



Milborne St Andrew Neighbourhood Plan 2018 to 2033

A report to Dorset Council¹

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Independent Examiner**

13 May 2019

¹ On 1 April 2019 the county's nine councils were replaced by two new organisations, Dorset Council and Bournemouth, Christchurch and Poole Council. This report was prepared largely on the basis of the submitted documents and the Regulation 16 responses and therefore refers to the Council as "North Dorset District Council" in most places.

Executive Summary

I was appointed by North Dorset District Council on 15 March 2019, with the agreement of Milborne St Andrew Parish Council, to carry out the independent examination of the Milborne St Andrew Neighbourhood Plan.

The examination was completed solely on the basis of the written representations received, no public hearing appearing to me to have been necessary. I made an unaccompanied visit to the area covered by the Plan on 9 April 2019.

Milborne St Andrew is a rural parish in North Dorset, lying between Dorchester and Blandford Forum. The Parish Council decided to commission the preparation of a neighbourhood plan in February 2014, and it was formally submitted to the then North Dorset District Council in October 2018. The Local Plan for the area designates Milborne St Andrew as a “larger village” which will be expected to deliver sufficient new dwellings to meet identified local and essential rural needs. Taking into account existing commitments and recently-built dwellings, the plan concludes that at least 32 dwellings need to be provided in the village over the period 2018-2033, and sufficient land for this is identified through the plan process. Both the “target” figure and the specific allocation are questioned by some of the representations received, and my conclusions on these challenges are dealt with in the body of my report.

While seeking to ensure that an appropriate amount of land to meet both housing and employment needs is identified, the Neighbourhood Plan is clear that its primary objective is that “...local people continue to be able to afford to live here, to work and socialise in the village, and that it remains the safe and attractive rural village that it has always been”.

Subject to a number of recommendations (principally for changes to the detailed wording of some policies), I have concluded that the Milborne St Andrew Neighbourhood Plan meets all the necessary legal requirements at this stage of its preparation, and consequently am pleased to recommend that it should proceed to referendum.

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Introduction

1. This report sets out the findings of my examination of the Milborne St Andrew Neighbourhood Plan (the MSANP), submitted to North Dorset District Council (NDDC) by Milborne St Andrew Parish Council in October 2018. The Neighbourhood Area for these purposes is the same as the Parish boundary.
2. Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to help local communities shape the development and growth of their area, and the intention was given added weight in the National Planning Policy Framework (NPPF), first published in 2012 but revised in July 2018 and February 2019, which continues to be the principal element of national planning policy. Detailed advice is provided by national Planning Practice Guidance (PPG) on neighbourhood planning, first published in March 2014.
3. The main purpose of the independent examination is to assess whether or not the Plan satisfies certain “basic conditions” which must be met before it can proceed to a local referendum, and also whether it is generally legally compliant. In considering the content of the Plan, recommendations may be made concerning changes both to policies and any supporting text.
4. In the present case, my examination concludes with a recommendation that, subject to certain detailed recommendations, the Plan should proceed to referendum. If this results in a positive outcome, the MSANP would ultimately become a part of the statutory development plan, and thus a key consideration in the determination of planning applications relating to land lying within the NP area.
5. I am independent of the Parish Council and do not have any interest in any land that may be affected by the Plan. I have the necessary qualifications and experience to carry out the examination, having had 30 years’ experience as a local authority planner (including as Acting Director of Planning and Environmental Health for the City of Manchester), followed by over 20 years’ experience providing training in planning to both elected representatives and officers, for most of that time also working as a Planning Inspector. My appointment has been facilitated by the Independent Examination Service provided by Trevor Roberts Associates.

Procedural matters

6. I am required to recommend that the Milborne St Andrew Neighbourhood Plan either:
 - be submitted to a local referendum; or
 - that it should proceed to referendum, but as modified in the light of my recommendations; or
 - that it not be permitted to proceed to referendum, on the grounds that it does not meet the requirements referred to in paragraph 3 above.
7. In carrying out my assessment, I have had regard to the following principal documents:
 - the submitted MSANP
 - the pre-submission version of the MSANP
 - the MSANP Consultation Statement (October 2018)
 - the MSANP Basic Conditions Statement (October 2018)
 - the MSANP Strategic Environmental Assessment Determination Statement (June 2017)
 - the MSANP SEA Report (October 2018) prepared by Dorset Planning Consultant Ltd

- the Habitats Regulations Assessment (April 2019) prepared by Dorset Council
 - the representations made to the MSANP under Regulation 16 (and, where appropriate, under Regulation 14)
 - selected policies of the adopted Local Plan for North Dorset
 - relevant paragraphs of the National Planning Policy Framework
 - relevant paragraphs of the national Planning Policy Guidance.
8. I carried out an unaccompanied visit to the Plan area on 9 April 2019, when I looked at the overall character and appearance of the Parish, together with its setting in the wider landscape, those areas affected by specific policies in the Plan, and the locations referred to by objectors. I refer to my visit as appropriate elsewhere in this report.
9. It is expected that the examination of a draft neighbourhood plan will not include a public hearing, and that the examiner should reach a view by considering written representations². In the present case, I considered hearing sessions to be unnecessary, as the consultation responses clearly articulated the objections to (and some support for) the Plan and presented arguments for and against its suitability to proceed to a referendum. I should add that none of the representations received at the Regulation 16 stage included a request for a hearing.

A brief picture of the Neighbourhood Plan area

10. Milborne St Andrew is a village in North Dorset straddling the A354, roughly half-way between Dorchester and Blandford Forum. It lies within attractive, undulating countryside, with the main part of the village lying on lower land forming the shallow valley of the Bere stream; this bisects the village as it runs from north to south to join the River Piddle. The visual character of the built-up area is very varied, with many older dwellings in the vicinity of the church (such as along Chapel Street), contrasting with an expanse of post-war housing on rising land to the west of Milton Road, the northern elements of which (eg Huntley Down) showing more affinity to the local vernacular than the area to the south (such as at Hopsfield). Ribbon development and some infill characterises Homefield to the south-east of the main part of the village; and there is an unusual detached group of two and a half storey semi-detached houses (The Rings), off Blandford Hill to the east of the Milborne Business Centre.
11. The present population of the parish (2011 Census) is given as 1062, living in 453 homes. The adopted North Dorset Local Plan designates Milborne St Andrew as one of 18 larger and more sustainable villages, which are expected to make a contribution towards meeting identified local and essential rural needs. The Local Plan does not specify how many new homes need to be built in the Parish, but the MSANP concludes that land for at least 32 dwellings (above existing commitments) needs to be identified over the period 2018-2033. A particular issue arising from the consultation exercises is the need to provide more lower-cost and smaller houses for local residents (including an element of starter-homes).
12. At the present time, in addition to the church, the village supports a small general store, post office, primary school, pre-school and a pub. In addition, there is a village hall and a range of outdoor recreation facilities. There is also a small branch surgery, with limited opening hours. A notable characteristic of the village is the network of public rights of way (including bridleways) which criss-cross the area, providing links into the surrounding countryside.

² Paragraph 9(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

The basic conditions

13. I am not required to come to a view about the ‘soundness’ of the plan (in the way which applies to the examination of local plans); instead I must principally address whether or not it is appropriate to make it, having regard to certain “basic conditions”, as listed at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The requirements are also set out in paragraph 065³ of the Planning Practice Guidance. I deal with each of these conditions below in the context of the MSANP’s policies but, in brief, all neighbourhood plans must:
- have regard to national policy and guidance (Condition a);
 - contribute to the achievement of sustainable development (Condition d);
 - be in general conformity with the strategic policies in the development plan for the local area (Condition e);
 - not breach, and otherwise be compatible with, EU obligations, including human rights requirements (Condition f);
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017
 - comply with any other prescribed matters.
14. The Basic Conditions Statement⁴ (BCS), prepared by Dorset Planning Consultant Ltd on behalf of the Parish Council, is dated October 2018. After summarising the relevant statutory requirements, it takes each section and policy of the MSANP and assesses its relationship with the national and local planning context, adding appropriate comments on general conformity. I have regard to specific elements of this document as necessary when considering the detailed provisions of the Plan.

Other statutory requirements

15. A number of other statutory requirements apply to the preparation of neighbourhood plans, all of which I consider have been met in this case. These are:
- that the Parish Council is the appropriate qualifying body (Localism Act 2011) able to lead preparation of a neighbourhood plan;
 - that what has been prepared is a Neighbourhood Development Plan, as formally defined by the Localism Act; that the plan area does not relate to more than one Neighbourhood Area; and that there are no other neighbourhood plans in place within the area covered by the plan;
 - that the plan period must be stated (which in the case of Milborne St Andrew is 2018 to 2033); and
 - that no “excluded development” is involved (this primarily relates to development involving minerals and waste and nationally-significant infrastructure projects).
16. I have also borne in mind the particular duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of “preserving or enhancing the character or appearance” of any conservation area.

³ Reference ID: 41-065-20140306

⁴ The title of the document is actually “Basic Conditions Report”, but I have adopted the more usual description

17. A screening report is required in order to determine whether a neighbourhood plan needs to be accompanied by a **Strategic Environmental Assessment (SEA)**, under the terms of the Environmental Assessment of Plans and Programmes Regulations 2004. It is the qualifying body's responsibility to undertake any necessary environmental assessments, but it is the Local Planning Authority's responsibility to engage with the statutory consultees.
18. A Strategic Environmental Assessment Screening Report for the MSANP was submitted to NDDC in April 2017 and subsequently made available to the statutory consultation bodies. As a result of the responses received, NDDC concluded that an SEA was required for the following reasons:
 - the Plan was likely to allocate land for 45-60 dwellings; and
 - the Plan area includes a large number of heritage assets.
19. The results of the subsequent SEA, carried out by Dorset Planning Consultant Ltd on behalf of the Parish Council, are contained in a report dated October 2018. This sets out the background to, and scope of, the assessment, and focuses on the likely effects of the MSANP on the environment, including an evaluation of "reasonable alternatives" (based on the call for sites exercise carried out in early 2016). For this, each candidate for land allocation was scored against eight SEA objectives; the impact of each of the Plan policies was assessed in the same way. The consultants concluded that there are no likely significant adverse impacts arising from the Plan.
20. The requirement to assess the impact of the Plan on any European site first involves the carrying out of a Habitats Regulations Assessment screening exercise by the competent authority (originally NDDC), based on information provided by the Parish Council⁵. This demonstrated that, due to possible impacts on important areas outside the MSANP area (Poole Harbour and the Dorset Heathlands), a more detailed assessment was needed. The relevant HRA report (published by the successor authority to NDDC, Dorset Council) is dated April 2019. Three of its conclusions make the same point, and it is convenient for me to deal with them here: ***I recommend that Policies MSA1, MSA3 and MSA5 include reference to the need for new development to adhere to the Nitrogen Reduction in Poole Harbour Supplementary Planning Document and to the Dorset Heathlands Planning Framework SPD, as appropriate.***
21. It is a requirement under the Planning Acts that policies in neighbourhood plans must relate to "the development and use of land", whether within the Plan area as a whole or in some specified part(s) of it. I am satisfied that that requirement is met.

National policy

22. National policy is set out primarily in the National Planning Policy Framework (NPPF)⁶, a key theme being the need to achieve sustainable development. The NPPF is supported by Planning Practice Guidance (PPG), an online resource which is continually updated by

⁵ This is contained in a report prepared by AECOM dated 27 March 2019.

⁶ My examination has taken place after the introduction of the current version of the National Planning Policy Framework, which was published in February 2019. However, paragraph 214 of the new NPPF makes it clear that the policies in the first version of the Framework (March 2012) apply for the purpose of examining plans submitted on or before 24 January 2019, which is the case here. All references in this report to NPPF paragraph numbers therefore relate to the *original* (2012) version.

Government. I have borne particularly in mind the advice in the PPG that a policy in a neighbourhood plan should be clear and unambiguous, concise, precise and supported by appropriate evidence⁷.

The existing Development Plan for the area

23. The current development plan for the area includes the North Dorset Local Plan (NDLP) Part 1 (adopted January 2016), together with a number of policies “saved” from the North Dorset District-Wide Local Plan 2003. For convenience, throughout my report I will refer to these simply as parts of the (adopted) Local Plan.
24. NDDC embarked upon a review of the local planning framework soon after adoption of the NDLP, and published an “Issues and Options” document on which consultation ended on 22 January 2018. Basic Condition (e) requires neighbourhood plans to be “in general conformity with the strategic policies of the development plan for the area”: this clearly means the *adopted* development plan. However, I bear in mind the advice at paragraph 009⁸ of the PPG, which says: “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan, the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.”

The consultation exercise (Regulation 14)

25. This regulation requires the Parish Council to publicise details of their proposals “in a way that is likely to bring [them] to the attention of people who live, work or carry on business in the area”, and to provide details of how representations about them could be made. Regulation 15 requires the submission to the Local Planning Authority of a statement setting out the details of what was done in this respect, and how the qualifying body responded to any matters which arose as a result of the consultation process.
26. The Consultation Statement (described as a summary, but containing a detailed account of the way stakeholders, including local commercial interests and landowners, were involved in the preparation of the Plan) is dated October 2018. It explains the various methods used to keep people involved and informed during the various phases of plan preparation; sets out the means employed to gather relevant information and opinion (for which the Parish Council obtained the assistance of an independent consultancy); and summarises the levels of response and key issues raised at the “options” stage of the process and subsequently at the pre-submission stage. There is an easily-accessed summary of the results of the consultation processes and the Working Group’s responses.
27. I am more than satisfied, having read the Consultation Statement and noted its various appendices, that the requirements of Regulation 14 have been fully met by the Neighbourhood Plan Group’s activities.

⁷ Paragraph 041 Reference ID 41-041-20140306

⁸ Paragraph 009 Reference ID: 41-009-20160211

General observations about the Plan

28. The following comments may be helpful in understanding the way I have approached my report on the Plan and the observations and recommendations which I make upon it:
- the Plan Working Group have spent considerable time and energy, in full consultation with the local community at large, in identifying the issues and objectives that they wish to include in the Plan, and this entirely reflects the aims of the “localism” agenda;
 - the recommendations I make concentrate on the policies themselves, since that is what the basic conditions relate to;
 - the Plan properly focuses on land use policies, reflecting Planning Practice Guidance;
 - I have addressed the policies broadly in the order that they appear in the submitted plan. I have set out my views about each of the policies, irrespective of whether or not any modification is thought necessary;
 - my recommendations for changes to the policies and any associated or free-standing changes to the text of the Plan are highlighted in ***bold italic print***.
29. The Plan document opens with a double-page Policies Map⁹ before explaining in plain English the purpose of the Plan, setting its preparation firmly within the context of the adopted North Dorset Local Plan. It summarises the way the Plan was prepared; refers to the desirability of keeping it under review (paragraphs 1.13 to 1.15); sets out the key social, demographic and economic statistics which have informed the approach to policy-making; and introduces the reader to Milborne St Andrew’s historic assets, as well as to the important issue of flood risk.
30. Section 3 of the Plan sets out the guiding vision and objectives which underpin it. The concisely-expressed vision is that “...local people continue to be able to afford to live here, to work and socialise in the village, and that it remains the safe and attractive rural village that it has always been”. It is worth noting here that one of the four stated objectives (“to support a working, active village”) acknowledges the fact that the village is expected to grow during the Plan period.
31. The introduction to Section 4 (“Supporting a working, active village”) provides the context to the first six policies, dealing with housing, employment and community needs. The remaining three sections deal with promoting a walkable village and minimising potential traffic problems; reinforcing local character and creating attractive places to live; and minimising flood risk. A small number of proposed projects (as opposed to strictly land-use policies) are found in the body of the Plan; and there are two appendices, one containing a list of the supporting documents used as part of the evidence base, and the other a draft traffic management concept for tackling some of the problems associated with the A354, which bisects the main part of the village from east to west.
32. Overall, the Plan document is attractively set out, with generous use of plans, photographs and tables to break up the text. The policies themselves are clearly differentiated from the

⁹ I have noted that NDDC have suggested different ways of displaying this information, but am content for this to be considered by the Parish Council without further comment from me.

supporting or contextual material by being printed in a different colour. These features, together with its commendable use of “no-nonsense” plain English (and even a few wry observations), make the Plan very user-friendly and easy to navigate.

33. The contents page of the Plan lists the pages on which each of the subject headings is to be found – the document itself, however, is not paginated ***and I recommend that that small improvement be made.***

Representations received (Regulation 16)

34. 11 representations were made in response to the submitted Plan. Four of these were from national bodies who raised no objections (Highways England, Natural England, Historic England and Sport England); Dorset County Council had some minor comments to make about the flood risk issues; and I will deal with NDDC’s observations in the body of the report. SGN (gas suppliers) had no comments. Significant objections to the Plan have been made on behalf of Wessex Strategic Ltd and Wyatt Homes (each of whom have a local land interest), and Mrs Nicola Pye (a local home-owner and land-owner). A supporting representation has been made on behalf of Bracken Developments Ltd. The strategic issues raised by or on behalf of the developer interests are addressed in the following section of my report, with more detailed matters being addressed under the appropriate policy headings.

The Neighbourhood Plan’s approach to determining housing need

35. Policy 2 of Part 1 of the adopted North Dorset Local Plan is the core spatial strategy for the District. In summary, it identifies the area’s four main towns as the principal focus of future growth, with Stalbridge and 18 “larger villages” (of which Milborne St Andrew is one) meeting local needs. Outside these identified settlements, the remainder of the District will be subject to countryside policies where development will be strictly controlled, unless it is required to enable essential rural needs to be met.
36. Local Plan Policy 6 describes the overall housing requirements for North Dorset during the Plan period (2011-2031), reiterating that the vast majority of the growth will be in the four main towns and allocating broad minimum housing numbers to each. Elsewhere, *“the level of housing and affordable housing provision will be the cumulative number of new homes delivered to contribute towards meeting identified local and essential rural needs. At least 825 dwellings will be provided in the countryside (including Stalbridge and the villages) during the period 2011 – 2031”*.
37. Settlements such as Milborne St Andrew therefore do not have specific “targets” for identifying land (either for housing or employment uses), and the MSANP is clearly an appropriate vehicle for taking the issue further. As paragraph 1.4 of the Plan says: *“Neighbourhood planning has been promoted through the Local Plan as a way for local communities to develop their own vision and set out what development they need and where it should be built”*.
38. The Basic Conditions Statement sets out the approach taken to underpin the MSANP’s policies in relation to housing provision. This was informed by an independent Housing Needs Assessment Report carried out by Dorset Planning Consultant Ltd, finalised in October 2018. The concluding table of that report summarises the factors taken into account in arriving at the final housing needs figure – these include the Parish’s assumed (pro-rata) share of the 825

dwellings outside the main centres; past build rates; affordability data; and population and housing mix data. The result is a figure in the range 36-78 dwellings, with 56 being selected for the purposes of the Plan. 11 dwellings had already been built since the beginning of the Plan period (2018) and 13 more had been granted planning permission since then. This leads to a final requirement of 32 dwellings. Over the Plan period, it was calculated that the Parish would experience in total a 12% increase in the housing stock.

39. The report recommends that the calculation of housing need should broadly reflect the latest local Strategic Housing Market Assessment (2015), which suggests a slightly higher annual requirement across North Dorset. In addition, further flexibility is advocated in order to reflect the DCLG's draft Indicative Assessment of Housing Need (as at September 2017), which suggested that the starting point for considering "objectively assessed need" for North Dorset should be increased. I understand that this approach is currently being adopted in the review of the Local Plan. Dorset Planning Consultant Ltd conclude that adopting these higher targets is likely to result in "a more robust assessment of general housing need for the area". The overall methodology is, however, the subject of objections on behalf of two interested parties.
40. Consultants Savills act on behalf of Lewis Wyatt (Construction) Ltd – Wyatt Homes, who have an interest in land to the north of Blandford Hill, to the east of the main part of the village. This site is subject of a planning application (currently undecided) for the erection of 47 dwellings, including 19 affordable homes (ref: 2/2018/0652/FUL). In addition to their site-specific objections (to which I will return when considering Policy MSA5), Savills consider the approach to the calculation of housing need to be flawed, for the following principal reasons:
- the Local Plan was adopted on an out-of-date evidence base and the reviewed version of it is behind schedule;
 - local government re-organisation is taking place, and the new Dorset Council is likely to wish to progress a unitary local plan as soon as possible. There is, according to Savills, "a clear direction of travel to no longer progress with the Local Plan reviews in the area...."¹⁰, adding to further delay in updating the strategic context for calculating housing need;
 - the recently-published Housing Delivery Test shows that North Dorset has to boost its supply figure by 20%; and
 - NDDC accept that (at December 2018), the area has a 3.3 years supply of land (Savills say the more realistic figure should be in the range 2.03-2.69 years), as opposed to the standard 5-year requirement.
41. Savills also dispute one minor aspect of the SEA exercise in relation to their clients' site. This in practice has little impact on the overall conclusion; more generally, I note that no objection is raised to the way the exercise was carried out, and no issues arise in relation to the scope of this examination.

¹⁰ The source of this assumption relates to a minute recording decisions of the Shadow Executive Committee for the new authority which met on 11 February 2019. It does not state that work on the existing local plan reviews should be abandoned, but proposes that "all existing work carried out to date....be used where possible to shape the new Dorset Local Plan". In addition, I note that the current (2 April 2019) website states that the NDDC will publish a consultation report on the Issues and Options document for the North Dorset plan "in due course".

42. Savills conclude that: *“this background is entirely relevant to the examination of the Milborne St Andrew Neighbourhood Plan in determining whether it meets the basic conditions. At no point in any of the Neighbourhood Plan submission documents is there any acknowledgement that the North Dorset Local Plan Part 1 is out of date and has been for some time, nor that the Council cannot demonstrate a 5 year housing supply.....Acceptance of the submission Neighbourhood Plan would effectively be an acceptance that upon the plan being made it would immediately form part of an out of date development plan”*. They also consider the decision to apportion the housing requirement in the rural areas on a pro-rata basis fails to allow for the variations in the villages’ sustainability and therefore their ability to accommodate new development. They say the Plan should “look to increase its housing needs in line with projected increases and allocate more sites to ensure that it can meet these needs”.
43. Alder King adopt a similar position on behalf of Wessex Strategic Ltd, who have a controlling interest in land to the south of Blandford Hill known as Homefield, and which is the subject of an outline planning application (ref: 2/2018/1577/OUT) again currently undetermined. As with the previous representation, they seek to promote their clients’ site over that selected for development in the Plan (see Policy MSA5). They consider that the Plan fails to meet its identified affordable housing needs, and that it is insufficiently “future-proofed”, for reasons similar to those given by Savills (and specifically because only one site is allocated for housing). The conclusion they reach is that, on a pro-rata basis, a minimum of 52 new homes would be needed in Milborne St Andrew, with 21 of these being affordable.
44. Alder King quote paragraph 29 of the 2018 version of the NPPF: *“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”*.¹¹ Alder King suggest that this requirement is not met.
45. I have noted the advice at paragraph 040 of the PPG¹², to the effect that: *“there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan ...”*; and also that, where neighbourhood plans contain policies relevant to housing supply, *“these policies should take account of latest and up-to-date evidence of housing need....”*.
46. I consider that, so far as the MSANP’s approach to the identification of housing need is concerned, these requirements are met. In particular:
- it cannot be doubted that the Plan explains clearly and succinctly the intention and the rationale of its policies;
 - due regard has clearly been given to the various factors which have underpinned the calculation of housing need set out in the Plan, including those that suggest the need for some flexibility;

¹¹ This covers similar ground to paragraph 184 of the 2012 version of the NPPF

¹² Reference ID: 41-040-20160211

- given the broader context within which neighbourhood plans are prepared, as well as in terms of the basic conditions, I consider it to be both unreasonable and unnecessary to hold up progress on the Plan in the way that is being sought. It is clear to me that national guidance cannot be interpreted in such a way as to result in neighbourhood plans effectively being in a prolonged state of uncertainty (even if there is the prospect of fluidity at the strategic level due to factors such as local government reorganisation). In my opinion, the MSANP has been prepared on the basis of a reasonable understanding of the evidence about housing need as it existed at the time, and that is as much as could be asked of it;
- the NPPF requirement is that neighbourhood plans “should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”. I am clear that the MSANP does not do this, and to that extent it satisfies basic conditions (a) and (e);
- it is in any event clear that the Parish Council understand the need for monitoring and reviewing the Plan in due course (see paragraphs 1.14 and 1.15), something that may well be brought into sharper focus as progress is made on the revisions to the strategic planning framework for the North Dorset area;
- it also remains the case that any planning application for development of land not allocated in the MSANP would need to be assessed on its merits, and in the light not just of the development plan, but all other material planning considerations – such as the latest information about the supply of, and need for, housing land, and the broad presumption in favour of sustainable development;
- I also take note of the fact that Policy MSA1 specifically allows for the possibility (in certain carefully-prescribed circumstances) of unallocated greenfield sites outside the settlement boundary being released for housing, thus providing further flexibility should the need for it be demonstrated.

47. Given the above analysis, ***I recommend that no changes be made to the Plan arising from the objections to its conclusions in relation to the housing land requirements.***

The policies

Policy MSA1: Meeting local needs – amount and location of new development

48. This policy puts into effect the approach discussed in the previous section. It firstly states that, when added to the limited infill allowed for under the Local Plan and an allowance for the conversion of rural buildings, the land allocations “should more than meet the projected housing need of about 2.8 dwellings per annum over the Plan period”. The second element of the policy sets out the approach to be taken in relation to proposals outside the settlement boundary, to which I also referred earlier.
49. I am satisfied that Policy MSA1 meets the basic conditions in that it meets the NPPF requirement to plan positively to meet local housing needs, and that this should be done in the context of the settled strategic framework provided by the adopted development plan for the area. As a minor point, given that only one site is allocated for development (the subject

of Policy MSA5), *I recommend that the first line of the policy read “Sufficient land is allocated.....”, rather than “Sufficient sites are allocated.....”.*

Policy MSA2: Meeting housing needs – dwelling types

50. Policy MSA2 reflects the evidence of local housing needs in the Parish gathered during the plan preparation period. It does not seek to impose specific targets for different categories of need, nor to prioritise them. Instead, the policy simply states that the type and size of housing to be permitted should “primarily provide” affordable homes for rent; starter and shared ownership affordable homes; one, two and three-bedroom open-market homes; and homes specifically designed for people with more limited mobility. In addition, conditions may be imposed on planning permissions to ensure that the supply of smaller homes is not eroded by future extensions. Finally, larger open-market homes (effectively with four or more bedrooms) “will require special justification”, and should be designed to allow for potential future sub-division.
51. Savills object to the last of these elements, which they say is inconsistent with Local Plan Policy 7. This states that the local planning authority will support a split of “about 40% of market housing...as one or two bedroom properties and about 60% of market housing as three or more bedroom properties”, something which reflects the 2015 SHMA requirement of 16% of new open-market housing to be of four bedrooms or more. For this reason, they conclude that the “special justification” requirement should be removed from the Policy.
52. As it is worded, this last element of Policy MSA2 does not explain what kind of evidence an applicant would be expected to supply in order to satisfy its terms (and I note that there is nothing in the supporting material – paragraph 4.5 - which precedes it). While I consider that Savills over-state the extent to which the reference to a special justification leads to significant conflict with LP Policy 7, the broad policy emphasis is clear without the need to include something whose practical implications are unclear. ***I therefore recommend that the requirement for a special justification to be provided to support applications for open-market homes containing four or more bedroom be deleted.***
53. NDDC question the reference to the possibility of conditions being imposed on permissions for new dwellings to restrict their extension, suggesting instead that potential adverse impacts are considered before conditions are applied (since they might not actually be needed). It seems to me that the simple phrase “where appropriate” allows for the necessary flexibility on this point and therefore that the policy need not be re-worded.

Policy MSA3: Meeting employment needs – business requirements

54. The Basic Conditions Statement records the fact that the Local Plan does not set any specific employment targets for Milborne St Andrew, but adds that the latest evidence suggests that there is unmet need locally. This approach of considering employment needs locally is supported by the Local Plan. The main existing employment sites at the Business Centre and Deverel Farm are said to be well used and not able to meet the level of enquiries for small workshops and larger manufacturing and servicing businesses.

55. Policy MSA3 seeks to protect all the existing employment sites (including a range of smaller ones), and contains a presumption in favour of their being able to re-configure to meet changing needs. In addition, new smaller enterprises will be supported in principle. Specific support is given to the expansion of Deverel Farm so that it can accommodate a range of larger businesses, subject to a number of environmental and related safeguards.
56. I am satisfied that, as well as being in broad conformity with the Local Plan, Policy MSA3 has strong support from NPPF paragraph 28, and thus that it meets the basic conditions.

Policy MSA4: Supporting community facilities

57. Figure 3 of the MSANP is a bar-chart showing the full list of community assets enjoyed in the village and the value that local residents place on each of them. Policy MSA4 supports their improvement in principle, subject to the character of the area being safeguarded. This objective is supported at national and local level, and there are no issues in relation to the basic conditions.
58. Savills consider that the Plan should include a generic expression of support for additional surgery capacity (an issue highlighted at paragraph 4.12 of the document), rather than the matter being dealt with as a requirement of a land allocation (see policy MSA5). They draw attention to the fact that their clients' current proposal would meet the identified need. Alder King make a similar point, but I see no reason, given the scope of this examination, to make any recommendations in connection with these representations.

Policy MSA5: Development of the Camelco site

59. This represents the most significant site-specific proposal in the Plan. It concerns an area of "brownfield" land south of the A354 (Blandford Hill) to the east of the village itself (and beyond the existing settlement boundary), previously used in connection with a food production facility. Policy MSA5 allocates it for a mixed-use development including housing, employment and community facilities, subject to a list of 15 detailed requirements. Paragraph 4.39 of the supporting material states that there would be sufficient room for at least 32 dwellings ("but potentially a higher number, given the need for smaller dwelling types"), once the land requirements for employment uses, highway improvements, accessible green space and community buildings are taken into account.
60. The allocation is supported by Ken Parke Planning Consultants, acting on behalf of Bracken Developments Ltd. Their representation is accompanied by a planning statement prepared in connection with an intended application for outline planning permission (access only) to develop the site for up to 61 dwellings, business units and a pre-school nursery¹³.
61. While Alder King and (by inference) Savills comment on the relative suitability of the Camelco site to meet the housing and employment needs concerned, neither of these representations suggests that the proposed allocation, in its own terms, fails to meet any of the basic conditions, and I have no reason of my own to come to a different view. On my visit, I noted that it contains derelict buildings, considerable amounts of hard-core and earth-mounds, together with

¹³ A web-search reveals that the application was made to NDDC on 19 March 2019.

extensive areas of hard-standing, leading to an access on to Lane End, near the junction with the A354: the re-use of a substantial (2.2ha) site on the edge of the village for a mixed use development would clearly accord with a range of national and local planning policies.

62. This land emerged as the top-scoring site following a “call for sites” exercise in 2017 conducted by the MSANP working group, and based on seven criteria for selection, which are set out in Figure 2 of the Plan document. Paragraphs 4.32 - 4.35 contain a summary of the group’s conclusions: those sites which generally scored positively against the criteria featured in the options consultation, and the choice was then narrowed down to three, the owners of which were invited to present their ideas at an open meeting in November 2017. Paragraph 4.35 says: “There was no clear “second place” in terms of local opinion or sustainability, and although consideration has been given as to whether a reserve site should be identified, this seems unnecessary given that the Camelco site will more than meet the identified local need for the plan period”.
63. Alder King consider that their clients’ Homefield site is a better “fit” than Camelco since (for a number of reasons) they believe the latter to be uneconomic to develop, and thus that it would be unable to deliver the community benefits sought. They provide a detailed assessment of the strengths and weaknesses of each site as they see them, concluding that Camelco “does not represent sustainable development when compared to reasonable alternatives”¹⁴. They recommend that it be replaced in Policy MSA5 with Homefield or that both sites are allocated (with Camelco held in reserve).
64. Savills make no explicit comparison of the merits of their clients’ land north of Blandford Hill and those of the Camelco site, although it is clear to me from their representations that they consider the former is to be preferred. One example of this is their suggestion that the Plan would be improved if the provision of a new surgery (an aspiration found at paragraph 4.12) were the subject of “a generic expression of support” rather than “a delivery requirement of an allocation policy” (a reference to criterion g) of Policy MSA5). Alder King make a similar comment.
65. Mrs Pye states that the criteria set out in Figure 2 differ slightly from those used in the initial selection process and this, together with some other procedural criticisms, leads her to suggest that the Plan’s conclusions about the merits of the various sites are misleading (and even biased in favour of the Camelco site).
66. PPG paragraph 042¹⁵ states: “A *qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria*”, and it is clear to me that that requirement has been met in the case of the MSANP. I note in any event that the criticisms received to policy MSA5 do not (with the possible exception of some of Mrs Pye’s comments) extend to the basic methodology adopted, which seems to me to be both comprehensive and rational; rather, in their various ways, the objectors question the judgements that were ultimately reached.
67. It is not within my remit as an Examiner to reach any conclusions of my own on the outcome of the site-selection exercise, especially given what I have said about the

¹⁴ Alder King assert that the Plan “fails to achieve sustainable development” *per se*, but the bulk of their representation is devoted to a comparative analysis of the merits of the alternative sites.

¹⁵ Reference ID: 41-042-20170728

evidence of compliance with PPG paragraph 042. Any allegations of significant procedural irregularities are capable of being addressed by other means. I have concluded that Policy MSA5 meets the basic conditions.

Policy MSA6: Settlement boundary

68. The opportunity has been taken to make minor adjustments to the settlement boundary for the village established in the 2003 Local Plan. These are limited to the inclusion of land now built on or with planning permission, together with land well-related to the village core; and the exclusion of open land on the edge of the settlement and land associated with community buildings, where such areas are considered to be inappropriate for development in principle. Paragraph 4.42 says that the Camelco site has not been included within the settlement boundary because it is thought preferable to address the matter once the scheme has been built (and potentially when the Plan is reviewed).
69. NDDC, to summarise their representation, envisage scope for conflict between the MSANP and the adopted Local Plan (which includes a presumption against development in rural areas beyond settlement boundaries). I agree with that concern, which is shared by Savills and Mrs Pye. I can see no disadvantage in the Plan adopting what is generally-accepted best practice in this respect. ***I therefore recommend that Figure 5 (the revised settlement boundary) be amended to include the Parish Council's reasonable interpretation of the anticipated land-take in relation to Policy MSA5. In addition, I consider it would be helpful if Figure 5 indicated those areas of land subject of the revisions referred to in paragraph 4.41. This recommendation (and that which follows) should also be reflected in the Policies Map which opens the Plan document.***
70. I also think it desirable that some thought be given to the way the boundary is drawn in the vicinity of the Milborne Business Centre: at present, this land lies outside the designated settlement, although there are two very small residential enclaves, one on either side of it, which are included. Were my recommendation above to be accepted, the exclusion of this important site would become somewhat anomalous. ***I therefore further recommend that consideration be given to a more comprehensive approach to the settlement boundary in this area, which would be likely to lead to a single detached element of built form (and proposed built form) being brought within it, lying both north and south of the A354.***

Policy MSA7: Creating safer roads and pedestrian routes

71. Section 5 of the Plan deals with the related issues of development and traffic generation, focusing on the safety of pedestrians trying to cross (and to walk along) the main A354. An additional element identified as needing attention is the visual impact of any traffic management measures which might be proposed. Table 3 lists the locations where action is considered necessary. Policy MSA7 encourages more walking in new developments, through a range of design measures; it also seeks proportionate developer contributions towards the schemes sets out in Table 3. These requirements are supported by several elements of the NPPF and Policy 13 of the adopted Local Plan: the policy satisfies the basic conditions.

Policy MSA8: Parking provision

72. This policy requires parking in connection with new or extended homes (including conversions) to be provided in accordance with figures set out in Table 5. This is a very detailed and specific set of figures which is based on the data gathered from the household questionnaires completed in the early stages of the Plan. It is acknowledged that the requirements exceed those of the current County standards “to better reflect the real-life situation of the village, where car ownership levels are high and public transport simply not flexible enough to forego the need for a car”. The policy also requires the design of any parking areas to be sensitive to the village’s character.
73. Savills object to the proposed increase in parking requirements over and above those adopted by the County Council. They say that the case for an increase is not made (suggesting a skewed statistical exercise when the survey results were assessed) and a conflict between the additional parking and the need to avoid large areas of hard-standing (a design issue mentioned in the policy). Savills add that the NPPF seeks to promote sustainable forms of transport.
74. It is clearly outside the ability of a neighbourhood plan to achieve anything worthwhile in relation to improvements to public transport, and for that reason I do not consider that Policy MSA8 is flawed when judged against the basic conditions. That having been said, it seems to me that it is over-prescriptive and that the justification for departing from a county-wide approach to parking requirements is weak. The Plan suggests (paragraph 5.11), that car ownership levels in two and three – bedroomed houses are already higher than the projections for 2026 – but I do not see that that, of itself, is a strong reason for abandoning the county guidelines.
75. I respect the discretion which neighbourhood plans have been given to reflect local circumstances “on the ground”; but in this case, it is most unlikely that Milborne St Andrew is any different from scores of similar villages in Dorset, such that there is a clear case for departing from an accepted approach to parking provision. ***I therefore recommend that Policy MSA8 be amended to remove the need to comply with the figures set out in Table 5.***

Policy MSA9: Reinforcing local landscape character

76. Section 6 of the Plan describes the landscape character of the wider area within which the Parish sits, highlighting the importance of the stream corridor, hedgerows and trees, and significant areas of woodland. There is also reference to the richness of the local archaeological remains. Policy MSA9 seeks to ensure that development respects and enhances these characteristics. This objective clearly accords with national and local policies; ***however, I recommend that the first line of the policy include the phrase “where practicable”: “Development should respect and, where practicable, enhance local landscape character....”***

Policy MSA10: Protecting local wildlife

77. This policy is similar to the previous one. It requires development to enhance biodiversity and to protect the existing ecological network (shown in Figure 8). A certified biodiversity mitigation and enhancement plan would be required in certain, specified, circumstances. There are no difficulties from the point of view of the basic conditions; however, as with Policy MSA9, it may not always be appropriate or possible to secure enhancements to an asset (as opposed to ensuring the absence of harm). ***I recommend that the first sentence of the policy be amended to read: “Development should protect and, where practicable, enhance biodiversity through an understanding of the wildlife interest that may be affected by the development, and the inclusion of measures that will protect the existing ecological network (as shown in Figure 8) and, again, where practicable, secure an overall biodiversity gain.”.***

Policy MSA11: Local green spaces

78. This policy gives effect to NPPF paragraph 76: *“Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances”*. Paragraph 77 of the NPPF goes on to say that the Local Green Space (LGS) designation will not be appropriate for most green areas or open space, and should only be used where three criteria are met, namely:
- *where the green space is in reasonably close proximity to the community it serves;*
 - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and*
 - *where the green area concerned is local in character and is not an extensive tract of land.*
79. Table 7 of the Plan lists 10 locations which it is proposed to protect as LGS, giving brief reasons for the choice, and these are shown on Figure 9. I looked at all of them on my visit to the village. They range in size from the very small (eg at The Green) to the substantial area of land known as The Grove, which provides a stream-side setting for the southern part of the village. The policy satisfies the basic conditions; as evidence of the sensible discretion with which the exercise was carried out, I note that two other areas of land, designated as locally important in the 2003 Local Plan, have not been designated as LGS for the purposes of the MSANP (for reasons given at paragraph 6.15).
80. Dorset County Council consider that LGS10 (The Green at Bladon View, referred to above) falls short of the NPPF tests. They say that it is “an area of highway.....(which) has a particular singular purpose and should not be designated otherwise”, and that it fails to meet any of the

criteria at paragraph 100b¹⁶. There is, however, no prescribed method of satisfying these criteria, beyond considering the results of the pre-submission consultation process. I have noted that in the case of the MSANP this is summarised, together with a clear and detailed assessment (which resulted in a number of possible sites being rejected as not satisfying the tests) in a document available online as part of the evidence base for the Plan. I am satisfied that this provides evidence that the exercise was carried out in line with the intention of the NPPF requirements (and reflects Local Plan policy 15) and I therefore make no recommendation regarding the list of sites identified for protection in Policy MSA11.

Policy MSA12: Improving recreational opportunities, and having regard to European and internationally protected sites

81. This policy has two elements. The first seeks protection and enhancement of informal outdoor recreation opportunities (including the footpath network) and is guided by figures in Table 8. This mirrors the approach in the Local Plan, which uses quantity standards set out by Fields in Trust (FIT) in respect of outdoor space, including for sport and play. Paragraph 6.17 of the Plan says that the village falls short of these optimum figures in four of the five categories of recreation activity shown in Table 8. The policy requires development to protect and, where possible, enhance recreational provision and that, with schemes of 10 or more dwellings, this should be done on site unless it is not practical to do so. Where on-site provision is not possible, suitable off-site facilities will be required.
82. Savills say that it is unclear how the requirements in Table 8 have been derived, and question the relationship with the FIT approach, and thus with the Local Plan (in particular in relation to the 10-dwelling threshold). In addition, they object to the need for the Parish Council to support any off-site arrangements. I do not consider that any conflict with the Local Plan on this issue produces difficulties in relation to basic condition e); ***however, I agree that it is not appropriate for any off-site provision to require the clear support of the Parish Council as a pre-condition, and I recommend that that reference in the last sentence of part a) of Policy MSA12 be deleted.***
83. I have noted Mrs Pye's doubts about the deliverability of some of the Plan's aspirations in relation to extensions to the footpath network, but these have little significance so far as my examination is concerned.
84. The second part of the policy deals with the need for any development to avoid having an adverse effect on Poole Harbour or the Dorset Heathlands, both of which are internationally-important wildlife habitats. The policy requires a Suitable Alternative Natural Greenspace or a Heathland Infrastructure Project to be agreed with Natural England before any approval can be given to a housing scheme containing more than 10 dwellings, and is in line with current practice in the wider area. Arising from the results of the Habitats Regulations Assessment referred to earlier, ***I recommend that the policy require any net new residential development within 5km of the European site to ensure no adverse effects on its integrity; that reference to "planned development or pending applications" be replaced with the phrase "project or plan"; and that reference is made to the need for adherence to the Nitrogen Reduction in Poole Harbour Supplementary Planning Document.***

¹⁶ The equivalent in the 2012 version of the NPPF is paragraph 77

Policy MSA13: Locally-important character features

85. This policy sets out a range of physical features in the village (such as the stream and its bridges, the flint walls etc) which contribute significantly to its particular character. The policy seeks to ensure that care is taken to retain and improve these elements and their setting. Again, there is a need to acknowledge that improvement may not always be possible through the development management process, **and so I recommend that the phrase “where possible” be included in the first sentence of the policy: “Care should also be taken to retain and, where possible, improve existing features.....”.**

Policy MSA14: Character and design guidance

86. Policy MSA14 sets out some general and some specific guidance on a wide range of design matters. In principle, there is nothing here which fails to reflect national and local planning policy advice; however, I agree with NDDC’s comment about its detailed nature and with Savills who (although they do not use the term) consider elements of it to be too prescriptive – in particular, references to the density of housing schemes and the depths of rear gardens.
87. Rather than suggest a re-wording of the policy to reflect these criticisms, **I am content that the Parish Council re-visit the precise scope and wording of Policy MSA14, with the following points in mind:**
- **generally, the policy should be greatly simplified, concentrating on the broad requirement for new development to respond positively to the local character and history of the area, in order to reinforce the sense of place. The detailed components of design should be contained in the supporting material, if necessary by adding to Table 11¹⁷ or the text in paragraphs 6.29-6.33;**
 - **the references to new development being required to be “visually attractive” or involve “good architecture” are too vague and subjective and should be deleted;**
 - **the requirements for the density of housing to be below 20dph and for rear garden lengths to be a minimum of 20m are too prescriptive and should both be deleted. Reliance should instead be placed on a case-by-case assessment of schemes against the overall policy objectives and the supporting material;**
 - **the references to a mix of building styles, the need for affordable housing to be indistinguishable from market housing, the requirement for details of utility fixtures to be included within an application and the desire to discourage high boundary walls and fences are all relevant development management guidance for applicants, and should be retained in the policy.**

Policy MSA15: Minimising flood risk

88. Milborne St Andrew has a history of problems caused by flooding caused both by the Bere stream overflowing and by surface-water run-off at times of heavy rainfall. This policy says that all development upstream of March Bridge which is likely to produce increased surface

¹⁷ This is referred to as Table 10 in the fourth paragraph of the policy, which I take to be a typographical error

water run-off eventually discharging into the Bere must be supported by a surface and foul water strategy which satisfies four specified criteria. Paragraph 7.5, while not a policy in its own right, notes that the relevant Flood Risk Management Team should be consulted on all development proposals for one dwelling or more in flood risk areas: NDDC point out that this approach deviates from national minimum standards, but acknowledge that the village has specific issues and that the more rigorous approach set out in the policy is supported by Wessex Water. I have also noted that no objections were raised by Dorset County Council. As a footnote, I commend the Plan for including a summary of the sometimes confusing responsibilities of public and other agencies, and of landowners, in relation to flooding issues.

Projects

89. The Plan also includes four “Projects”, dealing with a suggested Community Land Trust; traffic Management; where and how the Suitable Alternative Natural Greenspace will be delivered; and a Conservation Area appraisal. All these are properly separated out from the strictly land-use policies, while helpfully being located close to the text to which they are related.

Conclusions on the basic conditions

90. I am satisfied that the Milborne St Andrew Neighbourhood Plan makes appropriate provision for sustainable development. I conclude that in this and in all other material respects, subject to my recommended modifications, it has appropriate regard to national policy. Similarly, and again subject to my recommended modifications, I conclude that the Plan is in general conformity with the strategic policies in the development plan for the local area. There is no evidence before me to suggest that the Plan is not compatible with EU obligations, including human rights requirements.

Formal recommendation

91. I have concluded that, provided that the recommendations set out above are followed, the Milborne St Andrew Neighbourhood Plan would meet the basic conditions, and I therefore recommend that, as modified, it should proceed to a referendum. Finally, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan Area, but I have been given no reason to think this is necessary.

David Kaiserman

David Kaiserman BA DipTP MRTPI
Independent Examiner

13 May 2019

APPENDIX 1 – SUMMARY TABLE OF RECOMMENDATIONS

Examiner's report paragraph	NP reference	Recommendation
20	Policies MSA1, MSA3 and MSA5	<ul style="list-style-type: none"> include reference to the <i>Nitrogen Reduction in Poole Harbour SPD</i> and the <i>Dorset Heathlands Planning Framework SPD</i> as appropriate
33		<ul style="list-style-type: none"> add pages numbers throughout the Plan to correspond with the Contents Page
49	Policy MSA1	<ul style="list-style-type: none"> change first line of policy to read "Sufficient land is allocated..."
52	Policy MSA2	<ul style="list-style-type: none"> delete the requirement for special justification to support applications for open-market homes containing four or more bedrooms
69	Policy MSA6	<ul style="list-style-type: none"> amend Figure 5 (revised settlement boundary) to include anticipated land take as per Policy MSA5 and to indicate areas of land subject to revisions
70	Policy MSA6	<ul style="list-style-type: none"> consider a more comprehensive approach to the settlement boundary in the vicinity of the Milborne Business Centre
75	Policy MSA8	<ul style="list-style-type: none"> remove the need to comply with the figures set out in Table 5
76	Policy MSA9	<ul style="list-style-type: none"> include the phrase "where practicable" in the first line of the policy
77	Policy MSA10	<ul style="list-style-type: none"> amend the first paragraph of the policy
82	Policy MSA12	<ul style="list-style-type: none"> in the last sentence, delete the requirement to have the clear support of the Parish Council as a pre-condition
84	Policy MSA12	<ul style="list-style-type: none"> detailed amendments to the wording of part b) of the policy
86	Policy MSA13	<ul style="list-style-type: none"> include the phrase "where possible" in the first line of the policy
87	Policy MSA14	<ul style="list-style-type: none"> revisit the precise scope and wording of the policy bearing in mind a number of specific points