

SDNPA response to the Pre Submission version of the updated Findon NDP

Page number	Section	Comments	SDNPA Recommendation
Pg.8	Plan Preparation Process	The following section doesn't provide details of how the plan has been prepared. It would be helpful to include details such as how and when a steering group was established, membership of the steering group, subsequent engagement activity and evidence gathering – including details of any reports commissioned by the steering group and how these have informed the Plan. A great deal of this information can be taken from Appendix 7. It would be appropriate for this information to be at the beginning of the plan to allow the reader to understand the context of the updated Findon Neighbourhood Plan (FNDP)	Include details of how the Plan has been prepared, and explain the reason for the updating of the FNDP at the beginning of the document.
Pg.9	Aims of the Plan	<p>This section would benefit from a new heading.</p> <p>The two statutory Purposes and Duty of the SDNPA should be stated in full:</p> <ol style="list-style-type: none"> 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. <p>The SDNPA also has a duty when carrying out the Purposes to: Seek to foster the economic and social well-being of local communities within the National Park. The Plan should acknowledge that there are limitations to what the FNDP itself can achieve. For example the aims of plan regarding transport cannot be easily addressed by the FNDP. These may be aspirations the Parish Council should seek to achieve though working with for example the Highways Authority. This is particularly relevant in relation to the aspirations set out in the Masterplan for the south west end of Findon. In section HD9.6 the plan makes clear that parts of the master plan are indeed aspirational and cannot be delivered directly by the FNDP</p>	<p>Give section on aims a clear heading. State Purposes and Duty in full.</p> <p>Acknowledge the purpose and limitations of a neighbourhood development plan.</p>
Pg. 10	Statement of Community Involvement	This section should provide a summary of the community engagement undertaken in order to demonstrate how the FNDP has been developed to reflect the views of the community. How were the community involved e.g. surveys, workshops, face-to-face meetings etc. and what were the issues identified by the community? Appendix 7 could be incorporated into this section or reference to appendix 7 made clearly at this section to give the reader a better understanding of the additional consultation that has been carried out to develop the updated FNDP.	Include reference to the summary of community engagement activity and issues raised as set out in Appendix 7

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Pg.11	Emerging Local Plan	It may be appropriate to set out in this section that the SDLP sets out land allocations to meet the housing requirement set by the South Downs Local Plan for Findon.	Consider including reference here to the proposed allocations in the SDLP
Pg.12	Local Planning Policy	The updated FNDP has deleted the text which referred to the plan being in general conformity with the 2003 Arun Local Plan. Given the uncertainty as to the timing of the adoption of the South Downs Local Plan, it may be that the examination of the Updated FNDP will be tested against the Saved Policies of the 2003 Arun Local Plan and the emerging SDLP, therefore it would be appropriate to reinstate the deleted text.	Consider reinstating deleted text to set out clearly which Local Plan policy the updated FNDP will be examined against
Pg.9	SDNP Local Plan	The inclusion of the SDNP Vision is welcome. It would be helpful to elaborate on Findon's role within the vision for the National Park. For example Findon is a thriving village, surrounded by open downs shaped by sheep grazing and is a village with strong cultural traditions still active today such as the sheep fair. Reference could also be made to the peaceful and tranquil places within the parish and the opportunities to enjoy these, for example via long-distance PRoW including the Monarch's Way.	Expand on how Findon relates to the vision for the National Park.
Pg.15 – 17	History of the Parish of Findon	Maps showing the development of Findon would be helpful here and would illustrate the growth of the village. In addition to Findon Park and Muntham Park, mention could be made of the parkland at Cissbury.	Include maps and photos to illustrate text. This will also help cut down on the amount of text required.
Pg.18	Community Profile	We recommend that the statistics here could be better presented in graphs or figures. Comparison with West Sussex or the South East would be more relevant and would help the reader to better understand the issues/challenges which are unique to Findon. Comparison with the National Average is not particularly revealing. It would also improve the Plan to include an interpretation of these figures and how they have influenced the development of the FNDP and the future aspirations of the community. Currently they just appear as a series of figures.	Use graphs to show population statistics. Make regional comparisons and provide interpretation of statistics.
Pg.19-21	Environment and Heritage	It would be helpful to include maps of key designations within the FNDP (possibly as appendices) rather than in the Evidence Base. 3.3.9 – Census data should be provided here to support the statement on housing mix. Details of dwelling size would also be useful here.	Includes maps of environmental designations. Include census housing data.
Pg. 22	3.4.5	Roads and traffic – it is agreed that traffic is a significant issue for the village and it is a significant challenge to address this issue whilst not losing any parking spaces. Given that the crossroads is a critical point in the road system and the core of the existing Conservation	Consider scope for public realm enhancement in core village to address traffic issues.

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		Area, some sort of public realm enhancement/ shared space type scheme should perhaps be considered. This notion could be incorporated into a Conservation Area Appraisal and Management Plan (CAAMP) prepared by the SDNPA and should be supported by FNDP Policy GA6. The FNDP could be more proactive and seek to do a feasibility study looking at the area with the aim of putting a funding package together and implementing the work.	
Pg.29	Policy BT2	Retention of Employment Land Strategic Policy SD35: Employment Land, of the SDLP protects all employment land in the National Park that is fit for purpose.	Review necessity of policy having considered SD35.
Pg.30	Policy BT4	Retention of retail frontages There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policies SD37 Town and Village Centres and SD52 Shop Fronts should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording appears to undermine one of the aims of the FNDP to protect local shops as the policy currently allows change of use if certain tests can be met.	Review necessity of policy and review policy wording.
Pg.31	BT6 & BT7	Shop front and business signage See emerging SD Local Plan policy SD52 Shop Fronts. Can policies BT6 and BT7 be combined? Also ensure there is no conflict between these two policies.	Review necessity of policy or review wording and combine policies.
Pg.31	BT8	Support recreational and tourism activities There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policy SD23 Sustainable Tourism should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording should also refer to adverse impacts on wildlife and cultural heritage.	Review necessity of policy or review policy wording
Pg.31	BT9	Communications infrastructure This policy suggests general support for communications infrastructure which includes telephone masts. Appropriate caveats should be included to protect the National Park special qualities. There will be a development management policy in the SD Local Plan on this topic. Draft policy SD44 should be reviewed to see where FNDP policy can provide additional details if necessary.	Review necessity of policy or review policy wording
Pg.34	GAI	Connection to sustainable transport, local networks and green infrastructure The current policy refers to the Community Infrastructure Levy (when adopted) the SDNPA	Review policy wording

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		Community Infrastructure Levy is now adopted so the wording of this policy needs to be updated.	
Pg.35	GA4	<p>A24 Improvements This is not a land use policy that would be used in the determination of the planning applications. The measures referred to in the policy are all highways works. In the examination of the original Findon NDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include GA4 as a land use policy within the FNDP This policy should also be reviewed (if it is to remain as an aspirational policy) in relation to the Masterplan for south west end of Findon and the aspirations for the A24 set out in that part of the plan. Currently the aspirations set out in the master plan are not reflected in this policy</p>	<p>Policy does not relate to land use matters and therefore should be removed from the main FNDP Consider reviewing policy in light of master plan proposals for south west end of Findon.</p>
Pg.35	GA5	<p>Traffic Management This is not a land use policy that would be used in the determination of the planning applications. The measures referred to in the policy are all highways works. In the examination of the original Findon NDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include GA4 as a land use policy within the FNDP</p>	<p>Policy does not relate to land use matters and therefore should be removed from the main FNDP</p>
Pg.38	CFW5	<p>Protection of assets of community value The final sentence of the policy needs clarifying – what is a ‘reasonable price’ and it is unclear what service trade uses are. Emerging SD Local Plan policy SD43 <i>New and Existing Community Facilities</i> should be referred to in reviewing this policy.</p>	<p>See SD Local Plan policy SD43 and revise policy wording.</p>
Pg.39	CFW6	<p>Local Green Space Further clarification is required in relation to Local Green Space 8. The text on page 75 suggests that this site is a ‘twitten’ and a Historic quiet lane along with the associated verges. It is assumed that the verge is what is proposed for Local Green Space designation, but this should be clarified in the text and supporting map. Local Green Space 9 also requires further clarification as to what is being designated? Consideration should be given to whether the designation of footpaths / ‘twittens’ is appropriate, especially as the Planning Practice Guidance clearly states that linear corridors should not be designated as Local Green Space simply to protect Rights of Way which are already protected under other legislation</p>	<p>Consider reviewing the policy text and map in relation to Local Green Space 8 and 9</p>

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Pg.39	CFW8	<p>Unlit Village status Clarification is required for the unlit village status. Further information is required to help explain this status and the implications for future planning applications. The policy should be reviewed in light of emerging SDNP Local Plan Policy SD8: Dark Night Skies</p>	Review or consider the need for the policy in light of emerging Local Plan Policy SD8: Dark Night Skies
Pg.40	ESI	<p>Gaps between settlements In the original FNDP this policy was removed from the plan by the Examiner and placed in a supporting document which set out aspirational policies, whilst the qualifying body may feel it is appropriate to include this policy within the updated FNDP, the points below should be considered.</p> <p>The Arun 2003 Local Gap policy will be superseded by the SD Local Plan. To future-proof this policy reference should be made to emerging strategic policy SD4 <i>Landscape Character</i> which refers to the protection of existing undeveloped gaps between settlements. If the Qualifying Body would like this local gap status to remain they should consider a specific policy to set out protection of gaps between settlements.</p> <p>The policy currently refers to map 2 which now appears to have been deleted in the updated FNDP. Clarification is sought as to whether Policy ESI will be retained. This is particularly important as the Local Gap as set out in the current FNDP and the Arun Local Plan will be in conflict with allocation HD10 which seeks to allocate the land for housing development, although it is within the current protected gap.</p> <p>The policy reference in the supporting text requires updating to refer to Policy SD4 not SD5 as currently stated.</p>	<p>Consider whether it is appropriate for this policy to remain in the FNDP given the issues highlighted below</p> <p>Review and future-proof policy.</p> <p>Consider whether this policy will remain in the updated FNDP given the allocation of housing site HD10</p> <p>Update policy reference</p>
Pg.40	ES2	<p>Surface water management The SDNPA is the approval body for SUDS and will make the decision on the suitability of sustainable drainage provision in consultation with the Lead Local Flood Authority (WSCC). There will be development management policy in the SD Local Plan on this topic. Draft policy SD50 <i>Sustainable Drainage</i> should be reviewed to see where FNDP policy can provide additional detail if necessary.</p> <p>Also, the policy is not clear when a Flood Risk Assessment will be required and appears to imply one is required for all development proposals which is not in line with NPPF paragraph 103.</p>	Review necessity of policy or review policy wording

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Pg.41	ES3	Protection of trees and hedgerows There will be development management policy in the SD Local Plan on this topic. Draft policy SD11 Trees, Woodland and Hedgerows should be reviewed to see where FNDP policy can provide additional detail if necessary. Policy ES3 is currently very generic and doesn't contain anything locally specific to Findon.	Review necessity of policy or review policy wording
Pg.42	ES4	Renewable Energy There will be development management policy in the SD Local Plan on this topic. Draft policy SD51 Renewable Energy should be reviewed to see where FNDP policy can provide additional detail if necessary. Policy ES4 is currently very generic and doesn't contain anything locally specific to Findon.	Review necessity of policy or review policy wording
Pg.43	ES5	Buildings and structures of character Title of text is missing the word 'Special'. Policy ES5 contains a list of "Buildings and Structures of Special Character" which were so identified by Arun DC. These are what are more normally referred to as "Local Listings". The criteria against which these buildings have been tested should be clearer and, ideally, should be those which the SDNPA will be using when we put together a SDNPA Local List. WE have recently invited the Parish Council to engage in the preparation of criteria for local listings, so the Qualifying Body may want to consider adopting the criteria identified by the SDNPA, or submitting these sites to the future consultation on local listings. It would be helpful to keep all the policy text and list of buildings in a single policy box.	Provide details of criteria for local listing. Put all policy text into a single text box.
Pg.43	ES7	Flint Walls It would be helpful to compliment this policy with example photos and a map of the flint walls identified for protection. Should the policy also support proposals to retain and enhance flint walls?	Support policy with photos and map of protected flint walls.
Pg.44	HDI	Spatial plan of the Parish The SDNPA actively promotes and supports community led planning, including the preparation of Neighbourhood Development Plans (NDP). The SDNPA invested considerable resources (financial and officer time) in the preparation of the current 'made' Findon Neighbourhood Plan. This plan chose not to allocate sites to meet Policy SD26 of the SDLP. The Findon NDP Examiner stated in his report that it could only proceed to referendum with several changes being made to the plan and on the understanding that the SDNPA would allocate sites for housing development in Findon in the SDLP. Therefore the SDNPA allocated two sites in Findon in the Pre-Submission version of the Plan namely SD71: Land at Elm Rise, Findon and	The South Downs Local Plan Submission version (SDLP) proposes approximately 28 dwellings to be provided in Findon, excluding windfall development. This figure reflects the capacity of the two sites proposed for allocation in the SDLP, and

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		<p>SD72: Soldiers Field House, Findon. Following this, the Qualifying Body indicated that they were not supportive of the SDLP proposed allocations and would seek to update the FNDP, to include housing allocations. This decision came at a relatively late stage in the preparation of the SDLP. A member of the FNDP addressed the Planning Committee in June 2017 when it considered the draft Pre-Submission Local Plan. Members did not remove any of the Local Plan allocations from the Plan. The SDLP was submitted to the Planning Inspectorate in April and includes two site allocations for Findon.</p> <p>This presents the unusual situation whereby the updated Pre-Submission FNDP and the Submission SDLP are proposing different housing allocations to meet the housing provision figure set in Policy SD26 of the SDLP. The updated FNDP clearly states that the site allocations proposed by the FNDP are not in addition to those proposed by the SDNPA, but are presented as alternative housing allocations. This is matter that the Local Plan Inspector may choose to raise in his Matters and Issues that are due shortly. It is also likely that it is a matter that will be raised by the FNDP Examiner if the Plan reaches examination. Legal advice has been sought on the matter which we hope can be provided to Planning Committee as an update.</p> <p>We set out the SDNPA position in relation to the proposed site allocations below, however, it is worth highlighting at this stage the potential risk in FNDP seeking to allocate sites in addition to the SDLP allocations. The updated FNDP includes four site allocations to meet the housing provision figure set in the SDLP. These are different sites to those allocated in the Submission SDLP. There is a risk that all proposed allocations could be allocated in the respective plans and in turn granted planning permission for development. This would result in a much higher level of development for the settlement of Findon than that proposed as appropriate in the SDLP.</p> <p>The SDLP also proposes an alternative amendment to the Settlement Policy Boundary to that proposed in the FNDP. This also presents a risk that all proposed modifications to the Settlement Boundary could be agreed resulting in significantly higher levels of growth for the settlement.</p> <p>In conclusion it is considered that the Qualifying Body should consider carefully their decision to progress with the updated FNDP, given the risks set out above. This matter is likely to be considered in the examination of the SDLP, however, a decision may not be forthcoming in time for the submission of the updated FNDP. These concerns have been made clear to the Qualifying Body previously in correspondence.</p>	<p>should therefore be carried through to the FUNDP to ensure consistency with the SDLP</p>

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45	HD1.5	This paragraph should be amended to reflect the SDLP Strategic Policy SD27: Mix of Homes, and in particular paragraph 7.40 of the supporting text to SD27. We would encourage that the FUNDP sets out a clear approach based on local evidence, or alternatively that the housing mix set out in Policy SD27 is used, subject to robust local evidence of an alternative housing mix being provided at application stage. The current approach risks uncertainty and a potentially weak negotiating position at the application stage.	Amend text to reflect the approach set out in Policy SD27 of the SDLP
Pg.46	HD2	<p>Local Connection</p> <p>As currently worded policy HD2 will only require the local connection criteria to be applied on the first occupation of the affordable home, therefore the local connection will not remain in perpetuity.</p> <p>Recommend criteria (f) is a separate stand-alone policy regarding agricultural dwellings. Such a policy may not be necessary as it is already sufficiently covered by Local Plan policy.</p> <p>Any Local Connection policy should be in line with Arun DC's local connection criteria which in the draft Arun Local Plan states:</p> <p><i>The Local Planning Authority will base its assessment of identified housing need on the Housing Register and other available up-to-date housing needs assessments.</i></p> <p><i>Development will be considered to contribute towards meeting an identified need, where it will provide accommodation for any of the following:</i></p> <ul style="list-style-type: none"> • <i>existing residents of the parish requiring separate accommodation;</i> • <i>persons who have long standing family links (immediate family only e.g. parent, sibling or adult child and step relationships) with the parish;</i> • <i>Grandparents, grandchildren, aunts or uncles and non-adult children will be included only where the District Council considers it necessary for the applicant to be accommodated within the Parish in order to provide or receive medical or social support to or from such a relative;</i> • <i>persons with full time employment based within the parish;</i> • <i>persons who have had to move away from the parish due to a lack of affordable housing, but would like to return;</i> <p><i>Permission granted in these cases will be subject to a S106 agreement which includes safeguards that the scheme provides for the identified local need and will continue to do so in perpetuity.</i></p>	<p>Consider review of policy wording.</p> <p>Consider removing of specific policy criteria</p> <p>Check conformity with housing authority approach to local connection policy</p>
Pg.46	HD3	<p>Live / Work units</p> <p>It is not clear where this policy applies – within the settlement boundary or elsewhere?</p> <p>Caveats should be included to protect amenity and prevent against the loss of large areas of garden/green space.</p>	Review policy wording.

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		HD3.3 reads as policy criteria and should be included in the policy text rather than the supporting text.	
Pg. 48	HD6	Edge of Boundary Houses and Paddocks This is not a land use policy that would be used in the determination of the planning applications. In the examination of the original FNDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include HD6 as a land use policy within the FNDP	Policy does not relate to land use matters and therefore should be removed from the main FNDP
Pg. 49	HD7	Design of Development The Qualifying Body should consider reviewing the Village Design Statement (VDS) and submitting it to the SDNPA for consideration as a Supplementary Planning Document, to ensure it is afforded the maximum weight in the determination of planning applications. Currently the VDS will only be considered a material consideration through its reference in the FNDP. The policy wording refers to the Village Design Statement at Appendix 4, the correct reference would be to Appendix 5. Include Village Design Statement as part of the Evidence base, or make it a full appendix to the FNDP.	Consider a review of the VDS Correct reference to appendix Include a full copy of the VDS with the plan or make the appendix available on the webpage
Pg.50	HD9	Masterplan for the south west end of Findon The proposed masterplan is noted. Substantive comments are provided in relation to the allocation sites below. The SDNPA has a major in-principle concern regarding the landscape impact of the scale and location of development envisaged by the masterplan, particularly in terms of the significant change to settlement form and extension of built form towards Worthing (Findon Valley) along the A24 corridor. The area is also on the opposite side of the A24 and is therefore largely detached from the settlement form, notwithstanding aspirations to mitigate the barrier effect of the A24. It is also noted that elements of the masterplan are aspirational, and we would therefore question the overall deliverability of what is envisaged.	Qualifying body consider whether it is appropriate to progress these site allocations given the progression of the SDLP
Pg. 53	HD10	Southern part of Paddocks at Garden Centre This site forms the southern part of SDNPA SHLAA Site AR008, and is not considered suitable for allocation. The site is removed from the existing settlement of Findon, with the barrier of	Consider deletion of Policy HD9

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		<p>the main A24 dual carriageway being particularly problematic. Development would not relate well to the existing settlement in terms of access to local services, and would not fit with the character of the settlement form as currently exists. SDNPA also questions the effectiveness of part 2 of the policy, which suggests significant uncertainty as to whether the site is or is not allocated, or the form that development would actually take.</p> <p>This allocation conflicts with Policy ES1 of the updated FNDP. Policy ES1 (Gaps between Settlements) resists development in this important gap. It is noted that map 2 (showing the gap) is deleted from the updated FNDP, however, policy ES1 remains in the body of the updated FNDP, and therefore conflicts with this proposed allocation. C</p>	
Pg. 57	HD11	<p>Former allotments north of the Quadrangle</p> <p>The Former Allotments site (SDNPA SHLAA site AR009) is not considered suitable for allocation. The site does not relate well to the existing settlement pattern, and the main A24 dual carriageway creates a major barrier that divorces the site from the main settlement. The SHLAA landscape assessment found the site to have medium-high landscape sensitivity, and contributes to the local gap between the village and Worthing. The assessment concluded that development on the site would have a potential adverse impact on the character and appearance of the landscape.</p>	Consider deletion of Policy HD10
Pg. 61	HD12	<p>Housing allocation on land north of Nightingales</p> <p>The land north of Nightingales is not considered suitable for allocation. There are potential significant issues of poor amenity for future occupiers, due to the site's close proximity to the heavily trafficked A24 (a 50mph speed limit is in operation at this point). There is also potential for negative impact on the landscape, as the built form of the settlement would be extended out beyond its current natural boundary at this point.</p> <p>Policy HD12 indicates that a successful development would rely on undergrounding of overhead power cables, new vehicle access and parking, proposals to mitigate the effects of traffic noise and a very high proportion of affordable housing which represents a potentially significant constraint to delivery. Therefore it is considered that the sites proposed for allocation in the SDLP are more suitable. If the issues highlighted (and potentially others) can be mitigated, it is considered that the site may have scope to come forward as a rural exception site, given it is a greenfield site outside the existing settlement boundary.</p>	Consider the deletion of Policy HD12. Further consideration could be given to the site coming forward as a Rural Exception site.
Pg.65	HD13	<p>Housing allocation on the former fire station site</p> <p>The former Fire Station is a site of 0.1 hectares within the settlement boundary, which is currently in use as an ambulance station. It is considered likely to be too small a site to</p>	Consider the deletion of Policy HD13, allowing the site

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		comfortably accommodate 5 or more dwellings, and therefore should not be considered for an allocation site. The site is within the settlement boundary, hence any future residential development on this site would be acceptable in principle and classed as windfall development.	to come forward as Windfall development in the future
68	HD14	Extension of Settlement Boundary The SDNPA has in-principle concerns regarding the allocation sites proposed in the FUNDP, and has itself proposed two sites in the SDLP on the edge of the settlement that will necessitate a revised settlement boundary. It follows that the SDNPA does not support the settlement boundary proposed in Policy HD14 and shown on Map 2A.	Consider the deletion of Policy HD14
Pg.69	Supporting Evidence	Dates should be given for evidence documents. Supporting evidence should be made available on the NDP website. Background documents – South Downs National Park <u>Partnership</u> Management Plan (2012). Remove repetition of Flood and Water Management Act. Also include reference to the Pre – Submission South Downs Local Plan and DEFRA Vision & Circular on English National Parks.	Provide links to supporting evidence.
Pg.72	Appendix 2	Show Local Green Spaces on a map in the document. LGS protection of PRoW is unnecessary as they are afforded separate protection. We'd also question whether PRoW and small areas of verge meet the LGS criteria as set out in the NPPF, in particular can such verges be considered to be demonstrably special.	Review Local Green Space designations, particularly LGS 8 & 9 to ensure they comply with the requirements of the NPPF.
Pg. 77	Appendix 4	It would assist the reader if there was a map showing the location of the flint walls to allow applicants / decision makers to clearly see where Policy ES7 should be applied	Provide map to assist the reader in applying Policy ES7
Pg. 85	Appendix 5	Reference to policy HD8 is incorrect, the reference should be to HD7	Amend wording
Pg. 87	Appendix 7	Consideration should be given to the inclusion of this text in the plan preparation section, where it set the context for the updated FNDP for the reader	Consider moving text to the main body of the FNDP
Page 91	Map 2.	This map is shown as deleted in the updated FNDP. However Policy ES1 remains in the updated FNDP, therefore the reference to Map 2 remains in the body of the FNDP, although it appears the map is proposed to be deleted	Clarify whether Map 2 should be reinstated to support Policy ES1
Pg. 90, 92, 93, 94	Maps	It is proposed that all the material shown on these individual maps is included on one policies map so it is easy for the reader to establish where spatial policies are mapped	Consider the preparation of a composite policies map to support the FNDP

