

Proposed SDNPA comments on the Twyford Pre-submission Neighbourhood Plan

Reference	Comment	SDNPA Recommendation
General comments	<p>The Parish Council is to be congratulated on having prepared a robust and locally distinctive plan for their community. In particular the South Downs National Park Authority (SDNPA) would commend the hard work and effort put into preparing a plan in a particularly sensitive environment, having to take into consideration the impact on internationally designated sites, and balancing this with the community’s aspirations for development to meet locally identified need.</p> <p>The SDNPA also recognise the approach the TPC has taken to allocating site for housing development, identifying a site which will offer a range of community benefits although the site will require careful consideration in its development.</p> <p>The following table sets out the comments made by SDNPA. Many of these comments and proposed amendments are required to ensure the TNP meets the Basic Conditions.</p>	
General Comments	<p>A number of the TNP policies refer to policies within the South Downs Local Plan (SDLP), for example many TNP policies include policy requirements to comply with a specific policy of the SDLP. If the TNP successfully passes Examination and Referendum it will form part of the Development Plan, therefore there it is not necessary to make reference to SDLP policies. National Planning Practice Guidance requires NDPs to prepare policies which are clearly written, concise and precise serving a clear purpose and avoiding unnecessary duplication of policy. It is recommended that all reference to SDLP policies is removed from TNP policy. Policy reference could be included within the supporting text of each relevant policy if necessary</p>	<p>Remove references to SDLP policy from TNP policies. If necessary and appropriate SDLPA policy reference could be included within the supporting text of each TNP policy.</p>

<p>General Comments</p>	<p>There are several references to the emerging SDLP, and references to when the SDLP is adopted. The SDLPA has been adopted (July 2019) so these references should be updated to reflect that</p>	<p>Update references to the SDLP to reflect its adopted status</p>
<p>Front Cover</p>	<p>The front cover of the Twyford Neighbourhood Plan (TNP) should state the plan period to which the plan applies. The vision statement refers to a date of 2036, SDNPA would recommend the plan period aligning with the SDLP plan period which runs to 2033</p>	<p>Include plan period on front cover, and make reference to the plan period in the vision and objectives section of the TNP</p>
<p>Policy SB1. Second Paragraph</p>	<p>Reference should be to the development plan rather than other policies in this plan, as policies of the SDLP will also be relevant in relation to development outside the Settlement Boundary</p>	<p>2. Within the area of the TNP but outside the settlement boundary, development will not normally be permitted except as specified by other policies of the <u>is Development Plan</u>.</p>
<p>Policy SB2</p>	<p>To provide clarity it is suggested that modifications should be made to Policy SB2 to make it clear that development outside the settlement boundary will be in exceptional circumstances as per the following policies in the TNP</p> <p>The references to policy titles should match that of the policies</p> <p>As the TNP will form part of the development plan, which will include the SDLP, there is no need to refer to the policies of the SDLP, as applicants will be expected to demonstrate how they comply with all relevant policies of the Development Plan. The introduction to the TNP makes clear that the policies of the SDLP will also apply in Twyford, so repetition of these policies is not necessary.</p>	<p>1. Development outside the settlement boundary will <u>only</u> be permitted <u>in exceptional circumstances as per subject to the following policies of the TNP as set out in detail as follows:</u></p> <p>Housing: HN3: Housing Allocation HN5: <u>Rural Exception Sites Affordable Housing Exception Sites</u> HN7: <u>Housing in the Countryside Other housing</u> HN8: Orchard Close (<u>Retirement</u>)</p> <p>Business and Employment: BE1: Employment and Business provision BE2: Northfields Farm & Hazeley Enterprise Park BE3: Twyford Preparatory School</p> <p>Tourism: ST1: <u>Visitor Attractions and Tourism Facilities Sustainable Tourism</u></p> <p>2. For other types of development outside the settlement boundary, the policies of the SDLP will apply.</p>

Agenda Item 11 Report PC19/20-43 Appendix 2

<p>Policy HN1</p>	<p>There is no need to refer to the minimum space standards, as an applicant would be expected to meet these standards, without reference in Planning Policy. Space standards apply without reference in the Development Plan</p> <p>Part 3 of the policy requires maximum floor areas for new housing. It would be helpful if the supporting evidence provided more explanation of the rationale for this, other than reference to the SDLP and Winchester Local Plan. There would also need to be evidence to support such a requirement in Twyford</p>	<p>2. The minimum dimensions of new housing shall accord with nationally described space standards.</p> <p>Provide additional evidence to justify the policy requirement for maximum floor areas for new housing</p>
<p>Policy HN2</p>	<p>This policy does not add anything in addition to policies SB1, SB2 and HN3. Neighbourhood Development Plans are required to prepare concise and precise policies, therefore it is recommended that this policy is deleted</p>	<p>Policy HN2 – Housing provision</p> <p>Provision will be made for additional housing by the allocation of additional land for 20 dwellings and by infilling and redevelopment within the settlement boundary and by other policies of this Plan.</p>
<p>Map 3</p>	<p>To ensure the decision maker can apply the policies of the TNP consistently and with confidence when determining planning applications it is recommended that Map 3 only shows the allocated site. Other sites which have been considered and discounted could be provided in supporting evidence to demonstrate a sequential approach to allocating the preferred development site, this information is not appropriate for the development plan</p>	<p>Amend map 3 to show only the allocated site for housing development, the Settlement Policy Boundary and any other relevant allocations policies including HN8 and DB2</p>
<p>Policy HN4</p>	<p>As currently worded this policy requires 50% affordable housing on all housing development. The SDLP requires 50% affordable housing on sites with a gross capacity to provide 11 dwellings or more. This policy would need to be modified to be in general conformity with a strategic policy of the development plan. As the policy is duplicating policy in the Development Plan (SD28) it is recommended that part 1 of the policy is deleted</p>	<p>1. Provision for affordable housing will be made at 50% in accordance with SDLP SD 28.</p> <p>2. The occupation of affordable housing will be limited to people with strong local connections to Twyford Parish. The eligibility criteria are those agreed for the most recent scheme at Hewlett Close. Priority is to be given to those born and educated in the Parish and</p>

	<p>Part 2 of the policy seeks to restrict the occupation of affordable housing to those with a strong local connection to Twyford. The SDLP includes a cascade policy in relation to affordable housing in SD28 part 4, this is further explained in paragraph 7.61. The SDLP approach prioritises those living within the settlement, followed by those in the Parish before cascading out to settlements and parishes in neighbouring parishes in the SDNP. This approach has been tested rigorously at Local Plan examination and it is therefore recommended that the occupation of affordable housing be determined by the policy within the SDLP and this policy is deleted.</p>	<p>those who have been resident in the Parish for a long time and have close relatives in the Parish.</p>
<p>Policy HN5</p>	<p>Part 1 of Policy HN5 does not provide any additional policy criteria to that proposed in the SDLP Policy SD29, therefore this would just be repetition of existing development plan policy, it is recommended that this part of the policy is deleted.</p> <p>As per previous comments, the occupation of Affordable Housing will be determined using the cascade policy as set out in SD28 of the SDLP. It is likely that this element of the policy would be removed through examination, it is therefore recommended that this policy is deleted.</p>	<ol style="list-style-type: none"> 1. Proposals for new residential development of 100% affordable housing will be permitted outside the settlement boundary in accordance with SDLP SD29. 2. The occupation of affordable homes will be as set out in HN4 (2).
<p>Policy HN6</p>	<p>Part 1 of the policy refers to the following 'new housing, being permitted. However, the subsequent policy criteria include modification to existing housing, therefore the reference to 'new' should be removed</p> <p>Criteria a of the policy refers to Policy SD31, which deals with extensions both inside and outside the settlement boundary. As Policy HN6 is concerned with only proposals within the settlement boundary, this aspect of the policy will need to be addressed. How will applications for extensions outside the</p>	<p>The following policy requires significant modification as per the comments provided. The SDNPA have not attempted to provide modified text as there are a number of interlinked comments to consider. SDNPA officers will be able to support TPC in providing appropriate modification to the policy if required.</p> <ol style="list-style-type: none"> 1. Within the settlement boundary, (shown on Map) the following new housing types of development will be permitted:-

	<p>Settlement Policy Boundary be considered, will the TNP rely on the approach adopted in the SDLP?</p> <p>Policy Criteria d refers to proposals within the settlement boundary, however, Policy SD30 applies to replacements dwellings outside settlement policy boundaries, therefore this aspect of the policy needs to be addressed as it does not comply with SDLP Policy</p> <p>Policy criteria e, f and g would suggest that redevelopment, infill and development on plots can occur on plots which are greater than 0.1 hectare or less than 0.1 hectare. As currently worded the policy is confusing. The further explanation provided in the policy does not provide the necessary clarification to allow the decision maker to make consistent decisions with precision, therefore it is recommended that this policy is reviewed to ensure the intentions are met and provide decision makers with clear policy guidance.</p> <p>Part 2 a of the policy requires new dwellings to not exceed 170 Meters Square, however this is not consistent with the approach set out in policy HNI, it is recommended that this aspect of the policy is reviewed to ensure consistency with other TNP policy</p> <p>Part 2 b of the policy would be more appropriate if presented as supporting text. Further explanation and consideration is required in relation to the requirement to not comply with the 30% limit as applied by policy SD30 of the SDLP</p> <p>Part 2 c of the policy as currently drafted would be open to interpretation and does not provide clarity for the decision maker. Areas which are predominantly detached housing is not a precise statement and therefore could not be applied</p>	<ul style="list-style-type: none"> a) Extensions (as provided for in SDLP policy SD31). b) Changes of use of buildings (other than those which are subject to BEI and CPI). c) Subdivision of single dwellings. d) One for one replacement (as provided for in SDLP policy SD30) e) Redevelopment of dwelling plots less than 0.1 ha f) Single plot infill on plots less than 0.1 ha g) Development on plots in excess of 0.1 ha. <p>2. Development is subject to the following restrictions:</p> <ul style="list-style-type: none"> a) For categories e, f & g sites, no dwelling to exceed 170 msq GIA. b) Category e is intended to allow for the redevelopment of single house plots with two or more smaller dwellings; to secure this objective, the 30% limit of SDLP policy SD30 is not applied. c) In areas where detached houses are predominant, only single plot infill will be permitted. d) flood risk to comply with WEI. 1 and 2.
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	<p>consistently. It is recommend this aspect of the policy is redrafted to provide a clearer approach</p> <p>Part 2 d of the policy is not necessary as applications will be required to conform with all policies in the TNP, therefore these policies will be applied without reference in this policy</p> <p>Part 3 of the policy could be presented as a separate policy relating to development in conservation areas.</p> <p>The further explanation part of this policy would be more appropriate as supporting text. This will require further consideration given the comments provided above</p>	<p>3. Within the Twyford Conservation Area (shown on Map 4), and subject to SD 15 (Conservation Areas), new dwellings will be permitted by change of use or conversion or new build or redevelopment; the loss of garden land will be resisted.</p>
<p>Policy HN7</p>	<p>Part 1a of the policy refers to a minimum provision only being permitted. This requires further explanation to enable decision makers to apply the policy consistently, what is considered minimum provision?</p> <p>Part 1b of the policy refers to the need for a legal agreement, this requirement is likely to significantly delay the process of application. The use of planning conditions would be appropriate and this part of the policy should be deleted. Supporting text could provide further clarification in relation to this aspect of the policy</p> <p>Part 1c of the policy appears to prioritise two particular types of institution, yet part 1a of the policy refers to all institutions in the countryside. It is not clear why these particular institutions are referred to in the policy, it is recommended that this aspect of the policy is removed.</p> <p>Part 1di is not precise as to how the proposal could demonstrate its benefit to the special qualities of the National Park or to the community of Twyford. It is suggested that this policy criteria is replaces with a separate criteria relating to design, or landscape</p>	<p>1. Planning consent for new dwellings in the countryside will be permitted in the following cases subject to the demonstration of need in each case:</p> <ul style="list-style-type: none"> a) Accommodation for resident staff of existing institutions in the countryside: the use will be tied to the institution; minimum provision only will be permitted. b) Annexes for close family members (relatives) provided a legal agreement is entered into to tie any consent to the existing property and to prevent subsequent subdivision and sale away from the main house. The extension is not to exceed 60 sq. m. Temporary accommodation may also be permitted. c) At racing stables, hostel accommodation tied to the operation. d) Subdivision of large houses will be permitted where : <ul style="list-style-type: none"> i) marketing has demonstrated lack of demand for use as a single house and that the proposal is to the

	<p>setting, rather than seeking the subdivision of a home to contribute to the special qualities of the SDNP Part I d ii is not appropriate as this would not be possible should the existing dwelling be converted to two semi-detached dwellings. It is anticipated that new occupants would want to have entire control over the management of their property. This policy clause is assuming the subdivision would result in the creation of flats, which may not be relevant. Part I diii of the policy is assumes that it would not be appropriate to introduce boundaries following the subdivision of a large house. However, boundary treatments may be appropriate depending on the nature of the sub division, therefore this part of the policy should be removed.</p>	<p>benefit of the special qualities of the SDNP and to the community of Twyford. ii) subsequent management will be for the property as a whole. iii) No new boundaries are created.</p> <p>2. Other housing development will also be permitted as set out in SDLP policies SD 30, 31 and 32.</p>
<p>Policy HN8</p>	<p>The intention of is to be welcomed given the support for increased provision of elderly care as set out in the SDLP. However, policy criteria d requires further explanation and justification, it is not clear how an expansion of the facility would impact unduly on existing medical services. Indeed expansion of the facility should offer opportunities to improve the existing medical services. It may be appropriate to remove this policy criteria</p>	<p>The expansion of Orchard Close to provide additional facilities for the elderly will be permitted provided:</p> <p>a) It forms part of Orchard Close. b) It is justified by local need. c) Landscape, access and design constraints are properly addressed. d) It does not impact unduly on existing medical services.</p>
<p>Policy BE1</p>	<p>As currently drafted Policy BE 1 offers no further policy requirement than SDLP policies SD34 and SD35. Therefore the policy is unnecessary as it only duplicates SDLP policy. However, this policy does make reference to the redevelopment of Stacey's Garage. The redevelopment of this site is already covered by TNP policy DB2, therefore this aspect of the policy can also be removed. Part 4 of the policy requires there to be no impact on the historic rural roads in the Parish. Part 2 of policy SD35 requires development proposals to not adversely impact the wider landscape, including impacts relating to traffic, noise or pollution. Therefore this element of the policy is not necessary</p>	<p>1. Existing land and buildings in use for economic purposes are to be retained and will be subject to SD 35.2, other than DB2. 2. Within the settlement boundary, development, including change of use and redevelopment for economic purposes will be permitted. 3. Outside the settlement boundary excluding BE2 new development, redevelopment and expansion, whether of site area or buildings will be permitted in accordance with SD 34 and the uses specified in SD 34 (a d and g). In other cases re-development will</p>

		<p>be permitted on a 'like for like' basis. Changes of use for commercial purposes will be permitted provided that no additional heavy traffic is generated.</p> <p>4. In all cases, there should be no additional impact on historic rural roads.</p>
<p>Policy BE2</p>	<p>The SDNPA welcome the designation of the site as a local employment site as per paragraph 7.140 of the SDLP. However the site should not include the area which is currently subject to an extant planning permission as this would not conform to Planning Practice Guidance which states the NDPs should not seek to affect extant planning permission. The site identified on Map 6 should be amended accordingly.</p> <p>Policy BE2.2 as drafted would not comply with the Basic Conditions as it seeks to affect an extant planning permission. Whilst the policy states it appears unlikely that the development will come forward, there is an existing permission in place. Recommend that Policy BE2.2 is deleted, incorporating policy clause b iii into the existing policy BE2.1</p>	<p>The site as shown on Map 6 is designated as a local employment site, subject to SDLP SD 35.4. Consents for expansion or redevelopment or change of use will be granted, within the currently developed area in accordance with Policy BE1 and subject to prior agreement of the following:-</p> <ul style="list-style-type: none"> a) The removal of the feed mill b) The preparation of a master plan to cover the following matters for the whole of site outlined on Map 6 including: <ul style="list-style-type: none"> i) Hours of working ii) Traffic and its routing to minimize the impact on the village and the SDNP iii) Landscaping to minimize the impact on the wider landscape including areas of planting identified on Map 6. iv) Pedestrian and cycle routes. v) <u>The redevelopment of the site should relate well to the existing village facilities</u> <p>As it appears unlikely that the 131 bed care home will now be built and the owners are known to be considering alternatives, the following additional criteria should be met for any new proposal:</p> <ul style="list-style-type: none"> a) Should be in accordance with SD 35: employment land, or b) For any changes of use justified in accordance with SD 35 should:

		<ul style="list-style-type: none"> i) Benefit the community as a whole ii) Provision should be related to the needs and scale of the village iii) Relate well to existing village facilities iv) Have safe means of pedestrian access to facilities v) Not impact on existing medical services vi) Satisfy all the normal landscape and other development requirements vii) Be justified by local need.
<p>Policy BE3</p>	<p>The SDNPA welcome this policy which seeks to address the important role the school plays in the parish and wider area. One minor modification to policy wording is suggested for part 1 of the policy.</p> <p>Part 2 of the policy is not positively worded as required by the National Planning Policy Framework. Aspects of this policy are also covered by other policies within the SDLP and the TNP, therefore it is recommended that part 2 of the policy is deleted.</p> <p>Part 3 of the policy is not clear what part of the site is to be considered the upper parts of the site. If there is an intention to focus development on a particular part of the site this should be shown on Map 7. However, a clear justification for this approach will be required to support such policy requirements. It is recommended that this policy is deleted and reconsidered</p>	<ul style="list-style-type: none"> 1. Further development of the school will be supported subject to the prior preparation of a master plan to incorporate: <ul style="list-style-type: none"> a) Proposals for access and movement which reduces both the use of the car and the current impact of pupil related traffic on the village and local roads b) A landscape and design strategy c) A strategy for the historic fabric and archaeology d) A strategy for the location of additional buildings. 2. Development will not be permitted which would: <ul style="list-style-type: none"> a) Result in an increase in pupil numbers unless it can be shown that there will be no additional traffic, foul sewerage or other environmental or infrastructure impacts. b) Cause harm to the wider landscape or to the relationship of the landscape to the village. 3. Consents for new buildings will be limited to the upper parts of the site.

<p>Policy ST1</p>	<p>The importance of visitor accommodation and tourism facilities is supported by the SDNPA, However, TPC should consider whether this policy is necessary as it essentially duplicates the policy requirements of policy SD23 of the SDLP which adequately covers all aspects of ST1. It is recommended that TPC consider whether this policy is necessary. Policy clauses 3 c and d are not necessary as they refer to SDLP policy and are not appropriate for planning policy (3c)</p>	<ol style="list-style-type: none"> 1. Visitor attractions and tourism facilities will be permitted provided they are: <ol style="list-style-type: none"> a) Directed to the understanding and enjoyment of the special qualities of the National Park. b) Can demonstrate that they will: <ol style="list-style-type: none"> i) Not harm the attraction itself ii) Contribute to the protection and enhancement of the National Park’s special qualities iii) Benefit the local community. c) Assessed for their cumulative effect on the Parish and its infrastructure. 2. Outside the settlement boundary visitor facilities requiring new construction or change of use will only be permitted provided they can demonstrate: <ol style="list-style-type: none"> a) A need for development in that location. b) They will benefit an existing attraction within the Parish and that they will contribute to its preservation. c) They minimize the need for travel by private car and encourage access or subsequent travel by sustainable means, including public transport, walking, cycling and horse riding. 3. In addition to the above, new visitor accommodation will only be permitted where: <ol style="list-style-type: none"> a) The accommodation is for holiday purposes only. b) The accommodation shall not be occupied as a person’s sole or main place of residence or used by any single person
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Policy ST1	<p>This policy is not related directly to land use. Part 1 of the policy seeks to encourage appropriate and sensitive signage to be provided, but it would not be relevant in the determination of a planning application. Part 2 of the policy relates to promoting sustainable visitor behaviour, again this is not relevant planning policy. It is recommended that the policy is deleted.</p>	<p>1. Appropriate and sensitively sited signage, orientation and visitor information (at visitor information points and online) is to be provided for key sites of interest in the Parish, linked to key transport and access routes and compliant with other TNP policies.</p> <p>2. Sustainable visitor behaviour is to be promoted to users of paths and trails using appropriate resources, signage and interpretation at key sites.</p>
Policy CPI	<p>Policy CPI only refers to the relevant SDLP Policy, As per Planning Practice Guidance duplication of policy should be avoided, therefore it is recommended that this policy is deleted. The supporting text for the policy makes clear the importance of protecting important public open spaces. The TPC should consider reviewing the open spaces identified in table 1 to determine whether any would meet the policy tests for Local Green Space designation as this would offer some protection to those important local assets</p>	<p>The policy to be applied is that of SDLP SD 46.</p> <p>Twyford's open spaces are identified in Table 1 and Map 8.</p>
Policy CP2	<p>SDNPA appreciate the intention of this policy to provide clarification as to which facilities in Twyford are to be considered important community facilities in relation to policy SD43 of the SDLP. Whilst this policy essentially sign posts to other policy the clarification on which facilities should be relevant is useful. To assist decision makers it may be appropriate to incorporate the list of facilities in the policy. Robust justification will be required to support the designation of these facilities at examination.</p>	<p>Provide additional evidence to justify the designation of the community facilities listed in Table 2.</p>
Policy CP3	<p>As Twyford St Mary's primary school is identified as a community facility and subject to policy SD43 this would allow for appropriate expansion as per part 1 of SD43. Part 2 of policy CP3</p>	<p>1. Development which is for the maintenance and improvement of the School's facilities for Twyford children will be supported.</p>

Agenda Item 11 Report PC19/20-43 Appendix 2

	is not considered appropriate as it would not be relevant in the determination of a planning application, therefore it is recommended that this policy is deleted.	2. Measures to improve the access to the school will be supported.
Policy LHE3	The identification of areas of archaeological potential should be informed by the Archaeological Notification Area prepared by Hampshire County Council, this will ensure that the policy is evidence led,	Review the Archaeological Notification Area Map for Twyford and consider whether the areas identified in Map 10 require adjustment.
Policy LHE4	The approach taken in Policy LHE4 is supported by SDNPA. The identification of local Green Infrastructure will provide useful local detail to support strategic policy SD45 and provide useful precision for the decision maker. However, the current approach taken by the policy could undermine other important Green Infrastructure assets which exist locally and have not been identified in Policy LHE4. The TPC should consider whether a more general reference is made to Green Infrastructure in the Parish, with the sites currently referenced given as examples of important local green infrastructure. Alternatively the TPC could consider reference to the Hampshire Local Ecological Network, which provides more detail on the Green Infrastructure Network across Hampshire, including Twyford.	Consider a more general reference to Green Infrastructure in the Parish to avoid undervaluing Green Infrastructure which has not been specifically identified in the policy
Policy LHE5	As currently drafted the first 2 points of this policy do not offer anything in addition to the policies of the SDLP. The 3 rd point of the policy is not a relevant planning policy and could not be applied in the determination of a planning application. Therefore it is recommended that this policy is deleted	<ol style="list-style-type: none"> 1. The policies to be applied are those of SD 9, Biodiversity and Geodiversity, and SD 10 International Sites. 2. Trees, Woodland and Hedgerow are protected by SD 11 particularly within the settlement boundary and the Conservation Area. 3. The Parish Council will work with other agencies to improve local biodiversity, encouraging voluntary community participation in the care and maintenance of Twyford Parish's natural environment.
Policy LHE6	As currently drafted this policy does not offer anything in addition to Policy SD8 of the SDLP, therefore it is recommended that the policy is deleted.	The Dark Night Sky status of Twyford Parish is set out in the SD interactive map. SDLP SD 8 will apply.

<p>Policy WE1</p>	<p>The National Planning Policy Framework (NPPF) provides adequate control for development within flood risk areas by application of the sequential test. Part 1 of the policy seeks to apply stricter criteria than that set out in the NPPF, therefore the policy would not meet the Basic Conditions, and it is recommended that this part of the policy is deleted.</p> <p>Part 2 of the policy could refer to a project being pursued by the Parish Council, this could not be used in the determination of a planning application, and should therefore be deleted.</p> <p>Part 3 of the policy does not offer any additional policy detail to that set out in SD49 of the SDLP, therefore this part of the policy should also be deleted.</p> <p>Part 4 of the policy requires development to contribute to mitigation measures, this can only be required if the development will exacerbate the existing situation. As this policy requirements is already set out in SD49 of the SDLP policy WE1 will only duplicate existing policy. Therefore this aspect of the policy should also be deleted.</p>	<ol style="list-style-type: none"> 1. Development will be controlled in accordance with SD 17 & SD 49. New development within Flood Zone 3 will not be supported. 2. The Parish Council is seeking to bring forward a flood mitigation scheme for the area to the east of the B3335 to reduce the impact and extent of flooding in the village centre through flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the village centre and other land east of the B3335. 3. Storm Water Drainage: Risk management development must comply with SD 49. 4. Contributions to drainage improvements: Development should contribute to mitigation of existing sewage and storm drainage problems where it is being connected into existing systems.
<p>Policy WE2</p>	<p>Part 1 of this policy is only signposting to relevant policy which is already part of the development plan, therefore it is not necessary and should be deleted.</p> <p>Part 2, 3 of the policy relate to ambitions and actions for the parish council, these could not be used in the determination of a planning application, therefore it is recommended that they are deleted.</p> <p>Part 4 of the policy would be a requirement of a planning application, therefore it does not need to be repeated here. The new infrastructure charge requires new development to provide adequate funding to ensure waste water is managed appropriately.</p>	<ol style="list-style-type: none"> 1. Development will be controlled in accordance with SD 50 & SD 54. 2. The Parish Council to seek for Twyford to be added to the Southern Water Flood Reduction Project. 3. The Parish Council to seek active support from Southern Water for flood prevention measures outlined in WE1 and consideration of other possible measures to prevent water infiltration to sewers in the lower lying parts of the village. 4. Applications will need to provide a drainage plan to show that the drainage associated with the site will either utilise an existing mains drainage system at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar).

Agenda Item 11 Report PC19/20-43 Appendix 2

Policy MA1	Part 1 and 2 of this policy only refer to SDLP policies which already form part of the development plan, therefore repeating the policy is not necessary. The 3 rd part of the policy seeks to encourage the highways authority to deliver a local cycle path scheme, this would not be relevant in the determination of a planning application. Therefore it is recommended that this policy is deleted.	<ol style="list-style-type: none"> 1. Rights of Way will be protected in accordance with SD 20, 4, 5 & 6. 2. Residential development proposals will be permitted in accordance with SD 20. 3. The Highway Authority will be urged to complete a cycle route through the village
Policy MA2	The first sentence of the policy is not necessary as it only repeats policy SD22 which already forms part of the development plan. The second part of the policy refers to existing parking standards, there are currently no parking standards for the Winchester part of South Downs National Park. The SDNPA will be preparing a supplementary planning document to provide appropriate parking standards. Therefore the first sentence of the policy should be deleted. The remainder of the policy is appropriate as it provides local detail in relation to parking provision to supplement policy SD22 of the SDLP	<p>Parking will be provided in accordance with SD 22 and the respective standards of HCC as Highway Authority and WCC as Parking Authority.</p> <ol style="list-style-type: none"> 1. Development proposals that result in a loss of existing car parking spaces will only be permitted if it can be demonstrated that suitable alternative provision can be made in the vicinity. 2. Land to accommodate up to 40 additional car parking spaces is reserved on land adjoining the existing Parish Hall car park.
Policy MA3	Part 1 and part 2 of this policy do not relate to land use and could not be reasonably applied in the determination of a planning application, therefore it is recommended this part of the policy be deleted. The 3 rd part of the policy is already reasonably covered by policy SD21, SD21 also places emphasis on solutions which encourage sustainable forms of transport. Therefore it is recommended that this policy be deleted	<ol style="list-style-type: none"> 1. Minor roads in the Parish will be protected from excessive speed and unwanted parking by the introduction of minor traffic management measures, identified by the Parish Council and endorsed by the Highway Authority. 2. Pressure will continue to be put on the Highway Authority by the Parish Council, to introduce measures along the B3335 /B3354 to control its use by heavy goods vehicles. 3. Any new development in the village will be required to mitigate the impact of additional traffic and movement created by that development.
Policy MA5	Policy MA5 concerns itself primarily with encouraging sustainable forms of transport and traffic management proposals. These are not appropriate for Neighbourhood Plan policy, they are matters	

	for the highways authority to consider when reviewing the road network in the parish. It may be appropriate for these aspects to be stated as community aspirations or community aims, clearly identified as separate to land use policies of the TNP. This will allow the aspirations to be recorded within the TNP as a community aim, rather than deleted entirely as they are not appropriate as planning policy	
Policy SS2	As currently drafted the policy offers no further local detail to the policy requirements of SDLP policy SD48, therefore it is recommended that the policy be deleted	All new development should incorporate sustainable design features to reduce the impact on the environment. This is to be achieved through SDLP Policy 48.
Policy PO1	As currently drafted the policy offers no further local detail to the policy requirements of SDLP policy SD55. The second sentence of the policy sets out an action for TPC and is therefore not appropriate for NDP policy. Therefore it is recommended that the policy be deleted.	
Policy DEI	As currently drafted part a. of the policy offers no further local detail to the policy requirements of SDLP policies SD4 and SD5. The second part of the policy essentially repeats aspects of SDLP policies SD4 and SD5, therefore it is recommended that this policy is deleted	Development proposals will only be permitted where they: a) Comply with SDNP policies SD 4 and SD 5 and other relevant policies, in particular, Policy LHE2 (Landscape and Views). b) Are of high quality designs which, where relevant, clearly demonstrate that they have been informed by appropriate site based investigations and take account of the Twyford village character assessment which can be viewed on the TNP website.
Policy IDCI introductory text	The first paragraph of the supporting text incorrectly states that development should provide infrastructure particularly where there are existing deficiencies. Section 106 can only require developers to improve or enhance infrastructure where the development is likely to exacerbate existing issues. TPC are of course able to use their own CIL receipt to contribute to improving infrastructure and local facilities.	1. Development will only be permitted in accordance with SD 42 (2 and 3). 2. The deficiencies in adequate reasonable and necessary infrastructure in Twyford are set out in 1 – 7 above.

	<p>Part I of the policy only provides reference to existing development plan policies, therefore this aspect of the policy can be deleted. The second part of the policy is not a land use policy and could not reasonably be used in the determination of a planning application. This information could be presented as a community aim.</p>	
<p>Policy DBI</p>	<p>The SDNPA support the approach of requiring the production of a development brief to support a planning application. Particularly where this sets out development requirements which are appropriate and relate to community aspirations. The SDNPA also welcome the flexibility which is included in the policy to allow for alternative layout solutions to meet the housing requirement.</p> <p>Given the sensitive nature of the proposed allocation, the SDNPA would request that this policy states clearly the sensitive nature of the site, particularly the part of the site which sits on higher ground, visible from local public rights of way network.</p> <p>To allow flexibility at the development management stage, SDNPA suggest that the word indicative is included when referring to the map and possible layout of the site.</p> <p>The SDNPA would also request that some flexibility is offered in relation to the provision of public open space and car parking to allow a scheme to come forward which respects the sensitive nature of the site and possible landscape impact. The provision of open space is welcomed, but this may be more appropriately sited to reduce the landscape impact of the housing development on the site.</p> <p>The policy could also usefully refer to the extensive work the Parish Council have commissioned to prepare the development brief, and make this available as an appendix to the TNP</p>	<p>The land adjoining the Parish Hall Car Park, (as shown on Map 14,) is allocated for the development of 20 houses, subject to the preparation of a development brief to incorporate:</p> <ul style="list-style-type: none"> a) A minimum of 50% affordable dwellings. b) A mix of houses in accordance with policy HNI. c) Additional parking for around 20 cars, with further land for an additional 20 spaces, or other community use adjacent to the existing car park within the site d) The area of the tree clump as open space. e) The preparation of a comprehensive landscape scheme incorporating land to the east in the same ownership. f) The retention of boundary trees. g) Flood management measures as part of a comprehensive scheme for the land between B3335 and Bourne Lane. h) Foul sewerage scheme which does not impact on that part of the system which malfunctions in periods of high surface water flows. i) Design is <ul style="list-style-type: none"> a) to relate positively to the Surgery and Parish Hall b) to follow the principles of the <u>indicative</u> layout (shown on Map 14) unless there are clear advantages of an alternative layout. c) accord with DEI. j) Management of the land excluded from development.

		<p>k) Adherence to a Construction Environmental Management Plan coupled with careful design and the utilisation of standard pollution guidance to ensure adverse water quality effects on the River Itchen SAC is avoided.</p> <p>l) A drainage plan must be provided to show that the drainage associated with the site will either utilise an existing mains drainage system at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar). If the decision is to use a small package treatment plant then the drainage plan will need to demonstrate that there is no hydrological connectivity from the proposed Package Treatment Plant to the River Itchen for example are there existing watercourse or local drainage channels or a high water table, in the area of the proposed package treatment plan that will mean that the proposed package treatment would not be effective and would result in there being a high risk that phosphorous transferred into the protected River Itchen SAC and SSSI.</p>
Map 14	The map should clearly indicate that the layout and design proposed on the map is indicative.	Make clear that the map is an indicative layout for the proposed development.