

Saham Toney Neighbourhood Plan
Factcheck Comments on Examiners Report

We welcome this very clear and well justified report on this Examination. The main issue is with its presentation, in terms of the formatting and punctuation, where we have tried to identify all the issues, but there may be more, so it would benefit from a further proofing. Also a few clearer recommendations would assist the amending of the Neighbourhood Plan.

Key National Planning Policy Framework – NPPF / Local Plan – LP / Neighbourhood Plan – The Plan

Page and Policy/ Paragraph No	Comment	Suggested Amendments
Whole Plan - Formatting	Although most of the Report does have the text justified on the right-hand side, as requested, this still needs to apply to para's 1 - 48 plan (pages 3-13).	As requested.
	The formatting around the headings and sections is inconsistent in terms of the number of line spaces them and a standard format would present better.	Check throughout report e.g page 8,10, 37, 38, 39, 43, 45, 51, 52 & 53.
	The spacing after the para number is not consistent and a standard format would present better.	Amend so there is only one space, rather than two, in the following para No's: e.g. 20, 55, 65, 84, 87, 93, 94, 96, 105, 130 & 147.
	There are a number of full stops missing from the end of sentences in the text as well as policy recommendations (see specific examples). Also commas have either been mistakenly included or excluded, which is being picked up by the auto check and needs to be reviewed.	Missing full stops e.g. In text - p6, para 6 (last bullet point) and 9; p37, para 143, 3 rd sentence; In 'Recommendations' - p26, para 98, p29, para 110, at end of new text in T2D.6.
Whole Plan - Referencing	Where refence has been made to LP policy, they have been incorrectly presented as there should be a space between the letters and numbers, and some have a letter instead of a number e.g. 'O' rather than '0'.	e.g. 'GEN03' should be presented as 'GEN 03' in para 36. Also HOU01 (para 37), GEN05 ((para 99). HOU04 (para 37, 42, 58 & 87), and also presented as HOU4 (p3, 4 th bullet point, para 60, 61 & 103 x2), HOU6 (also missing 0) & HOU07 (para 38), ENV01 (para 39), ENV02 (para 39 & 168) and also presented as ENVO2 (para 168), ENVO3 (para 39), ENV04-05 (para 40 & also 163 for the

		latter), ENV09 (p4, last bullet point, 41, 178 & also presented as ENVO9 (para 189) etc.
Whole Plan - Referencing	Where refence has been made to NP policy in the main body of the report, they tend to have been incorrectly presented as full stops have been added between the letters when they are not required or are missing completely.	e.g. remove 1 st full stop and extra space in para 89 - T.1.9 should be presented as T1.9. In para 98, the 1 st full stop - P.2A.1 as P2A.1, as well as for Maps 2.F.1. & 2.F.9 (para 119). In para 101 Recommendations, remove the extra space in 2.B.8” and in para 110, STNP.16. Remove 1 st two full stops in para 132 - P.2.H.2. should be P2H.2. Also the same for P.2.O.2. (para 145), P.7.A.2 (para 164), P.7.E.2. (para 172) and P.7.F.3 (para 176). Add missing full stop before the last number: P2E2 & P2E3 (para 112), T2L8 (para 141)
p1	N.B. The date needs to be added to the Final version.	
p2	N.B There is reference to the front page (Submission version) in the Contents page. It is not clear why this is here as it is not something that would be referred to.	
p3	4th bullet point – ‘HOU4’ has been incorrectly presented – there is a space and number missing. 10 th bullet point - The coma is in the wrong place as there is an extra space after the word ‘obligation’.	e.g. HOU 04 Replace with; “... <i>planning obligation</i> , the public access...”.
p6, para 8	A colon is missing from the end of the sentence.	
	A full stop is missing from the end of the sentence.	
p6, para 10	‘2014’ at the end of the sentence needs to be removed.	As advised.
p7, para 15	4 th sentence - there is an extra space between the words which needs to be deleted.	Remove extra space: “... <i>Examiner to be able to ask for a public hearing...</i> ”.
p9, para 24	The date for the start of the 1 st Reg.14 consultation is incorrect.	Replace ‘22 nd ’ with ‘12 th ’.
p10, para 30	1 st sentence - The first date is incorrect - see Breckland Council Neighbourhood Plan website: https://www.breckland.gov.uk/article/15799/Saham-Toney-Neighbourhood-Plan-Reg-16 Last sentence - it may be useful to include ‘Submission’ in this description ‘Regulation 14 Pre-Submission’, is referred to in this report (para 24).	Amend to ‘29 th ’. “That stage is known as the Submission Regulation 16 Consultation ”.

p11, para 35	This date is incorrect and needs amending.	Replace '20 th ' with '28 th '.
p12, para 43	1 st sentence - The reference to a 'screening report' is not accurate as this was a 'draft' report, issued only for the statutory consultation. This version was always subject to change as part of the consultation process. (and the final decision was not made until xx/xx/xx – the date of the email/or a report Also this version does not have the same status as the version referred to in the 2 nd sentence, which was a final version.	The version of the 'Screening Report' being referred to needs to be accurately referred to e.g. 'a draft screening report'.
	N.B. 3 rd sentence - the decision made on the final 'screening report' was solely due to the statutory consultees view due to their professional expertise.	
p12, para 44	1 st sentence - there is an extra space between the words which needs to be deleted.	Remove extra space: "...was followed by an SEA Scoping...".
p15, para 53	1 st sentence – this is not very clear and needs either one of two words deleting or adding 'or' between them.	"Together they produce account for..." "Together they account for..." "Together they produce or account for..."
p16, para 60	1 st sentence - The paragraph reference is incorrect.	'T2.8.4' should read ' T2A.4 '.
p17, para 61	N.B. With regards to additional housing, there is no reference to detailed Government policy that aims to deliver additional housing e.g. to build 300,000 new homes every year.	
p18, para 65	2 nd sentence - there is an extra space between the words 'facilities' and 'as' which needs deleting.	Remove the extra space: "...from walking to facilities as a basis ...".
p18, para 66	2 nd sentence - The grammar needs amending and there are extra spaces between the words 'out' and 'that' which needs deleting.	"it's" needs to be replaced with "its". Remove the extra space e.g. "... pointing out that a lot of the policies ...".
p20, para 76	2 nd sentence - there is an extra space between the words which needs to be deleted.	Remove the extra space: "...particularly start-up facilities and micro businesses ...".
p21, para 80	This paragraph needs re-aligning with the other paragraphs in the rest of the report.	
p21, para 82	1 st sentence - there is an extra space between the words 'policy' and 'then' which need deleting.	Remove the extra space: "The policy then goes on to require ...".
p22, para 82	2 nd sentence - This sentence is not very clear; either a word/s and a comma need to be added or some text deleted.	Either "... recognises that infrastructure to be xxx , has to be in place..." or "... recognises that infrastructure to be has to be in place...".
p22, para 83	4 th sentence - there is an extra space between the words 'policy' and 'is' that needs deleting.	Remove the extra space: "...such a policy is based on evidence...".

p22, para 84	There is a colon is missing at the end of the sentence.	Add colon: "...in that they must be: ...".
p22, para 85	2 nd line - There is a return added in the end of the line, after the word "covering", which is not needed.	Delete the return.
p22, para 86	2 nd sentence - there are extra spaces between the words, either side of 'some' that needs deleting.	Remove the extra spaces: "I did hear some evidence of ...".
p23, para 86	2 nd sentence - in a couple of areas, there are extra spaces between a number of words which needs deleting.	Remove the extra spaces: "...local commissioning group, that they have...". Also "...education authority during the hearing, was that the village school had a capacity for 105 pupils ...".
	Also this sentence is rather wordy, it would read better if this was split into two sentences, after the word "area".	"...the wider area. and indeed, whilst...".
p24, para 91	In P1.4 delete "the timing" - this recommendation produces unclear policy and a further word needs deleting.	In P1.4 delete "the timing off"
p26, para 98 Recommendations	In P.2A.1 "delete the remainder of the policy after ": allocation of sites" and insert ", shown on Policy Map 2A and set out in Policies 2H to 2P" - is there a need to add a coma as one is already there? Also the full stop is missing at the end of the policy. Does "Delete the last sentence of the second paragraph of paragraph T2A.1" refer to the sentence starting with "To be consistent with..."? If so, a reference to the start of the relevant sentence would make this much clearer. Re T2A.4, does "; and" at the end of subsection a). need to be deleted?	"...after ": allocation of sites," and insert "; shown on Policy Map 2A and set out in Policies 2H to 2P." Delete the last sentence of the second paragraph of paragraph T2A.1 starting with "To be consistent with..." Add "In paragraph T2A.4 delete "and" at the end of a), b) and c).
p26, para 99	There are extra spaces between words 'in' and 'Policy' & 'it' and 'qualifies', that need deleting.	Remove the extra spaces: "set out in Policy ..." & "...that it qualifies...".
p27, para 101 Recommendations	In P2B.1, the full stop is missing from the end of the new policy. In T2 B.8, the NP Policy reference has an extra space in it.	"...character area as set out in Policy 7A." Remove the extra space: "T2 B.8".
p27, para 104 Recommendations	Is the reference to "Delete T2C.6 and T2C.7" required, as it is already covered within "Delete paragraphs T2C.2 through to T2C.7"?	Delete (duplication reference to) "Delete T2C.6 and T2C.7"
p28, para 108	Would it be clearer, for the general public, to clarify why this has occurred e.g. as a result of a monitoring exercise, as only planners are more likely to understand this?	"The housing completion situation changing, as a result of monitoring , has meant that the number of units...".
p29, para 110 Recommendations	In P2D.1, the full stop has been deleted under this recommendation and needs to be kept.	"In P2D.1 delete the remainder of the first sentence after "applied" except the full stop ".

	Re T2D.6, the full stop is missing at the end of the new text and at the end of this recommendation 'policy' should be replaced with 'text' as it is for the latter. Also does it refer to the sentence starting with "Allocated sites STNP4, 7 and 16 ...". If so, a reference to this would make it much clearer.	"... the neighbourhood planning process." "...and delete the last two sentences of the policy this text , starting with "Allocated sites STNP4, 7 and 16 ...".
p30, para 112 & 116 Recommendations	Mention is made to the housing needs assessment, that "does not need to be repeated in paragraphs P2E2 and P2E3". Therefore, it is not clear why there is no mention to deleting this in the Recommendations?	Either delete reference to this or add their deletion to the recommendations e.g. Remove reference to the "*", making reference to the footnote for the Saham Toney Housing Needs Assessment.
p30, para 116 Recommendations	P2E.1 - it would be clearer if "delete the text after "housing need" and insert "as set out in the Saham Toney Housing Needs Assessment 3rd Edition, April 2020 or any subsequent update to it", also made it clear that it was being taken from the end of the policy, or there was a reference to deleting this footnote policy as without this it will duplication of the policy. The recommendation regarding P2E.4 a) "after "designed for the" insert "to be suitable for occupation by" results in unclear text and it would be better to also delete the words 'for the'. Re T2E.7, it would be useful to clarify that this should be before the colon.	In P2E.1 delete the text after "housing need" and insert (or move) "as set out in the Saham Toney Housing Needs Assessment 3rd Edition, April 2020 or any subsequent update to it" from the footnote policy. " or Also add "Delete "As set out in the Saham Toney Housing Needs Assessment, 3rd Edition, April 2020, or any subsequent update to it". a) Housing specifically designed for the to be suitable for occupation by older adults, suitable for independent living, in accordance with Lifetime Home Standards; In T2E.7, at the end of the first sentence, before the colon , insert "the preferences of those on the Housing Register"
p32, para 121 Recommendations	"Replace P2F.2 with "A proportionate..." - the full stop is missing from the end of the recommendation. P2f.7 should be a capital rather than lower case letter. Add the text in T2H.17 to the supporting text - Is this the correct reference as this is already in the text in another section on page 75 or if does need to be moved to the text in this section, it does not say <u>where</u> it should be moved to.	...necessary mitigation measures." P2f.7 should read P2 F .7 Clarify what is actually required e.g. "Add the text in from T2H.17 (???) to the supporting text at the start/end of para??? ...".
p32, para 122 Recommendation	"In P2G.3 after "landscape sensitivity" insert "See Table 7A1.1 and Policy Map 7A.3 ..." - 'See' needs either to be a lower-case letter and have a comma at the	"...insert " S ee Table 7A1.1 and Policy Map 7A.3, ... " or

	end of the new policy, or be added in brackets, as it is being added to a middle of a sentence. Also “. is missing from the end of the text.	“...insert “(See Table 7A1.1 and Policy Map 7A.3)” ...”. “...7A1.1 and Policy Map 7A.3”.
p34, para 132 Recommendations	“Also Replace “up to “with “approximately” - there is a capital letter, rather than lower case one, within the sentence and an extra space before ‘with’. Amend the site boundary on Policy Map 2H as shown in paragraph 125 - this is as clear as it could be, so by adding the word ‘above’ to the end of this recommendation it clarifies that this is referring to this report rather than the NP. In e) delete the final sentence - this would leave the bullet point with a full stop rather than semi colon, so needs further clarification.	Replace with “Also Rreplace “up to” with “approximately”. “Amend the site boundary on Policy Map 2H as shown in paragraph 125 above ”. In e) delete the full stop and final sentence.
p35, para 136 Recommendations	In P2I.1, replace “ predominantly brownfield land” with “land predominantly occupied by agricultural buildings” as ‘predominantly’ does not appear in the submitted Reg.16 version of the policy it needs deleting. Replace “up to “with “approximately” - remove the extra space after ‘with’ and add one before “approximately”.	“ predominantly brownfield land”. “Replace “up to” with “approximately”.
p36-38, para 139-145 Recommendations	J-O - no issues	
p38, para 145 Recommendations	Delete T2).1 - there is a ‘)’ rather than ‘O’ in the policy reference.	“Delete T2)O.1
p39, para 147 Recommendations	P2P.1 c) - To be consistent with the rest of the policy, a semi colon needs to be added at the end of the sentence.	“...of the development;”
p40, para 152 Recommendations	In P3A.7 b) - To be consistent with the rest of the policy, the recommendation needs to start with a capital letter and the ‘Be’, at the start of the original text, amended to lower casing.	Replace with; “... A are encouraged to B be in accordance... ”.
	The ‘and’ at the end of g) is still required, as it is the last but one criterion and this should be made clear.	Replace with “...In P3A.10, delete d) and g), except the last ‘and’. ”.
p41, para 154 Recommendations	There is an extra space after the word ‘by’ that needs deleting.	Remove extra space “...development proposals shall” by “and should”
p41, para 155	N.B. It is noted there is no reason given in the statement “I have no comments to make on this policy”, where one is given in para’s 157, 160, & 167.	
p41, para 156 Recommendation	To be consistent with the other recommendations, make it clear where to add the new policy.	“In P3D.1 add an additional principle at the end of the bullet points “I) All new dwellings...”

p42, para 158	2 nd sentence - The coma is in the wrong place, as there is an extra space after the word ' <i>mentioned</i> ' and none before ' <i>under</i> '.	Move the comma: "...mentioned, under...".
p42, para 159 Recommendations	In T3F.3 replace " <i>Policies 8 A to 8H</i> " by " <i>Policy 8A</i> " - it would be clearer if reference was made to this being in criteria a).	"...In T3F.3 a) replace...".
p43, para 164	1 st sentence - there is are extra full stops in the NP policy reference and an extra space between ' <i>P.7.A.2</i> ' and ' <i>reference</i> ', that needs deleting.	"...criteria set in P.7.A.2, reference to...".
p44, para 166 Recommendations	3 rd sentence - This is not very clear, and it seems that words need to be replaced. 4 th sentence " <i>However, this is not a development plan policy, I do not need to make recommendations to delete them</i> " - This is not at all clear; if this text is not supporting or justifying 'development plan policy' why is it needed and therefore not deleted? Further clarification on this point is needed.	Replace with: " <i>I would point out the that a number the-of supporting text criteria...</i> "
p45, para 171	The Local Plan Policy numbers have been incorrectly presented (missing spacing), as addressed above. Also this recommendation needs a comma at the end and the capital 'D' in ' <i>development</i> ' to be replaced by a lowercase 'd'.	Replace with; "...P7D.1 As well as complying with the requirements of Policy ENV 02 and Policy ENV 03, Ddevelopment proposals... ".
p47, para 181	2 nd sentence - there is an extra space between ' <i>rigour</i> ' and ' <i>as</i> ', which needs to be deleted.	Replace with; "...with the same rigour as Saham Toney...".
p49, para 187	The Local Plan Policy reference needs a space between the letters and numbers.	"ENV 09".
p51, para 192	There is an indent at the start of the paragraph, which is not consistent with the format of the rest of the report.	"192. This is another policy...".
p52, para 196	There are extra spaces between the words ' <i>the</i> ' ' <i>development</i> ' & ' <i>taking</i> ' and ' <i>163</i> ' ' <i>to</i> ', as well as between ' <i>access</i> ' & ' <i>and</i> ', which all need to be deleted.	"...will be safe for the lifetime of the development taking into account the vulnerability of the users and paragraph 163 to ensure that there is safe access and escape routes...".
p53, para 199 Recommendations	There is an extra space between ' <i>or</i> ' and ' <i>insert</i> ', and also between ' <i>"</i> ' and ' <i>or</i> ', which needs to be deleted.	"In P9.2 after " <i>or</i> " insert " <i>either capacity</i> " ..." and " <i>at the end</i> " or an acceptable ..."
	"...insert at the end " or an acceptable alternative provision has been agreed by the LPA in consultation with the foul drainage provider" – it would be useful to clarify the end of where?	Replace with "...insert at the end of this or an acceptable...".
Omission	It would be helpful if this report addressed the issue of where there are necessary consequential changes to the text, as a result of the recommended modifications to the policies e.g. changes to para numbers when text is deleted etc.	e.g. Minor modification of other text, punctuation and formatting (where necessary) to achieve consistency with the modified policies will be required.