

Edgmond Parish Neighbourhood Plan

Report of Examination

Report to Telford & Wrekin Borough Council

by the Independent Examiner:

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20 December 2017

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Summary

1. From my examination of the submitted Edgmond Parish Neighbourhood Plan and the supporting documents, including all the representations made, I have **concluded** that, subject to the modifications I recommend, the Neighbourhood Plan should be made.
2. I have concluded that, subject to modification, the plan meets the Basic Conditions. In summary, the Basic Conditions are that it must:
 - Be appropriate to make the plan, having regard to national policies and advice;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan; and
 - Not breach, and be otherwise compatible with, European Union and European Convention on Human Rights obligations.
3. I have concluded that the plan meets the legal requirements in that:
 - It has been prepared and submitted for examination by a qualifying body – Edgmond Parish Council;
 - It has been prepared for an area properly designated;
 - It does not cover more than one neighbourhood plan area;
 - It does not relate to “excluded development”;
 - It specifies the period to which it has effect – to 2031; and
 - The policies relate to the development and use of land for a designated neighbourhood area.
4. Overall, I **recommend** that the Neighbourhood Plan should proceed to Referendum.
5. The plan area is the same as the whole parish; I do not believe that the plan’s policies will impact beyond it and therefore **recommend** that the referendum area be the same as the civil Parish, the designated area.

1. Introduction

- 1.1 I am appointed by Telford & Wrekin Borough Council, with the support of the Edgmond Parish Council, the Qualifying Body, to undertake an independent examination of the Edgmond Parish Neighbourhood Plan, as submitted for examination. I was appointed as independent Examiner in November and carried out an unaccompanied site visit in December 2017.
- 1.2 I am an independent planning and development professional of 40 years standing and a member of NPIERS' Panel of Independent Examiners. I am independent of any local connections and have no conflicts of interests.

The Scope of the Examination

- 1.3 It is the role of the Independent Examiner to consider whether making the plan meets the "Basic Conditions." These are that in making the Neighbourhood Plan it must:
- be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan (see Development Plan, below) for the area; and
 - not breach, and must be otherwise be compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 1.4 Regulations also require that the Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 1.5 In examining the Plan I am also required to establish if the plan complies with certain legal requirements; in summary they are whether it:
- Has been prepared and submitted for examination by a qualifying body;
 - Has been prepared for an area that has been properly designated
 - Meets the requirements that they must not include excluded development
 - Relates to more than one Neighbourhood Area; and
 - Relates to the development and use of land.
- 1.6 Finally, as independent Examiner, I must make one of the following recommendations in relation to the Plan proceeding to a Referendum:
- a) that it should proceed to Referendum, on the basis that they meet all legal requirements;
 - b) that once modified to meet all relevant legal requirements it should proceed to Referendum; or
 - c) that it should not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

- 1.7 Second, if recommending that the Plan should go forward to Referendum, I am also then required to consider whether or not the Referendum Area should extend beyond the Neighbourhood Area to which the Plan relates.

The Examination documents

- 1.8 In addition to the legal and national policy framework and guidance (principally The Town and Country Planning Acts, Localism Act, Neighbourhood Plans Regulations, the National Planning Policy Framework and the Planning Policy Guidance) together with the development plan, the relevant documents that were furnished to me - and were identified on the Borough Council's websites as the neighbourhood plan and its supporting documentation for examination - were:

- Neighbourhood Plan (Reg 15 submission version)
- Basic Conditions Statement;
- Consultation Statement; and
- SEA and HRA Screening Statements.

I was also supplied with a Landscape Character Assessment (July 2017).

The Qualifying Body and the Designated Area

- 1.9 Edgmond Parish Council is the Qualifying Body for the designated area that is the neighbourhood plan area. Telford & Wrekin Borough Council, the local authority, designated the Neighbourhood Area in September 2016. There is no other neighbourhood plan for this area.

The Neighbourhood Plan Area

- 1.10 The parish of Edgmond lies 1.6 km to the north-west of Newport, Shropshire, within the Borough of Telford & Wrekin, comprising the village of Edgmond and eight outlying hamlets, together with Harper Adams University. The last census population was 2,062. Edgmond village has a church, primary school, village hall, two pubs and a recreation field. The heart of the village has a historic core within a Conservation Area containing a number of listed buildings.
- 1.11 The parish is set in a predominantly rural landscape, in agricultural land (grade 2 or 3), which is the dominant land use. The area sits on sand and gravel deposits. There is no record of local flooding and the vast majority of the parish lies in Flood Zone 1. The parish is served by a waste-water treatment plant.
- 1.12 The parish profile shows a rise of 5% in the population since the previous census. The parish has a relatively highly skilled population and a mean age of only 36 due to the presence of the University. Most working residents commute to work with a mean travel to work journey of 27.2 km; though nearly 19% work from home, twice the borough average and four times the average in England. There is only one bus service - the 519 - connecting the University to the village and on to Newport and Shrewsbury. The University also operates a student/staff shuttle to Newport. With poor public transport car ownership is high, with 37.4% of households having two or more cars/vans.
- 1.13 The parish is bisected by the east-west B5062 Shrewsbury Road, a single lane local

distributor road that marks the northern edge of Edmond village and connecting the parish to Shrewsbury and Newport. Many of the local roads are narrow with few footways. There is a signed cycle way through the parish from Newport to the University.

- 1.14 The parish is within the 10% least deprived neighbourhoods in England. Most of the housing stock (56.5%) is detached houses with virtually all the remaining stock semi-detached. House prices are higher than the borough average. Over 82% are owner-occupied with 5.8% social rented and the balance private rented or living rent-free. The majority (67.6%) are one family households with a quarter being one person households. A significant proportion of local housing contains members over 65 years old. There are a range of active clubs and societies in the parish. Harper Adams University offers facilities for hire.

2. Neighbourhood Plan preparation and public consultation

The Neighbourhood Plan's development

- 2.1 The Parish Council decided to apply for designation of the whole parish area in June 2016. The parish and area were designated in September 2016. The parish council's steering group has been preparing the plan since September 2016. Eight key themes were originally identified for public consultation and formed the basis for the early drop-in sessions: housing, green spaces, employment, community safety, rights of way, roads/pavements/street lighting, traffic & transport and community amenities. These were subsequently condensed into five main policy areas: housing, natural & heritage assets, employment/economy, infrastructure and Harper Adams University.
- 2.2 These five themes became the structure of the plan's policies. Non land use planning issues were excluded. The evidence base is largely drawn from the Borough Council's own material as they develop their new Local Plan. The principal local contribution is a specially commissioned Landscape character Assessment.
- 2.3 The steering group met regularly from June 2016 and published its deliberations on the parish website. As a small community the collection and dissemination of ideas was often informal. Three drop-in sessions were held which helped to shape the plan - first using eight themes, later refined to five. The Consultation statement sets out the main points as well as the summary of responses from the policy questionnaire.
- 2.4 Overall, fairly rapid progress was made. I am satisfied that appropriate arrangements were made for consultation and engagement with the local community and the principal stakeholders, such as Harper Adams University, on the preparation, development and drafting of the plan.

Environmental Assessment and EU Directives

- 2.5 Under Article 3(3) and 3(4) of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC a SEA is required of plans and programmes which "determine the use of small areas at a local level". The Borough Council as "responsible authority" determines if the plan is likely to have significant environmental effects.
- 2.6 In December 2016 the parish council submitted a formal screening request to the borough council as the responsible authority for a Strategic Environmental Assessment (SEA) and an Appropriate Assessment under the Habitats regulations. In January 2017 the Borough Council determined that neither was required, having

consulted with the relevant statutory authorities, as there were unlikely to be any significant environmental effects.

Pre-submission and Examination version – public consultation responses

- 2.7 The Consultation over 6 weeks under Regulation 14 took place in January and February 2017. The plan was duly revised to take into account the feedback and the changes and their rationale are set out in Appendices 4 and 5 to the Consultation Statement.
- 2.8 The plan was submitted to the Borough Council in August 2017 under Regulation 15. A 6-week consultation period from 14th September to 27th October took place.
- 2.9 A total of 17 representations were made, including the Borough Council (or 16 if the two reps from Protect Historic Edgmond - PHE - are taken together). There was a range of fairly limited comments from local residents - mainly focused on the extent of development at the University. There were no negative responses from Historic England, the Environment Agency, Natural England or Severn Trent (the Water Authority). PHE had a wider range of comments, which I have taken into account at the relevant policy, in the context of meeting the Basic Conditions.

Human Rights and European Obligations

- 2.10 I have no reason to believe that making the plan would breach or is incompatible with the European Convention on Human Rights or other EU obligations.

Plan period

- 2.11 The neighbourhood plan states, on its cover, in the Foreward and in the chapter on Monitoring and Review that it covers the period 2017 to 2031, which is co-terminus with the plan period of the Borough Council's (about-to-be-adopted) Local Plan.

Excluded development

- 2.12 A neighbourhood plan cannot include policies for excluded development, such as minerals and waste. I have concluded that the plan does not do so.

Recommendations

- 2.13 Overall, the plan is a well-presented document with a clear structure and is attractively laid out. I have concluded that it contributes to the achievement of sustainable development. In my report I deal with the formal examination of its policies. In doing so I set out recommended modifications, which are typically preceded by the expression I **recommend** (in bold).

3. The draft Neighbourhood Plan in its planning and local context

National policies and advice

- 3.1 The neighbourhood plan must have regard to national policies and advice, contained in guidance issued by the Secretary of State, and contribute to the achievement of sustainable development (the first two Basic Conditions). Paragraph 16 of the

National Planning Policy Framework (the Framework) is concerned with neighbourhood planning:

“The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:”

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *[and] plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;”*

3.2 The Framework explains at para 184 that: *“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area”*. And: *“Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans should not promote less development than set out on the Local plan or undermine its strategic policies.”*

3.3 The Framework’s policy guidance on Local Green Space designations is set out at para 77. The plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, para 042 of the Guidance explains that:

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

3.4 Also, there has to be evidence to support particular policies, notwithstanding it may express a strong and well-intentioned aspiration or concern of the local community. The Guidance (Para 040 ref 41-040-20160211) states:

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order 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 or the proposals in an Order.

A local planning authority should share relevant evidence, including that gathered to support its own plan making, with a qualifying body Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making”.

The Development Plan - strategic policies

- 3.5 To meet the Basic Conditions the neighbourhood plan must be in general conformity with the strategic policies of the development plan. The development plan comprises the saved policies of the Wrekin Local Plan 1995-2006 and the Telford & Wrekin Core Strategy 2006-2016. The adopted Local Plan is now time-expired and the Core Strategy is increasingly out of date, though retains some relevant strategic policies.
- 3.6 The difficulty the plan's drafters faced was that the adopted Local Plan (time-expired) and, together with the Core Strategy, is being replaced by the emerging Local Plan, which is now at an extremely advanced stage (indeed it is due to be adopted next month). The neighbourhood plan steering group had therefore taken the approach of preparing its policies in the context of - and alongside - the emerging plan, though it is now advancing very slightly ahead of it. I have therefore followed the advice in the Guidance: *"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..." Paragraph: 009 Reference ID: 41-009-20160211.*
- 3.7 I have thus had regard to Technical Paper B2f - Rural Settlements - and the relevant strategic policies of the emerging Local Plan including policies SP3 and 4, EC3, HO5 and 10, BE1 and NE1. I have had particular regard to:
- Policy SP3 is the spatial strategy for the rural area; and
 - Policy HO10 supports a limited amount of infill housing in five key rural settlements of which Edgmond is one. The policy does not define infill.

- 3.8 Given the Local Plan is to be adopted in January I am content to leave all references to it in the neighbourhood plan's policies and in the text.

4. The neighbourhood plan and its policies

- 4.1 The Edgmond Parish Neighbourhood Plan is a succinct and well-laid out document. It will however require chapter and paragraph numbering to enable proper usage as part of the development plan. Following clearly explained contextual chapters the body of the plan opens with an overarching vision followed by sets of plan objectives under each of the five policy headings - which neatly sit on one page. While the tone of the vision statement could be read as somewhat protectionist it is concerned with strengthening the resilience of the community; and the policies are supportive of some growth, albeit the first objective is to "allow" rather support infill development. Nevertheless I have concluded that the plan does promote sustainable development. The plan does not involve excluded development.
- 4.2 After the five policy sections the plan contains a summary policy map, a chapter on Monitoring and Review and finally three appendices. The policy map on page 31 needs a title and scale (or at least printed to display them). The appendices in my view will not be necessary once the plan is made: appendix 1 is already well summarised in the body of the plan; appendix 2 is background material and will quickly date; appendix 3 is also background but is the most useful of the three, if retained. The final section - additional technical evidence - can be removed, as it is simply a background reference list.

Housing

- 4.3 **Policy RES1** is concerned with residential development in Edgmond village. It supports new housing development on suitable infill sites. While no definition is given of "infill" this in my view should not pose a burden on its application (in much the same way as it would be for the new Local Plan). The key issue raised by the policy is its limitation to 1-3 dwellings. While I see local concerns expressed over potentially large-scale development I find no evidence to support this particular limitation and **recommend** the words "of 1-3 dwellings only" be deleted. The Borough Council objected to the same point. I believe it will be possible to apply the policy sensibly and appropriately to the local circumstances.
- 4.4 **RES2** is concerned with housing development beyond the village of Edgmond. I have concerns about the structure of this policy in two respects: the reference to exception sites would sit logically within RES5; and, as Harper Adams University is not a settlement and is covered by a specific policy in the draft anyway, it has no place here. I therefore **recommend** that the whole of the last sentence ("In accordance with ...") be deleted.
- 4.5 The remainder of the policy lacks clarity in relation to the status of Edgmond Marsh and HAU (which is not a settlement) and do not fall within RES1 or the objective of the policy itself, which is to restrain housing development in the rural areas, other than the named settlement in RES1, in line with strategic policy. The policy also needs to be expressed in less blanket-restrictive terms to meet the Basic conditions.
- 4.6 I therefore **recommend** two modifications:
- I. The opening words "preserve the current" be replaced with "safeguard the"
 - II. Delete the remainder of the sentence after "open countryside" (ie. ...around Edgmond village ...).
- 4.7 **RES3** deals with the design of new housing, setting out nine criteria. For clarity I **recommend** that the all the bullet points be changed to letters or numerals to aid referencing in application.
- 4.8 A number of representations referred to the value of referencing the specially commissioned Landscape Character Assessment. I consider the document to be a competently prepared appraisal that includes a set of guidelines that would be helpful in applying this policy. As it is not necessary to include it to meet the Basic Conditions and it is not apparent that it was the intention of the policy drafters to include it, I suggest that the supporting text could make reference to the guidance found at 9.9-.12 and usefully import those sections as an appendix.
- 4.9 **RES4** is concerned with conservation of Edgmond's historic character. To ensure consistency with the relevant legislation, I **recommend** that the word "protect" in the opening line be replaced by "preserve". I suggest that the last sentence in the first paragraph of supporting text ("appendix 2 sets out ...") be deleted, for the reasons given earlier.
- 4.10 **RES5** concerns the type and tenure of housing. The drafting is quite muddled and lacks sufficient clarity to meet the Basic Conditions. I **recommend** the following modifications:

- i. Rephrase the first line as - "Homes for smaller households, suited to the younger and older generations, will be supported."
- ii. Delete "and likely price" from the next sentence as this is not a relevant planning consideration for the policy
- iii. Include the reference removed from RES2, above.

Local Amenity and Green Spaces

- 4.11 **Policy G1** designates five areas as Local Green Space, listed within the policy and shown on Fig 4. The supporting Table 1 sets out some details of each area together with notes on special qualities/local significance. While the notes reflect local consultation response generally I have to say that the details fall somewhat short of what is required by the Framework in paragraphs 76 and 77, especially in justifying why each is demonstrably special.
- 4.12 I am satisfied that all are local in character and are in close proximity to the community they serve. Two are located in the Conservation Area (church field and School land) but only the former is identified as "key" in the CA Appraisal. The church land I conclude does comply with the criteria in the Framework. Curiously, the churchyard is also identified in the Appraisal but is not included in the list in G1.
- 4.13 The School buildings occupy also a significant area of the latter. I find limited evidence that the school lands are demonstrably special or have any particular qualities that are distinct from the neighbouring field, for example, beyond their significance to the school. Whereas, the other recreation spaces - the Playing Field, Children's Play Area and Village Field - are more obviously of value to the local community as the consultation responses indicate. The evidential support, to comply with the Framework, remains somewhat marginal. However on balance I have concluded that all these spaces fulfill the criteria in the framework sufficiently.
- 4.14 There are some mapping issues with Fig 4 in that the green wash covers some substantial buildings in two cases. In my view the school and village hall structures should be removed from the designated areas and clearer mapping of the green spaces be shown on a revised Fig 4.
- 4.15 I **recommend** that Fig 4 be modified to remove the buildings from the designations on both the School Lands and Village Field sites.
- 4.16 Policy G2 concerns ecology and landscape. For clarity, to meet the Basic Conditions, I **recommend** the following modifications:
- i. In the first line the word "high" be replaced with "significant"
 - ii. The second sentence be relocated to G3 which is more logical
- 4.17 For my **recommended** modification to Policy G3 see ii above.

Employment

- 4.18 There are three policies:
- 4.19 **Policy E1** concerns small-scale employment development. This is supportive of small-scale employment and is protective of the current stock unless no longer viable or, if the alternative provides demonstrable benefits. The Borough Council is

concerned that the latter part runs counter to emerging Local Plan Policy HO10, which supports conversion of employment uses to residential in named settlements such as Edgmond. However, there is clear local support for the particular approach being taken; and I'm not convinced that the Borough Council's policy can be considered strategic.

- 4.20 The final bullet of the policy seems to be internally contradictory - I **recommend** that the word "employment" be deleted.
- 4.21 **Policy E2** concerns tourism and leisure development.
- 4.22 **Policy E3** relates specifically to Harper Adams University (HAU). The University is a significant institution in the parish and has a national reputation. It is a dynamic university with a strategic plan to continue growing. The university occupies a large site - relative to the local geography - in open countryside and the policy seeks to limit the scope and scale of future development. The policy attracted the most representations, mainly related to the location and scale of growth. HAU are supportive.
- 4.23 The policy seeks to limit new development within "the existing boundary" and refers to a "Development Boundary" as shown on Fig 5; new development is to be "appropriately designed and located". The latter part of the policy seeks to manage the resulting traffic.
- 4.24 The supporting text (p 27) asserts that the plan is "establishing a boundary" around the university; while Appendix 1 suggests this has already been agreed "in discussion" with the Borough Council. But I find no supporting evidence that the plan does "establish" a boundary through some form of appraisal process; nor is there is a site assessment to help me judge the suitability of the boundary, which is drawn very widely around the developed areas. Further, the expression "existing" in the policy itself does not sit comfortably with the facts on the ground - the boundary lies well beyond the developed areas. In response to my written query the Parish and Borough Councils explained that Fig 5 was supplied by the university, based on their ownership. It seems to be the university's view of what the development boundary should be.
- 4.25 The representations concerned the limited degree of control over expansion afforded by the plan, with a focus on two main aspects: the need to limit expansion south of the B5062; and that larger (two storeys or more) be restricted to the northern part. Some representations are also concerned about the university's impact on light pollution. From my site visit I found support for the points raised, notwithstanding the need for recognising the importance of the institution to the parish. The recent Gladman appeal (ref APP/C3240/17/3170037) also highlighted sensitivity surrounding southern expansion towards the village. The Landscape Character Assessment contains guidance for the university site (at 9.12).
- 4.26 The thrust of strategic policy - and indeed this neighbourhood plan - is to restrain growth in the rural areas beyond Edgmond village itself and to limit expansion into the open countryside. It seems to me that in and immediately around the existing developed areas of the HAU campus there is considerable scope for expansion without necessarily extending to the boundaries shown on Fig 5, which, in my view, would run counter to those objectives.
- 4.27 Given the size of the HAU site and the scale of development aspirations set out in

the university's strategic plan I find the drafting of Policy E3 ineffective in controlling the degree of inappropriate expansion that could come forward. The expression "appropriately designed and located" is too vague to be effective on such a large site and does not, in my view, meet the Basic Conditions. Nor does the attempt to deal with potentially significant traffic impacts through how they will be "managed" - rather than mitigated, for example.

4.28 Given the deficiencies I have identified I **recommend** that Fig 5 be deleted (along with consequential modifications to the plan's mapping and text; I have already suggested the removal of Appendix 1. The policy needs to be modified to focus new development more closely around the existing developed areas, concentrate expansion - especially involving larger buildings - north of the Shrewsbury Road and deal with adverse impacts of new development through design, landscape, lighting and traffic mitigation measures.

4.29 I **recommend** that Policy E3 be modified to read:

All new University development will take place in and immediately around the existing developed areas of the HAU campus; in particular buildings of more than two storeys (or equivalent) will be located north of the B5062. New development will be expected to deal with adverse impacts through design, landscaping and lighting mitigation measures. Traffic impacts will be mitigated through a sustainable travel plan appropriate for the University's location.

4.30 I further **recommend** that the supporting text be modified as follows:

The Local Plan promotes the importance of the university in policy EC3 and the Neighbourhood Plan policy seeks to accommodate this whilst seeking to protect the character of the Parish by limiting expansion into the open countryside thereby recognising both its local importance and potential impacts.

The Parish Council supports the joint development of further detailed guidance by the Parish Council, HAU and Telford & Wrekin Council for development at HAU. This will build on the findings at para 9.12 of the Edgmond Neighbourhood Plan Landscape Character Assessment and will consider for example; clear criteria for location, development boundary, design, landscape impact, lighting impact and traffic impact mitigation criteria.

Community Amenities

4.30 **Policy C1** is concerned with protecting local community facilities. To meet the Basic Conditions, it would be clearer if the facilities were listed in the policy, rather than within an appendix (which isn't necessary for the plan once made, in any event). I **recommend** therefore that the facilities listed on page 43 be inserted into the policy in place of the current cross-reference to Appendix 3.

4.31 **Policy C2** is concerned with developer contributions. A number of representations objected to this. Not only is it expressed in very vague terms ("Wherever appropriate ...") but, given the scale of development anticipated in the plan I cannot see that it is justified; in my view it does not meet the Basic Conditions. I **recommend** Policy C2 be deleted.

5 Referendum Area

- 5.1 Planning Practice Guidance on the Independent Examination (Paragraph: 059 Reference ID: 41-059-20140306) says:

“It may be appropriate to extend the referendum area beyond the neighbourhood area, for example where the scale or nature of the proposals in the draft neighbourhood plan or Order are such that they will have a substantial, direct and demonstrable impact beyond the neighbourhood area.”

- 5.2 The plan has no site allocations and is concerned with general policies that affect a small rural parish. I conclude that the impact of the plan’s policies would not have a *substantial, direct and demonstrable impact* beyond the plan area and I therefore **recommend** that the referendum area be the same as the parish – the designated area.

6 Conclusions and recommendations

- 6.1 I can see that the Parish Council and its volunteers have put in a great deal of hard work into the submission of the plan and the supporting documents. The plan is well presented and clear; and seeks to represent the local community’s aspirations, which it does well.
- 6.2 From my examination of the submitted Edgmond Parish Neighbourhood Plan, together with the supporting documents, including having regard to all the representations made, I have **concluded** that the making of the plan will meet the Basic Conditions, if modified as I recommend.
- 6.3 I also **conclude** that the legal requirements are met.
- 6.4 In conclusion, I **recommend** that the Edgmond Parish Neighbourhood Plan should proceed to referendum. I **recommend** that if the plan does proceed to referendum then the referendum area should be that of the parish, the designated area. I have set out my conclusions more fully, drawn from the findings in my report, in the Summary on page 2.

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