

Twyford Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear vision for the neighbourhood area. It develops a series of policies which get to the heart of its character and the appearance.

The presentation and layout of the Plan is very good. The difference between the policies and the supporting text is very clear. The Plan makes good use of various high-quality maps.

The package of supporting documents is both comprehensive and helpful. The Sustainability Appraisal and the associated site selection process and documentation provide a helpful context to the housing sites included in the Plan.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now in a position to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to ensure that the Plan meets the basic conditions.

I set out specific clarification points below in the order in which they appear in the submitted Plan.

Policy SB2

The approach in this policy helpfully identifies the range of uses which may receive support outside the settlement boundary. However as currently drafted it does not make it clear that development outside the settlement boundary (in open countryside) will only be permitted in exceptional circumstances and which may include a range of uses related to policies set out in the Local Plan and the submitted neighbourhood plan.

I am minded to recommend a modification to achieve this effect. Does the Parish Council have any comments on this proposition?

Policy HN1

The details in the second part of the policy are very specific.

Does the Parish Council have the evidence to support such an approach?

Policies HN3, HN4 and HN5 (second part a/b)

Do these policies bring any added value beyond the relevant Local Plan policies?

Policy HN7

Has the policy's content now been overtaken by the recent change in ownership of the site?

Could the approach in the second part of the policy be equally well applied to uses other than residential and which would be consistent with the building and its location?

Policy BE1

As Policies HN3/4.

In any event the policy and elements of the supporting text read as being more onerous than local and national planning policies. Please can the Parish Council clarify its approach to this policy?

In addition in the second part of the policy is the 'like for like' approach reasonable?

Policy BE2.1

I saw the scale and significance of Northfields Farm and the Hazeley Enterprise Park when I visited the neighbourhood area.

As I read the policy it appears to conflate the preparation of planning policy, the need or otherwise for a master plan to guide development on the wider site and the ongoing implementation of extant planning consents. Please can the Parish Council advise on how it approached these matters?

In terms of details:

- are there specific reasons why the feed mill needs to be removed before any further commercial development takes place on the site?
- is it reasonable to require that any development should not proceed before a master plan is agreed?
- in any event how does the Parish Council anticipate that a master plan would be prepared?
- is the approach in the final sentence reasonable in requiring that elements of landscaping are located outside the site (notwithstanding any joint ownership matters)?

Policy BE3

Would it be reasonable for a master plan to be required to assist in the determination of smaller, day-to-day development proposals?

The third part of the policy reads as supporting text rather than policy. I am minded to recommend that it is relocated to the supporting text. Does the Parish Council have any comments on this proposition?

Policies CP1/CP2

Is the added value of these policies (beyond Local Plan policies) the identification of the sites/assets concerned?

Policy LHE1

This policy includes an excellent assessment of parcels of land concerned. The crafting of policy wording is also well-considered.

Policy LHE2

How does the Parish Council anticipate that this policy would be applied in combination with Policy SD4 of the Local Plan?

Policy LHE3

Is the added value of this policy (beyond the Local Plan policy) the identification of sites?

Policy WE1

There appear to be some words missing. Please can the Parish Council advise?

Policy WE2

This policy reads as a process requirement matter rather than a policy. I am minded to recommend that it is repositioned into the supporting text. Does the Parish Council have any comments on this proposition?

Policy MA2

As I read the wider Plan the third part of the policy addresses a matter which is part of the wider housing allocation off Hazeley Road rather than a free-standing proposal. Please can the Parish Council clarify its thinking on this matter?

Policy MA4

Is the policy necessary?

Policy MA6

Is the added value of this policy (beyond the Local Plan policy) the identification of the rural routes?

Policy SS1

This policy takes a more restrictive approach to that in Policy SD51 of the Local Plan.

Is there a specific reason for the approach taken?

Policy DE1

Is the implication of the policy's approach that developments which do not follow its advice will not be supported?

Policy DB1

This policy incorporates an excellent development brief for a neighbourhood plan.

Should it make specific reference to the conservation area?

Policy DB2

Is the second part of the policy effectively the two criteria which follow on from the first part of the policy?

Policies LHE4, LHE6, WE1, MA1, MA3 (the first two parts) and M5

These policies address a series of interesting matters. However, they are community actions (something which the Parish Council or the Parish Council with others intends to implement) rather than land use policies.

In order to retain their importance within the Plan I am minded to recommend that they are repositioned into a separate part of the Plan as highlighted in national planning policy. Does the Parish Council have any comments on this proposition?

Policies ST2, LHE7, SS2

These policies do not appear in the shaded policy boxes which are used elsewhere in the Plan.

Please can the Parish Council clarify which elements of the relevant sections are intended to be policies?

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan?

In particular does it wish to comment on the representations from:

- Twyford School;
- Historic England;
- The Humphrey Group; and
- The South Downs National Park Authority

Protocol for responses

I would be grateful for responses and the information requested by 26th May 2021. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

In the event that certain responses are available before others I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it come to me directly from the National Park Authority. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

Twyford Neighbourhood Development Plan.

20 April 2021