

## **Haversham-cum-Little Linford Neighbourhood Plan (Submission Plan dated July 2022)**

As you are aware I have been appointed to conduct the Examination of the Haversham-cum-Little Linford Neighbourhood Plan. In order that I may progress the Examination I would be grateful for the Qualifying Body's response to the initial enquiries below; the local authority may also have comments.

My purpose here is to better understand the intention behind the policy content from the authors and it is not to invite new content or policies that will not have been subjected to the public consultation process. In particular I need to be sure that the Plan meets the obligation to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (NPPF para 16). It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy.

My initial view, subject to the responses to this request and a brief site visit, is that the Examination can be concluded on the basis of written representations alone since the matters for consideration have been expressed clearly by all parties.

In order to ensure transparency with the conduct of the Examination, a copy of these queries is being sent to the Local Planning Authority with a request that the exchange of emails be published on the webpage relating to the Neighbourhood Plan alongside the representations received during the Regulation 16 public consultation. Where relevant, I have included below matters raised during that formal consultation.

The NPPF was last updated in 2021 and it is against that version of the NPPF that I must conduct my Examination.

### **Plan Content**

As noted above, It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. The NPPF (para 16f) says that Plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Representations request repetition of certain Local Plan content as affirmation that, in summary, "the Haversham Neighbourhood Plan does not prevent the ability for farmer / agricultural business to diversify their businesses outside of agriculture". My presumption is that, as stated in paragraph 5.2 of your Plan, the Qualifying Body is content to rely on existing national and local policies in regard to these matters; if that is the case then it may be helpful to have your confirmation.

### **Consultation Process**

I note that a representation, reflecting comments in some others, comments: "[At the Regulation 14 Consultation] Over twelve pages of residents' comments are included and these resulted in two changes to the draft Neighbourhood Plan. One of the two changes was also requested by Milton Keynes City Council. No feedback has been offered on the individual points we raised and overall It seems that the consultation exercise consists of requests for comments, consideration of the

comments, with little resulting change and, importantly, no feedback.” The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Plan [or Order].”  
(Reference ID: 41-047-20140306)

I invite the Qualifying Body to comment further on how they sought to keep the community informed, to be attentive to community issues and concerns, and thereby ensure an inclusive process.

### **Plan Period**

I note that the Plan period is shown as starting in 2016 but the Plan was submitted in 2022. I have not identified anything that might suggest that the Plan relies on data or other material that predates 2022. I would therefore have expected the Plan period to be 2022 – 2031. This point is different from one made in a representation which confuses the Plan validity period with the span of years addressed in the Plan. Your comments are invited.

### **Guide to Reading this Plan & Glossary**

This is a helpful introductory section, especially for those unfamiliar with reading Neighbourhood Plan documents. I note the “evidence base published alongside the plan on the Parish Council’s website”; however, it is important that documents essential to the application of Policies are included with or within the Plan itself. I will be considering this issue as I progress through the Plan document.

A representation objects to some of the definitions used in the Glossary. However, the objections appear to relate to the context within which the terms are used later in the Plan. It is appropriate for planning terms to be introduced for the benefit of a wide range of readers. I will address the objections in the representation, as appropriate to the particular plan context.

### **Foreword**

I would simply note that the Plan Examination is conducted by an Examiner rather than an “inspector”.

## **1. Introduction & Background**

I note that under the heading “Strategic Environmental Assessment & the Habitats Regulations” it is stated that MKC determined that a SEA was required but that a Habitat’s Regulation Assessment was not. I note that the MKC SEA Screening Report dated December 2021 concluded: “Historic England have advised that SEA is merited in this case for the limited reason of the plan’s potential for likely significant environmental effects for sites with potential for remains of archaeological interest which may comprise previously unidentified heritage assets. It is therefore the opinion of Milton Keynes Council that overall the Plan will have significant effects on the environment and that the Haversham-cum-Little Linford Neighbourhood Plan does need to be subject to Strategic Environmental Assessment.” A Scoping Report was then produced in February 2022 which

effectively establishes that the SEA should be limited to considering impacts on heritage assets – I presume that MKC supported this approach? The SEA itself is also dated February 2022 and is titled as “Draft”, authorship undisclosed. I note that there are no responses from the Statutory Consultees included within the document. Whilst these bodies were included within the Regulation 16 consultation, it would not appear they were directed to consider the content of the SEA and, of more concern, it would appear that Historic England has not responded to the consultation. If there is evidence that Historic England responded to the SEA document I should like to see it please, otherwise I would request that MKC chase Historic England for a response that includes reference to the SEA.

A representation comments: “Strategic Environment Assessment and the Habitats Assessment: What has been produced by the Haversham Neighbourhood Steering Group is not either of these. What appears to be have (*sic*) produced is a site analysis of each of the short listed site options. This was not independently reviewed. As such no reliance on this can be included within the plan relating to both the Strategic Environment Assessment and the Habitats Assessment. We would expect a qualified independent ecologist or environmental consultant to have carried out such a survey.” I invite the observations of MKC and the Qualifying Body on these comments, although I note that the reports themselves explain the approach adopted.

## **2. The Neighbourhood Area**

A representation challenges the accuracy of paragraph 2.2 where it refers to Wildlife Corridors – a source reference is needed and a check as to whether the text accurately reflects the MKC position. Similarly the accuracy of paragraph 2.4 is challenged where it is stated that “much of the southern and eastern part of the village flood” on the basis of a reference back to the Environment Agency Flood Maps; source referencing is again required. A challenge has also been made to paragraph 2.12 but I will be able to judge the reasonableness of that statement when I make my visit to the area.

It would be helpful if the boundary for the Neighbourhood Area was superimposed on Map C (and other similar maps) – I imagine that it is technical challenges that have been the issue here? However, an objection suggests that the maps reproduced are not entirely accurate or could be misleading. Whilst I appreciate that the maps are doubtless reproduced in good faith from published sources, I would appreciate comments from the Qualifying Body and/or local authority on the following matters:

Plan B: The representation suggests that the Plan is not “identical to the Linear Parks Plan under Policy DS6 within the Plan:MK 2016 – 2031 which is the current Milton Keynes Local Plan. The relevant Linear Park area is the Linford Lakes Linear Park.”

Plan C: The Plan is dated 2015 which, for the information being mapped, is not current. The representation suggests that the map should “follow the Flood Maps produced by the Environment Agency”. There is evident danger that reproducing maps which need to be updated frequently is likely to mislead unless a source reference is provided for where current maps will be found.

## **3. Planning Policy Context**

This is a helpful context section. It could be improved with some additional source references:

MKC First Homes Policy Position Statement March 2022

“In light of this MKC has issued a housing requirement figure of 1 to rural parishes”

“the Parish Council is mindful of the provisions of §14 of the NPPF in respect of securing protection for the parish”.

A representation challenges the accuracy of paragraph 3.5 where it is stated that “The plan [ambiguous as to which plan] requires no further housing site allocations to be made in Haversham to 2031”. The same representation challenges paragraph 3.8: “Although expansion to the north into the parish is likely to be very limited given the environmental and landscape sensitivities and constraints, green infrastructure and water management function”. In both instances, source references or actual quotes would help to assure clarity. A challenge to the accuracy of Plan D can readily be resolved because the linked content is easily accessible.

#### **4. Community Views on Planning**

No comments.

#### **5. Vision, Objectives and Land Use Policies**

I note that this section has not been altered.

##### **Land Use Policies**

##### **POLICY HLL1: SETTLEMENT BOUNDARIES**

A representation comments: “Policy HLL1 should be modified so that it allows for a degree of flexibility consistent with the requirements of the presumption in favour of sustainable development and allows for the consideration of sustainable development opportunities on sites adjoining the settlement where the benefits of the scheme significantly and demonstrably outweighed any harm, if these could assist with delivering the overall objectives of the HcLLNP.”

I can see that Plan:MK has already established the principle of defining Settlement Boundaries. My understanding is that the boundary for New Haversham repeats the boundary included in Plan:MK whereas the boundary for Old Haversham is new but follows the methodology adopted for Plan:MK. I query the former because, if there are differences in the New Haversham boundary, these need explanation.

##### **POLICY HLL2: HOUSING DEVELOPMENT**

The context for Policy HLL2 appears to be appropriately explained. However, a number of representations query a potential conflict of interests with the chosen consultants both evaluating the offered sites whilst representing the interest of the owners of the site ultimately chosen through their process. It is not clear that ‘representation’ is actually the case; I wonder whether the consultant had been requested to report authoritatively on the deliverability of the chosen site, which is one of the matters on which I would expect to see evidence. Further clarity is required.

Further clarity is also required I feel on the matter of site drainage and the information that the Qualifying Body has received that has convinced them that there is a feasible strategy. Also I note another representation queries: “a previous small planning application in the High Street was rejected due to lack of sustainability and so [I] do not understand how the proposed site can even be considered as it is further away with the one narrow pavement and a dangerous crossing”. Were previous planning decisions examined for indications of what might be required to achieve an acceptably ‘sustainable’ development?

Another representation comments: “Given the still early stage of the New City Plan and the current uncertainty regarding the wider planning strategy and the lack of evidence of local housing need, it is queried whether a major development of 16 dwellings represents an appropriately sized housing allocation for Old Haversham consistent with its current status in the Local Plan settlement hierarchy as a ‘village and rural settlement’”. This seems to echo the concerns of others making representations, about the possibly under-evaluated impact on a small, relatively isolated

community. One representation seems to suggest that the site is a more suitable candidate for Local Green Space designation than for housing use: “[the site is] the only green space in the Old Village free to access for villagers to meet and enjoy”.

The representation goes on to say: “In accordance with the community’s aspirations and the policy objectives, Site 5 would deliver a small housing development of up to 10 dwellings on a site under 1 hectares (*sic*) in size with a higher proportion of affordable housing (40%) compared to Site 11 which is proposing a larger site and a major development of 16 dwellings with a lower proportion of affordable housing. Development on Site 5 would also preserve the character of the village in the surrounding landscape, maintaining the linear nature of the High Street at Old Haversham and can preserve local biodiversity.” Whilst I appreciate that the site evaluations have been undertaken independently of the Qualifying Body, the independence of the chosen consultants has been questioned, and I would accordingly wish to know how convincing the Qualifying Body has found the site assessment report. Representations have also queried the quantum of affordable housing being delivered given the emphasis on such housing from the housing survey and the higher offers from other landowners.

A separate representation notes an alternative approach that, it is suggested, would be more viable: “the site that should have been explored much more intensely is the North end of the Recreation Ground. This site is already owned by the Parish Council, is on a bus route and would have a lower impact on its immediate environment in terms of additional traffic etc.”. A separate representation suggests that “there needs to be a reserve site, if the allocated site does not come through or produces less housing than expected”; was such an approach considered?

Your comments on the above issues are invited.

I and others have a few detailed queries on the Policy wording:

The allocated site is actually north of 27 High Street, Old Haversham, not south.

In element Bi it is suggested that the “developable area is 1 Ha” – the document “Design Proposals Site 11” does not suggest there are undevelopable areas, so it is unclear what distinction is being made here. It also remains unclear how the figure of 16 dwellings has been derived.

In elements Bii and iii what is “full regard” (*my emphasis*) intended to suggest? The local authority has pointed out that “For clarity, the policy should state that it is MKCC’s First Homes Policy Position Statement”.

The local authority has noted that Biv contains a typo – Policy HLL4 should be HLL5.

The local authority has suggested amendment to elements Bviii and ix to add ‘significant’ to “environmental harm” and replace “approved” with ‘for approval’.

In elements Bxi and xii where is it expected that “current standing advice” will be accessed (and how will its extent be known)?

Element Bxiv presumably refers to ‘vehicle’ electric charging points? And the local authority has suggested the addition of ‘relevant Supplementary Planning Documents’.

### **POLICY HLL3: FIRST HOMES EXCEPTION SITES**

The First Homes policy context is fully explained. I note that this Policy says “No other proposal for a First Homes Exception Site has been approved or implemented in the plan period”. I presume that the “other proposal” would be adjacent to New Haversham – or would it be within the Neighbourhood Area? What is the justification for this restriction – presumably the scheme should

be justified by need? The need for this constraint seems to arise because the opening sentence invites multiple schemes? I note that the site should be “no more than 0.4Ha” – precision unexplained - but I wonder whether that justifies the requirement that the site must have “a main road frontage”?

On a related point the local authority has commented: “Aii-iv - It is not clear how the maximum scheme size and site area has been arrived at. The key factors to consider are that development should be proportionate to the size of the settlement and should meet a demonstrable need” and “Aiii – greater clarity required as to what is meant by ‘main road frontage.’”

The Policy refers to “a Critical Drainage Catchment area” but this is not further explained or referenced in the supporting text?

#### **POLICY HLL4: ZERO CARBON BUILDINGS**

I note that this Policy starts with an expectation of “zero-carbon ready” but this term was not included in the Glossary at the beginning of the Plan, perhaps because there is no authoritative source? You will need to point me more explicitly to the piece of national Policy or Guidance that says that Neighbourhood Plans may impose their own energy performance standards – and without local evidence of viability – cutting across the requirements of the Building Regulations. An assertion that “Land values in the area are high relative to build costs and ought to be sufficient to ensure requirements to tackle improving energy and carbon performance are viable” is not evidence, it is just an assertion. In this regard a representation has commented: “The HcLLNP should however recognise the cost of such requirements which may have adverse implications on development viability. It should include a caveat whereby if it is not feasible or viable to meet the requirements, developments would need to meet alternative requirements so that proposals are not rendered unviable and undeliverable.”

Additionally, it would appear that Policy HLL4 requires additions to the National and Local List of Planning Application Requirements; it is not open to Neighbourhood Plans to do that; they must address land use matters.

I am aware of a document from the Centre for Sustainable Energy that has been circulating (Evidence and arguments for binding Energy Efficiency policies in neighbourhood plans) that says: “Whilst the building regulations are steadily strengthening regulatory requirements on development, they fall well short of requiring new development to be zero carbon, and many local plans lack such policies as well. As a result, many neighbourhood planning groups are keen to adopt binding energy efficiency policies in their plans, ideally requiring new development to be zero carbon.” However, speculation about the future direction of policy does not equate with guidance. The Government’s policy approach to the energy performance of buildings, ever since the 2015 Written Ministerial Statement and the Planning & Energy Act 2008, has consistently been that the required standards (and optional standards where applicable) will be set through the Building Regulations and not through the planning system. As the paper from the Centre for Sustainable Energy seems to acknowledge, there is already a pathway for the Building Regulations to become more demanding. Whilst there is nothing to stop Neighbourhood Plans encouraging higher standards – and Qualifying Bodies engaging with land interests to encourage their delivery – requirements are presently set at a national level through the Building Regulations. There is no expectation for Neighbourhood Plans to repeat what is already in the NPPF.

Your comments are invited.

## **POLICY HLL5: HIGH QUALITY DESIGN**

It is perhaps surprising that this Policy only references the “Neighbourhood Plan Character Appraisal” in the supporting text, not within the Policy; is the Appraisal merely to be regarded as supporting evidence for the Policy or as a document to be used by those designing schemes?

Whilst neighbourhood level attention to design matters is appropriate, the NPPF (para 128) says of design guidance: “Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.” Expectations that buildings will always be of 1 or 2 storeys and that extensions must ‘match’ and ‘conform’ with adjacent buildings may be considered over-prescriptive. A representation comments “It may not be possible to do former farm building conversions from the materials and design matching the existing building”, and indeed it may not be appropriate. Given the Plan’s support for energy-efficient design, the NPPF (para 134) lends support for “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.” A representation has urged: “Add to this guidance some thoughts how the wider requirements of the plan like views to the countryside and links to paths should be accommodated onto development sites - Make design quality guidance more Haversham specific and more robust.” Your comments on these lines of thought are invited.

The local authority has commented that “The statement ‘respect heritage assets’ in criterion Ai is too vague” and therefore some firming up is required for the Policy to be useable.

I note that the supporting text (para 5.25) says “The policy *requires* [my emphasis] the Design and Access Statements prepared for planning applications to demonstrate that, where relevant to the location of the proposal, regard has been paid to those principles”, but this is not explicitly so in the Policy. Is there a reason behind that inconsistency?

## **POLICY HLL6: NON-DESIGNATED HERITAGE ASSETS**

I note the proposed identification of Character Areas as non-designated heritage assets and I will be able better to judge the justification for this during my visit to the area. However, a representation comments at some length on the proposed identification of a Special Character Area at Old Haversham: “We consider that Policy HLL6 in its current form fails to comply with the various key paragraphs of the Framework and PPG. The basis of the policy and the designation in Old Haversham fails to meet basic conditions as required by the Act. The evidence needed to support a neighbourhood plan is clear in the guidance and 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. A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body.” It is suggested that the evidence doesn’t justify the blanket identification of an area with, it is suggested, allegedly precise boundaries as a non-designated heritage asset. Whilst it is possible that the representation overestimates the impact that Policy HLL6 may have, it is right to identify the need for “proportionate evidence” (Planning Practice Guidance Paragraph 40 (ID 41-040-20160211)) and for this to justify the proposal.

I note again that the “Environment and Design Report” that is intended to “demonstrate[s] why the areas are worthy of designation” is regarded as part of the evidence base – identifying boundaries for instance - rather than a document which would be expected to inform design decisions. Is that what is intended? It may be considered that the document falls short of what would be needed?

Although I note the Plan is provided for information, a representation challenges the accuracy of the map on page 32 (the representation identifies this as Map F but the document shows it as Map H): “The plan showing the extent of Archaeological Notification Sites does not match those produce by English Heritage. As such we are unsure where the evidence for this plan comes from. If you look at DEFRA’s Magic Maps and on English Natures Historical maps there are no known archaeological sites on the land owned by TM Paton and Sons. As such the plan should be redrawn.” The local authority is invited to consider and advise whether the map is an accurate representation of the “MKC interactive mapping” as identified.

#### **POLICY HLL7: LOCAL GREEN SPACES**

I will need to make a site visit to properly assess the identified spaces against the NPPF criteria. The appraisal of these spaces does not show evident regard for the factors included in the Planning Practice Guidance, but in these instances the evaluation appears sufficient.

I note the comment at the start of the evidence document “Report from the Environment and Design Task Group” that “the fourth [area identified as a potential Local Green Space] (Verge triangle on Wolverton Road) was removed after the pre-submission consultation (Policy HLL7). Milton Keynes Council had pointed out that it is too small to qualify under the ‘local green spaces’ criteria.” However, as there is no minimum size for a Local Green Space, I would suggest that the more pertinent issue was whether there was a “*particular significance*” as required by the NPPF criteria.

#### **POLICY HLL8: WALKING, CYCLING AND EQUESTRIAN ROUTES**

Element 1 of this Policy is a statement rather than a policy. Footpaths and bridleways are protected by other routes than Neighbourhood Plans and therefore, arguably, they should not be part of this Plan’s Policies Maps. However, I can see that their location is significant to the intent of elements 2 & 3 in the Policy. I note that the Policy Maps use “existing” in their keys.

Although ‘aspirations’ are essentially beyond the scope of the Examination, I note that a representation comments: “The short term aspirations put forward by the Neighbourhood Plan Steering regarding removing stiles and providing accessible gates on the Mill Road to Little Lane footpath goes through land which is grazed by our beef cattle, as such having accessible gates are not ideal as pedestrians using footpaths often leave the gates open ..... this is a footpath and not a bridlepath.” Further comments include “We have already made previous representations to state we do not support these new footpaths on our land” and “Please also note that horse riding is not permitted on a footpath, so the reference to horse riding should be deleted”. Plan content should not mislead.

#### **POLICY HLL9: GREEN AND BLUE INFRASTRUCTURE**

I doubt that it can be said that the Plan “designates” a Green and Blue Infrastructure Network. As the text says more realistically, it seems to locate “the presence of Green and Blue Infrastructure assets in the parish”. The related Policy Map says that the Network is “existing” (but the key to the New Haversham Inset Map seems to be somewhat confused). No methodology is provided for the identification and separation of significant open space, or already recognised spaces, from open space in general. A representation consequently comments: “whilst we agree that the integrity of the Network should be maintained and improved (as Part B sets out) we do not consider that it is appropriate to resist proposals that would result in the loss of land within the Network when there is no apparent basis for the identification of land to be included in the Network and the land in question may not contribute towards the Network’s integrity.” Another representation comments: “Certain developments are allowed within Plan MK Linear Parks relating to tourism and leisure. As HLL9 policy C should be amended to allow such developments, otherwise it conflicts with Plan MK”.



All this is not to say that it is inappropriate that the Plan “refines Plan:MK Policy NE4”, but the value of these spaces will be open to serious challenge without clarity as to how the spaces have been identified and a more appropriate evaluation.

Within the supporting text, but not the Policy itself, there is reference to “opportunity for a new wildlife corridor as an extension to the Wildlife Corridors already designated [unreferenced] along the railway line and the River Ouse valley”. The owner of Linford Wood indicates they have never been consulted about this proposal, but I note that it is one of a few initiatives beyond the scope of the Neighbourhood Plan. Once again, referencing should have provided essential clarity on the nature of the third party initiatives.

Your comments are invited.

#### **POLICY HLL10: IMPORTANT VIEWS**

I note in the supporting text it is said “The policy does not seek to prevent any development lying within a view but requires that proposals recognise and take account of these in their design” – but that does not actually accord with the wording of the Policy. Given that a significant number of factors will be taken in combination to assess any development proposal, it is not realistic to suggest that “Development proposals which would have a significant adverse impact on an Important View will not be permitted”. Potentially harmful impacts can often be mitigated by care with location, or design, and those are the types of factors that can make a new development acceptable, even though it is visible in the landscape.

I note that the evaluation of views is, in this instance, one of the submitted documents, presumably because this might allow a prospective developer to identify what is valued about any individual view? However, a representation is critical of the helpfulness/wording of several of the view evaluations: “the evidence base should be revised to remove views which include detracting features identified in the published character assessment; or where reliance is placed on the degraded condition of features which actually require maintenance and restoration, as also set out in the published character assessment” and “We recommend that the constituent elements of each view should be broken down to identify which are the key focal features and which are the subsidiary focal features. For example, in various views, there are features which are not representative of high-quality aspects of the landscape (as set out in the published character assessment) and which are clearly not as important for maintaining in the view as other elements. These features should be recognised as of lesser or no importance on the basis that any change in views of such features would be very unlikely to have a significant adverse impact.”

Your comments are invited.

#### **POLICY HLL11: LOCAL COMMUNITY USES AND PUBLIC HOUSES**

This Policy appropriately identifies local community buildings for the application of Plan:MK policies. However, as noted in the supporting text, not all use changes will require a planning consent and therefore the Policy wording needs to acknowledge that with (say) ‘where a planning consent is required’. The local authority has also noted: “The policy shouldn’t rely on criteria from policies in another Plan (i.e. Plan:MK). Clause B of the policy should set out relevant exceptions for when change of use of community facilities would be acceptable.”

#### **POLICY HLL12: MANAGING ROAD SAFETY**

Since traffic management measures normally don’t require a planning consent, these are difficult matters for a Neighbourhood Plan to influence. The local authority has also noted: “A development proposal cannot be required to go beyond mitigating its own harm and impacts.” The Policy will be

applicable in very limited circumstances. In my estimation, the two elements of this Policy say the same thing in two separate sets of words. Your comments are invited.

## **6. Implementation**

No comments.

### **Policies Maps and Insets**

The maps appear to have helpful keys readily relating back to the related Policy content but, as noted above, the key to the New Haversham Inset Map needs correction.