 – the correct title of this Map should be “Policies Map”. The map should also be accompanied by a more informative Notation Panel, identifying which specific Policies are being identified, e.g. Policy EV-3.  
**Change to Green Infrastructure and Development Map. (JH)**
9. Pages 33-45 – although the Policies are grouped under topic themes such as Housing and Transport, none of the individual policies have a specific title and it is therefore difficult on immediate reading of the Plan to understand which particular policies might apply to a specific form of development. By way of example, Policy HO-9 is a Design policy and would benefit from being headed “Design of New Development”. We recommend that each policy be given an appropriate heading.  
**Policies amended – see pages 16 - 22**
10. Pages 33/34 – **Community Infrastructure Policies**

**We are advised to also add ‘appropriate headings’ to each policy (AI).**

- **Policy CI-1** – this Policy is too broad, and it is unrealistic to expect “*any proposals*” (which technically means all planning applications) to make associated provision for an increase in accessible public health services. The Policy needs to be redrafted to make it clear that it relates to proposals for major new residential development, with the threshold defining “major” to be subject to agreement with Central Bedfordshire Council.  
*Change to: Any planning applications for new residential development must ensure ...*
- **Policy CI-2** – again, this Policy is too broad, and relates only to certain categories of residential development (i.e. those which have a school pupil generation ratio). The Policy needs to be redrafted to reflect the current policy of the Education authority for the collection of financial contributions (through Section 106 Agreements) for educational provision from residential developments that are granted planning permission.  
*Change to: Any planning applications for new residential development must ensure ...*  
*Add at the end: required, in line with CBC Policy.*
- **Policy CI-3** – as drafted, this Policy is unclear. It also applies to “*any proposals*” which is unrealistic, and probably should only apply to proposals which are specifically for employment or commercial development and those which are for mixed-use development. The Policy should be redrafted to provide a clearer indication as to the categories of development which are intended to “*promote the creation of small and medium sized businesses*”.  
*Change to: Any application for commercial or mixed-use development should support the development of small ....*
- **Policy CI-4** – as drafted, this Policy is not an effective Planning policy, and is simply an aspiration. It is difficult to see how a Planning policy can be constructed to “*support the existing businesses in the Market Square by encouraging use of these facilities*” (and it could be argued by some that such a policy is anti-competitive). Support for businesses in the Market Square may occur as a result of environmental and public realm improvements, but the Policy does not refer to such improvements. The Policy is presently defective, and as a minimum should be redrafted.  
*Change to: Any planning applications for new residential development should support the existing businesses in the Town Centre by encouraging use .....*  
*Amend the objective: ..... Town centre .....*  
*Add this final sentence: This is in line with the NPPF (2018) section 7*
- **Policy CI-5** – once again, this Policy is likely to only be applicable to certain categories of residential development. It should be redrafted to make it clear that it applies to proposals for new residential development, and that it will be achieved either by on-site provision (in the case of major developments) or by financial contributions through Section 106 Agreements in the case of smaller developments. This should be the subject of discussion with Central Bedfordshire Council to ensure that the policy conforms generally with the current Local Plan policy on this matter.  
*Amend to: Any applications for new residential development must include ... play areas, either by on-site provision or by financial contribution.*

- **Policy CI-6** – as drafted, this Policy is aspirational, and it provides no indication as to how the implementation of the Policy can be achieved. In practice, this is likely to only be feasible through the collection of Community Infrastructure Levy (CIL) (and Central Bedfordshire Council does not yet have an adopted CIL), through Section 106 Agreements where the community project is directly related to a proposed development (and in the majority of cases, there may be no such direct relationship) or through developments that might encompass the implementation of a project. As with Policy CI-4, this policy is presently defective and significant further thought needs to be given as to how a Planning policy can be drafted to meet this aspiration.  
*Amend to: Any application for new development should support the provision and maintenance .... of identified community projects, in line with CBC policy regarding CILL and S106 allocation.*
- ~~**Policy CI-7** – this Policy is also defective as it applies to “all future proposals”. This is unrealistic, and the Policy is likely to only be achievable in relation to major new residential developments. The policy needs to be redrafted accordingly, and to make it much clearer what “provisions for enhancing activities for young people” means in relation to development proposals – e.g. does it mean youth club facilities? – and also how it is intended to implement the policy, which is likely to be in most cases through Section 106 Agreements. Again, discussions will be necessary with Central Bedfordshire Council.~~  
*Remove this policy*
- **Policy CI-8** – this Policy (and its justification) requires some amendment to provide a direct link to the identified (and proposed) Green Infrastructure network as identified on the Policies Map.  
*Now CI-7*  
*Change to: Any planning applications for new residential development must, where appropriate, ensure that public access areas .... facilities, as identified in the Green Infrastructure Plan (Annex B).*

## 11. Pages 36-38 – Housing Policies

- **Policy HO-1** – clearly, this Policy is intended to apply to new residential developments, and the policy should be amended to make this clear, and with better and more informative cross-references to Annex E (not Appendix E as stated) and Annex F in terms of what these two supporting documents contain.  
*Typo – replace Appendix with ‘Annex’*  
*We need consistency throughout when stating Annex and title.*  
*Expand the objectives a bit. (DN)*
- **Policy HO-2** – in Planning terms this is a phasing policy, but as drafted it is not effective at all. To be effective, the Policy needs to state how new residential development will be phased over the Plan period up to 2035 in relation to the delivery of new supporting infrastructure. As such, the Policy requires redrafting.
- *Change to: Any new residential development over the plan period should be achieved at an even rate of growth*

Remove this policy

New policy to be added – see page 23 - policy that specifically address the heritage aspects of the built environment in the Plan area or that any buildings/structures in the area have been identified as potential Non-Designated Heritage Assets

- **Policy HO-3** – this Policy is potentially incorrect in its statement of “*those identified in the Site Assessments (Annex A) will be supported ...*”. Our reading of Annex A is that it contains many sites that will not be supported, and therefore the Policy needs to be redrafted to give much greater clarity as to which potential sites for new residential development will be supported (rather than a simple reference to Annex A).  
To be amended  
Suggested: *Development of brownfield sites will be supported over the lifetime .....*
- **Policy HO-4** – again, this Policy needs to make it clear that it applies to proposals for new residential development, and the references to the Housing Needs Survey and Neighbourhood Plan Survey should be improved, for the benefit of users of the Plan.  
Amend: *Any new residential development should address ....*  
Add (*See Supporting Documents – including the reference*)
- **Policy HO-5** – it would be useful if the Policy could give greater clarity as to what constitute “*smaller houses*”, which we would assume to be one and two-bedroom properties. The Policy would seem to preclude flats and apartments, and we would suggest that the Policy be redrafted to refer to “.... dwellings including bungalows”.  
Amend to: *Applications for the development of bungalows and 1&2 bedroom houses or flats or apartments to suit .....*  
To be amended (DN)
- **Policy HO-6** – in many respects, this Policy overlaps with Policy HO-5. *We believe that Policy HO-6 is intended to support the provision of new specialist residential accommodation for the elderly and people with disabilities.* In this case, the Policy should also encompass accommodation provided in Care Homes and other specialist units. We would recommend that the Policy be redrafted, to provide a clear distinction from Policy HO-5 and to provide a clearer definition of the types of accommodation to be covered by the Policy.  
Amend to: *Applications for new residential development that provides suitable accommodation for .....*
- **Policy HO-7** – the term “affordable housing” now has a broader definition under current Government policy. We suggest that the Policy be redrafted to simply support the provision of affordable housing on those sites which are above the threshold for such provision, and to conform more closely to the relevant strategic policy in the Local Plan.  
Amend to: *Proposals that include affordable housing and conforms to the relevant strategic policy in the Local Plan ..... will be supported.*

- **Policy HO-8** – as drafted, this Policy would suggest that rural exception housing will be “*encouraged and supported*”. In practice, there will be parts of the Plan area where such schemes could not be supported, for other policy reasons. We would suggest that the Policy be amended to make it clear that rural exception housing schemes will be supported on appropriate sites and where there is no conflict with other policies in the development plan (including the Local Plan).  
*Amend: .... housing on appropriate sites will be encouraged ....*
- **Policy HO-9** – fundamentally, this is a Design policy, and there is some overlap with Policy HO-1. We consider that the Policy needs to be redrafted to make it clear that it is specifically concerned with the design of new development . Further thought should be given as to whether it also applies to non-residential development, in which case this would also need to be made clearer – and with more informative cross-references to Annexes D, E and F as referred to in the Policy, and which provide the evidence base for the Policy.  
*Amend: Proposals for new residential or commercial development must: ....*  
*Amend format for links to annexes*  
*Replace ‘identikit’ with identical*

## 12. Pages 40/41 – Local Employment and Industries Policies

- **Policy EI-1** – this Policy is not only too broad, but also should probably be placed within the Transport section of the Plan. It needs to give a much clearer indication as to what constitute “*measures will be supported that promote the improvement of ....*”. This is likely to include public transport, highway, footpath, cycleway and energy-efficient transport infrastructure improvements. We recommend that the Policy be redrafted to give greater clarity as to its scope and purpose, bearing in mind that many of the likely initiatives will be implemented by other agencies such as the Highways authority.  
*Move to Transport policies (new T-3)*  
*Amend: Measures will be supported that promote the improvement of .... public transport, highway, footpath, cycleway and energy-efficient transport infrastructure.*
- **Policy EI.2** – again, we are not certain that this Policy is appropriated placed within this section of the Plan. Annex E (at section 3.3) is mainly concerned with car parking provision for residential developments. The Policy has closer links with the Housing policies and we consider that it should be part of an extended and redrafted Policy HO.1 addressing “Design of New Development” – see also Point No. 8 above.  
*Delete this policy and move the objectives to HO-1*

- **Policy EI.3** – this would seem to be the primary policy within this section of the Plan. The designation of Employment Areas will need to be supported, at least by a cross-reference to the Policies Map, and preferably also by a listing of the Employment Areas by name within the Policy itself. The site identified as Location 6 needs to be more accurately described – either as Biggleswade Road East or as Tall Trees, and again be cross-referenced to the Policies Map. We note the policy exclusion of residential development, but would suggest that the policy might also need to establish policy exclusions for other non-Class B types of development, such as Class A Retail development. In that context, the Policy does require some redrafting as described in this Health Check, but also making it clear that it seeks to protect Class B (Employment) sites

Now EI-1

Amend to: Areas that have been designated as ‘Employment Areas’ shall be excluded from housing and retail development .....

- **Policy EI.4** – again, this Policy is more of an aspiration than an effective Planning policy. It should be redrafted to set out how the advances in broadband technology should be implemented as part of new developments in the Plan area, for example by the inclusion of broadband connections to all new residential and commercial developments.

Now EI-2

Now amended to:

*The implementation of advances in broadband and other communication technologies to maintain and enhance the opportunity for effective business and home communications will be actively supported.*

- **Policy EI.5** – this Policy is difficult to interpret. It refers to “*unsuitable town locations*”, without giving any indication as to why such locations are unsuitable. For example, are such locations unsuitable because of environmental impacts, or because there is a wider policy objective that there should be residential redevelopment of such sites? Location 6 needs to be more accurately described, as noted above with regard to Policy EI.3. As drafted, the Policy supports the relocation of “*industry*” which is generally Class B2, but the justification suggests “*light industry*” which is within Class B1. This Policy needs to be redrafted to give much greater clarity as to its purpose, and to its scope. It should also be borne in mind that the Policy may not fully support the Economic theme of promoting Sustainable Development.

Remove this policy

### 13. Page 42 – Transport Policies

- **Policy T-1** – this Policy would benefit from some added clarity regarding the type of development proposals that might constitute those which would “*alleviate congestion and improve traffic flow in Potton*”. As drafted, this might encourage development proposals at locations in the Plan area that would not be regarded as sustainable, e.g. not served by public transport. We suggest that the Policy needs to be re-focused to state that, where appropriate, development proposals should be accompanied by a Transport Assessment to show how the transport impacts of the development will be mitigated, if necessary, by traffic management measures, public transport improvements, etc.

Amend policy: *Where appropriate, development proposals should be accompanied by a Transport Assessment to show how the transport impacts of the development will be mitigated, if necessary, by traffic management measures, public transport improvements, etc.*

- Policy T-2** – our only comment on this Policy is that the reference to Habitats Regulation Assessments in the Policy justification is not relevant and should be removed. (If the concern here is regarding ecological impacts, then that would be addressed by an Ecological Impact statement, but again it is not necessary to state this).  
*Objectives, bullet point three – end with .... to the highway. (remove reference to HRA)*
- Policy T-3** - ~~there is scope to consolidate this Policy with Policies T-1 and T-2 to set out in full, in a single policy, the transport improvements that should be addressed as part of new development proposals – which would seem to include possible traffic management measures, improvements to the pedestrian and cycle network, improvements to public transport and community transport and new transport infrastructure. The phrase “.. unless they contravene any other policy in this plan” is used in Policies T-1, T-3 and T-4. There is no indication in the respective policy justifications as to which policies might be contravened, but we assume that it might refer to Design or Environment policies. It would be preferable if the Plan could give some further guidance on this point, as the Plan user is at present unable to establish whether or not any policies are contravened.~~  
*T-3 replaced by policy EI-1  
 Keep objectives*
- Policy T-4** – this Policy virtually duplicates Policy EI-2 in respect of private off-street car parking, and therefore in our view should be consolidated with that policy (which we consider should be part of an extended Policy HO-1 – see above). However, the justification for Policy T-4 also refers to public car parking in the Town Centre, and we consider that this should be the main focus of the Policy and that it be redrafted to that effect, i.e. to secure improvements to the provision of public car parking in the Town Centre.  
*Amend: Proposals that improve appropriate public car parking in the Town Centre will be supported.  
 Remove bullet point 1 and 3*

#### 14. Pages 44-45 – Environment Policies

- Policy EV-1** – purely for improved clarity we suggest that the title “Potton Green Infrastructure Plan” be stated in full within this Policy, with the appropriate reference to Annex B.  
*Replace GI with Green Infrastructure*
- Policy EV-2** – the second sentence of this Policy is repetitious in that it states “a range of measures” twice, but without referring directly to Annex F. We suggest that the second sentence be redrafted to refer the Plan user to Annex F, where a range of potential measures are described and illustrated. The final sentence of this Policy could then be deleted.  
*Amend sentence thus:  
 Designs and layouts must use a range of measures that must provide mitigation, adaptation and resilience to the impacts of climate change by minimising the vulnerability of the development and its surroundings*

- **Policy EV-3** – this Policy presently seeks to designate eight sites as Local Green Spaces (although the Green Infrastructure Plan suggests that sites 4 (Potton Quarry) and 27 (“Hall for All”) are proposed for designation at a later date as part of a Review of the Plan, in which case the correct total to be now included in the Plan is six, with sites 4 and 27 deleted). As such, the Policy is at present inadequate, and needs to be redrafted to list the six sites by name, with cross-references to the Policies Map and the Green Infrastructure Plan. Furthermore, it would be preferable if the site plans (at a suitable large scale) for the six sites could be included in the main body of the Plan, and be cross-referenced within the text of the Policy.

Remove ‘ These are locations 4, 20, 22, 23, 24, 26, 27, 28.

Start sentence..... As shown in Vision F ....
- **Policy EV-4** – the Policy itself and also the Policy justification should at least provide a cross-reference (for the benefit of Plan users) to the documents which describe the Potton Green Wheel in greater detail. This would appear to be the Green Infrastructure Plan Action Plan in the main.

Add: See Green Infrastructure Plan (Annex B) action plan.
- **Policy EV-5** – as with a number of other Policies, the phrase “*All proposals ....*” is unrealistic in respect of this policy, as technically it would apply to any planning application. The Policy should be redrafted to identify which types of development proposal will be expected to comply with the policy, which in our view would be proposals for new development generally on greenfield sites.

Amend: *All proposals for new commercial or residential development must ....*
- **Policy EV-6** – again, this Policy refers to “*All proposals....*” which is unrealistic, and the Policy should be redrafted along similar lines to Policy EV-5.

  - Amend: *All proposals for new commercial or residential development must ....*

15. Pages 50 and 51 – in view of the helpful and informative summaries provided for Annexes A, B, E and F, the lack of a concise summary of Annexes C and D is somewhat odd, and we would suggest that, if possible, a summary of each document’s contents be provided for the benefit of users of the Plan.  
*Add summaries of Annex C and Annex D (JH?)*
16. Pages 54-59 – on the basis of our suggested revisions to many of the Policies in the Plan, Annex G will also need to be revised to reflect those potential amendments. Annex G is an important part of the Plan, demonstrating the link between the Vision, the Objectives and the Policies, and we see no difficulty in placing that material in the main body of the Plan (possibly at the end of the Policies section on page 45), rather than being confined to an Annex.  
*Update amended policies*
17. Page 59 – **Annex H – Implementation and Monitoring** – again, this is an important part of the Plan, and we would recommend in this case that the material is placed in the main body of the Plan as its final section, to precede the Annexes.  
*Disagree*
18. **General** – we make the general comment that the Plan includes no policies that specifically address the heritage aspects of the built environment in the Plan area or that any buildings/structures in the area have been identified as potential Non-Designated Heritage Assets. Neighbourhood plans are able to do this, and we make this comment simply to remind the Steering Group of the opportunity this presents.  
*We will add a housing policy for this – HO-10*
19. Finally, we recognise that the above comments will involve some redrafting of the Plan and particularly its policy content. However, we commend the time and effort that has clearly been put into the Plan to date and we consider that if the Plan can be amended to incorporate our suggestions then it will enhance the prospect of being submitted in due course for a successful Examination. We have also sought to make suggestions which will improve the document for future users of the Plan. NPSG amendments:
  1. Page 3.....(NPPF - add July 2018)
  2. Page 3 ....Glossary of terms – NPPF National Planning Policy Framework (July 2018)
  3. Page 9 .... Final Plan, Submission and Examination – add: Full details are outlined in *Potton NP – Annex C Consultation*
  4. Page 9 .... Structure of the Plan – Add an extra bullet point (*The implementation and monitoring of the Plan is outlined in Potton NP – Annex H Implementation and Monitoring*)
  5. Page 50 .... Add summary to Annex C:
  6. Page 51 ... Add summary to Annex D: