

HDC response to West Chiltington Pre-Submission Neighbourhood Development Plan (WCNPD)

21/09/2021

Ref	Comment	HDC Recommendation to WestChiltington Parish Council	NP Team comment
Consultation Statement			
Consultation Statement	The publication of the Consultation Statement alongside this consultation may cause some confusion for members of the public. We understand that the statement is historic and references what has been done, however, it does not reflect this plan as the plan is still at the first round of consultation.	Revise consultation statement to reflect the current WCNDP and make it clear what was done before and what has been done for this iteration of the plan.	Done
Basic Conditions Statement			

Basic Conditions Statement	<p>We believe that the BCS to be in line with the regulations and to cover all necessary requirements. We also note the health check by AECOM -https://2c296a45-e1f4-4136-bbcb-b253b2ed025e.filesusr.com/ugd/fc02af_fcf13176996d48379cd6422e9659b600.pdfAs per the health check, it mentions the update to the HRA regulations -https://www.legislation.gov.uk/ukxi/2018/1307/contents/made</p> <p>Please note that the Neighbourhood Area was designated by SDNPA on 17 February 2014 (not 24th).</p>	N/A	
Habitats Regulations Assessments (HRA)			
HRA	<p>There is a HRA that accompanies the evidence base of the WCNDP. The purpose of the HRA is to identify if any of the policies or allocations, could have detrimental harm on the integrity of any European Designated Sites. These sites are identified under paragraph 3.2, table 1 of the HRA report. The HRA goes on to detail the current threats to each designated site.</p>	N/A	

	<p>Table 4, starting page 23, goes through the WCNDP policies and comments on the level of impact on international designations for nature conservation. Policy H2: Allocation of land for Housing, notes that the sites are too small (less than 2Ha) to be functionally linked to the Arun Valley SPA. However, it is suggested that any greenfield development in this part of the Horsham District, could have adverse impacts on water bodies, for example the water bodies of the Mens SAC and Ebernoe Common SAC. This is because there is the potential to cause changes in water levels due to increase in demand for water abstraction.</p> <p>In the concluding remarks of the report, paragraph 7.6, it notes additional text that should be added to policies; H2, EH4, EH12, EE5 and EE6.</p>		
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Strategic Environmental Assessment (SEA)

SEA	<p>There is an SEA by Aecom that accompanies the evidence base of the WCNDP. The purpose of the SEA is to appraise the sustainability of the policies in the WCNDP. This is a process required by the SEA Regulations, and the NDP group will use the SEA to assess NDP against a set of sustainability objectives. The SEA can help avoid adverse environmental and socio-economic effects through the NDP.</p> <p>Potential sites options were considered through the SEA. A total of 40 sites (paragraph 4.11 of the report), were considered. Out of these 40, five came through the local call for sites, 10 through the HDC SHEILA¹ (2016 and 2018 versions) and 25 sites identified by the WCNDP Steering Group.</p> <p>From reading the SEA report and the documents on the Site Assessment and Housing process (available on the evidence base tab of the parish council website), it is our impression that a suitable and appropriate housing assessment was carried out that helped inform the allocated sites in the draft WCNDP.</p>	N/A	
General Neighbourhood Development Plan			

¹ SHEILA – Strategic Housing and Economic Land Availability Assessments

Policy map	We would like to see an inclusion of a policies map that shows all of the policies. In the comments below, we ask for some policies to be shown on a map. They should also be included in the over-arching Policies map.	Creation and inclusion of an overarching Policies map.	Done
General comments	We welcome the clear effort and time that has gone into the preparation of this plan.	N/A	
General comments	The WCNDP is currently titled as 'West Chiltington Submission Neighbourhood Plan.' As this is a draft Regulation 14 consultation, it should read pre-submission. Regulation 16 is the Submission document.	N/A	
General comments	We would like clarity on the plan period (further explained in Section 2.1.2 below.) It was our understanding, that this NDP has been prepared taking into consideration the Horsham Local Plan Review. However, this is not reflected in the plan itself.	Clarification required on the plan period, and for this to be specifically noted in the plan itself.	Done
General comments	We would suggest that the content page of the NDP references the individual policies and their page numbers.	Add all policies and page numbers to content page.	Done
General comments	We would suggest that the use of paragraph numbers is utilised throughout the plan, so it is easier to reference.	Paragraph number all paragraphs	Done
General comments	Keep a consistent approach to uppercase within policy names.	For clarity and consistence	Done

Section 1 – Introduction			
Section 1, bullet point 1	We suggest adding in the relevant date reference to the NPPF (July 2021) under the ‘How the Neighbourhood Plan fits into the Planning system’ bullet points. This should also be added to paragraph 2.1.1 in Section 2.	Amend text to include reference to the most up to date NPPF (July 2021).	Done
Section 1.2, Plan Preparation Process	<p>It is good to show this process in the plan, however these steps must also be included in the accompanying Consultation Statement, which should be submitted at Reg 16 stage. The inclusion on the website could be a little confusing, as this consultation statement was submitted for another iteration of the WCNDP, and not this current document.</p> <p>The plan also states: “The Neighbourhood Plan has already been through two pre-submission consultations.” The plan must be clearer with this as it could be</p>	<p>Be sure to include all of Section 1.2 in the Consultation Statement at Regulation 16 stage.</p> <p>The plan should add in text that clarifies what iterations of the WCNDP are being discussed for clarification and to avoid confusion.</p>	Done

	<p>misleading. As previously stated, this is a different plan on the first pre-submission. This may be the third Regulation 14 consultation for the steering group, but each Regulation 14 plan was a different iteration.</p> <p>In a similar vein, the eighth bullet on page 6 refers to “the Submission Plan” which again may require clarification and addition text as it was a previous version of the WCNDP. This plan must be clearer when addressing older drafted versions.</p>		
Section 1.5 – Map	The map should make reference to the South Downs National Park (SDNP) boundary.	Add the SDNP to the map legend	Done
Section 2 – Policy Context			
Section 2.1.1	The last paragraph needs to be rephrased. It should say that “...must be in general conformity with the development plan and respect the integrity of the nationally important environmental sites.”	Consider re-phrasing of the final paragraph for clarity.	Done

<p>Section 2.1.2</p>	<p>The opening paragraph of this section is a little confusing, and could have some added context for clarity (as mentioned above). It was the impression of HDC that the West Chiltington Neighbourhood Development Plan (WCNDP) has been prepared taking into consideration the Horsham Local Plan Review. However, this is not reflected in the plan itself. The current plan period covers 10 years; 2021-2031 which is the end date of the current adopted Horsham District Planning Framework (HDPF). The adopted HDPF does not set a housing figure for West Chiltington.</p> <p>We do note the final sentence on page 8 that states; “Any review that is necessary will begin within twelve months of the adoption of the Local Plan.” It is our opinion that a review will be necessary, regardless if any updates are needed. It may be that the plan is deemed in general conformity and not needing update. But we would guide all Neighbourhood Plan groups to carry out the exercise. We also think this should be as soon as possible once the Horsham Local Plan review is adopted, not 12 months as stated.</p>	<p>Clarity on the plan period of the WCNDP. Additional text for clarity on the name/title of the Horsham Local Plan Review.</p> <p>We would urge the Steering Group to think more about reviewing the WCNDP soon after the Horsham Local Plan has been adopted.</p>	<p>Amended to reflect the HDC LP review</p>
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Section 3.4	The first sentence at the bottom of page 13 refers to AONB and National Parks being of 'international importance'. This should be changed to 'National importance.' We would also welcome the inclusion of the SSSI name on top of page 14. Police station – Southwater (end page 19)		Done
Section 3.8	The bottom of page 19 refers to the police station in Horsham, which is not incorrect. However, there is a closer police station in Southwater that could be included here.	Include the reference to Southwater Police Station here.	Done
Section 5 – Neighbourhood Plan Policies			
Section 5b	This section is not necessary in the plan and could be deleted.	Delete	Deleted
Section 5c	You do not need to replicate policies in the adopted Development Plan.	N/A	Noted
Section 6 – Housing Policies			

<p>Policy H1 – Spatial Strategy and Built Up Area Boundaries</p>	<p>Support this policy in principle, but we have a few comments to make.</p> <p>We do note the inclusion of some of the large gardens within the Built Up Area Boundary. This is particularly in the area that follows Monkmeade Lane to the west. We would suggest the Steering Group re-looking at this area and possibly not including the entirety of some of the gardens.</p> <p>Point a can be deleted – not necessary.</p> <p>Point c refers to the settlement zone/local gap between West Chiltington old village and West Chiltington Common which is shown on Map B. It would be interesting to understand the threat of development within this area. It may also be worthwhile for the Steering Group to think about whether a standalone Gap policy could be added into the Plan.</p> <p>Point d is in accordance with the HDPF, but is repetition so can be deleted. Point e is too broad, possibly move to supporting text as it does not add value.</p>	<p>Explain the justification for the settlement gap between West Chiltington Village and Common through evidence. Also include a standalone map of the settlement gap. Relook at the BUA, in particular some of the areas near Monkmeade Lane.</p> <p>Deletion of some criterion may be necessary to avoid repetition or uncertainty.</p>	<p>Appendix 9 detail the reasons for the gap. The settlement boundary mirrors the HDC one.</p>
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	<p>Point f refers to the enhancement of local flora and fauna. We are in support of this point, however it could be useful to link to a document, or suggest what these are and how the Steering Group would like to see them protected/enhanced. As a baseline, biodiversity net gain is within the NPPF, so should also be referred to here.</p> <p>Point g is very broad and may be hard to implement.</p> <p>Point h, again we are in support of this but it could be useful to show these important trees and hedgerows on a map. As we agree they can form important landscape features.</p> <p>Point I is referred to in the HRA and is welcomed.</p>	<p>Provide clarification on the flora and fauna (biodiversity) within the Neighbourhood Area.</p> <p>To include a map that shows the important trees and hedgerows, for clarity.</p>	<p>Plan amended</p>
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<p>Policy H2 – Allocation of land for housing</p>	<p>This plan has been prepared in line with the HDPF. The HDPF did not allocate/agree to give West Chiltonton a housing number.</p> <p>The wording needs to be corrected to 'Horsham District Local Plan' to HDPF for clarity. We would also suggest that the opening statement in the first sentence should be changed to; "The West Chilts Neighbourhood Plan allocates...", instead of "Permission will be granted..." This denotes positive planning which the NPPF strongly advocates.</p> <p>It also refers to the West Chiltonton Design Guide, is this the same reference as Policy H3? Should add in the date of the Design Guide – 2018.</p> <p>H1 and H2 seem to copy one another. Is H2 about specifically the new sites only? There seems to be a repetition in the housing policies that is commented on throughout.</p> <p>As a high-level comment, it could be worthwhile having the housing allocations themselves as two separate policies. Then add the policy wording from Policy H2 into these policies.</p>	<p>Update references where necessary and update the wording for the HDPF.</p> <p>Add in the date of the quoted Design Guide.</p> <p>Include the two housing site allocations as separate policies. This will provide clarity especially if the policy was quoted by a case officers in a report or an appeal. At the moment the distinction is not clear.</p>	<p>Done</p> <p>Done</p> <p>Done</p>
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	<p>Point 1. may require a footnote or reference to the later paragraph 2.3 that explains this requirement further. We would also suggest writing the full word the first time it is noted to avoid confusion. Further clarification on HQM, HQM or equivalent/lifetime homes standards.</p> <p>We agree in principle with point 2. Please explain the reference, we would be interested if these were cited from anywhere in particular?</p> <p>We agree and support point 4, 5, 6 and 9.</p> <p>Point 7 may not always be applicable, as artificial screening can occasionally change the openness of the landscape. The policy could add the following text: “...should be screened by hedgerows and tree planting <u>where applicable</u>, to soften their appearance...”</p> <p>Point 8 the bullet points and letters and inconsistent. In some cases bullet points are used, and others they are letters. Also the third bullet point refers to ‘2m minimum width.’ Where is this quoted from?</p> <p>Point 9 may not be needed, as it is repetition of HDPF Policy 16: Meeting Local Housing Needs 3a and is covered by the NPPF. Point 10 is in keeping with the Local Plan and supported by HDC.</p> <p>Point 11 - we do recognise that areas of the district do have an aging local population and therefore the housing requirements are changing. The current HDPF Policy 18: Retirement and Specialist Care</p>	<p>Include a footnote or link to paragraph 2.3 for clarity.</p> <p>The Steering Group should consider revising the policy wording of point 7, to add context and policy compliant.</p> <p>Consider deletion of point 9 of policy as it is a repetition of the HDPF and National Policy.</p> <p>Consider revising this part of the policy, as seeking older persons accommodation on top of the 35% affordable</p>	<p>Plan amended</p>
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	<p>undertook a more recent HNA/S as the previous HNS is 7 years old and may require updating.</p> <p>We do note Policy H4 that suggests the Lifetime Home Standards. We would suggest Policy H4 wording being included within Policy H2.</p> <p>Point 12 refers to the Design Guide, but we are unsure again if this is the 2018 version cited later.</p> <p>We note the inclusion of point 13 that was put forward in the conclusion of the HRA (paragraph 7.6 of the HRA). We welcome that the Steering group has included this recommendation within the policy.</p> <p>A general comment about the site allocations. There are very few site specific requirements in each policy. The two site requirements are fairly similar in nature, it may be worthwhile to revisit these and add/expand upon site specifics to add more local context to the policies. This should be seen as an opportunity for the Steering group to include aspects that will enhance the sites.</p> <p>In principle we are content with the site selection process that has taken place to include these sites in the WCNDP.</p> <p>For both site-specific parts of the policy, point (a) refers to “no more than 1.3ha”. This should have some flexibility to help the site come forward, and should be deleted. Secondly, in the start of both site-specific parts, what is meant by the term ‘mixed development’ in the opening statement.</p>	<p>As above.</p> <p>Consider add in more site specific requirements to the site allocation portion of this policy. Take the opportunity to identify key areas of threat (mitigation measures) and opportunities.</p> <p>As above.</p> <p>Delete references to the maximum site size.</p>	<p>Plan amended</p>
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	<p>that could refer to the tenure of these homes, along with the addition of Built for Life/Lifetime homes building standards.</p> <p>Site 1, point g what is meant by this? Is there difficulty with access or a ransom strip? We are unsure for the need of this criteria.</p> <p>Should that final paragraph be reflected as a policy criterion? As it reads that way.</p> <p>It also refers to the HDC Landscape Character Assessment 2003, which has since been updated in the Local Plan review.</p> <p>Can link to new evidence base. Also, consider rewording 'reflect' to 'sympathetic.'</p> <p>A third general point would be to include a map of each of the sites within the Policy text itself.</p> <p>All car parking on new residential developments must be in accordance with the West Sussex County Council (WSCC) Guidance on Parking - https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf</p> <p>A small comment, on site 2 the term 'pepper potting' – or define in glossary, is used to describe how visitor parking will be dispersed around the development. The Steering Group may wish to use another term here for clarity.</p>	<p>Include final paragraph as policy criteria.</p> <p>Update the HDC Landscape Character Assessment to the newer version.</p> <p>Consider changing the wording of parts of the policy.</p> <p>Include a map of the housing allocation sites.</p> <p>Include reference to the WSCC Parking Standards as a hyperlink or footnote.</p> <p>Consider re-phrasing of the term pepperpotting in Site 2 of the policy.</p>	<p>The Landscape Character Assessment is the most recent shown on the HDC website at https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</p> <p>Map amended</p> <p>Done</p> <p>Done</p>
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<p>Policy H3 – Quality of Design</p>	<p>We are in support of this policy in principle, however, certain areas of the policy overlap with Policy H2. The Steering Group could consider a policy for New Housing Development, which includes Policy H3, H4 and H5.</p> <p>As a general comment, the HRA does note that none of the current drafted Housing Policies will have a significant effect on the International Sites and were screened out during the HRA process.</p> <p>The first two paragraphs should be split up into Part A and B. Part B will include the points a-f as well.</p>	<p>We think it could be worthwhile for the Steering Group to merge several of the housing policies together; H3, H4, H5 and H8.</p>	<p>Plan amended</p>
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	<p>Part a not feasible and should be deleted. Part b is repetition and should be deleted.</p> <p>Part d 'add where possible' at the end of the criteria.</p> <p>Part f is not covered by planning and should consider deletion. This may be something covered by planning conditions at the application stage.</p>	<p>Consider splitting the policy into two different sections.</p> <p>Consider deletion of certain criteria.</p>	Plan amended
Policy H4 – Housing Mix	<p>We support this policy in principle, however, the text of the policy, and the policy itself, may be better included within another housing policy.</p> <p>There is also slight repetition here of what is in other housing policies.</p>	As above.	Plan amended
Policy H5 – Housing density	<p>We support this policy in principle, however as previously mentioned it could be incorporated into another policy. It may also be useful to add some further commentary to what the Steering Group would see as 'overloading' local services and infrastructure. Are there any specific areas that are of concern, and is there any evidence from WSCC Highways.</p> <p>Consider deletion of "...including topography and not overloading local services/infrastructures."</p>	As above. Secondly for the Steering Group to add in further commentary about what sections of the Neighbourhood Area are at threat from overloading local services and infrastructure.	Plan amended

<p>Policy H6 – Affordable Housing</p>	<p>As previously mentioned, this policy could be incorporated into another housing policy. Affordable housing is addressed at a Strategic Level in the HDPF and NPPF. This policy could be deleted as repetition or incorporated into a larger housing policy on new development. Could include First Homes as mentioned in Policy H2.</p> <p>We do appreciate that affordable housing is important at a local and strategic level so can understand the inclusion within the NDP.</p>	<p>Consider deletion of policy as this is repetition of the HDPF and National Policy. Or incorporate into a wider housing policy.</p>	<p>Plan amended</p>
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<p>Policy H7 – Windfall Sites</p>	<p>We support this policy in principle, however point g is in conflict with the opening statement of the policy. Affordable housing cannot be sought on sites under 10 dwellings. The opening of this policy notes that windfall is only for small sites of 5 or fewer dwellings. We would suggest that either the site size of the policy is increased so affordable housing can be included, or delete part g of the policy.</p> <p>Part a should say ‘Development plan’ not neighbourhood plan.</p> <p>Part b; the criteria regarding ‘open character’ could be confusing due to nature of infill.</p> <p>Part c should say ‘sympathetic of amenities of adjoining properties’ instead of ‘avoids harming unacceptably the amenities of adjoining residential properties.’</p> <p>Final paragraph should be an extra criteria.</p>	<p>The Steering Group needs to consider the wording of the policy. Consider increase of the dwellings cap or delete part g of the policy.</p> <p>Consider re-wording of some of the criteria.</p> <p>Consider making final paragraph a criterion.</p>	<p>Plan amended</p>
<p>Policy H8 – Recreational Space</p>	<p>We support the need for recreational space within new developments. As previously mentioned, this could be included in a larger new development policy. The policy also covers more than recreational space, as it covers green space too.</p>	<p>Consider renaming the policy to include green space, as the policy covers more than recreation. Or, as above, consider merging this with other housing policies.</p>	<p>Plan amended</p>
<p>Section 7 – Environment and Heritage Policies</p>			

<p>Policy EH1 – Green Infrastructu re and Ecosystem Services</p>	<p>We are in general support of this policy. The group may wish to include links to habitats, biodiversity and flora and fauna. The use of multi-functional spaces within the Neighbourhood Area.</p> <p>In the second part of the policy, it notes “...to avoid any significant harm to the designation.” We would suggest changing the word ‘designation’ as the word has a specific meaning.</p> <p>Second section reads a little too technical and not a policy. Possibly delete the last sentence, and should reference Biodiversity Net Gain.</p>	<p>Add links to habitats and biodiversity to cover multi-functional areas.</p> <p>Consider re-phrasing of the word designation.</p> <p>Make reference to Biodiversity Net Gain.</p>	<p>Plan amended</p>
<p>Policy EH2 – Surface Water Managemen t</p>	<p>We recommend deletion of first paragraph of Policy as this is repetition of National Policy. We should also reference that Surface Water flooding and Management is different to Flood Risk 2/3.</p>	<p>Delete first section.</p>	<p>Plan amended</p>

<p>Policy EH3 – Protection of trees and hedgerows</p>	<p>We understand the importance of trees and hedgerows for local character, buffers, amenity and landscape. We would suggest making the difference known between a Tree Preservation Order (TPO) tree and an unprotected tree. Changes to a TPO tree is something that would be dealt with through the Trees team at HDC.</p>	<p>Include the distinction between TPO trees and unprotected trees to avoid any confusion.</p>	<p>Plan amended</p>
<p>Policy EH4 – Renewable and Low Carbon Energy</p>	<p>We are in general support of this policy. We note that the Steering Group has included the wording put forward in the HRA (point d of the policy). Policies on renewable energy are in conformity with HDC’s view on tackling climate change and HDPF Policy 35: Climate Change.</p> <p>Should include materials in criteria b. Add lighting to criteria c.</p> <p>Consider deletion of final part of policy due to being repetition of the agricultural policy.</p>	<p>Add further wording to some criteria.</p> <p>Consider deletion of final part of policy.</p>	<p>Happy with the policy as is</p>

<p>Policy EH5 - Non-designated heritage assets</p>	<p>We would suggest the possibility to merging Policy EH5 and EH6 together. We would ask that the Steering Group checks the work on the Historic England website - https://historicengland.org.uk/advice/hpg/has/locallylistedhas/ to make sure the sites chosen have the correct criteria.</p> <p>Mark on a policy map for clarity and to reference.</p>	<p>Consider merging two of the policies to create an overarching historic built environment policy. Please check all assets against the Historic England advice checklist.</p> <p>Add onto policy map for clarity.</p>	<p>Done</p>
<p>Policy EH6 – Conserve and Enhance the Heritage Environment</p>	<p>This policy could be reworded to ‘Conserve and Enhance the Historical Built Environment’. We are in general support of this policy, however, this policy does not add any value. The listed criteria are already protected under statute. The Steering Group may consider deletion.</p>	<p>Consider deletion of this policy as it is repetition.</p>	<p>Plan amended</p>
<p>Policy EH7 – ‘Unlit village’ status</p>	<p>There needs to be addition of the word ‘policy’ in front of EH7 to be in conformity with the policies beforehand. It would be useful if the ‘unlit areas’ of the parish could be visually shown on a map alongside the policy. Is it the Steering Group’s</p>	<p>We seek clarity on what part of the Neighbourhood Area is covered by the SDNPA TAN. As the SDNPA is a different planning</p>	<p>As stated most of the parish is unlit and given its visibility from the SDNP the policy is important.</p>

	<p>intention for the whole of the Neighbourhood Area, even those outside of the SDNP, to be in line with the SDNPA Technical Advice Note (TAN)?</p> <p>As the South Downs National Park Authority (SDNPA) is a different planning area, is it appropriate to use the TAN throughout the whole Neighbourhood Area?</p> <p>Also, it is not obvious which TAN is being referred to here, the whole nameshould be used for clarity.</p> <p>We think that the first sentence should be retained, however, is the rest of the policy appropriate and being tested? It is not that flexibly worded.</p> <p>Lastly, the name of the policy itself refers to just the village, instead of the whole parish which the Steering Group may wish to consider.</p>	<p>Authority, it may not be totally applicable or relevant for the whole parish. We understand that the group is keen to preserve the unlit nature of areas of the village, so we ask further work is done to understand where these areas are.</p> <p>State which TAN is being referred to for clarity.</p>	<p>The policy has been accepted by Examiners n other parishes with similar dark night skies.</p> <p>The policy name has been changed</p>
<p>Policy EH8 – Wells House</p>	<p>There needs to be addition of the word ‘policy’ in front of EH8 to be in conformity with the policies beforehand. We are in support of this policy, however, we suggest that it may be included in a wider Historic Built Environment policy.</p>	<p>Add in the word ‘policy’ before the policy number, to be in line with the rest of the WCNDP.</p>	<p>Policy removed and amalgamated with EH6</p>

It would be good to know if the current occupants of these homes have been consulted before this policy was included. There needs to be consideration of how the planning aspect of this policy fits into the ownership of these homes. We understand that these are of historic and local importance to the Steering Group, but the policy may need to be rethought and revised as necessary.

This should again be shown on the policies map.

Show the location of the Wells House on the policies map.

Shown on map.

<p>Policy EH9 – Sunken Lanes and Stream Lane</p>	<p>There needs to be addition of the word ‘policy’ in front of EH9 to be in conformity with the policies beforehand. We are generally supportive of the locally important sunken and stream lanes. We would suggest that these are shown on a map for clarity. We would also suggest the consideration of highways on sunken lanes, for example if access to a new site was sought through a sunken lane.</p>	<p>Add in the word ‘policy’ before the policy number, to be in line with the rest of the WCNDP. We suggest the addition of a map to show the sunken and stream lanes. We further suggest further criteria is added to suggest how the integrity of the sunken/stream lanes is at risk.</p>	<p>Done and Appendix 7 explains the reasons</p>
<p>Policy EH10 – Landscape character and important views</p>	<p>There needs to be addition of the word ‘policy’ in front of EH10 to be in conformity with the policies beforehand. We are in general support of this policy and the evidence used.</p>	<p>Add in the word ‘policy’ before the policy number, to be in line with the rest of the WCNDP.</p>	<p>Done</p>

<p>Policy EH11 – Sub-division of Agricultural Land</p>	<p>There needs to be addition of the word ‘policy’ in front of EH11 to be in conformity with the policies beforehand. This policy may not be something that can be covered by a Neighbourhood Plan. We would suggest consultation with Land Registry at HDC.</p> <p>The policy comments on 0.4HA, where is this cited from? Consider adding in thereference as a footnote.</p> <p>However, overall, this policy does cover aspects that cannot be controlled through policies or ourselves as planners so may be hard to implement. This policymay be better deleted and some of the relevant text added into the policy text.</p>	<p>Add in the word ‘policy’ before the policynumber, to be in line with the rest of theWCNDP.</p> <p>Consider deletion as HDC do not think this can be covered by NDP policy.</p>	<p>Done</p> <p>Justification is in the policy text.</p>
<p>Policy EH12 – Development on Agricultural Land</p>	<p>There needs to be addition of the word ‘policy’ in front of EH12 to be inconformity with the policies beforehand.</p> <p>The Steering Group may wish to consider farm diversification for inclusion in thispolicy, for tourism cases for example.</p> <p>Delete from “...Map produced....” Or move policy text EH12.1.</p> <p>Delete criteria c.</p>	<p>Add in the word ‘policy’ before the policynumber, to be in line with the rest of theWCNDP. If the Steering Group decides to keep the above policy, consider merging EH11 and EH12 together for an overarching Agricultural land policy.</p>	<p>Policies merged</p>

Section 8 – Getting Around Policies			
<p>Policy GA1 – Promoting sustainable movement</p>	<p>We are generally supportive of this policy, and its inclusion in the WCNDP. The policy is in general conformity with Policy 39: Infrastructure Provision. A small comment would be in regards to the opening comment of point b; “they are located in places accessible to public.” It would be useful if the Steering Group could give a general indication to where these areas are.</p>	<p>We seek clarity on what “places accessible to the public” means and where they are located in the Neighbourhood Area.</p>	<p>Plan amended</p>
<p>Policy GA2 – Footpath, bridleway and cycle path network</p>	<p>We are generally supportive of this policy.</p>	<p>N/A</p>	
<p>Policy GA3 – Parking and new development</p>	<p>This policy may be better under the housing section of the NDP. We do see that the current drafted policy does note the WSCC standards, which we welcome.</p> <p>The second sentence of policy should be added as policy criteria.</p> <p>Part a of the policy, is this from the WSCC standards and/or building standards?</p>	<p>Add certain sections as policy criteria. Clarity on part a of the policy.</p>	<p>Policy accepted by Examiners of other plans so leave as is.</p>
Section 9 – Employment and Enterprise Policies			

<p>Policy EE1 – Supporting Existing Employment and Retail</p>	<p>We are generally in support of this policy. However, there may be further policy requirements that could be added into the policy. For example, impact on habitats and flora/fauna, local character and landscape and the design of any further development.</p> <p>Policy should say ‘Adjacent properties’ not surrounding.</p>	<p>Consider adding in further context; impact on flora/fauna, biodiversity, local character.</p> <p>Consider rewording small areas of the policy.</p>	<p>Plan amended</p>
<p>Policy EE2 – Retention of employment land</p>	<p>We support and understand that local enterprise and employment are important to the WCNDP. We are generally in support of this policy and criteria.</p> <p>There is some confusion to; “...(with the exception of land identified in Policy H2)...” what this means?</p>	<p>N/A</p> <p>We ask for some clarity on this statement in the policy.</p>	<p>Plan amended</p>

	<p>We would also not advise trying to limit the type of use class so harshly; “change of use to Class B2 uses (general industry) or Class B8 (distribution and storage) will not generally be supported due to the heavy traffic that such uses can generate.” HDC cannot pre-empt the advice of WSCC Highways department. We have no grounds to refuse development if it could be acceptable.</p> <p>Consider splitting each paragraph into A, B and C.</p>	<p>We would ask that the Steering Group reconsiders the wording of the second paragraph of the policy.</p>	<p>The policy states ‘will generally be resisted’ which is fact</p>
<p>Policy EE3 – Local shopping facilities</p>	<p>We are in support of this policy.</p>	<p>N/A</p>	
<p>Policy EE4 – Improving signage</p>	<p>We are in support of this policy, however there may be times where updating signage is allowed under permitted development and will not need to take account of the NDP .</p>	<p>N/A</p>	
<p>Policy EE5 – Sustainable Recreational and Tourism activities</p>	<p>We are in support of this policy, however the Steering Group may want to consider the addition of farm diversification to the policy criteria. This has been previously mentioned in the agricultural policies above.</p> <p>Make last sentence a separate paragraph.</p>	<p>Consider adding farm diversification into the policy.</p>	<p>Done</p>

<p>Policy EE6 – Rural Buildings</p>	<p>We support this policy in principle, but believe it has some overlap with other policies and could be streamlined. We support the criteria of this policy.</p> <p>Second paragraph, 'or to residential uses' should be deleted.</p> <p>Make first section Part A and second Part B. Second section reads like statement and it repetition of Agricultural and Tourism policies. We would ask that the Steering Group tighten up the definition of residential, for example for existing business and agricultural dwellings only.</p>	<p>Consider merging this policy with another to streamline plan.</p> <p>Consider deletion of second part of policy.</p> <p>Tighten up the definition and use of residential in this policy.</p>	<p>Done</p>
<p>Policy EE7 – Communications infrastructure</p>	<p>We support this policy in principle, however certain aspects of this policy is outside of the control of a Neighbourhood Plan.</p>	<p>N/A</p>	

Section 10 – Leisure and Community Policies			
Policy LC1 – Support independent living	We support this policy in principle. Give full definition of 'Built up area boundary' to avoid confusion.	N/A	
Policy LC2 – Healthcare facilities	There may be some instances where the provision of healthcare facilities outside of the BUA is appropriate especially with the uplift of the housing figure in the Local Plan Review. There are some instances where healthclinics may come forward as a part of a larger development.	N/A	
Policy LC3 – Provision of buildings for community use	We support this policy in principle, however there may need to be further criteria added to the policy, for example, the impact on the local infrastructure and highway network. Policy LC3 and LC4 could be combined into one policy, for example 'Provision and Protection of buildings for community use.'	Consider adding further criteria to the policy, especially to do with local infrastructure. The Steering group could consider combining PolicyLC3 and LC4.	Done
Policy LC4 – Protection of assetsof community value	We support this policy in principle, however, it could be useful to note what 'areasonable price' would be in the eyes of the WCNDP. Could be deleted, dealt with outside of NDP legislation.Need to consider register on the policies map. What does 'PHDone' mean after point 4.	Addition of text that explains what 'a reasonable price' is for clarity. Considerremoval.	Amended

<p>Policy LC5 – Designation of Local Green Spaces</p>	<p>We support this policy in principle. However, we note that the LGS to the south, within the SDNP, is also an SSSI. The protection of the SSSI is of National Importance and does not require the additional layer of a local green space. It could also be useful to label and name the LGS on the map but also within the policy itself. Site e does not meet the first test.</p>	<p>Consider labelling the LGS map to show which designation is which for clarity.</p>	<p>Done. Site e does meet the first test as it is within walking distance of residents who pass by it daily as they join the footpath run-in along the northern edge of the land</p>
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