

# **The Great and Little Chesterford Neighbourhood Plan 2019-2033**

**Produced by the Great Chesterford and Little Chesterford Parish Councils**

**Health Check – January 2022<sup>1</sup>: Undertaken by Derek Stebbing BA (Hons) DipEP MRTPI**

## **Summary of Recommendations**

### **1. Process**

- The Great and Little Chesterford Neighbourhood 2019-2033 (GLCNP/the Plan) has been developed by the Great Chesterford Parish Council and the Little Chesterford Parish Council and their Neighbourhood Plan Steering Group. Much work has clearly been undertaken leading to the current draft Plan, which was subject to consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) during March-May 2021
- The GLCNP is accompanied by both a Consultation Statement and a Basic Conditions Statement. These are important documents. Both documents should be updated and finalised prior to the submission of the GLCNP to Uttlesford District Council (UDC). These should take account of any necessary updates, amendments and re-drafting arising from the recommendations contained in this Health Check.
- The Consultation Statement is presently rather too lengthy, and we consider that the number of Appendices should be reduced or consolidated, with major points being addressed within the main body of the Statement.

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<sup>1</sup> This Report is based on the information made available which primarily constitutes: the Draft Neighbourhood Plan, Basic Conditions Statement, Consultation Statement, Housing Land Assessment Report, Housing Site Selection Report, Strategic Environmental Assessment (SEA) Screening Determination Statement, Important Views and Locally Important Views Designation Report, Local Green Spaces Designation Report and letter from Uttlesford District Council (dated 23 March 2021) containing an indicative housing requirement.

- Further liaison with UDC would be prudent to ensure, as far as practical, that the authority is in agreement with the process to date of the GLCNP production and its final content. This is particularly relevant for the general conformity of the GLCNP to the strategic policies of the development plan (and minimising any potential conflicts with the emerging Local Plan).
- In general terms, there is further scope to ensure that there are suitable cross-references within the Plan and Policies to the various supporting studies that form the evidence base for the Plan. This may enable certain parts of the Plan, and some of the accompanying Figures (which are 46 in total), to be reduced.

## **2. Content**

- The GLCNP has a logical structure and format. It is broadly drafted to take into account national planning policy albeit the requirement to plan positively for sustainable forms of development (which is also a Basic Condition) is not sufficiently well addressed within the Plan. This shortcoming should be addressed as a priority.
- At Chapter 4, the GLCNP contains a stated Vision and seven Objectives. However, this section requires some enhancement, with text describing how the Vision and Objectives have been formulated and how they relate to the Key Issues identified in Chapter 3. A significant omission is that the Plan presently fails to include either an Objective or a Policy, or both, setting out how the Plan seeks to contribute to the achievement of sustainable development (which is a national policy requirement).
- At Chapter 5, the principal Housing policy (Policy GLCNP/9) is not fit for purpose and must be redrafted to provide greater clarity and guidance on the locations where new residential development will be supported within the Plan area, with greater encouragement being given to housing development on sustainable sites, such as 'brownfield' sites. The Policy is also weak on its support for Affordable Housing, and presently fails to include a suitable reference to First Homes, which is a national policy requirement introduced during 2021.
- Following the necessary re-drafting and updating of the draft Plan, it is vital that liaison with UDC should be undertaken to ensure and confirm the general conformity of the GLCNP with the current strategic policies of the development plan. A 'Statement of Common Ground' with UDC would be a useful addition to the evidence base, prior to formal submission of the Plan for Examination.

- A Monitoring and Review section should be included in the Plan, possibly as a new Chapter 7, explaining how the policies will be monitored for their effectiveness. This should include a commitment to review the Plan upon the future adoption of the new Uttlesford Local Plan, and which may require the extension of the Plan period beyond 2033.

**Derek Stebbing**  
**18 January 2022**

**Part 1 – Process**

	Criteria	Source	Response/Comments
1.1	Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?	<b>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	<p>Page 2 of the GLCNP indicates that the Parishes were confirmed as the designated area by UDC on 18 June 2015. A map of the designated area is included on page 2.</p> <p>The Basic Conditions Statement should include a copy of the confirmation issued by UDC and any relevant report/minutes relevant to the designation from UDC.</p> <p>On the premise that the confirmation can be evidenced, the necessary requirements would appear to have been satisfied.</p>
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>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	The GLCNP is being produced by the Great Chesterford and Little Chesterford Parish Councils.
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>The Great and Little Chesterford NP (GLCNP) Consultation Statement</b>	<p>A comprehensive Consultation Statement (dated December 2021) has been drafted which outlines the process of the GLCNP production and the various consultation/engagement activities undertaken.</p> <p>The full reproduction at Appendix O (pp. 19-36) of all consultation responses received at the November 2020 consultation stage is not necessary and would be better described within the main body of the Statement by extending the text after paragraph 5.19 (or thereabouts - it should be noted that Section 5 of the Statement contains paragraph numbering issues, and that paragraphs numbered 5.17-5.19 occur twice).</p> <p>Some parts of the Consultation Statement are longer than is necessary. For example, the data set out on pages 13-15 regarding the consultees notified on 28 March 2021 could be consolidated. Conversely, there is insufficient analysis and</p>

			<p>commentary within the Statement of the responses received at the Regulation 14 consultation stage and specifically how/where the GLCNP was altered following consultation.</p> <p>Paragraph 6.12 is not sufficient in this respect.</p> <p>As a more general comment, the Statement relies too much on material, some of which is lengthy, being placed within the Appendices A-T, with related commentary within the main body of the Statement then being too brief. As one example, the material in Appendix A would be better described within the main body of the Statement.</p> <p>It is recommended that the structure and content of the Consultation Statement be reviewed with the objective of improving its narrative on the breadth and extent of consultation activity, reducing the number of Appendices and removing extraneous material.</p>
1.4	Has there been a programme of community engagement proportionate to the scale and complexity of the plan?	<b>The Great and Little Chesterford NP (GLCNP) Consultation Statement</b>	<p>The Consultation Statement provides a timeline for the development of the GLCNP together with comprehensive details (including Appendices) of how engagement with the Parish communities has occurred. In some respects, the Consultation Statement is too lengthy (totalling 97 pages at present), and as noted above we consider that the number of Appendices is probably excessive and could be reduced by shorter references to the topic in the main body of the Statement.</p> <p>Nevertheless, it is clear that the programme of community engagement during 2013-2021 has been comprehensive including Village Meetings, the use of questionnaires, leaflets and newsletters, the use of social media and direct mailings to key partners and stakeholders particularly at the Regulation 14 consultation stage (March-May 2021).</p> <p>Overall, there appears to have been a programme of community engagement proportionate to the scale and complexity of the Plan.</p>

1.5	Are arrangements in place for an independent examiner to be appointed?	<b>No source</b>	<p>There is no information provided on this. Whilst the Qualifying Body has not yet reached the stage of submitting the GLCNP to UDC under Regulation 15, it is advised that discussions could helpfully begin or be scheduled on how to identify a suitable independent examiner.</p> <p>Whilst the general approach is to assess the resumes/CVs provided by prospective examiners, you may also find it helpful in coming to a decision by reading examples of their reports on other neighbourhood plans.</p>
1.6	Are discussions taking place with the electoral services team on holding the referendum?	<b>No source</b>	It is not yet appropriate to put in place arrangements for a referendum after the Examination of the Plan. However, as the Plan continues to advance during 2022 discussions should be held with UDC.
1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?	<b>No source</b>	<p>There is no process presently set out for bringing the GLCNP into force. This could be developed in liaison with UDC.</p> <p>As noted below, the Plan does not contain a clear statement on its future Monitoring and Review. This should be included in the Plan and make clear reference to the potential need to review the Plan as the emerging new Uttlesford Local Plan progresses towards adoption.</p>
1.8	Has a SEA screening been carried out by the LPA?	<b>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	Yes. A SEA Screening Determination Report was prepared for the Plan on 31 March 2021. The Screening Determination Statement was published by UDC on 16 May 2021, following consultation with statutory consultees, stating that the preparation of a SEA is not required.
1.9	Has a HRA screening been carried out by the LPA?	<b>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	Yes. A Habitats Regulations Assessment (HRA) Screening Determination Report was prepared for the Plan on 31 March 2021. The Screening Determination Statement was published by UDC on 16 May 2021, following consultation with statutory consultees, stating that the Plan would not be likely to result in a significant effect on any European site, either alone or in combination, and therefore no further assessment work would be required.

**Part 2 – Content**

	Criteria	Source	Response/Comments
2.1	Are policies appropriately justified with a clear rationale?	<b>The Great and Little Chesterford NP (GLCNP)</b>	<p>The GLCNP is informed by an extensive and comprehensive suite of supporting evidence documents prepared during 2020-2021, together with further documents and surveys undertaken at earlier stages of the Plan’s preparation.</p> <p>An indicative housing requirement for the Plan area between 2019 and 2033 was provided by Uttlesford District Council on 23 March 2021, in line with national guidance contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).</p> <p>The Plan contains a clear Vision and set of Objectives leading to nine draft Policies, covering the key issues identified through community engagement and the supporting evidence documents.</p> <p>However, the Plan would benefit by more rigorous editing of the supporting text that leads to the specific Policies, as there is significant repetition/duplication of material across the Plan. By way of two examples, detailed material on the Historic Environment, which draws to a large extent on an Historic Environment Assessment (2016), is found at paragraphs 3.29-3.45 and at paragraphs 5.5.1-5.5.13. Similarly, landscape character assessment, drawing upon a Landscape Character Assessment (2017), is addressed at paragraphs 3.15-3.28 and paragraphs 5.4.1-5.4.6. We consider that the supporting text for the relevant Policies can generally be shorter, highlighting the key points that justify the Policy, and referring by cross-reference to earlier parts of the Plan and to the supporting studies.</p> <p>As highlighted below (in Part 3), some of the Policies as drafted are presently too lengthy, and there is a need to ensure that they are re-drafted in order that they are</p>

			<p>more succinct and clearer<sup>2</sup> in their wording and purpose so as to aid future effective implementation.</p> <p>There is useful advice to be found here: <a href="https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf">https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf</a></p> <p>Each Policy is clearly identified by a separated and colour coded text box. There is no doubt what constitutes the proposed planning policies, notwithstanding the need to review the supporting text.</p> <p>Overall, with the editing and re-drafting mentioned in this Health Check, the Policies appear to be, in the main, justified adequately within the Plan.</p>
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>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	<p>The GLCNP is supported by a contents table and runs to 87 pages excluding appendices. The document is legibly laid out. There is a clear distinction between the Plan's Policies and the Community Projects (which are set out in Chapter 6).</p> <p>Some of the maps should be reviewed for their relevance to the easy interpretation of Policy requirements. For example, Policy GLCNP/1 relies upon the interpretation of eight separate maps, and this will not be straightforward for future users of the Plan.</p> <p>Subject to the amendments and re-drafting (as recommended), there is sufficient clarity as to what is the GLCNP and what will be the subject of future Examination.</p>

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<sup>2</sup> See PPG Reference ID: 41-041-20140306.

2.3	Are there any obvious conflicts with the NPPF?	<b>The Great and Little Chesterford NP (GLCNP) and Basic Conditions Statement</b>	Section 3 below identifies matters of potential conflict with the NPPF which should be resolved. Most importantly, in our assessment, the Plan itself fails to provide a clear statement and/or Policy to demonstrate how it seeks to contribute to the achievement of sustainable development.
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?	<b>The Great and Little Chesterford NP (GLCNP) and Basic Conditions Statement</b>	<p>Although this matter is covered albeit relatively briefly at Section 3.2 of the Basic Conditions Statement, there is no clear statement within the Plan itself, as noted at 2.3 above.</p> <p>Subject to revision, and the addition of a suitable Objective and Policy, the GLCNP should be able to demonstrate how it will contribute to the achievement of sustainable development.</p>
2.5	Are there any issues around compatibility with human rights or EU obligations?	<b>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	<p>The Basic Conditions Statement (at Section 3.4) addresses adequately the compatibility of the GLCNP and its production with regard to human rights and EU obligations. However, that section of the Basic Conditions Statement is rather brief and could be extended by some additional narrative that supports the statements made therein.</p> <p>From an assessment of all the documents received there would appear to be no outstanding issues regarding compatibility with human rights and EU obligations.</p>
2.6	Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?	<b>The Great and Little Chesterford NP (GLCNP)</b>	The GLCNP Policies appear to avoid dealing specifically with such excluded development.
2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets	<b>The Great and Little Chesterford NP (GLCNP) Basic Conditions Statement</b>	There is no evidence to yet demonstrate a clear consensus (or otherwise) between the Parish Councils and Uttlesford District Council. (In this respect, the letter dated 23 March 2021 received from the District Council should not be regarded as providing consensus on all strategic policy issues). This should be remedied (by further minuted meetings/correspondence with the District Council) ideally before

	the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?		<p>any further consultation and certainly before the Plan's submission. Any areas of obvious disagreement should be obviated or minimised. A Statement of Common Ground would be helpful in view of the current position with regard to the emerging new Local Plan, which is still at a relatively early stage.</p> <p>It cannot be concluded at the present time that there are no potential issues of general non-conformity (i.e. disagreement) with the strategic policies of the current Local Plan (2005/2007). This matter could be addressed in due course with an update to the Basic Conditions Statement (at Section 3.3).</p> <p>Advice on the issue of 'conformity' is available <a href="#">here</a>.</p>
2.8	Are there any obvious errors in the plan?	<b>The Great and Little Chesterford NP (GLCNP)</b>	Some suggestions to rectify omissions and errors in the Plan are made in Part 3 below.
2.9	Are the plan's policies clear and unambiguous and do they reflect the community's land use aspirations?	<b>The Great and Little Chesterford NP (GLCNP)</b>	<p>Detailed comments are made below on the content and drafting of each of the GLCNP's Policies.</p> <p>A number of the Policies are too lengthy and lack precision. We advise that <u>all</u> of the Policies be reviewed in light of our detailed comments, and where necessary be re-drafted to ensure that they provide clarity and conciseness for future users of the Plan, in order that they can be effective in their implementation.</p>

### **Part 3 - Detailed Comments**

1. These detailed comments address all matters, both of significance and of a more minor nature, across the current GLCNP and are presented in page order.
2. Page 8. Paragraph 1.19 - An updated position on the emerging new Uttlesford Local Plan should be included here, with the projected dates for its submission for Examination and Adoption.
3. Page 9. Title and paragraph 1.20 – The correct title is Habitats Regulations Assessment.
4. Page 14. Paragraph 2.29 is incorrectly numbered.
5. Page 17. Figure 2.6 could be improved by notating the Ickniel Way Trail, as referenced in paragraph 2.38.
6. Pages 19-21. The socio-economic characteristics of the Plan area are described in much less detail than other contextual factors, such as landscape and wildlife. Further information on employment and housing patterns would be helpful. For example, is agriculture and related industries an important source of employment? Similarly, some text to describe the recent housing growth shown in Table 2.6 would be useful.
7. Page 23. Paragraphs 3.1-3.4 should again be amended and updated to reflect the latest position with the emerging new Uttlesford Local Plan.
8. Pages 23-30. Chapter 3 is rather dominated by issues arising from the Landscape Character Assessment and the Historic Environment Assessment. It is surprising that there are no references to primary health care; public transport improvements; farm diversification schemes; retail provision; and biodiversity enhancement, and only very limited references to local employment growth and improved recreation and leisure facilities, as being key issues identified across the Plan area, especially as some of these issues do lead to Policy references in the Plan and some of the Community Projects. We advise that Chapter 3 be reviewed in order that it does identify the key issues affecting the Plan area and reduce some of the more descriptive/historical material presently within this chapter. Where appropriate, references can be made to the Plan's supporting studies and consultation responses.

9. Page 31. Chapter 4 – Vision and Objectives. This section requires some enhancement, with text describing how the Vision and Objectives have been formulated and how they relate to the Key Issues identified in Chapter 3. A significant omission is that the Plan presently fails to include either an Objective or a Policy, or both, setting out how the Plan seeks to contribute to the achievement of sustainable development (which is a national policy requirement). In this respect, it is difficult in some areas to align the statements at paragraphs 3.2.1-3.2.6 of the Basic Conditions Statement with the actual content of the Plan, and particularly with the Vision and Objectives.
10. Page 32. Chapter 5 – Overall Spatial Strategy. The supporting text (at paragraphs 5.1.1-5.1.12) for Policy GLCNP/1 is, in some areas, generally repetitive of the material presently contained in Chapter 3. The distinctive and important historical and landscape features, which help to define the overall spatial strategy, should be described more succinctly, and again with appropriate references to the supporting studies.
11. Pages 36/37. Policy GLCNP/1 (Overall Spatial Strategy). As drafted, this Policy is too lengthy, and parts of the text are descriptive in nature rather than being an effective land use planning policy. The Policy presently relies upon a detailed interpretation of all of the information contained on Figures 5.6-5.13 (on pages 37-43) in order to understand how the Policy might apply to various areas. The Policy itself and its supporting maps need to be simplified for the benefit of future users of the Plan. We consider that the main elements of the spatial strategy can be shown on one, or possibly two, maps at a scale similar to that used for Figure 1.1 on page 7. The Policy text needs to be redrafted to state, in summary, what the major environmental and heritage constraints to development in the Plan area are, and where the principal areas are for appropriate new development. This should build upon the first paragraph of the Policy. As a neighbourhood plan, this Policy (and all Policies in the Plan) can only indicate where development will be supported or not supported, as the Local Planning Authority for the determination of planning applications in the Plan area is UDC. The words “permitted”, “approved” and “refused” are not appropriate to be included in Policies.
12. Page 46. Policy GLCNP/2 (Settlement Pattern and Separation). Although shorter than Policy GLCNP/2, this Policy again relies upon the interpretation of five maps for a full understanding of its purpose. This reinforces the need, referred to above, to consolidate the maps supporting Policy GLCNP/1, which can then be referenced in this Policy. The Policy requires some minor re-drafting, primarily to remove the word “permitted”.
13. Page 50. Policy GLCNP/3 (Getting Around). This is another lengthy Policy and, in our assessment, the second half of the Policy commencing “*Where directly ...*” can be placed satisfactorily within the supporting text to the Policy to identify the various off-site contributions and infrastructure works that will be sought across the Plan area. This can be cross-referenced within the Policy (e.g. “as listed at paragraphs 5.3.xx-5.3.xx”). No other significant re-drafting of the Policy is necessary.

14. Page 59. Policy GLCNP/4 (Landscape Character and Locally Important Views). In our assessment, this Policy is covering two distinct topics, and would be better split into a Policy addressing the preservation and enhancement of important landscape characteristics and a further Policy confined to protecting the locally significant views, a number of which are within the villages (i.e. the built environment). This would then follow the split adopted in the supporting text and would enable the maps supporting each of the Policies to be better related to each of them. Again, the Policies should exclude the word “permitted”. Both topics covered by the suggested two Policies are supported by relevant and comprehensive supporting studies, and in the case of the Important Views and Locally Important Views Designation Report a fuller narrative at paragraph 5.4.10 would be beneficial.
15. Page 62. Policy GLCNP/5 (Historic Environment). As drafted, this Policy simply lists eleven bullet point statements, some of which are not inter-related. The Policy therefore needs to be re-drafted to state that “Development proposals in the Plan area should take account of the following matters relating to the historic environment.....” to be followed by summary points of the principal elements, of which the Conservation Area, Scheduled Monuments and other listed heritage assets are the most important. The Policy should not repeat matters relating to the locally important views (see above). As drafted, the final bullet point in the Policy is excessive, and it is doubtful whether it has due regard to national policy in its current form.
16. Page 70. Policy GLCNP/6 (Valued Community Spaces). This is a much shorter Policy and can be commended for its conciseness. It is well drafted but could be further improved by a cross-reference to the list of spaces and facilities listed at Page 68. To avoid any misunderstanding by future users of the Plan, it is suggested that the term Valued Community Spaces be extended to “Valued Community Spaces and Facilities”, at least in the Policy and its title. The Policy should also be checked with UDC to ensure that there is agreement with regard to consistency with Policy RS3 of the adopted Local Plan.
17. Page 73. Policy GLCNP/7 (Local Green Spaces). This is another concise and well-drafted Policy. We advise that the word “acceptable” be replaced by the word “supported”. We are satisfied (from the Consultation Statement at paragraph 5.19) that the owners of all the Local Green Spaces have been notified of the proposed designations, and that the landowners have been given the opportunity to make comments and representations. The Policy should, however, make clear that development on Local Green Spaces should be consistent with those for Green Belts (NPPF paragraph 100) and this reference might be inserted into the second sentence of the Policy.

18. Page 75. Policy GLCNP/8 (Employment). As drafted, the Policy presently comprises three bullet-point statements. The Policy therefore needs to be re-drafted (along the lines of our suggestion for Policy GLCNP/5) with wording such as “Proposals for new employment development will be supported at the existing employment sites identified on Figures 5.37 and 5.38. Proposed developments at the Chesterford Research Park will be supported subject to .....”. This can then be followed by a separate clause similar to the first bullet point, and a final clause similar to the third bullet point. However, we note that the Policy does not refer to potential new employment opportunities arising from farm diversification schemes. This may be an area that the Plan should cover, and we advise a discussion with UDC on this point to ensure that any further Policy references generally conform with strategic rural development policies.
19. Page 80. Policy GLCNP/9 (Housing). This is unfortunately a poorly drafted Policy and fails to provide sufficient or clear policy guidance for users of the Plan. The Policy needs to be re-drafted to identify where new residential development will be supported in the Plan area, which includes the three allocated sites at Chest 9, Chest 12 and Chest 13. However, other development opportunities will certainly arise up to 2033, for example by the redevelopment of some ‘brownfield’ sites or by some acceptable infill developments. Although the Plan seeks to provide opportunities for 99 new dwellings in the Plan area, and therefore meets the housing requirement set out in the letter from UDC dated 23 March 2021, the Plan should also support and encourage the development of other new housing schemes at suitable, sustainable locations in order to have regard to national policies and in order to boost housing supply. The Policy also needs to give greater support to the provision of Affordable Housing (especially given the restrictions on Exception sites, in Policy GLCNP/1 and Policy GLCNP/2), and in this context the Policy must now include a statement that supports the provision of First Homes (which is a recent Government initiative aimed at broadening the range of Affordable Housing tenures). The cascade approach to the occupation of Affordable Homes set out in the fourth bullet point should be checked with UDC, as it may be contrary to the housing allocation policies of the District Council. It is certainly contrary to elements of the national First Homes policy, referred to above. Additionally, the justification for what could be considered arbitrary percentage limits in bullet points 1 and 2 need to be clearly identified. Liaison with UDC on the contents of the current policy is recommended.
20. Page 81. Policy GLCNP/9.1 (Land opposite Rectory Barns (Chest 12)). Our only comment on this housing site allocation is whether the quantum of up to 10 dwellings will include any Affordable Homes, and if so whether that should be stated.
21. Page 82. Policy GLCNP/9.2 (Land North of Bartholomew Close (Chest 13)). We note that a full planning permission has already been granted for development at this site. Again, it is not clear on this housing site allocation whether the quantum of up to 13 dwellings includes any Affordable Homes, and if so whether that should be stated.,

22. Page 84. Policy GLCNP/9.3 (Land South-West of London Road (Chest 9)). We note that an outline planning permission has already been granted for development at this site. The same point arises on this housing site allocation as to whether the quantum of up to 76 dwellings includes any Affordable Homes, and if so whether that should be stated.

### **General**

23. An omission from the Plan is that it does not include a section and a commitment to the monitoring and review of the GLCNP, which could be located as a new Chapter 7 at the end of the Plan. To accompany this, it might be helpful to devise some indicators to measure the success of the GLCNP in applying the policies and in securing its Objectives and, ultimately, the Vision.

24. We recommend that a thorough proof-read and sense check be made of the draft Plan and its supporting documents, as we have identified some areas of repetition and duplication which should be reduced.

25. The draft Plan contains 46 Figures, generally maps, which is a very large number. As noted above, some Policies rely on the interpretation of multiple maps to fully understand their purpose and extent. Every effort should be made to reduce the number of maps, where that is possible, for example by not repeating maps that can be found easily in supporting studies. More importantly, the maps linked to key Policies, notably Policies GLCNP/1 and GLCNP/2, should be consolidated and reduced in number, for ease of reference by Plan users.

26. The draft Plan would also benefit by the inclusion of a few suitable photographs, possibly as an introductory page to each chapter, to reflect some of the important features of the Plan area.

27. It is surprising that the Plan makes very few references to biodiversity enhancement, which is now a key element of national policy as contained in the Environment Act 2021. This could be rectified by a Policy (supported by appropriate justification) along the lines of:

#### **“Policy GLCNP/- Biodiversity**

Development proposals that incorporate design features and habitat which provide *net* gains to biodiversity will be supported *in principle...etc*”.

28. Finally, it is recognised that the above comments will involve amendments to the GLCNP. However, the time and effort that has clearly been put into the Plan to date is noteworthy. The Plan is logical and straightforward in its structure and if it can be amended with regard to the above suggestions then it will have an increased likelihood of ultimately being submitted for a successful Examination.

**Derek Stebbing**

**Examiner**

**18 January 2022**