

North York Moors National Park Authority Development Plan Working Group

19 August 2016

Preparation of a New Local Plan for the National Park

1. Purpose of the Report

- 1.1 To outline matters for discussion at the Development Plan Working Group on 19 August
- 1.2 To Note the publication of the 'First Steps' consultation documents, subject to any amendments requested at the meeting
- 1.3 To note the publication of the Strategic Housing Market Assessment (SHMA) prepared by consultants GL Hearn

2. Introduction

- 2.1 This is the third meeting of the Development Plan Working Group in 2016. This report provides a brief overview of items to be tabled at the meeting and asks for Members to note the publication of consultation and technical documents.

3. Issues for Discussion

The Project Plan (Appendix 1)

- 3.1 At the 15 July meeting of the Development Plan Working Group Members asked for:
 - A more detailed Gantt chart including key committee dates.
 - A risk assessment to help keep Local Plan on track and identify any risks which might impact this. To be reviewed monthly.
 - Key meeting dates in a timetable.
- 3.2 We have produced a Project Plan for production of the Local Plan. It is divided into a Task Plan (covering timetable), a Costs and Procurement Plan (covering expenditure), a Communications Plan (to guide consultation) and a Risk Management Plan (to help make sure the project runs to timetable).
- 3.3 Paragraph 3.6 of the Project Plan includes a list of milestone dates indicating when we are expected to take items to members, as was requested at the last meeting. A more detailed Excel spreadsheet is also being distributed to Members which shows tasks against meeting dates.

4. Consultation on the First Steps Documents (Appendices 2,3 and 4)

- 4.1 Members are requested to comment on and note the release of the 'First Steps' documents for consultation. The main document is in two parts. Part 1 includes ten questions particularly aimed at Parish and Town Councils and residents. Part 2 contains twenty questions around what we think the main issues for the new Local

Plan will be. These issues are around the areas which we think will generate the most debate as we progress the plan, and the areas where we have the most choice on how to change policy.

4.2 An Open Space questionnaire will also be sent out asking for local communities to nominate areas of 'Local Green Space' for inclusion in the Local Plan, as will a 'Development Opportunities form'. The latter is to help identify potential sites and support production of a 'Strategic Housing and Employment Land Availability Assessment', commonly known as a SHELA. The SHELA will be a list of housing and employment sites with an assessment of whether they are suitable, available and viable for development. It will also include a list of discounted sites which are considered unsuitable for development. The accompanying practice guidance for the National Planning Policy Framework (NPPF) makes clear that (Section ID3, paragraphs 009-13):

- *"Plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable,"*
- The expectation is that *"the assessment should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land"*, and that
- *"Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness".*

4.3 Finally a Sustainability Appraisal Scoping Report will be made available for comment. This report forms the first formal stage in our sustainability appraisal. The appraisal is a legal requirement and is used to evaluate options for policies and sites against a range of economic, social and environmental criteria. We are required to consult with Natural England, Historic England and the Environment Agency on its contents (this scoping stage) under the 2004 Environmental Assessment of Plans Regulations. The scoping report reviews other relevant policies, plans, programmes that may influence our plan, looks at what we know about the National Park to establish 'baseline information' on how things are at the moment and sets out the objectives we will be using to carry out the sustainability appraisal. As this is a long technical report it is not appended, but is available to Members on request.

5. The Settlement Hierarchy Paper (Appendix 5)

5.1 We have circulated a draft of a settlement hierarchy topic paper for discussion. This will eventually be published for comment and will form part of the supporting information to the plan. It incorporates material from and expands upon question 3 in the 'Five Questions' document previously tabled. The paper is intended to aid discussion on the 'direction of travel' when it comes to settlement hierarchy and no decisions are required at present. The outcome of any landscape character assessment work and the call for housing sites may also possible influence the eventually hierarchy, and until these outcomes are known we are not in a position to finalise the policy.

6. Publication of the Strategic Housing Market Assessment (Appendices 6 and 7)

6.1 Members are requested to note the publication of the final Strategic Housing Market Assessment report, which has been prepared by consultants GL Hearn (Appendix 7). Some information from the report has already been presented to Members as part of the discussion on housing need under question 1 of the 'Five Questions' paper. A short report setting out the background to the SHMA and a summary is at Appendix 6.

7. Financial and Staffing Implications

7.1 None at present.

8. Contribution to National Park Management Plan

8.1 An up to date Local Plan supports a number of the priorities set out in the Management Plan and sets a framework for ensuring that the objectives can be delivered.

9. Legal Implications

9.1 None at present

10. Recommendation

10.1 That: Members note and comment on the content of the reports and endorse the publication of the Strategic Housing Market Assessment

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Local Plan - Project Plan

1. Introduction

- 1.1 This document sets out a detailed project plan for the North York Moors National Park Local Plan. This follows the 15 July meeting of the Development Plan Working Group. Members asked for:
- A more detailed Gantt chart including meeting dates.
 - A Risk assessment to help keep Local Plan on track and identify any risks which might impact this. To be reviewed monthly.
 - Key meeting dates in timetable.
- 1.2 It is divided into a **Task Plan** (covering timetable), a **Costs and Procurement Plan** (covering expenditure), a **Communications Plan** (to guide consultation) and a **Risk Management Plan** (to help make sure the project runs to timetable).

2. Scope of the project.

- 2.1 This project plan covers production of the North York Moors National Park Local Plan, which will run from 2016 to 2035. The project began in March 2016 will take around three years to the end of 2018. Management of the project rests with the Policy Team at the North York Moors National Park Authority, under the direction of the Director of Planning. The project is divided into a research and plan formulation phase (including the buying in of external expertise), a public consultation phase and finally independent testing at Examination in Public before final completion.

3. The Task Plan

Current published timetable

- 3.1 Our current published timetable is set out in the Local Development Scheme which was approved for publication by the National Park Authority in March 2016. This timetable is at Appendix 1.
- 3.2 This timetable indicates a publication date (where we ask for views on what we consider to be our final plan) of October 2nd 2017, submission of the plan to Government on January 8th 2018 and final adoption in November 2018. The timetable was initially based on the 'rule of thumb' that production of a plan should take around three years from start to finish.
- 3.3 Given that we cannot be absolutely certain that delays will not happen (and because of experience elsewhere) there is an element of contingency built into the current adopted timetable. It currently indicates a ten month gap between submission and adoption. Previous procedural guidance on Local Plans issued by the Planning Inspectorate (PINS, December 2013) indicated that assuming the plan was sound at submission and no changes were needed a six month submission, examination and report timeframe may be

possible. The Gantt chart at Appendix 2 indicates a ‘minimum’ timetable if a six month examination timetable is achieved. This guidance has since been updated (June 2016) to remove the timetable on the basis that PINS experience so far has been that Authorities have required major modifications post submission which have required further consultation and this has led to timetable uncertainties. If we can be confident of submitting a fully sound plan the additional seven months contingency could be brought forward to earlier in the preparation process to fully make sure the plan is sound at submission.

- 3.4 Please note the timetable does also not easily divide into discrete ‘chunks’ – the Gantt chart shows sequential steps whereas in reality work on some stages will start earlier than indicated and overlap with others – so for example work on scoping out the Issues and Options document will start during consultation on the First Steps document. Work on documents will in reality take longer than the time indicated on the Gantt chart.

External pressures

- 3.5 The Government has indicated that it may be mindful to intervene in plan-making should local planning authorities be making slow progress in bringing forward plans. No details have yet been given on what deadline may apply, or how Government may prioritise authorities for intervention. However, a recent report to Government by the Local Plan Expert Group recommended that for Authorities with a plan in place but no plan adopted since the National Planning Policy Framework was published in 2012 (as in the North York Moors) a deadline of March 2018 for the submission of a plan to Government could apply. We are currently estimating a submission date of January 2018.

Milestone dates

Milestone	Date
Clearance of ‘First Steps’ document by DPWG	19 August 2016
Consultation on ‘First Steps’ document	29 August – 21 October 2016
Clearance of the ‘Issues and Options’ document by DPWG	20 January 2017
Agreement of the ‘Issues and Options’ document	30 January – 24 March 2017
Agreement of ‘Preferred Options’ document by Planning Committee	18 May 2017
Consultation on ‘Preferred Options’ document	27 May – 30 June 2017
Agreement of ‘Pre-Submission’ (Regulation 19) document by Planning Committee	21 September 2017
Final consultation on Pre-Submission’ document	2 October – 24 November 2017
Submission to the Secretary of State	4 January 2018
Hearings start	12 March 2018
Inspector’s Report Received	18 June 2018 (no slippage), 22 October (with contingency)
Plan adopted	9 July 2018 (no slippage), 5 November (with contingency)

4. The Costs and Procurement Plan (Summary)

- 4.1 We are currently anticipating the following expenditure for the whole plan process in (excluding) staff costs:

2016/17	2017/18	2018/19	2019/20	Total
£64,100	£60,400	£138,200	£8,900	£271,600

- 4.2 Staff costs (including pension costs and travel and subsistence) are estimated at £89,000 per year for all policy work. It is likely that around 70% of this spending will support local plan work.
- 4.3 Expenditure for the current year (2016/17) is already committed. Expenditure over the next Business Plan period 2017-20 is estimated at £207,500. This is subject to discussion and will be included in the draft MTFS as part of the B Plan process. A more detailed breakdown is available on request.

Breakdown

- 4.4 The biggest element of the external costs is the local plan examination, which cannot be avoided or reduced, except to make sure the plan is sound on submission to avoid delay at examination. The figure of £138,000 for 2018/19 is made up of twenty weeks of Inspector's time at £993 per day (including preparation and report writing) and a Programme Officer salary estimated at 6-8 months of £20,000.
- 4.5 The next largest items of expenditure cover commissioning external consultants to do specialist studies. We anticipate that these will be as follows:

Study	Indicative cost
Employment Land Review	£10,000
Economic Viability Study	£15,000
Landscape character & sensitivity	£30,000
Strategic Flood Risk Assessment	£10,000

- 4.6 These costings are highly indicative and work may be carried out in house. This is in addition to costs for the Strategic Housing Market Assessment which has already been completed. The remainder of the proposed expenditure is largely made up of one day a week of external officer time and design, printing and distribution costs.

5. The Communications Plan

- 5.1 Effective and widespread consultation will be vital to the success of the Local Plan. We are currently consulting widely as part of our Resident's Survey. An initial Communications Plan to ensure this happens is set out at Appendix 3. The Communications Plan will be updated as the Local Plan progresses.

6. The Risk Management Plan

- 6.1 Appendix 4 contains a risk register for preparation of the Local Plan. This sets out anticipated risks, their possible magnitude and a strategy for their avoidance or mitigation.

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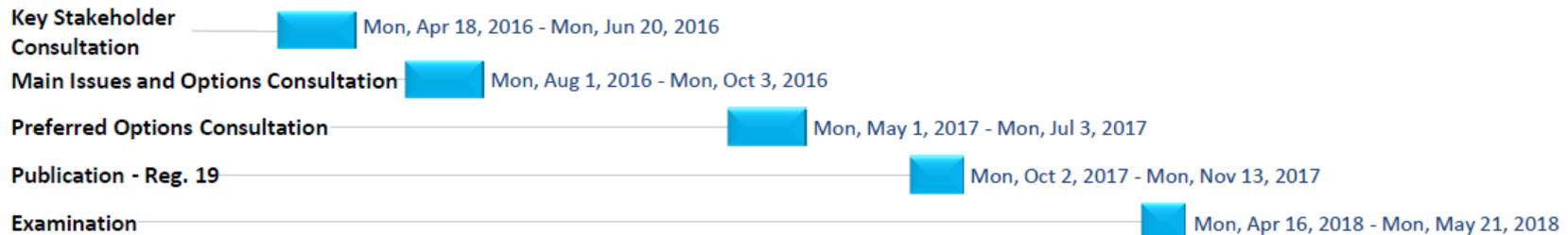
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Appendix 1 - Current published timetable

North York Moors Local Plan - Timetable



We need your views:



Appendix 3 – Draft Communications Plan

This Communications Plan will be continuously updated to respond to demand and changing requirements.

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
FIRST STEPS DOCUMENT				
21 August 2016	Commission covers and consistent branding	Commission standard covers for the Local Plan, Business Plan and update to the Management Plan which can be reused.	PF/GS	£500?
21 August 2016	Prepare maps	To distribute to Parishes	ACS/SK	n/a - Internal
21 August 2016	Prepare poster and send to Parish Councils/distribute	Based on poster	ACS	n/a - Internal
21 August 2016	Put up posters on noticeboards	<ul style="list-style-type: none"> - Staff to deliver/put up when out on site visits and meetings around district and in home area - Details of forthcoming consultation events to appear on posters - Posters on noticeboards, shops, supermarkets, libraries, tourist information. 	Planning Policy/DM team/all staff	Staff costs
21 August 2016	Send out document	<p>Check against statutory consultees list. Review against Equalities responsibilities.</p> <p>Create Survey Monkey questionnaires</p> <p>Assume ten hard copies needed (libraries/HQ/visitor's centre)</p>	ACS/PF	n/a - Internal

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
21 August 2016	Press release		CF/PF/AH	n/a - Internal
21 August 2016	Suggested text For Parish newsletters	Short article with link to website	PF	
21 August 2016	Moors Messenger Article	Draft article	PF	n/a - Internal
21 August 2016	Twitter/Facebook release		CF/PF/AH	n/a - Internal
31 August	Presentation at joint Parish Forum		PF	n/a - Internal
TBC	Attend Parish Council Meetings on request	For those who express interest e.g. looking at potential development. Attend Helmsley Town Council	PF/ACS	n/a - Internal
ISSUES AND OPTIONS DOCUMENT				
	As above, with the addition of:	-		
Jan 2017	Preparation for drop-in events	<ul style="list-style-type: none"> - Contact parish/town councils - Ask for suggestions on suitable venues for drop-in events - Enquire whether any other events taking place over the consultation period - Enquire about mini displays 	PF/ACS	Staff costs only

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
Jan 2017	Produce media plan	<ul style="list-style-type: none"> - Setting out expected press activity over the period of the consultation, scheduling in press briefings, press releases - Prepare text for social media – Facebook, Twitter. 	CF/PF/AH	Staff costs only
Jan 2017	Commission drop in materials	<ul style="list-style-type: none"> - To include: graphic/branding, pop-up banners, tabards for outdoor events, Foamex information boards 	PF/ACS	Staff costs Design/printing costs (£1500?)
Jan 2017	Parish newsletters - Short article with link to website	<ul style="list-style-type: none"> - General details/teaser to inform about forthcoming consultation - Link to web page for more information - Give dates of events if confirmed 	PF/ACS	Staff costs
Jan 2017	'Out and About' & Moors Messenger magazine - Short article with link to website	<ul style="list-style-type: none"> - General details/teaser to inform about forthcoming consultation - Link to web page for more information - Give dates of events if confirmed - Use visuals/photos/branding 	PF/AH	?????
Jan 2017	Produce rolling PowerPoint presentation	<ul style="list-style-type: none"> - To be shown/available at events, possibly including Member briefing on 18 June and press briefing on 23 June (could be shown just on arrival so as not to cause a distraction during discussions) 	PF	Staff costs
Jan 2017	Member briefing		PF	Staff costs
Jan 2017	Web page	<ul style="list-style-type: none"> - Include web link on all documents and materials produced - All relevant materials made available on web page as and when produced 		Staff costs

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
Jan 2017	Briefing	- Briefing for NYMNP Staff	PF	Staff costs
Jan 2017	Briefing	- Note for intranet with contact details	PF	Staff costs
Jan 2017	Parish Forums	- PowerPoint presentation	PF	Staff costs
Jan 2017	Leaflets	- Prepare and print consultation leaflet - internal A4 folded to A5.	Planning Policy	Staff costs
Jan 2017	Printing of consultation documents	- Depending on size whether internal or external. Need hard copies for 6 libraries, The Old Vicarage, and two visitor centres.	PF/ACS	Printing costs - £750??
Jan 2017	Start of consultation	- 12 week consultation period commences - Announce on website/Twitter/Facebook/press release		Staff costs
Jan 2017	Mail out consultation documents	- Mail out to parishes, Members, statutory consultees, libraries, secondary schools. - Make offer to parishes in covering letter to attend their meetings - Make documents available at NYMNP receptions, libraries.	ACS	Staff costs
Jan 2017	Establish/run consultation Portal	- Online response system. Initially assuming IT will build an Access database but may need a bespoke solution	PF	£1500?
Jan 2017	Shows and Festivals	- Stall with maps, leaflets and documents available and staff to answer questions - Hand out leaflets/provide information - Staff to wear NYMNP clothing/badges	PF/ACS	

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
Jan 2017	Drop-in events	<ul style="list-style-type: none"> - In some villages (locations to be determined once housing sites known) - Rolling (silent) presentation to be projected - Pop up/display boards - Write up and publish main points received. 	PF/ACS	Staff costs
Jan 2017	Visitors Material	<ul style="list-style-type: none"> - Prepare displays and distribute displays and leaflets to visitor's centres and mobile display units. 		
Jan 2017	Stall at agricultural shows, farmers markets, summer fetes (dependent on time of year)	<ul style="list-style-type: none"> - Dependent on locations to be determined 	PF/ACS	Staff costs
Jan 2017	Consult with Minority/Gypsy and Traveller communities	?	PF/ACS	Staff costs
Jan 2017	Other groups' meetings / events	<ul style="list-style-type: none"> - Send leaflets, posters to other groups' events / meetings / activity as appropriate e.g. young people activities; village hall committee meetings; WI groups etc. 	PF/ACS	Staff costs
PREFERRED OPTIONS DOCUMENT				
	As above, with the addition of:	-		
May 2017		<ul style="list-style-type: none"> - 500 x 8 page A5/B5 leaflet, printed externally 	PF/ACS	£500
PRE-SUBMISSION DOCUMENT				

Timing/ deadline	Activity	Details	Responsibility	Indicative Budget
	As above, but confirmed to production and distribution of documents plus press/media, plus:	-		
October 2017	Response form	- Produced standard response form based on the PINS model.	PF/ACS	Staff costs
SUBMISSION DOCUMENT				
January 2018	Submit documents	<ul style="list-style-type: none"> - Produce examination library list - Order/source bankers boxes - Print documents x 2 - Arrange courier 	PF/ACS	£200

Appendix 4 - Risk Management Plan

The following plan considers potential risks to timetable and mitigation and avoidance measures. It will be regularly reviewed.

The Risk	Impact What would be the impact if the risk happened?	Probability How likely is it that the risk will happen?	Explanation Why has this been identified as a risk?	Action Required What will you need to do to put controls in place or to enhance existing controls and by when?	Lead Responsibility Who is responsible for managing the risk?
Staffing and resources					
Sickness, absence or moving on of key policy staff.	High	Low	Current staff resources are 1.8 FTE with a further 0.2 FTE time being bought in at present, to cover all policy work, meaning any staff changes would risk considerable slippage	Urgent recruitment of replacements following agreement from Members. Diversion of resources from elsewhere (Development Management) if possible Buy in additional consultancy assistance	CF
Slippage due to key staff taking holiday/leaving holiday entitlement to the end of the year	High	Medium	Leave year rules mean that officers must use up leave by 31 March. At present by August neither officer will have taken any leave.	Managers to make sure leave is taken earlier or agree to carry over.	CF/PF
Other work priorities divert resource from the Policy team	High	High	The team also has to cover, principally: <ul style="list-style-type: none"> • Minerals and Waste Plan • Review of the Management Plan • Policy consultations from Development Management 	Policy team to highlight if there is likely to be a coalescence of workload peaks. Particular areas of concern: <ul style="list-style-type: none"> - Public examination on the Minerals and Waste Plan (c June 2017 and Preferred Options Stage for the 	PF/ACS

			<ul style="list-style-type: none"> • Undergrounding of overhead lines work • General queries and correspondence <p>One policy officer (of two) is current able to devote around 40% of time to the Local Plan</p>	<p>Local Plan.</p> <ul style="list-style-type: none"> - Revisions to the Management Plan (November 2016) and preparation of Issues and Options document 	
Plan - Making					
Insufficient supporting evidence to support plan, making the plan unsound	High	Medium	It is common at the moment for plan examinations to be adjourned whilst further work is undertaken - which requires additional consultation	<p>Review the NPPF and PAS guidance to create list of required evidence.</p> <p>Share with other National Parks to encourage joint working/gauge costs and time taken</p> <p>Make sure <u>all</u> elements of the plan are supported by up to date evidence including sustainability appraisal even if current policy</p> <p>Investigate whether the Planning Inspectorate will carry out an advisory visit/pre-examination check</p> <p>Attend/ keep track of examinations elsewhere, particularly National Parks</p> <p>Consider some limited slippage of submission milestone if it avoids longer disruption of the examination timetable</p>	Planning Policy Team
Failure to demonstrate the 'duty to co-operate'	Low	High	A statutory requirement of plan making – we must demonstrate	Ensure Duty is met through regular liaison	Planning Policy Team

			we have worked with neighbouring authorities and national agencies	<p>Review consultee list to make sure DtC bodies are consulted.</p> <p>Prepare a standard template with other authorities for consistency</p> <p>Prepare a statement of common ground with other authorities for examination</p>	
General slippage	High	High	It is common for local plan timetables to slip	<p>Development Plan Working Group to review progress against the project plan.</p> <p>Early flagging up of potential slippage</p> <p>Investigate possibility that some additional work could be sent out to consultants</p>	Planning Policy Team
Far more potential development sites submitted than expected, time taken to assess sites through Land Availability Assessment (LAA) and Sustainability Assessment (SA)	Medium	High	Assessment of sites and sustainability appraisal is one of the most time consuming parts of plan preparation.	<p>Combine/align the LAA and SA processes as closely as possible</p> <p>Make sure all information collected is needed /fit for purpose</p> <p>Avoid over complication, keep simple yet robust.</p>	Planning Policy Team
Lack of detail on availability and deliverability of sites	High	High	The plan and supporting evidence must indicate a five year supply of deliverable housing land. Deliverable means a realistic prospect of completion in the next five years, for which land owner intentions need to be known.	<p>Solicit sufficient information through the development opportunities questionnaire.</p> <p>Follow up land owner intentions prior to examination</p>	Planning Policy Team
Difficulties in following policy/imprecise policy	Low	Medium	Confusion would weaken the usefulness of consultation	Produce policy wording as earlier as possible and for as early a consultation	Planning Policy Team

wording			responses and would undermine the implementation of the plan.	<p>stage as possible</p> <p>‘Road test’ policies with the DM team – specific round table events or at team meetings</p> <p>Consider policy wording against past examples of applications.</p>	
Documents are presented in a drab or inconsistent format or without consistent branding, or are not simply written or presented.	Low	Low		<p>Use the NYMNP clear communications guide</p> <p>Avoid jargon and acronyms</p> <p>Documents to be as short and concise as possible</p> <p>Make the plan as ‘park-specific’ as possible and highlight/write around special qualities.</p> <p>Avoid writing for a technical audience – ask for feedback from non-policy colleagues</p> <p>Commission consistently branded covers/logos</p> <p>Include a glossary in the plan</p>	
Process					
Insufficient resources to produce, collate and distribute documents at key consultation stages.	Low	Low		<p>Consult by email where possible/unless post requested</p> <p>Investigate possibility of using a mailing company if email can’t be relied upon.</p>	

Internal printing capacity	Medium	Medium	Not enough capacity/time to print and collate documents when up against deadlines	Carry out an estimate of numbers of pages that need printing. Involve corporate services if needed. Make sure we have sufficient printer toner/paper	
Consultation					
Stakeholders unable to respond within deadlines.	Low	Medium	Regulation 17 of the Local Plan Regulations states that a minimum of six weeks is required for consultation on the formal Regulation 18 (pre-publication) and Regulation 19 (publication) stages. In practice this can prove difficult, specifically for any public body agreeing responses through a committee cycle.	Produce and follow a Project Plan, allowing for adequate time for all activities Assume a week consultation period offered with possibility that late responses could be accepted at earlier stages if agreed beforehand.	Planning Policy
Failure of stakeholders to engage due to format of documents	Low	Medium	Failure could be due to confusion as a result of complexity of presentation and/or insufficient information or insufficient channels for consultation	Make sure the Communication plan has ownership and is updated/used. Ensure strategy guidance is followed and plain English used 'Test' consultation materials on colleagues Allow respondents to skip questions if they wish	Planning Policy Communications Officer
Failure of stakeholders to engage due to loss of confidence in process resulting from details of consultation being factually	Low	Medium	Existing documentation – Local Plan, committee reports etc.	Check/proof read all materials for accuracy before finalising	Planning Policy

incorrect					
Insufficient responses to all questions raised	Low	Low		Ensure all issues are addressed in consultation materials and channels and present them in order of priority	Planning Policy
Queries not dealt with in time or efficiently or officers not adequately equipped/informed to explain issues to stakeholders.	Medium	Medium		Regular management of local plan inbox, setting up a separate email inbox for the local plan if needed. Brief colleagues on key aspects of the plan.	Planning Policy
Consultation is not linked to other Authority priorities	Medium	Medium		Make sure the Local Plan and preceding documents and any summaries contain clear links and common objectives	Planning Policy, Communications team
Adverse press coverage – locally/nationally	Low	Low	This is highly unlikely	Make sure that the plan adequately explains the background and context and stresses the statutory duties on protecting the National Park the Authority is required to operate Monitor coverage – follow up with letters/press releases if necessary.	Chris/Paul/Alison
Disproportionate responses from vocal stakeholders or to particular issues	Low	Low	Plans can receive lots of responses to particular issues or 'campaigns' can generate lots of standardised responses.	Placing of responses in context in consultation summaries, adequate consultation across all sectors/demographic profiles	Planning Policy team

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