**HEALTH CHECK**

 **Paragraph 2.9 – Response/Comments**

**BASIC CONDITIONS STATEMENT**

The structure of the Basic Conditions Statement is confusing in several respects, and the content could be better expressed in places. Please note the guidance in PPG, paragraph 70. Several changes are suggested, see below.

There are a series of headings in this document. Some of these cross-refer to the relevant paragraphs contained in the NPPF. This is useful. However, not all relevant policies in the NPPF are listed in respect of each heading. This gives the impression that policies not listed have not been considered. If it is intended that this approach should be maintained, then it is suggested that it could be specifically stated at paragraph 8 that all relevant policies in the NPPF have been considered, and then list those policies which are considered to be relevant.

**Paragraph 8**

1. As a general point, this paragraph could usefully introduce and cross-refer to the content in the remainder of the document.
2. The first sentence of this paragraph should be expanded. It could usefully address paragraphs 15 to 17 of the NPPF. These contain policies specifically on plan-making which are not addressed elsewhere. Following this, the paragraph should be expanded to state the following - “*particular NPPF policies on plan-making are examined under separate headings below*”.
3. It should also be confirmed that the PPG Part 5 (Neighbourhood Planning) has been considered and will be referred to where relevant.
4. The second sentence refers to conformity with the Local Plan, but it would be apposite to state that reference to the Local Plan is subject to further examination, below. Also, there is a difference in wording between “*conform*” and “*has regard to*”. This suggests that the WNDP is not in conformity with the emerging Local Plan. This inconsistency should be addressed
5. The third to seventh sentences should be removed and re-inserted in paragraph 18 which refers to Sustainable Development.

**Paragraph 9**

1. The contents of this paragraph relating to Sustainable Development should be merged and consolidated with the information contained in paragraph 18. In paragraph 18 Sustainable Development is discussed in the context of how the draft WNDP contributes to Sustainable Development. This avoids duplication of information.
2. The objectively assessed needs of SODC should be identified by reference to the sustainability appraisal of the Local Plan (see NPPG paragraph 72). It is also necessary to provide an explanation of how the WNDP will contribute towards the objectively assessed needs of SODC, i.e. how many houses are allocated? This will lead to some inevitable repetition with paragraph 13, and this should be avoided, if possible.
3. The identification of WNDP policies by reference to NPPF policies, is to be commended. However, this identification should be rendered more specific. In other words, it should be stated which NPPF policy is being referred to in relation to each WNDP policy. The precise wording of each NPPF policy should also be reproduced.

**Paragraph 11**

There should be reference to relevant WNDP policies

**Paragraph 13**

Paragraph 50 of the NPPF identifies several points. These have not been addressed, such as the size, type, tenure and range of housing

**Paragraph 18**

As to the duplication between the contents of this paragraph and paragraph 9, see above. As stated, the issue of Sustainable Development is referred to in both paragraphs. Merger, or consolidation of the contents of these paragraphs is recommended*.*

**DRAFT PLAN**

**Generally**

The structure of the draft Neighbourhood Plan should be the subject of some re-appraisal, and re-structuring, together with re-ordering of the content.

One basic problem that arises relates to the system of classification of Objectives and Policies. The system utilised is a numerical classification, with alphabetic sub-paragraphs. Currently this is used in ***Section 4 - Vision and Objectives*** wherethere are six “core” Objectives, and also in ***Section 6 - Policies***. Each one of these six Objectives in ***Section 4***, although of merit in each case, creates some confusion for the reader when reference to the nine policies contained in ***Section 6 – Policies***. The same classification system is utilised. There is further confusion when regard is had to the seven evidenced-based headings in **Section 5**. This duplication provides for some confusion when cross referencing occurs.

It is therefore suggested that in the six “core” Objectives in ***Section 4 - Vision and Objectives*** should be re-classified as CO1 to CO6 i.e. as “Core Objectives”, and each sub-paragraph can be described as CO1(a), or whatever formula seems appropriate. This then would avoid the problem of there being more than 1a, or 1b etc in the draft WNDP.

**The Sections as re-constituted are as follows**

Instead of defining **Section 1** of the WNDP as **“*Development Strategy*”**, it is instead suggested that this should be re-entitled **“*Introduction*”**. The contents of this newly constituted Section should then explain (in separate sub-sections) the purpose of the document, the contents of the document and the neighbourhood plan process. Suggested sub-paragraphs are the following – Neighbour Planning; Watlington – History and its current circumstances/position; the Parish today; Our concerns; the purpose of the Report and the structure.

The content of **Section 2 *(“Setting the Scene”*)** should be incorporated into this new ***Introduction*** section as a separate sub-heading.

**Section 2** should be re-constituted as the **“*Watlington*” Section** (currently **Section 5**), and the text currently within the existing **Section 5** should be transposed. This should be re-named as **“*Strategy and Objectives*”**. The transposed text should be incorporated into the new Section and placed towards the beginning of the document. It would also be appropriate to remove the cross-references to the Objectives in this Section as it provides a degree of confusion.

**Section 3 (“*Community Engagement and Consultations*”)** should remain where it is.

**Section 4 (“*Vision and Objectives*”)** should refer to the housing allocations, and the text incorporated prior to the Section setting out the WNDP Policies. The reason for this is that the housing allocations provide the basis as to how the area should be planned for during the plan period.

**Section 6 (“*Policies*”)** is to be reconstituted as **Section 5**. This sets out the nine neighbourhood plan policies. See above for specific recommendations.