

## Middleton St George Parish Council Response to Comments on the Submission Draft Middleton St George Neighbourhood Plan Plan

Responses received from: Coal Authority, Darlington Borough Council (Planning Policy), Darlington Borough Council (Estates), Environment Agency, Gladman Developments, Historic England, Middle Oak Management, National Grid, Natural England, North Yorkshire County Council, A F Pallister, Storey Homes, and M Stratford. Only those comments recommending changes to the plan are included in the table.

Consultee	Comment	Middleton St George Parish Council Response
<b>General</b>		
DBC (Planning Policy)	<p>I have reviewed the Middleton St. George Neighbourhood Plan Submission Draft and the comments previously submitted to the Parish Council on the Pre Submission Draft in November 2020 largely still apply. It is acknowledged that a number of changes have been made to the Neighbourhood Plan which address some of the issues, however the concerns raised with regards to the conflict with the emerging Local Plan and Local Green Space designations still stand.</p> <p>In terms of the emerging Local Plan, it is appreciated that the Neighbourhood Plan should be prepared to be in accordance with strategic policies of the existing development plan and strategic issues are a matter for the Local Plan. It is considered that the Neighbourhood Plan could proceed to be made in its current form, nonetheless, it is anticipated that parts would become out of date quite quickly once the emerging Local Plan is adopted.</p> <p>Adoption of the Local Plan is anticipated by January 2022. The Council has recently gone out for consultation on main modifications which are required to make the plan sound, as indicated by the inspector carrying out the examination. The consultation ends on the 30th November 2021. No further hearing sessions have been scheduled, unless the inspector considers it essential to deal with substantial issues raised in</p>	<p>Whilst these comments are noted, the parish council submitted the plan on 13 April 2021. At which point the local plan was not adopted. It was not certain that those issues where there was conflict would be found sound through the examination process.</p> <p>Agree there is a need for appropriate <b>amendments</b> to reflect the current NPPF.</p>

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	<p>representations about the proposed main modifications, or to ensure fairness.</p> <p>A revised version of the NPPF was published in July 2021. This was following the submission of the Neighbourhood Plan in April 2021. Some minor amendments may need to be undertaken to the Neighbourhood Plan to ensure consistency with the revised version of the framework.</p>	
A F Pallister	Expresses concern over potential development to the west of Station Road.	<b>No change.</b> The submitted neighbourhood plan does not propose development to the west of Station Road.
<b>Policy MSG1: Sustainable development</b>		
DBC (Planning Policy)	Policy MSG1: Sustainable Development criteria h states, 'Ensure that all infrastructure necessary to make the development acceptable in planning terms is either in place or can be provided prior to the development being brought into use.' The wording of this criteria should potentially be amended as the implementation of infrastructure on major development schemes can be phased and not necessarily implemented prior to the development being brought into use.	<b>Amend as suggested.</b>
<b>Policy MSG2: Design</b>		
Galdman Developments	<p>This policy sets out a range of design principles which development proposals should seek to meet. While the government has shown support for development to incorporate good design principles, Gladman would note that the Framework also states:</p> <p>"To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design</p>	<b>No change.</b> MSGPC does not consider the policy is overly prescriptive.

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	<p>guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.”</p> <p>Whilst Gladman recognise the importance of high-quality design, in accordance with the requirements of the Framework, design principles should be set out through appropriate frameworks and design guides rather than an overly prescriptive list within the Plan.</p> <p>Policies require some flexibility in order for schemes to respond to site specifics and the character of the local area. In essence, there will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles.</p>	
Story Homes	<p>Story Homes have previously made comments on Policy MSG2: Design relating to the potential duplication of guidance between the draft Neighbourhood Plan and the adopted Design of New Development Supplementary Planning Document (July 2011). Whilst Story Homes are pleased to see that some small amendments have been made to this policy to allow for greater flexibility when bringing forward high-quality new development, it is frustrating to see that our comments have not been incorporated.</p> <p>As a starting point, and as noted in our previous representations, Story Homes aligns with the Neighbourhood Plan in its</p>	<p><b>No change.</b> As explained within the consultation statement, the design code was prepared as part of the governments technical support package for neighbourhood planning group. Many made neighbourhood plans include design codes as annexes to the plan and refer to them within design policies. It is entirely appropriate for a design code to form part of a neighbourhood plan, even where borough wide design guidance is being prepared. Should the design code become out of date, MSGPC will consider if there is a need to revise the neighbourhood plan.</p>

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	<p>suggestion that future development should priorities high-quality design which respects and enhances local character and identity. Story Homes shares these values and seeks to incorporate visual distinctiveness and local character where possible and where appropriate. Which can be seen at our Paddocks View development.</p> <p>Story Homes reiterates its concerns over the inclusion of a Design Code within the Neighbourhood Plan as an appendix to the document. As noted in our previous representation, Darlington Borough Council currently have an adopted Design SPD; Design of New Development Supplementary Planning Document (adopted July 2011). At the time of submission of these representation, November 2020, it was considered that the Borough Council would be updating this SPD with the view to releasing an updated version Summer 2021. An updated version of this document has not yet been released, due to the impacts of COVID-19 on the SPD's preparation.</p> <p>Notwithstanding this, Story Homes overarching concerns as to the potential duplication of designrelated guidance remains. In the opinion of Story Homes, the adopted Design SPD sufficiently provides guidance as to the design characteristics of Middleton St George and the ways in which it is to be respected and enhanced through future development. Story Homes considers it unnecessary for the two sets of design guidance to exist and notes that it will cause confusion and unduly delay within the decision-making process for any future planning applications made in Middleton St George.</p> <p>Story Homes is of the view that the Neighbourhood Plan should reference the Darlington Council Design of New Development SPD, as opposed to the Design Code attached to the</p>	

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	<p>Neighbourhood Plan. However, there remains the issue of timescales even if the Councils SPD is referenced. Given that the Neighbourhood Plan is at an advanced stage and the review of the SPD is yet to take place, there is a risk that the Neighborhood Plan could be considered out-of-date when this SPD is updated. Story Homes would encourage the Neighbourhood Plan Group to align more closely with the Councils Local Plan and Supplementary Planning Documents preparation in order to avoid this risk.</p> <p>Basic Conditions Test:  Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because:  d) the making of the order contributes to the achievement of sustainable development:  The Design Code appended to the Neighbourhood Plan does not provide any substantial additional guidance which is not already included within both the Neighbourhood Plan and the adopted Design of New Development Design SPD (July 2011). The Design Guide, in its current form, does not meet basic conditions test, it will not enable a more sustainable form of development which responds to local character to come forward, than would have been brought forward under adopted policy.</p> <p>Recommendation:  It is considered preferable for the Design Code to be omitted from the Neighbourhood Plan, however, if the Parish Council think it necessary to retain there should be a deletion of repetitive policies across both the Neighbourhood Plan and the Design Code. There should also be more detailed consideration given to the matters dealt with in the already adopted Design SPD to ensure repetition is avoided. Any detailed design policies included within the Neighbourhood Plan Design Code should be</p>	

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	suitable evidenced so as to not compromise the effectiveness of the Neighbourhood Plan.	
<b>Policy MSG3: Embedding energy efficiency and renewable energy</b>		
Gladman Developments	<p>The Qualifying Body should review this policy in detail to make sure its requirements are not already covered by other legislation such as Building Regulations and/or policies already in the Local Plan.</p> <p>In many instances there are no 'baseline' figures to measure against in this policy and as such, and noted above, much of this is already covered in Building Regulations requirements, principally in Part G and Part L.</p>	<b>No change.</b> MSGPC consider that the proposed policy is appropriate and meets the basic conditions for the reasons set out within the submitted basic conditions statement.
<b>Policy MSG4: General location of new development</b>		
DBC (Planning Policy)	<p>The main inconsistencies with the emerging Local Plan are the proposed housing allocation, site ref 99 Maxgate Farm, MSG and the proposed rural gap designation between Middleton St. George and Middleton One Row. The proposed housing allocation has not been included within the Submitted Neighbourhood Plan via the proposed development limits, although it is appreciated that this is still an emerging allocation.</p> <p>For clarification the associated policies (H2 Housing Allocations and ENV3 Local Landscape Character) are strategic policies in the emerging Local Plan. It is understood that any inconsistencies between the two plans can be resolved through the nature of the policies involved (whether or not they are strategic) and the date at which they became part of the development plan. The Council consider that if the conflict could be resolved this would prevent potential future confusion with regards to these policy areas but</p>	<p>The neighbourhood plan was submitted for examination on 13 April 2021, at which point the examination into the local plan was not complete. MSGPC and others put forward a strong case that the Maxgate Farm did not meet the tests of soundness.</p> <p>As the local plan has been adopted and the Maxgate Farm site has been retained, it is accepted that elements of the neighbourhood plan will need to be <b>amended</b>, namely the settlement boundary. However, it is not agreed that the Maxgate Farm site should be allocated within the neighbourhood plan.</p> <p>Agree that <b>amendment</b> is required to ensure policy MSG4 accords with the requirements of the updated NPPF.</p>

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	<p>appreciate that it is not necessary to proceed with the Neighbourhood Plan in its current form. Any inconsistencies could also be addressed via a review of the Neighbourhood Plan at a later date.</p> <p>In terms of policy MSG4: General Location of New Development, the word 'innovative' should be removed from criteria e to ensure consistency with paragraph 80 of the NPPF. It may also be required for the policy to place more emphasis on new build economic development beyond settlement limits to ensure the policy is in line with the NPPF. The framework states how well designed new buildings can support the sustainable growth and expansion of all types of business in rural areas. Criteria C also suggests that some form of needs assessment is required for leisure development outside of the development limits. This is not considered to be consistent with the NPPF and therefore would recommend removal.</p>	<p>The issue of the rural gap/ green wedge is addressed under policy MSG6.</p>
<p>Gladman Developments</p>	<p>Policy MSG4 supports the focus of new development within the settlement boundaries of Middleton St George, Middleton One Row and Oak Tree. Several scenarios are listed whereby new development will be supported outside the defined settlement boundaries; however, this fails to account for new major residential developments.</p> <p>Gladman object to the wording of this policy and use of settlement boundaries as an appropriate planning tool where they would preclude otherwise sustainable development from coming forward. Indeed, the use of development limits which arbitrarily restrict suitable development on the edge of settlements does not accord with the positive approach to growth required by the Framework which is clear that development which is considered sustainable should go ahead</p>	<p><b>No change.</b> As explained within the submitted consultation statement, MSGPC submit that the use of settlement boundaries is an established tool in guiding the location of development. Also, that the proposed settlement boundaries will support the sustainable growth of the parish and protect the open countryside from unsuitable development, in accordance with the requirements of the NPPF.</p>

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	<p>without delay in accordance with the presumption in favour of sustainable development. As a result, this approach is also contrary to basic condition (a).</p> <p>Gladman contend that this policy should be worded more flexibly in accordance with Paragraphs 11 and 16(b) of the NPPF (2021) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively.</p> <p>It is suggested that Policy MSG4 should support development proposals adjacent to the settlement boundaries provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development alongside according with other policies of the MSGNP and other development plan policies.</p> <p>Indeed, a flexible policy approach for developments adjacent to a settlement boundary was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report (August 2017) states:  “...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”</p> <p>Gladman would suggest this policy is going to prevent sustainable development from coming forward and not allow</p>	



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	<p>appropriate flexibility to ensure an appropriate level of housing is delivered for the neighbourhood plan area in supporting the (emerging) Darlington Borough Local Plan.</p>	
<p>Story Homes</p>	<p>Story Homes have previously raised concern with Policy MSG4 and the fact that the Neighbourhood Plan does not align or accord with the proposed allocations and disaggregation of growth made in the emerging Darlington Local Plan.</p> <p>At the time of submitting our previous representations to the pre-Submission Draft Neighbourhood Plan, the Darlington Local Plan was due to be submitted for independent examination to the Secretary of State. The Local Plan has now been submitted and the Examination Hearings have been held. The Local Plan is currently out for Main Modifications consultation until the end of November 2021. Story Homes considers that the weight to be afforded the emerging Local Plan is arguably more significant from when the pre-Submission draft Neighbourhood Plan was released 12 months ago. As such, the proposed allocations for Middleton St George should be reflected within the Neighbourhood Plan.</p> <p>It is concerning that the Neighbourhood Plan, nor the associated Policies Map, depicts the draft allocations which have been suggested through the emerging Local Plan. Given the Darlington Local Plan is currently at Main Modifications stage and participants have had the benefit of an Interim Position letter from the Inspector (made publicly available), Story Homes considers it appropriate for these sites to be included within the Neighbourhood Plan in order to align with the wider Development Plan. As seen within the Local Plan Inspectors Interim Note, there are no proposed modifications to the draft allocations in Middleton St George, nor the settlement boundary</p>	<p>The neighbourhood plan was submitted for examination on 13 April 2021, at which point the examination into the local plan was not complete. MSGPC and others put forward a strong case that the settlement boundary proposed within the neighbourhood plan was that which was required to support sustainable development.</p> <p>As the local plan has been adopted and the Maxgate Farm site has been retained, it is accepted that elements of the neighbourhood plan will need to be <b>amended</b>, namely the settlement boundary. However, it is not agreed that the Maxgate Farm site should be allocated within the neighbourhood plan.</p> <p>Furthermore, MSGPC consider that the evidence base supporting the submitted neighbourhood plan do not require updating as they support the position at the time of submission of the plan, almost 1 year ago.</p>

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	<p>itself. As such Story Homes encourages the Neighbourhood Plan Group to align as close as possible to the emerging Darlington Local Plan.</p> <p>As noted within our previous submissions and remains true in the Submission Version of the Neighbourhood Plan, the Development Limits shown on both the Neighbourhood Plan Policy Map and the emerging Local Plan Policy map do not align. It is concerning that within the Neighbourhood Plan the Development Limit follows the pattern of built development around the settlement, with an inclusion of permitted development. Whereas the emerging Local Plan includes the emerging allocations within the Development Limit. Story Homes considers that the two documents should align, with the Neighbourhood Plan taking lead from the emerging Local Plan.</p> <p>It should also be noted that through the Middleton St George Neighbourhood Plan Settlement Boundary Background Paper (January 2021) the site within Story Homes control, Land at Station Road (ref: site 99) is still stated as being constrained by flood risk, access, infrastructure and heritage (paragraph 4.10).</p> <p>Story Homes have previously disagreed with this assessment and continue to reiterate this point. The assumptions made within the Settlement Boundary Background Paper does not reflect the technical work undertaken by Story Homes nor does it reflect the conclusions reached by Darlington Borough Council in assessing the site for residential development. Land at Station Road is being brought forward as a draft allocation through the emerging Darlington Local Plan and is considered to be suitable, sustainable and deliverable for residential development. The Settlement Boundary Background Paper is clearly incorrect in its</p>	

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	<p>conclusions and as such cannot be relied upon as part of the evidence base documents for the Submission Version Neighbourhood Plan. Once again, Story Homes considers that the evidence base presented by the Neighbourhood Plan Group is flawed and inconsistent with that produced by Darlington Borough Council. Story Homes encourages the Neighbourhood Plan to align with the emerging Local Plan on its assessment of spatial disaggregation and suitability of allocated sites.</p> <p>There remains a clear discord between the Submission Version Neighbourhood Plan and the emerging Darlington Local Plan. Either the Neighbourhood Plan is based upon a previous version of the emerging Local Plan, or the Neighbourhood Plan do not wish to acknowledge the emerging allocations made within the settlement. Both of these indicate that the Neighbourhood Plan fails to meet basic condition (e) and guidance contained within the Planning Practice guidance (PPG) at paragraph 74 (Reference ID: 41-074-20140306). This is set out clearly below.</p> <p>There is a clear risk to the Neighbourhood plan that in refusing to align with the emerging Darlington Local Plan that the Neighbourhood Plan will be rendered obsolete at the time of adoption of the Darlington Local Plan. This will significantly limit the weight which can be attributed to the Neighbourhood Plan in decision making. In order to avoid this, Story Homes encourages the Neighbourhood Plan Group to align with the emerging Darlington Local Plan both in content and production timescales.</p> <p>Basic Conditions Test:  Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because:</p>	

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	<p>e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area):</p> <p>The Policies map could undermine the effectiveness of housing allocations as made in the emerging Darlington Local Plan, this may then have a negative effect on housing delivery within the settlement and Borough.</p> <p>Recommendation:</p> <p>In order to ensure that the Neighbourhood Plan can continue to referendum, and aligns with the basic conditions, it should be updated to reflect the policies made in the Submission draft Darlington Local Plan. This includes the methodology and analysis of allocations made in the settlement. Land at Station Road is considered suitable, sustainable and deliverable as proven through its draft allocation within the emerging Darlington Local Plan.</p> <p>In addition to this, Story Homes also implore the Neighbourhood Plan Group to ensure that guidance and evidence base documents reference the most up-to-date version of the emerging Darlington Local Plan. It is critical that the Neighbourhood Plan aligns with the most up-to-date version of the emerging Local Plan in order to be considered robust and effective. This includes making amendments to the Polices Map in order to show the Development Limits in the correct location which considers the emerging housing allocations and committed development parcels.</p>	
<b>Policy MSG5: Green infrastructure</b>		
DBC (Planning Policy)	The final paragraph of MSG 5: Green Infrastructure Development does not seem appropriate for that designation. It would be	The land identified is considered by MSGPC to be part of the important green infrastructure of the parish. Paragraph 175

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	<p>more suitable for an open space designation. Areas of agricultural land are proposed for green infrastructure and if they were to be developed it would not be expected for this type of use to be re provided. It is suggested that this final paragraph is removed.</p>	<p>of the NPPF refers to plans maintaining and enhancing networks of habitats and green infrastructure. In accordance with this, policy MSG5 seeks to do this. An error has been identified with the GI designation adjacent to LGS01 – this should have the same boundary as the LGS site – it should not extend to the east including part of the community centre. An <b>amendment</b> is considered necessary.</p>
<p>Gladman Developments</p>	<p>Gladman support the delivery and retention of Green Infrastructure. New developments are well placed to provide new and improved areas of Green Infrastructure. This should be recognised in the policy and supported through the other policies in the Neighbourhood Plan.</p> <p>Gladman further remind the Qualifying Body that it is not the responsibility of the Neighbourhood Plan to determine planning applications and recommend that the Policy Wording is amended to state:  “Development proposals which provide the following measures will be supported...”</p>	<p><b>No change.</b> The policy clearly states that new development should seek to protect and where practical improve and extend the green infrastructure network.</p> <p>The neighbourhood plan will form part of the development plan; therefore it is appropriate for the policy to set out where development proposals would be supported.</p>
<p><b>Policy MSG6: Green wedge</b></p>		
<p>DBC (Planning Policy)</p>	<p>The Neighbourhood Plan also proposes a wider area as green wedge between the two settlements. Whereas the Local Plan proposes a more confined area designated as a rural gap which reflects the landscape area identified most sensitive in terms of retaining the existing settlement pattern, openness, landscape setting and separate distinctive identity of the settlements by avoiding coalescence and also avoiding designating extensive tracts of land. The Council only recently plotted the rural gaps on the policies maps through the process of the examination and</p>	<p>It is accepted that the different terminologies used in the local plan and neighbourhood plan could lead to confusion. As the local plan has now been adopted, MSGPC accepts that it would be appropriate for the neighbourhood plan to adopt the same terminology, an <b>amendment</b> is considered appropriate. However, it considers the extent of the proposed allocation to the east to be appropriate as it has been informed by the Middleton One Row Conservation Area Character Appraisal as well as the design code. It is</p>

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	<p>therefore it was not possible for the Parish Council to consider this through the development of their plan. The difference in terminology could lead to some confusion between the two plans. The Council considers that rural gap is the more appropriate term given its main purpose (to retain the separation between the built areas).</p> <p>For clarification the associated policies (H2 Housing Allocations and ENV3 Local Landscape Character) are strategic policies in the emerging Local Plan. It is understood that any inconsistencies between the two plans can be resolved through the nature of the policies involved (whether or not they are strategic) and the date at which they became part of the development plan. The Council consider that if the conflict could be resolved this would prevent potential future confusion with regards to these policy areas but appreciate that it is not necessary to proceed with the Neighbourhood Plan in its current form. Any inconsistencies could also be addressed via a review of the Neighbourhood Plan at a later date.</p>	<p>noted that the rural gap contained within the local plan extends further west than that proposed within the neighbourhood plan. MSGPC consider it to be appropriate for the designation to be extended to the west to reflect the local plan.</p>
Gladman Developments	<p>The emerging Darlington Borough Local Plan, which is currently consulting on Main Modifications following Examination in Public, does not propose a strategic settlement gap for Middleton St George.</p> <p>As highlighted in the PPG, a draft Neighbourhood Plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic conditions. It is also clear the above Policy is drafted to avoid coalescence between Middleton St George and Middleton One Row, Gladman consider that this is a strategic issue that should only be considered through the Local Plan process.</p>	<p><b>No change.</b></p> <p>When the neighbourhood plan was submitted for examination almost a year ago, the detailed boundaries of the rural gaps proposed within the local plan had not been defined.</p> <p>MSGPC consider it is appropriate for the neighbourhood plan to consider issues such as the coalescence between settlements, as well as identifying it as an important wildlife corridor and valued part of the landscape which contributes to the significance of the Middleton One Row Conservation Area. It is submitted that the proposed green wedge is supported by robust evidence and disputed that the</p>

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	<p>Furthermore, if the Neighbourhood Plan is to proceed with Policy MSG6 then it must be supported by robust evidence, as set out in the PPG, allowing for flexibility to assess any harm to the visual and functional separation of settlements against the benefits of a development proposal:</p> <p>“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.”</p> <p>The Council have referred to the 2010 Middleton One Row Conservation Area Character Appraisal, before listing two planning applications as evidence to justify Policy MSG6. Firstly, Gladman contend that the Conservation Area Character Appraisal is dated and does not provide robust or up-to-date evidence in which to form the basis of a policy. Furthermore, the justification listed within this document propose the area provides ‘key views’, yet Gladman propose that this is a subjective issue and is little beyond a ‘nice view of the countryside’.</p> <p>Secondly, Gladman refer to the two planning applications; 18/01108/FUL and 18/00275/OUT, detailed by the Parish Council as justification for the Policy. While the Inspector for the Appeal relating to Land east of Middleton Lane, Middleton Lane highlighted the local character and appearance of the local areas as attracting weight within the decision, these were not determinative issues when regarding plan making.</p> <p>While the Council have presented analysis behind Policy MSG6, Gladman contend that the Parish Council have not provided robust evidence supporting the approach taken. Indeed, the</p>	<p>conservation area character appraisal is out of date. The importance of the gap was highlighted in the design code.</p>

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	policy applies a blanket approach to restricting housing development where a development proposal may be designed in a manner that is able to mitigate against harm to the character and local appearance.	
<b>Policy MSG7: Biodiversity</b>		
DBC (Planning Policy)	With regards to policy MSG7: Biodiversity it is noted that the 10% requirement does go above and beyond the more general net gains prevailing in national policy by setting a specific percentage. Although 10% is the mandatory requirement proposed in the Environment Bill so it would be consistent with this developing legislation. The Local Plan viability testing was also undertaken on the basis of a 10% requirement which was identified to be viable. It may also be useful to add in a reference to the policy that calculations should be based on the DEFRA biodiversity metric.	The amendments were made to the plan to reflect comments by Natural England to the pre-submission draft. MSGPC agree that it would be beneficial to <b>amend</b> the policy include reference to how to calculate a net gain e.g. 'Securing a net gain for biodiversity, as calculated to reflect current Government policy and advice'.
<b>Policy MSG8: Local green space</b>		
DBC (Estates)	As briefly discussed earlier the only site identified within the MSG Neighbourhood plan is the Haxby Road play area. I think it would be reasonable for the Council to seek for this not to be allocated as open space within the plan even though I recognise it is used as such at present and may not be required for an alternative use in the future. But at least it would provide the council with the flexibility going forward.	<b>No change.</b> The local green space and protected open space background paper explains how the Haxby Road Play Area is demonstrably important to the local community and meets the other tests of national planning policy and guidance.
DBC (Planning Policy)	There are still concerns with a number of the sites proposed for designation as Local Green Space in policy MSG8 as the Council considers that they do not meet the criteria of the designation in the NPPF, in terms of being special to the local community and	<b>No change.</b> MSGPC considers the reasons for designation are clearly set out within the local green space and protected open space background paper.



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	<p>holding particular significance. Most of the sites also have protection from other designations.</p> <p>Four of the sites are proposed in the emerging Local Plan (site ref LGS01, LGS10, LGS16, LGS17) and an additional site is proposed at Tower Hill, The Front, Middleton One Row which makes up a small part of site LGS06 in the Neighbourhood Plan. A number of the sites proposed were submitted for consideration for inclusion in the emerging Local Plan but were rejected as they did not meet the criteria and were not considered to be demonstrably special in their nature. Their consideration is detailed in the latest assessment available on the Council's website at:  <a href="https://www.darlington.gov.uk/media/12602/sd28-local-green-space-designation-report-2020-update.pdf">https://www.darlington.gov.uk/media/12602/sd28-local-green-space-designation-report-2020-update.pdf</a></p>	
Gladman Developments	<p>Policy MSG8 seeks to designate 17 areas as Local Green Spaces (LGS) and therefore protecting them from development due to their local significance or community value.</p> <p>In order to designate land as LGS the Parish Council must be able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. The Framework makes clear at §101 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development  "The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or</p>	<p><b>No change.</b> MSGPC consider that the evidence presented within the local green space and protected open space background paper fully details how the site meets the requirements of national planning policy and guidance, also its importance to the local community.</p> <p>The references to other neighbourhood plan examinations and what does and doesn't constitute an extensive track of land are not considered relevant. Whether a site is considered extensive is dependent on the size of the community in which it is situated. Extensive would mean very different things to a small rural village compared to a large urban area. MSGPC submit that the LGS11 is local in character and would not result in the blanket designation of open countryside.</p>

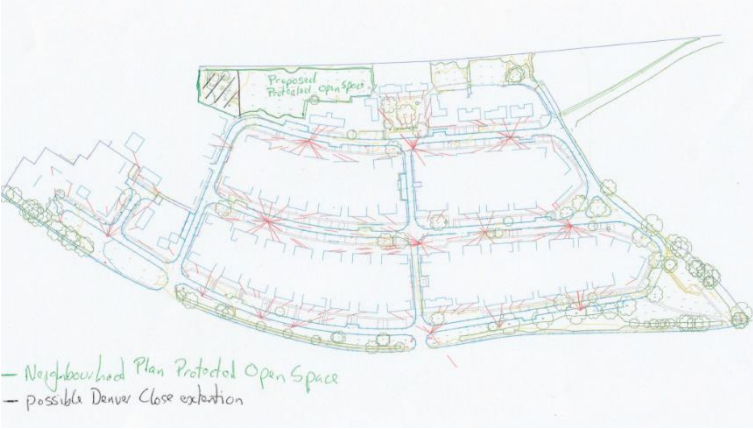
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	<p>updated and be capable of enduring beyond the end of the plan period.”</p> <p>Further guidance is provided at §102 of the Framework which sets out three tests that must be met for the designation LGS, stating:</p> <p>The Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> <li>a) in reasonably close proximity to the community it serves;</li> <li>b) 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), tranquillity or richness of its wildlife; and</li> <li>c) local in character and is not an extensive tract of land.</li> </ul> <p>Gladman contend that the Local Green Space and Protected Open Space – Background Paper does not provide proportionate or robust evidence as required by the PPG to designate such land. Failure to demonstrate how each designation meets the tests set out in §102 is contrary to the requirements of national policy and guidance and is therefore inconsistent with basic condition (a).</p> <p>The Parish Council is aware that Gladman Developments Ltd. has interests in the site proposed (in this Regulation 16 plan) as of ‘LGS11 The Fields Behind The Greenway and north of the railway line’.</p> <p>The assessment of LGS 11 is located on page 48 of the ‘Local Green Space and Protected Open Space Background Paper’ (January 2021). It is considered that the context of the site is ignored during the assessment of the site, particularly when at the time of the assessment there was a planning application awaiting determination and that the site was previously</p>	<p>The other issues are addressed in response to the submission by Gladman Developments to the pre-submission draft plan, within the submitted consultation statement.</p>

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	<p>proposed for allocation within the Darlington Local Plan. Indeed, evidence supporting the designation of 'LGS11 The Fields Behind The Greenway and north of the railway line' in the Background Paper provides limited justification for designating the site as LGS. Part 1 of the Background Paper states that the site is of particular local significance as it is 'well used by the local community' and has 'a number of public rights of way cross the site linking to the wider countryside'</p> <p>It is acknowledged that the site has public rights of way (PRoW) crossing it. However, in the illustrative Development Framework Plan submitted in support of application 19/00231/OUT (see Appendix 1) demonstrates that all PRoWs can be accommodated on-site without interruption or diversion. No further supporting evidence or documents demonstrating how the land is used by the community has been provided.</p> <p>Simply because a site has PRoW(s) crossing it or within its 'boundaries', does not mean it meets the requirements for a LGS and nor that development should be refused for this reason. Indeed, on the site immediately north of (proposed) LGS11, there is an outline planning permission for 198 dwellings (15/00976/OUT) and this site has the same (continuation) footpaths crossing it as on LGS11.</p> <p>Additionally, the NPPF makes it clear that LGS designations should not be an extensive tract of land. While there is no set figure for what constitutes an extensive tract of land there are numerous Examiner's reports from across the country which hold a consensus that anything greater than 2 hectares fails this test.</p> <p>The Examiner of Backwell Neighbourhood Plan found two proposed LGSs at Farleigh Fields and Moor Lane Field to</p>	

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	<p>constitute extensive tracts of land given their respective sizes of 19 and 32 hectares. Accordingly, the Examiner concluded that their proposed LGS designations had failed to show regard to national planning policy and required their removal.</p> <p>Indeed, the following Examiner’s Reports make similar points:</p> <ul style="list-style-type: none"> <li>• The Oakley and Deane NP (Examiner’s Report dated December 2015) – the Examiner concluded that a proposed LGS designation on a site of just over 5 hectares to be contrary to national planning policy.</li> <li>• The Wivelsfield NP (Examiner’s Report dated August 2016) – the Examiner concluded that proposed LGS allocations on sites of 3.6 hectares and 8.6 hectares. The Inspector pointed to PPG paragraph 13 which listed “sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” as potential LGS allocations. The Inspector stated the areas suggested are notably smaller than the fields promoted in the NP.</li> <li>• The Faringdon NP (Examiner Report dated August 2016) – the Examiner concluded that Humpty Hill at 5.6 hectares on the edge of the town was an extensive tract of land and it was subsequently deleted as a LGS allocation.</li> </ul> <p>The land proposed to be designated as LGS11 amounts to an overall size of approximately 15 acres, an area significantly greater than figures referred to previously and clearly an extensive tract of land. This proposed designation also would apply a blanket designation of open countryside adjacent to the existing settlement boundary and an approved residential application (15/00976/OUT).</p> <p>This is compounded by the fact that the site (Reference: 375 ‘Land south of High Stell’) was considered suitable, available and</p>	

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	<p>achievable for residential development in the Darlington Borough Council Housing and Employment Land Availability Assessment (HELAA 2017) published in 2018.</p> <p>Additionally, in the Regulation 18 Darlington Local Plan (June 2018) the site was proposed for residential development with an indicative yield of 100 dwellings.</p> <p>While, the site allocation is no longer included within the Local Plan, there is no further evidence which changes the assessment of the site and therefore can still considered suitable for residential development. Indeed, the emerging Local Plan process has not considered, nor assessed the site for LGS purposes further demonstrating inconsistencies with Basic Condition (e).</p> <p>Furthermore, the Darlington Borough Council’s Planning Policy Consultation Response stated that,  “It is considered that residential development on this site would not have a significant impact on the character and appearance of the countryside.”</p> <p>Finally, the Middleton St George Neighbourhood Plan: Settlement Boundary Background Paper states:  “Previous parish council responses to the pending application for the development of site 375 illustrate that there are significant access and highway infrastructure capacity issues. The proposed access to the site is not within the same ownership and would only be able to be provided at this point if number 20A The Greenway was purchased and demolished. It is also considered that the proposed access route does not and could not meet the council’s highway standards in terms of width of road to be provided and the provision of the required footpaths. Traffic</p>	

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	<p>survey data illustrates that the development of the site could cause result in significant highway safety issues.”</p> <p>At the time of the assessment, which was published alongside the Regulation 14 consultation, Gladman’s planning application to Darlington Borough Council, registered under reference 19/00231/OUT, did not have any highways objections relating to highways infrastructure or capacity. It is considered that the Parish Council predetermined the outcome of the planning application and development management process.</p> <p>The decision notice and delegated report highlight that the Tees Valley Highway Design Guidance specifies a carriageway width of 5.5m would be suitable to serve up to 300 dwellings. However, despite the existing internal highways of Grendon Gardens/The Greenway being only 5.4m it was considered that this makes little material difference in terms of highways safety. This contradicts comments highlighted in the Middleton St George Neighbourhood Plan: Settlement Boundary Background Paper.</p> <p>Therefore, Gladman assert that no robust or proportionate evidence has been provided alongside the draft Neighbourhood Plan which justifies the designation of LGS11 or any of the proposed LGS designations. Middleton St. George Neighbourhood Plan is consequently inconsistent with basic condition (a).</p>	
<b>Policy MSG9: Protected open space</b>		
Middle Oak Management	We welcome the revision of the Virginia Estate designation from all existing area of open space being Local Green Space to a Protected Area designation for the planning field. However, we would like to see the area covered reduced to the levelled,	<b>Amend</b> as suggested. MSGPC agree that it would be appropriate for the protected open space to be limited to the grassed and maintained area (the recreation area).

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	<p>grassed and maintained area, thus enabling the extension of Denver Close with additional accessible bungalows in the future.</p> <p>Throughout the Neighbourhood Plan process the problem for MOM Ltd has been the lack of engagement from the Parish Council's Consultant or the Parish Council itself... Had there been an approach the many mistakes and lack of awareness in the original document could have been avoided and a protected area of the playing field agreed.</p> <p>How should we approach seek to reduce the protected open space area to just the levelled grassed part?</p> <p>Attached estate drawing showing proposed protected space and the area we would like excluded to enable extension of Denver Drive bungalows in the future.</p> <p>We will accept either the current or amended proposals.</p> 	<p>MSGPC contacted MOM Ltd in advance of the consultation on the pre-submission draft plan to advise on the proposals regarding the Virginia Estate. MOM Ltd was then consulted on the pre-submission draft plan. The submission plan has been amended to reflect the feedback on the draft plan. MSGPC do not consider there has been 'many mistakes and lack of awareness'. Feedback was sought and the plan amended accordingly.</p>

Consultee	Comment	Middleton St George Parish Council Response
M Stratford	<p>1. Field at the back of Almora hall that goes west across to Roman road field path, bordered by new housing to the north</p> <p>2. Field to the south of this one above that is accessed by an alleyway off Church lane and bordered by Almora hall, houses on Hunters green and continuation of Roman road on to Church lane.</p> <p>I believe both of the above fields should be classified as POS as they provide a valuable amenity, have foot paths and most importantly continue the east west green split between Middleton st George and Middleton one row.</p>	<p><b>No change.</b> These sites (the parts which lie within the parish) were considered through the local green space assessment process. It was concluded that whilst they have historic importance and are well used for recreation, the routes would be better protected through other policies within the plan e.g. active travel (right of way) and the settlement boundary.</p>
<b>Policy MSG10: Heritage assets</b>		
Gladman Developments	<p>Gladman highlight that it is the sole responsibility of the Local Planning Authority to determine planning applications. Therefore, it is advised that the policy is deleted or that policy wording is amended to provide more suitable terminology.</p>	<p><b>No change.</b> The policy is written to identify the criteria that would be used to assess a relevant planning application by the decision maker, which could be the local planning authority, planning inspectorate or secretary of state.</p>
<b>Policy MSG11: Housing mix</b>		
DBC (Planning Policy)	<p>There appears to be a typing error in the first sentence of policy MSG11: Housing Mix. This should be resolved for clarity.</p>	<p><b>Amend</b> to remove typo (delete ‘include’)</p>
Gladman Developments	<p>Gladman are supportive of the flexibility contained within Policy MSG11 to ensure that the policy can remain up to date throughout the plan period.</p> <p>Policy MSG11 has regard to the Middleton St George Housing Needs Assessment (2020) and the Darlington Strategic Housing Market Assessment (2017) and any subsequent updates. However, Gladman recommend that reference is also given to the adopted development plan.</p>	<p><b>No change.</b> It is not considered necessary to cross reference to other development plan policies.</p>



Consultee	Comment	Middleton St George Parish Council Response
Story Homes	<p>Story Homes supports the Neighbourhood Plan Groups amendments to policy MSG11 and the inclusion of text which clearly aligns the Neighbourhood Plan policy with the emerging Darlington Local Plan. Specifically, the updated reference to the Darlington Strategic Housing Market Assessment (2020) which has been updated from the 2017 version.</p> <p>Story Homes would like to encourage the Neighbourhood Plan Group to align more closely with the emerging Darlington Local Plan as it has done so here so as to avoid issues surrounding the basic conditions test. However, Policy H4 within the emerging Local Plan will frame the basis for development coming forward in Middleton St George, with regard being had to the Neighbourhood Plan given that the emerging Local Plan sets a defined mix and expectations.</p> <p>It is considered that Policy H4 in the emerging Darlington Local Plan provides a sufficient framework with which the type and amount of residential development should be brought forward against. It is unclear if policy MSG11 in the Neighbourhood Plan adds a sufficient amount of detail to be considered effective and non-repetitive.</p> <p>Basic Conditions Test:  Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because:  e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area):  Policy MSG11 does not provide any substantial additional guidance which is not already dealt with through Policy H4 in the emerging Local Plan. The emerging policy suggests an indicative</p>	<p><b>No change.</b> It is not considered necessary to cross reference to other development plan policies, nor is there a need for the policy to be subject to viability testing.</p>

Consultee	Comment	Middleton St George Parish Council Response
	<p>housing mix, which the Neighbourhood Plan does not have regard to.</p> <p>Recommendation: It is suggested that the Policy MSG11 refer to emerging Policy H4 within the policy wording so as to align with the emerging Local Plan specifically. Regard can still be made to the Middleton St George Housing Needs Assessment (2020) and the Neighbourhood Plan should be updated to reflect any changes or reviews of the Darlington Borough Council SHMA (2020). In order to be considered effective and robust, MSG11 should provide clear and evidenced policy as opposed to the vague and nondescript guidance currently put forward. Story Homes suggests that the Neighbourhood Plan Group evidence this policy with a viability assessment in order to fully assess any implications for deliverability.</p>	
<b>Policy MSG12: Affordable housing</b>		
DBC (Planning Policy)	<p>Concerns still stand with policy MSG12: Affordable Housing in that it does not set out a percentage requirement for affordable housing and is therefore unclear. Percentage requirements are set out in the emerging Local Plan policy H5: Affordable Housing. Also criteria b sets out that any affordable housing financial contributions will be paid to the local planning authority on the commencement of development. On major development schemes contributions can be paid in phases during construction. It is also stated in this criteria that contributions will be used to deliver affordable homes within the neighbourhood plan area. If there are no suitable sites available in the neighbourhood plan area, the Council may have to look to other parts of the borough to deliver the affordable homes. Criteria b should be reworded to address the issues above.</p>	<p>As percentage requirements are defined within the new local plan, it is not necessary to repeat them within the neighbourhood plan. It is accepted that there may be a need for the policy to be <b>amended</b> to reflect the policy approach within the local plan. However, MSGPC submit that there is a need for the determination of applications to be considered against the needs identified within the MSG HNA.</p>

Consultee	Comment	Middleton St George Parish Council Response
Gladman Developments	<p>The above attempts to support the provision of affordable housing in Middleton St George and states that, “All new residential development that contain ten or more open market residential dwellings or are on sites of 0.5 hectares or more, will be required to contribute to the provision of affordable housing.”</p> <p>Gladman assert that as currently drafted the policy is more restrictive than the emerging Darlington Borough Local Plan which concluded the Regulation 19 consultation in September 2020. Policy H5 of the Darlington Local Plan Regulation 19 version states, “...the provision of affordable housing will be expected in residential development schemes of 10 or more dwellings...”.</p> <p>Gladman recommend that the policies within the MSGNP are sufficiently aligned with the strategic policies of the emerging Local Plan, to avoid risk of the MSGNP failing at examination or ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.</p>	<p>It is accepted that there may be a need for the policy to be <b>amended</b> to reflect the policy approach within the local plan. However, MSGPC submit that there is a need for the determination of applications to be considered against the needs identified within the MSG HNA.</p>
Story Homes	<p>Story Homes wishes to reiterate the concerns raised regarding Policy MSG12 within the Submission version Neighbourhood Plan. This policy does not provide additional guidance or detail which is not sufficiently covered by the emerging Darlington Local Plan. Whilst Story Homes supports the Neighbourhood Plan Groups commitment to ensuring affordable housing is delivered within the settlement, this policy should be supported by clear evidence.</p> <p>Once again, Story Homes supports the ambitions of this policy however would encourage that specific reference is made to emerging Policy H5 – Affordable Housing in the emerging Local Plan. For Middleton St George, the emerging policy requirement</p>	<p>It is accepted that there maybe a need for the policy to be <b>amended</b> to reflect the policy approach within the local plan. However, MSGPC submit that there is a need for the determination of applications to be considered against the needs identified within the MSG HNA.</p>

Consultee	Comment	Middleton St George Parish Council Response
	<p>is set at 20%, which has been carried forward into the Main Modifications consultation and is likely to be adopted as such.</p> <p>It is considered that Policy H5 in the emerging Darlington Local Plan provides a sufficient framework with which the type and amount of affordable housing should be brought forward against. It is unclear if policy MSG12 in the Neighbourhood Plan adds a sufficient amount of detail to be considered effective and non-repetitive.</p> <p>Basic Conditions Test:  Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because:  e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area):  Policy MSG12 does not provide any substantial additional guidance which is not already dealt with through Policy H5 in the emerging Local Plan. The emerging Local Plan policy suggests an affordable housing requirement, which the Neighbourhood Plan does not have regard to.</p> <p>Recommendation:  It is suggested that the Policy MSG12 refer to emerging Local Plan Policy H5 within the policy wording so as to align with the emerging Local Plan. In order to be considered effective and robust, MSG12 should provide clear and evidenced policy as opposed to the vague and nondescript guidance currently put forward. Story Homes welcomes the reference to a viability assessment but suggests that this be investigated further by the Neighbourhood Plan Group in order to fully test the deliverability of said policy.</p>	

Consultee	Comment	Middleton St George Parish Council Response
<b>Policy MSG13: Community services and facilities</b>		
DBC (Planning Policy)	Policy MSG13: Community Facilities and the criteria relating to the potential loss of land or buildings which are in community use appear overly prescriptive when compared against paragraph 93 of the NPPF. The policy also uses the term 'public use' which is unclear with regards to its definition. The term 'community facilities' is used in the NPPF with clear examples given. Amendments are required to the policy to ensure consistency with the NPPF.	Criterion 'c' of paragraph 93 refers to the need to guard against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day to day needs. It is considered that criteria d, e and f of the policy illustrate how valued services and facilities should be protected. The text prior to criteria d-f could be <b>amended</b> as follows: 'Proposals that result in the loss of valued community facilities and services will need to demonstrate that:'
<b>Policy MSG19: Walking and cycling network</b>		
DBC (Planning Policy)	Some changes have been made to policy MSG19: Walking and Cycling Network which reflects advice from the Council's Public Rights of Way Officer during the Pre Submission consultation. It is noted however that the policy title has not been amended to 'Rights of Way' as suggested which is a concern. Further comments have been provided by the Rights of Way Officer below. Public Rights of Way Officer Comments My comments on the Middleton St George Neighbourhood Plan are as follows: 1. Paragraph 2.1 states "The Stockton and Darlington Railway... route is now a public footpath." This statement is false - only part of the S&DR route through Middleton St George is a Public Right of Way, and even then it is a Public Bridleway, not a Public Footpath. 2. Similarly, Paragraph 2.11 states "The plan area has a number of public footpaths, including one which follows the route of the original 1825 railway line" - Again, false. This should read "The	The title of the policy was amended from 'Active Travel' to 'Walking and Cycling Network'. <b>Amend</b> to 'Rights of Way'.  MSGPC understand that the S&DR track bed is a public bridleway west of Sadberge Road, but not to the east, OS mapping illustrates the route to the east as a cycleway. Both sections are part of National Cycle Route 14. In addition, there are a number of public accesses to the S&DR track bed, either purpose-built paved paths, or worn paths across the grass in open space areas. Whatever the formal designation (which DBC would be able to confirm), the

Consultee	Comment	Middleton St George Parish Council Response
	<p>plan area has a number of Public Rights of Way" since some are also Public Bridleways.</p> <p>3. In titling paragraphs 7.4 and 7.5 "Walking and cycling network", any possible use by Horse Riders has been completely disregarded. As advised in the previous consultation by my predecessor Steve Petch, a much more apt title for these paragraphs would simply be "Rights of Way".</p> <p>4. Further, as also mentioned by my predecessor in the previous consultation and disappointingly ignored, the statement in 7.4: "Routes can include established pathways and cycle routes, public rights of way, bridle paths..." confuses the use of the term 'Public Rights of Way' which already includes Bridle Paths (bridleways). In order for this statement to make sense, "public rights of way" should be replaced with "Public Footpaths", and "bridle paths" with "Public Bridleways".</p> <p>5. An additional point raised by my predecessor and left unactioned - What are the 'established pathways' and 'paths of a more informal nature' referred to in Paragraph 7.4? It is not clear what or where these are, and without explanation it is possible to question whether people even have a legal right to use them.</p>	<p>S&amp;DR track bed forms part of the parish wide network of paths for pedestrians and cyclists, comprising not just PROW but also adopted public highways, paths in parks and open spaces, as well as other lanes and tracts of uncertain status which are used by the public without hindrance. DBC recently improved its surface encouraging its use. Horse riding is only permitted on the section that is a public bridleway. MSGPC consider it would be appropriate for the plan to be <b>amended</b> to reflect this.</p> <p><b>Amend</b> section 7.4 as suggested, including deleting reference to established pathways and paths of a more informal nature.</p>
<b>Annex 1: Community actions</b>		
DBC (Planning Policy)	<p>Under Community action 15: Highway safety and traffic management - "ensuring action is taken against the parking of vehicles on double yellow lines and on footpaths." This has nothing to do with footpaths and should instead use the correct terminology of "Roadside Footways".</p> <p>Under Community action 17: Footpaths - "Work with Darlington Borough Council to deliver improvements to footpaths at Sadberge Road and Belle Vue allotments and also the creation of</p>	<p><b>Amend</b> title of CA15 as suggested.</p> <p><b>Amend</b> reference as suggested.</p>

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	<p>a new lit footpath from the entrance to the airport on the A67, parallel to The Whinnies Nature Reserve". This is completely misleading. None of these paths mentioned are Public Footpaths as the term "footpath" suggests. Instead these are permissive accesses, so should be referred to simply as paths, rendering the heading of "Footpaths" false.</p> <p>Under Community action 19: Accessibility enhancements. – “The parish council... will seek to ensure that development provides appropriate footpath and cycle path links from estate roads to the existing footpath and cycleway network”. Creating a footpath is a long legal process, so the correct terminology here would just simply be path, to read “The parish council... will seek to ensure that development provides appropriate path and cycle way links from estate roads to the existing footpath and cycleway network”.</p>	<p><b>Amend</b> as suggested.</p>
Middle Oak Management	<p>Again, the above amendments and adding “Working with Middle Oak Management Lt to identify community wildlife projects” on a community circulated document appeared with no contact from the Parish Council’s Consultant or the Parish Council itself. What the thinking behind this?</p>	<p><b>No change.</b> This is a future action proposed by the parish council to seek to work more closely with Middle Oak Management in the future. It was hoped that this would be considered a positive action.</p>
<b>Policies map</b>		
DBC (Planning Policy)	<p>There appears to be a small discrepancy on policies map 2 where LGS17 Almora Hall field, off Middleton Lane referenced in policy MSG8: Local Green Space, is labelled incorrectly as LGS18 (should be LGS17). LGS17 also appears to be highlighted in the policy. Suggested that this is removed.</p>	<p><b>Amend</b> as suggested.</p>