

Stoke Fleming Neighbourhood Plan Health Check Report

25 April 2017

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Summary of Recommendations

- The Basic Conditions Statement (BCS) needs to clearly include the date of designation and detail the consultation process undertaken upfront within the document. (1.1)
- Recommend that a clear timeline is provided upfront in the BCS which includes reference to the legislation, designation and consultation dates. (1.3)
- The BCS must be amended to provide details of the Strategic Environmental Assessment (SEA) screening and any subsequent report. This is recommended due to the location of the Parish within the Area of Outstanding Natural Beauty (AONB) and as the Plan includes housing site allocations. Obviously, the outcome of the SEA screening may have repercussions on the housing allocations made in the Plan and if necessary they should be adjusted accordingly. The Planning Practice Guidance (PPG) strongly advises that SEA is undertaken prior to the Regulation 14 consultation and having not done so presents an element of uncertainty and risk. (1.8), (2.4) and (2.8)
- A Habitats Regulations Assessment (HRA) screening should be sought from South Hams District Council (SHDC) to rule out the requirement for a HRA. (1.9)
- Further justification is needed in the case of a number of policies as outlined in the detailed notes. (2.1)
- The Plan needs to make a clearer distinction between the appendices and the policies. (2.2)
- The genesis of the settlement/development boundary needs to be more clearly evidenced. (2.7)
- The Local Lettings Policy should be checked to ensure that there are no human rights implications. (2.5)
- The site selection process needs to be made clearer in relation to the allocations and is open to challenge. (2.8)
- Policies range from minimal to very detailed. Suggest that some of the minimal policies are too close to the wording of the National Planning Policy Framework (NPPF) to be useful. The detailed policies requiring certain works to be undertaken are unrealistic in places. (2.9)

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?	SHDC Website	Yes. The BCS refers to this but needs to clearly include the date of designation and detail the consultation process undertaken upfront within the document. The Neighbourhood Plan (NP) area covers the whole Parish and was approved by SHDC Executive Committee on 5th June 2014. ADD THIS
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?	N/A	Not applicable. Stoke Fleming has a Parish Council.
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?	Consultation Statement	Yes. Pre-submission consultation is outlined within the Consultation Statement (CS) in accordance with the legislation. Recommend that a clear timeline is provided upfront in the document which includes reference to the legislation, designation and consultation dates. IN BOTH THE CS AND THE MAIN PLAN, AS PART OF THE MAIN TEXT, NOT AS AN APPENDIX
1.4	Has there been a programme of community engagement proportionate to the scale and complexity of the plan?	Consultation Statement	Yes. The CS outlines the full consultation process is being undertaken that uses a range of methods suitable to the audience and scale of the proposals.
1.5	Are arrangements in place for an independent examiner to be appointed?	No evidence	There is no information provided on this. Would advise that the Steering Group (SG) and SHDC begin the process of identifying a suitable independent examiner as soon as possible. RAISED WITH JLP 4/5/17
1.6	Are discussions taking place with the electoral services team on holding	No evidence	There is no information provided on this. The SG should engage with SHDC to ascertain this information. RAISED WITH JLP 4/5/17

	the referendum?		
1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?	No evidence	There is no information provided on this. The SG should engage with SHDC to ascertain this information. RAISED WITH JLP 4/5/17
1.8	Has an SEA screening been carried out by the LPA?	Basic Conditions Statement NB: TEIGNBRIDGE PROVIDE A PROGRAMME FOR THEIR NP GROUPS	No. A screening is currently in progress. The BCS must be amended to provide details of the SEA screening and any subsequent report. This is recommended due to the location of the Parish within the AONB and as the Plan includes housing site allocations. The outcome of the SEA screening may have repercussions on the housing allocations made in the Plan and if necessary they should be adjusted accordingly. The PPG strongly advises that SEA is undertaken prior to the Regulation 14 consultation ¹ and having not done so presents an element of uncertainty and risk. FULL SEA NOW IN HAND
1.9	Has an HRA screening been carried out by the LPA?	No evidence	No. The surveys included do not identify any significant issues within the NP Boundary. An HRA screening should be sought from SHDC to rule out the requirement for a HRA. The Plan does not raise any immediate concerns with regard to HRA, however screening would rule out any issues with regard to proximity to the Lyme Bay to Torbay candidate Special Area of Conservation/Site of Special Scientific Interest. IN PROGRESS. JLP REMINDED 4/5/17. ALSO HAVE DEVON WILDLIFE TRUST REPORT – WHICH MUST GO INTO EVIDENCE BASE.

¹ PPG Paragraph: 033 Reference ID: 11-033-20150209.

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Part 2 – Content

	Criteria	Source	Response/Comments
2.1	Are policies appropriately justified with a clear rationale?		In some cases. Policies have some rationale and accompanying justification. Further justification is needed in the case of a number of policies as outlined in the detailed notes. The information is generally contained within the Plan but needs to be brought upfront or referenced clearly within the policy justification. INCLUDE MORE OF THE TEXT IN THE COLOURED POLICY BOXES
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?		The Plan needs to make a clearer distinction between the appendices and the policies. Suggest that some of the key information around open spaces, housing sites and local lettings that is currently in the appendices needs to be more clearly signposted as policy justification and/or brought into the main draft of the Plan. I have suggested these changes in the detailed comments below. AMEND ACCORDINGLY
2.3	Are there any obvious conflicts with the NPPF?		The relationship with the NPPF is discussed in detail in the BCS and generally the Plan is coherent in this respect.
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?		Yes. Suggest a more detailed discussion of the key elements of the Plan including housing site allocations in sustainable locations. CREATE SUMMARY TABLE COVERING ALL POLICIES, NOT JUST SITES. SEE P SANDOVER EXAMPLE
2.5	Are there any issues around	Basic Conditions Statement	Yes. An SEA Screening has not been completed. The Local Lettings

	compatibility with human rights or EU obligations?		Policy should be checked to ensure that there are no human rights implications (as discussed in the examination of the Lyn NP). RESEARCH LYN EXAMINATION
2.6	Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?	Basic Conditions Statement	Yes. This is clearly stated within the BCS and the nature of the policies and projects do not touch on matters of excluded development.
2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?		No. No indication of non-conformity from SHDC. The inclusion of certain highways and footpath projects within the Plan as policies may lead to some issues with regard to implementation of the housing sites identified. The wording of these policies should be altered and preferred projects included in the Plan either as a list of priorities for funding received or included as provisions of the housing allocations in a more effective way. Otherwise deliverability of the proposed improvements is questionable with policies in their current form and an assumption of delivery by SHDC should not be assumed. AMEND WORDING TO DEMONSTRATE DELIVERABILITY E.G. SCHOOL PATH AS A NATURAL PART OF RECTORY FIELD DEVELOPMENT AT NO EXTRA COST. MUST PROGRESS AGREEMENT IN PRINCIPLE WITH LANDOWNERS. The genesis of the settlement/development boundary would benefit from being more clearly evidenced. RAISE WITH JLP
2.8	Are there any obvious errors in the plan?		Yes. The site selection process (referred to in the Plan as that of SHDC) needs to be made clearer in relation to the allocations and is open to challenge. NT ATTENDING TO THIS The Consultation Statement refers to members of the public voting on preferred sites but it is essential that clear criteria for the site selection and inclusion is explicit throughout the suite of documents. AMEND TEXT

			<p>The requirement for an SEA screening is stated incorrectly in the BCS. Policies are included that just re-state the NPPF, these need re-framing to include some critical elements outlined in policy justifications to ensure that they are effective in the management of development. FULL SEA UNDERWAY. AMEND TEXT.</p>
2.9	<p>Are the plan's policies clear and unambiguous and do they reflect the community's aspirations?</p>		<p>In some cases. Policies range from minimal to very detailed. Suggest that some of the minimal policies are too close to the wording of the NPPF to be useful. The detailed policies requiring certain works to be undertaken are unrealistic in places and put requirements that should be detailed in Section 106 agreements for the housing site allocations. As separate policies, they would be ineffective in terms of delivery. DEMONSTRATE DELIVERABILITY. COST WORKS TO BIRDWALK</p> <p>Suggestions have been made for the re-wording of policies but a re-think of policy content is required in some cases. Consistency and clarity is required to ensure that the policies are Development Management focussed and not a 'wish list' of projects. Some further separating out of the Plan from the supporting information and aspirations from the critical policies is required. Policies need to be framed by an understanding of the delivery mechanisms that planning can use e.g. the housing allocation policies can include some detailed requirements to allow them to guide the characteristics of the development without becoming overly prescriptive. The lists of footpath and highway improvements in policies need to be rationalised and included either as provisions of housing allocation policies or as a list of priority projects instead of policies in their own right. Overall, community aspirations are at the heart of the Plan and the policies are reflective of the outcomes of the consultation process. The policies are ambiguous in places and the re-ordering of</p>

			the material to provide justification of key policies is required. INCLUDE AS POLICIES, NOT PROJECTS
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DETAILED FEEDBACK:

Overall

Paragraph numbers would greatly improve the accessibility/readability of the Plan. **AMEND**

Neighbourhood Plan Draft

Foreword:

Page 1

Suggest changing bullet point one to ‘protect the area from developments that are inappropriate in scale or location’ as this is a clearer aim. **CHANGE**

Para 5: ‘The Steering Group received more than 160 suggestions from residents to its initial round of consultation in May 2014’. **It would be useful to reference the local community including local businesses, interest groups etc in addition to residents in the Foreword to set the tone of the document.**

CHANGE

Page 2

Mission Statement – How does this relate to the Vision outlined in the Basic Conditions Statement? It would be useful to be clear on the link between the Mission Statement and the Vision and have consistency between the documents on this. **Would advise using the Vision here. THE VISION IN THE PLAN AND THE VISION IN THE BCS ARE IDENTICAL, BUT TO AVOID ANY CONFUSION DROP THE WORDS “MISSION STATEMENT” BUT LEAVE TEXT UNCHANGED.**

Page 3

Para 4: Suggest replacing first sentence with ‘The Plan aims to set the agenda for the future of the Parish, outlining the community’s wishes for the next 20 years’, to ensure a positive tone for the Plan. **CHANGE**

Para 6: Delete ‘makes proposals for the development and use of land’ and retain the remainder of the sentence. **CHANGE**

Page 4

The inclusion of a settlement or ‘development boundary’ needs to be clearly evidenced. **SEE 2.7 TO BE RAISED WITH JLP**

Page 5

Excellent overview.

Page 7

Suggest checking written style and length of Stoke Fleming Magazine section, including the use of exclamation marks. **ENTIRE SECTION ON LOCAL ORGANISATIONS TO BE TAKEN OUT AND PUT ON WEBSITE**

Page 9

The Planning Context: Strongly suggest removing the specific reference to the local plan documents in this way. Delete from 'which currently relies on...' the bullet points and paragraph beginning 'As previously mentioned'. **CHANGE**

Page 13

Para 1 references 'the site assessment system currently used by South Hams District Council'. This needs to be further explained and a clear account of the site selection process and how sites were identified and evaluated against the relevant criteria as suitable, available and deliverable within the timeframe of the Plan. **QUOTE SITE SUSTAINABILITY THRESHHOLD ASSESSMENT (STA) IN THE shdc SITE ALLOCATION DPD 2011.**

Paras 7 and 8 will need to be updated in the final version of the Plan and it would be useful to reference the key stages of consultation as outlined in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations'). **CHECK REGULATIONS**

Page 14

Para 6 Remove 'No more than 30 new homes will be built' as this sets a negative tone to the Plan. Suggest changing to 'Site allocations identified in the Neighbourhood Plan are for up to 30 dwellings over the plan period'. **CHANGE**

Para 7 Suggest changing first sentence to 'New open spaces will be created to enhance the Parish and provide for relaxation and recreation'. **CHANGE**

Para 8 References the Vision – this needs to be clearly stated upfront within the Plan. **???** **CHECK**

Page 15

The Vision: Suggest making the paragraph 2 sentences. **CHANGE**

Objectives: Delete 'be able to live'. **CHANGE**

Bullet 2: suggest replacing 'consisting of history, architecture, footpaths and other features' with 'historic and cultural buildings, archaeology, footpaths and local landscape features'. Change 'where desirable enhanced' to read 'enhanced where possible'. **CHANGE**

Bullet 4: Delete 'organic' as it is unclear what this means. Delete 'but without large developments that would substantially alter' and suggest replace with 'without substantially altering'. **CHANGE**

Bullet 6: Delete 'Parishioners of all ages have opportunities to expand and develop themselves. This includes'. Replace with 'Promote facilities...' **CHANGE**

Page 16

Compatibility: Suggest removing this para and replacing with 'Compatibility, with the NPPF and general conformity with the strategic elements of the Local Development Plan'. This ensures that the Plan is not tied to specific documents but will observe the provisions of the relevant development plan documents at the time of decision making. **CHANGE**

Policy H1

The Objectives have already been clearly set out on page 15, so I see no reason for them to be partially repeated here. It is a policy with the prefix H (Housing policies) so this is what it should be, perhaps called "Level of Housing Provision". It should set out the overall level of housing development proposed over the Plan period with the policy justification providing an updated and more detailed explanation for the chosen level of housing growth and how it relates to both the adopted and emerging Local Plans. **CHANGE WORDING TO SPECIFY "HOUSING AND DEVELOPMENT" OBJECTIVES**

Preservation of visual character, might be incorporated into Policy H7 Heritage, with the justification removed from pages 16-17 and placed beneath Policy H7. The justification could usefully point to any evidence that underpins the approach. **CONSIDER**

The accompanying text to Policy H1 makes no mention of Green and Open Spaces so this element of the policy needs removing as it is, in any event, dealt with in Policy E2 Green and Open Spaces, Sport and Recreation. **BUT THEY ARE INCLUDED IN H3**

Para 2 Suggest removing first sentence 'The draft etc..' and replacing with a reference to the evidence or needs assessment undertaken to support the Joint Local Plan and/or how the figure of 10 new homes was reached. **CONSIDER INCLUDING WORDING FROM JLP**

Policy H2

Evidence for the chosen level of 35% Affordable Housing Provision in new developments needs to reference the levels proposed in both the emerging and adopted Local Plans and clear justification needs to be provided for the level chosen. **CHECK**

The reference to the affordable lettings plan set out in the Appendix needs a more robust justification and explanation. **??? CONSIDER**

Policy H3

Change to: 'Development of up to 20 new homes which must incorporate new local green space for community use.'

The viability of site allocations and policies must be considered. I would advise re-phrasing the green space requirement as this may have an impact on the viability of any development coming forward on the site. There is no justification for the green space requirement in the supporting text. **ADD WORDING**

PPG Paragraph: 005 Reference ID: 41-005-20140306 says policies and proposals in a neighborhood plan should be deliverable. More evidence that this allocation is deliverable would be a useful addition, especially as there is a danger that there may be proponents of sites not preferred for development (see Policy H5 of the SFNP) who could mount such deliverability arguments against its inclusion and press for the inclusion of their own sites. **CONSIDER. WE NEED TO ADDRESS DELIVERABILITY ON H3, H4 AND RT4 (CAR PARK) SEA ASSESSORS HAVE CONFIRMED WE NEED TO SHOW WE HAVE CONSIDERED ALTERNATIVE SITES SO THE "OTHER SITES" SECTION IS HELPFUL.**

Policy H4

Would suggest listing requirements within the policy rather than referencing them in the supporting text for clarity. In my view the provisions of Policy RT2 should be stated as part of the housing allocation. This would provide a clear single policy outlining each site allocation and any requirements in one place within the Plan. **AMEND, BUT ALSO RETAIN RT2 AS IT IS THE CENTRAL PIVOT OF THE PLAN.**

Again, PPG Paragraph: 005 Reference ID: 41-005-20140306 is relevant here. **CHECK**

Policy H5

Suggest removal of this policy and inclusion of a section in the main Plan on site selection which outlines the discounted sites and the criteria and methods used for site selection to ensure that the NP is less vulnerable to challenge. It is not a land use policy. **CHANGE**

Policy H6

Suggest including the supporting text as the policy as H6 currently provides no control over design. Replace policy with supporting text. **CHANGE**

Policy H7

This policy does nothing as stated that the NPPF does not already do. Advise removing this policy as it only serves to re-state national policy. **CHANGE**

Policy H8

This policy is not specific enough as 'appropriate' is not clearly defined. Suggest changing the policy and splitting into two:

- 'Infill development will be supported where the scale and form of proposed developments would be in-keeping with the existing surrounding residential properties and would not result in a negative impact on residential amenity'.
- 'Self build development will be supported where proposals would be well related to the existing settlement in terms of location and would not result in a negative impact on residential amenity'. **CHANGE**

Policy H9

This policy is too vague – suggest using the supporting text to provide detail within the policy. There appears to be a confusion between energy efficiency, climate change and sustainable development within the policy and supporting text.

Suggest re-wording: ‘All new developments are required to demonstrate how design, construction and operation has sought to promote energy efficiency’. Retain points a-f within the supporting text as examples of this information, but do not state all as requirements. **CHANGE**

Policy RT1

This policy relates to ‘any development’. Is this required in every instance? **INSERT THE WORD “HOUSING”**

Policy RT2

We have concerns that this is an achievable and deliverable policy. This requirement can be included in the Plan on a list of priority projects or the works to the Bird Walk can be referenced directly within the housing allocation Policy H4. As it stands the way it is dealt with makes the status of the proposal unclear and it would not have any weight as a standalone policy. **SEE ACTION PLAN**

Policy RT3

Similarly, to RT2, if this is considered a requirement linked to a housing allocation then it should be stated in Policy H4. Again, I have concerns over the deliverability of these proposals. **SEE ACTION PLAN**

Policies RT4-7

These policies are transport projects that cannot be included as policies without any reference to delivery. Advise including them within a projects list or stating the requirement for those that are related to allocated sites within the housing allocations policies. **KEEP RETAIN THESE BUT RE-WORD**

Policy E1

This policy is very loose and does not provide a clear definition of the key terms e.g. ‘unsuitable’. This ambiguity means that the policy can’t be easily interpreted by decision makers and is therefore not implementable. The protection of views referred to within the policy is also difficult to afford weight to, due to the subjective nature of the quality of certain views. Suggest re-wording the policy to clearly state what is to be preserved/protected/enhanced and unless ‘unsuitable’ can be clearly defined within the policy, this reference should be removed. **REMOVE “UNSUITABLE”**

The views that are shown on Map 4 and listed in the accompanying text to the policy could be made more explicit by the inclusion of some form of notation that ties the list of views directly beneath the policy to the map on page 4. **I.E.EXPAND AND LINK TO MAP**

As to the views themselves, the Plan does not provide any links to the evidence that supports the significance of these views. Given the setting of Stoke Fleming within the AONB, it would strengthen the policy and show its conformity with the AONB Management Plan if reference was made to Policies Lan/P5, Lan/P6 and Lan/P7 of the Management Plan to justify those views that warrant protection. **PROVIDE LINK(S) AND CHECK AONB MANAGEMENT PLAN**

Policy E2

If Local Green Spaces are being designated then this needs to be clearly stated in the main text of the Plan. Advise bringing the content relating to green spaces into the main Plan and also providing a clear account of the selection process in line with the provisions set out in Paragraphs 76 to 78 of the NPPF on local green space designation. **CHANGE**

See the NPs for Broughton Astley, Ascot, Sunningdale and Sunninghill for examples of Local Green Space Policies that have been through examination. **CHECK**

Policy E3

This policy does not set its terms clearly. Suggest stating this information in the text of the Plan and removing the policy or re-word to 'New developments should have regard to the SFW&BS 2017'. **CHANGE**

Policy E4

If a limit is stated within the supporting text this should also be included within the policy if it is expected to set the level at which schemes will be supported e.g. up to 50kW. **CHANGE**

Policy B1

Suggest moving some of the supporting text into the policy as it does not control the size/amount of conversion supported as it stands. It would also give more substantial weight to the policy to define what is considered to be 'small scale' in the supporting text. I suggest something along the lines of, 'Conversion of redundant agricultural buildings for small scale employment use is supported in principle'. **AMEND**

Community Projects:

It is good that the community projects are clearly separated from the policies in a separate section of the Plan. It may also be useful to mark this change with an explanatory paragraph under the title that outlines the status of the community projects within the document, for clarity. **ADD**

The first paragraph on page 25 recognises that these are not land use policies but despite this they are presented in the same way as policies in the preceding sections. Either they should be presented in a different way or the introductory sentence should make their exact status clear. **CHANGE COLOUR OF BOXES**

CP1 and CP2

It would be useful to provide a brief explanation of what a 'virtual' is within the text e.g. a continuous white line with the tarmac coated/coloured on the 'pavement' side (or something similar). It is my understanding that these have no legal or statutory weight, but are advisory at this time so these initiatives are correctly placed under 'community projects'. **PROVIDE EXPLANATION**

Action Plan:

I would advise that the key elements of the action plan that relate to policies for housing allocations (H3 and H4) and Local Green Spaces (E2) should be included in the policy justification in the main part of the Plan. **INCLUDE IN POLICIES**

Policy H3

Delete 'in other words it should not be designed as a cul-de-sac. A development on this site is likely to form the last piece of development along school road', as this is too restrictive. Suggest, instead, moving the text into the justification of the Plan policy. **ALTER**

Policy H4

Delete paragraph 1 and provide additional justification. **AMEND**

Monitoring and review:

Para 1: Delete 'as defined in the emerging Plymouth and South West Devon Joint Local Plan'. **DELETE**

Para 4: Delete as this does not follow the correct process for the review of a Neighbourhood Plan. **DELETE**

Appendix A:

This Local Lettings policy appears to be sound. It has been prepared in partnership with SHDC, audited through a 360 assessment and there is no evidence to suggest this will be problematic if included. Local Lettings Policies have been subject to scrutiny with regards to the Human Rights Act 1998 and, as such, this policy should be considered in the light of these requirements and a paragraph added on compliance in the BCS and Appendix A. **CLEAR WITH JLP AND ALSO INCLUDE IN BCS**

Appendix B:

The consideration of other sites is useful and gives some more information to back up the allocations. As previously stated, the site selection process needs to be clarified. Advise adding a paragraph or bullet points for each site stating why they are not: suitable, available and deliverable within the Plan period. This Appendix should then be referenced within the Plan when a discussion of the site selection process has been inserted. **AMEND**

Appendix C:

Delete as referencing the policy is sufficient. Also, when the NPPF is reviewed, this could become out of date. **DELETE**

Appendix D:

The NP offers the opportunity to designate local green spaces which afford areas further protection. Suggest that the provisions of the NPPF paras 76 to 78 are considered. **CONSIDER**

Appendix E:

This is useful community information but it should be considered whether this is better included on the website where it can be easily updated rather than in a plan of this timeframe which will require updating. **YES. DELETE**

Appendix F:

It is very useful to have the evidence base outlined in this way. However, the list should be reviewed and superseded documents such as PPS9 should be removed. **CHECK THAT ALL REFERENCES ARE TO CURRENT DOCUMENTS**

Appendix G:

This is a very useful matrix and provides clarity to the site selection process. This should be referenced more clearly within the Plan in the section that discusses site allocations. Are all the sites (including other sites) outlined within the table? This table is most useful if it provides an assessment of the allocated sites and 'other' discounted sites, like for like. More attention needs to be drawn to this selection process and how the consultation with the local community has fed into site selection in the main body of the Plan and CS. **DISCUSS**

Basic Conditions Statement

Section 1 Introduction:

Para 1: suggest change 'in accordance with the provisions of the Localism Act 2011 relative to neighbourhood planning' to reference the 2012 Regulations. **CHANGE**

Para 2: suggest change to 'The Neighbourhood Plan Area was designated on 5th June 2014 and the boundary of the Neighbourhood Plan Area is the same as the Stoke Fleming Parish'. **CHANGE**

Para 3: I suggest the following, 'six-week consultation period conducted by JLP - from x to x publicise the application for designation of the Neighbourhood Area', to confirm the dates. **ADD DATES**

The Plan: The plan is quite blurry – might the original designated plan be used as available here:

<http://old.southhams.gov.uk/CHttpHandler.ashx?id=8753&p=0>

Para 4: Suggest change 'within' to 'which comprises the entirety of' Stoke Fleming Parish. **CHANGE**

Section 2 Content:

Combine and ensure a working hyperlink is inserted. Alternatively consider just referencing the document as links to external websites can change.

CONSIDER

Section 3 Vision:

A well-conceived Vision. Would suggest splitting into sentences for clarity. **ALTER**

Section 4:

Para 1 After Qualifying Area include the date, 'on 5th June 2014'. **AMEND**

Para 3 I would advise just setting a timeframe for review of 5 or 10 years as complications can arise from an ad-hoc programme of review. This would likely be questioned by an Examiner e.g. keep 'will be reviewed every 5 years' and delete 'or as the Parish Council see fit'. **AMEND**

Para 8 suggest change 'various stakeholders' to 'local stakeholders'. **CHANGE**

Section 5:

Basic Conditions:

5(i) It is advised that an SEA is likely to be required due to the position of the Neighbourhood Area within the AONB. As previously noted PPG advises that this should be done prior to Regulation 14, albeit the 2012 Regulations introduce the requirement at Regulation 15. As such a screening opinion should be provided by SHDC to assess the Plan against the SEA Regulations and this should be undertaken expediently given the stage the Plan has now reached.

Delete para 1 and replace with the outcome of the screening and remove 'This is because' from para 3. **CHANGE**

Section 6:

Further detail needs to be added to para 5 'The Stoke Fleming Neighbourhood Plan has focussed on achieving sustainable development within the Plan Area'. For example, 'through the application of the Plan's vision, as outlined in para x above, and through the allocation of sites for sustainable developments within the Neighbourhood Area'. **CHANGE**

Section 7:

Para 2: suggest changing 'and changes made as described in the Consultation Statement' to 'and feedback has been incorporated into the draft Plan, including appropriate changes made to reflect the input of the local community, as described in the Consultation Statement'. **CHANGE**

Section 8:

I suggest that there should be a date included for the 'Stoke Fleming Village Conservation Area Character Appraisals (xxxx)'. **SHDC WEBSITE, ALSO EVIDENCE BASE P 42**

Under Biodiversity – if links are to be included within the document then these will need to be live (i.e so they can be clicked on). I would advise that as a rule referencing documents is better as the webpages may change – particularly in the lifespan of an NP. If links are included it may be useful to include them as a separate appendix which can be updated periodically. Suggest removing hyperlinks. **REVIEW**

8 (vii) Reference NPPF Flooding paragraph. **AMEND**

Reference to 'Policy E4' should be changed. **CHANGE TO E4 (P11 COL 2)**

Consultation Statement

Section 3: Consultation Process

I would advise that Appendix 3 should be signposted here as it brings all the information together in an easy to access diagram. This Appendix should then include dates for the start/end of each consultation period and clearly when decisions and amendments were made in the light of comments received. **OK**

The content in the statement is well put together and a useful compendium and summary of the events and work undertaken.

There should be some consideration of consultation methods used and why these were considered most appropriate for the audiences that the NP needed to engage e.g. local residents, local businesses/farmers etc. **CONSIDER AND AMEND**

More detail should be included about the consultation on site selection and how this process was undertaken. The site selection should demonstrate how it is based on suitability, availability and deliverability. A robust consultation process around the selection of sites, particularly those for housing or employment allocations should be demonstrated clearly in the CS to ensure that this element of the Plan is not challenged from a consultation perspective.

IN HAND WITH NT

It would be useful to have an overall conclusion section which states that the information provided is considered to comply with the 2012 Regulations. **PS SUGGESTS CHECKING GUIDANCE NOTES ON HOW TO WRITE A CONCLUSION**