

SDNPA comments on the Twyford Submission Neighbourhood Plan – agreed by SDNPA planning committee on 11 March 2021

Reference	Comment	SDNPA Recommendation
General comments	<p>The Parish Council and Neighbourhood Planning group should be commended on progressing the Twyford Neighbourhood Plan (TNP) to this stage. The preparation of the TNP has been complex due to the sensitive local environment and having to consider the sensitivity of internationally designated sites, and balancing this with the community's aspirations for development to meet locally identified housing need.</p> <p>The SDNPA also recognise the hard work and effort which has gone into selecting a site for housing, identifying a site which offers a range of community benefits as well as much needed housing. The site will require careful consideration in its development and we welcome the Parish Council's involvement in the Pre application process to date.</p>	
General Comments	<p>As previously stated in the SDNPA response to the Regulation 14 consultation there are a number of TNP policies which simply refer to a policy within the South Downs Local Plan (SDLP) and stipulate that the SDLP policy must be considered. As the SDLP will form part of the Development Plan, alongside the TNP, these references are not necessary. The SDNPA appreciate TPC have moved a large number of these policy references to the supporting text, but there are still policies which include signposting to a particular SDLP which isn't necessary, such as policy HNI.</p>	<p>Remove references to SDLP policy from TNP policies. If necessary and appropriate SDLP policy reference could be included within the supporting text of each TNP policy.</p>
General Comments	<p>As currently drafted the TNP policies include reference to policy numbers of previous version of the TNP. This could cause confusion for the reader and it is suggested that reference to previous policy numbers is removed.</p>	<p>Remove older policy references in policy title, for example at HN2 the older policy references should be removed Policy HN2 (HN2 & 3 amalgamated)</p>

Section I.3	The second sentence refers to the remaining 14 years of the plan period, however, the plan period remaining is currently 12 years.	It is a plan for the next 14 2 years to 2033
Section I, Paragraph I	Reference to a minimum of 20 dwellings should amended to read approximately as per SDLP policy SD26	Another key decision for Twyford is the allocation of one or more sites for a minimum of <u>approximately 20</u> dwellings between 2019 and 2033
Policy SBI	The supporting text to policy SBI refers to a minimum of 20 dwellings, this should be amended to read approximately 20 dwellings as per Policy SD26	The TNP is required to allocate land for a minimum of <u>approximately 20</u> dwellings
Policy SB2	The supporting text to this policy lists several SDLP policies to which this policy relates. However, many of these policies are not specific to development outside the settlement boundary, they are also concerned with development inside the settlement boundary, therefore this list should be revised or deleted. As currently drafted this policy does not make it clear that development outside the settlement boundary (in open countryside) will only be permitted in exceptional circumstances. This will ensure the reader understands that development outside the identified Settlement Boundary will only be permitted in exception circumstances, which include a range of policies set out in the TNP and SDLP.	Review the list of SDLP policies in the supporting text 1. Development outside the settlement boundary will <u>only</u> be permitted <u>in exceptional circumstances as per</u> subject to the following policies of the TNP as set out in detail as follows:
Policy HNI	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 New Forest Local Plan. There would also need to be evidence to support such a requirement in Twyford. The additional text does not provide sufficient justification for this approach	Provide additional evidence to justify the policy requirement for maximum floor areas for new housing
Policy HN4	Part 2 of the policy seeks to control the eligibility for occupation of the new affordable housing. However, as currently drafted it is not clear what these eligibility criteria are. The policy states that the eligibility for occupation is as set out in HN4-1, however, HN4 – is only a reference to	Policy HN4 – Rural exception sites 1. Proposals for rural exception sites will be permitted with SDLP SD29. 2. The eligibility for occupation will be as set out in HN4 – 1. [HN4 – 2]

	SDLP policy SD29. Clarification is required as to whether TPC are setting occupation eligibility as per the requirements in the SDLP. If HN4 is only signposting to SD29 and also referring to the occupation conditions set out in SD29, this policy is not required as it offers no more detail than policy SD29 of the SDLP.	
Policy HN5	Part 2 of the policy places extra policy restrictions in relation to the previous policy clauses set out at HN5 -1. Many of these additional requirements would be required by policy in the TNP or policies in the SDLP, therefore many of the additional criteria are not necessary and should be deleted. Point a is already covered by policy SD31. Point b is already covered by policy HNI, therefore these policy requirements can be deleted. Part 2c) should be presented as a separate policy relating to development in conservation areas. This will need to be addressed in order for the plan to meet the basic condition of conformity with the local plan and national planning policy; where plans should set out a positive strategy for the conservation and enjoyment of the historic environment. An assessment of how the loss of garden and walls within the Conservation Area will impact on the heritage assets is required.	<p>I. Development is subject to the following restrictions:</p> <p>a) for categories 1 a, 1 b and 1 d, the increase in floor space is limited to 30% and accords with SD 31.</p> <p>b) for category c, new detached houses should not exceed 150 m2</p> <p>c) within the Conservation Area there is to be no loss of garden land or walls</p>
Policy HN6	<p>Part 1a of the policy as currently drafted requires a limitation of 30% on extensions and replacement dwellings as per Policy SD30 and SD31 of the South Downs Local Plan. Policies SD30 and SD31 require a limitation of approximately 30% on this form of development and the TNP policy should be modified accordingly</p> <p>Part 1c of the policy appears to prioritise two particular types of institution. 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>a) For extensions and replacement dwellings, policies SD 30 and SD 31 will apply with <u>limitations of approximately the 30% being applied</u> in each and every case.</p> <p>c) At racing stables, hostel accommodation tied to the operation.</p>

<p>Policy HN7</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, there are a number of policy criteria which seem restrictive given the nature of the facility.</p> <p>Policy Criteria 1b states that the expansion of the facility must be justified by local need. It is likely that people from outside the parish may want to live in any expanded facility, and the wider need for elderly care provision needs to be taken into consideration.</p> <p>Part 2 of this policy, specifically Policy criteria 2a requires a landscape led design brief to be prepared. The SDNPA would require a landscape led approach to any expansion of the facility, but not necessarily a separate design brief.</p> <p>Policy clause 2c requires no increase in traffic generation as a result of redevelopment, given the potential range of redevelopment opportunities this may significantly restrict possible redevelopment</p> <p>Part 2 policy clause g only serves to repeat policy requirements covered by other policies in the TNP and SDLP and can therefore be deleted</p>	<p>Consider deletion or amendment to policy HN7 1b.</p> <p>2. The change of use or redevelopment of Orchard Close to residential will be permitted provided</p> <p>a) A landscape led design brief is first prepared <u>Any redevelopment should seek to</u> retaining the existing landscape garden with its trees.</p> <p>b) Any new buildings to be within or close to the footprint of the existing buildings.</p> <p>e) There is no increase in traffic generation.</p> <p>d) No new vehicular access point is formed.</p> <p>e) The Edwardian house may be retained or replaced as a private house.</p> <p>f) New dwellings to be for the elderly</p> <p>g) Affordable housing to accord with HN4/ SD 28.</p>
<p>Policy BE1</p>	<p>As currently drafted Policy BE 1 part 1 offers no further policy requirement than SDLP policy SD35. Therefore, this part of the policy is unnecessary as it only duplicates SDLP policy.</p> <p>Part 2 of the policy, applies SDLP policy to the specific local requirements, which is welcomed. However, the policy only allows for redevelopment on a like for like basis outside of the uses specified, this is considered too restrictive and should be deleted.</p>	<p>1. Within the settlement boundary, development, including change of use and redevelopment for economic purposes will be permitted, in accordance with SD 35.</p> <p>2. Outside the settlement boundary including 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 SD34 (a—d and g only). In other cases re-development will 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>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. Northfields Farm is identified as site W1 in the Employment Land Review Update (2017) as both an existing and potential employment site with the following commentary:</p> <p>‘Fully occupied mostly high quality business park for local businesses; adjacent to potential housing site in draft Twyford NDP; protected by draft general safeguarding policy in NDP; part of site permitted for new B uses.’</p> <p>Criterion 2 of Policy BE1 is unduly restrictive as it only allows like for like replacement of buildings on the estate. The supporting text refers to a new route to the north west of the site but no details are provided on the viability or feasibility of this new route.</p> <p>The site allocation 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 BE2.1b requires the preparation of a Master plan covering a wide range of matters. This is considered to be appropriate, if the entire site is proposed for development, however, the requirement for a Master plan is not necessary if a development proposal is submitted for a part of the site.</p>	<p>Consideration should be given to redrafting the policy so that it does not seek to control an extant planning permission. The provision of a Master plan is only relevant where proposals for the development of the entire site are submitted.</p> <p>Delete Criterion 2 of the policy</p> <p>Review supporting text specifically reference to a new route to the North West of the site, insufficient detail on this potential route. Provide further information or remove reference from supporting text</p>
<p>Policy LHE2</p>	<p>Supporting text for policy LHE2 refers to the adoption of SDLP policy SD4 and SD6 for Twyford, these policies will apply to Twyford as part of the development plan for the park so this reference is not necessary.</p>	<p>Delete reference to adoption of SDLP policies for Twyford</p>

	<p>The policy refers to SDLP policy SD4 and specific policy criteria. However, it omits policy clause 4 from part 2 of SDLP policy SD4. Policy clause 4 of SD4 is particularly important as it seeks to safeguard blue and green corridors. A number of the views set out in Table 3 relate to the Conservation Area and heritage assets within the parish. Reference within the policy is made to Policy SD4 of the SDLP. However, to be in general conformity with the policies within the SDLP, it should set out how SD4 2) is applicable to Twyford and how the Parish Council has demonstrated their understanding of the design principles of the landscape or illustrated how the protected views set out in Table 3, where heritage assets are listed, have been identified.</p> <p>More information on how these views contribute to the significance of the heritage assets as well as allowing an appreciation of the wider historic environment should be provided within the supporting text or a signpost to a document submitted as an evidence paper.</p>	<p>If references to SDLP policies are to be included in the TNP policy (although this is not necessary) reference to the relevant aspects of the policy is important</p> <p>Further clarification of how policy SD4 is to be applied in Twyford, it should set out how SD4 2) is applicable to Twyford and how the Parish Council has demonstrated their understanding of the design principles of the landscape or illustrated how the protected views set out in Table 3, where heritage assets are listed, have been identified.</p>
Policy LHE3	<p>This policy lacks focus of the various heritage assets located within the parish and refers solely to SDLP policies. The policy remains generic with little detail and it is not clear the purpose of the policy itself. There is no particular reference to what the areas are within the supporting text and the policy refers to a map which does not clearly define the areas listed in the key. It is also not clear where the supporting evidence can be found and the key conclusions/recommendations of this evidence. Policy LHE3 suggests that only the areas on the map are covered by the policy rather than all the heritage assets and the historic environment within the parish. In order to be in compliance with national planning policy, it is recommended Policy LHE3 should set out a positive strategy for the conservation and enjoyment of the historic environment. National Planning</p>	<p>Consider revision of policy wording to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale</p>

	Practice Guidance states 'neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale'.	
Policy LHE4	In line with the National Planning Policy Framework (paragraph 185), plans should set out a positive strategy for the conservation and enjoyment of the historic environment. In developing their strategy, plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.	In order to be in conformity with national planning policy, it is recommended that this policy is focussed on facilitating the conservation, enhancement and regeneration of the Conservation Area.
Policy LHE5	Supporting text to policy LHE5 refers to the relationship with a number of SDLP policies, the reference to policy SD2 Ecosystem services is incorrect Part 2 of policy LHE5 refers to 'open land', is this in reference to undeveloped land, rather than the character of the land being open? Clarification is required in the supporting text to define what the TNP considers to be open land.	SD 2 Ecosystem <u>Services</u> Provide clarification of the term open land in the context of policy LHE5
Policy LHE6	Part 2 of this policy proposes a cross border policy to ensure the conservation and enhancement of the river Itchen SAC. As drafted this policy cannot be applied in the determination of planning applications and proposes the development of new policy, this is not appropriate for the development plan and should be deleted. The SDNPA is preparing a technical advice note on Habitat Regulation Assessment matters, which will take into consideration international sites such as the River Itchen, as well as the provisions set out in policy SD9 of the SDLP Part 3 of this policy refers to the need to protect tree's hedges and woodland in Twyford, but specifically within the settlement boundary and conservation area. Is the reference to the settlement boundary and Conservation Area necessary, as currently worded the policy suggests that	Delete policy criteria 2 of policy LHE6 Consider rewording the policy to ensure the policy intention is clear

	SDLP policy SD11 will only apply within the settlement boundary and Conservation Area	
Policy WE1	It appears that some wording has been omitted before the policy criteria start. A currently drafted the policy does not make sense	Consider whether policy wording has been omitted accidentally and reword policy
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 2 nd 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 extended and enhanced to secure the objectives of SD 20, 4; 5; & 6. 2. TPC working with HCC and WCC will improve cycling facilities along the B3335/B3354 through the village from Hockley traffic lights to Golden Common. Land adjacent to this route will be safeguarded for this purpose.
Policy MA2	<p>The SDNPA's Parking Supplementary Planning Document will provide additional detail to supplement SDLP policy on this matter, therefore part 1 and 2 of the policy are not necessary and should be deleted.</p> <p>Part 3 of the policy is covered by requirements set out in Policy DB1 of the TNP therefore this aspect of the policy is also unnecessary and can be deleted.</p>	<p>Parking will be provided in accordance with SD 22 and the following:</p> <ol style="list-style-type: none"> 1. Until SDNP parking standards are adopted, the standard WCC (for residential) and HCC (for all other land uses) will apply. 2. 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. 3. Land to accommodate up to 40 additional car parking spaces is reserved on land adjoining the existing Parish Hall car park.
Policy MA3	As this policy is not related to land use matters it is recommended that the policy is stated as a community aspiration, and clearly distinguishable from planning policies	Delete policy and if appropriate state this as a community aim or aspiration
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	Delete policy and if appropriate state this as a community aim or aspiration

	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 SSI	As currently drafted policy SSI does not allow for the provision of solar panels or wind turbines. This is considered too restrictive and would not allow for small scale solar array or small scale wind turbines as per SDLP policy SD5 I	Consider review and amendment to policy SSI to align with the approach in SDLP policy SD5 I
Policy DBI	<p>The supporting text to Policy DBI states that 8 of the new homes are to be affordable, this does not comply with policies of the SDLP or TNP, this should state that 10 homes will be affordable.</p> <p>Part of the boundary <u>proposed housing site allocation is within</u> of the site is in close proximity to the Conservation Area. It is recommended that the policy includes a reference to the Conservation Area and its setting so that it sets out a positive strategy for the conservation and enjoyment of the historic environment and enables development that will make a positive contribution to the heritage asset and reflect and enhance local character and distinctiveness.</p>	<p>Site 26 is the principle site for allocation of new houses in the Neighbourhood Plan, and is to provide 20 houses (see HN3) of which 8 <u>10</u> are to be affordable (see HN3) and additional car parking (see MA2).</p> <p><u>Include a reference to the whole allocation being in close proximity to the Conservation Area and part of the housing allocation site falling within the</u> the close proximity of the Conservation Area to ensure the development can make positive contribution to the setting of the Conservation Area <u>and its setting</u>.</p>