

LONDON BOROUGH OF RICHMOND UPON THAMES

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

HEARING 1: LEGAL COMPLIANCE, SPATIAL VISION AND STRATEGIC OBJECTIVES

TUESDAY 26 SEPTEMBER, MORNING

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Is the Plan legally compliant? Does the Plan contain a robust spatial vision and justified strategic objectives consistent with national policy and in general conformity with the London Plan?

Yes, the plan is legally compliant as set out within the Council's Legal Compliance Checklist (SD-011); also see the Council's responses within this Hearing statement below, which demonstrates that the Plan has been prepared in accordance with the legal and procedural requirements.

The Plan contains a robust spatial vision and justified strategic objectives. See the Council's responses to questions 9 and 10 within this Hearing statement below.

The Council considers the Plan to be consistent with national policy and in general conformity with the London Plan. See the Council's responses to questions 9 and 10 within this Hearing statement below.

1. Has the Plan been prepared in accordance with the statutory procedures of the 2004 Act (as amended) and the associated regulations¹, including in respect of the publication and availability of documents, advertisements and notification?

Yes, the Plan has been prepared fully in accordance with the statutory procedures and Regulations as set out by the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and in accordance with the National Planning Policy Framework.

The full details of compliance with the statutory procedures are set out within the Council's Legal Compliance Checklist (SD-011) and the Soundness Self-Assessment (SD-010). In addition, the Council's Statement of Consultation (Part I) (SD-004), covering the non-statutory scoping consultation and Regulation 18 consultation as well as the Council's Statement of Consultation (Part II) (SD-009) covering the Regulation 19 consultation, which together form the Regulation 22 statement, set out that all statutory procedures and regulations in relation to the publication and availability of documents, advertisements and notifications have been complied with.

No relevant body contends that the Duty to Co-operate has not been complied with. See the Council's Duty to Co-operate Statement (SD-012) and question 2 below.

¹ Particularly, The Town and Country Planning (Local Planning) (England) Regulations 2012

2. Does the Plan acknowledge adequately cross border issues, particularly with regard to the Duty to Cooperate on strategic matters?

Yes, section 2 of the Plan sets out the Strategic Context and Vision, which recognises the interrelationship with Greater London and the South East. The Spatial Strategy in section 3 of the Plan reinforces the borough's context as an outer London Borough. There is a common approach to planning across borough boundaries on many strategic issues, such as protecting the historic environment and providing employment land to meet future needs. The Plan's policies seek to meet a balance of needs within the borough.

Have there been timely, effective and conclusive discussions with key stakeholders and prescribed bodies on what the plan should contain?

In preparing the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring boroughs and other public bodies and key stakeholders on strategic issues.

The Duty to Co-operate Statement (SD-012) sets out the timely, effective and conclusive discussions with the prescribed bodies at each stage in the plan preparation, as considered relevant linked to the nature of the Plan review and highlighted during the Scoping Consultation. The Plan was subject to three stages of public consultation, and effective engagement and discussions with the prescribed bodies took place prior to and/or at these key stages and throughout the preparation of the Plan. Meetings and subsequently detailed conversations were held to discuss the full range of specific cross-boundary policy and strategic issues.

This demonstrates positive engagement through the Duty to Co-operate has resulted in regular exchanges of information, particularly sharing evidence base and updates to policy approaches, and informed the preparation of the Plan. The Statement also includes examples where responses from prescribed bodies have led to amendments to the Plan content.

It should be noted that although not relevant with regard to the Duty to Co-operate, the Council has taken a positive approach to produce Statements of Common Ground in advance of the hearing sessions with some of the prescribed bodies as well as other key stakeholders, namely Historic England, the Greater London Authority and Transport for London on behalf of the Mayor of London, the Port of London Authority and Sport England.

How does the Plan align with those of adjacent Boroughs?

The Council is bordered by four London Boroughs – Kingston, Hounslow, Wandsworth and Hammersmith & Fulham. For London Boroughs, planning for strategic matters is co-ordinated through the London Plan. This sets for example housing targets, the network of town centres and approach to the River Thames Policy Area. Therefore, the Plans are aligned through the approach to general conformity with the London Plan.

In addition, the Borough of Richmond upon Thames shares its boundaries with Elmbridge and Spelthorne Borough Councils. As set out in the Duty to Co-operate Statement (SD-012), the Mayor also collaborates across the Wider South East through the Strategic Spatial Planning Officer Liaison Group.

As referred to above, there is a common approach to planning across borough boundaries on many strategic issues. The Council's Spatial Strategy is considered to align with those of adjacent Boroughs, considering future needs including housing, employment and retail, while continuing to protect local character and maintain the borough's parks and open spaces which provide a green lung for southwest London.

In addition, meetings and/or detailed conversations were had with the neighbouring authorities throughout the preparation of the Plan, to ensure consistency and that the Plan aligns with neighbouring authorities, as set out within the Duty to Co-operate Statement (SD-012).

There are no large cross-boundary sites or outstanding strategic matters to be addressed in the Plan.

3. Has the production of the Plan followed the Local Development Scheme (is the LDS up to date in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011)?

A revised Local Development Scheme (LDS) (SD-014) was published by the Council in January 2017. This confirms that the submitted Plan, and that consulted upon at earlier stages of its preparation, including the Publication Local Plan (Regulation 19), are entirely consistent with the content and programme for production as outlined in the current LDS.

The LDS sets out the submission for Examination in May 2017, which has been followed in line with the LDS. Examination in Public is programmed for the period of June to October 2017, with the Inspector's report being anticipated between November 2017 to January 2018, followed by anticipated adoption (subject to the Inspector's findings) in spring 2018.

**4. Has the production of the Plan followed the Statement of Community Involvement?
Has the consultation on the submitted plan (and its changes) been adequate?**

Yes, the production of the Plan has followed the SCI (SD-019) at each stage of plan preparation. The consultation on the submitted Plan has met the relevant statutory requirements, as set out in the Council's Statements of Consultation (SD-009 and SD-004). The Scoping Consultation was an additional stage of consultation, not prescribed by legislation, to get input as early as possible from interested parties to inform the Plan. There were 311 respondents to the Regulation 19 consultation, on a range of issues and sites. The statutory requirements for notification of submission and the commencement of Hearings have also been undertaken (PS-001 and PS-044).

Overall, it is considered that consultation efforts have met and indeed exceeded those set out in the SCI.

In the event that the Inspector recommends any 'main modifications' arising from discussions during the Examination process, these will be subject to public consultation and Sustainability Appraisal, along with any additional minor modifications and/or technical changes, in line with national guidance and the Council's SCI.

5. Is the Equality Impact Assessment adequate and robust in terms of its methodology and conclusions?

The Council has complied with and fully discharged its Public Sector Equality Duty (PSED) in line with Section 149 of the Equality Act 2010, a duty that has to be satisfied in the discharge of all of the council's functions including plan making.

At both the Regulation 18 and the Regulation 19 stage, an Equalities Impact Assessment as well as a Health Impact Assessment were published to support the main consultation documents.

All policies and proposals, including the site allocations, were assessed within the Equalities Impact Assessments (EqIA). The EqIAs considered the impact of the Plan's policies on the protected characteristics groups as identified in the Equality Act 2010. See the Publication Local Plan Equalities Impact Assessment (SD-006) and the Pre-Publication Local Plan Equalities Impact Assessment (PS-047). The findings and conclusions of the final EqIA (SD-006) are set out within Section 5 of the report, and broken down by the protected characteristics and equalities groups.

In addition, although not a statutory duty, the Council has undertaken a Health Impact Assessment of the Local Plan in order to assess the health and wellbeing impacts (mental, physical and social) of the Plan. This identified health and wellbeing impacts that may arise from the Plan, and it suggested measures for mitigating negative outcomes and enhancing positive outcomes, which have informed the development of the Plan. This is relevant to assessing implications for an ageing population and certain disadvantaged population groups. See the Publication Local Plan Health Impact Assessment (SD-007) and the Pre-Publication Local Plan Health Impact Assessment (PS-048).

6. Has the Plan been prepared to be consistent with the National Planning Policy Framework (NPPF) and in general conformity with the London Plan? What review mechanisms are inbuilt?

Yes. The Plan is consistent with national policy in the National Planning Policy Framework (NPPF), with the 2004 Act (as amended) and 2012 Regulations. The Plan has been positively prepared using up to date and relevant evidence and is consistent with the objectives set out within the NPPF. The Council's Soundness Self-Assessment (SD-010) as well as the Legal Compliance Checklist (SD-011) provide confirmation in this regard. In addition, the Policy Background Paper (SD-008), which includes a detailed assessment against national policy and guidance, provides further confirmation that the Plan is consistent with the NPPF.

With particular regard to objectively assessed needs (OAN), it is noted that the NPPF requires OAN for housing (both market and affordable) as well as economic development (including main town centre uses).

The SHMA (SD-025) considers the Borough's objectively assessed need, considering various population / demographic projections, economic performance, affordable housing need and market signals. It also considers the size, type and tenure of housing required, and the needs of different groups including families with children, older people, people with disabilities, service families and people wishing to build their own home. Drawing together the evidence, it concluded that the minimum need for housing in the borough is for around 1,047 dwellings per annum in the period from 2014 to 2033. However, relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. In addition, the SHMA identifies a net deficit of 964 affordable homes per annum for the period from 2014 to 2033, demonstrating the need for affordable homes remains substantial. The latest Borough's Monitoring report for Housing 2016/17 (PS-045) set out that there are sufficient identified sites to exceed the borough's remaining housing target in the London Plan, also taking into account the 5% buffer.

Whilst the Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. In particular, due the nature of the borough, characterised by large swaths of protected parks and open spaces (many of which are protected by SSSI, MOL, Green Belt, Historic Parks and Gardens etc. designations) with the remaining areas being relatively dense low-medium rise centres, towns and villages (many of which are within Conservation Areas), the capacity for significant increases in housing supply and hence delivering the OAN for housing is very

limited. These are elaborated upon in the Plan approach set out in the Council's statement for Hearing 5. There are other land use needs, for economic growth as set out below and accompanying social infrastructure, set out in the Council's written statements for Hearing 2. Overall, there is therefore no conflict with the NPPF's paragraph 14.

In relation to OAN for economic development, detailed evidence is set out within the Borough's employment evidence (SD-034 and SD-035) as well as within the relevant London-wide research (PS-003 and PS-004). This sets out a need to meet a 120,000sq.m requirement for offices and just under 80,000sq.m of industrial floorspace. In reality, taking account of the limited land supply in the borough as well as the high values of land, it is unrealistic to assume that the Local Plan can meet these objectively assessed needs. However, the detailed analysis and studies support the justification for the employment policies set out in the Plan.

In relation to other town centre needs, the Council's Retail Study (SD-029) estimates that a modest increase in retail (including separate forecasts for A3/A4/A5) can be met; also see the Council's written statement to Hearing 6, Borough Centres.

With regard to review mechanisms, the Localism Act 2011 requires every authority to produce reports containing information on a number of topics including: (1) the implementation of the Local Development Scheme; (2) the progress and effectiveness of the Local Plan, and (3) the extent to which the planning policies set out in the Local Plan documents are being achieved.

The PPG states that LPAs must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to co-operate and shows how the implementation of policies in the Local Plan is progressing. The Council therefore regularly publishes monitoring reports on a series of topics, such as housing, retail and vacancy rates, employment etc. on its public website:

www.richmond.gov.uk/authority_monitoring_report.

Overall, the Authority's Monitoring Reports (AMRs) on the specific topics monitor the delivery of policies in the Local Plan once they have been adopted. The Council has produced a Monitoring Framework for the Local Plan (SD-013), which sets out the indicators that will be used to monitor the policies contained within the Local Plan. Table 2a identifies the relevant indicators and targets for the policies of the Local Plan. Therefore, through regular monitoring of the targets and indicators, the Council will be able to determine when there is a need to undertake a partial or full review of the Local Plan. In addition, the Council's housing trajectory (as set out in the latest Housing AMR 2016/17 (PS-045) enables the Council to

monitor the implementation of sites that provide the required number of homes in line with the London Plan target. Overall, the Plan does not rest on the delivery of any one particular development site or scheme, which helps to minimise the potential need for an early review of the Plan.

Is the Plan in general conformity with the London Plan?

The Council considers the Local Plan to be in ‘general conformity’ with the London Plan. The GLA have been invited to make representations throughout the preparation of this Plan and specific Duty to Co-operate engagement activities have taken place.

The Mayor of London’s response (dated 22 February 2017) to the Regulation 19 consultation states that whilst the Mayor supports many aspects of the Plan, he is of the opinion that there remain a couple of outstanding issues that need to be addressed before the Local Plan can be considered as being in conformity with the London Plan. These issues relate to St Mary’s University (SA 8) and the local parking standards (LP 45). See the Council’s Soundness Self-Assessment (SD-010), the Legal Compliance Checklist (SD-011) as well as Council’s response to the Inspector’s Procedural Letter ID-4 (LBR-LP-005).

Since the submission of the Local Plan, the Council has worked constructively and positively with the Mayor of London to address these issues, and Statements of Common Ground have been prepared – see LBR-LP-009. Also see the Council’s written statements for Hearing 4 (question 5 on SA 8) and Hearing 7 (question 3 on LP45). Overall, the Council considers that, with the modifications proposed within the agreed Statements of Common Ground, the Plan is in general conformity with the London Plan.

7. Has adequate consideration been given to the Habitats Regulations? Will the implementation of the Plan, alone or in combination, affect adversely any Natura 2000 sites? Is Natural England satisfied with the content of the Plan, particularly with regard to potential effects on Richmond Park SAC?

Yes. The Council has given adequate consideration to the Habitat Regulations and it is considered that that the Local Plan is unlikely to have any significant effects on any Natura 2000 sites, either alone or in combination with other plans or projects.

A Habitats Regulation Assessment (HRA) (SD-005) was undertaken in accordance with available guidance and based on a precautionary approach as required under the Habitats Regulations. The findings of the screening stage have been explained in detail in Chapter 4 of the HRA report. The majority of the potential impacts associated with development were able to be screened out at this stage; with the exception of air pollution. Policies within the Local Plan, which will result in new development, may contribute to an increase in traffic and therefore air pollution, either alone or in combination with development in neighbouring boroughs. The HRA concludes that the Plan is not expected to result in adverse significant effects on the integrity of any European sites in relation to increased air pollution from vehicle traffic.

Natural England made representations to the Local Plan as part of the Regulation 18 and 19 consultations and are satisfied with its contents; in particular they have not expressed any concern with regard to potential effects on the Richmond Park SAC. Their response to the Regulation 19 consultation confirmed that there are no issues to highlight regarding the four tests of soundness, and therefore Natural England would not be attending or wanting to speak at the examination. In addition, a summary of engagement with Natural England and their response on the HRA can be found within Appendix 4 of the HRA report.

8. Does the Plan contain a positively prepared, clear and justified vision for the Borough? How have reasonable alternatives been considered and discounted? Is the spatial vision justified and robust with due regard to inclusive design?

The Plan's Strategic Vision, which describes what the borough will be like in 2033, is set out within section 2.2 of the Plan. It has 3 inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. These three themes provide the golden thread that runs through the Plan, and they have been taken forward from the Core Strategy's vision and spatial strategy. The Plan and its Strategic Vision have been informed by and are set within the strategic context of the borough, and links to the vision and themes as set out in the Community Plan (2016-2020) (PS-049) and Corporate Plan (2016-2019) (PS-050). The vision and the Plan's policies have been agreed corporately. In addition, they have been publicly consulted upon and take account of representations received, therefore representing a plan for the borough's local communities.

In this context, it should be noted that Richmond Council's Cabinet at its [meeting on 2 July 2015](#) agreed that a review of the existing policies contained within the Core Strategy (SD-015) and Development Management Plan (SD-016) should be undertaken, particularly in light of the Government changes that have occurred since their adoption, most notably the publication of the NPPF. Therefore, the vision, objectives and spatial strategy of the Plan have been largely informed by the existing adopted Plans (i.e. SD-015 and SD-016). The broad approach to the spatial strategy and to protect the historic environment and open spaces remained relevant. The vision, objectives and spatial strategy have been reviewed and updated as required to take account of the borough's local needs and changes in circumstances as well as the wider policy context. The vision has therefore been positively prepared, is sufficient clear and is justified.

The policies as set out in the Plan follow logically from the Vision as well as the Objectives (section 2.3), and the vision flows from the wider strategic context, including the Community Plan. The objectives of the Plan, which are considered to deliver the vision, were tested against the sustainability framework to ascertain how compatible the aims for the borough are with the principles of sustainable development. The results of this appraisal are shown in section 5.3 of the Pre-publication Local Plan Sustainability Appraisal (PS-008). This demonstrates that the Local Plan's objectives are generally positively compatible with the Sustainability Appraisal objectives.

The Council considers that inclusive design features adequately within the spatial vision. In particular, under the theme of 'Meeting People's Needs' and sub-theme of 'Facilities to meet needs', the vision clearly states that residents will continue to enjoy the strong sense of

community and inclusiveness as well as social interaction and cohesion. This will be delivered by objective 13 under 'Meeting People's Needs', which promotes inclusive and sustainable communities, social interaction, cohesive, healthy and dementia-friendly communities. The Spatial Strategy (Section 3) takes this further and sets out the importance of creating more inclusive and sustainable communities (see paragraph 3.1.22) and ensuring that environments and public realm are inclusive and accessible (see paragraph 3.1.25). The policies that are considered to deliver 'inclusive design' are LP 1 (criterion 5), LP 18 (in relation to access to the River Thames), LP 25 (in relation to the importance of local centres creating and fostering inclusiveness), LP 28 B (criterion 2), policy LP 30 (in relation to creating environments and a public realm that is inclusive and accessible for all), LP 31 (in relation to Public Open Space and access to it), LP 35 (in relation to inclusive access and standards), LP 37 (in relation to housing needs of different groups), as well as LP 44 (in relation to walking, cycling and public transport).

9. How have the Strategic Objectives been derived, are these adequate and linked to specific policy provision? Are the Strategic Objectives, as worded, consistent with subsequent policy provision, eg meeting peoples' housing needs? Is inclusive design referenced adequately?

Section 2.3 of the Plan sets out the strategic objectives for the Plan, and they outline what will need to be achieved to deliver the Plan's strategic vision. The objectives also set out how the key sustainability issues facing the borough, as identified in the Sustainability Appraisal and its Scoping Report, are addressed.

The objectives of the Plan were tested against the sustainability framework to ascertain how compatible the aims for the borough are with the principles of sustainable development. The results of this appraisal are shown in section 5.3 of the Pre-publication Local Plan Sustainability Appraisal (PS-008). This demonstrates that the Plan's objectives are generally positively compatible with the Sustainability Appraisal objectives.

The Plan's policies follow logically from the objectives and spatial strategy, and they follow the structure of the 3 inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. They are considered to be consistent with the subsequent Spatial Strategy (Section 3) and the policies, and have been subject to public consultation. The Council considers that there are no policy gaps and each objective can be clearly linked to a relevant policy in the plan, including those in relation to meeting people's needs. The Plan's Spatial Strategy sets out how the objectives will be met, for example the SHMA (SD-025) considered and assessed local housing needs and has informed the Plan's housing policies. Whilst it is recognised that the OAN on housing cannot be met (see above), the Plan contains strong policies on housing and sets out that the Council will pursue all opportunities to maximise the provision of housing, particularly affordable housing, through a range of measures.

See response to question 8 above regarding 'inclusive design'.

10. To what extent, and through which iterations, has the Sustainability Appraisal (SA) informed the content of the submitted Plan²?

Is the Council satisfied that the SA adequately summarises or repeats the reasons that were given for rejecting the alternatives at the time when they were ruled out (and that those reasons are still valid)?

The Council can confirm that the Plan has been subject to, and informed by, the process of Sustainability Appraisal (SA), as evidenced by the SA Report (SD-003), which contains a Non-Technical Summary (section 1).

SA is an iterative part of the plan making process. SA was carried out simultaneously alongside the preparation of the Plan and informed the consideration of alternatives and options, as well as making decisions on the final policy direction. Reasonable alternatives have been considered in relation to the policies and site allocations and the SA process has been instrumental in assessing the options available, both in terms of policy development as well as site selection and site assessment.

The Council's response to the Inspector's Procedural Letter ID-4 (LBR-LP-005) sets out further information, including the consideration of realistic and reasonable alternatives. In addition, the letter and its Appendix A provide detailed information on the previous SA iterations that led to the formulation of the submitted Plan.

The SA adequately summarises the reasons as to why alternatives or options were rejected at the time of the assessment, and those reasons are still valid. For further details see the SA Report of the Pre-Publication Plan (PS-008) and the SA progress reports for the site allocations (PS-011, PS-013 and PS-015). Also note Appendix 1 within the Council's Statements for Hearing 4 and Hearing 8 on Site Allocations.

There will be further opportunity for discussions at the various Hearing sessions in terms of how SA options and reasonable alternatives have informed particular policies and proposals.

² Discussion upon alternative approaches to specific policy content will be undertaken at subsequent and relevant hearing sessions as necessary.

11. Are issues of development viability recognised adequately by the Plan and its evidence base? Has a final viability assessment been undertaken for the content of the Plan as a whole which supports the deliverability of the plan objectives in a manner consistent with national policy?

The Council considers the Plan recognises that viability information will be taken into account through the implementation of Policies and Site Allocations, and as set out section 13.4 'Ensuring viability and deliverability'.

This is in accordance with the NPPF paragraph 173, that to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

The draft Whole Plan Viability Assessment (SD-024) considered the cumulative assessment of all of the Publication Plan policies, proposals and requirements. It is recognised that certain policies have a more direct bearing on financial viability, including affordable housing and sustainability policies. The viability outcomes for the residential sites indicated that the Council's policies should not have an adverse impact upon the viability of residential sites. With regard to the residential scenarios, it concluded that the cumulative impact of the Plan policies should not put at risk the viability of development, as envisaged by the site allocations (to assist with delivery of the Spatial Strategy). With regard to non-residential sites, it concludes that most retail uses and main centre offices will be viable, but that local retail and other employment uses could experience viability difficulties. It suggests improvements in occupier and investor demand, together with a reduction in the cost of development, are more critical to viability than any potential impact from the proposed policy changes.

The Whole Plan Viability Assessment was purposefully published as a draft and Publication responses have been considered by Adams Integra. The Addendum (PS-046) to the draft provides further evidence on the impact of a requirement for 50% affordable housing. This shows similar patterns of viability between 40% and 50% affordable, with the main viability pressure arising in the lowest value locations with the highest threshold values. This is considered to establish the final position, and supports the deliverability of the plan objectives. The draft report and Addendum constitute the Council's final Whole Plan Viability position. Viability will also be considered under the Inspector's questions in other Hearings.

12. Should the Plan contain a more fulsome and inclusive reference to the role of Neighbourhood Planning? Is the submitted Plan in line with national policy in this regard?

Neighbourhood planning is an important part of the national planning framework, and the Plan appropriately recognises and references this (see paragraphs 1.1.4, 2.1.13, 3.1.4, 8.1.2 and 8.1.6 as well as site allocations SA 15, SA 16, and SA 17). The Council does not wish to repeat national guidance and it is considered that the existing references, together with the Local Plan's glossary, are sufficiently fulsome and inclusive, and overall are in line with national policy.

The emerging Ham and Petersham Neighbourhood Plan is therefore clearly identified and afforded the appropriate weighting within the borough's planning processes.

Notwithstanding, the Council proposes the following minor amendments, for clarification, as follows:

- Paragraph 1.1.4 (last sentence): "The Council will ensure that planning applications that accord with the policies in the adopted Local Plan and the London Plan (and where relevant, with policies in **emerging neighbourhood plans, such as** the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise."
- LP 1: "All proposals, including extensions, alterations and shop fronts, will be assessed against **the policies contained within a neighbourhood plan where applicable, and the** advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design."

13. How are the changes to the policies map³ intended to be collated and shown within the Plan? Are the changes proposed to the map currently sufficiently clear and comprehensive?

Note that references in the Plan and the Council's Hearing statements to the 'Proposals Map' constitute the 'Policies Map'. This illustrates geographically the application of policies in the Plan in accordance with the PPG. References throughout the Plan to the Proposals Map could be updated to refer to the Policies Map (formerly known as the Proposals Map) as part of minor changes.

Changes to the currently adopted 2015 Local Plan Proposals Map (SD-020) have been collated and set out within the Proposals Map Changes document (SD-002). The changes are considered to be clear and comprehensive, and have been subject to public consultation at the Regulation 19 stage.

SD-002 provides a schedule of all changes to the Proposals Map, including a description of the change and whether it is an amendment, addition or deletion to the map. The document contains supporting maps and figures, which clearly indicate the change proposed. Subject to the outcome of this independent examination in public into the Plan, the existing 2015 Proposals Map will be amended with the changes set out in SD-002. In addition, all the site allocations set out within the Plan (SA 1 to SA 28) will be shown on the Proposals Map.

Furthermore, it should be noted that the Proposals Map does not contain the Archaeological Priority Areas (APAs). These are currently under review and should the revised APAs be confirmed prior to the adoption of the Plan, the APAs could either be included within the Proposals Map, or a separate / stand-alone map could be incorporated alongside LP 7. See the Statement of Common Ground with Historic England (LBR-LP-007) for further information.

³ To be discussed at Hearing 7 further.