

Swanton Morley Neighbourhood Plan
Reg.16 comments

From: Breckland District Council

General: while welcoming the production of the plan, specific consultation with Breckland Council (Breckland Council) has been very limited and this is only the second opportunity it has had to make any comments on the content of the plan, hence the inclusion of both technical and policy comments, based on the adopted LDF.

Page and Policy/ Paragraph No	Comment	Justification	Suggested amendments
Consultation Statement (CS)	Although this reports on changes that will be made to the Reg.16 Plan, a number of them have not been made.	Missing Consultation Statement amendments.	See document reference in the 1 st column, highlighted in grey, where this has occurred.
Whole Plan	As previously advised, text that is justified on the right hand side can cause problems for people with visual disabilities.	<i>Text should be left aligned. Text that is centred or aligned on the right could be missed.</i> Accessible information on clear print (Sensory Trust information sheet).	Remove justification on the right hand side.
Whole Plan	As previously advised at Reg.14, referencing within the plan could be developed to make it much clearer what is being referred to e.g. make reference to the paragraph No, not just the document.	To aid the use of the document by the examiner and planning inspectors. Reference to this being in the Basic Conditions is not adequate, as this document is not part of the development plan and only refers to the NPPF.	See comments below. p31, para 6.20, p37, para 6.41, p41, para 6.58, p44, para 6.76, p46, para 6.84, p49, para 6.100, p54, para 6.122, p56, para 6.132, p58, para 6.138, p60, para 6.158, p65, para 6.167, p67, para 6.180, p70, para 6.189, p72, para 6.198, p78, para 6.221, p80, para map 6.235, p82, para 6.243, p85, para 6.257, p87, para 6.267
Whole Plan	Still, need to be consistent when referring to organisations e.g. Both “Breckland District Council” and “Breckland Council” are used intermittently.	Missing Consultation Statement amendments.	Add “Breckland District Council” to the Forward, para 4th; para 631 p 123 x3, p124 x1

Whole Plan	As previously advised, the key and other information is missing from a number of the maps e.g. what the lines represent etc; north rose etc.	Referencing	Add the details where this is missing – see e.g. p11, Map 2; p32, Map 4; p39, Map 6; p53, Map 8; p51, Map 7; p61, Map 9
Whole Plan	As previously advised, there is still concern that policies within the draft NP been not been considered against the appropriate viability testing, particularly where additional housing sites have been allocated	<i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable”</i> .Para 174 NPPF.	Provide evidence for the appropriate viability testing.
Front cover	As previously advised, the plan period proposed runs to 2037. The emerging Local Plan has a plan period to 2036. It would be useful if the plan period aligned with the emerging Local Plan.	Consistency with the emerging Local Plan and agreed countywide development plan end date. (Also the same applies to para 1.5.1 & para 7.1).	Amend plan period to end in 2036.
p2	Welcome the availability of the plan in other formats.		
p3, Forward, para 4, 2 nd sentence	The word ‘ <i>District</i> ’ is missing from ‘ <i>Breckland Council</i> ’.	Missing Consultation Statement amendment.	Add ‘ <i>District</i> ’ between ‘ <i>Breckland</i> ’ and ‘ <i>Council</i> ’.
Page 7	Where it explains what Policy 1 is for, a better explanation could be used.	Negative language.	Policy 1 is about maintaining the individual identity of Swanton Morley and preventing coalescence between settlements to protect the green and rural character of SM at its outer edges.
p10, para 1.5.2, 1st sentence	As previously advised, it is not Parish Council’s responsibility to monitor the Neighbourhood Plan; this is a District Council responsibility. The Parish has subsequently supported the need to work together, but the plan has not been amended to reflect this.	Breckland Council are looking to agree an approach and work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach. Text in para 7.6 is more appropriate.	Delete “ <i>...and to monitor delivery</i> ”. Or add ““ <i>...and to work with Breckland Council to monitor delivery</i> ”.
p11-16, para	While the history is interesting, this section		Move to an Evidence Basic Document

2.1-2.6	would be more appropriately located in an evidence based document.		for the Reg. 16 Consultation.
p11, Map 2	The key does not identify all the boundaries shown. Also the colour in the key is not clear as looks like it is the same, if not similar, to the colour also used to identify the county boundaries. Also north rose is missing.	Referencing	Use a more distinct boundary colour. Add north rose.
p22, para 3.8.2	The change was to <i>state 'Applications for planning permission must be determined in accordance with the Development Plan'</i> , but it now just slightly amends the text ' <i>...become the which is starting point</i> '.	Different Consultation Statement amendment.	
p24, Para. 4.6 objectives	Reference to 'historical assets' is not the correct planning terminology.	Policy consistency	More appropriate to refer to <i>'designated and non-designated heritage assets'</i> .
p28, para 6.8	The change was to add <i>"...and has been passed to the parish council for consideration and, if required, action..."</i> , but it now states <i>"<u>Details of these have been passed to the Swanton Morley Parish Council to include, if deemed appropriate, in future projects.</u>"</i>	Different Consultation Statement amendment.	
p30, Policy 1	In order to give clarity about the status of boundary, add word <i>'designated'</i> in brackets before <i>'settlement boundary'</i> .	To add clarity to the policy.	Add word <i>'designated'</i> in brackets before <i>'settlement boundary'</i> .
p32, para 6.24	As previously advised, the approach of identifying a number of potential sites is part of the "normal" planning making process.	Planning practise and referencing	This should also be amended to made clear to reflect reality and remove end of 1 st sentence starting 'this has resulted...'
p32, Map 4	North rose is missing.	Referencing	Add to map.
p34, para 6.33	The change was to add a reference to reflect the housing supply (study) published in November 2017. This change	Different Consultation Statement amendment.	Amend as agreed in CS " (<i>Published in July November 2016</i>)

	has not been made.		
p34/5, 6.33 and 6.34	It is appreciated that this has been updated since the regulation 14 consultation, in response to our comments. The five year land supply statement has again been updated, and therefore a further is required to avoid the sentence becoming out of date.	To avoid document becoming out of date quickly.	Delete paragraphs 6.33 and 6.44. Re place with: <i>'Breckland Council has a duty through the National Planning Policy Framework to prepare a five year housing land supply statement. The statement is updated on an annual basis and is available on the Council's website.'</i>
p37, Policy 2 Growth in the Right Places	As previously advised, the policy justification does not make it clear why these sites have been chosen over other sites which have been promoted. It appears to have relied upon the level of public support. This is an additional allocation in comparison to the emerging Local Plan. Whilst this can occur under the "Basic Conditions", it is not clear how alternative options have been assessed. The sustainability appraisal does not appear to have been used to assess alternative options.	The strategic environmental assessment of plans and programmes requires the assessment of reasonable alternative options.	Show assessment of alternative site options.
Policy 2	Also as previously advised, it is not clear how consideration has been given to the infrastructure capacity to support this additional level of growth beyond what is being planned for through the emerging Local Plan, in light of the comments below.	Clarity	This needs to be clarified.
Policy 2	As previously advised, the policy also does not clarify how many dwellings the sites are proposed for.	Clarity	Clarify the level of housing allocation proposed for each site.
p39, Map 6	As previously advised, the key is still missing.	Missing Consultation Statement amendment.	Add to map.
p40, para 6.54	It needs to be clarified why dwellings on	Not explained/justified anywhere.	Amend to explain why only 1.5 stories

	the boundary (not border) of site LP(098)016 must be a maximum height of 1.5 stories.		would be acceptable.
p41, Policy 3	It needs to be explained why these sites need to be <i>'in conjunction'</i> .	To enable implementation.	Clarify in policy.
Criteria a)	Why are 40 spaces required, when the housing numbers have not been confirmed? Does this meet the NCC Highways Parking Standards?	What is the evidence base for 40 spaces?	Clarify
Criteria c)	It needs to be clarified why dwellings on the boundary (not border) of site LP(098)016 must be a maximum height of 1.5 stories.	Not explained/justified anywhere.	Amend to explain why only 1.5 stories would be acceptable.
p42-43, para 6.60- 6.72	As previously advised, this Policy seeks to introduce a local connection criteria on 33% on dwellings secured through S106 agreements. All properties should be allocated in accordance with the Council's Allocation Policy. The Council's Allocation policy is set in accordance with the legal requirements and then approved and agreed by the Council. To add further local connection criteria outside of the policy would not only be contrary to the Council's Allocations Policy but also contrary to the legislation to which Local Authorities must conform to.	Housing authorities are required by the Housing Act 1996 s166A (as amended by the Homelessness Act 2002 and the Localism Act 2011) to have an allocation scheme for determining the priorities and defining the procedures to be followed in allocating affordable housing accommodation. By law Local Authorities must award 'reasonable preference' to certain categories of applicant. The Allocation Policy must set out who can access the housing register and how accommodation is allocated in the District. This is to ensure that the Council meets its legal obligations In addition, Paragraph 47 of the NPPF requires local planning authorities to ensure that their local plan meets the full, objectively	In light of comments on Policy 4, delete all references to " <i>A Local Letting Policy</i> ".

		assessed needs for market and affordable housing in the housing market area. Policy DC4 of the Councils adopted plan fulfils this.	
p42 6.61	As previously advised, average is a very vague term.	Figures may be subject to challenge from those who disagree.	Specify which type of average has been used
p42 6.63	As previously advised, comment about local people unable to access the dwellings is incorrect.	Local people on the housing register were able to bid for these homes in the same way as anyone else on the housing register.	Remove comment or rewrite to reflect that homes were let to people in highest priority, in accordance with the District Council's Allocations Policy. .
p42/3 para 6.68	An amendment is required regarding the number of affordable homes.	To provide 34 affordable homes assumes firstly that the policy will remain unchanged at 40%, and secondly that no affordability issues are identified on any of the 3 sites.	Reflect that a maximum of 34 affordable homes will be delivered, subject to onsite viability, and to policy DC4 remaining unchanged throughout the life of this document.
p42/3 para 6.68	Also mended text is supposed to explain how calculation of the number to match local need, but just states ' <i>actual number to be based on calculated based on identified need recorded on the housing register and recognising that..</i> '	Missing Consultation Statement amendment.	
p4 para 6.69	Explicit clarity is required that households must have been accepted onto Breckland's housing register at the time of allocation.	Clarity	Make this explicit both in text and any policy, subject to comments on Policy 4 below.
p44, Policy 4 Local Lettings	As previously advised, it is important to note that the Housing Needs Survey used to inform the local lettings policy and percentage requirements was under taken to identify housing need in the area in terms of providing a potential rural exception site. As per paragraph 54 of the NPPF rural exception sites allow affordable housing to be provided in rural areas (in perpetuity) on sites that ordinarily would not	The inclusion of the local lettings criteria is in conflict with policy DC4 of the adopted Local Plan which seeks to ensure that Affordable Housing is secured to meet the affordable housing needs of Breckland as identified in the Strategic Housing Market Assessment. Also this is a housing policy not a	Delete policy - not only does it prevent the Local Authority from complying with legal requirements it also is in conflict with the adopted development plan.

	<p>be permitted for development to meet specific identified rural housing needs. This often allows housing needs that go beyond the statutory housing definition of housing need to be met-giving those with a local connection but lower level of housing need when assessed against the statutory criteria set out above a greater opportunity to access affordable housing in the village/parish.</p> <p>It appears that the exception site model and the discretion allowed in terms of rural exception model has been confused with affordable housing secured as part of planning obligations to meet the fully objectively assessed need (FOAN).</p>	<p>planning policy – planning cannot control who is ‘housed.’</p>	
p44, Policy 4	<p>The change was to add <i>“The requirement to Breckland District Council’s housing register”, and ‘employed’</i> but it now states <i>“on Breckland District Council’s housing register” and there is no inclusion of ‘employed’.</i></p>	<p>Different Consultation Statement amendment.</p>	<p>Still lacks clarity.</p>
Policy 4	<p>Also not clear where the <i>‘Add text to explain the requirement to be on the Breckland District Council’s housing register’</i> has been placed.</p>	<p>Clarity</p>	
p45 para 6.80	<p>As previously advised, in the context of Policy DC5 ‘local’ is the parish or adjacent parishes with need.</p>	<p>Clarity</p>	<p>Amend to reflect this.</p>
p46, Policy 5, Affordable Housing on Exception Sites Criteria a)	<p>As previously advised, as the Local Planning Authority, it is the legal responsibility of the Breckland Council, to make this decision, not the Parish Council.</p>	<p>Policy DC5 does not require Local support..</p>	<p>Remove criteria a)</p>

Policy 5, Criteria b)	<p>Whilst we support a local connection criteria for the purposes of rural exception sites, the wording used in the actual criteria needs more clarification for the purposes of allocation. For example how is 'close family' defined? What is meant by other residents- does this include those not in housing need? What is defined as work- does this include voluntary work of say 2 hours per week or is paid employment? it also needs to be clear in the policy that allocations will be made to those in housing need and with a local connection to the parish not just based on local connection.</p> <p>(It is noted that by requiring a connection with Swanton Morley in perpetuity this effectively negates the lower orders of the cascade in Policy 4. This will have the effect of making it impossible to obtain lending on properties built under DC5).</p>	Clarity	Address our comments by justifying approach taken in the supporting text. Amend criteria b) by using criteria in Policy 4 a) – h)(which we propose deleting), subject to our comments.
Criteria b)	<p>It is also unclear whether this is to apply the whole of the cascade in Policy 4 to rural exception sites or just criteria a) to e) which relate specifically to Swanton Morley. If it is the latter, this could prevent rural exception sites from being developed as Housing Associations would not be able to be able to obtain lending against these properties.</p>	Clarity	Clarify whether the whole cascade is to be used rather than just criteria a)-e).
p47, para 6.90	<p>As previously advised aside from the fact that this paragraph contains an opinion, without any supporting evidence, such text is not appropriate for a statutory planning</p>	Opinion	Delete from "... <i>There are examples....</i> "

	document.		
p47, para 6.91 - 93	As previously advised aside from the fact that this paragraph also contains an opinion, without any supporting evidence, such text is not appropriate for a statutory planning document.	Opinion	Delete all paragraphs.
p49, Policy 6 Delivery of Planning Obligations	As previously advised, the local planning authority, it is Breckland Council's responsibility to ensure appropriate obligations are secured to ensure the development is acceptable in planning terms. Breckland Council will only consider any Parish Councils co-signing where they (The Parish Council) will deliver the infrastructure, on a case by case basis, when appropriate. These obligations can also be secured to enable transfer of any land to the Parish Council; if they so wish, early discussions with them will take place to ensure they are given this option. In addition the cost and delay to the developer in involving the Parish Council in the legal formalities may not be justified and reasonable and the Council must act reasonable manner.	The parish council is not a local planning authority under the Town & Country Planning Act 1990 and cannot therefore enter into a legally binding planning obligation, without Breckland Council's agreement. Also there is no evidence, including Community Feedback, to support this approach.	As the policy has not been amended, as previously outlined, it should be removed as this decision should be at the discretion of Breckland Council.
p 50 para 6.103	As previously advised, 'Higher Level Stewardship' is not an accolade but an agreement for money to manage land for biodiversity, recreation or farming depending on the details of the agreement.	Accuracy.	Amend " <i>Mill Common; has gained the accolade of Higher Level Stewardship from is managed under a Higher Level Stewardship agreement with Natural England whereby...</i> ".
p50, para 6.105, 3 rd sentence	As previously advised, " <i>In accordance with national planning guidance...</i> " It should be made clear which guidance and paragraph is being referred to?	To aid clarity.	Add the relevant reference as amended elsewhere.

p51, Map 7	The key is very difficult to read.	Referencing	Increase font size.
p53, Map 8	As previously advised, the key is still missing.	Missing Consultation Statement amendment – referencing.	Add to map.
p54, Policy 7 Local Green Spaces	As previously advised, Breckland Council is content that Gray Drive and Thompson Close remain as open space and as such are included with the SWNP. However, the site on Middleton Avenue, this is currently under review re its allocation as open space. Therefore, we would not want this site shown as open space within the SWNP. To 'make up' the provision we would like to put forward 2 separate sites to be used in place of the site at Middleton Avenue.	All 3 of these sites are currently classed as open space in the Breckland local plan/policy map. These allocations have not been agreed with the landowner; Breckland Council.	The 2 proposed sites are an additional area on Gray Drive and the outer area of land at Thompson Close, shown edged red on the attached plan. If these sites were agreed as a replacement for the site at Middleton Avenue it would mean that all open space/local green space is consolidated within the central areas of the two housing estates where these sites are based and not at the outer edges.
Policy 7	The final sentence does not read well as a policy and needs developing.	To clarify the policy position.	Amend <i>development will not be permitted on an identified local green space unless it supports its function and purpose as a green space</i> .
p56, Policy 8 Protection of Open Space	As previously advised, the Local Development Plan does not allocate School Playing Fields as Open Space.	Clarity	Remove site 10. See comments re p101, Appendix 3.
Policy 8	As previously advised, this policy designates an additional number of areas of open space, including areas at Robertson Barracks (Sites 14, 15 & 16). Whilst the existing evidence base shows that there is a deficit in children's play provision, there is a slight surplus in outdoor sports facilities compared to the national standard. The areas of land at Robertson Barracks are not deemed appropriate for open space designation, as there is no public access to the site.	Paragraph 74 of the NPPF does not allow for the loss of open space unless it can be demonstrated that there is a surplus. The current evidence is showing a surplus for outdoor sports provision within Breckland. Whilst this does not prevent the sites being allocated it does impact upon their deliverability.	Review designations and evidence for allocation of sites in light of NPPF (para 74). Remove sites 14, 15 & 16.

	Furthermore the barracks is being disposed of as an MOD asset in 2031. Therefore a masterplan approach for the site in the future is considered to be a more appropriate approach.		
Policy 8	As previously advised, Policy 8 gives additional protection by not allowing for the loss of open space unless it can be demonstrated that the benefit to the local community outweighs the loss. This is contrary to paragraph 74 of the NPPF, which provides a criteria based approach for the loss of open spaced.	The basic conditions require neighbourhood plans to have appropriate regard to national policy. To ensure compliance with paragraph 74 of the NPPF.	Remove policy or amend to comply with above.
Policy 8	As previously advised, Comments made in relation to Policy 7 re Middleton Avenue, also apply here.	Consistency	Amendments made in relation to Policy 7 re Middleton Avenue, also apply here.
Policy 8	The policy wording ' <i>Benefit outweighing loss</i> ' does not provide a clear policy position	To clarify the policy position	Amend: ' <i>..will not be permitted unless . . . alternative provision of the same type and function can be provided in a similar location or it can be demonstrated that the land is no longer required</i> '
p58, Policy 9 Management of Open Space	As previously advised, Breckland Council's preferred option is that it transitions to the parish council or a management company; however this would be dependent on whether this is legally allowed in relation to any other agreements, i.e. section 106. Currently we are not adopting open space and the majority are or have been transferred to the local town/parish councils.	Reflecting current practise	Remove criteria b).
p59, para. 6.152	Reference is made to 'Grade 1'.	Accuracy	Amend to "Grade 1 listed building"

p61, Map 9	North rose is missing.	Referencing	Add to map.
p64, para 6.161	The change was to add "Section 11, paragraph 109' but it now states just 'paragraph 109'.	Different Consultation Statement amendment.	
p65, Policy 11	All new major, rather than minor, developments should contribute to Green Infrastructure.	To clarify the policy position, as this may have viability implications.	Amend: Where green infrastructure new development it. — <i>New major developments should contribute positively towards GI and...</i> '.
p68, Policy 12	Point 1 covers heritage and ecology and these should be dealt with separately. Heritage should be 'preserved and enhanced', not 'respected and protected'.	To clarify the policy position	Separate 1 into two separate points to cover heritage and ecology in light of the comments made.
Policy 12	Point 3 – does elderly accommodation need to be single storey – if so clarify in policy	To clarify the policy position	Add words 'single storey' after 'good quality' – if appropriate
Policy 12	Point 8 – Change wording as not clear	To clarify the policy position	Replace "change 'particular' to 'existing'.
Policy 12	Point 11 – Add wording to clarify that such development should be to the rear or private area of the development.	To clarify the policy position	Add 'rear/private' after 'sufficient' and before 'external amenity space'
Policy 12	Point 12 – What is the configuration and standard of the parish? Is this drawn out of consultation?	Difficult to implement and secure this as not clear what this is?	Additional detail required i.e. certain types of lighting or only lighting in certain locations. Include examples of what is required.
Policy 13	Reference to the provision of communal car parking areas is a concern for planning out crime reasons.	To clarify the policy position.	Suggest adding 'well surveyed' after accessible.
Policy 13	Conflict with other policies in development plan and NPPF which seek to reduce reliance on the motor-vehicle. Are 4 spaces needed for 4 bedroom dwellings?	Alignment with strategic policies.	Additional justification for amount of spaces. Possibly require new development to provide visitor spaces to also address concerns.
p69, Policy 13 Parking	As previously advised, this conflicts with the approach to encourage more	Exceeds current development plan requirement with insufficient	Needs further consideration and justification for the approach taken

	sustainable modes of travel by limiting parking provision.	justification.	having regard to evidence; policy guidance and best practice in design.
p72/3, Policy 14	Second paragraph has a word missing.	Typo	Add 'to' after 'measures'.
p77, 6. 216-217	In practice this is likely to be very restrictive and problematic.	Developers need some flexibility in design and layout. Whilst a drive for more small units is welcomed, the way this is done is too prescriptive.	Amend to give a broader brush limit on the different sizes.
p78, Policy 15 Housing mix	As previously advised, see above comments re para 6.216-217.	See above.	Needs to have a broader sweep to allow flexibility on sites. E.g. 1-bed at least 10% 2-bed at least 25% 4-bed and larger not more than 30%
Policy 15	As previously advised, the policy and reasoned justification does not appear to consider the viability implications of the development. The requirements in relation to the housing mix may have implications on the viability of sites coming forward within Swanton Morley which could prevent sustainable development.	The key principle of the NPPF is the presumption in favour of sustainable development and the achievement of sustainable development is one of the basic conditions of neighbourhood planning.	Review policy with regards to viability. Add at the end of the policy: <i>'Where a development cannot provide the housing mix based on viability, the applicant will be required to submit an open book viability assessment. In such cases the Council will commission an independent review of the viability assessment, for which the applicant will bear the cost.'</i>
Policy 15	As previously advised, need to allow for potential 100% affordable housing schemes or rural exception sites where a specific need is being met.	May not be appropriate on all types of scheme.	Paragraph to take account of a scheme being delivered by a housing association, or scheme to deliver a particular need.
Policy 15	National guidance only requires this on development of more than 10 dwellings not 10 or more.	See PPG Planning Obligations, para 31 <i>'contributions should not be sought from development of 10-units or less...'</i>	Change text to refer to development of <u>more than</u> 10 dwellings.
p82, Policy 17	It is not clear what does <i>"that fit within the surroundings"</i> mean?	Clarity	Remove this section.
p87, Policy 19 Traffic Impact	As previously advised, the policy requires traffic impact assessments for all new	The Local List requires <i>'Transport Assessments will be required</i>	Review evidence and justify or remove policy.

	residential or commercial development. This exceeds the requirements set out within Breckland's Local List. No reason/evidence is given for why it is necessary to require transport assessments at lower levels than within Brecklands Local List. This also has potential implications for viability.	<i>generally for larger developments, such as housing schemes for more than 50 dwellings, and other developments with more than 100 car parking spaces'.</i>	
p89, para 7.9.2.	In light of the comments made in relation to Policy 4, this should be deleted.	Breckland Council" are looking to agree an approach and work with the Parish Councils, who are interested in monitoring, to ensure a consistent approach.	Delete text from 'to receive a record of....'.
Section 8, Glossary, p92	Reference is only made to conservation areas.	Completeness	The glossary should be amended to echo NPPF wording to describe designated and non-designated heritage assets or reference this as a type of such category..
p92, Development Plan Documents	The change was to add capitals to ' <i>local development framework</i> ', but this has not occurred.	Different Consultation Statement amendment.	
Development Plan Documents	As previously advised, reference to the Proposals Map is still out of date.	Consistency with current practise	Amend to " <i>Policies Map</i> ".
Development Plan Documents	'Development Plan Documents' at the start of the description seems to be a new typo, as formatting not consistent with the rest of the glossary.	Typo	Delete initial reference to ' <i>Development Plan Documents</i> '
Page 93, Glossary	Reference is only made to listed buildings.	Completeness	The glossary should be amended to echo NPPF wording to describe designated and non-designated heritage assets.
p100, Table 8	As previously advised, see comments	Consistency	Amend as outlined in Policy 7.

	made in relation to Policy 7.		
p100, Table 8	As previously advised, comments made in relation to Policy 7 & 8 re Middleton Avenue, also apply here.	Consistency	Amendments made in relation to Policy 7 & 8 re Middleton Avenue, also apply here.
p101-4, Appendix 3	As previously advised, it is noted that sites 1; 4; 5; 6; 8; 9; 10;11 (part); 13; 14; 15; 16 are currently not allocated as open space in on the policies map. [See comments made in relation to Policy 8].	Consistency	Remove sites 10, 14, 15 & 16.
p105 -126, Appendix 4-7	These appendixes are more appropriately located in the Consultation Statement, not Neighbourhood Plan.		