

# Review of Draft Holt Neighbourhood Plan

Stuart Todd **Associates**

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**Report Authors:**

**Stuart Todd, Director, MRTPI  
Jo Widdecombe, Associate, MRTPI**

**Stuart Todd Associates Ltd.  
[www.stuarttoddassociates.co.uk](http://www.stuarttoddassociates.co.uk)  
[stuart@stuarttoddassociates.co.uk](mailto:stuart@stuarttoddassociates.co.uk)**

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## Introduction

Stuart Todd Associates Ltd. is pleased to have been appointed as a 'critical friend' to provide independent professional planning advice in relation to the draft Holt Neighbourhood Plan (version 2.3) and the process followed to date to produce the draft Plan.

Specifically, we were asked to provide advice in response to the following questions:

1. Is the evidence base sufficiently robust?
2. Is the process we went through satisfactory?
3. Is the use of words correct?
4. Will the Plan meet the Inspector's criteria?

We agreed to do this by:

1. undertaking a diagnostic check of the evidence produced or pulled together to inform the development of the Plan.
2. undertaking a diagnostic check of the process and outputs produced to identify any gaps that should be filled to help ensure that what has been done fits with good practice and meets the requirements of the Neighbourhood Plan Regulations.
3. checking the policy wording of the draft Plan to help ensure that it is drafted in "planning" terms.
4. providing a basic check of the draft Plan against the 'Basic Conditions' used by the Examiner to test the Plan and provide recommendations on where we consider that the Plan requires attention to better meet the test's requirements. We confirmed that there is unlikely to be sufficient time within the contract for a full "compliance check" of policies in the draft Plan with individual policies of the Wiltshire Core Strategy or national planning policies.

This report sets out the response to these tasks by grouping comments and observations in the following sections.

- Vision and Objectives
- Policy Wording of the Draft Plan
- How the Draft Plan fits with the Basic Conditions
- The Fit of the Process Followed with Best Practice
- How Well the Draft Plan is Evidenced

Where we make reference to the "draft Plan", we are referring to version 2.3, produced in December 2014) unless stated otherwise.

The nature of what we have been asked to look at means that there are degrees of overlap between some of the sections in the report, so some recommendations and comments may be repeated in more than one section.

Appendices are also attached which provide the tables used to undertake the diagnostic of the process and evidence base. Where relevant, we have also appended examples of good practice to inform and illustrate our comments as we recognize that it is easier to interpret suggestions for change with existing examples.

We hope that the content of this report are viewed in the way they are intended, as being constructive, and providing the Steering Group with an independent perspective of the Plan and the work that has been done to develop it to date.

The recommendations made in this report cannot guarantee that the Plan will go through Examination, pass the Basic Conditions or receive a “yes” vote at its Referendum but the observations and advice given are intended to help improve the Plan so that its journey through the formal stages of preparation, consultation and scrutiny is easier.

## Format, Structure and Introductory Sections of the Draft Plan

While the current draft Plan has a useful introductory section, there are a number of things which should be included to ensure that the Plan, as a whole, is robust. All plans should provide a practical framework for decision-making in the planning system; and whilst the principal focus of the Government's National Planning Policy Framework (NPPF) is on the policies in a Plan, the introductory sections of a Neighbourhood Plan provide part of the basis for those policies, and should therefore also be clear, if the plan as a whole is to meet the Basic Conditions.

The Plan will, of course, be a public document used by planning practitioners, decision makers and developers as well as the residents of the parish and there should be sufficient information in the introductory section that explains the "why?", "where?", "when?", "how?" and "what?" questions to all of these potential readers – for example, too little local context and those not resident in Holt may not get the gist of the Plan or the picture of the parish; too little on what a Neighbourhood Plan is and its role in the planning system and your residents may not be clear about its role and its limitations. It is important to remember the 'end game' when producing the Plan, for example, what do you need to say to ensure that it is not questioned or criticized and what do you need to include in the Plan to make sure that your residents are clear on what the Plan is about so that it passes the ultimate test, the referendum.

The draft Plan would benefit from reference in the **Introduction** or through the addition of a **Foreword** summarising why the Holt Neighbourhood Plan has been produced (for example, to establish a vision for Holt and to deliver the communities aspirations), what the plan period is (for example, 2015-2026 as the period is usually in line with the Core Strategy / Local Plan's), that it represents and is *the community's Plan* and that it has been produced through substantial consultation locally stemming back to historic, yet relevant, engagement and consultation (for example, building on the foundations of the work commenced in 1998).

The background on how your plan was prepared could be expanded upon, for example, by providing a little more detail about the Steering Group (for example, when it was set up, its composition) with reference to the Terms of Reference (which you may or may wish to append, but they should at least be available to view on the website). This could be inserted on **page 5** of the draft Plan. A new heading such as "How have we developed the plan?" could be introduced before the paragraph which starts "The newly constituted..." and these points set out there. This paragraph also currently refers to the outline of the process being shown, but it is absent at the moment. A short summary, perhaps using bullet points could quickly outline the timeline with the key stages and milestones you have gone through. Including these sorts of additions will help you to 'tell the story' of how you have got from point 'A to Z' in the process. The Plan needs to reflect the thinking and aspirations of the community and experience suggests that Examiners are very keen to understand its meaning and significance.

The draft plan includes a map of the Parish in the section titled "**Geographic scope**", but the map and heading for the section should also refer to the neighbourhood area. This can be

done by simply adding the words “...and the Neighbourhood Area” to the heading and map title. Setting out a brief dialogue outlining the designation details including reference to date when it was submitted under the Neighbourhood Planning Regulations 2012 (part 2 S6) and approved by Wiltshire District Council (May 2013) would also be helpful. Within this section you refer to major development being “about to start”. Any such reference in a Plan which is likely to cover a long time period should be qualified by words such as “At the time of writing...”.

The section currently titled “**Development of the Neighbourhood Plan**” could be beneficially retitled “Background to the Development of the Neighbourhood Plan” as the paragraphs which follow talk mainly about the history of work done in the parish prior to the introduction of Neighbourhood Plans.

Some contextual information is required with regard to how the plan fits in within the planning system (which the draft has done to a certain degree but needs expansion): refer to the Localism Act 2011 amended, and how the neighbourhood plan must be in line with higher level planning policy, European regulations on strategic environmental assessment, habitat regulations and Convention Rights (Human Rights) the National Planning Policy Framework (NPPF), planning practice guidance (PPG), and local policy (Wiltshire Core Strategy adopted January 2015 and any relevant “saved” policies from old District Plans, the relevance of which you should discuss with Wiltshire Council). This could be encapsulated in a section titled “Status of the Neighbourhood Plan and its Role in the Planning System”. A neighbourhood plan, once ‘made’ (brought into legal force) is part of the statutory development plan and planning applications ‘must’ be determined in accordance with the development plan unless other material considerations indicate otherwise. This could also be referenced in such a section.

On **page 4**, the section on the Old Tannery Site is interesting context (and clearly an important development issue to the village) but in terms of the rest of the introductory section it is about a specific issue. It might be worth putting it in a shaded box. If the site’s development is likely to go ahead and is subject to an imminent planning application (as suggested at our meeting with you) much of the focus of the Plan as currently drafted may not be needed, as our comments later reflect, there will be little point in having planning policies in your Plan if the site already has planning consent and details of its development are either approved or likely to be before your Plan is ‘made’. An additional comment on this section is that you probably do not need to append the report of the consultation as stated in the last sentence. Signposting it from the Plan (for example, via a weblink and footnote reference), making it available on the website and including details in your Consultation Statement when you produce it for the Submission stage will probably suffice. The work that the Parish Council has carried out to date, for example, consultation and evidence gathering on The Old Tannery Site, may well prove useful when the Parish Council come to formulate their consultation response to a planning application for the site, so the effort has not been wasted and will inform decision making outside of the Plan context.

It is interesting that you have sought to describe village design statements (VDS) and neighbourhood development orders (NDO) on **page 5**. You do not have to refer to these, but it could be important to do so if they were options considered by the community and



discounted. This detail might just confuse matters if it is not relevant. If you wish to refer to them, for clarity, VDSs are not an option specified by the Localism Act although they are an option within the planning system. They are a practical tool to influence decisions on design and development and are taken into account when planning decisions are made, but are not statutory documents (unlike a neighbourhood plan). An NDO is defined in the Localism Act and can grant planning permission for certain types of development in a neighbourhood area, and follows a similar procedure as a neighbourhood development plan.

You may wish to add a short section conveying the structure of your Plan to set out what readers will find in the Plan and where.

Similarly you should consider introducing a section which briefly addresses how you have dealt with sustainability matters. This could 'signpost' your Sustainability Appraisal (SA) or Strategic Environmental Assessment (SEA) (if you are required, having sought advice from the local authority, to undertake the latter). This section could also help to set out the considerations needed in relation to paragraphs 14 and 16 of the NPPF which define what the Government means in planning policy terms by "sustainable development" and its application to neighbourhood plans.

Moving forward onto the structure of the remainder of the draft Plan, the identification of 'tasks' needs clarification: you should explain that these are outside the neighbourhood plan remit but arise from the local consultation you have collected and have been pulled together to provide a focus for future community action. National Planning Practice Guidance (NPPG) suggests that such tasks or community actions can be set out in a companion document or annex to the Plan. It states that "Neighbourhood planning can inspire local people and business to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider aspirations than those relating to development and use of land can be included in a neighbourhood plan but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex". (Paragraph 004) However, it does not *require* that you do. The important thing is that your tasks or community actions are clearly identified as such and clearly distinguished from the Plan's policies if you decide that they are retained in the main body of the Plan itself. Additionally, relating to the tasks, you should consider (if you have not done so already) whether all of the tasks be implemented within the timeframe of the plan, are you going to prioritise the tasks, who is going to lead and can they commit to that in the Plan and do you know how they are going to be funded?

We have also commented elsewhere in this report on consultation issues. In relation to references in the introductory parts of the draft Plan, the draft helpfully refers to the 2011 survey and how it forms the foundation to certain topic areas, for example Environment, Energy and Green Spaces, but greater emphasis should be made of the more recent consultation, which has been carried out since the work on the neighbourhood plan commenced. You could reference the point that some survey responses have directly informed policies, a point that could also be further emphasised in sections later in the Plan under the separate topic headings.

Likewise, we have commented elsewhere at length on the evidence base. Within the Plan itself, reference should be made in the introductory sections to the importance of the evidence base and sections later in the Plan should refer to evidence base material including consultation responses, data and national and Wiltshire planning policies where there is a direct link and they can be used to help justify your policies. An evidence base overview should be included in the Plan, should be there referring to e.g. the NPPF, planning documents, Parish Council documents and any other supporting information. The evidence base does not need itself to be reprinted as part of the neighbourhood plan, but it should be set out in full on your website.

Monitoring and review of the plan is an important part of the plan making process in terms of how the document is applied and carried forward. A brief section looking at who will do this and how this will be done, in order to help understand how planning applications are being determined in line with the plan and identify areas of weakness in policies would be a useful addition at the end of the introductory section.

We have appended an example of a structure we have recently used to help draft a Plan for other parishes.

## Vision and Objectives

The Vision sets the 'direction of travel' for the neighbourhood plan. In light of that we have the following observations.

A Vision (either a statement or a set of paragraphs) traditionally includes the plan period or target date over which the Plan presides. For example, many Visions will include a phrase starting "By 20XX, YYYYYYY Parish will be a place in which.....".

The bullets in the Vision read more like a set of Aims for the Plan as currently written. We have appended examples of other Neighbourhood Plan Visions so that you can see some other examples.

The Vision relates only to Holt village as currently written, although the Plan is about the whole parish. Is this intentional? If so, some reference to the most important issues being related to the village should be set out in the introductory sections.

At first glance, as drafted, it could be seen to be a little negatively framed. Making a few simple changes to wording could help in really explaining what the community wants Holt to be like within the plan period. For example: *"To promote Holt as a 'village', with farmland and green space in and around the settlement. Encouraging development of a scale that enhances the 'village feel'."*

Typically, the Vision will be aspirational and has been developed from identification of a set of aims, i.e. what is it (within each of your topics or themes) that the Plan is seeking to do (they will typically start with a verb). Also, from a set of fairly broad aims, you can then develop your objectives which will be more specific, interpret those aims and identify the "how" or "what" you are going to do to achieve your aims. We have appended an example of some aims and objectives to illustrate this 'flow' / logic as well as the definitions we use for aims, vision and objectives.

There are examples of the Vision being duplicated as an objective, for example, Traffic Objective 1. Wording could be altered to ensure that the objectives link to land use, for example, to deliver objectives in partnership with the residents, other stakeholders and all necessary statutory authorities (which would relate to delivery of tasks and policies relating to highway safety).

## Policy Wording and Supporting Text

The National Planning Policy Framework (NPPF) states that development plans “ should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (para 17) and contain only policies “that provide a clear indication of how a decision maker should react to a development proposal” (para 154).

Like many neighbourhood plans (and particularly at this draft stage) there are matters of detail to be considered in terms of policy drafting. These can improve the plan by making its policies clearer and more concise, avoiding repetition of Core Strategy policies and ensuring that they relate to development issues. There is a useful guidance note on how to draft well-worded planning policies in your neighbourhood plan, produced by Locality and available online (see the following link - <http://mycommunityrights.org.uk/wp-content/uploads/2012/04/Writing-planning-policies-v51.pdf>) and we suggest that you use it as you review the policy wording in light of our comments.

In short, however, your policies need either to propose development or changes to land-use and / or be able to be used by planning officers and those proposing development through the planning application process to help them determine development proposals – i.e. they will need to be used to help determine the appropriateness or not of planning applications – hence paragraph 154 in the NPPF quoted above. This means that they should be clear and unambiguous and those using your policies but be left in no doubt as to what they are directing or asking for. For example, if you are asking for something, be clear about what it is you are asking for. Equally, anything that you ask for or require that could be understood in a different way to what you intend should be defined so that there is no doubt in an applicant’s or planning officer’s mind what you policy is requiring.

As policies should relate to development proposals and planning applications, policies which use wording such as “This Plan supports...” could be better worded. Worded as they are at the moment they suggest that the policy is more of a statement rather than a ‘guiding rule’ that can be used to help steer the appropriateness or not of a proposal. A more typical phrase that can be used to set the policy intent out appropriately could be “Proposals for development will be supported where they...” which you can follow with one or more criteria which reflect the things you do or do not wish proposals to comply with.

As currently drafted, the policy content does not seem to entirely match the supporting text and this would be worth further review. This should include looking at highlighting the link between policy intent and the evidence or justification for them, which will, in turn make it easier to test the policies against your vision and objectives. Throughout the Plan you need to ensure that your policies are clearly justified by evidence, either from local consultation or written evidence or both if possible. The bottom line is to build your case for policies as strongly as you can and demonstrate that they have come from somewhere and will deal with issues identified locally.

To do this, you can do a combination of things. The first is simply ‘signposting’ key evidence behind a policy. For example, you could include under each of the policy or topic headings,

for example, a brief reference to the relevant section of the evidence. You could make a statement such as this: "Evidence of the extensive research carried out to understand the local transport infrastructure can be found on the web-site. Of particular relevance are a) XXXXXXX; and, b) YYYYYYYY. Also relevant are the responses to the questions x, y and z of the residents survey 2011 which suggest that WWWWWWWW." Alternatively you could set out, in a box, the main pieces of evidence that support the policy, as shown in the example of the structure of a topic section we have appended.

As well as trying better to match your evidence with policies, the second thing you should consider is to provide more interpretation of the evidence you have set out (i.e. what does it mean and how does it demonstrate that you need to policy you have drafted) to provide a seamless lead on to your specific policies. You could then go onto specify the relationship between your policies and Wiltshire Council's strategic policies and NPPF, highlighting how your policies add value and local context and also summarise the key policy links in another box (again, see the example we have appended).

In summary, what you are trying to achieve for each of your policies is to tell the logical story and set out the 'audit trail', which will say:

- a) these are the important things and issues that we have found out from consultation and other written data and evidence;
- b) these are the key messages from all of that (i.e. what it all means);
- c) therefore this leads us to needing a policy which does XXXXX and / or YYYY to respond to or address that issue; and then,
- d) here is our policy;
- e) here are other community actions or tasks which will also help address the issue but which are not within the remit of the planning system; and,
- f) these policies in the NPPF and Wiltshire Core Strategy support the policy we have developed.

a) to c) along with f) provide your justification for the policy. d) and e) deliver your Objectives which in turn are delivering your Aims, which in turn is implementing your Vision.

As stated above, we have appended an example of a structure and content of a topic section that we have recently used in a number of draft Plans for other parishes. This illustrates some of the points we have made above, as do the examples of Plans we have drafted for Stockland (<http://www.stockland.org.uk/ourplan>) and Dunkeswell (<http://www.dunkeswell.net/parish%20plan.htm>) parishes in Devon.

We have some specific comments to make about individual policies and the contextual supporting text, which are set out below.

### Housing

With regard to section 1.4, the text is really about the Wiltshire housing *requirement* rather than housing *need*. We would suggest replacing the word "need" in the heading with the word "requirement". We would also recommend that you have a discussion with Wiltshire

Council and consider including reference to the emerging Site Allocations and built-up area boundary review and planning document.

An example of how your objectives could be tightened up follows.

**Housing objective 1** does not relate well to the extract taken from the vision.

An objective could read:

*We will seek to provide a mix of housing types including smaller homes for the elderly villages wishing to downsize and for young singles, couples or families needing their first home to provide a limited amount of new housing to meet local needs: including a greater range of affordable housing for Holt.*

**Policy H1.1** With regard to The Tannery, it is clear that the redevelopment of this site is a key issue for the community, but due to the impending planning application and timeframe for the 'making' of this neighbourhood plan, we would question whether this policy is applicable. The development of the site may come forward in advance of the Plan, which would render much, if not all, of the policy content irrelevant. We would suggest that the work carried out to date to formulate policies / aspirations relating to the development of this site would be better suited to inform consultation responses on any application submitted for planning approval on this site. For example, contamination could be dealt with via a condition attached to any grant of planning permission for development of the site.

We would recommend that the (Steering Group and) Parish Council focus on commenting on the planning application, raising the issues that have arisen whilst pulling together the emerging plan, for example, housing types / ownership preference highlighted by consultation and emerging policy themes, ask the question about drainage capacity, along with suggesting appropriate conditions that could be attached to any approval to make the scheme more acceptable to the community.

You may still wish to include the important background to the site and reference to the work you have done to help shape development of the site but there is little point in having a policy such as this in the Plan if an application comes forward imminently. The reserve position (an 'option B') might be to remove the policy and if the expected planning application does not come forward before you reach the submission stage, re-insert it at that point. A statement in the next iteration of the draft Plan setting out your course of action in relation to the currently drafted policy would be helpful to 'tell the story' and set up your 'option B' if you need it.

**Policy H1.2** is unclear and ambiguous covering two distinct issues: phasing / allocating sites for affordable housing delivery and specifying occupancy of affordable housing i.e. local connection.

The NPPF (para 55) states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and

should be responsive and reflect local needs". The Plan should clearly show that there is a need for affordable housing in Holt and could include a policy that:

- (a) could specify under what circumstances a percentage of affordable housing provision e.g. on sites where 4 or more dwellings can be accommodated, will be required and that this would be subject to viability;
- (b) the type of affordable housing e.g. should reflect local needs in terms of types, sizes of dwellings, levels of affordability and mix of tenures (justification for policy needs to be strong here using your collated data); and,
- (c) the location layout and design of the affordable housing should create an inclusive development.

It could then lead on to a separate local connection policy, specifying allocation of affordable homes, but be aware of Human Rights. When using policies from other plans, be aware of their context and evidence base: omitting words or phrases could affect the meaning and implementation of the plan.

The relationship to the Core Strategy and strategic policies needs to be reviewed here, to ensure conformity, along with a review of the evidence to support this approach.

**Policy H2.1** The NPPF (para 58) states that : "neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area" and the draft plan should relate to the Core Strategy and any saved policies here, as overarching framework and assess how this policy adds to the principles of quality sustainable design. The policy includes repetition (a) and could be strengthened to improve clarity e.g. how did you arrive at the figures used in (g)? Amended wording e.g. (c) *complements and enhances where appropriate the prevailing size, height, scale and mass, materials, layout and density of the existing surrounding development;*

**H3.1 - H3.3** The wording of these policies could be improved to improve clarity and to plan positively for development in accordance with the NPPF. The policies should focus on providing clear criteria to direct development, rather than focus on what the community does not want. They should relate to the Core Strategy and any saved policies, to ensure that the requirements for general conformity are met.

A policy focusing on gardens might address the issues raised by the community in respect of infill/backland development. This could take the form: *"Proposals for new dwellings on private residential gardens should: (a) not result in unacceptable reduction of green space created by the garden itself or in combination with surrounding gardens AND (b) not result in an unacceptable impact on the landscape and environment value of the site"*. Appropriate evidence and justification would be required to support this policy and reference to the NPPF (para 53) would be useful in this instance.

**Policy H3.2** is likely not to meet the Basic Conditions, due to its negativity. An *exception policy* could be useful here: in guiding development proposals outside the village. We would suggest that you discuss the suitability of Star Ground in more detail in your preamble, and remove reference within the policy, as you are not seeking to allocate a site

here. Does the Core Strategy include a rural exceptions policy that the Parish may wish to provide more guidance on, for example, how the development is expected to integrate within the existing settlement?

**Policy H3.3** It is worth noting that Permitted Development (PD) Rights, established by Act of Parliament and in effect, giving planning permission to certain types of development, allow the change of use of some agricultural and commercial buildings to residential use. Furthermore, in the case of agricultural buildings PD Rights allow alterations to the exterior of the building providing that they are reasonably necessary for the building to function as a dwelling house. These PD Rights do not usually apply to Listed Buildings or in Conservation Areas. Changes which are not covered by PD Rights would still require planning permission. A suggested policy, which reflects this could read: *“Notwithstanding permitted development rights granted by the Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 or any subsequent amendment, and, in order to support farm diversification and the sustainable growth and expansion of businesses, the conversion of existing agricultural and commercial buildings will be supported where it is justified, to promote expansion in the rural economy. The proposed conversions will be expected to satisfy the design criteria in Policy X.”*

The relationship to strategic policies, NPPF and the intention for such a policy would need to be explained.

### Traffic

There is an example of repetition here. **Traffic Objective 1** is simply repeating the vision. We would suggest an alternative: Objective 1 *To improve highway safety.*

**Policies T1, T3 and T4** These policies are vague, for example, “any changes” and the mechanisms for delivery of certain aspects are unclear, such as requiring the provision of a “pedestrian crossing”. We would suggest removing these policies and to highlight them as aspirations of the community. An alternative policy could read: *“Where appropriate, traffic management measures will be encouraged that will improve highway safety. Any measures should be of a design appropriate to the character of the rural area.”*

**Policy T2** We would suggest, based on our earlier comments on The Tannery, that this policy is deleted given that it is unlikely that the policy can have any impact if the planning application is submitted imminently and determined prior to the Plan being ‘made’.

**Policy P1** Are parking standards already detailed in District and County documentation? If so a policy could be used to require applicants to use these guidance documents. Another suggestion, a policy that states:

*Development proposals will be supported only in they include the maximum level of off street parking consistent with the current standards set out in the [for example, Core Strategy]. Developments that reduce the amount of off street parking currently available will only be supported if they make enforceable provision for equivalent off street parking nearby. Parking spaces provided will be required to be made available in perpetuity*



Should you wish to have your local own parking standard which is different to that defined in the Wiltshire Core Strategy / Local Plan, you will need to ensure that your evidence is robust enough to demonstrate why it should be different.

**Policy P2 and Policy OT.1** The policies need to say how this will be achieved, for example, will the Parish bring forward CIL (Community Infrastructure Levy) or section 106 planning obligations money? It is noted on the Wiltshire Council website that the CIL is scheduled for adoption in April 2015 (see the following link on Wiltshire Council's website) <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy.htm>. The draft Plan could benefit from an explanation of the CIL situation, for example, the Plan could include a list of community priorities in terms of additional local facilities to be provided for as a result of new development, which a CIL policy could then follow on from. We would suggest taking a look at paragraphs 071-076 of the NPPG (<http://planningguidance.planningportal.gov.uk/blog/guidance/community-infrastructure-levy/spending-the-levy/>) and 'made' plans such as Broughton Astley and Cringleford, for further advice and examples.

In addition, this and any other policy which requires proposals for development to "take into account" should qualify this by suggesting how this should be done, either in the policy itself or the supporting justification.

#### Commercial and Economic Development

**Policy CE.1** This policy should be worded to improve clarity and a criteria based policy would be useful. For example, *"the neighbourhood plan will support proposals for the development of new B1 businesses, within XXXXXXXXX provided that they:*

- i) *do not harm residential amenity;*
- ii) *etc*
- iii) *etc*

**Policy CE.2** relates to the Tannery issues already discussed above, and should be removed if the expected planning application comes forward before the Plan gets to its pre-submission stage.

**Policy CE.3** raises questions of whether this can be achieved and could be improved to read, for example, *"The continuous improvement of the broadband and internet connectivity to all premises in Holt will be encouraged"*.

**Policy CE.4**, as worded, is not a planning policy and should be included within the text of the neighbourhood plan as an important aspiration for the community.

#### Environment, Energy and Green Spaces

**Objectives relating to the Environment** These need to be reviewed in line with comments made earlier, for example, a suggested alternative to Objective E3 could read: *"Work with*

*relevant bodies to address drainage and flooding issues” and Objective E1: “Ensure that new development is well designed, sustainable and reinforces Holt’s character whilst ensuring that drainage issues are addressed.”*

It should be noted that in cases where particular organisations or businesses are specified in a policy or justifying text, you should ask those bodies if they are happy to be referenced in this way (prior to the formal pre-submission stage).

**Environment Task E3** This is coloured the same as a policy and should be amended for consistency.

**Policy E.1** It is unclear as to the intention of this policy: does this policy apply to all new development including domestic extensions, business premises or is it related to new housing development and therefore already covered in essence, by Policy H2.1 (which could be re-worded to encompass the issue, for example, *“designed to the highest possible standard and make generous provision for open green spaces which are accessible to the public.”*

It is suggested that the intention of the policy be clarified and then consideration given to how more specific policies could be generated, for example, a policy could be added to the commercial and economic section stating: *“Proposals for economic development and premises for business will be supported subject to the following criteria: (a) proposals should not have a significant harmful impacts on the natural and historic environment; (b) ... etc.”*

In terms of extensions and conversions, a policy could read: *“Residential conversions and extensions should be designed to reflect the character of nearby buildings and their settings. This will require particular attention to the choice of materials, the scale of development, roof heights and layout within the plot. The incorporation of features connected with sustainable design (for example, sustainable drainage and porous / permeable surfacing for driveways) will be required where feasible, provided that it is incorporated into an overall design that complements the character of the area.”*

In addition requiring the provision of, for example, cycleways in policies this has to be justifiable, deliverable and not too onerous to render a scheme unviable.

As with all the policies that we have suggested could be used, a review of the strategic policies (to ensure conformity and no repetition) and evidence, would be needed to justify their inclusion.

**Policy E.2** Clarity is required here regarding the intention of this policy. For instance, it implies that all new development (and this would include house extensions) should include some sort of assessment on infrastructure ‘impact’. There might be an element of repetition with the content and intention of other more specific policies. Furthermore, with regard to schools, if there is an issue with regard to school provision, this could justify, for example, a policy which is more specific and seeks the provision and improvement of facilities.

**Policy EN1** Clarity is required here: renewable energy schemes and energy efficiency are related but distinct issues. The first focuses on energy generating infrastructure e.g. solar panels, wind turbines etc. The latter relates to energy efficiency standards e.g. energy efficiency of households. A criteria policy identifying when renewable energy schemes are acceptable is suggested below. An example of an energy efficiency policy for existing development can be found in the 'made' Barnham and Eastergate Neighbourhood Plan.

**Policy EN2** This policy, as drafted, is rather negative and ambiguous. An alternative might be worded as follows: *"Proposals for renewable and low carbon energy generation development will be supported if their impacts are (or can be made) acceptable. The following considerations will be taken into account in assessing proposals:*

- i) visual impact in the immediate locality and wider area;*
- ii) the amenity of nearby houses;*
- iii) etc..."*

As with all of the policies, general conformity with strategic policies will need to be checked.

#### Community Amenities

**Policy CA.1** As worded, this is not a planning policy but a task or community action that you can commit to. However, you could develop a policy which identifies the important community assets in the parish, where this is based upon clear evidence for doing so, and also seeks to retain and protect the use of these given that value. There are examples of such policies in the Stockland draft Plan that we drafted (<http://www.stockland.org.uk/ourplan>).

## How Well the Draft Plan Fits with the Basic Conditions

### What the Examiner will be looking at

The Basic Conditions are particularly important when preparing the Plan as they are the tests which are applied at the Public Examination. You should seek to make sure that your Plan fulfils or meets the requirements in advance of the tests being applied and you are given the opportunity to demonstrate how you feel that your Plan meets the Basic Conditions in a Basic Conditions Statement which you are required to submit for Examination alongside your Plan and other documents.

The Conditions the Plan needs to meet which are relevant to neighbourhood plans are:

- *have regard* to national policies and advice contained in guidance issued by the Secretary of State
- *contribute* to the achievement of sustainable development
- be in *general conformity with* the strategic policies of the development plan for the area- in this case *Wiltshire Core Strategy Adopted January 2015 and any policies deemed as such by Wiltshire Council which have been "saved" from old District Plans*
- be in *compatible with* the European Union (EU) and European Convention on Human Rights (ECHR) obligations

In addition, under Paragraph 8 (1) of Schedule 4B of the Town and Country Planning Act 1990, the Examiner must be satisfied that the following points have been met:

- A. policies relate to the development and use of land for a designated neighbourhood area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- B. the neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (*the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area*); and,
- C. the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Our observations in relation to how far the current draft Plan is likely to meet the Basic conditions are set out below.

### Key Issues

With regard to the Basic Condition requiring the Plan ***to have regard to national policies and advice contained in guidance issued by the Secretary of State***, we have assumed that the relevant national policies and advice are those that are contained in the National Planning Practice Framework (NPPF) and the Planning Practice Guidance (PPG). You should discuss with Wiltshire Council whether they consider that there are other national policies

that you should be aware of in relation to addressing this Basic Condition at the point of submission of your Plan.

We consider that the plan could be improved in order to meet this Basic Condition in terms of:

- overall format/layout which would improve readability (and implementation), and really tell the story of how the plan has developed and what it sets out to achieve;
- the plan needs to show how the national policies and advice of PPG have been considered and relate to the policies that have emerged. For example, a suggested method could be to cite or 'signpost' the relevant paragraphs of the NPPF and associated planning practice guidance under the individual topic headings; and,
- the wording of the policies could be improved to improve clarity and certainty, in decision making, to help ensure that the policies deliver what you intend. The guidance of the PPG (para 041) highlights:

"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."

As referenced above, there is a useful guidance note on how to draft well-worded planning policies in your neighbourhood plan, produced by Locality and available online (here <http://mycommunityrights.org.uk/wp-content/uploads/2012/04/Writing-planning-policies-v51.pdf>) and we suggest that you use it as you review the policy wording in light of our comments.

The draft Plan generally does adopt a positive approach to promoting business growth; encouraging social infrastructure; and contributing to the provision of energy infrastructure, whilst at the same time conserving assets of the natural environment. However, the plan could be strengthened to show how it **contributes to the achievement of sustainable development**. One way of addressing this (assuming that the local authority will not require you to undertake an SEA) is a Sustainability Appraisal (SA) of the Plan and its policies, showing how the plan considers social, economic and environmental issues (see para 7 of the NPPF). This is not a mandatory process, however such a tool has been recognised as good practice by Examiners. Guidance is available online on how best to undertake these sorts of assessments, for example, here <http://www.levett-therivel.co.uk/DIYSA.pdf>. Wiltshire Council has also produced helpful guidance on such matters here <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/neighbourhoodplanning/npguidancenotes.htm>.

We consider that your demonstration of **general conformity with the strategic policies** of the of Wiltshire Core Strategy Adopted January 2015 (and any policies which have been "saved" from old District Plans and are defined as strategic by Wiltshire Council) is a weakness at present: there is limited reference within the plan, in terms of showing how the

draft Plan relates to Wiltshire's strategic policies. To check that there is 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, we would encourage the Steering Group to have a dialogue with officers at Wiltshire Council. A detailed review of the neighbourhood plan policies against those identified as strategic by the local planning authority is required and we would suggest that the draft Plan is revised in light of our comments and in response to the comments received from the last consultation prior to having these discussions.

A suggested method would be to use a table to look at all of the policies of the draft plan and their relationship to those identified as being strategic, which would not only ensure that there is no duplication of policy but provide a way to analyse general conformity. The Roseland Basic Conditions Statement has a useful grid format, that not only looks at strategic policy, but the NPPF and sustainability (see [www.roselandplan.org/the-basic-conditions-statement.html](http://www.roselandplan.org/the-basic-conditions-statement.html)).

With regard to being **compatible with the European Union (EU) and European Convention on Human Rights (ECHR) obligations**, at our meeting we suggested you seek, from the local authority, a screening opinion in relation to the need for a Strategic Environmental Assessment (SEA) and Habitats Directives Assessments and the outcome of this will need to be taken into account in progressing the Plan. It must be demonstrated that consideration has been given to whether the Plan is likely to have significant environmental effects and a statement of reasons as to why no environmental report is required to be submitted with the neighbourhood plan and made available to the Examiner. It is suggested that the best way to do this is via a 'screening opinion', and to consult the statutory environmental bodies: English Heritage, Natural England and the Environment Agency. (Also see para 026-028, PPG).

In terms of ECHR, our attention has not been drawn to any issues arising, but the plan is a work in progress. In relation to relevant Human Rights Article 8 (privacy), 14 (discrimination) and 1 (property), we consider that nothing in the draft suggests a breach to these, as far as we can deduce.

An Equality Impact Assessment (EIA) could be carried out (although is not a requirement), and has been noted by some Examiners as good practice, to highlight the positive benefits of the plan for many parts of the community. Carrying out an EIA involves systematically assessing the likely (or actual) effects of policies on people in respect of disability, gender, including gender identity, and racial equality. This includes looking for opportunities to promote equality that may have previously been missed or could be better used, as well as negative or adverse impacts that can be removed or mitigated, where possible.

With regard to policies relating to the development and use of land for a designated neighbourhood area, the draft Plan's approach to separating use of land and community tasks for the designated neighbourhood area could be improved for clarity, as suggested elsewhere in this report.

With regard to the **Plan specifying the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area'** a key component to the draft is the period which the plan covers and a map of the neighbourhood area. This includes a clear statement identifying the area to which the proposed plan relates. The draft plan is lacking detail in these areas, for example there is no timeframe for the plan: is it the same as the Core Strategy?

From what we have read, it would appear that the plan satisfies the points on excluded development and relationship to one neighbourhood area.

Based on what we have seen in the current draft, although it is a work in progress, we believe that the **neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.**

## **The Fit of the Process Followed with Best Practice**

We have been asked to undertake a diagnostic check of progress made on the neighbourhood plan and its key tasks based on information provided by the neighbourhood plan steering group and our understanding of the position at the current time from verbal discussion with steering group representatives. To assess the process that the draft Plan has gone through to date, we have taken good practice in processes followed by other Plans (and adapted from Locality guidance), together with our own experience of developing Plans, and compared them with the process followed and outputs produced by the Steering Group in producing the draft Plan to date.

Our full diagnostic table is included as an appendix to this report. The aim of the table is to provide some guidance to help the Steering Group continue to develop the plan in accordance with best practice and in order to satisfy Regulations and the “Basic Conditions” (the tests which will be applied to the Plan at Examination). As well as being used as the basis for the diagnostic check, the table can be used as a checklist of tasks that we would suggest are used to ensure that the tasks required to help ensure that a robust Plan is developed are not missed.

The table sets out a logical and mainly sequential process, tasks and outputs but the process is not always as straight forward as this nor followed in the way we have presented. We recognise that the process followed in Holt has accommodated many of the tasks and outputs set out in the table although some have been done or demonstrated only in part. We make recommendations below on the key points which we feel should be addressed but these have been set in the context of ‘we are where we are’ and so for some tasks not completed in full, there are ‘fixes’ that can be applied which mean that you do not have to go backwards several steps to complete them.

Our main findings from the diagnostic are as follows.

### Transparency

There are instances where, although outputs required have been done, they have not been made available on the website. Transparency is very important to the process as a whole and so any such material should be made publicly available on the website and easy to find. For example, while the Terms of Reference are captured in an appendix to the draft Plan, they should be ‘published’ on the website as a stand-alone document. Other documents supplied to us via email should also be made available on the website.

### Project Plan

Apart from the timeline in the draft Plan which is a simple statement of the main things that have been done, a project plan for the remainder of the process should be set out so that residents and others following the Plan’s development are aware of the anticipated timetable for the production of the Plan.



As part of this project planning, the Steering Group should consider how, when and on what they are going to consult, setting out some key steps when this will take place and with whom they will consult.

### Consultation

With regard to consultation already undertaken, the Group should ensure that a record is available which sets out the groups, organisations and Agencies which have already been consulted and the responses they have provided. While it is satisfactory to have anonymised responses from the general public, other responses should quote their source (or full letters for example can be made available online).

We are unsure from what has been made available to us if 'strategic' (or wider than local) consultees / stakeholders have been identified and contacted about the Plan. It is suggested that a list of statutory and strategic consultees is put together with email addresses for each. The Plan can then be commented on by these stakeholders. The list of statutory consultees can be seen here (<http://www.legislation.gov.uk/ukxi/2012/637/schedule/1/made#f00025> ) but others which may not be on this list such as service infrastructure providers, utilities and campaign groups should be contacted too. Statutory consultees will at least need to be consulted at the formal pre-submission stage but could be contacted earlier if their input is considered as important to the Plan's developing policies.

### Evidence

The comments which follow have arisen from our diagnostic of the process you have gone through and further detail in relation to your evidence base content and gaps is included in the section of this report which sets out the results of the evidence base diagnostic.

We consider that more could be done to demonstrate the evidence behind the policies in the draft Plan itself, to demonstrate that the Plan meets the Basic Conditions and to ensure that there is an understanding of the opportunities and limitations of what the Plan can and cannot achieve (see other sections of this report for further details). The most appropriate place in which to set out some further evidence gathering and summary is probably the Scoping Report.

Some survey work has been done according to the timeline in the draft Plan. However, although the survey had a good response rate, it was conducted in 2011 prior to work on the neighbourhood plan commencing (and focused on The Tannery issues), and therefore a link needs to be made between the date of survey results and the continuity provided and progression made by successive further consultation with residents across wider issues. The results of the survey do not appear to be on the website and should therefore be published, as should any analysis of the results which have informed the draft Plan's development.

Given the absence of a more general survey which explores the breadth of planning issues which can be covered in a neighbourhood plan, it is particularly important to show that you have 'opened up' a dialogue with the residents to allow them to come forward with issues

that they feel are important and that you have not simply presented them with a list of issues that the Steering Group feels are important. The two Focus Groups held go part of the way to help demonstrate this, but the low number of people represented could be argued as not equating to represent the views of the community as a whole.

Any comments received at public meetings or other events should be summarised and published. It is important that an “audit trail” of how the Plan’s content has been shaped and influenced by consultation is available. Ultimately, as well as being able to use such information to support your Plan’s policies, it will make the job of producing a Consultation Statement, which must be submitted to the local authority alongside your Plan, much easier.

### Demonstrating your ‘journey’

It is clear that a thought process has been gone through and some analysis of key issues done in order to arrive at the content of the iterations of the draft Plan. However, it is less clear *how* you have done this. It is important that such processes and the results are set out on paper and published as you need to be able to demonstrate how you have got from ‘A to Z’ in your Plan’s development and progressed along the Neighbourhood Plan ‘journey’. Setting out what you have done (for example your timeline) is important in itself, but you should supplement that with the results of some of the key stages, meetings and exercises if you can. You should also document how comments gathered during the process and evidence explored leads you to conclusions that have helped you move forward to the next stage. This all helps to show your audit trail. Ideally, what you should aim to demonstrate is a ‘chain of progress’. The table in appendix A4 provides an example of this logical chain from the start of the process to the development of policies.

It is not clear that you have demonstrated in your audit trail of evidence, where your vision has come from (see other parts of this report for further comments and recommendations in relation to this).

There appears to have been little consultation on draft aims, objectives and a vision before the first iteration of the Plan was published. Consultation on a set of these would usually be the first step to plan drafting, seeking endorsement from the residents to give you the mandate to start to draft the Plan itself. However, there is little point going back a step to consult purely on them as you have had feedback on those aims, objectives and a vision already, ‘we are where we are’. The key thing now is to ensure that you are confident that the aims, objectives and vision have been commented on and ‘signed off’ (or will be in due course prior to the formal consultation stages) and that residents have had the opportunity to help shape them rather than they be presented with what they might consider is a ‘fait accompli’.

### Sustainability matters

As previously discussed, a formal request should be made to the local authority whether or not the steering group thinks a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) is required. The request should only be made when there is

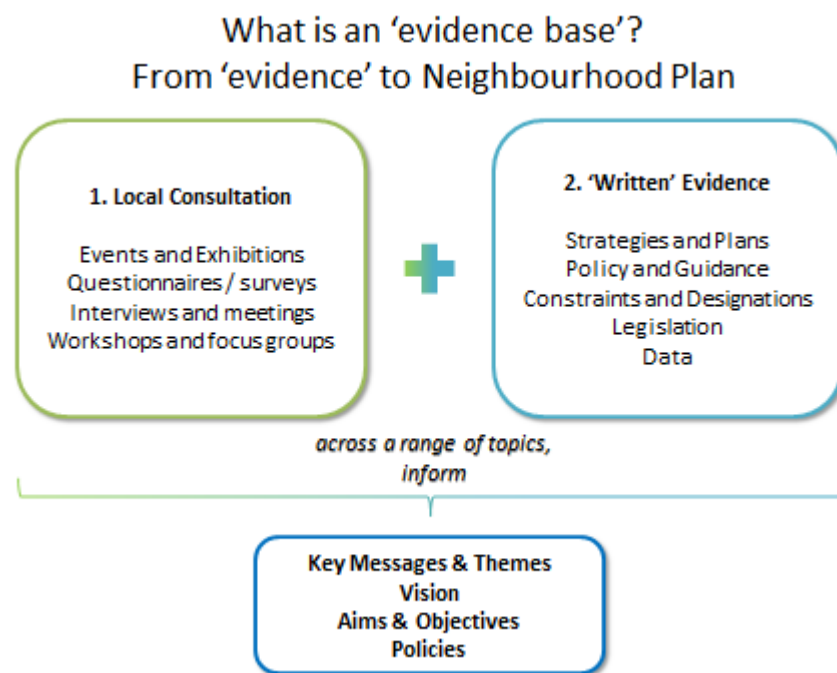
a set of draft aims and objectives (and a vision if one is developed) *that has been endorsed by the community* and an indication of the likelihood of the Plan allocating development sites. We would suggest that you revise the Plan to take into account our comments first before writing, as your inclusion of the policy and proposals for The Tannery site, if you retain them in the Plan, would probably trigger a need for a SEA. If you decide to remove the policy requirements for The Tannery you may be able to avoid such a requirement (although you are still advised to undertake a sustainability appraisal for the Plan - even though it is not a formal requirement - to test the Plan against sustainability indicators and help to fulfil the Basic Conditions).

#### Further local consultation prior to formal pre-submission stage

Depending on the degree to which your latest draft has changed since the consultation version 1.5, and in light of our comments, we suggest that you should allow the community to have a further opportunity to see the next iteration of the draft Plan prior to the formal consultation stage ('pre-submission'). You should also share the next draft with the local authority to help ensure that your policies are appropriately worded and to ensure that you 'fit' with the strategic policies of the Core Strategy and that the Plan is broadly in line with national planning policy.

## How Well the Draft Plan is Evidenced

In order to undertake the analysis of the available evidence base, it is important to set out our definition of what an evidence base is for neighbourhood plans. The evidence for the neighbourhood plan comprises of two main strands of information, that collected locally from consultation and that collated from written information. This is captured in the diagram below.



Having an evidence base for the Plan is important because planning policy and proposals need to be based on a proper understanding of the place to where they relate, if they are to be relevant, realistic and address local issues effectively, and because you:

- Need to demonstrate to others what is important to community;
- Need to understand national and local authority planning policy context, limitations and 'rules';
- Need to underpin the policies of the Plan and overall strategy with 'robust' evidence, building a strong case and justification for their inclusion; and,
- Need to use evidence to help demonstrate that you meet the Basic Conditions, the tests which are applied by the independent Examiner at the Public Examination into your Plan.

Three of the Basic Conditions are of particular relevance to your evidence base. A good evidence base can help you to demonstrate that the Plan has:

- had regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributed to the achievement of sustainable development; and,

- shown that it is in “general conformity” with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Unless policy is based on firm evidence and proper community engagement, then it is more likely to reflect the assumptions and prejudices of those writing it than to reflect the needs and aspirations of the wider area and community. We are also advised that “the evidence base needs to be proportionate to the size of the neighbourhood area and scope and detail of the Neighbourhood Plan. Other factors such as the status of the current and emerging Local Plan policies will influence the depth and breadth of evidence needed. It is important to remember that the evidence base needs to reflect the fact that the plan being produced here will have statutory status and be used to decide planning applications in the neighbourhood area. It is necessary to develop a clear understanding of the neighbourhood area and policy issues covered; but not to review every piece of research and data in existence – careful selection is needed.”<sup>1</sup>

The main findings from our assessment of the available evidence base are set out below. Further detail is set out in the diagnostic table in an appendix to this report.

Our diagnostic of the evidence base for the Holt neighbourhood plan is based on a brief review of the evidence base material provided via email and which is available online at the [www.holtvillage.info/](http://www.holtvillage.info/) website. The list of this available evidence base at the time of the diagnostic is as follows:

- Tannery Site Questionnaire, March 2011
- “Other comments” analysis of questionnaire comments (4 documents), (no date but it is assumed they were prepared in spring / summer 2011)
- Report on the results of the Tannery Site Questionnaire, September 2011
- Agenda and notes of meeting to launch the neighbourhood plan, May 2012
- Leigh Road Focus Group Feedback, August 2012
- The Midlands Focus Group feedback, August (assumed year 2012)
- Scoping report for draft Plan, version 5, January 2013
- Draft version 1.5 feedback (assumed summer / autumn 2014)
- Draft version 1.5 feedback response (assumed summer / autumn 2014)

There is some discrepancy between this list and that given in the timeline and draft Plan. For example, Appendix 3 of the draft Plan is the Holt Traffic Workshop Consultation Report, 2012, which does not appear to be available on the website and has not been supplied to us. Appendix 2 in the draft Plan, the Housing Needs Survey, 2012, is also not available on the website. With regard to the timeline in the draft Plan, there is no evidence on the website, for example, of what was presented at the whole day consultation event on 31<sup>st</sup> May 2014.

In summary, our main findings are as follows.

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<sup>1</sup> Neighbourhood Planning Roadmap, Locality, 2013 - <http://locality.org.uk/resources/neighbourhood-planning-roadmap-guide/>

## Transparency

Not all documents provided are on the website. In the interests of transparency, robustness and to avoid suspicion, it is important that all available evidence documents are made publicly available on the website and easy to find.

## Improving the Extent of your Written Evidence

The Scoping Report, although it sets out some of the written evidence base for the Plan, could present more information to form a more robust report of “written evidence”, including:

- an explanation of how the topics have been derived;
- an understanding of the key relevant policies in the national (National Planning Policy Framework and National Planning Practice Guidance) and local authority planning policy documents (the Wiltshire Core Strategy) for each topic;
- additional statistical data *as necessary*, such as that available from the Office for National Statistics ‘neighbourhood statistics’ website (from the 2011 census);
- information derived from the local authority’s evidence base documents which have informed the development of their Core Strategy. A discussion with the local authority officers may be helpful in identifying evidence base material which might be useful to inform your topics and policies; and,
- evidence such as key constraints and designations maps for the area. The latter might be available from the local authority but there are also sources online (such as MAGIC <http://magic.defra.gov.uk/>, Flood Risk mapping <http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=357683.0&y=355134.0&scale=1&layerGroups=default&ep=map&textonly=off&lang=e&topic=floodmap> and the Heritage Gateway <http://www.heritagegateway.org.uk/gateway/> ) that could be used and mapping from many such sources can be reproduced in the Scoping Report (subject to the Parish Council obtaining a Public Sector Mapping Agreement licence (PSMA) from Ordnance Survey if it does not have one already (see <http://www.ordnancesurvey.co.uk/business-and-government/public-sector/mapping-agreements/psma-licensing.html> ).

## Evidence Derived from Community Consultation

While the absence of a questionnaire exploring the breadth of planning issues presents, in our view, a significant gap in the evidence base, as a draft of the Plan has been shared and commented on, it would be a backwards step to go back and issue a questionnaire to help ensure that sufficient evidence is gathered from the community to inform the Plan’s development. We also note that although two useful Focus Group sessions were held to understand better and confirm key issues, the limited number of people involved could suggest that the views given were not truly representative of the breadth of people and households in the community.

In response to these perceived gaps in evidence and endorsement of that evidence, the key issue is for the Steering Group to have the confidence that the Plan’s contents have been derived from issues raised by the community *as a whole*. The Steering Group may feel that

the responses generated by the consultation on the first draft of the Plan suffice, but this will depend mainly on the breadth of the consultation (i.e. how far and wide the document was shared, amongst local and strategic groups, organisations, those responsible for running services / facilities and businesses as well as residents, and the number of responses received relative to the make-up and number of people and households in the community).

To add this value to the evidence and process, the Steering Group may wish to explore a different approach to the next round of consultation on the Plan. For example, (assuming that there is a further informal consultation on the Plan) as well as making the next iteration of the Plan widely available for comment (and perhaps presenting a summary of its topics / content at an exhibition to demonstrate that you have done everything you can to reach everyone in the community), it may be beneficial to hold an open workshop with residents to ask the 'bottom line' question of "are there any issues that we have missed that we should be dealing with in the Plan?". Asking this and then receiving further endorsement from the community should give the Steering Group the confidence required that it has the community's backing to move forward to the formal stages of consultation starting with the pre-submission round.

