

# Betley, Balterley and Wrinehill Neighbourhood Development Plan 2021 - 2037

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## **Submission Version**

A Report to Newcastle-under-Lyme Borough Council on the Examination of the Betley, Balterley and Wrinehill Neighbourhood Development Plan

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## Executive Summary

My examination has concluded that the Neighbourhood Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- Concentrating the flood policy into one section of the sustainable development policy and extending its principles to all areas which are subject to flood risk, not just those within the river valleys.
- Removing the stipulation that new housing within the village envelope should be on previously developed land.
- Restricting the scope to use local occupancy criteria to rural exception sites.
- Restricting the plot density requirements upon redevelopment of sites to only those within the Green Belt but to allow development inside the Betley Village envelope so long as the development effectively integrates with the surrounding area.
- Removing from the policy the need to submit a landscape and visual impact assessment.

The referendum area does not need to be extended beyond the Plan area.

## Introduction

1. Neighbourhood planning is a process introduced by the Localism Act 2011 that allows local communities to create the policies that will shape the places where they live and work. A neighbourhood plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies that will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 adopted in October 2009 and the saved policies of the Newcastle-under-Lyme Local Plan, which was adopted in 2003. Decision makers are required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been undertaken under the supervision of Betley, Balterley and Wrinehill Parish Council. A Neighbourhood Plan Steering Group was appointed to undertake the Plan's preparations which reported to the Parish Council and was made up of parish councillors and local residents.
3. This report is the outcome of my examination of the Submission Version of the Betley, Balterley and Wrinehill Neighbourhood Plan. My report will make recommendations, based on my findings, on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by Newcastle-under-Lyme Borough Council.

## The Examiner's Role

4. I was appointed by Newcastle-under-Lyme Borough Council in May 2021, with the agreement of Betley, Balterley and Wrinehill Parish Council to conduct this examination.
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 43 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of my neighbourhood planning consultancy, John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of Newcastle-under-Lyme Borough Council and Betley, Balterley and Wrinehill Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

6. Under the terms of the neighbourhood planning legislation, I am required to make one of three possible recommendations:
  - That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
  - That the Plan should proceed to referendum, if modified.
  - That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements
7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Betley, Balterley and Wrinehill Neighbourhood Plan area.
8. In examining the Plan, the Independent Examiner is expected to address the following questions
  - Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
  - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
  - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and been developed and submitted by a qualifying body?
9. I am able to confirm that, if amended in line with my modifications, the Plan does only relate to the development and use of land, covering the area designated by Newcastle-under-Lyme Borough Council, for the Betley, Balterley and Wrinehill Neighbourhood Plan, on 30<sup>th</sup> August 2016.
10. I can also confirm that it does specify the period over which the Plan has effect, namely the period from 2021 up to 2037.
11. I can confirm that the Plan does not contain policies dealing with any “excluded development”.
12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
13. I am satisfied that Betley, Balterley and Wrinehill Parish Council as a parish council can act as a qualifying body under the terms of the legislation.

## **The Examination Process**

14. The presumption is that the Neighbourhood Plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put forward a case.

15. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.
16. I am satisfied that I can properly examine the Plan without the need for a hearing.
17. I carried out an unaccompanied visit to Betley, Balterley and Wrinehill during the last week of June 2021. I spent the morning driving around the parish and I spent time in each of the three settlements. I was able to get a sense of how the village envelope marks the interface between Betley and the surrounding countryside. I was able to appreciate the local vernacular and the parish's numerous historic buildings, both designated and non-designated heritage assets and the conservation area in Betley. I visited each of the community and recreation / open spaces referred to in the plan and outside of the settlements, I was able to gain an appreciation of the landscape characteristics of the parish.
18. Following my site visit, I prepared a document seeking clarification on a number of matters, which I sent to both the Parish Council and Newcastle-under-Lyme Borough Council, entitled Initial Comments of the Independent Examiner, dated 29<sup>th</sup> June 2021. I received the response from Newcastle-under-Lyme Borough Council on 13<sup>th</sup> July 2021 and from the Parish Council on 14<sup>th</sup> July 2021.
19. Along with its responses to my Initial Comments document the Parish Council asked me to consider an addendum to the neighbourhood plan which was intended to be an Advisory Supplementary Planning Guidance. As I explained to the Borough Council when I was asked about the possibility of including it within my examination, I am required by the legislation to examine the plan, *as submitted*. It would appear that this recently produced document had not been the subject of any public consultation either at Regulation 14 or Regulation 16 stage. I am therefore unable to consider it as part of my examination.
20. If the neighbourhood plan is made, in due course, it is possible for material modifications to the plan to be dealt with without the need for further referendum and the PPG advice quotes as an example the addition of a design code that builds upon an existing design policy.
21. On 26<sup>th</sup> July 2021, I issued a further document entitled Further Comments of the Independent Examiner seeking views on the implications of the changes to the National Planning Policy Framework. I was sent 3 responses on 9<sup>th</sup> August 2021.
22. All these documents have been placed on the respective websites.

## **The Consultation Process**

23. The launch of the neighbourhood plan process was announced in an article published in the parish magazine seeking recruits to help with the plan making.
24. At the start of the process, the Steering Group produced a Community Engagement Strategy and regular updates on the progress on the plan were given through the parish magazine and a neighbourhood plan website was launched.

25. On 12<sup>th</sup> July 2016, a letter was sent to every household in the parish and a series of roadshows took place between July and September 2016, including the Steering Group's attendance at the Betley Show.
26. A residents' questionnaire was distributed in March 2017 which received 311 replies, a 54% response rate.
27. There was a separate consultation with local businesses and organisations which continued from November 2017 through to 2019, and this produced responses from 18 locally based businesses and 14 local organisations.
28. A first draft of the plan was published on 23<sup>rd</sup> August 2019 and this included two open events held at The Reading Room and the Village Hall. This generated 39 responses including from the Newcastle- under- Lyme Planning Department and it is clear that there have been ongoing communications between the Parish Council and the Borough Council throughout the neighbourhood planning process.
29. All this activity culminated with the preparation of the Pre-Submission version of the Neighbourhood Plan which was the subject of a seven - week consultation, known as the Regulation 14 consultation, which ran from 8<sup>th</sup> October to 27<sup>th</sup> November 2020. Despite this consultation taking place in the midst of the Covid-19 pandemic, the Steering Group found ways of allowing the public to comment on this version of the plan. The responses to the Regulation 14 consultation are fully set out in Appendix 6 of the Consultation Statement which also sets out how the Steering Group responded to the comments made.
30. I am satisfied that the Parish Council has actively sought the views of local residents and other stakeholders and their input has helped shape the Plan.

### **Regulation 16 Consultation**

31. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a six-week period, between 19<sup>th</sup> April 2021 and 31<sup>st</sup> May 2021. This consultation was organised by Newcastle-under-Lyme Borough Council, prior to the Plan being passed to me for its examination. That stage is known as the Regulation 16 Consultation.
32. In total, 8 responses were received, including National Grid, Newcastle-under-Lyme Borough Council, Natural England, United Utilities, The Coal Authority and three local residents.
33. I have carefully read all the correspondence and I will refer to the representations where relevant to my considerations and conclusions in respect of specific policies or the Plan as a whole.

### **The Basic Conditions**

34. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of "soundness". The Neighbourhood Plan is tested against what are known as the Basic Conditions as set down in legislation. It will be against these criteria that my examination must focus.

35. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -

- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State? For the sake of clarity, this examination will look at how the plan has regard to the most up to date version of the NPPF, published on 20<sup>th</sup> July 2021 and the paragraph numbers of that version will be quoted throughout this report.
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
- Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?

### **Compliance with the Development Plan**

36. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the adopted Development Plan, which in this case are the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026, adopted in October 2009 and the saved policies of the Newcastle-under-Lyme Local Plan adopted in 2003. It also includes the Minerals Local Plan for Staffordshire and the Staffordshire and Stoke-on-Trent Waste Local Plan, but the latter two documents are not relevant to the plan as they cover matters which the legislation designates as “excluded development”. Much of the neighbourhood plan area lies within the Green Belt.

37. The plan area falls within the area which is covered in the Joint Core Spatial Strategy by the Rural Area Spatial Policy. None of the settlements in the plan area are identified in that policy as being a key rural service centre. The key policy for this area is Policy ASP6 which encourages the diversification of the rural economy and the reuse, conversion and replacement of existing buildings in sustainable locations. High expectations regarding design quality are set out in Policy CSP1 and the protection of the historic environment is given by Policy CSP2. Affordable housing is addressed by Policy CSP6 and that allows the release of rural exception sites on land immediately adjoining a village, so long as the scale that development should not exceed the identified level of local need.

38. Of the saved policies in the Newcastle- Under-Lyme Local Plan, Policy S3 deals with development in the Green Belt. Policy H1 permits developments within “village envelopes”. Policy H7 provides for the protection of areas of special character which includes an area to the north of Betley, which is characterised by



large houses and extensive plots and the policy presumes against the subdivision of these plots and the loss of visually significant trees in that area.

39. The Borough Council in January 2021 made a decision to no longer pursue the preparation of a joint Local Plan with the City of Stoke on Trent and it decided to prepare its own local plan. Work on that plan is in its earliest stages and is not relevant to the issue of general conformity with the strategic policies in the development plan.
40. My overall conclusion is that the Neighbourhood Plan is in general conformity with these strategic policies in the Newcastle-under-Lyme Borough Council Local Plan 2011 and the Joint Core Spatial Strategy.

### **Compliance with European and Human Rights Legislation**

41. Newcastle-under-Lyme Borough Council issued a Screening Opinion, in a report dated March 2021, which concluded that a full strategic environmental assessment, as required by EU Directive 2001/42/EC, which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would not be required.
42. The District Council, as competent authority, also issued a screening opinion, under the Conservation of Habitat and Species Regulations 2017. This concluded that a full Habitat Assessment would not be required on the basis that the plan would not have a significant impact upon European protected sites, of which there were two within the plan area – Betley Mere and Black Firs and Cranberry Bog which are both RAMSAR sites and the nearby Oakhanger Moss RAMSAR site, Wybunbury Moss which is another RAMSAR site and part of West Midlands SAC and Bagmere which is similarly a RAMSAR site
43. I am satisfied that the basic conditions regarding compliance with European legislation, including the more recent basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the Plan has no conflict with the Human Rights Act.

### **The Neighbourhood Plan: An Overview**

44. This is a focused and locally distinctive neighbourhood plan which covers the three settlements within the parish and its surrounding countryside, with just ten policies. The plan seeks to address the particular issues that the community has raised during its preparation. One of the key attributes of the neighbourhood plan system is that the plan’s policies only need to deal with the topics which are of importance to local residents. It is clear that the plan has evolved having taken on board comments made during the various consultation phases of the plan’s preparation.
45. I have had to propose some changes to the policies, a small number of which may disappoint the Parish Council. The plan, in particular cannot restrict the occupation, of what would be otherwise acceptable new development,

particularly in the settlement of Betley which has a village settlement boundary, to those with a local connection. A neighbourhood plan cannot override the allocation policies of the Housing Authority when it comes to the allocation of affordable housing within the parish, especially where it takes place inside the settlement boundary. For the same reason, the plan cannot prescribe who can purchase and occupy new market housing in the plan area. The only avenue to achieve the development with a local connection policy, would be through the development of a rural exception site on the edge of a settlement. I am aware that the Parish Council knows that is a possible route going forward.

46. Generally, the policies have been well drafted and in fact, a number have emerged from the examination unmodified. No policies have had to be deleted in their entirety, which is unusual. It is clear that the Parish Council in preparing the plan has been conscious of the basic condition of having regard to Secretary of State policy and advice.
47. I am also satisfied that the plan will meet the basic condition of delivering sustainable development. The plan does not have to allocate land for new housing but its policies will direct residential development to the parish's main settlement with a settlement boundary. The plan sets high aspirations when it comes to the design and resource efficiency of new buildings. It seeks to direct development away from areas liable to flood and also to protect the natural environment and biodiversity assets of the parish. The policies protect the historical assets in the parish along with its valued community facilities and open/recreation spaces. The plan safeguards the intrinsic beauty of the Staffordshire countryside, which is also protected by its Green Belt designation, but it does allow economic diversification through, for example, the reuse of existing buildings in the countryside.
48. My recommendations have concentrated particularly on the wording of the actual policies against which planning applications will be considered. It is beyond my remit as examiner, to comprehensively recommend all editorial changes to the supporting text. Such changes are likely as a result of my recommendations, in order that the Plan will still read as a coherent planning document. It will also be an opportunity to update the text to reflect textual and paragraph references say to the NPPF to the most recent versions
49. Following the publication of this report, I would urge the Parish Council and Newcastle-under-Lyme's planners to work closely together to incorporate the appropriate changes which will ensure that the text and policies of the Referendum Version of the neighbourhood plan accord with my recommended modifications. There may also need to be editorial matters to resolve such as policy numbering, as a consequence of my recommended changes.

## The Neighbourhood Development Plan Policies

### Policy BBW1: Promoting Sustainable Development

50. There are four strands to this policy. Three of the four parts of the policy each include reference to reducing flood risk. All planning applications need to be assessed against all relevant aspects of policy and it could reduce the focus and usability of the policy, if the flood implications need to be considered against different aspects and it would be, in my view, clearer to applicants and decision makers, if the plan's requirements in terms of flooding are covered by the section dealing with "Reducing Flood Risk". I will recommend that the reference to flood risk be removed from the built environment and natural environment parts of the policy.
51. Part 1A of the Built Environment refers to national technical standards. I am not aware of any such national technical standards relating to flooding beyond the advice set out in the NPPF and the Planning Practice Guidance. There is the DEFRA Non- Statutory Technical Standards for Sustainable Drainage Systems. But I am not sure that is being referred to. In view of the absence of the specifics, I will be recommending the reference to these national standards be removed as a decision maker would not know where to reference what is being quoted as "national technical standards".
52. In terms of requirement 1C, the policy relates equally to designated heritage assets such as listed buildings and non-designated assets. I believe that the test should more appropriately refer to the particular significance of the heritage assets, which in cases affecting non-designated assets the decision maker is required to weigh the scale of any harm or loss with the significance of the asset (paragraph 203 of the NPPF). That will then bring it into closer alignment with the approach set out in the Framework.
53. For the previously referred to reasons, I will similarly recommend removing the flood risk from the natural environment section of the policy.
54. The recent changes to the NPPF have stressed the need to reduce flood risk from all sources of flooding and I consider that the remit of the policy should extend beyond just river corridors, to all areas known to be at risk from flooding. I will recommend another change to reflect the new aspiration towards "beautiful buildings and places."
55. In terms of the effect of development on water courses which have been not identified in the Environment Agency flood maps, I consider that any further work required by the applicant by way of modelling should be proportionate to the scale of the development
56. I also consider that the requirements set out in 1D should only be applied where it is appropriate to do so. For example, there will be some locations or types of development where it would not be suitable to be allocating flood storage areas.

#### *Recommendations*

***At the end of the first paragraph insert "and to provide beautiful buildings and places"***

***In 1A delete all the text after “resource efficiency”***

***In 1C before “historic buildings” insert “the significance of”***

***In 2B omit “flood risk”***

***In 4 after “flood risk” insert “to all areas known to be at risk from flooding” and after “should” add “where appropriate and relevant to the development”***

***In 4A replace the third sentence with “any development which could impact on any watercourse which does not have any flood extents associated with it, will be required to demonstrate through proportionate evidence or modelling that it will be safe and not increase flood risk”***

### **Policy BBW2: New Housing in Betley Village Envelope**

57. A planning application will be required to consider all relevant policies, not just those in the neighbourhood plan, but also the policies contained in the local plan(s). To highlight specifically Policy BBW4 and Policy BBW5 could imply that compliance with other policies of the development plan is not as important. I will be referring to other “development plan policy” in my recommendation.

58. I am not aware of any policy which indicates the development within the village envelope is only acceptable if it is located on previously developed land. That requirement would conflict with the first sentence of the policy which states new housing development will be supported within the village envelope and is also enshrined within Policy H1 of the Newcastle-under-Lyme Local Plan 2011. I will be recommending that this element be clarified by relocating it to the first paragraph and stating that such developments will be encouraged.

### ***Recommendations***

***In the first paragraph, after “Village Envelope” insert “, especially if located on a previously developed site” and replace all text after “satisfy all” with “relevant development plan policies”***

***Delete 1. in the second paragraph***

### **Policy BBW3: Housing Mix**

59. The first part of the policy identifies that there is the need for more small housing to be built within the parish as part of a suitable mix. I considered the plan and its evidence base has justified that as appropriate. National guidance is that neighbourhood plans should identify what types of housing an area needs to be making provision for. This part of the policy expects applicants to provide the type of housing that there is a particular need for in the parish. The Parish Council has confirmed in its response to my Initial Comments document that it is intended to apply to market housing and it is suggested that the title and the text should make that explicit. I agree that would be helpful but the policy cannot restrict the occupation of new housing to local people only.

60. The policy then goes further to express support for schemes which are intended to specifically cater for local people already living in the parish, for young people or only people wishing to downsize. The Parish Council has again clarified that this part of the policy relates to affordable housing and was added after the

Regulation 14 consultation, which could include rural exception sites as well as sites within the village envelope.

61. Where development would take place in locations where housing would ordinarily not be countenanced e.g. outside the village envelope but where it is specifically designed in consultation with the Parish Council to provide for identified local needs housing, then the local connection policy can be justified. However, where affordable housing is taking place inside the settlement then the question of who occupies that affordable housing is not necessarily a planning consideration. The criteria for the allocation of such properties are a matter that falls within the jurisdiction of the Housing Authority, through its Allocation Policy rather than the Local Planning Authority, although such policies will have a local connection criterion included as well as housing need. That could be explained in the supporting text.

### ***Recommendations***

***At the start of the second paragraph, insert “Market housing”***

***At the start of the third paragraph, after “new housing” insert “on rural exception sites aimed” and at the end of that sentence change “Neighbourhood” to “Development”***

### **Policy BBW4: Detailed Design in the Parish**

62. The particularly contentious part of the policy relates to the section on plot density. The Parish Council specifically wishes to see development on brownfield sites, reflecting the previous volume and density of development as currently sits on site, but the second part of the policy does not allow an applicant the opportunity to depart from that approach.
63. I believe the policy needs to differentiate between land within the Green Belt where the approach being taken aligns with the Secretary of State’s policy, as set out in paragraph 149g) of the NPPF. However, within the village boundary, taking the same approach as in the Green Belt area could mean that the policy runs counter to the aspirations of the Secretary of State as set out in Chapter 11 – Making Effective Use of Land in the Framework, which seeks to promote the effective use of land to meet needs for housing and other uses. In a circumstance where an existing development, for example underutilises a site, following this policy could help perpetuate that inefficient use of land. The Secretary of State’s advice does however, in paragraph 124, allow decision makers to take into account “the desirability of maintaining an area’s prevailing character and setting.” I understand that two developments which have raised the profile of this plot density issue locally, are sites which fall within the Green Belt.
64. My conclusions on this matter are that the policy approach set out in 4A is appropriate in the Green Belt where the onus should be for the replacement development to have no greater impact on the openness of the site than the existing buildings. However, within the Betley Village Settlement following the approach set out in 4B, will allow sites to be developed in a way that makes efficient and effective use of the land, yet still having regard to “the effective integration with the surrounding built form, village scape and landscape”.

### ***Recommendations***

***In 4A after “previously developed sites’ insert “within the Green Belt” and add at the end “so as not to have a greater impact on its openness”***

***Replace 4B with “Within Betley Village Envelope, proposals will need to demonstrate how the development will effectively integrate into the surrounding built form, village scape and landscape”***

### **Policy BB5: Conserving and Enhancing the Conservation Area**

65. I have no comments to make on this policy.

### **Policy BBW6: Recognising the Intrinsic Character of the Countryside and Protecting and Enhancing Valued Landscapes**

66. I have no concerns regarding the thrust of the policy which is locally distinctive and reflects the specific requirements for development in the parish.

67. A neighbourhood plan policy cannot, however, dictate what documents need to be submitted with a planning application. Under the terms of the Town and Country Planning (Development Management Procedures) Order 2015 that is the role of the local validation requirements, which are published by the Borough Council and covering the whole district. The Newcastle-under-Lyme local List already requires that major developments in rural areas should be accompanied by a landscape/visual impact assessment. I would recommend that this paragraph of the policy be deleted.

### ***Recommendation***

***Delete the paragraph headed “Landscape and visual impact assessment”***

### **Policy BBW7: Supporting Conversion of Existing Buildings for Small-Scale Business Development (Class E)**

68. I have no comments to make which means the policy meets basic conditions.

### **Policy BBW8: Supporting Homeworking**

69. The policy refers to internal space standards but does not expand on what internal space standards it is referring to. The previously mentioned National Described Space Standards, as published in March 2015, can be triggered if there is a local plan policy supporting their use, which I do not believe is the case within Newcastle under Lyme Borough. There are no current provisions for home office space within the national space standards and I propose to delete that as a consideration under this policy. Also, as the plan text acknowledges, not all development allowing for, or supporting homeworking requires planning permission. I will caveat the policy to the effect that it only applies where planning permission is required.

### ***Recommendation***

***At the start of the policy insert “Where planning permission is required” and omit “internal space standards”***



### **Policy BBW9: Community Facilities**

70. I have no issues with the community facilities that have been identified, nor the policy.

### **Policy BBW10: Recreation and Open Space Facilities**

71. I have no comments to make on this policy which meets basic conditions.

### **The Referendum Area**

72. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Betley, Balterley and Wrinehill Neighbourhood Development Plan as designated by Newcastle-under-Lyme Borough Council on 30<sup>th</sup> August 2016 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

### **Summary**

73. I congratulate Betley, Balterley and Wrinehill Parish Council on reaching this important stage in the preparation of the neighbourhood plan. I appreciate that a lot of hard work has gone into its production and the Parish Council can be proud of the final document.

74. The plan has focussed on just the matters that are of importance to the local community. I consider that the policies will be a sound basis for considering planning applications in the parish into the next decade or so. It will of course be necessary to keep the plan under review to have regard to changes in the strategic planning context of the district.

75. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

76. I am therefore delighted to recommend to Newcastle-under-Lyme Borough Council that the Betley, Balterley and Wrinehill Neighbourhood Development Plan, as modified by my recommendations, should proceed, in due course, to referendum.

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6<sup>th</sup> September 2021