

**Health-Check Review of the emerging;  
Hungarton Neighbourhood Development Plan**

**Report prepared and submitted by;**

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## Overview

The Parish of Hungarton, within the District of Harborough, lies to the East of Leicester in the County of Leicestershire. The area is dominated by the small rural settlement of Hungarton itself, complemented by two smaller hamlets. The area is served by a series of smaller public highways and is not a commercial centre in its own right. Few if any retail outlets serve the community. The total population of the parish is circa 283 (2011 census) and many residents commute to Leicester, Melton Mowbray, or Market Harborough to access employment, commercial and leisure facilities. The parish is, however, noted for its established rural landscape and its historic buildings.

Given its location, the nature of the area, and the lack of any major commercial settlement, the Parish has not been the centre of growth in recent years, moreover it has supported an aging population with a decline in rural services and has become a commuter area for the wider region.

The proposed Hungarton Neighbourhood Development Plan (HNDP) has been prepared by Neighbourhood Development Plan Committee of the Parish Council. The emerging document and has been the subject of local consultation and assessments addressing factual evidence, needs and aspirations of the community. The main findings from the consultations and engagement, undertaken to date, complement the long standing priorities endorsed by the LPA and have clearly been developed with reference to the basic conditions, as required under the Neighbourhood Planning (General) Regulations 2012

A series of policies have been developed, reflecting the consultations undertaken, and together with a number of supporting documents, have recently been issued as a 'Consultation Version' of the Plan.

This review takes the form of a Health Check of the policies within the Consultation Version of the HNDP, which are currently the subject of a pre-submission public consultation period. This period runs between 20<sup>th</sup> July and the 7<sup>th</sup> September 2016. Comments submitted to the Consultation Version of the HNDP will be collated by the Qualifying Body, reviewed and addressed where necessary with the goal of presenting a Submission Version of Plan to the Local Planning Authority, Harborough District Council, for formal examination, within the coming few months.

To provide context for this Health Check review, it is considered helpful to confirm the following matters:

The 'Qualifying Body' (QB) comprises the Hungarton Parish Council, guided by a Neighbourhood Development Plan Committee which was first convened in May 2015. The Committee, chaired by James Patterson has advised on the various stages of the Neighbourhood Plan's preparation. Correspondence and documents supporting the Consultation Draft Plan have been issued by Caroline Pick.

The Local Planning Authority comprises Harborough District Council. This authority adopted the Harborough Core Strategy Development Plan Document (PPD) in November 2011. This sets out the strategic planning policy for the District, including a 'spatial' vision and objectives. It also sets out a development strategy identifying the level of development expected to take place across the District up to 2028. It incorporates some saved policies from the previous Local Plan for the District. Of specific relevance is CS policy CS17 addressing the countryside, rural centres and rural villages.

It should be noted that a new Local Plan is being prepared and due to be adopted in 2017. However, the draft Local Plan has yet to be issued for Inquiry and the District have confirmed that it not been able to identify a five year residential supply.

The District Council's key officer addressing emerging Neighbourhood Plans is Matthew Bills. Discussions have been held with Mr Bills and the summary comments within the Review Table below reflect that dialogue.

In order for this Health Check Review to be effective and to be of assistance to the parties concerned, namely the QB, the LPA and in turn to the community of Hungarton, a review of the background papers supporting the Consultation Draft HNPP has been undertaken.

The Summary Table below reflects a standard Health Check approach and hence contains a set of generic questions. In order to address these, it has been important to undertake a review of how the Plan policies have emerged and have been development, how the consultation process has been progressed and what supporting information and evidence has been compiled to date. It should be stressed that this Health Check Review has not concerned a forensic examination of every supporting documents but has taken an overview approach, highlighting issues that may need to be expanded upon or clarified as the Plan proceeds to Examination. Where required, factual responses have been presented. In other cases a subjective view reflecting a professional assessment of the process to date, and the issues which have arisen, has been presented.

In summary, it is apparent that both the QB and the LPA have worked successfully together, to date, and have interpreted the Regulations in a similar and appropriate way. This has been greatly assisted by the dedicated officer from the LPA who has, and continues to oversee a number NPs across the District. This has ensured that the general approach taken by the QB has reflected the statutory requirements.

Suggestions and references which may assist the parties concerned and which might assist the ongoing process have been highlighted in bold. These are repeated below in the Summary of Recommendations.

For expediency a number of abbreviations have been used throughout the Summary Table and for the avoidance of doubt, these relate to the following:

The Regulations – The Neighbourhood Planning (General) Regulations 2012  
HNDP - Hungarton Neighbourhood Development Plan  
QB - Qualifying Body, namely the Hungarton Parish Council  
SoCBC –Statement of Compliance with Basic Conditions  
LPA - Local Planning Authority, namely Harborough District Council  
CS – Core Strategy  
NPPF – National Planning Policy Framework

**Summary of Recommendations:**

**It is suggested that;**

- The extensive evidence base should, where appropriate, be further cross referenced within the text of the HNDP or included as specific appendices.
- The identification of the approved HNDP area, with particular reference to the omission of land to be transferred to the adjacent Parish and covered in a separate NP, could be explained in the introductory section to the HNDP. This does not need to be extensive but would assist in setting the context for the Plan.
- Key documentation relating to the confirmation of the area by the LPA could be appended to the Consultation Statement – to complement the letter from the QB to the LPA indicating the aspirations of the Parish Council to pursue a NP.
- The SoCBC document would benefit, from a number of small amendments, additions and points of clarification , as listed in Section 2.1 below
- The main HNDP would benefit, from a number of amendments, additions and points of clarification, as listed in Section 2.1 below
- While a sustainability statement has been included within the SoCBC, it is suggested that a fuller analysis of sustainability issues could be presented, that cross-reference specific HNDP policies.
- If the Community Action Policies are presented as forming part of the HNDP proposals then this needs to be clearly explained. As it stands, there is a degree of ambiguity.

## Part 1 – Process

	Criteria	Source	Response/Comments
1.1	Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?	Telephone conversation with LPA, review of relevant correspondence issued between LPA and QB, documents posted on public web sites, and minutes of Committee meetings.	<p>An application by Hungarton Parish Council was initially made to the LPA in May 2015 in accordance with Part 2 of the Regulations. This presented the Parish Council as a ‘relevant body’ in terms of Section 61G of the 1990 Town and Country Planning Act.</p> <p>The correspondence available indicates that a pragmatic approach to the designation of the NP area was taken at the outset. This involved discussions with the adjacent Parish Council for Houghton and the subsequent agreement over an area of land to the south of Hungarton Parish that better related to Houghton. Agreement was reached by way of a Memorandum of Understanding between the two parish councils, in May 2015, with the inclusion of the land in question to fall under the jurisdiction of Houghton for the purposes of neighbouring planning. This has had bearing on the formal endorsement of the HNDP area and ensured that no land was covered by more than one NP. (Separate discussions are ongoing with the Electoral Services team to amend the Parish boundary permanently)</p> <p>I have seen no evidence, to date, of the LPA using the PAS checklist which is commonly used by many authorities as a ‘self-certification’ tool but I understand that protocol within the LPA are similar in approach.</p> <p>On review of the correspondence between the salient parties, and with the exclusion of the land to the south of the Parish, no matters of concern appear to have been highlighted and indeed, as reflected in other sections of this Summary Review, it is considered that the approach taken by the QB has been appropriate.</p> <p>In summary, Hungarton Parish Council, as the deemed QB under the extant regulations (discussed below), applied for the designation of the Hungarton Neighbourhood Area in May</p>

			<p>2015. The consultation period as per Part 2 Regulation 6 of the Regulations, was published for a 6 week period ending, on 17th July 2015. In the absence of any issues of concern, the designation of the area was approved by the Portfolio Holder for Planning Services at Harborough District Council on 21th July 2015 and appropriate confirmation was posted on the LPA web site.</p> <p>Hence, from the documentation available and from discussions with the key parties, it is understood that the designation process was pursued correctly and confirmation issued by the LPA – by email – following appropriate advertising of the extent of the NP area.</p> <p><b>It is suggested, that the identification of the approved area, with particular reference to the omission of land to be transferred to the adjacent Parish and covered in a separate NP, could be explained in the introductory section to the HNDDP. This does not need to be extensive but would assist in setting the context for the Plan.</b></p> <p><b>It is also suggested that key documentation relating to the confirmation of the area by the LPA is appended to the Consultation Statement – to complement the letter from the QB to the LPA indicating the aspirations of the Parish Council to pursue a NP.</b></p>
1.2	<p>If the area does not have a parish council, have the necessary statutory requirements been met in terms of the designation of the neighbourhood forum?</p>	<p>Review of relevant correspondence issued between LPA and QB, documents posted on public web sites, and minutes of Committee meetings.</p>	<p>As noted above, the NP has been instigated and pursued by Hungarton Parish Council which created a Neighbourhood Development Planning Committee to steer the preparation of the Plan. This Committee has met on a regular basis since May 2015.</p> <p>The Parish Council's appointment as a Qualifying Body (QB) has been accepted by the LPA and is further to Section 61G of the 1990 Town and Country Planning Act. As noted above, the area proposed by the Parish Council to constitute the NP area was pursued appropriately and confirmed as being in accordance with the Regulations</p> <p>The NP Committee has been instrumental and effective in preparing all necessary</p>

			<p>submissions which have been made via the Parish Council to the LPA and indeed have led on the public consultation and engagement approach to date.</p>
1.3	<p>Has the plan been the subject of appropriate pre-submission consultation and publicity, as set out in the legislation, or is this underway?</p>	<p>Consultation Statement, telephone conversations with LPA, review of relevant correspondence issued between LPA and QB, documents posted on public web sites, and minutes of Committee meetings.</p>	<p>The consultation approach adopted to date by the QB has been extensive, effective and robust. A summary statement (further to Section 15(2) of the Regulations), explaining the approach taken to date and the rationale behind the nature of the consultation process is clear and easy to follow. As such it is found to be appropriate in terms of the Regulations.</p> <p>It is important to highlight that the QB appointed professional advisers to guide the preparation of the NP. As a questionnaire was prepared and circulated to all parish residents, the Planning Committee instigated a series of theme groups which met regularly and addressed housing, the environment, and transport /the economy /community facilities.</p> <p>The community discussions, review of comments, liaison with the LPA and modification of policies as the consultation exercise progressed has been clearly explained. Indeed, the evolution of the NP has illustrated a good understanding of the rationale which supports the NP approach to 'bottom up' planning. It has successfully invited the community to initiative and then comment on suggested land use related initiatives, which included progressing a 'mini SHLAA' to invite suitable sites to come forward for residential development.</p> <p>The questionnaire issued in March 2016 was a pragmatic presentation of the comments received by that time and has helped shaped the eventual NP policies.</p> <p>Publicity of the process has been effective and good use has been made of local noticeboards, parish newsletters, email, personal contact and a clear web site. While social media was not adopted, this reflects the nature of the community and is not a great omission.</p>

1.4	Has there been a programme of community engagement <b>proportionate</b> to the scale and complexity of the plan?	Consultation Statement, telephone conversations with LPA, review of relevant correspondence issued between LPA and QB, documents posted on public web sites, and minutes of Committee meetings.	<p>Given the comments for the preceding question, it is considered that the community engagement programme has been effective and proportionate. From the Committee Meeting minutes, it is clear that a consultation programme was discussed at the outset, although this has not been acknowledged in the Consultation Statement. This is not a significant omission as the activity undertaken has been productive.</p> <p>A total of 5 consultation exercises have been held to date with the NP adapting appropriately in the light of comments received. This would seem proportionate to the size of the NP area and the population concerned.</p> <p>There has been little evidence of sections of the community being ignored or landowners not invited to take part in proceedings. Hence it is considered the consultation approach has been, generally, appropriate. Indeed, there has been a successful balance of inviting comment, responding to those comments and progressing the NP – so as to avoid ‘consultation overload’.</p> <p>Overall, the Consultation Statement is a clear indication of the work undertaken and is supported by an appendices of all necessary documents.</p>
1.5	Are arrangements in place for an independent examiner to be appointed?	Dialogue with LPA.	<p>The onus of appointing the independent examiner falls with the LPA but this process has not yet been commenced. Officers have advised that from their experience, this takes only a few weeks and template contracts can be issued quickly once the HNDP is submitted for Examination i.e. the Reg 16 Submission. The approach is that they await that Submission before making an Examiner appointment. However, it should be noted that this approach risks a reduce choice of Examiner, particularly as more NDPs are reaching the Examination stage.</p>



1.6	Are discussions taking place with the electoral services team on holding the referendum?	Dialogue with LPA	Officers have confirmed that a meeting is currently being convened with the Electoral Services team to discuss the current round of submissions across the District. And determine a timetable for referenda. Harborough Electoral Services team have experience of three referenda, to date, and has a track record of working well with the LPA officers and community.
1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?		<p>It is understood that comments on the Consultation Draft NP will be reviewed by the QB by the beginning of October and decision taken at that time as to the preparation of a the Submission Version of the plan and its presentation to the LPA for examination.</p> <p>No formal timetable has been highlighted but it is expected that any modifications to the emerging document could be made expeditiously.</p> <p>It is understood that the progress of the NP will not be unduly affected by the LPA committee cycle and in any event a 'Scheme of Delegation' is in place which allows officers / the Portfolio Holder to make decision in certain circumstances, otherwise an Executive Committee Report is required. Either approach is not expected to be protracted and hence the overall timetable for the eventual approval of the NP is envisaged to be completed during the coming 4 to 6 months – further to any Referendum.</p>
1.8	Has an SEA screening been carried out by the LPA?	Paragraph 8 of Schedule 4b Statement and telephone conversation with LPA.	<p>The LPA is in the process of confirming its position with respect to the need for an SEA or an HRA screening.</p> <p>The initial verbal indication from the LPA is that, given the nature of the NP and the proposed polices, and the fact that no protected area is affected by the proposals, an SEA is not required.</p> <p><b>The LPA's formal confirmation of this matter needs to be clearly set out and make all appropriate reference to salient environmental regulations. Comment from relevant</b></p>

			<p><b>statutory bodies will also need to be clear and unambiguous to avoid the potential threat of judicial review by a third party.</b></p> <p>In this case, given the nature of the area and the lack of any major new development sites and that this approach would not create <i>significant</i> environmental impact, it is considered that an SEA should not be required. Clearly, this situation would change if more extensive housing development is progressed in place of the smaller scale sites as currently proposed in the draft HNDP.</p>
1.9	Has an HRA screening been carried out by the LPA?	Paragraph 8 of Schedule 4b Statement and telephone conversation with LPA.	It is understood that the LPA is in the process of confirming its position with respect to its HRA screening but no issues of concern appear to have been raised to date.

## Part 2 – Content

	Criteria	Source	Response/Comments
2.1	Are policies appropriately justified with a clear rationale?	Consultation Version, Statement of Compliance with Basic Conditions	The draft version of the Statement of Compliance with Basic Conditions (SoCBC) which accompanied the consultation version HNDP, is relatively clear in its rationale and its explanation of how the HNDP complies with the Regulations. However its initial introductory sections are a little confusing in that the SoCBC supports the HNDP and not the other way round.

			<p>Also, statements have been included relating to the status of the Parish Council as a QB, but with no supporting correspondence. Similarly, general reference is made to supporting documents but few publication dates are included.</p> <p>Hence in terms of <b>the SoCBC document, it is suggested this would benefit, from inclusion of better overall referencing in terms of:</b></p> <ul style="list-style-type: none"> <li>- Dates of any reference document eg Local Plan,</li> <li>- Inclusion of correspondence from the LPA confirming the designation of the NP area</li> <li>- Consistency in reference to the Hungarton NP. In the main document this is generally as the 'neighbourhood plan' while in the SoCBC it is the 'Neighbourhood Development Plan'.</li> <li>- Para 3.5 of the SoCBC should accurately refer to the exclusion of some of the Parish land to the south.</li> <li>- Section 4.0 of the SoCBC refers to the HNDP being prepared with regard to the NPPF and the strategic policies of the Harborough District Core Strategy (2006-2028). It then advises that it has had reference to the emerging Local Plan and a date indicated as to its possible adoption in November 2017. The adopted policies in the Core Strategy for the NP area are the relevant policies and while regard can be given to emerging policies, this weight of this needs to be carefully explained. The SoCBC does not do this although reference is made in the main HNDP to emerging LP policies. Hence a little confusion arises as to whether the emerging policies have influenced the proposals HNDP policies and if so, to what degree.</li> <li>- While a sustainability statement has been included within the SoCBC, it is suggested that a fuller analysis of sustainability issues could be presented, that cross-reference specific HNDP policies.</li> <li>- It is understood that reference to the HNDP Habitats Regulations Screening Report and SEA Screening Report are current in draft and will need to be completed once the respective correspondence is issued by the LPA.</li> </ul> <p>Turning to the <b>main HNDP Consultation Version</b>, as presented publically on the Parish Council and LPA web sites;</p>
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			<p>This is generally well presented with a reasonable introduction to the rationale of the Plan, some cross reference to supporting documents and a clear set of reasoned policies.</p> <p>Given the well set out Community Statement and SoCBC, it is not necessary to include substantial text that would simply reiterate information found in those complementary and supporting documents, however, a degree of cross reference would be helpful.</p> <p><b>Section 2 presents a good overview and rational for the Plan and it is suggested this could make a better initial introduction – followed by the text currently presented as Section 1, which sets the geographical, historic, heritage, social and residential context.</b></p> <p>Although Chapter 3 sets out the ‘strategy’ of the Plan, this is more commonly referred to as the ‘Vision’ and has been interpreted as such. Specific policies relating to housing; natural and historic environment; community facilities and amenities; economy; and transport follow and are all generally well set out and easily followed. They reflect the nature of the comments raised during the various consultation and engagement exercises and many have been the subject of appropriate modification from their initial drafting.</p> <p>Generally the policies are relevant, appropriate and add to the strategic policies already in place for the District.</p> <p>Some consideration could however be given to the following;</p> <p><b>The numbering of the document is a little difficult to reference and it would help considerably if paragraphs were numbered throughout.</b></p> <p><b>Throughout the document there is reference to Community Action Policies, yet no clear explanation of how these differ from the main policies, is given. This should be clarified and an explanation given as to why two types of policies are presented.</b></p>
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			<p>Page 9 - The initial paragraph of Section 2 of Chapter 3 repeat much of the text from the extant Chapter 1. This is unnecessary.</p> <p>Page 10 - The housing needs study supporting the housing policies is considered robust and well presented thus supporting the housing policies within the Plan. However, reference to the emerging Local Plan for Harborough District would benefit from the inclusion of publication dates. Reference could also be made to the extant classification of the village.</p> <p>Page 11 - Some acknowledgement needs to be given in Policy H1 or in the accompanying text that the provision of 5 additional dwellings on the sites identified is the preference of the Plan. Development of these sites could have come forward given the extant policies for the area, in any event, and indeed proposals may come forward which run counter to the identification of these sites, but which would otherwise be acceptable given extant strategic policy and other policies within the NP. Furthermore, acknowledgement of the use of permitted development rights could be given.</p> <p>Page 11 - Reference to the Housing Bill is assumed to mean the Housing and Planning Act 2016 and should be amended accordingly</p> <p>Page 14 – the reference at the end of Policy H2 to ‘other eligible households’ should be qualified.</p> <p>Page 15 – Fig 2 could benefit from a key to identify the sites in question, as opposed to relying on colour – which is difficult to interpret if the document is printed in monotone.</p> <p>Page 17 – Policy H4 should refer to figure 3, erroneously it refers to figure 1.</p> <p>Page 18 – (f) and reference to the Conservation Area and important buildings of special architectural or historic interest may be better located within Section 3 of the HNDDP</p>
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		<p>Page 20 – the list of statutorily protected property would be better included within an appendix to the Plan.</p> <p>Page 22 – while it is acknowledged that the public consultation highlighted the need to preserve and enhance locally important heritage property, Policy H6 provides greater protection to non-designated assets than to designated ones and may be considered to go too far. Consideration should therefore be given to a less demanding word than “required”. The use of “expected” would be more appropriate together with the addition of “in line with the Planning (Listed Buildings and Conservation Areas) Act 1990”. Additionally, “conserve and enhance” would be better replaced with “conserve or enhance”.</p> <p>Page 22 – it is acknowledged that the details contained with the design section (g) reflects much of the comments raised during the consultation periods and highlighted in the substantial evidence base prepared by the QB. However, given NPPF paragraphs 58 to 60 care should be given to unnecessary prescription or detail. It is suggested that LPA need to confirm that the proposals as currently presented are sufficiently robust without being overly prescriptive or repeat controls already in place under different powers (eg footpaths and the need for a maximum width of 1.4m – this would be subject to County Council Highway jurisdiction and within existing highway land would not be a planning matter)</p> <p>Page 23 – the text contains a repeat of previous sections of the Plan. Reference to ‘new signage proposals’ need qualification with the text having regard to extant advertisement regulations and deemed consent.</p> <p>Page 24 – developers should be “expected” or “encouraged”, rather than “required”, to present ‘Design and Access’ statements unless they fall within the Conservation Area where there is an obligation for these to be prepared under Article 2 of the Town and</p>
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			<p>Country Planning (Development Management Procedure (England) Order 2015 or otherwise required by law.</p> <p>Page 26 – reference to the employment of an ‘experienced architect’ is considered onerous. The reference to ‘contemporary design features’ and their appreciation is considered vague and subjective.</p> <p>The checklist of sustainable elements includes a number of subjective references; reference to a ‘minimum SAP rating of 90’ should be qualified, and acknowledgment given to ‘any other relevant national guidance’; reference to airtightness to exceed minimum requirements; orientation towards the sun; ‘quality of workmanship found wanting’ and the use of ‘must’ as opposed to ‘encourage’ require review. It should be redrafted to avoid conflict with the Written Statement of the Rt Hon Sir Eric Pickles MP at <a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a>.</p> <p>Page 27 – policy H7 refers to Building Design principles for residential development, yet the design principles refers to general development. A consistent approach and reference would be helpful and qualification given to allow for circumstances when material considerations means that the guidance cannot be followed.</p> <p>Page 28 – it is unclear in policy H8 if tandem development that doesn’t incur any of the concerns listed would be acceptable.</p> <p>Page 29 – while the principle of identifying Local Green Spaces (LGS) is supported by the consultation exercises undertaken to date, the sites highlighted in policy ENV1 include 4 relatively large sites which, may not fully comply with the third bullet point of paragraph 77 of the NPPF, namely sites 01, 05, 06 and 11 as shown on Figure 5. This raises a high risk that the allocation of these parcels of land as LGS is tantamount to restricting growth of the village, should this be required in the future. In any event, areas 01, 05 and 07 are already highlighted as ‘important Open Land in the extant CS and hence subject to a</p>
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			<p>degree of protection.</p> <p>Page 33 – reference to ‘significant’ local habitats and species in policy ENV4 should be qualified.</p> <p>Page 35 – for clarity it is suggested that the phrase ‘non-designated’ is qualified to explain that it reflects the NPPF in that these elements do not currently enjoy statutorily designated protection.</p> <p>Page 41 – the evidence base to support policy ENV8 and the protection of important views needs to be fully referenced. Reference to ‘strong resistance’ to development that may impact on these views should be fully qualified and allowance made for development supported by ‘exceptional circumstances.’</p> <p>Page 43 – the principle of policy ENV9, protecting footpaths and bridleways, is covered by the Highways Act and hence is superfluous.</p> <p>Page 44 – it is unclear why Community Action policy ENV5 is required to supplement policy ENV10.</p> <p>Page 44 – the reference to ‘every development’ in Policy ENV11 should be qualified with reference to ‘development of appropriate scale and where relevant’. The addition of map indicating relevant flood zones would be helpful.</p> <p>Page 48 – the reference to ‘unacceptable traffic movements’ within policy CF2 is subjective and should be qualified</p> <p>Page 49 – policy E1 and the accompanying text needs to acknowledge the use of permitted development rights and the conversion of rural property and B1 accommodation for residential purposes.</p>
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			<p>Page 50 – the reference at (f) of policy E2 referring to ‘unacceptable levels of traffic movement’ is subjective and need qualification. The general intent of this policy would be best presented as ‘encouraging development’ as opposed to ‘requiring development’ to address the list of criteria</p> <p>Page 53 – acknowledgement could be given in the text accompanying policy E5, to the statutory powers held by some providers.</p> <p>Page 54 – policy T1 and accompany text could include reference to the role of the County Highway Authority.</p> <p>In summary, while little explanation has been given to the presentation of separate Community Action policies, the rationale for each of the main policies within the HNDD have been justified in terms of the basic conditions and supported by appropriate evidence.</p> <p>The HNDD is well set out in plain English. While some qualification is required and minor modifications have been suggested, the HNDD and accompanying Statement of Basic Conditions provides good cross reference to relevant adopted Core Strategies and reference to salient sections of the NPPF.</p> <p>The evidence base is strong and well prepared. <b>It could, in places, be better cross referenced in the main document and included in a relevant appendix.</b></p>
2.2	Is it clear which parts of the draft plan form the ‘neighbourhood plan proposal’ (i.e. the neighbourhood	Consultation Version and review of supporting documentation	It is understood that the QB Planning Committee, at the outset, advised that the emerging NP should be a robust ‘development plan’ and as such should refer to land use matters which would then be subject to full examination. This has generally been the case.

	<i>development plan</i> ) under the Localism Act, subject to the independent examination, and which parts do not form part of the ‘ plan proposal’, and would not be tested by the independent examination?		<p>The exception is the reference to a number of ‘Community Action’ policies. While these relate to and reflect the overall strategy of the Plan, in places they deal with management issues and the promotion of community ideals and aspirations. It is assumed that these policies have been highlighted separately because they might not be deemed to be land based policies.</p> <p>Nevertheless, while some of them could be incorporated within or as additional ‘main’ policies, it is at the discretion of the QB as to how they wish to present the Plan.</p> <p><b>If the Community Action policies are presented as forming part of the plan proposals then this needs to be clearly explained. As it stands, there is a degree of ambiguity.</b></p>
2.3	Are there any obvious conflicts with the NPPF?	Consultation Version, NPPF and Paragraph 8 of Schedule 4b Statement.	<p>On review of the consultation version of the HNDDP, the only conflict with the NPPF is with respect to the detail contained with the Design Guidance set out at (g) of the Housing section of Chapter 3 of the Plan and referenced in policy H7. Comment is made on this above.</p>
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?	Consultation Version and Paragraph 8 of Schedule 4b Statement.	<p>While reference has been made to sustainability issues within the Statement of Compliance with the Basic Conditions and within the initial explanatory sections of the Plan, and indeed is one of the principle ‘Strategy Policies’ (S1), <b>no detailed Sustainability Statement has been presented to date. It is suggested that this or a fuller analysis of sustainability issues could be included within the formal submission.</b></p>
2.5	Are there any issues around compatibility with human rights or EU obligations?	Paragraph 8 of Schedule 4b Statement	<p>To date, neither the QB nor the LPA have indicated any breach of human rights or conflict with EU obligations. On review of the documentation before me, I accord with this general position.</p>

2.6	Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?	Consultation Version.	Hungarton is not affected by excluded development, as defined by the Regulations and hence has not needed to specifically address this matter.
2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?	Review of; Committee minutes and exchange of correspondence between LPA and QB Planning Committee; Paragraph 8 of Schedule 4b Statement and dialogue with LPA and QB.	There is currently agreement between the QB and the LPA that the emerging HNNDP meets the basics conditions.
2.8	Are there any obvious errors in the plan?	Consultation Version,	As noted above, there is some ambiguity in places, and a need for minor additions and modifications to the text and policies as currently proposed.  There are very few grammatical or typographic errors but nothing that warrants undue concern and which would not be picked up further to the final production of the Submission Version of the Plan and a final proof reading.
2.9	Are the plan's policies clear and unambiguous and do they	Consultation Version,	Notwithstanding the suggestions highlighted within section 2.1 of this Health Check review, the presentation of the Consultation Version of the HNNDP is effective, justified and well-

	reflect the community's aspirations?	consultation statement.	<p>reasoned in terms of the evidence base collated to date and the consultation and engagement exercises.</p> <p>There is a clear explanation of the rationale behind the proposed policies - with the exception of the presence of separate Community Action policies, as discussed above.</p> <p>The emerging Consultation Statement gives a good explanation of the how community consultation has been managed and progressed. It identifies who has been involved, the approach taken to date and the response to comments made. This reflects an effective process which has taken the form of public engagement with a goal of empowering this rural community.</p> <p>The proposals have been generally set out well - notwithstanding the comments raised elsewhere in this review, which are suggested to assist the process. These are not excessive, nor are they fundamental to the success or otherwise of the NP - but simply reflect the scale and number of policies.</p> <p>Hence, overall, while some clarity is suggested for some individual policies, the overall approach is considered to be unambiguous and has been presented in a way that clearly reflects the community's aspirations.</p>
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**September 2016**