

## **Tilney All Saints Neighbourhood Plan (Submission Version)**

As you are aware, I have been appointed to conduct the Examination of the Tilney All Saints Neighbourhood Plan. I can see that considerable community effort has gone into developing the 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. The responses will all contribute to the progressing of the Examination.

I still have considerable work to undertake in fully assessing the submitted Plan but my purpose here is to better understand the authors' intentions behind some of the policy content. I note that some comments have been made within representations and I will aim to pick up below the most significant of these so that you may provide a response as appropriate. In order to ensure transparency with the conduct of the Examination a copy of these queries is being sent to the Local Planning Authority in order that the exchange of emails can be published on the webpage relating to the Neighbourhood Plan.

### **The Plan Period**

I note that the Neighbourhood Plan period is stated, helpfully prominently, on the front cover to be 2016 – 2036. Whilst I appreciate that the Plan preparation may have commenced as early as 2016, since the implementation of the Plan policies cannot be backdated, none of these depend on data dated 2016 and the Plan was not submitted until 2020 (indeed it cannot be implemented until 2021 at the earliest), a more appropriate Plan period would be 2020 – 2036. Do you have any comments on such an amendment?

### **Related Documents**

The representation from the Marine Management Organisation points out that that as the "landward extent [of their] Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers such as the River Great Ouse), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark." Therefore they note: "The Related Documents include the Norfolk Strategic Planning Document. The latest endorsed version references marine plans. We would also recommend you mention the [East Inshore and East Offshore Marine Plans](#) in this section." You may already have been aware of this Plan, but they recommend that you review some specific Policies in that Plan as having relevance to the Neighbourhood Area. (However, I would add that there would be no value in the Neighbourhood Plan merely duplicating policies.) They further offer you "a meeting covering general information on marine planning, monitoring and implementation of the east marine plans, tools for implementation and an update on the development of marine plans in England."

### **1. Introduction**

I agree with the local authority that this section "Provides a very useful appreciation of the area and how this has evolved over time". However, I have a couple of clarification points.

Within the opening sentence there is a reference to Appendix A where there is a map of the Parish at a helpfully readable scale. However, the requirement for a Neighbourhood Plan is that it should include a map of the 'Neighbourhood Area'. Whilst I appreciate that the Parish and the Neighbourhood Area share the same boundary, the text and the map need to make

it clear that it is the “Neighbourhood Area” that is being illustrated, and it would be helpful to show the date of designation alongside the map. Further, I believe that it would be better to leave the reference to the (corrected) map until that included in section 2.1. Do you have any comments on such amendments?

On page 7 it is said, in relation to the site allocated for development in the Core Strategy, that “The site is in Tidal Flood Zone 2 and would mean the loss of some good quality agricultural land”. I believe “Flood Zone 2” should, from the map included in the Plan, read ‘area at medium risk of flooding’ - the Government’s flood map for planning seems to designate the area as an “Area benefiting from flood defences”. However, I note that this designation applies to the whole Parish, not just the selected site. Similarly, the reference relating to the quality of agricultural land would apply anywhere in the Parish except that the site actually appears to be within a Grade 2 rather than Grade 1 area. Apart from being factually inaccurate, to note these features would seem somewhat unfair given that, as a small site of linear infill, it apparently has support from Policy 1.3 in the Neighbourhood Plan? Your comments are invited.

### **3. Vision and Objectives**

#### **3.1 Vision**

It is, in some parts, difficult to distinguish whether the statement is a factual one about present day Tilney All Saints or an ambition for the future. The Vision says “The village continues as...” and “Communications and connectivity have been...” whereas, if looking to the future, it may be more appropriate to say ‘The village will continue as’ and ‘Communications and connectivity will have been’? Your comments on the intention are invited.

### **4.0 Housing**

#### **4.1 Development**

I agree with the local authority that it can be appropriate for the Neighbourhood Plan to apply Local Plan concepts at the neighbourhood level. However, I have queries in relation to the justification for and wording of Policy 1.1:

- i. The Policy comes under the “Housing” section but, from the stated purpose, it would appear that development of all types would not be considered appropriate?
- ii. The area to be designated would appear to wholly overlap with the combination of several areas to be designated as Local Green Spaces – I will address that topic later – so it is difficult to see what purpose two separate designations might serve?
- iii. I find it difficult to distinguish separate expectations for elements (b) and (c) of the Policy – what distinction is being made?
- iv. As written the Policy would appear to accept, in certain circumstances, development which would not be appropriate within a designated Local Green Space, and as such there would be an internal conflict within the Plan?
- v. The boundary of the “Gap” would be better defined (map-wise) and understood if combined with the Development Boundaries (with their designation source provided) as shown in Appendix D?
- vi. Anglian Water has commented: “We welcome this amended wording which is consistent with our previous representations. But for clarity it is suggested that the

wording is amended as follows: 'a) it is consistent with policies for development in the countryside *including* essential infrastructure provided by utility companies;'

Your comments are invited.

## **4.2 Housing Mix & Type**

Whilst circumstances can change over the Plan period, it would appear that there is some internal conflict between Policy 1.3 – which suggests that individual developments should not exceed 5 dwellings to be acceptable – and Policy 1.2 – which says that it only applies to developments of 5 dwellings “or more”. Clearly Policy 1.2 may apply – subject to a coincidence of timescales – to the site allocated in the Core Strategy but, for that, 20% for housing the elderly would equate to one dwelling and the expectation of further “dwellings” (plural) with “two bedrooms or fewer” may make the combination unrealistic, and wouldn’t represent much of a mix. I am not sure that this level of detail is relevant or justified by the evidence. One possible reading of the level of detail in Policy 1.2 is that a larger development (more than 5) could be acceptable – and encouraged? - provided that the particular requirements set down are addressed. Was that part of the thinking behind the drafting of this Policy?

## **4.3 Design**

The preamble to and the content of Policy 1.3 makes clear the importance of the Character Appraisal which has been undertaken specifically for the Parish, though a source reference for it does not seem to be provided. To ensure that the Appraisal is readily available for use, it might helpfully be included as an Appendix to the Plan (as its purpose goes beyond that of the evidence base)?

In relation to the wording of Policy 1.3, whilst I can see that “5 dwellings” may be a fair, approximation of the scale of new development appropriate in a rural location, I am unconvinced that “New homes in excess of this number have the potential to become an insular community and discourage integration into the existing village structure”. Is there any evidence that would support this theory? Similarly, I am unsure that “linear” development is evidently compatible with the “village concept”, although I can see that linear development presently dominates in the Parish?

It seems to me that paragraphs 1 and 3 within the Policy duplicate the same basic ground; the format of paragraph 3 is to be preferred with its listed criteria but for clarity this listing ought to be comprehensive. The clarity of the criteria needs to be ensured and, in this respect, I am unsure what is being sought and what might justify the following:

a) “diversity in design for proposals of more than 3 dwellings”: how should “diversity” be interpreted (particularly in the context of the other design expectations) and why has “3 dwellings” been chosen as the threshold here?

d) “private gardens that can be accessed without going through the house”: what is the thinking behind this expectation, given in particular the difficulty that would be encountered with a terrace of properties (which would be an ideal format for 2 bed dwellings)?

f) “Site boundaries are soft”: does this suggest more than just planting?

“Innovative application of energy efficient materials will be supported”: is “materials” here intended to extend to features such as solar and photo-voltaic panels?

Your comments are invited.

#### **4.4. Light Pollution**

Whilst I can see that this is a very relevant policy in a rural location, Policy 1.4 as worded seems to be equivocal about when street lighting will be appropriate. Looking at the referenced (but not source referenced) County policy, I note that it says: “Only adopting new streetlights on developments if there is a defined Highway need”. Given the likelihood that new development will be along existing roads, the issue of new lighting may not be relevant in most instances, but consistency with the County Council policy is necessary. Further, I would query whether it would be possible for an applicant to provide evidence that could establish “demonstrable improvement for community safety”.

Your comments are invited.

#### **4.5 Affordable Housing**

The preamble here says: “Historically the Borough Council has kept an active list of persons seeking to live in the parish, at the time of writing the list contains 14 names (BCKLWN, Local Housing Profile Summer 2017). There are 22 affordable homes registered in Tilney All Saints, comprising 9% of the current housing stock. A review of the Housing Register (December 2018) indicates that demand for affordable housing in the parish outstrips supply. A third of applicants on this snapshot of the Register reside within Tilney All Saints. This indicates that there is a desire for people to remain within the community, but that a suitable property is unavailable or they are unable to afford current market prices, which are relatively high.” I don’t believe that it is possible to reach the conclusion made without some understanding of the frequency with which the 22 properties are being relet. Perhaps the December 2018 Review (not source referenced) addressed this point?

I note that Policy 1.5 stops short of identifying and allocating a rural housing exception site, which would have given more direct control over the location of a site. I am unsure what “reasonable sustainable access to village services” was intended to indicate for appropriate locations, given the distributed nature of those services. Might it be sufficient to say ‘well related to the Development Boundary of either Tilney All Saints or Tilney High End’? As it is an expectation of Exception Sites that the affordable properties be retained as such “in perpetuity”, the Policy should probably make this implicit assumption explicit.

Your comments are invited.

#### **5.0 Environment**

I note that with Policies 5.1 and 5.2 the presentation format has changed and the opening justification or preamble for the Policy has shifted to become an after-policy detailing of why the Policy is worded as it is. I think that approach is particularly problematic for Policy 2.2. Is there a reason for this change?

#### **5.1 Heritage Assets**

A number of queries arise from Policy 2.1:

- i) It is helpful that the Plan identifies and maps the location of the designated heritage assets in the Parish. The related cross-reference is however solely to Appendix C whereas the Scheduled Monument is shown in Appendix B; perhaps these Appendices could be combined without detriment?
- ii) The Appendix C list appears to be formatted to provide a direct link to the Historic England registry entries, but there is no active link? It would be helpful if the listing distinguished the listing grade eg the Church of All Saints is Grade 1.
- iii) The status of the non-designated heritage assets is unclear; it would appear that they have been first identified for the Neighbourhood Plan? Unlike the designated assets, no detail is provided (outside of the Character Appraisal) as to the significance of the identified asset and, in the absence of this, it will not be possible for applicants to fully assess the impact of their proposal. A brief description of the value/significance of the asset is required.
- iv) National policy within the NPPF specifically expects that heritage assets should be “conserved in a manner appropriate to their significance” (para 184). This wording must therefore be fully reflected in Policy 2.1.
- v) The local authority has commented that the expectation of a formal Heritage Statement for non-designated assets may be onerous. I believe that it would be sufficient for applicants to be required to state how they have identified and addressed impacts on the significance of the heritage asset and its setting.
- vi) The County Council has recommended inserting the following wording within section 5.1 Heritage Assets, ‘Developers with concerns about how their development may affect the historic environment should contact Norfolk County Council Environment Service historic environment strategy and advice team directly for pre-application advice to identify archaeological implications. The historic environment strategy and advice team will continue to examine all planning applications and make recommendations to the local planning authority on archaeological mitigation if required.’ I further believe that the element in the Policy referring to archaeology could be clearer as: ‘b) Archaeological remains (including areas with potential for finds).

Your comments are invited.

## **5.2 Flood Risk and Drainage**

As noted above, the justification for Policy 2.2 is not provided before the Policy itself. As also noted above, my interrogation of the Government’s flood map for planning showed the designation as an “Area benefiting from flood defences”. In the final sentence of the explanation that follows the Policy it is stated: “The Neighbourhood Plan seeks to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Plan area”. However, I am unsure what that “contribution”, beyond the noted constraints of other existing policies, might be. The Neighbourhood Plan does not itself propose or support development which might materially affect the current position or risks.

A land use Neighbourhood Plan cannot alter national administrative procedures for when a formal Flood Risk Assessment will be required. The NPPF says (footnote page 47):

“A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.”

Anglian Water has commented: “The majority of Tilney All Saints Parish is not connected to the public foul sewerage network. However, there are existing public sewers in the vicinity of Glebe Estate which drain to Tilney All Saints Glebe Estate Water Recycling Centre (formerly sewage treatment works). We would therefore ask that Policy 2.2 be amended as follows: All new development will have to provide an effective and sustainable private sewerage plan to be agreed with the Local Planning Authority in advance of development commencing. Such a plan must be implemented prior to the occupation of the first dwelling. Where practicable and viable foul flows should be drained to the public sewerage network.”

The representation from the County Council as the Lead Local Flood Authority (LLFA) welcomes the inclusion of Policy 2.2, noting that “According to Environment Agency datasets, there are areas of surface water ponding and surface water flowpaths present within the Parish of Tilney All Saints. We welcome that surface water maps are included for the main urban areas of the parish in Appendix G. We note these surface water flood maps do not represent the entire parish. The LLFA recommend inclusion of a separate surface water flooding map within the Neighbourhood Plan representative of the entire parish of Tilney All Saints.” However, there are evident difficulties in reproducing such maps at a readable scale within a Plan document and such a map could quickly become out of date, which may then mislead. As the representation has itself done, the appropriate approach would probably be to provide a source reference for the relevant map. The representation also provides the relevant links to the comprehensive LLFA Planning Guidance.

Part of the problem with Plans delving into detail is that, as the representation from the Kings Lynn Drainage Board illustrates, it is difficult to present a comprehensive and current picture with clarity. The representation comments “In order to avoid conflict between the planning process and the Board's regulatory regime and consenting process, we would like to make you aware of the following points that may be relevant to certain sites as part of their development:” and they then list 4 matters of detail. As the Neighbourhood Plan does not itself propose any development, raising awareness of these issues might be considered, at best, an information exercise.

The NPPF (para 16) says that Plans should avoid “unnecessary duplication of policies that apply to a particular area”. It may be that Policy 2.2 represents one such unnecessary duplication as nothing particular to Tilney All Saints is addressed. I note that residents “have concerns that flooding has been exacerbated by new homes being built or alterations to existing homes” but no evidence is provided to support this theory; the noted impacts of climate change may be a more likely explanation and those are being addressed through broader-scaled and higher-level policies.

It is reasonable, if wished, for the Plan text to point to the relevant LLFA (and Drainage Board) policies and guidance but perhaps more helpful, there might be a Community Policy

worded along the lines of 'The Parish Council will actively contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Parish'.

Your comments on the above lines of thought are invited.

### **5.3 Natural Environment & Landscape**

It would not appear correct to say that "The entire parish is classified according to Natural England as Grade 1 Agricultural Land". The map at Appendix H shows an area to the south-west as Grade 2?

The NPPF (para 170) confirms that plans and planning decisions should "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland" and (footnote on page 49) acknowledges that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". These assure a significant degree of protection for the character of the Parish.

In relation to the wording of Policy 3.1 I request an explanation of the following:

i) Phrases such as "The Neighbourhood Plan seeks to ..." are inappropriate since the Policy itself is a statement of what the Plan is actually requiring.

ii) The term "farming integrity" is not explained?

iii) The term "settlement limit" is not explained; does this relate to the Development Boundaries shown at Appendix D? I note that Core Strategy Policy CS01 commits to "protect the countryside beyond the villages for its intrinsic character and beauty, the diversity of its historic environment; landscapes; geodiversity and biodiversity through a Green Infrastructure Management Plan, and Biodiversity Action Plans".

iv) The local authority has questioned the justification, within element a), of a "3 year" threshold; to that I would add a note that a lack of use would not alter the classification of the land itself.

v) In relation to Policy element (b) it would seem that most development proposals are likely to relate to a plot "too small to be in viable agricultural use" but that "plot" may be or could become part of a larger field or viable smallholding?

vi) In relation to element c) there are other types of development within the countryside beyond agricultural workers' dwellings that may be acceptable within the NPPF.

Your comments on the above lines of thought are invited.

### **Policy 2.4: Natural Environment – Ecology**

The inclusion of the following seems not to be a statement of useable policy applicable to individual proposals but more a statement of belief: "Development overall should achieve a net gain in biodiversity such as through the creation of high-quality habitats, improved connectivity to other habitats, and the inclusion of design features that enable animals, especially species in decline, to move between habitats unhindered."

The phrase “Great weight will be given to proposals that would result in a significant ecological benefit” may be read to imply, inaccurately, that otherwise unacceptable proposals could be made acceptable by the inclusion of features of ecological benefit. In reality the weight attaching to different factors will vary with context.

Your comments are invited.

## **6.0 Community Assets and Local Green Space**

### **6.1 Community Assets**

Is the term “Community Assets” here being used differently from “Assets of Community Value” which are registered with the local authority?

#### **Policy 3.1: Tilney All Saints Primary School**

As noted above, phrases such as “The Neighbourhood Plan will support ...” are inappropriate since the Policy itself is a statement of what the Plan is actually requiring. As worded the Policy requires that “the development is sympathetically designed and appropriate to the needs of the school” if additional work space areas are being provided but not if it is “a permanent extra classroom”. I am not sure that such a distinction was intended? No supporting evidence is provided to suggest that there is sufficient flexibility within the school site to accommodate additional buildings and therefore give some assurance that this Policy would be deliverable.

#### **Policy 3.2: Village Hall**

I note that this Policy has support from the Borough level Community & Culture Policy CS13. However, as also noted above, no evidence is provided to suggest that there is sufficient flexibility within the Hall site to accommodate additional buildings and therefore give some assurance that this Policy would be deliverable.

### **6.2 Local Green Space**

This Policy appears to lack the level of supporting evidence for what it is said to be wanting to achieve. ‘Local Green Space’ designation gives a high level of protection but is designed for local spaces evidenced as being of “particular” significance. What I would expect to see is a tabulation (or similar) of Local Green Space designation evidence against all the specific NPPF criteria (NPPF paras 99 – 100) including (as per the Planning Guidance) consideration as to whether the designation will provide additional protection beyond what already exists and whether the designation can endure beyond the Plan period (the latter may involve consultation with the landowner where that is not the Parish Council); I would need to see such evidence before the Examination could conclude. If any sites do not match with the NPPF criteria then there would still be the possibility of designating the land as ‘Green Infrastructure’ (or similar) but this would not afford the same high degree of protection as the NPPF defined ‘Local Green Space’.

A particular question might arise in relation to the “Allotment Land” since the Parish Council already, through ownership, has the ability to protect the land and, in view of its present agricultural use, it may be questionable whether the land is of “particular” significance to the community. Further, I have already noted above the overlap with Policy 1.1.



I further note that the “Medieval Settlement” is already protected as a Scheduled Monument. Beyond this, does it also have a “particular” value to the local community?

### **Policy 3.3: Local Green Space**

The scope of the charging schedule for the Community Infrastructure Levy (CIL) is a matter for the Borough Council (following the required procedures). As is later noted the Parish Council will receive a specific proportion of the CIL monies arising from development within the Parish. As a Community Policy – as shown in section 6.3 - the Parish Council may indicate its priorities for spending those monies.

The second paragraph appears to have a scope, at least potentially, wider than the designated Local Green Spaces. Therefore, to avoid confusion with the Policy actually designating spaces, it may be helpful for the ‘improvement’ element to be separated out as a separate Policy?

### **Policy 3.4: Millennium Green**

It is not clear from the details provided that this is a land use policy – it could more likely be about the range of community activities which is accommodated on the field, which probably would not constitute ‘development’ (and might better be accommodated by a Community Policy)?

### **Policy 3.5: Glebe Estate Playing Field**

Given that the issue of Local Green Space designation has been addressed at Policy 3.3, the Policy wording here appears to be more a statement of fact than Policy. A Community Policy would be the more appropriate route to the Parish committing to the upkeep of this Field?

### **Policy 3.6: Allotment Land**

As with Policy 3.5 above, a Community Policy would be the appropriate route to the Parish committing to the retention of this Allotment Land?

Your comments on the above lines of thought, particularly before I visit Tilney All Saints, are invited.

## **6.3 Community Infrastructure Levy**

Whilst it is accepted that “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, [but] actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.” (Planning Policy Guidance Paragraph: 004 Reference ID: 41-004-20170728). I believe it would be helpful for the “Community Policy” elements – some others noted prospectively above – to be brought together in a separate section/annex, not least for the benefit of the Parish Council. Your comments on this line of thought are invited.

## **7.0 Traffic & Transport**

Whilst I can see that this topic area has given rise to local concerns, it is a tricky subject to address separately and appropriately in a land use plan. Traffic generation and related mitigation are already material considerations in the determination of planning applications but such factors must be assessed consistently across all applications. Assertions such as “Tilney All Saints Neighbourhood Plan robustly supports cleaner energy technologies” do not amount to Policy but tend to disguise the fact that the Plan can only influence matters that involve a planning application. The Plan does not envisage significant development.

### **Policy 4.1: Sustainable Transport**

There would appear to be two aspects of this Policy that are particular to the Neighbourhood Area (and might not therefore be addressed in existing, higher-level policies):

“Development proposals for the school will need to be supported by a School Travel Plan setting out how sustainable access to the school will be improved and promoted.” The preamble does not acknowledge whether the School already has a School Travel Plan but the expectation of a whole school plan being a condition of a single classroom extension might be seen to be onerous? There is a policy overlap here with Policy 3.1.

“Proposals that include improved connectivity towards neighbouring villages, King’s Lynn and Wisbech for sustainable modes of transport, especially cycling, will be viewed favourably.” It may be unrealistic for the scale of development envisaged in the Plan to support these ambitions. As standalone proposals there is little detail provided about what might be entailed here.

Your comments on the above lines of thought are invited.

### **Policy 4.2: Car Parking**

The local authority comments: “The car parking space requirement goes above what is required by Norfolk County Council so there is concern that that this is onerous and may lead to unnecessary constraints in design and appears to go against the sustainable travel objectives. Another point is the policy doesn’t state that garages can be included in the number of parking spaces.” I would also add that the Policy seems to be equivocal about on-street parking which, it seems to be suggested, should be avoided but it also may provide “informal traffic calming measures to help slow traffic”.

Whilst not appropriately a part of the Policy itself, I note that “This proposal was supported by 95% of responses received from villagers when asked the question”. However, the issue needs properly to be considered in combination with Policy 4.3 that expects “design that complements the rural character and appearance of the parish”.

Your comments on the above lines of thought are invited.

### **Policy 4.3: Transport Infrastructure and Services**

This Policy appears to be inappropriately directed at the planning decision-maker whereas the Plan is advising the prospective developer on what basis they could expect a planning

approval. Also there appears to be significant overlap with Policies 4.1 and 4.2. As the Plan does not envisage significant development it might seem an unrealistic expectation for these ambitions to be funded on a voluntary basis by developers, or even in combination from generated CIL funds. If not a Community Policy then perhaps some further clarity could be achieved through combining the target of this Policy with the related element of Policy 4.1? Comment invited.

## **8.0 Employment & Business**

### **8.1 Economic Development**

In general terms Policy 5.1 encourages more economic activity within the Development Boundaries but the preamble says: “The Neighbourhood Planning group wishes to encourage *similar* small-scale businesses into the village”. The preceding paragraphs however mention a whole range of activities, not all of which may be considered small-scale. It is therefore unclear what the term “small-scale”, picked up in the Policy, might mean in the local context. Comment invited.

### **8.2 Broadband**

No evidence has been provided to suggest that there is a particular broadband land-use-related issue in Tilney All Saints, in particular one that would not be adequately covered by national and Borough planning policy. Your comment on the value of Policy 5.2 is therefore invited.

### **8.3 Renewable Energy**

The local authority has commented: “Can this policy be more specific; at the moment it is very broad and says that renewable energy schemes will be supported but in the supporting text they appear to instead be against certain renewable schemes. Can this policy be reworded to reflect your concerns while still having a proactive stance?” The NPPF already says (footnote page 45) “a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing”. This may provide sufficient reassurance on the matter of wind turbines? Your comments on the value of Policy 5.3 are therefore invited.

## **9.0 Implementation and Monitoring**

The final paragraph mentions “As part of the preparation of the Neighbourhood Plan, an Implementation Plan will be developed.” Whilst I can see that this may be appropriate for the Community Policies, it is less obviously applicable to the Neighbourhood Plan where no new land is allocated. Your comments are invited.

## **Appendices**

All the maps in the Appendices are presented with admirable clarity – subject to any particular comments above – and with attention to important detail such as the provision of a scale. Subject to your comments on the Local Green Space designations a sight of the

boundaries on the ground, there may be a need to provide, for absolute boundary clarity, larger scale maps for each Local Green Space.

The source of the data forming the Appendix “APPENDIX J – PUBLIC RIGHTS OF WAY: Definitive Statements for the Parish of Tilney All Saints” is unstated.