

The Newport Pagnell Neighbourhood Plan

Report of Examination

Report to Milton Keynes Council

by the Independent Examiner:

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9 February 2016

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Summary

1. From my examination of the submitted Newport Pagnell Neighbourhood Plan and its supporting documents, including all the representations made, I have concluded that making of the plan will, subject to the modifications I am recommending, meet the Basic Conditions. In summary they are that it must:
 - Have regard to national policies and advice;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan; and
 - Not breach, and be otherwise compatible with, European Union and European Convention on Human Rights obligations.
2. I have also concluded that:
 - The plan has been prepared and submitted for examination by a qualifying body - the Newport Pagnell Town Council;
 - The plan has been prepared for an area properly designated; and does not cover more than one neighbourhood plan area;
 - The plan does not relate to “excluded development”;
 - The plan specifies the period to which it has effect – to 2031; and
 - The policies would, once some are modified, relate to the development and use of land for a designated neighbourhood area.
3. I recommend that the plan should proceed to a Referendum. This is on the basis that I have concluded that making the plan will meet the Basic Conditions, once modified, and all legal requirements.
4. If the plan goes forward to Referendum, I recommend that the Referendum Area should be the same as the Neighbourhood Plan area.
5. I commend this plan for the positive way it plans for housing growth and sustainable development and I congratulate the Town Council on the way they have prepared it.

1. Introduction

- 1.1 I am appointed by Milton Keynes Council (the Council), with the support of the Newport Pagnell Town Council (the Town Council), who is the Qualifying Body, to undertake an independent examination of the Newport Pagnell Neighbourhood Plan, as submitted for examination.
- 1.2 I am a planning and development professional of 40 years standing and a member of NPIERS' Panel of Independent Examiners. I am independent of any local connections and have no conflicts of interests.

The Scope of the Examination

- 1.3 It is the role of the Independent Examiner to consider whether making a neighbourhood plan meets the "Basic Conditions." These are that the making of the Neighbourhood Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan (see Development Plan, below) for the area; and
 - not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 1.4 Regulations also require that the Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 1.5 In examining the Plan I am also required to establish whether:
- The Neighbourhood Plan has been prepared and submitted for examination by a qualifying body;
 - The Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the TCPA as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 (PCPA).
 - The Neighbourhood Plan meets the requirements of Section 38B of the PCPA (i.e. the Plan must specify the period to which it has effect, must not include provisions about development that is excluded development, and must not relate to more than one Neighbourhood Area); and
 - The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the PCPA.
- 1.6 Finally, as Independent Examiner, I must make one of the following recommendations:
- a) that the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
 - b) that the Plan, once modified to meet all relevant legal requirements, should

proceed to Referendum; or

- c) that the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

1.7 If recommending that the Plan should go forward to Referendum, I am also then required to consider whether or not the Referendum Area should extend beyond the Neighbourhood Area to which the Plan relates. I make my recommendation on the Referendum Area at the end of this Report.

The Examination process

1.8 I commenced initial preparation for the examination of the plan in December 2015 by reading the plan documents. The default position is that neighbourhood plan examinations are conducted by written representations. However, I considered it necessary to hold a public hearing on certain matters on which I required clarification by the parties in person or to hear oral evidence. This was on a focused range of issues around the deliverability of the main allocated housing sites.

1.9 A public hearing took place on the 28th January at the Green Park Community Centre, a commonly used meeting place within the neighbourhood plan area. I carried out unaccompanied site visits in advance, as well as at the close of the hearing.

1.10 Before, during and following the hearing the Council and Town Council continued to review some of the policy drafting of the plan and with the principal representors. The Town Council produced two sets of responses: A letter on 14th December 2015, in response to the 9 representations; and later, a set of suggested modifications, in the form of a schedule of changes to the plan (which were then publicised on their respective websites), were submitted to me in early February to consider. I found these suggestions to me very helpful and I will be referring to them as the **Schedule of Changes** later in my report.

The Examination documents

1.11 In addition to the legal and national policy framework and guidance (principally The Town and Country Planning Acts, Localism Act, Neighbourhood Plans Regulations, the National Planning Policy Framework and the Planning Policy Guidance) together with the development plan (see section 3), the relevant documents that were furnished to me, and were identified on the Town Council's and Council's websites as the neighbourhood plan and its supporting documentation for examination, were:

- Newport Pagnell Neighbourhood Plan with appendices – Submission version
- Basic Conditions Statement;
- Consultation Statement and appendices; and
- Sustainability Appraisal.

1.12 In addition, I was furnished with some background documents, including the original Settlement Boundary, defined in the 2005 Local Plan.

The Qualifying Body and the Designated Area

1.13 Newport Pagnell Town Council is the Qualifying Body for the geographical area that

is the neighbourhood plan area. The Council designated the Neighbourhood Area in October 2013. There is no other neighbourhood plan for this area.

The Neighbourhood Plan Area

- 1.14 The town of Newport Pagnell nestles in a roughly triangular shape between the M1 and the A509/A422. It is a historic market town, which became closely linked to the Milton Keynes New Town in the post-war period. In the 1960s three new housing estates were added tripling the population to over 15,000 at the 2011 census. Changes over the 2001-2011 Census period also identified an ageing population, a growing number of infants but a declining school-age population. Ethnically, the town has a much higher British White population (91%) compared to the Milton Keynes average (74%). There were no significant changes in the socio-economic indicators over this period.
- 1.15 The town centre is regarded as vibrant with very low vacancies. The main industrial park (Interchange) also has low vacancy rate, while an older site – North Crawley Road Industrial Estate – has been vacant for over three years and is being demolished. The main employers include Aston Martin, the Co-operative and chain stores. The indicators and feedback from the Council suggested that there was no need to plan for more employment space.
- 1.16 There is one secondary school, at Ousedale, and four primary schools. There are also two medical facilities, six places of worship, a town library and three community centres. The Brooklands Centre is along-standing self-funding organisation run by volunteers.
- 1.17 Two rivers run through the town and there are extensive areas given over to playing fields, parks and other green spaces.

2. Neighbourhood Plan preparation and public consultation

- 2.1 The Neighbourhood Plan grew out of the requirements of the Milton Keynes Core Strategy to provide for more homes. The residual target of 613 homes was, however, judged to be insufficient to justify a complete new primary school and other supporting social infrastructure so the Town Council looked to expand a Strategic Reserve Site to accommodate roughly double the target. This is positive planning indeed.
- 2.2 Originally, the Town Council had decided to work with the Council to guide development through a discreet chapter in the new plan – Plan:MK. However, they later reversed that – in June 2013 - in order to prepare a plan themselves as they realised the options were too numerous for a single chapter. Prior to this the Town Council had already been engaged on setting a vision for the town and had agreed on five “pillars”. The neighbourhood plan’s preparation got going in January 2013 through a Steering Group establishing a programme of work, focused on 15 character zones.
- 2.3 The primary means of establishing local aspirations was through local events, specific consultations (as with landowners) and questionnaires. Regulation 14 consultations involved other parties such as statutory and non-statutory consultees, local businesses, groups and local societies. This involved standard letters, flyers and information on the parish website. [check]

- 2.4 A public consultation event on issues surrounding development in the parish was not held until December 2013. This was an open format event. A principal outcome was support for housing on the Strategic reserve Site known as Tickford Fields Farm; while another potential site, Portfield Farm was felt to be “deeply unsuitable.” Two issues that were repeatedly raised were the impact of the scale of new housing on school provision and medical facilities.
- 2.5 As the consultation process proceeded, these issues came to determine the scale and shape of future housing provision in the plan.

Environmental Assessment and EU Directives

- 2.6 Under Article 3(3) and 3(4) of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC SEA is required of plans and programmes which “determine the use of small areas at a local level”. The Council is the “responsible authority” and must determine whether the plan is likely to have significant environmental effects. They determined that the plan would not have such effects.

European Sites and the Habitats Directive

- 2.7 From the context and submitted material, I have concluded that the plan would not be likely to have a significant effect on a European Site.

Examination version – public consultation

- 2.8 The Draft Plan was submitted to the Council in July 2015. The Council subsequently published the Draft Plan, under Reg 16, with all supporting documents, for a 6-week period of public consultation, which closed on 18th November 2015.
- 2.9 A total of 9 representations were made. A number of the representations raised issues that I considered required clarification or oral evidence. I decided to hold a public hearing on selected topics, which formed the agenda for the session and ranged around the obligations on the main housing allocations.

Human Rights

- 2.10 I have no reason to believe that making the plan breaches or is incompatible with the European Convention on Human Rights.

Plan period

- 2.11 The neighbourhood development plan states clearly on the cover and in section 7.1 that the plan covers the period to 2031, which is beyond the adopted Core Strategy, which runs to 2026.

3. The Neighbourhood Plan in its planning and local context

National policies and advice

- 3.1 The neighbourhood plan must have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development (the first two basic Conditions). Paragraph 16 of the National Planning Policy Framework (the Framework) is concerned with neighbourhood planning: “The application of the presumption [in favour of

sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- *“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; [and]*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;”*

3.2 The plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, para 042 of the Guidance explains that:

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

3.3 Also, in relation to allocations, there has to be evidence to support the particular policy, notwithstanding it may express a strong and well-intentioned aspiration or concern of the local community; the relevant policy sections. Paragraph 040 of the Guidance includes:

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.”

3.4 The Statement of Basic Conditions sets out in section 1 how the Town Council considers that the plan meets the relevant Framework policies; and the national Planning Practice Guidance (the Guidance). In particular, it sets out in schedules how the plan meets the Framework and contributes to achieving sustainable development.

The Development Plan - strategic policies

3.5 The neighbourhood development plan must be in general conformity with the strategic policies of the development plan for the area. The development plan for the plan area comprises the saved policies of the Milton Keynes Local plan (adopted 2005) and the Core Strategy (adopted 2013).

3.6 The Statement of Basic Conditions sets out in section 2 what the Town Council considers to be the relevant strategic policies. A key strategic policy is CS1 and Table 5.1, which sets out the settlement hierarchy, in which Newport Pagnell is identified as a key settlement within the rural area. Table 5.2 sets a rural area housing target of 1760 homes to be built between 2010 and 2026, of which 1147 have been built or committed already, leaving a residual target of 613 homes.

3.7 The Basic Conditions Statement also refers to the emerging Plan:MK, which will replace the local plan and the emerging Site Allocations Plan but I have not had

regard to these emerging documents.

The Neighbourhood Plan and its objectives

- 3.8 The plan sets out (section 6) the vision of the Town Council (the five pillars) and how these have helped shape the plan. While the main policies of the plan are primarily directed at resolving the local community's contribution to the Core Strategy housing target, the document explains (6.2) that the aspirations of the community, as expressed in the preliminary consultation, were the third main influence.
- 3.9 The significant community concerns – see 2.6 earlier – focused on the need for provision of adequate schooling places and the difficulties in accessing medical appointments. Cycling and walking opportunities, green spaces and maintenance of the heritage aspects of the town were also important considerations.
- 3.10 The plan's central idea is to plan for a single major allocation that could contain within it a new primary school and medical facilities, which meant planning for a scale that could justify these on site. The Core Strategy target would not achieve this; hence a larger site on a larger scale was needed, which led to the allocation of the Tickford Fields development and expansion of the settlement boundary to accommodate it.
- 3.11 Helpfully, the plan explains at para 6.3 what it doesn't cover – conservation area, shopping and employment growth. What it does cover includes: the plan's context (chapters 1-5), the vision and objectives (6), the strategy (7), the policies (8) and monitoring (9). There are eight policies, the most significant dealing with housing allocations

4. The housing sites and Policy NP1

- 4.1 The plan allocates five sites at Policy NP1: Tickford Fields, which is identified as three, due to land ownerships; Tesco (former Aston Martin site); and two smaller sites in the town centre. Figures 10–12 identify their extent. The policy notes that the settlement boundary now accommodates an extended Tickford Fields site.
- 4.4 Together these sites are likely to accommodate some 1400 homes, well above the residual Core Strategy target of 631 homes. The representations on behalf of Heyford Homes – who were promoting a site outwith the settlement boundary - sought to cast doubt on the reliability of the CS target (especially in the context of a lack of a five year supply in Milton Keynes) and the deliverability of the Tickford Fields site. However, I found their arguments most unconvincing. I have no doubt that the revised settlement boundary contains more than sufficient land to accommodate the development plan's planned growth for the town and the Tickford Fields promoters convinced me on the deliverability of its constituent parts.
- 4.5 I also concluded that exceeding the CS target by such a margin would not, given the overall Milton Keynes target of over 28,000 homes, compromise meeting the strategic targets or undermining the strategic policies of the development plan. Indeed, this approach is highly consistent with the Framework's approach of exceeding targets where possible; it is indeed positive planning, and for a significant scale of sustainable development.
- 4.6 The policy also allocates two small brownfield sites in the town centre for housing development on which there were no representations.

5. Tickford Fields housing allocation and Policy NP2

- 5.1 The principal housing allocation is the subject of this site-specific policy. The objective for this site, which is made up of individual components, is to ensure it is comprehensively planned, and to contain some defined key elements and to be developed on certain principles, which are set out in a Development Brief (set out at Appendix 5 of the plan). There is already a resolution to grant permission for housing on the south-western corner of the site (Site A).
- 5.2 The principal representations on this allocation came from the main parties committed to development of the site: The Milton Keynes Development Partnership (with Milton Keynes Council, as landowner), and Welbeck Strategic Land. They supported the policy in general, did not raise any issues in relation to viability per se, but had concerns around the extent of some of the obligations that the policy imposed on the approach to, and content of, the development. All disliked the reference to an Estate here as a misleading description of high quality urban extension. I agree and **recommend** its deletion from the title of the policy, all supporting text and mapping.
- 5.3 The allocation had two elements that caused the representors particular concern: the requirement for the site to be “jointly developed” and the inclusion of a Development Brief. In relation to the former, at the hearing the Town Council explained that they agreed that the site could (indeed should) be comprehensively planned while acknowledging the ability of the parts to be developed separately. To do otherwise was not practical given the different ownerships.
- 5.4 To achieve this objective and meet the Basic Conditions, I **recommend** the deletion of the word “jointly” in the opening paragraph of the policy and that limb (a) to read: “The three sites comprising the Tickford Fields development shall be comprehensively master planned as a cohesive development, broadly in accordance with the principles outlined in the development brief attached to this plan at Appendix 5”. Also, in the paragraph at the top of page 24, the word “developed” (line 4) should be replaced by “planned”.
- 5.5 The parties promoting development would prefer the plan not to include a Development Brief as they were at such an early stage of the planning process; they were only just finalizing a Memorandum of Agreement on how to plan the site comprehensively and much technical work had yet to start. However, at the hearing the parties accepted that provided sufficient flexibility was built into both the policy – some of limbs (a) to (p) – and the Brief they had no serious objection to its inclusion.
- 5.6 The Town Council explained that: “The development brief produced is useful in clarifying the key principles needed to underpin in the longer term development of the wider housing site. It strikes a good balance between giving clarity and direction to landowners and developers, while allowing imagination, innovation and commercial input from eventual developers. It provides far greater detail than Policy NP2 of the Plan itself. This is entirely appropriate and the initial criterion of the policy provides the formal linkage between the two elements”.
- 5.7 I have come to the conclusion that as the site is such a significant part of the plan, that as the Development Brief is an integral part of it, and as it has been subject to extensive consultation, it should stay in the plan and on the terms it is stated to be: The Brief is not the policy while the appendix explains that it is for guidance and would be a material consideration. However, I agree that to ensure the deliverability

of this main allocation some flexibility is necessary, to meet the Basic Conditions.

- 5.8 At the hearing the promoters of development of the site focused on some key requirements of the policy and brief, where they sought greater flexibility. These concerned mainly the need for a comprehensive transport assessment, access, the location of the school and the nature of the medical facility. The Town Council and the parties had been engaged in dialogue on these for some time and the suggested Schedule of Changes (see my para 1.10) sent to me after the hearing was the result. In order to achieve the clarity of policy necessary and the deliverability of the allocation, to meet the Basic Conditions, I **recommend** that the Steering Group Proposed Text in the Schedule of Changes be adopted as modifications to the plan and brief, as I agree with their reasoning.

6. Tesco site allocation and Policy NP3

- 6.1 The neighbourhood plan allocates this former Aston Martin employment site for primarily housing, Tesco having confirmed that they would not proceed with the permitted store on the site. It is now being promoted for development by Redrow Homes. They support the allocation but seek some flexibility in relation to the obligations imposed by the policy, mainly in relation to three unlisted historical buildings located in the Conservation Area.
- 6.2 The Redrow concern is that they cannot provide fully restored historical buildings, as end users are unknown. There may be no uptake for D1 or B1 use and they would prefer 75% of developed housing as the trigger rather than 50% of housing completed as trigger to restoration of historical buildings. At the hearing the Town Council provided some clarification of what was expected as “restoration”. They also tabled an alternative to the approach to end uses, which offered greater flexibility and also to provide greater clarity and avoiding delay to delivery of this site.
- 6.3 I agree with the bulk of the Steering Group Proposed Text in the Schedule of Changes and support the proposed trigger, in the light of the wider flexibility. However, I am of the view that the approach to “restoration” is too confusing and unnecessarily specific given the wide range of potential uses. I therefore **recommend** that to meet the Basic Conditions limbs (a) and (b) of Policy NP3 be modified as follows:

(a) Development proposals for employment use, or a mixed used scheme comprising of a mix of residential or non-residential institutional use (D1) and business use (B1) will be permitted on this site. Employment or institutional use of the three historical buildings would be encouraged. Where it can be demonstrated there is no demand for either B1 or D1 uses, then residential conversion (C3) of the historical buildings would be permitted.

(b) The three historical buildings shall be retained and made ready for occupation prior to the occupation of 50% of any housing permitted on site.

7. Affordable Housing and Obligations and Policies NP5 and 7

- 7.1 The plan proposes a variation of the development policy on affordable housing (Policy NP5). The basis is reasonably well argued in the supporting text, earlier in the plan; and is supported by the Council, as reasonably consistent with a strategic policy in the development plan. Two main points raised against it were the need to recognise viability constraints and that the requirement for “social rented housing”

would be better described as “affordable” to meet the Basic Conditions. I agree and therefore **recommend** that to meet the Basic Conditions the words “subject to viability” be inserted in limb (a); and that the word “social” be replaced by “affordable” in limb (b) of Policy NP5.

- 7.2 The developer contributions policy (NP7) sets out the local community’s priorities for infrastructure provision – which will otherwise be enabled through development plan policy and supplementary guidance. The policy does, however, go further than the development plan. The supporting text explains this is in three areas: requiring additional land provision for playing fields, increased contributions to playing fields and a contribution to town centre enhancements. The reason is that given the scale of housing growth to be planned the new residents will need to be well integrated and to find and use the town’s facilities.
- 7.3 Given the scale of provision, I have concluded that there is a need to address the proportionate enhancement of the town’s facilities. However, this must be subject to the viability of the contributing development and so, to meet the Basic Conditions, I **recommend** that the words “subject to viability” be inserted into the introductory phrasing of Policy NP7.

8. Other polices

- 8.1 The plan’s other polices raise no real issues. Policy NP5 deals with Windfall Sites, which are likely to come forward within the settlement boundary. Policy NP6 concerns Cycle and Pedestrian Routes, which will be required as part of major developments (a) and, in the case of all other developments (limb b) the subject of a financial contribution.
- 8.2 Policy NP8 concerns Playing Fields and associated development. The key part of this policy is the allocation of land to the East of Willen Road (shown on Fig 15), designated as a linear park in the Local Plan, for recreational use. This is to enhance recreational and sporting facilities in the town, in the light of the planned scale of growth. There was one objection from the owners of part of the land who are unwilling to sell their land. Nevertheless, it is still capable of being delivered, no doubt by CPO if necessary, and Milton Keynes Council includes this project in their Local Investment Plan.
- 8.3 The Sustainable Transport Plan at Appendix 6 sets out a number of actions for the Town Council. These are described as Policies, which could be confusing as they are not land use polices. I **recommend** that they be renamed, such as Actions; and a suitable cross-reference should be inserted in the first paragraph at 7.4

9 Conclusions and recommendations

- 9.1 I conclude that the plan has been positively prepared, plans for sustainable development and exceeds the development plan target for new homes in the plan area. I congratulate the Town Council on taking such a bold and positive approach to their planning for housing growth and accommodating sustainable development.
- 9.2 Thus, this local community is doing what is at the heart of neighbourhood planning: The Framework (para 183-4) explains that neighbourhood planning gives local communities “... *direct power to develop a shared vision for their neighbourhood ... Neighbourhood planning provides a powerful set of tools for*

local people to ensure that they get the right types of development for their community”.

9.3 From my examination of the submitted Newport Pagnell Neighbourhood Plan and its supporting documents, including all the representations made, I have concluded that making of the plan meets the Basic Conditions, if modified in the way I have recommended. In summary, the Basic Conditions are that the making of the plan must:

- Have regard to national policies and advice;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan;
- Not breach, and be otherwise compatible with, European Union and the European Convention on Human Rights obligations.

9.4 I have also concluded that:

- The plan has been prepared and submitted for examination by a qualifying body - the Newport Pagnell Town Council;
- The plan has been prepared for an area properly designated; and does not cover more than one neighbourhood plan area;
- The plan does not relate to “excluded development”;
- The plan specifies the period to which it has effect – to 2031; and
- The policies relate to the development and use of land for a designated neighbourhood area.

9.5 I recommend that the plan, once modified, should proceed to a Referendum.

9.6 If the plan does proceed to Referendum then I recommend that the Referendum Area should be the same as the Neighbourhood Plan area.

9.7 Finally, I congratulate the Town Council and its volunteers for all the hard work that has clearly gone into the drafting of the plan. And I offer my thanks to both Town and Milton Keynes Council officers for their support in making the examination (and the hearing) so smooth.

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Independent Examiner

9 February 2016

Annexe

It is not my role to amend the style or presentation of such a well-prepared plan. However, it may help the authorities, as this plan moves forward to its next stages and as it comes to be used as a development plan document, to consider some improvements:

1. All paragraphs need to be numbered.
2. Some plan sections will not be necessary once made: the last para of 7.1 and Figs 6, 7 and 8, for example.
3. In Fig 4 the key should say Settlement Boundary, not Development, to be consistent with the policy. And Fig 5 has a rather grand title – it's just a site plan.
4. Fig 9 is difficult to read and is not actually part of the plan so could be dispensed with.
5. The land parcels in Fig 10 and Fig 1 of Appendix 5 are not the same. A note is necessary to explain why.
6. Fig 14 would benefit from the Conservation Area boundary being shown.
7. Some appendices may not be necessary once the plan is made: For example, 1, 2, 3, 4 and 7.