

# **EVERTON NEIGHBOURHOOD PLAN**

## **Health Check**

**A Neighbourhood Plan Health Check to  
Bassetlaw District Council  
By Independent Examiner, Rosemary Kidd**

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## 1.0 Summary

- 1.1 The Everton Neighbourhood Plan is being prepared to set out the community's wishes for the parish of Everton to address, as far as possible, the challenges that face the community and to reflect the aspirations of everyone in the village.
- 1.2 The purpose of the health check is to raise any concerns about whether the draft Plan meets the Basic Conditions and other legislative requirements so that these may be addressed before the Plan is submitted for examination. The report also raises other concerns with the aim of ensuring that the Plan is as robust and effective as possible.
- 1.3 The main recommendations concern:
- A number of the policies are fairly generic in their form of wording. As a general comment, neighbourhood plan policies should add locally distinctive details to the strategic policies. Policies that repeat strategic policies or add little to them are likely to be deleted by the examiner as unnecessary and superfluous.
  - The justification to the housing policies should be revised to provide a clearer explanation of how the housing requirement has been derived. It may be helpful to prepare a short background evidence report to set out the options that have been considered in determining the housing requirement. Policy E8 should set out the housing requirement and describe how this is to be met during the life of the plan.
  - The Sites Assessment criteria, the summary assessment table and the current position statement are clear. The report could be improved with descriptions of each site. The various reports on sites assessment should be collated into a single report.
  - Policy E10 should be revised to explain the affordable housing need and how it is to be provided in the plan area.
  - Other revisions are proposed to improve the clarity and robustness of the wording of policies.
- 1.4 The Basic Conditions Statement and Consultation Report are clear and comprehensive. I have not seen the SEA/HRA Screening Reports. It is suggested that they should be checked to ensure that no changes have been made to the revised Plan that would warrant a review of the Screening Reports.

**Recommendations are set out in bold type with new text in *italics*.**

## 2.0 Introduction

- 2.1 Everton Parish Council is preparing a neighbourhood plan to help shape the future of the parish. The neighbourhood plan provides the community with the opportunity to develop a vision to steer the planning of the future of the parish, to prepare the policies and allocate land for development which will be used in the determination of planning applications in the parish. Neighbourhood Plans are developed by local people in the localities they understand and as a result each plan will have its own character.
- 2.2 The purpose of the health check is to raise any concerns about whether the Plan meets the Basic Conditions and other legislative requirements so that these may be addressed before the Plan is submitted for examination. The report also raises other concerns with the aim of ensuring that the Plan is as robust and effective as possible.
- 2.3 I have been appointed by Bassetlaw District Council with the consent of Everton Parish Council to undertake this health check. I am independent of the Parish Council, the Neighbourhood Plan Steering Group and Bassetlaw District Council. I do not have any interest in any land that may be affected by the Neighbourhood Plan. I am a chartered town planner and have over 30 years' experience in planning policy development in local authorities. I am an experienced neighbourhood plan examiner.

### Legislative Background

- 2.4 A Neighbourhood Plan is required to satisfy legislative requirements set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990:
- (a) the policies of the Neighbourhood Plan relate to the development and use of land for a designated neighbourhood area;
  - (b) the Neighbourhood Plan meets the requirements to: specify the period to which it has effect; not include provision about excluded development; and not relate to more than one neighbourhood area;
  - (c) the Neighbourhood Plan has been prepared for an area that has been properly designated for such plan preparation; and
  - (d) the Neighbourhood Plan has been prepared and submitted for examination by a qualifying body.
- 2.5 Section 2 of the Basic Conditions Statement confirms that all these points have been met.
- 2.6 The Neighbourhood Area is co-terminus with the parish of Everton. Map 1 shows the plan area. Paragraph 2.1 of the Plan states that the neighbourhood area was designated on 18 December 2015 by Bassetlaw District Council. Everton Parish Council is the qualifying body responsible for the preparation of the Neighbourhood Plan.

- 2.7 The front cover of the Plan shows the Plan period as 2018 – 2034. It is suggested that all background documents are checked to ensure that they are consistent with these dates. The Plan and background documents should refer to the plan period of 16 years.
- 2.8 The plan includes policies relating to the development and use of land. It does not contain policies relating to excluded matters such as minerals or national infrastructure. It does not include any policies relating to non land use matters such as community aspirations.

### **Basic Conditions**

- 2.9 The Independent Examiner will consider whether a neighbourhood plan meets the “Basic Conditions”. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
  2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
  3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
  4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
  5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to Neighbourhood Plans:
    - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) sets out a further basic condition in addition to those set out in the primary legislation. That the making of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects). (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended).

### **Has regard to national planning policies**

- 2.10 The first basic condition is for the neighbourhood plan “to have regard to national policies and advice contained in guidance issued by the Secretary of State”. The National Planning Policy Framework 2012 (NPPF) sets out the Government’s planning policies for England and how these are expected to

be applied. The Planning Practice Guidance provides Government guidance on planning policy.

- 2.11 Table 1 of the Basic Conditions Statement includes an assessment of the Core Planning Principles of the NPPF and the policies of the Everton Neighbourhood Plan. I have highlighted areas where the plan and its policies may not accord with this Basic Condition in section 3 of my report on the health check.

### **Contributes to sustainable development**

- 2.12 Table 2 of the Basic Conditions Statement includes an assessment of the contribution of the plan towards the three key principles to sustainable development: economic, social and environmental and comments on how the plan will contribute towards delivering sustainable development.

### **General conformity with the strategic policies**

- 2.13 The third basic condition is for the neighbourhood plan as a whole to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan comprises the 2011 Bassetlaw Core Strategy and Development Management Policies which were adopted on December 2011. The Council has started work on a new Bassetlaw Local Plan although this is at a very early stage with consultations on the Initial Draft Plan undertaken between October and December 2016.
- 2.14 Table 3 of the Basic Conditions Statement sets out an assessment of how the Neighbourhood Plan policies are in general conformity with the strategic policies of the 2011 Bassetlaw Core Strategy and Development Management Policies and the Initial Draft of the Bassetlaw Local Plan 2016. The Table explains how the Neighbourhood Plan policies have been developed to take account of the emerging policy approach towards planning for housing growth in clusters of villages and the introduction of a criteria based approach to assessing the suitability of sites in the villages with the removal of the development boundaries.
- 2.15 The examination of the Neighbourhood Plan will consider the policies against the adopted strategic policies of the Local Development Framework where these are relevant and up to date. Account will also be taken of the evidence that has been prepared for the emerging Local Plan particularly in the context of the housing requirement.
- 2.16 In section 3 of this Health Check Report, I have considered the Neighbourhood Plan policies in turn to assess whether they are in general conformity with the strategic policies of the adopted Development Plan.
- 2.17 I have also considered whether the Neighbourhood Plan would introduce policies and designations that may constitute blanket restrictions that may restrict future development in the area in the emerging Local Plan as advised in national planning policy. National advice is that where blanket restrictions

are proposed they should be justified by robust evidence to support any proposed designations.

### **EU obligations and human rights requirements**

- 2.18 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive, the Environmental Impact Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.19 Screening Assessments for SEA and HRA were undertaken by Bassetlaw District Council. Consultations carried out with the environmental bodies have raised no concerns in the responses. The Basic Conditions Statement includes a summary of the findings of the screening reports and the responses to the consultation with the environmental organisations. I have not seen the SEA/HRA Screening Reports which were consulted on in May 2017. It is suggested that they should be checked to ensure that no changes have been made to the revised Plan that would warrant a review of the Screening Reports.
- 2.20 The Basic Conditions Statement includes an assessment of the impact of the Plan on Human Rights.

**Recommendation 1: Check the SEA and HRA Screening Reports to ensure that no changes have been made to the revised Plan that would warrant a review of the Screening Reports.**

### **The Neighbourhood Plan Preparation**

- 2.21 The examination will check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.22 The Consultation Statement is a clear and comprehensive document that sets out a summary of the consultation process that has been undertaken in the course of preparing the Neighbourhood Plan. It summarises the various consultation stages, the methods used to consult the community, other stakeholders and statutory consultees. A summary of the key issues raised at each stage is included. Appendix tables set out the responses received to the Reg 14 consultation and note how the comments have been addressed in the preparation of the submission draft Plan.

### **Referendum Area**

- 2.23 At the examination stage, the Independent Examiner will make one of three possible recommendations:
- that the plan should proceed to referendum on the basis that it meets all the legal requirements;

- that the plan should proceed to referendum if modified; or
  - that the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
- 2.24 Were it to progress to Referendum and achieve more than 50% of votes in favour, then the Plan would be “made” by Bassetlaw District Council. The Neighbourhood Plan would then form part of the development plan and as such, would, together with the District-wide policies be used in determining planning applications and guide planning decisions in the Everton Neighbourhood Area.
- 2.25 The independent Examiner must consider whether the area for the referendum should extend beyond the neighbourhood area to which the Neighbourhood Plan relates, and if to be extended, the nature of that extension.
- 2.26 The communities in the parish are discrete and it is unlikely that the referendum area should be extended beyond the plan area.



### 3.0 The Neighbourhood Plan

#### Introductory Sections

- 3.1 The comments on the introductory section of the Plan are aimed at making it a clearer and more user friendly document.
- 3.2 The Neighbourhood Plan is well presented. The text is clearly set out and the Policies are set out in bold text in boxes so that they stand out from the supporting information. The maps use an OS base and are legible, showing the boundaries of sites clearly and include a key. Each is clearly numbered and titled. All sites referred to in the Policies should be included on the Policies Map. The use of photographs helps to make the interesting and locally distinctive.
- 3.3 The Plan includes an executive summary which provides a helpful overview of the plan. Section 1 of the plan sets out the purpose of the Neighbourhood Plan and national and local planning policy context.
- 3.4 The text in the introductory box states that “our Neighbourhood Plan will form part of Bassetlaw District Council’s planning policy for Everton Parish”. Whilst this is not incorrect, it is suggested that the text should more closely reflect the national guidance which states:

*“a neighbourhood plan forms part of the development plan and sits alongside the Local Plan prepared by the local planning authority. Decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations.”*

#### **Recommendation 2: revise the first paragraph of the text explaining the purpose of the Neighbourhood Plan to read:**

***“...our Neighbourhood Plan will form part of the **development plan for Bassetlaw alongside the Bassetlaw LDF / Local Plan. Decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations.**”***

- 3.5 Section 2 provides a clear and succinct overview of the process of preparing the Everton Neighbourhood Plan. Section 3 sets out a clear summary of the key planning issues that were identified. Issue 2 identifies the need to provide for the delivery of approximately 40 new houses during the plan period of 15 years. It is noted that paragraph 6.9 refers to the next 18 years. It is suggested that the references to the plan period should be checked and revised to 16 years. I comment further on the housing requirement later in this report.

#### **Recommendation 3: Revise the text and background documents to refer to the Plan period as 16 years.**

- 3.6 Section 4 sets out the Vision, aim and objectives for the Plan. The objectives are clearly explained and except for objective 5 are linked to the relevant

policies in the plan. It may be necessary to review this section should any policies be not included in the submission draft Plan.

- 3.7 Objective 5 which supports investment in local infrastructure refers only to Appendix VII. Section 9 of the Plan refers to investment in local infrastructure and acknowledges that this will be determined through the strategic policies and funded through Community Infrastructure Levy and other sources of funding. Appendix VII gives examples of the types of local infrastructure improvements that have been proposed through the consultation on the plan. However, Policies E13 and E14 also refer to improvements to community facilities and it is suggested that these policies could be cross referenced to Objective 5.

**Recommendation 4: Include reference to Policies E13 and E14 and Section 9 as well as Appendix VII under Objective 5.**

### **The Policies**

- 3.8 A number of the policies are fairly generic in their form of wording. As a general comment, neighbourhood plan policies should add locally distinctive details to the strategic policies. Policies that repeat strategic policies or add little to them are likely to be deleted by the examiner as unnecessary and superfluous.
- 3.9 The background text to each section includes much detail of local areas of interest. It is recommended that these should be reviewed and condensed to only include the material that is necessary to assist in justifying and interpreting the policies in that section. A background evidence report could be prepared with fuller details.

**Recommendation 5: review and condense the background text throughout the Policies section to only include the material that is necessary to assist in justifying and interpreting the policies in that section.**

### **Natural Environment**

#### **Policy E1 Protection of the Landscape**

- 3.10 The first and second parts of the policy adds no locally specific details to the strategic policies.
- 3.11 As presently worded, the section on Green Gaps in Policy E1 which seeks to “preserve” the green gaps between the villages could be considered to set out a blanket restriction on development in the plan area which is not supported by evidence to justify it and as such would be considered to be contrary to national planning policy. Reference to the area between Everton village and the boundary of the neighbourhood plan area effectively covers all the open land outside the village. The gaps between the other villages are not defined on the Policies Map. Drakeholes is outside the Plan area and the policy can only address land within the plan area.

- 3.12 The supporting text refers to the possibility of development in particular areas compromising view of the windmill, the woods and open countryside. There are no maps or photographs to demonstrate the location of the viewpoints or explain the significance of the views.
- 3.13 The PPG states that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.*” (Paragraph: 041 Reference ID: 41-041-20140306)
- 3.14 I consider that the Green Gaps policy in Policy E1 does not accord with national planning policy as it introduces blanket restriction on development that is not supported by evidence to justify it. Furthermore, the policy is not clearly and unambiguously worded so that it could be used with confidence when determining planning applications.
- 3.15 Development in the countryside is addressed in Core Strategy Policies DM1 – DM3. It is unclear what locally specific requirements are added by the policy on Green Gaps.

**Recommendation 6: Delete the first and third part of Policy 1 and the supporting text. The second part should only be retained if information on local historic boundaries is included in the plan and is supported by evidence.**

### **Policy E2 Type and Location of Development in the Countryside**

- 3.16 Core Strategy Policies DM1 – DM3 set out principles for considering the suitability of development proposals in the countryside. It is incorrect to say that they have to demonstrate that they are “necessary”. It would be preferable to refer to them as “acceptable”.
- 3.17 It is not clear how the term “avoid breaking the skyline” is to be interpreted as this will usually depend on the view point of the observer.

**Recommendation 7: In Policy E2 replace “necessary” with “acceptable”. Consider whether the term “avoid breaking the skyline” could be explained in the supporting text.**

### **Policy E3 Protecting and Enhancing Biodiversity**

- 3.18 The first part of the policy refers to proposals being permitted. The NPPF states that “*Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.*” A neighbourhood plan policy cannot stipulate that specific types of development proposals can be permitted.

- 3.19 The second part of the policy includes examples of how the policy could be applied. These should be included in the supporting text.
- 3.20 The third part of the policy states that when development proposals affecting biodiversity sites of national or local importance should be refused. The matter is addressed in national and strategic Policy DM9 and I consider that it adds nothing to these policies and should be deleted.
- 3.21 This is a generic policy which lacks locally specific details and adds nothing to the strategic Policy DM9. I would therefore recommend that it be deleted. The Plan could have been more helpful on this subject if it had identified local areas for biodiversity enhancement.

**Recommendation 8: Delete Policy E3.**

**Policy E4 Green Infrastructure**

- 3.22 This is a generic policy which adds no locally specific details to the strategic Policy DM9. The small scale development proposals of the plan are unlikely to include any landscaping schemes on a woodland scale. The policy would be more helpful if it identified any new routes or gaps in off road routes that are required.

**Policy E5 Archaeology**

- 3.23 This policy builds on Policy DM8 to identify local areas of archaeological interest and an appropriate policy response. The supporting information should describe the source for identifying these sites. The Basic Conditions Statement refers to them being recorded in the HER.

**Policy E6 Protecting the Conservation Area and its setting**

- 3.24 The strategic Policy DM8 relates to “heritage assets” in general terms. Policy E6 has sought to develop the themes to apply them to the Everton conservation area.

**Policy E7 Encouraging High Quality Design**

- 3.25 This policy seeks to identify locally specific design principles within the context of character areas. These are described as character zones in Appendix VIII (not VII as stated in the policy). The source of these character areas/ zones should be recorded in the justification and Appendix. The map should be numbered according to the zone number in the Appendix.

- 3.26 Point 3 of the policy refers to new buildings following a “consistent” design approach. It is not clear what it should be consistent with.

**Recommendation 9: In Policy E7 revise point 1 to refer to Appendix VIII.**

**Revise point 3 to remove the term “consistent” or delete the point.**

**Determine whether these are to be called character areas or character zones and revise the text and appendix accordingly. Include the zone reference numbers on Map 11.**

## Housing

### Identifying the Housing Requirement

- 3.27 It is important that the plan explains how it has arrived at the figure for the housing requirement. It is from this figure that the need to allocate new housing sites is justified. This can be difficult where the Core Strategy only provides figures for overall growth of a number of villages and the Local Plan is reviewing the status of villages. It would be helpful if the LPA provided guidance on an acceptable range for the growth rate for housing in each village rather than setting the 20% cap proposed as a backstop to prevent uncontrolled sprawl. The neighbourhood plan should not set a maximum figure for housing development in the village.
- 3.28 The reasoning in paragraphs 6.9 to 6.16 does not give a clear explanation of where the requirement for about 40 additional homes during the lifetime of the plan has been derived from. Paragraph 6.10 should be rewritten to explain how the figure has been arrived at. Is it based on an extrapolation of past trends or a percentage increase in the number of homes? The figure should be sufficient to provide for the range of housing types that is needed in the plan area, particularly affordable housing, but not too high to jeopardise the strategic policy of housing in rural service centres. Note - there appears to be some text missing at the end of paragraph 6.9.
- 3.29 The Basic Conditions Statement provides further information on the proposed change in approach to delivering housing in rural communities from the Core Strategy to the emerging Local Plan. The latter is proposing to rely on a criteria based policy to assess suitable sites for housing development rather than use a development boundary around the village. It is understandable for the Neighbourhood Plan to seek to follow a similar approach. As the Local Plan is at an early stage and could be revised before it is adopted, the Neighbourhood Plan cannot at this stage rely on the draft Local Plan policies and has therefore included criteria in Policy E8 to assess the suitability of potential housing sites.
- 3.30 The housing requirement figure should not be based on the response to the community questionnaire asking for views on the numbers. That should only

provide supporting information on the community's willingness to accept a particular level of development.

- 3.31 It is suggested that a short paper be prepared that sets out alternative approaches considered in developing the housing requirement figure to support and justify the figure chosen. Be careful to avoid the circuitous argument that 40 is the acceptable figure because that is deliverable through the proposed site allocations. Ensure that the justification in the Housing section of the Plan itself and the statements in the Basic Conditions Statement and other background documents on Site Assessment are consistently worded with the conclusions of the report on the Housing requirement.

**Recommendation 10: Revise paragraphs 6.9 to 6.16 to give a clear explanation of where the requirement for about or at least 40 homes (in addition to commitments) during the lifetime of the plan has been derived from. Particular attention should be paid to paragraph 6.10. Prepare a short background paper setting out the alternative approaches considered in developing the housing requirement figure.**

### Policy E8 Housing within Everton Parish

- 3.32 Once the housing requirement has been clarified, Policy E8 could be explicit about the housing requirement figure in terms of "*About / At least XX new homes should be provided in the plan area during the lifetime of the plan.*" The housing numbers to be provided through the commitments and allocations should be listed in a table in the Plan to demonstrate that the housing requirement is deliverable.
- 3.33 It is not clear how the character zones will help to identify whether a particular site is acceptable for housing development as they simply describe existing development styles.
- 3.34 Criterion 2 states that to be acceptable development sites should adjoin the built form of Everton village. It is evident from the sites assessment that there has been debate about the suitability of certain sites based on their proximity to the built form of the village. It is noted that there is some sporadic development to the south east of the village. Is it clear how the existing built form is to be defined in the absence of a development boundary as proposed in the emerging Local Plan? It is suggested that the justification to the policy should include some further advice on how this criterion is to be interpreted.
- 3.35 There are typographical errors in points 3 and 4. Point 5 refers to small to medium scale sites of 10 or fewer houses. It is suggested that if a maximum site size is prescribed then the term "small to medium scale" is unnecessary. On the other hand setting a maximum site size of 10 dwellings may be viewed as restrictive bearing in mind the size of the site allocations. Evidence should be provided to clearly justify this, for example, in terms of controlling the

growth of the village. I have set out a suggested form of wording for you to consider.

**Recommendation 11: revise Policy E8 to include the housing requirement for the Plan along the lines of: “At least XX new homes should be provided in the plan area during the lifetime of the plan through allocations under Policy E9, infill development (define) and small scale sites (10 or fewer dwellings) adjacent to the existing built form of Everton village.”**

**Revise point 3 to read “...suitable alternative provision *should be made*; and”**

**Revise point 4 to read “ ...is provided *and* linked to...”**

**Include an explanation to aid the interpretation of “adjoins the built form of the Everton village.” Define infill development. Provide an explanation of the reasons for restricting sites to 10 or fewer dwellings.**

### Site Allocations

- 3.36 As stated in paragraphs 3.30 above, the housing target should not be based on the response to the community questionnaire asking for views on the housing numbers. The evidence for setting the housing requirement should be set out in the introduction to the housing section, so this section on site allocations focuses on how the sites have been assessed and selected to deliver the housing requirement.
- 3.37 The Site Allocation and Assessment Report provides reasoned criteria for site assessment and a clear Summary of Assessment table. It could be improved with a description of each site (eg current use, trees, hedges, access, problems with drainage or flooding, proximity to edge of village and services; an estimate of the potential number of dwellings that could be accommodated etc.) The critical factors that have resulted in a site not being accepted could be highlighted eg distance from village. Be careful not to rely on anecdotal responses to the consultation, such as highway impact, unless this is backed up by evidence from the County Highways Section as this may be challenged by developers.
- 3.38 The Selection of Housing Sites Position Statement explains the process of assessing and selecting sites at each stage. The reasons for undertaking the second Reg 14 consultation and the responses to the various sites is clearly set out. The statement refers to a Technical Assessment undertaken by Bassetlaw DC. It is recommended that the evidence on Site Assessment is brought together into a single report. The Examiner will want to be sure that a set of criteria have been established to assess the sites and that the assessment has been carried out on a reasoned and consistent basis. The Plan makers should ensure that the proposed site allocations are deliverable within the timescales of the Plan.

- 3.39 Paragraph 6.38 refers to the final number of houses on each site taking account of the criteria in Policy E8 which calls for sites of 10 or fewer dwellings. This should be deleted in view of the proposed range of dwellings number given under each site allocation.
- 3.40 You may wish to consider the numbering of the potential sites on Map 12, some of which are referenced as BDC sites. They are all referenced as NP in the text of paragraph 6.24 and 6.27.

**Recommendation 12: Delete reference in paragraph 6.38 to the criterion in Policy E8 concerning sites of 10 or fewer houses.**

**Prepare a single report on the Sites Assessment.**

**Policy E9 Housing Site Allocations**

- 3.41 There is no need to refer to the other policies in the NP. The sites will be considered against relevant policies in the development plan as a whole and other material considerations. These are site allocations and the policy should state this; a suggested form of wording is proposed.

**Recommendation 13: revise Policy E9 to read: “The following sites shown on the Policies Map are allocated for housing development.”**

**Policy E10 House Types and Sizes**

- 3.42 Paragraph 6.40 includes an underlined paragraph on the lower affordable housing threshold. It may be helpful to include this under a sub-heading on affordable housing which sets out the local evidence of need for affordable housing and explains how it is to be met in the village over the plan period.
- 3.43 Policy E10 refers to contributions for affordable housing being sought for sites of more than 5 dwellings. However to accord with national and strategic local policy the policy should also state what affordable housing provision will be required on sites of more than 10 dwellings including the two larger allocations.
- 3.44 The first line of Policy E10 refers to “particular support” being given. There is no need for the word “particular” in policy wording.
- 3.45 Criteria 1 refers to sites near the centre of Everton village. The two larger allocations are not close to the centre of the village, so how will this criterion be applied?
- 3.46 The final paragraph of Policy E10 on Adaptation and Changing Needs refers to new housing being capable of being adapted over time. The standards for adaptable and accessible housing are set out in the national Housing Technical Standards. The Written Ministerial Statement of March 2015 states that “*neighbourhood plans should not be used to apply the new national technical standards*”. It is therefore recommended that the section be deleted.



**Recommendation 14: Delete “particular” from line 1 of Policy E10. Delete “particularly on sites near the centre of Everton village” from criterion 1. Revise the paragraph on affordable housing to refer to “developments of 6 – 10 dwellings”. Add in a sentence on the provision of affordable housing on sites of more than 10 dwellings to be in accordance with national and strategic local policy. Include evidence of affordable housing need in the justification. Delete the section on Adaptation and Changing Needs.**

### **Policy E12 Supporting Local Economic Growth and Rural Diversification**

**Recommendation 15: Consider deleting the second paragraph of Policy E12 which repeats part of the first paragraph.**

### **Policy E11 Sustainable Design and Tackling Fuel Poverty**

### **Policy E13 Supporting Investment in New Facilities**

### **Policy E14 Protecting Existing Recreational Facilities**

### **Policy E15 New or Extended Cemetery**

3.47 No comments on these policies

## 4.0 Background Documents

4.1 In undertaking this health check, I have considered the following documents

- Everton Neighbourhood Plan Draft Version Spring 2018
- Everton Neighbourhood Plan Basic Conditions Statement 8/2/2108
- Everton Neighbourhood Plan Consultation Statement 26/2/2018 and Tables 1-4
- Everton Housing Sites Position Statement 21/3/2108
- Everton Site Assessment Criteria 2017 and 2018
- National Planning Policy Framework March 2012
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Bassetlaw Core Strategy and Development Management Policies 2011

## 5.0 Summary of Recommendations

**Recommendation 1:** Check the SEA and HRA Screening Reports to ensure that no changes have been made to the revised Plan that would warrant a review of the Screening Reports.

**Recommendation 2:** revise the first paragraph of the text explaining the purpose of the Neighbourhood Plan to read:

*“...our Neighbourhood Plan will form part of the **development plan for Bassetlaw alongside the Bassetlaw LDF / Local Plan. Decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations.**”*

**Recommendation 3:** Revise the text and background documents to refer to the Plan period as 16 years.

**Recommendation 4:** Include reference to Policies E13 and E14 and Section 9 as well as Appendix VII under Objective 5.

**Recommendation 5:** review and condense the background text throughout the Policies section to only include the material that is necessary to assist in justifying and interpreting the policies in that section.

**Recommendation 6:** Delete the first and third part of Policy 1 and the supporting text. The second part should only be retained if information on local historic boundaries is included in the plan and is supported by evidence.

**Recommendation 7:** In Policy E2 replace “necessary” with “*acceptable*”. Consider whether the term “avoid breaking the skyline” could be explained in the supporting text.

**Recommendation 8:** Delete Policy E3.

**Recommendation 9:** In Policy E7 revise point 1 to refer to Appendix VIII.

Revise point 3 to remove the term “consistent” or delete the point.

Determine whether these are to be called character areas or character zones and revise the text and appendix accordingly. Include the zone reference numbers on Map 11.

**Recommendation 10:** Revise paragraphs 6.9 to 6.16 to give a clear explanation of where the requirement for about or at least 40 homes (in addition to commitments) during the lifetime of the plan has been derived from. Particular attention should be paid to paragraph 6.10. Prepare a short background paper setting out the alternative approaches considered in developing the housing requirement figure.

**Recommendation 11:** revise Policy E8 to include the housing requirement for the Plan along the lines of: *“At least XX new homes should be provided in the plan area during the lifetime of the plan through allocations under Policy E9, infill development (define) and small scale sites (10 or fewer dwellings) adjacent to the existing built form of Everton village.”*

Revise point 3 to read “...suitable alternative provision *should be made*; and”

Revise point 4 to read “...is provided *and* linked to...”

Include an explanation to aid the interpretation of “adjoins the built form of the Everton village.” Define infill development. Provide an explanation of the reasons for restricting sites to 10 or fewer dwellings.

**Recommendation 12:** Delete reference in paragraph 6.38 to the criterion in Policy E8 concerning sites of 10 or fewer houses.

Prepare a single report on the Sites Assessment.

**Recommendation 13:** revise Policy E9 to read: “The following sites shown on the Policies Map *are allocated for housing development.*”

**Recommendation 14:** Delete “particular” from line 1 of Policy E10. Delete “particularly on sites near the centre of Everton village” from criterion 1. Revise the paragraph on affordable housing to refer to “developments of 6 – 10 dwellings”. Add in a sentence on the provision of affordable housing on sites of more than 10 dwellings to be in accordance with national and strategic local policy. Include evidence of affordable housing need in the justification. Delete the section on Adaptation and Changing Needs.

**Recommendation 15:** Consider deleting the second paragraph of Policy E12 which repeats part of the first paragraph.