

Regulation 16 Consultation

Response from EWPC to Representation by Mr. M Bell

Comments as follows – (numbers correspond to the paragraph number in Mr Bell’s submission):

(Points 3 and 4). We have addressed Mr. Bell’s contention that there are further Minutes that he has not seen in several earlier submissions and correspondence with him, all of this is included in the Consultation Document. There is nothing else.

To be precise, in his point 4, Mr. Bell has not quoted fully from EWPC’s November 2021 email in Appendix H – it has been explained several times that a decision was made, and documented, that no further Minutes would be kept, but that a **report** of the activity undertaken by the NP Steering Group would be given at each Parish Council meeting – these Minutes are available publicly on the EWPC website. This way forward was adopted because it was felt that all key decisions had been made and subsequent work was about wording/layout/ presentation and there was no need for copious Minutes on textual or presentational changes.

For clarification:

1) Every comment received from all members of the public by the EWPC NP Steering Group is included in the Consultation Document (Appendix F and Appendix G) and a response is given to all. Many of the comments made in this latest representation from Mr. Bell have already been covered:-

- Consultation Document Appendix G - letter from Mr. Bell dated 8th August 2021, with our comprehensive responses in red at the end of the letter.
- Consultation Document Appendix H - the EWPC Sports Club statement of June 2021.
- Consultation Document Appendix I - response from EWPC to Mr. M Bell’s emails of the 6th and 22nd October 2021.

2) It is accepted that, as a matter of good practice, Mr. Bell should have been consulted in more detail. This is an oversight, which was acknowledged in our letter to him of 21st November 2021, when we tried to engage with him with a view to seeking his consent to the cricket club NP designations. In that letter, we endeavoured to open the lines of communication but were rebuffed in his email of 14th December 2021, which was, unfortunately, ‘lost in the ether’ and the first time we saw it was in his Regulation 16 Consultation response.

3) It would appear that Mr. Bell has three key issues which he wishes us to address:

I. That the cricket club is designated as a Community Facility.

II. That the land on which the cricket club sits is designated as Local Green Space.

III. Reassurance that the land on which the cricket club sits will not be built on nor used for a possible new sports facility.

In short it is the combination of the two (Community Facility and Green Space) which led us to designate this area as a Community Facility and as Local Green Space. If the cricket club were not on

this land then it would be no more than a field in the AONB and as such would not be valued as Local Green Space; but the cricket club will always remain a valued Community Facility wherever it is sited.

In more detail the logic is:

I) The cricket club is designated as a Community Facility. (Points 7-13, 16)

- a) It is not a 'private' members club any more than the sports club is. That people have to pay a membership fee does not make it 'exclusive'. It is open to anyone, quite simply, with an interest in the sport for payment of an annual fee; it is not restricted by a selection process or by certain background or other criteria. Indeed a check on its website says against the '100 Club' section: *"As a club with a clear "cricket for all" philosophy we keep annual subscriptions and match fees to an absolute minimum to prevent it being a bar on playing."*
- b) It is a popular club, growing in membership.
- c) Historically, the club has been in existence for c. 100 years; it is highly regarded – partly because of its location which was voted 'Ground of The Year' for the whole of Hampshire in 2014, 2017 and 2019.
- d) Mr. Bell, as the owner of the land on which it is situated, has ensured certain 'rules and regulations' are adhered to by the cricket club and its members (Point 11); this is fair and ensures that the land and its environs are respected; but this does not take away from the fact that the entity of the club itself is valued by its members and therefore, by the local community. (That some of the members of the club do not live directly within a short distance of the club is not relevant to this discussion; as all clubs have membership from a variety of locations (Point 12).
- e) Both the cricket club and the sports club (tennis) would function wherever they were located.
- f) The cricket club was consulted by EWPC before it was included in this listing. The comments from the cricket club listed (Point 16) will of course be carefully couched as the cricket club is treading a fine line between their landlord, Mr. Bell who owns the land, and the EWPC. None of us would like to see the lease to the club fail, after some 100 years in the parish.

Summary: We appreciate the points which Mr. Bell has raised. However, regarding the cricket club as a valued community facility, our logic, as set out above, says the club is an entity on its own and therefore is a community facility; we would like it to be included as that is what our Parishioners would want and to leave it out would seem at odds with the ethos of the NPPF and neighbourhood planning.

II) The land on which the cricket club sits is designated as Local Green Space.

- a) The cricket club as an addition to the land has given that land 'value' in terms of being cherished by the local community.
- b) The cricket club was voted Hampshire's 'Ground of the Year' in 2014, 2017 and 2019; a reflection of the idyllic setting this land provides.
- c) The cricket club has existed for some 100 years and as such now seems synonymous with the land, as viewed by the local community.
- d) It sits within the AONB and the conservation area of the parish.

- e) The land on which the cricket club sits, we contend, is valued as Local Green Space because it falls within the criteria listed by the NPPF and Mr. Bell (Point 30):
“The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.”
- f) The land, as we have explained in earlier notes, has been host to a cricket club for many years, serves members of the community close to it and from further away and is highly regarded for its special setting. We have demonstrated its value to the local community by citing these special attributes. For example, history in terms of its longevity on the site and the value given by external assessors regarding its beautiful setting: Hampshire ‘Ground of the Year’ in 2014, 2017, 2019. It does have recreational value and is not an extensive tract of land. It fulfils criteria a), b) and c) above.
- g) The land without the cricket club is nothing more than another field within the AONB.

Summary: It can be seen that if the cricket club were not in situ, then the land would be simply a field on the edge of East End conservation area and in the AONB – it would not be worthy of listing as Local Green Space. It is the presence of the cricket club which gives it value.

It is a conundrum and one which we would very much like to have worked out with the owner of the land, Mr. Bell. In absence of meeting we offered him the decision to withdraw the cricket club/land from both designations – his response was that decision should be made by EWPC.

There seems to be some concern that the designations will cause it to be more ‘vulnerable’ to future development. Our view is that the designations will give it greater protection from future development, though ultimately such development is in the hands of the landowner.

III) Reassurance that the land on which the cricket club sits will not be built on nor used for a possible new sports facility.

- a) This concern has been addressed in the sports club statement dated June 2021 and in the EWPC response dated 29th November 2021. In both it is made clear that:
“EWPC will not support plans to acquire new or existing sports sites, or to develop or expand community facilities within the Parish without the express consent of owners of the land in questions and without the support of the users of that site. In such an eventuality then it would be appropriate to undertake consultation with all members of the Parish. I am not aware of any plans for such development.

A Parish Council cannot state categorically that a specific area of land is not, or will not be at risk of development, simply because it has no power or control over planning and development. All it can do is seek to influence those who do have such power and control (namely, Basingstoke and Deane Borough Council). The above extract from the Statement therefore seems to us to be as far as we can go in allaying Mr Bell’s concerns. For the sake of clarity, EWPC has no intention of proposing any development of Mr Bell’s land.”

- b) In his email of 14th December Mr Bell references Policies CF1 9.8 and 9.9. These have changed numbering to Policy CF1 8.8 and 8.9. With these policies we are endeavouring to fit with guidance given from BDBC and from the Government – we are encouraged to support the necessary development of community facilities – but not where there is a “negative impact on the amenities of adjoining residential properties” (Policy CF1 8.8) and only “where there is a demonstrated community need” (Policy CF1 8.9). His reference to Sungrove Farm is well made and had this Neighbourhood Plan been in place when that decision was made it may have had some influence on the ultimate planning decision made.

Summary: We could amend paragraphs 8.8 and 8.9 of Policy CF1 to state that the consent of the landowner on which the relevant Community Facility stands would be required.

Conclusion

- a) (Point 5) BDBC Legal team have reviewed and confirmed the EWPC NP meets the Basic Conditions.
- b) (Points 23 and 24) We note suggestion that reference to the cricket club as a community facility may be unlawful. We are not experts on this matter but have identified our logic above – made in good faith and with good intentions. None of us have any wish to enter into lengthy lawsuits about the issues.
- c) We believe the cricket club should be listed as a Community Facility; the land on which it sits should be listed as Local Green Space; we have addressed the issue of sports facilities and suggest we can slightly amend our policy to address Mr Bell’s point regarding consent from the land owner.
- d) We are unable to identify or understand the ‘harm’ that the above designations might cause to Mr. Bell’s land (which seems to be part of his concern); we can only see that it offers it further protection and reflects its value to the community; but if he really does not wish the land to be listed as Local Green Space then it can be removed.
- e) We contend that the cricket club is a Community Facility as it would be valued wherever it was situated.



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and Deane

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Amy White,
Parish Clerk
East Woodhay Parish Council,
Via email

Your ref: Submission East Woodhay Neighbourhood Plan

Tuesday 3rd May 2022

Dear Amy,

**Local Planning Authority response to the East Woodhay Neighbourhood Plan:
Post-Submission Consultation (Regulation 16)**

The Local Planning Authority (LPA) fully supports the initiative of East Woodhay Parish Council to produce a Neighbourhood Plan (NP). The LPA recognises that a significant amount of work has gone into the development of the NP, and that extensive community involvement has taken place. The Neighbourhood Planning Group are commended for all their efforts in order to reach such an advanced stage in the NP making process.

Following the submission of the East Woodhay Neighbourhood Plan (BUR NP) on 1 March 2022, the LPA undertook a Legal Compliance Check. The LPA confirmed, via letter to the parish council on 10 March 2022, that it is satisfied that the EW NP and accompanying documents comply with the statutory requirements as set out in Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The following comments have been made by the LPA and submitted as a formal representation on the Submission EW NP. These comments have been provided to assist the independent examination of the NP and have been agreed by the borough council's Portfolio Holder for Planning and Infrastructure.

We are pleased to see that many of the LPA's comments on the Pre-Submission EWNP have been addressed. The LPA has identified a limited number of

outstanding issues, but none of these go to the heart of the plan or affect its potential to meet the basic conditions.

Appendix 1 identifies these outstanding issues which mainly relate to specific issues regarding the drafting of the policies and potential issues with their interpretation and implementation.

For your information, attached is a schedule which records how the comments made through the course of the pre-submission consultation have been addressed in the submission version. This also sets out where outstanding issues/concerns remain.

I hope that the comments provided are of use to you. If you require further information or clarification please do not hesitate to contact me on 01256 845175 or by emailing robyn.milliner@basingstoke.gov.uk.

Yours sincerely

Robyn Milliner
Senior Planning Policy Officer

CC: Paul Hurst – East Woodhay Neighbourhood Plan Steering Group

How the LPA's comments on the Pre-Submission draft Plan have been addressed in the Submission Neighbourhood Plan and Remaining Issues.

The table below sets out the comments provided by the LPA in response to the pre-submission Regulation 14 consultation in 2021, and how these have been addressed by the submission version of the Plan.

Section /Policy of the pre-submission plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
Natural Environment Policies						
Policy NE1: Protecting the Landscape, pg 28	Policy NE1: Protecting the Landscape, pg 24	<p>The policy seeks to protect the historic and natural landscape and local character of the parish and references the North Wessex Downs AONB management plan and a number of important characteristics of the landscape that are found locally.</p> <p>Generally, the policy is supported.</p>	PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It	Clarify the requirements in relation to the reference to <i>historic</i> within the policy.	Met, the policy has been amended and the reference to historic has been removed.	

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		<p>However, it is not clear how the historical aspects should be interpreted. While the concept of historic landscapes exists, it is not clear what it entails for the purposes of this policy or how the decision maker should assess this issue, which would make the policy difficult to interpret. This policy also applies a higher test to historic landscapes than to conservation areas i.e. the policy states preserve <i>and</i> enhance, which seems inappropriate.</p>	<p>should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).</p>			

Section/Policy of the pre-submission plan (Reg 14)	Section/Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
Policy NE2: Key views, pg 28	Policy NE2: Key views, pg 36	<p>The policy identifies a number of local key views.</p> <p>It is not necessarily clear from the neighbourhood plan and supporting text as to why these views are considered as important. It would be helpful to include justification as to how these views have been chosen and the reasons for doing so. The keys views seeking to be protected need to either be justified in the supporting text or within an evidence base document.</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p>	<p>Include a table or some supporting text/evidence which justifies the inclusion of key views, see Burghclere Neighbourhood Plan Key Views Report evidence base document</p>	<p>Met, reference has been removed in relation to views from existing buildings or structures.</p> <p>Since the pre-submission draft, new policy criterion has been included (para 7.18) which states that 'selected but not exclusive key views' are identified in maps 3 to 7. It then states that 'for further assessment of key view criteria see section 7.14 and 7.15'. It is not clear what the key views within the policy are and where these additional key views are to be found.</p> <p>If these other key views are from specific documents, they should be referenced so it is clear to the decision maker where they apply.</p>	<p>Agree with suggested change. In response propose the following change to the NP.</p> <p>Pg 25, Key Views Section 7.17:</p> <p>"A number of specific Key Views are identified on Maps 3 to 7 (following) and shown in adjacent photographs. These are examples of views within the area but are not an exclusive list, as other views will be considered "key" if they meet the criteria in section 7.14 above".</p>

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		<p>The policy stipulation within paragraph 8.19 appears to seek to protect private views from buildings. This is not something which can be protected by the planning system and hence this policy requirement should be removed.</p>		<p>Remove the policy stipulation covered by para 8.19 or amend to clarify this requirement in order to prevent the apparent implication that it is seeking to protect private views.</p>	<p>If these selected but not exclusive key views are to be retained it is suggested that additional wording is added to the policy in order for the decision maker to be able to apply the policy. Some suggested wording is provided below:</p> <p>‘A number of specific Key Views are identified in the Maps 3 to 7. Other views will be considered ‘key’ if they meet the criteria in EWNP para 7.15’</p>	<p>Key views remain as listed</p> <p>Pg 36, Policy NE2 Key Views, Section 7.18:</p> <p>“A number of specific Key Views are identified in the Maps 3 to 7. Other views will be considered “key” if they meet the criteria in 7.14 above.”</p>

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Policy NE4: Trees & Hedge rows, pg 44	Policy NE5: Trees and Hedgero ws, pg 43	<p>The policy seeks to protect trees, copses and hedgerows within the parish. Where this is not possible, replacement planting is required which should be appropriate for the site and deliver a net gain in biodiversity.</p> <p>The opening requirement of the policy should specify that the focus of the policy is on losses of vegetation which are important to the character of the</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood</p>	<p>It may be appropriate to add some additional supporting text providing clarity for some of the requirements in the policy as per the comments box.</p> <p>These are considered to be drafting issues which</p>	<p>Met.</p> <p>Further information has been added to the policy which notes that the 4m separation distance is derived from the council's Landscape, Biodiversity and Trees SPD.</p> <p>Further detail has also been added to the policy and the structure has therefore been improved.</p>	

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		<p>area or for environmental reasons, as it would not be reasonable to refuse a planning application for the loss of a small non-native tree in a back garden for example.</p> <p>It is also not clear where the 4m separation distance is derived from and it may be helpful to include some information in the supporting text regarding this. It is also not clear what the separation referred to is from, for example is it</p>	<p>plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics</p>	<p>would improve implementation rather than concerns regarding compliance with the basic conditions.</p>		

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		other trees or buildings?	and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041- 20140306).			
Historic Environment and Heritage Conservation Policies						
Policy HE1: Conse- rvation Area and its setting , pg 63	Policy HE1: Conserv- ation Area and its Setting, pg 62	The policy requires development within the North End and East End Conservation Areas to demonstrate how they will retain, conserve and enhance the historic character of these hamlets and sets a	Legislation requires planning polices to conserve or enhance, not both, this wording is reflected within the Local Plan Policy EM11 (The Historic	Suggest amending of wording to conserve or enhance to be in line with relevant legislation.	Partially met. The wording within the policy remains as 'retain, conserve and enhance' as per the pre-submission neighbourhood plan. It is suggested that this be amended to 'conserve or enhance' in line with relevant legislation.	Agree with suggested change. In response propose the following change to the NP: <i>Pg 62 Policy HE1, Conservation area and its Setting, Section 9.17</i> :

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		<p>number of criteria when development proposals would be acceptable.</p> <p>In relation to criterion a) design and materials could also be added to the list in the second sentence.</p> <p>In relation to criterion c) 'without the need to substantially rebuild the heritage asset' could be added to the end of the sentence.</p> <p>The Conservation Area Appraisals are not referenced</p>	<p>Environment). If the NP requires development proposals to conserve and enhance the historic environment additional justification for this will be needed to justify as a special local circumstance.</p>	<p>Additional requirements could also be added to criterion a) and c).</p> <p>Reference the Conservation Area Appraisals within the policy.</p>	<p>There have been a number of changes to the policy which are supported, including additional criterion to a) relating to design and materials. Furthermore, additional wording has been added to criterion c) as suggested.</p> <p>The Conservation Area Appraisals are now referenced within the policy as suggested in comments provided previously.</p> <p>In the supporting text it is recommended that the following amendments could be made for clarity:</p>	<p>“conserve or enhance the historic character...”</p> <p>No further changes proposed in response to the representation.</p>

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		within the policy and it may be helpful and consistent to reference these within the policy.			‘There are a number of non-designated Heritage Assets of historic and architectural merit across the Parish. These include those which have been formally placed on the Local List and others which are <u>may be</u> worthy of local listing but not yet identified. <u>These may be identified during the course of a planning application. Some of these structures are included in</u> The Local List. <u>Other structures have been identified as Notable Structures within conservation areas, this</u> is intended to recognise these buildings so that they can be properly considered when	

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					development proposals are submitted to BDBC.'	
Policy HE2: Protect- ing and Enhanc- ing Local Built Herita- ge Assets , pg 63	Policy HE2: Protect- ing and Enhanc- ing Local Built Heritage Assets, pg 63	<p>The policy seeks to protect and enhance local heritage assets.</p> <p>It is not clear how this policy could be applied consistently, and how development proposals should demonstrate the requirements within the policy, furthermore there is nothing in the supporting text to assist with this for instance should this be through a design and access statement? It may</p>	<p>Legislation requires planning polices to conserve or enhance, not both, this wording is reflected within the Local Plan Policy EM11 (The Historic Environment). If the NP requires development proposals to conserve and enhance the historic environment additional justification for this will be</p>	<p>Review the need for this policy in light of current adopted Local Plan policy and national guidance.</p>	<p>Partially met.</p> <p>A number of new criteria have been added to the policy and comments are outlined below:</p> <p>Para. 9.22, '<u>and should not harm that significance</u>' could be added onto the end of the paragraph.</p> <p>Para 9. 23, could be amended to '<u>any proposals which impact the significance of a</u> heritage asset must confirm to BDBC's Local Plan Policy EM11 and the principles laid out in the Heritage SPD (March 2019).</p>	<p>Agree with suggested change. In response propose the following changes to the NP:</p> <p><i>Pg 63 Policy HE2 , Protecting and Enhancing Local Built Heritage Assets, Section 9.22:</i></p> <p><i>"All development proposals, to or within the setting of a Heritage Asset, should demonstrate a good understanding of the significance of that Heritage Asset and should not harm that significance."</i></p>

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		<p>also be helpful to include a map showing local heritage assets or a list of these.</p> <p>It is suggested the title of the policy is amended to 'Protecting or Enhancing Local Built Heritage Assets' to ensure it is in line with relevant legislation and the Local Plan.</p> <p>It is questioned whether this policy is needed as it is more lenient than the Local Plan policy and does not add any locally</p>	<p>needed to justify as a special local circumstance.</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise</p>		<p>Para 9.24 (f) could be amended to read 'that any residual harm <u>to a designated Heritage Asset</u> is justified on the basis of public benefit that could not otherwise be delivered'.</p>	<p>Pg 63 Policy HE2 Section 9.23, change to start of paragraph</p> <p>"Any proposals which impact the significance of a Heritage Asset on the Local List...."</p> <p>Pg 63 Policy HE2 Section 9.24 f):</p> <p>"That any residual harm to a designated Heritage Asset is justified on the basis of public benefit that could not otherwise be delivered."</p>

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		distinctive elements that reflect the neighbourhood area. Given the loose nature of the policy it could subsequently have a negative impact on the historic environment.	and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041- 20140306).			
New Development and Housing Policies						
Policy HO1: Good Quality	Policy HO1: Good Quality	The policy permits planning applications where they have regard to	Paragraph 16 of the NPPF: Plans should:	Ensure overlap or duplication between	Partially Met. The policy has been revised significantly from	To remove the highlighted conflict between Policy HO1 d)

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Design , pg 65.	Design, pg 66	<p>the Village Design Statement, achieve high quality design and regard to the Conservation Area Appraisals.</p> <p>Criterion c) appears to duplicate the policies and requirements contained within HE1 and HE2 and it may not be necessary to have within this policy. If retained, the wording in criterion c) could be amended to 'comply with the advice in' rather than 'have regard to'.</p>	f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).	policies is limited.	<p>the regulation 14 consultation and has a substantial amount of new text.</p> <p>The transferral of Policy RC1 in the pre-submission document into a new Policy HO1 which addresses design for all types of development is welcomed.</p> <p>Criterion d) may provide some conflict between Policy NE2: Key Views.</p> <p>It is suggested that criteria (g) of Policy HO1 which relates to Design and Access Statements is amended to require the development to demonstrate that it has</p>	<p>and the Key Views Policy NE2 propose the following change to the NP:</p> <p>Pg 66 Policy HO1, Good Quality Design Section 10.22 d)</p> <p>“Retain where possible attractive outlooks into, through and from the site.”</p> <p>Agree with comment on HO1 g) and propose the following change to the NP:</p> <p>Pg 66 Policy HO1 Section 10.22 g)</p>

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		While this is not a requirement in order to meet the basic conditions, it may be worth considering combining this policy with RC1, as they are both seeking to address design issues.			<p>been designed to comply with the requirements of the policy, rather than specifically refer to a Design and Access statement.</p> <p>In relation to criterion h) Planning Practice Guidance is clear that neighbourhood plans are unable to implement new standards for residential development through neighbourhood planning. However, it is acknowledged that Policy EM9 of the ALP does already include this standard, and although this would be duplicating the Local Plan this is not considered harmful as it is such an important local</p>	<p><i>“Include a written statement or a Design and Access Statement, depending on the scale and complexity of the scheme, demonstrating that the development has been designed to comply with the requirements of this policy.”</i></p> <p>Agree with comment on HO1 10.22 h) and propose the following change to the NP :</p> <p><i>Pg 66, Policy HO1 10.22 h)</i></p> <p><i>“For residential development only meet optional Building</i></p>

Section/ Policy of the pre-submission plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
					issue. The criterion should also be clear that this standard relates to residential development only.	Regulations water efficiency standards of 110 litres per person per day or less."
Policy HO2: Settlement Policy Boundary and Building in the Countryside, pg 67	Policy HO2: Settlement Policy Boundary and Building in the Countryside, pg 68.	<p>This policy specifies where development should take place within the parish, i.e. within the Settlement Policy Boundary, and sets out what exceptions to this principle are considered to be permissible.</p> <p>The first section of the policy refers to development within the Settlement Policy Boundary and states that this</p>	<p>Paragraph 16 of the NPPF:</p> <p>Plans should:</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p>	<p>Include reference within the policy wording to amending the settlement policy boundary, as at present there is no reference to amending the current boundary.</p>	<p>Not met.</p> <p>Map 23 shows an extension to the Woolton Hill settlement policy boundary. However, this uses an old base map that does not clearly show that the land it is including is already developed.</p> <p>The council agrees that the SPB should be amended to reflect the development which has been completed at Meadowbrook and would be happy to provide an</p>	<p>No proposed change to Map 23, it shows the existing SPB and the proposed revision to reflect recent development. The NP formally requests this change to the SPB on Pg 68, Section 10.25.</p> <p>We do not propose a change with regard to the representation concerning Pg 68 Policy HO2, Settlement Policy Boundary and Building in the Countryside, Section</p>

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		will be permitted as long as it complies with the design policies within the plan. From a drafting perspective this would helpfully refer to all relevant policies, not just design. However, even if amended accordingly, this is a questionable requirement, as non-compliance with a design policy does not render the whole principle of development unacceptable, it just means it would be contrary to a particular policy.		Provide clarity regarding criterion c) and consider how the decision maker would apply this when determining a planning application .	updated map which shows the development built out. A new criteria d) has been added in policy HO2 and the previous criterion c) has been removed. This new criterion reads that outside the SPB development and redevelopment proposals will be granted if 'they do not result in the SPB being joined to any neighbouring area, nor a loss of green space between settlements within the Parish, between the Parish and any neighbouring Parish, or between the Parish and Newbury'.	10.30 d) as during both Reg 14 and 16 consultations maintaining a green space between settlements was key feedback from the community. During all consultation a majority of the community fed back that with proposed significant development recently put forward for two green gap areas they felt the character of the parish was threatened. This was combined with a view from the community, that they believed Local Plan Policy SS6 (New Housing in the Countryside) was not being applied

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		<p>The wording of criterion b) is considered to need amending. At the moment the exceptions referred to related mainly to policies in the current BDBC Local Plan. However, once those policies have been replaced via the LPU these policies would no longer have any force and hence would not provide any limitations, meaning this restriction would effectively fall away. Therefore, if the Parish Council would like the</p>			<p>The council is concerned that this criterion is not clear and would be difficult to implement.</p> <p>It is not clear how it would be determined whether a development resulted in Woolton Hill's SPB 'being joined to a neighbouring area' – as it is not entirely clear what scale of development is included in the term 'neighbouring area'.</p> <p>Furthermore, it is considered that <u>any</u> development in the countryside would result in the loss of green space between settlements (that would be contrary to this policy), and this would be</p>	<p>consistently by the LPA and the countryside gaps were therefore under threat and the NP should reflect this concern and have a local policy that gave some degree of protection.</p> <p>Policy for Drainage into the River Test is now included in the Reg 16 Resubmission.</p>

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>limitations in question to be retained in their policy then they need to set them out in full. Even if they did so this policy could be superseded by a subsequent BDBC Local Plan policy if there is a conflict, but that is probably preferable to the policy restrictions being relied upon being lost all together.</p> <p>In relation to criterion c) it is not clear what would be defined as 'stealthy expansion' as</p>			<p>stricter than the NPPF which does not support a blanket restriction on new development in the countryside. Although there may be locations where harmful coalescence between settlements could occur, it is not clear how such a broad restriction is justified.</p> <p>There are also wording difficulties with the policy because by their very nature there would not be green space between East Woodhay parish and neighbouring parishes (as they adjoin), and development between the Parish and Newbury would be outside of East</p>	

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>referred to in the policy. This is not considered to be appropriate wording for inclusion within a planning policy and needs to be amended.</p> <p>There is a map adjacent to Policy HO2 (of page 66) which shows an extension to the settlement policy boundary of Woolton Hill, however, this has not been referred to in the policy or the supporting text of the policy. Any extension to the Settlement Policy</p>			<p>Woodhay Parish within West Berkshire's administrative area, and so outside the control of this NP.</p> <p>There is no information within the supporting text or evidence base documents relating to how the policy would be implemented or why it is justified.</p> <p>Since, the designation of the neighbourhood plan area, the issue of nutrient neutrality has become apparent in the borough. This relates to the Solent, which is designated as a Special Protection Area, Special Area of Conservation and a</p>	

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		Boundary will need to be explained in the Plan itself and is likely to require justification via an evidence base document.			<p>Ramsar site. There are high levels of nitrogen and phosphorus entering this water environment from a variety of sources and there is evidence that these nutrients are causing eutrophication.</p> <p>Following the receipt of advice from Natural England in October 2019, the council has not issued decisions for new residential development or overnight accommodation in the River Test and Itchen catchment area (which ultimately discharges into the Solent) unless it can be shown to be nutrient neutral. A very small section of the River Test</p>	

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					<p>catchment is located in the west of the Parish. It is therefore recommended that a map of the relevant area and an additional sentence is included within the policy referring to the issue. It is suggested that this wording is in line with that in the Local Plan Update:</p> <p>'New dwellings and development resulting in a net increase in population (including student accommodation, and tourist attractions and accommodation) served by a wastewater system that will discharge into the River Test and Itchen catchment will be required</p>	

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					<p>to demonstrate nutrient neutrality'</p> <p>The supporting text of the policy should also refer to the advice which has been issued by Natural England.</p> <p>The proposed Local Plan Update wording for nutrient neutrality can be found on page 70 of this document.</p>	
Policy HO4: Housing Mix – Provision of Smaller	Policy HO4: Housing Mix – provision of smaller homes, pg 71.	<p>The policy seeks an appropriate housing mix for new residential development within the parish.</p> <p>The principle of this policy is supported</p>	Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This	Clarify the wording concerning the mix of market units (as per the comments box).	<p>Not met.</p> <p>However, it is considered that this could be easily amended through a minor change to the policy through the use of 'or', in relation to 1, 2 or 3 bedrooms rather than</p>	<p>Agree with representation and propose the following change to the NP:</p> <p>Pg 72, Policy HO4, Housing Mix – Provision of Smaller Homes, Section 10.47</p>

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
Homes , pg 71.		<p>and would add locally distinctive criteria which build upon Policy CN3 of the Local Plan.</p> <p>The drafting could be clarified however, as currently it states that schemes should be 50% 1,2 and 3 bedroom (which would be 150%), where it no doubt means 50% of the market units should be a mix of 1,2 and 3 bedroom units, and should be amended accordingly if this is considered to be a clearer way of</p>	<p>should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently</p>		'and' which is currently used.	<p><i>“In any new residential development, there should be a varied mix of house types, of which at least 50% of Market Housing must be 1, 2 or 3 bedrooms……”</i></p>

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		expressing the objective of the policy.	and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID:			

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
			41-041- 20140306).			
Policy HO5: Housin- g replac- ement s, extensi- ons, annex- es, garage s and other inciden- tal buildin- gs in the countr	Policy HO5: Housing Replace- ments, Extensio- ns, Residen- tial Garden Land and Annexe- s, pg 74	The policy is for housing replacements, extensions, annexes, garages and other incidental buildings within the countryside providing they meet the appropriate criteria within the policy. The policy needs to be clearer that it is only applicable in the countryside as has been done in Policy HO2. Possible wording could be. 'Where	Paragraph 16 of the NPPF: Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; PPG states: A policy in a neighbourhood plan should be clear and	Improve clarity of the policy wording to make it clear that it is only applicable to planning permission s within the countrysid- e. Add some supporting text explaining where	Partially met. The policy has been amended since Reg 14 and is no longer applicable to just the countryside. The text in para 10.52 of the policy has been amended and is weaker than the previous policy wording, as it refers to 'will likely be permitted in the SPB and countryside'. This does not provide sufficient certainty about how decisions will be made.	Agree with the representation on Policy HO5 and propose the following changes to the NP: Pg 74 Policy HO5, Housing Replacements, Extensions, Residential Garden Land and Annexes, Section 10.52 "The replacement or extension of a 'dwelling' will be supported in the SPB and the countryside provided that:

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yside, pg 73.		<p>the replacement or extension of a dwelling is located outside of the settlement policy boundary it will be permitted where it accords.’.</p> <p>It would also be helpful to define what the countryside is, i.e. in the Local Plan it is any land which is located outside of the designated settlement policy boundary and it is considered that this should be included within the supporting text.</p>	<p>unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the</p>	<p>would be considered a countryside location for the purposes of the policy.</p>	<p>A new set of criteria (10.54 a-f) have been introduced into Policy HO5. It is not quite clear as to precisely what types of development these criteria apply to. The phrase ‘on residential garden land’ could apply to extensions and replacement houses but these are already addressed in criteria (10.52).</p> <p>If these criteria are intended to apply to new houses following the subdivision of a plot, then this should be clarified. In any event, this section (10.54) should include reference to how proposals should have regard to the</p>	<p>Pg 74 Policy HO5 Section 10.54</p> <p>“Development proposals on residential garden land for new houses through the subdivision of a plot will be supported provided that.”</p>

Section/ Policy of the pre-submission plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		The policy also seeks to rely on requirements in policy SS6. If the Plan would be dependent on those requirements then they should be included within the policy in full, as they would not be applicable once the current BDBC Local Plan is replaced with the LPU.	specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).		prevailing plot characteristics in the area.	
Policy HO6: Affordable Housing, pg 74	n/a	The policy seeks affordable housing contributions from development over specific thresholds as per the Housing SPD (2018).	The NPPF (2019) updates the threshold for the size of planning applications that can provide affordable housing. It	It is suggested that the policy is removed as it duplicates Policy CN1.	This policy has been removed from the submission plan.	

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>This policy repeats the current Local Plan policy CN1 and it is questioned whether the policy adds anything specific to the neighbourhood area.</p> <p>Furthermore, the council have recently changed their approach which means it now collects off-site contributions within the AONB for all development. The policy approach is therefore now out of date and the wording should be amended to ensure</p>	<p>requires that affordable housing 'should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of five units or fewer)'. Major development, for housing, is defined as developments of 10 or more homes, or sites</p>	<p>Some supporting text could be retained for reference within the plan but the inclusion of the policy may be unnecessary.</p> <p>However, if the policy is retained it should be amended to reflect</p>		

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>the approach within the Neighbourhood Plan is in line with that of the Local Planning Authority.</p> <p>First Homes are a new type of affordable housing which will be implemented before the Neighbourhood Plan is adopted, in December 2021, and therefore this requirement could be referenced within the policy. If the policy is to be retained it could include reference to at least 25% of first homes being a requirement.</p>	<p>with an area of 0.5ha or more.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), which is a designated rural area, affordable housing (or an equivalent off-site contribution) will be sought on all developments providing net new dwellings (as of June 2021). This is because adopted Local Plan Policy CN1</p>	<p>lower affordable housing thresholds in the AONB and the council's approach since June 2021. It could also include reference to new legislation regarding First Homes which is due to become compulsory from</p>		

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			<p>(Affordable Housing) requires affordable housing on all market sites, and so establishes this threshold in the AONB.</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with</p>	December 2021.		

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			<p>confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID:</p>			

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
			41-041- 20140306).			
Local Employment and Business Policy						
Policy LB1: Supporting local employment and business, pg 77.	Policy LB1: Supporting Local Employment and Business, pg 78.	<p>The policy seeks to support local employment and businesses and supports the local rural economy in re-using existing buildings and supporting new buildings in the countryside.</p> <p>The first part of the policy is complicated and could be helpfully clarified. The process of clarifying this opening part of the policy may also</p>	<p>Paragraph 29 of the NPPF: Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development</p>	<p>The policy needs to be amended in order to ensure that it supports all types of businesses in rural areas and allows for new buildings to support the rural economy, as per paragraph</p>	<p>Partially met.</p> <p>The first part of the policy has been amended and simplified and can now be applied to a wider range of employment uses rather than solely agricultural or small-scale enterprise.</p> <p>A number of criteria have also been removed from the pre-submission draft and this is welcomed.</p>	No response

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>address the points below.</p> <p>It is noted that the policy is seeking to support the rural economy and in a manner which is consistent with the NPPF. However, the policy appears to be more restrictive than is set out in paragraph 83 of the NPPF. In particular it is not considered to be consistent with the NPPF to restrict the scope of the support for the rural economy to <i>“agriculture or small-scale enterprise that meets community or</i></p>	<p>plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.</p> <p>Footnote 16: 16 Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area</p>	83 of the NPPF.		

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p><i>other land based rural business needs</i>". This is because the NPPF specifically states that all types of businesses should be supported.</p> <p>Similarly, the policy also needs to allow for new buildings, not just the conversion or replacement of existing buildings, again, as per paragraph 83 in the NPPF. This is referenced in the first part of the policy but not the criteria, so this may just be an issue of</p>	<p>Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a</p>			

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>clarifying the policy wording.</p> <p>The policy also refers to matters which relate to Policy TT1 including accessibility, rural roads and increased traffic, and this creates some overlap between policies. These issues may be more locally distinctive and relevant in another policy.</p>	<p>neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique</p>			

Section/ Policy of the pre-submission plan (Reg 14)	Section/ Policy of the submission plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
			characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).			
Traffic and Transport Policy						
Policy TT1: The traffic and parking impact of new developo	Policy TT1: The traffic and parking impact of new developo	The policy seeks to limit the impacts of development upon the local transport network. The policy requires all new developments to provide a parking	Paragraph 31 of the NPPF: 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be	The policy could be removed if it is considered that it is duplicating existing policies.	Partially met. The policy has been retained, with some additional detail added to the policy, particularly TT1(a). However, Policy CN9 notes development proposals that generate significant amounts of	Policy TT1 was retained, as the impact of new development on the parish road and parking infrastructure was by far the highest concern raised by the community during consultation.

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
pment, pg 79.	ment, pg 81	<p>statement setting out the approach to parking provision.</p> <p>The policy replicates a number of requirements which are already included within Local Plan Policy CN9 and the parish council should consider whether this policy adds anything locally distinctive and whether it is needed within the neighbourhood plan.</p> <p>If the policy is to be retained, more locally distinctive elements could be added and these</p>	<p>adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'</p> <p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with</p>	<p>If the policy is to be retained, more locally distinctive elements could be added to the policy.</p>	<p>movement must be supported by a Transport Statement or Assessment. It is noted that the requirement in TT1(a) may be too onerous for small scale development i.e. for one dwelling located outside the SPB.</p> <p>TT1(a) could also be interpreted as suggesting that if a significant development came forward within the SPB it would not need to provide an assessment for traffic generation and impact.</p>	

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		could be sourced from the work already undertaken.	confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID:			

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
			41-041- 20140306).			
Appendix A: Village Design Statement						
Appen- dix A: Village Design Statem- ent	n/a	<p>The design principles in the appendix are not the same as those in the 2005 Village Design Statement and some appear to have been updated. This creates confusion over the relationship between the design principles and the Village Design Statement.</p> <p>If the appendix is to be used, which includes a wider description than that</p>	<p>PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported</p>	<p>Provide some clarity within the Policy and supporting text regarding how the Village Design Statement and Appendix A should be used.</p>	<p>This has now been removed and no longer forms an appendix to the NP.</p> <p>There is now reference in Policy HO1(A) to the Village Design Statement which is much clearer.</p>	

Section/ Policy of the pre- submis- sion plan (Reg 14)	Section/ Policy of the submiss- ion plan (Reg 16)	BDBC comments in response to policy	Relevant National Guidance (NPPF and PPG)	Potential options/ actions	Not met/ partially met/ comment at Regulation 16 (submission plan)	EWPC Response to Reg 16 Representation
		<p>which is included within the VDS, some supporting text should be added explaining that it has been revised and consulted upon through the regulation 14 consultation, and that this supersedes the previously adopted VDS.</p>	<p>by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).</p>			

Annex A: Minor Changes suggested

Minor changes suggested to Neighbourhood Plan		Met?	EWPC Response to Regulation 16 Representation
Glossary of abbreviations and terms, pg 2-5.	Many abbreviations are missing and could be inputted for instance Local Development Scheme is commonly abbreviated to LDS and Authority Monitoring Report to AMR.	Met. The following changes are suggested for clarity. Conservation Area <i>An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated <u>heritage asset</u> as such pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990.</i> Listed Building <i>A <u>structure or building</u> which is <u>a designated heritage asset</u> included in the statutory list of buildings of special architectural <u>and/or</u> historic interest</i>	No response
Basic conditions, pg 11	The basic conditions need to be updated.	Met	
General comment: Emphasising policy boxes	A border around the edge of the policy box would be helpful to demarcate between policies, this is particularly relevant on page 24/25 where the policy boxes merge for Policy RC1 and RC2.	Met	
General comment on: Policies	There is no need for policies to have paragraph numbers, this can be	n/a given the changes detailed above.	

	confusing at times to differentiate between what is supporting text and what is policy wording.		
General comment: Maps	The quality of maps throughout the document could be improved and clarity enhanced, for example on Map 2 it is not clear which area of the Parish is not within the AONB.	Met	
Policy HO1: Good Design Quality	In criteria (b) of Policy HO1, it should say 'complementary' with an 'e' rather than 'complimentary'.	n/a – this is a new comment.	
Policy HO5: Housing replacements, extensions, residential garden land and annexes	Criteria (b) of Policy HO5 talks about replacement houses being "sympathetic to the appearance and character of the existing dwelling". Perhaps this should be reworded as a replacement house need not be sympathetic to the appearance of the existing dwelling: rather there should be an emphasis on being sympathetic to the character of the surrounding area.	n/a – this is a new comment.	
Policy RC2: Dark Skies	Generally, the policy is supported. However, the policy requests that a 'lighting scheme' is submitted with all applications involving external lighting. However, it is not clear what a lighting scheme would entail, which makes the policy difficult to implement. Therefore, it is recommended that some clarification	This policy is now called Policy NE3: Dark Skies. Met. Development proposals are now required to meet the guidance within the 2021 publication of 'Dark Skies of the North Wessex Downs – A Guide to Good External Lighting'.	

	<p>be incorporated into the supporting text.</p> <p>There appears to be some duplication between criterion d) and paragraph number 7.13 within the policy which both refer to glare and spillage being kept to a minimum.</p> <p>Provide greater clarity in terms of what a 'lighting scheme' would entail, in terms of what information would need to be provided with relevant planning applications.</p>		
Policy NE1: Protecting the landscape	In relation to paragraph 8.11 within the policy it may be helpful to include in the supporting text which native species are found locally. The Local Planning Authority have recently published a Landscape Character Assessment (May 2021) which will be relevant to the evidence base of the neighbourhood plan.	Met. The policy now includes reference to Oak and Beech trees.	
Paragraph 9.16	This section is called 'built heritage assets' it is suggested this section is amended to name 'heritage assets'. It is suggested that the first line of the paragraph is amended for accuracy, some suggested wording has been provided below:	n/a – this is a new comment.	

	<p>'Heritage Assets are non-renewable resources that are intrinsic to character and sense of place. As well as buildings within the Conservation Areas and Scheduled Monuments, there are two further types of Built <u>other Designated Heritage Assets are: Listed Buildings and Historic Parks and Gardens.</u> <u>Non-designated heritage assets can be identified during the course of a planning application and this includes archaeology, other non-designated heritage assets include 'The Local List' and Notable Structures within the conservation areas.</u></p>		
<p>Policy CF1: Community Facilities</p>	<p>It is suggested that the significant of heritage assets is included within the policy and some suggested wording has been provided below:</p> <p>'Proposals to extend or improve the viability of a community facility by way of an extension, partial replacement or redevelopment of buildings, structures and land, will be supported. This is provided the design of the scheme respects heritage features, the street scene and the resulting increase in use and will not have a negative impact on the <u>significance of heritage assets</u></p>	<p>n/a – this is a new comment.</p>	

	<i>and the</i> amenities of adjoining residential properties.’		
Policy CF2: Recreation	<p>The wording ‘from time to time’ (as per paragraph 9.14) is not precise and it is suggested this is amended to ‘or subsequent versions’.</p> <p>The supporting text could also make more reference to the Green Infrastructure Strategy and how play provision has been identified as low in the parish. This would also explain why this policy requirement is important locally.</p>	Met.	
Policy LB1: Supporting Local Employment and Business	It may be helpful to review the formatting of Policy LB1 as it appears that the first paragraph could benefit from some paragraph spacing.	Met.	
Policy NE4: Trees and hedgerows	It may be helpful to review the formatting of Policy NE4 as it appears that the paragraph could benefit from some paragraph spacing or bullet points.	Met.	
Para 10.8	It could be stated that, if there are any pubs or shops: “The variety of services and businesses present in the conservation area, interspersed with houses, contribute to aspects of the character of the conservation area such as vitality and vibrancy,	Not met.	Reponse, no change to the NP as there are no pubs or shops in the highlighted conservation area.

	and reflect the historic function of the settlement”.		
Appendix 1, Village Design Statement	The two hyperlinks included within the appendix of the document don't work.	n/a.	