

# Mansfield District Council

## Local Plan Examination

### **Main Matter 3**

Whether or not the plan will secure high quality sustainable design and safeguard and enhance the districts landscape character, natural and historic environment

### Mansfield District Council Submission

Date 30 April 2019

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**Mansfield**  
District Council



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## Local Plan Examination Matter Statement

May 2019

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Main Matter 3 – Whether or not the plan will secure high quality sustainable design and safeguard and enhance the District’s landscape character, natural and historic environment

*Issue – Place Making and High Quality Design*

**Q1. Would Policies P1 – P4 secure inclusive design and accessible environments as required by the NPPF?**

1. Yes Policies P1- P4 accord with the National Planning Policy Framework<sup>1</sup>, in summary:
  - P1 – requires applicants respond to Building for Life 12 and for non-residential development the Mansfield Place Making principles, this is in accordance with both the NPPF 2012 and 2019.
  - P2 – requires applicants for proposals over 50 dwellings or over 5,000 square metres or more to submit a Health Impact Assessment against the checklist in Appendix 4 of the Local Plan, the assessment includes criteria that are designed to ensure developments are inclusive for all and accessible.
  - P3 – seeks to ensure that new developments, especially new residential developments, connect well to the surrounding areas, and are easily navigated by users; this is in conformity with para 61 of the NPPF.
  - P4 – is intended to ensure that large development sites that are likely to come forward in a number of phases are delivered comprehensively and will therefore ensure that any open space contributes to the wider green infrastructure network and that the level of growth can be adequately accessed by both pedestrians and vehicles. The masterplan requirements for sites over five hectares or 150 dwellings have been designed to reflect the requirements of the NPPF para 58, Building for Life 12 and the Mansfield Place Making Principles.

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<sup>1</sup> All references to the NPPF are to the 2012 version, unless stated.

**Q2. Is the requirement for a health impact assessment in Policy P2 justified and what would be required?**

2. The requirement is considered to be consistent with one of the overarching principles of the NPPF in providing for healthier communities. Para 17 requires local planning authorities to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. The council has adopted the Spatial Planning for Health and Well- Being of Nottinghamshire 2016 guidance<sup>2</sup>. Applicants will be required to complete the checklist included within Appendix 4 of the Local Plan (as recommended by the 2016 guidance). Completing the checklist will highlight ways in which developments can be improved to achieve health outcomes.

**Q3. Is Policy P3 criteria (d) consistent with the overall aim of the policy to promote sustainable modes of transport?**

3. Yes, the purpose of criteria d is to ensure that there is adequate provision to allow for off-street car parking to ensure that the street scene remains attractive and useable for residents to walk and cycle to their destination, thus reducing conflict between vehicles and pedestrians. This is in accordance with paragraph 35 of the NPPF.

**Q4. Is the requirement in Policy P4 for a masterplan on large sites (5 hectares or more or 150 dwellings) and public involvement in the design of major development proposals justified and how will this be secured and delivered? Should the considerations set out in paragraph 4.36 be incorporated into Policy P4?**

4. The requirement for large sites to submit a masterplan is justified as, given the overall scale of these sites, a masterplan will provide a clear framework. Public involvement in the design of major developments is set out within para 66 of the NPPF. The requirement for community engagement into the master planning process will need to be evidenced as part of any future planning application, with any consultation carried out by the developer before submission of the application to the local planning authority. It is proposed that para 4.36 in the supporting text is incorporated into the policy at part two to give greater clarity to the applicant.

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<sup>2</sup> <https://www.nottinghamshireinsight.org.uk/f/63761/Library/Environment/General/> (scroll to bottom of page for relevant link)

**Q5. Does Policy P6 set out a positive approach to reflect the requirement for high quality and sustainable design set out in Policies P1 – P4?**

5. Yes, Policy P6 will need to be read alongside part one of Policy P2. Policies P1, P3 and P4 relate to major developments only. The council currently has interim planning guidance for the design of extensions to dwellings<sup>3</sup> which we will consider updating.

**Q6. Does Policy P7 provide clear and robust guidance on how the impact of new development on amenity will be assessed and how will ‘appropriate standard’ and ‘unacceptable level’ be defined?**

6. Yes, Policy P7 sets out how the amenity impacts of proposals will be assessed for both existing and future uses, alone and in combination. The supporting text at 4.51 sets out that impacts should firstly be avoided but then identifies examples of how impacts may be addressed.
7. The appropriate standard and unacceptable level will need to be determined by the decision maker on an individual case by case basis and will be informed by consultations with experts from different disciplines and organisations as well as those residents and occupiers that are affected.
8. Mansfield District Council has interim planning guidance which covers some of the issues around amenity mainly in relation to extensions to dwellings (referred to above). It is proposed as part of the Design Supplementary Planning Document that more guidance on amenity will be given to future applicants.

**Q7. Is Policy P8 consistent with the statutory test in relation to Conservation Areas?**

9. Yes, part 2 of the policy states that where development proposals affect heritage assets, changes to shop fronts and signage will not be permitted if they fail to contribute to the preservation and enhancements of the area’s character, appearance and setting. This is in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Please also see modification M26.

*Issue – Are other environmental policies soundly based and justified by the evidence?  
(Policies NE1 – NE4, HE1 – HE2)*

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<sup>3</sup> <http://www.mansfield.gov.uk/CHttpHandler.ashx?id=7085&p=0>

**Q8a. Will Policy NE1 be effective in protecting and enhancing the landscape character of the District as set out in the Mansfield Landscape Character Assessment (ENV1 & ENV2)?**

10. Policy NE1 is positively prepared and effective in that it allows for sustainable development to take place, as long as it is sympathetic to district's landscape character. This includes conserving and enhancing key characteristics unique to specific landscape policy zones through recommended policy actions. A landscape policy zone (LPZ) is an individual landscape area, within a wider national character area, which has a unique sense of character and identify.
11. NE1 is a criteria-based policy that draws upon a strong evidence: Mansfield Landscape Character Assessment, 2010 (ENV1) and Mansfield Landscape Character Assessment Addendum, 2015 (ENV2); these are based on a robust methodology and also provide guidance for assessing and addressing key landscape policy zone actions (e.g. conserve, enhance, restore, create, etc.). It also draws upon National Character Areas as defined by Natural England<sup>4</sup>.
12. In order for development to be supported, Policy NE1 requires proposals for development to demonstrate how:
- key landscape policy actions can be realised through the development;
  - important landforms, assets and setting will be conserved and enhanced;
  - it identifies and mitigates individual and cumulative impacts on character and visual appearance; and
  - it contributes to restoring the landscape and removing any detracting features.
13. Conversely, if development does not satisfactorily demonstrate that these will be addressed, this will weigh against the scheme within the wider planning balance. Policy actions with 'conserve' indicate those landscape character areas in good and coherent condition and high sensitivity. The supporting text (paragraph 10.7) in the plan sets out that for development proposed within these areas, it would be advantageous to direct development elsewhere or require a higher level of design.
14. This policy approach is similar to Policy NE1 (Landscape character) in the Local Plan Consultation Draft (under Regulation 18)<sup>5</sup>, which was supported by Nottinghamshire County Council, Historic England and Natural England<sup>6</sup>.
15. Policy NE1 is in accordance with the NPPF (paragraphs 109 and 113).

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-east-midlands>

<sup>5</sup> <http://www.mansfield.gov.uk/localplan#Local Plan Consultation Draft>

<sup>6</sup> Mansfield District Local Plan 2013-2033 Consultation Statement: Regulation 22 (1)(c), 2018, page A2:59.

16. A proposed main modification (M99)<sup>7</sup> to Policy NE1 wording helps clarify how the policy should be applied to development within landscape policy zones:

“Development **within in a landscape policy zone**, in accordance with ....”

**Q8b. Is the geographic interpretation of Policy NE1 clear on the Policies Map, in particular the Landscape character policy zones?**

17. The geographical interpretation of NE1 is informed by National Character Area (NCA) boundaries for the Sherwood NCA and Southern Magnesian Limestone NCA (as defined by Natural England) and county-based landscape policy zones (LPZ), as defined in the Mansfield Landscape Character Assessment Addendum, 2015 (ENV2). Part 1 of Policy NE1, makes reference to NCAs and LPZs in the policy wording.

18. Due to the amount of detail associated with the NCAs and LPZs (e.g. policy actions, reference numbers) and the need to provide a clear interpretation of other policies on the Policies Map, these boundaries were not included on the Policies Map. If included on the Policies Map, it would make the map difficult to read and interpret and not aid its use or implementation.

19. The NCAs boundaries are available elsewhere on Defra’s ‘Magic Map’ website<sup>8</sup>. The LPZ boundaries are located within ENV2. In the pdf version, these can be viewed at a reasonable resolution with underlying OS baseline mapping.

20. A modification is proposed to include LPZ boundaries and references within Figure 10.1 (page 171) of the Local Plan.

**Q9. How have landscape character and other natural and historic environment designations been taken into account in identifying site allocations?**

21. Protecting and enhancing the natural environment is a key aim of the planning system and the Local Plan.

22. The NPPF sets out that, where consistent with other policies in the NPPF, local plans should allocate land with the least environmental or amenity value, (paragraph 110). This suggests a sequential approach but also involves requires that any harm (such as that to the landscape or the loss of any agricultural land) is weighed against other benefits of the site.

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<sup>7</sup> Schedule of Proposed Main and Minor Modifications to the (Submission) Local Plan, 2018 (S2)

<sup>8</sup> <https://magic.defra.gov.uk/>

23. Sites have been assessed based on outcomes/recommendations from a suite of assessments (see summary table below). The process is set out in the Site Selection Paper (H6)<sup>9</sup>. This involved a balanced approach which weighed up the information provided from these assessments in relation to the significance of impact; the opportunity to avoid, mitigate impacts; and opportunities for wider enhancements to green infrastructure network.
24. The table overleaf summarises the key evidence documents that informed how landscape, and other natural and historic environment designations were taken into account in identifying allocations.

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<sup>9</sup> Sections 6 and 7.



Evidence	How landscape character (i.e. landscape policy zones) and natural and historic environment designations have been taken into account
Housing and Economic Land Availability Assessment (HE1)	<p>Potential impacts on designated nature conservation sites (ecological and geological) from all development sites (housing, employment and retail) submitted through the HELAA process were assessed through two key stages. This was to identify a pool of reasonable alternatives.</p> <p>Stage 1 of the HELAA process (HE1, paragraph 4.7.1) considered the proximity to European designated sites, SSSI (including SSSI Impact Risk Zones, Local Nature Reserves (LNR), and proposed Local Green Space. Any sites within these designations (and within ancient woodland) were discounted and any sites within close proximity were carefully considered at Stage 2 (see HE1 – paragraph 4.7.2/Table 4.1, pages 9-10).</p> <p>Potential impacts on heritage assets from all sites put forward were assessed through the HELAA process which considered the following criteria: 1) the proximity of the site to heritage assets (both designated and non-designated) and archaeology; 2) whether the site is located within the setting of a heritage asset; and 3) any potential to enhance heritage assets. This formed part of the ‘suitability criteria’ within Stage 2 (see Table C2 of Appendix C, page 30).</p> <p>In addition to assessing the availability, achievability and suitability of sites, Stage 2 of the HELAA process was informed through a desk-based review to consider a wide range of impacts and opportunities (paragraphs 5.6.1 and 5.6.2), including contribution to improving biodiversity.</p> <p>Stages 1 and 2 were informed through expert advice sought externally and in-house, including, for example: Historic England, Natural England, consultants and in-house Sustainable Planning Officer and Conservation Officer. Existing evidence base documents (e.g. Strategic Flood Risk Assessment (C1) and Addendum to the SFRA (C2)) also informed this.</p>
Sustainability appraisal process	<p>Sites were assessed for negative and positive impacts on the natural and historic environment against key sustainability objectives identified in the Mansfield Pre-Submission Sustainability Appraisal - Appendices, 2018 (S8c, Appendix F); this framework was informed through consultation with Natural England, Historic England and the Environment Agency. SA Objectives 6 Biodiversity (a – designated sites &amp; b –enhancement) and 7 Built and natural assets (a – heritage &amp; b – landscape) were used to assess potential impacts on the natural<sup>10</sup> and historic<sup>11</sup> environment designations and landscape policy zones.</p> <p>The results of the Sustainability Appraisal were included on the site proformas within the Site Selection Paper and</p>

<sup>10</sup> SAC and buffers, Possible future SPA and buffers, NNR, SSSIs and SSSI IRZs, LNRs, LWS, LGS and Ancient Woodland.

<sup>11</sup> Listed buildings, Conservation areas, Scheduled Ancient Monuments, Registered Park and Gardens, and Locally listed heritage assets (Buildings of Local Interest).

	<p>helped inform the choice of sites in the plan.</p> <p>These build on previous site assessment work (i.e. Regulation 18 stage). Mansfield Pre-Submission Sustainability Appraisal - Non-Technical Summary, 2018 (S8b, Section 6.4 page 24) clearly sets out how housing, employment and retail sites were appraised. Table 6.3 (pages 25-27) summarises the assessments of sites.</p> <p>Section 7.4 (page 33) concludes that mixed effects are predicted for biodiversity. Sites generally score (-) or (--) against Objective 6a but also (+) or (++) against Objective 6b. Advice was sought with Natural England concerning SSSIs, SAC and the ppSPA which informed site allocation and policy wording for policy H1. Overall, the net effect on biodiversity is predicted to be a minor positive effect in the long term (paragraph 7.4.3).</p> <p>A number of sites scored (-) or (--) against Objective 7a and these were subject to a Heritage Impact Assessment and advice sought with Historic England to inform site allocation and policy wording for policy H1. Overall, significant positive effects are predicted with regards to the historic environment (paragraph 7.5.3).</p> <p>No allocated sites scored red (--) against Objective 7b. Reasons for sites being rejected included unacceptable impacts on landscape and the built environment (paragraph 6.4.6). A minor effect is predicted over all regarding landscape (paragraph 7.5.2).</p> <p>The Mansfield Local Plan Sustainability Appraisal Report Technical Appendix (S8d) - Technical Appendix A - includes site appraisal proformas with give more detailed summary comments which helped to inform the site selection process.</p>
Habitat Regulations Screening Report process	<p>Preferred housing, employment and retail sites were assessed<sup>12</sup> in relation to their potential impact on the Birklands and Bilhaugh SAC and the Sherwood possible potential SPA (ppSPA) at the Preferred Options Stage (Regulation 18). This process assessed strategic sites and edge of settlement sites to help inform the allocations to be included within the Publication Draft Local Plan (Regulation 19). This HRA interim report was important for assessing the scale or proximity of a particular development site may mean a site-specific recreational pressure effect (for example) could arise.</p> <p>A simple grading process<sup>13</sup> was used to classify preferred sites based on a sliding scale of 0 (no constraint posed) to 3 (probable showstopper i.e. issues are presented that are likely to be irresolvable). No sites scored a 3, as to discount sites<sup>14</sup>. Appendix A of the Interim HRA Scoping Report (May 2017) provides comments on the sites assessed.</p>

<sup>12</sup> [Interim Habitats Regulations Assessment Scoping Report \(revised site allocation preferred options\) May 2017 – Mansfield District Local Plan.](#)

<sup>13</sup> Paragraph 6.1 of the Interim HRA Scoping Report (May 2017).

<sup>14</sup> Paragraph 6.3 of the Interim HRA Scoping Report (May 2017).

	This process <sup>15</sup> concluded that no likely significant effects on the Birklands and Bilhaugh SAC will arise from the Mansfield Local Plan either alone or in-combination with other plans or projects. It also concluded that no adverse effects on the Sherwood ppSPA will arise from the Mansfield Local Plan either alone or in combination with other plans and projects.
Heritage Impact Assessment 2018 (HT1a and HT1b)	In addition to the HELAA and the SA, this evidence document, informed through consultation with Historic England, provided an additional, detailed site-based assessment of preferred sites to fine-tune the selection of allocated sites and to inform policy wording (policies H1 and RT6) within the Publication Draft Local Plan and Submission Local Plan.
Landscape Character Assessment 2010 (ENV1) and Addendum 2015 (ENV2)	Preference was given to sites within lower value landscape policy zone actions, on balance with all other considerations. This is explained in the Site Selection Paper (H6), Paragraph 7.23 and Table 5 (page 11).

<sup>15</sup> See Section 6 (Overall Conclusion), pages 62-64 of HRA Screening Report for the Publication Draft Local Plan (S10).

**Q10. How would any net gain in biodiversity sought through Policy NE2 be secured, measured and monitored?**

25. The NPPF (para 9) asserts that moving from net loss to net gains in biodiversity contributes to sustainable development and that the planning system needs to contribute towards achieving this<sup>16</sup>. The Government recently conducted a public consultation on a biodiversity net-gain metric and the Chancellor included a pledge in the Government’s Spring Statement (March 2019)<sup>17</sup> to introduce a requirement for all developers to generate biodiversity net-gain through all projects.
26. The question of whether a proposed development can deliver an appropriate net gains will likely be dependent on a number of factors and will need to be considered on a case by case basis. But there are some key principles that can be applied across all sites<sup>18</sup>. It will be important that both quantity and quality of biodiversity gains are secured.
27. Guidance for the implementation of Policy NE2 will be provided in a Green Infrastructure and Biodiversity SPD which will be informed through consultation with relevant organisations (e.g. Natural England and the Environment Agency) and developers (e.g. through the council’s developers forum). Defra’s updated ‘biodiversity metric’ is a viable model which the council could adopt and integrate within the SPD.
28. Examples of what the SPD could draw from include: 1) Building with Nature Standard<sup>19</sup>; 2) Biodiversity Net Gain: good practice for developers<sup>20</sup> 3) Defra’s net-gain metric<sup>21</sup>. These are all included in Table 10.3 (page 180) in the Local Plan.
29. It is recognised that the following existing resources (see table below) can be drawn upon to secure, measure and monitor net gain in biodiversity.

Actions	Areas to address within SPD (examples of)
Secure	<ul style="list-style-type: none"> <li>• Scheme of Validation – to set clear requirements so that developers know what information to submit with planning applications</li> <li>• To define ‘net-gain’ by providing and defining key principles to support good practice.</li> <li>• Case studies – to provide some examples of what the council is looking for.</li> <li>• Guidance within Green Infrastructure SPD will also support the creation and enhancement of ecological networks.</li> <li>• Provide a one-stop-shop for tools and resources to guide the planning application</li> </ul>

<sup>16</sup> NPPF paragraphs 109 and 152.

<sup>17</sup> <https://www.gov.uk/government/news/spring-statement-2019-what-you-need-to-know>

<sup>18</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

<sup>19</sup> <https://static1.squarespace.com/static/59e75e8fb1ffb608dfc7f9b0/t/5b223f8c352f532eb0df06b4/1528971152784/Building+with+Nature+User+Guide+v1.1.pdf>

<sup>20</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

<sup>21</sup> <http://publications.naturalengland.org.uk/publication/602020453888192>

	process.
Measure	<ul style="list-style-type: none"> <li>• Incorporate Defra’s revised ‘biodiversity metric’ or similar.</li> </ul>
Monitor	<ul style="list-style-type: none"> <li>• Require monitoring as part of a development site’s submitted management plan. This requirement can be monitored upon submission of the application.</li> <li>• Indicators relevant to NE2 to help towards monitoring net gains include: ‘details of habitat areas created by new development’; ‘percentage of major applications with management plans’; and percentage of planning applications contrary to policy.</li> </ul>

30. Overall, measures to support net-gains in biodiversity will be secured through planning conditions and Section 106 contributions.
31. A modification to the supporting text (paragraph 10.11) could reference Defra’s metric and key principles as set out in the ‘Biodiversity Net Gain: good practice principles for development’<sup>22</sup>, to clarify the approach in Policy NE2. This would more explicitly set out expectations for development, of which the planned SPD would provide guidance.

**Q11a. Should Policy NE2 paragraph 2 include reference to the Sherwood Forest potential Special Protection Area?**

32. No, as the Sherwood possible potential Special Protection Area (ppSPA) is not a site of European significance (i.e. neither an SPA nor pSPA, nor formally proposed for designation) at the point in time.
33. The Sherwood ppSPA is an informal, but locally accepted, reference to a wide habitat area stretching from Worksop to Nottingham. It supports breeding birds, nightjar and woodlark, of European significance.
34. Whilst the area meets some of the criteria to designate it as an SPA, no conclusion has been made to formally propose its designation, or to begin the consultation process for potential designation, to date. Natural England issued a guidance note (SA11), advising local authorities to adopt a risk-based, precautionary approach to plans and projects. By doing so, this will ensure that reasonable and proportionate steps have been taken in order to avoid or minimise, as far as possible, any potential adverse effects from development on the breeding populations of nightjar and woodlark in the Sherwood Forest area. This also ensures that any future need to comply with the provisions of the 2010 Regulations is met with a robust set of measures already in place.

<sup>22</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

35. The council has adopted a risk-based, precautionary approach to the Sherwood ppSPA by assessing it as part of the HRA Screening process (SA10). The HRA Screening Report at the Regulation 18 (consultation draft stage) recommended specific policy wording which has been incorporated into the Local Plan in relation to NE2 (2), NE2 (5) and NE3.
36. In the event that the Sherwood habitat area (i.e. ppSPA) is formally designated as a potential SPA (pSPA) or full SPA, NE2 (paragraph 2) would apply, but in the meantime, Policy NE2(5) applies. Sites of European significance are defined in the Local Plan's supporting text (Table 10.2). NE2 (paragraph 5) responds to Natural England's advice note (SA11). Natural England support this approach (SA10a).

**Q11b. Does Policy NE2 afford sufficient protection for 'irreplaceable habitats'?**

37. Policy NE2 is consistent with paragraph 118 of the NPPF. However, it is considered appropriate to reflect the wording of the 2019 NPPF, paragraph 175c, which provides greater protection with regards to irreplaceable habitats (i.e. ancient woodland and veteran trees).
38. Modification (M103) within Schedule of Proposed Main and Minor Modifications to the (Submission) Local Plan (S2) recommends that policy NE2 (6) is amended to take account of this.

**Q12. Is the wording of Policy HE1 paragraph 2 consistent with the statutory test that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area?**

39. Yes, part 2 of the policy makes specific reference to preserving or enhancing the character or appearance of the Conservation Area, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The policy has been prepared in consultation with Historic England and agreed as part of the Statement of Common Ground (DT7).

**Q13. How have landscape character and other natural and historic environment designations been taken into account in identifying site allocations?**

40. Answered at Q9 above.

**Q14. Overall is the plan’s strategy to secure high quality design and safeguard landscape character and the natural and historic environment positively prepared and are any main modifications necessary for soundness?**

41. The council considers that policies that contribute to plan’s strategy to secure high quality design and safeguard landscape character and the natural and historic environment are positively prepared. They contribute to necessary safeguards whilst being consistent with and contributing to achieving sustainable development, as set out in the Local Plan as required by the NPPF (paragraph 182). Policies P1 to P8 and NE1 to NE4 and HE1 and HE2 encourage development to secure positive gains, for example: health and wellbeing, community cohesion, biodiversity, historical and environmental character amenity, etc., whilst not being burdensome to the delivery of development as confirmed through the Sustainability Appraisal (SA8a) and the Whole Plan Viability Assessment (V2). These policies help support the development of new places where people want to live, work and spend their leisure time which will in turn contribute to the wider regeneration of the district.
42. The Schedule of Proposed Main and Minor Modifications to the (Submission) Local Plan, 2018 (S2) proposes some key main modifications, in relation to policies P1 to P7, NE1 to NE5 and HE1 to HE2, as set out in the table below:

Modification reference	Policy modified	Explanation
M15, M16	P1	To correct errors and clarify the approach.
M24	P7 (Part 2)	To respond to comment (PD 72) and clarify the approach.
M25/ M108	P7 (supporting text para 4.53 / NE4 (supporting text para 10.39)	To respond to statutory consultee comment (Nottinghamshire County Council, PD/15) to ensure wording aligns with evidence.
M26	P8	To respond to comment (PD/2) to ensure the policy is inclusive of all heritage assets and reasonable in its approach.
M99	NE1	To insert wording omitted in error.
M103	NE2 (Part 6)	To align with changes in NPPF (2018) paragraph 175 (c) to reflect change in wording which further strengthens protection of irreplaceable habitats.

Further to this, an additional modification are proposed:

- P4 - it is proposed that paragraph 4.36 in the supporting text is incorporated into the policy at part two to give greater clarity to the applicant.