

Part A – Local Planning Authority comments in relation to the ‘basic conditions’

- 1.1 An independent examiner will assess the Titchfield Neighbourhood Plan against the ‘basic conditions’, which are:
1. Whether the neighbourhood plan has regard to national planning policies and advice contained in guidance issued by the Secretary of State.
 2. Whether the neighbourhood plan contributes to achieving sustainable development.
 3. Whether the neighbourhood plan is in general conformity with the Council’s development plan.
 4. Whether the neighbourhood plan complies with EU and human rights obligations.

Having regard to national policies and advice contained in guidance issued by the Secretary of State

The Local Planning Authority is concerned that there appear to be some areas of potential conflict between the Titchfield Neighbourhood Plan (TNP) and the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (PPG).

Policy Wording

- 1.2 The PPG sets out the requirements in relation to the wording of neighbourhood plan policies. In particular, the PPG states that policies:

“...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” (Paragraph 41, Ref ID: Ref ID 41-041-20140306).

- 1.3 There are a large number of policies that would benefit from further clarity to allow the decision maker to apply them consistently and with confidence. This is discussed further in Part B of this response.
- 1.4 There are several policies in the plan that require supporting text to explain their intent. Where introductory text has been supplied in the chapters that contain policies in the plan, the link between the policies and the supporting text should be made more explicit. There are several instances where more relevant information should be provided in the introductory text to each chapter, which should be related more directly to policies. In addition, throughout the TNP there is frequently a lack of justification to underpin the approach taken by the policies in the plan. It is suggested that each policy is reviewed to ensure it has the necessary context and evidence to underpin its inclusion and approach.
- 1.5 The Local Planning Authority is concerned that there appear to be areas of potential conflict between the TNP and the National Planning Policy Framework (NPPF) and PPG in relation to the wording of policies. Paragraph 16 of the NPPF states that neighbourhood plans should:

“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development”.

- 1.6 In addition, the PPG sets out the requirements in relation to the wording of neighbourhood plan policies as set out in paragraph 1.2 of this response. The Local Planning Authority is concerned that currently the specific wording of some of the policies is inconsistent with the requirements of the NPPF and PPG. In particular, the policies in the plan require added flexibility to ensure they plan positively to support local development and some of the policies require greater precision and detail to ensure they can be applied consistently and with confidence in the determination of planning applications in the neighbourhood plan area. The policy wording will be considered in detail through the independent examination process. Inflexible, imprecisely worded and unclear policies could potentially be subject to a recommendation for significant changes, or deletion, by the independent examiner. Part B of this report contains more specific comments in relation to this issue.

Evidence Base

- 1.7 Generally, policies contained within the TNP appear to be largely supported by the results of consultation events held by the Neighbourhood Forum. However, the PPG requires that the neighbourhood plan is supported by appropriate evidence. The Local Planning Authority is concerned that such evidence has not been presented at this stage. Therefore, the Local Planning Authority considers that it would be advisable for the Neighbourhood Forum to ensure that the Regulation 15 submission TNP is supported by additional information setting out the background and justification for the policies which have been included in the document.

Viability and Deliverability

- 1.8 The PPG states that a neighbourhood plan must not constrain the delivery of important national policy objectives. Paragraph 47 of the NPPF also sets out the need to boost significantly the supply of housing, whilst Paragraph 173 of the NPPF requires plans to be deliverable and viable. In addition, the PPG states that,

“what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery”. (Paragraph 45, Ref ID: 41-045-20140306).

- 1.9 The Pre-submission TNP has the potential to place additional financial burdens on development, for example through Policies H.3 (Local Need), H.4 (Quality Design and Local Character), G.A.2 (Cycle Links) and E.1 (New Development) Such obligations should not constrain the supply of new housing by undermining the deliverability and viability of relevant proposals and therefore it is suggested that additional justification is provided by the Neighbourhood Forum to demonstrate that these obligations will not undermine the deliverability of new development.

Contributing to achievement of sustainable development

- 1.10 Paragraph 72 of the PPG (Ref ID 41-072-20140306) states that:

“A qualifying body must demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that

consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions”.

- 1.11 There are some policies in the TNP which endeavour to support sustainable development such as seeking to provide a smaller mix of housing for specific groups. However, in trying to achieve sustainable development some of these policies may affect the viability and deliverability of new housing development. This is discussed in more detail in Part B of this report.
- 1.12 There is some information on how the TNP achieves sustainable development in the section on compliance with national policies. However, the basic conditions statement provided with the submission neighbourhood plan should demonstrate how each of the policies achieve sustainable development.

General conformity with the Council’s Development Plan

- 1.13 One of the ‘basic conditions’ is for the neighbourhood plan to be in general conformity with the strategic policies contained within the Development Plan. The strategic policies are contained within the Adopted Local Plan (ALP) which includes the Local Plan Part 1 (LP1): Core Strategy and the Local Plan Part 2 (LP2): Development Sites and Allocations.
- 1.14 It is welcomed that a draft Basic Conditions Statement has been provided as a supporting document for the Pre-submission TNP consultation. It is noted that the statement does not provide information on whether the neighbourhood plan is in general conformity with the strategic policies of the ALP. This information should be provided to support the Regulation 15 submission version of the neighbourhood plan.
- 1.15 There are some areas where there are potential conflicts with the strategic policies of the LP1 and LP2, which could be addressed through amended wording in the plan or further emphasis in the policies or supporting text. These concerns are set out in Part B of this report.

European obligations and human rights requirements

Strategic Environmental Assessment

- 1.16 One of the key elements of this basic condition relates to Strategic Environmental Assessment (SEA), which is required where a Neighbourhood Plan is likely to have ‘significant environmental effects’. The Local Planning Authority has previously screened the Draft TNP and determined that an SEA in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 is not required. However, at the time the screening assessment was undertaken there was not a clear proposal to extend the settlement boundary for Titchfield. If this were to facilitate development that would trigger an assessment within the

Titchfield Neighbourhood Plan area then the Council would need to re-visit the original screening opinion.

Habitats Regulations Assessment and Appropriate Assessment

- 1.17 The screening decision and report for the TNP confirms it is necessary to carry out an Appropriate Assessment. The Appropriate Assessment for the TNP concludes that the plan will not adversely affect the integrity of any European sites if the proposed approach to dealing with likely significant effects is followed. The proposed approach is set out in more detail in the Appropriate Assessment.

Human Rights Requirements

- 1.18 No detailed assessment appears to have been made in relation to human rights legislation (Human Rights Act 1998). It may be appropriate for the TNF to consider if an equalities impact assessment of the Pre-submission Neighbourhood Plan is appropriate to assess the positive and negative impacts on groups with protected characteristics. The Local Planning Authority can provide further advice in this regard.

Conclusion

- 1.19 The Council supports the neighbourhood planning process and in assisting the TNF in producing their neighbourhood plan. To that end, the LPA has a number of key concerns at this stage and has offered suggested amendments where possible when the Neighbourhood Plan falls short of the 'basic conditions'. The areas where the LPA considers the Pre-submission Titchfield Neighbourhood Plan falls short are:
- i. Having regard to national policies and advice (particularly the requirements of the PPG).
 - ii. Ensuring the Titchfield Neighbourhood Plan is in general conformity with the Adopted Local Plan (ALP), i.e. the Development Plan which includes Development Plan (Local Plan Part 1: Core Strategy and Local Plan Part 2: Development Sites and Policies) and does not undermine the strategic policies in the Development Plan.
- 1.20 Please note, in addition to the above (under category i), it is important to highlight that the Pre-submission Titchfield Neighbourhood Plan does not provide:
- Sufficient clarity to allow a decision maker to apply them consistently and with confidence when determining planning applications in the neighbourhood plan area.
 - Sufficient flexibility to ensure they plan positively to support local development.
 - Set out the justification and evidence to clearly support policy requirements.
 - The potential of some policy requirements to have a negative impact on viability and therefore the deliverability of housing.

Part B – Detailed assessment of the Titchfield Neighbourhood Plan (TNP) and supporting documentation

This section provides a detailed assessment of the TNP and supporting documents in relation to the ‘basic conditions’ requirements. This includes an assessment concerning how the TNP would operate in practice once it is ‘made’. Annex 1 to this response provides additional factual observations. The suggestions/recommendations are aimed at ensuring that the policies achieve the objective for which they are intended.

Policy/ Section	Issue	Relevant National Planning Policy Guidance/ Legislation	Options/Potential Changes Required to TNP
Front page	The neighbourhood plan period should be consistent throughout the plan. For example, the title on the front cover conflicts with paragraph 1.1 of the TNP.		Advise amending to 2018 - 20 <u>36</u>
Contents page (pages 1 and 2)	The contents page (pages 1 and 2) refers to Policy 5 - Smaller Dwellings, Policy H.6 Brownfield Sites and Policy T.2.1 - Pedestrian and Cycling Routes. However, these policies are absent from the TNP.		Advise deleting references to Policy 5, Policy H.6 and Policy T.2.1.
Contents page (page 3)	Appendices 16, 17 and 26 are missing from the contents page. These should be removed if they are no longer relevant.		Advise renumbering the appendices.
Foreword (page 5)	Reference is made to the TNP having ‘the force of law’. This statement is unclear and confusing and should be amended to ‘will become a statutory part of the Development Plan’.	<i>“If the majority of those who vote in a referendum are in favour of the draft neighbourhood plan, then the neighbourhood plan must be made by the local planning authority within 8 weeks of the referendum”.</i> (Paragraph 64, Ref ID: 41-064-	Advise amending text to be consistent with the PPG.

		20170728).	
1.1 – The Neighbourhood Plan (page 7)	<p>The second paragraph of this section makes the following statement: “This document sets out the aspirations of the community”. The Forum should note that any aspirations related to non-land use matters should be set out in a companion document or annex as stated in the PPG.</p> <p>The final sentence of this section ‘The health and well-being if the residents in reflected throughout....’ is not clear or well related to this section of the plan. There are no further points in the plan where health is mentioned.</p>		Advise either deleting the sentence or provide further explanation which clearly relates to the objectives/policies within the TNP.
1.2 – Housing (page 7)	<p>The second sentence refers to ‘History (FBC Emerging Local Plan 2018 – 2036, p.32 policy H1 Strategic Housing Provisions) shows us that approximately 10% of the housing demand will be met by windfall sites (see Glossary p59) within the Borough’. At this juncture, it is not clear how the housing demand will be met from windfall sites. The plan should provide further justification and evidence for the approach taken.</p>		<p>Advise deleting the reference to ‘History’.</p> <p>Advise providing further analysis on the windfall rates in Titchfield to provide a more accurate basis on which to rely upon.</p>
1.3 Getting Around (page 7)	<p>This section refers to traffic policies and tasks, however, there is no reference to the relevant policies and tasks. It is advised that reference to the policies and tasks in Chapter 10 are included in this section.</p>		Advise adding reference to policies and tasks in Chapter 10.
1.4 – Commercial and Economic Considerations (page 7)	<p>Reference is made to ‘Proposals to convert business or commercial premises into residential use will be resisted’. This text sounds like policy wording and is contrary to the GDPO 2015.</p> <p>In addition, there is no further clarification in relation to this sentence throughout the plan and it is recommended that this sentence is removed from the TNP.</p>	<p>Permitted Development: <i>“Development consisting of a change of use of a building and any land within its curtilage from, a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order, to a use falling within Class C3</i></p>	Advise deleting sentence.

		<i>(dwellinghouses) of that Schedule.</i> (Town and Country Planning (General Permitted Development) Order 2015 Schedule 2, Part 3, Class O).	
1.6 Historic Titchfield (page 7)	The last paragraph of page 7 in italics does not sit well within this section. In addition, the last sentence of this paragraph is unclear. Suggest moving the last paragraph to section 4.1 of the plan and providing further clarification in respect of the last sentence of the paragraph.		Advise moving the sentence to section 4.1 of the plan.
Chapter 3 – Titchfield Today (page 11)	Reference is made to the Conservation Areas within Titchfield and Listed Buildings. It would be helpful if the Conservation Areas and Listed Buildings were shown on Map 1 in the plan (or a separate map) and then linked to the text in Chapter 3 of the NP.		Advise including the Conservation Area and Listed Buildings in Map 1. Advise including a reference in the text in the first sentence of Chapter 3 to Map 1 once the map has been amended.
Chapter 3 – Titchfield Today (page 11)	English Heritage is now known as ‘Historic England’.		Advise reference to English Heritage is changed to Historic England.
Chapter 4 – How the Neighbourhood Plan Developed (Chapter 13)	It is advised that the information set out in Chapter 4 may be better placed in a background document to the TNP.		Advise placing the information in Chapter 4 in a separate background document.
4.1	Reference is made in the first paragraph that the 'Neighbourhood Plan must support the	<i>“i.e. the making</i>	Advise amending

<p>Neighbourhood Plan-Making and Planning (page 13)</p>	<p>FBC Local Plan'. This is not accurate. The Neighbourhood Plan must be in 'general conformity with the strategic policies contained in the development plan for the area of the authority'.</p>	<p><i>of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)."</i> (PPG, Paragraph 65, Ref ID: 41-065-20140306).</p>	<p>paragraph in line with the PPG.</p>
<p>5.1 The Plan boundary takes the village as its focus (page 15)</p>	<p>The second paragraph of section 5.1 makes the following statement 'protected public open spaces such as Chilling Woodland (Thatcher's Copse) and Titchfield Haven National Nature Reserve'.</p> <p>Further clarification should be provided in terms of the status of the protection that these sites have.</p> <p>In addition, it is advised that Map 2 should be more clearly labelled. The current scale of the plan makes it difficult to read.</p>		<p>Advise amending the paragraph as follows: 'Thatcher's Copse is a Site of Importance for Nature Conservation and an Ancient Woodland and Titchfield haven NNR is statutory designated as part of the Solent and Southampton Water Special Protection Area (SPA) and Ramsar site, and a Site of Special Scientific Interest (SSSI)'. Advise providing Map 2 at a clearer scale (see general comments in Annex 2 of this response.</p>

<p>5.2 Urban Area Boundary (page 16)</p>	<p>The first paragraph of the section makes the following statement “The NP Policy H.3 recommends extending the existing Urban Area Boundary for Titchfield to include properties along Southampton Hill”. First, the reference to Policy H.3 is incorrect and should be amended to ‘Policy UAB.1. Urban Area Boundary’. Also, the TNP refers to ‘recommends extending the existing Urban Area Boundary’. However, this includes Policy UAB.1 in the plan, which extends the Settlement Boundary, rather than <i>recommending</i> that it is extended.</p> <p>Furthermore, the proposal for extending the Settlement Boundary is not in general conformity with the strategic policies of the Adopted Local Plan and does not have regard to the NPPF. First, in relation to the 2012 NPPF, the definition of previously developed land excludes ‘land in built up areas such as residential gardens’. Therefore, the extension of the boundary would be treated as ‘greenfield’ as effectively it would be included within the Settlement Boundary (‘built up area’) for Titchfield and therefore contradicts the purpose of including this land for ‘small scale development’. In addition, the proposed extension to the Settlement Boundary includes land to the south of properties 5-21 Southampton Hill. This land is not part of the curtilage of any of the properties on Southampton Hill and including this land as part of the Settlement Boundary is effectively allocating a site for housing. The proposed extension in this case would allow for further housing within the Settlement Boundary for Titchfield. Therefore, housing development on this site would not be considered ‘windfall’ as it would allow housing to come forward on this site. The Council is unclear what the Neighbourhood Forum’s intention is within the Pre-submission Plan as it lacks clarity. If it is the Forum’s intention to allocate a site by amending the DUSB, then additional evidence should be provided to explain the rationale for including this site within the TNP. It would also not be in conformity with the ALP. Please also note that if the Forum submit the TNP under the 2018 NPPF (paragraph 122) there has been a change of emphasis in respect to garden land.</p>		<p>Advise addressing points raised.</p>
<p>5.3 Strategic Gap (page 17)</p>	<p>The first paragraph of this section makes the following statement ‘In effect the gap represents a green jacket around the village’. This statement is unclear and confusing as to its meaning and implications.</p> <p>It is advised that further clarification is provided on policy CS22 in the Adopted Local Plan in relation to the Strategic Gap.</p>		<p>Advise providing further clarification in relation to references made on the Strategic Gap.</p>
<p>Chapter 6 – The Vision for Titchfield (page</p>	<p>Chapter 6 sets out a vision and core themes for Titchfield. A link should be provided between the vision and the policies in the TNP.</p>		<p>Advise addressing points.</p>

19)	Core Theme 7 refers to 'promoting a village emblem, supporting the Britain in Bloom village entry'. This core theme goes beyond the remit of planning and may be better placed as a 'task' in a companion document or annex.		
Chapter 7 – Turning the Vision into a Plan (page 19)	The first paragraph of this chapter sets out the key areas that the plan will address and how these areas were devised, i.e. through consultation meetings. It is advised that this information should be set out within the Consultation Statement.		Advise moving the information under Chapter 7 to the Consultation Statement.
7.1 Strategic Environmental Assessment (SEA) (page 19)	Reference is made to SEA in the first and second paragraph. Although this is useful information it is not understood how this relates to the plan in respect of the basic conditions. In addition, reference is made to the Forum having 'received the SEA' is incorrect. The Forum received a Screening Report and Appropriate Assessment, and a Screening Decision from the Council.		Advise that the section on SEA could be moved to the Basic Conditions Statement and explained more fully. In addition, the LPA advise that the statement in relation to receiving the SEA should be amended to 'The Council provided the Forum with a copy of the Screening Report and Appropriate Assessment, and a Screening Decision Notice'.
7.2 The Titchfield neighbourhood Plan, the National Plans and the FBC Plan (page 20)	The first paragraph combines three separate quotes from the NPPF and a Resolution from the United Nations Assembly. Advise that these quotes are separated so they can be read more easily. In addition, the quotes from Paragraph 14 of the NPPF (text box on page 4 of the NPPF) are incorrect and should be amended. Furthermore, the quote from Paragraph 9 should refer to both Paragraph 9 and 10 of the NPPF.		Advise separating quotes so they are easier to read. Advise amending the quotes to accurately reflect the NPPF.
Table.1. (pages 20 and 21)	There are several policies within the table where either the policy reference is not consistent with the reference of the policy in the main body of the plan or the policy does not appear to be present in the TNP. Policy references should be reviewed and revised. In addition, the Forum have made reference to chapters within the NPPF as indicators		Advise amending the table so policy references in the plan are consistent.

	for achieving sustainable development, but has not included chapters 3,5 or 13. Any explanation of why these chapters have not been included should be provided. Furthermore, there are specific sections on plan-making and decision taking, which makes specific reference to neighbourhood plans. Again, these should be referred to.		Advise that all policies in the TNP are cross referenced in the table.
7.4 Support for FBC Local Plan (page 22)	The LPA advise that further clarification and explanation should either be provided in this section in relation to how the TNP is in general conformity with the strategic policies of the Adopted Local Plan, or in the Basic Conditions Statement which should then be linked to the TNP.		Advise providing further clarification and explanation.
Table.2. (pages 22 and 23)	<p>There are several policies within the table where either the policy reference is not consistent with the reference of the policy in the main body of the plan or the policy does not appear to be present in the TNP. Policy references should be reviewed and revised.</p> <p>In addition, the table only refers to 5 policies in the Local Plan Part 1: Core Strategy (LP1). There appears to be no reference to any of the other strategic policies in the LP1 or any of the policies in the Local Plan Part 2: Development Sites and Policies (LP2).</p>		<p>Advise amending the table so policy references in the plan are consistent.</p> <p>In addition, the LPA advise that the plan should cross refer to strategic policies in the LP1 and LP2 where relevant. The Basic Conditions statement should include a more detailed assessment of how the plan is in general conformity with the strategic policies of the Adopted Local Plan (LP1 and LP2).</p>
Chapter 8 – The Structure of the Plan (page 25)	The last box on the page refers to aspirational tasks. It is noted that the TNP refers to the tasks as mainly aspirations identified by the Forum that relate to non-land use matter. However, the LPA advise that these tasks should be moved to a separate annex or companion document to the TNP.	<i>“Wider community aspirations than those relating to development and use of land can be included in a in a neighbourhood plan, but actions</i>	Advise moving all tasks to a separate annex or companion document to the TNP.

		<p><i>dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex” (PPG, Paragraph 4, Ref ID: 41-004-20170728).</i></p>	
<p>Map.5. – Housing (page 26)</p>	<p>The key on the map refers to the ‘built up area’. Although it is understood what is meant by ‘built up area boundary’, the adopted Local Plan refers to this as the Defined Urban Settlement Boundary (DUSB). Therefore, the LPA advise that a note should be included below the map to provide further explanation.</p> <p>In addition, the key refers to a 'key point of interest within the Plan Area', it is not clear what this is referring to and further clarification should be provided in this respect.</p> <p>The LPA are concerned that the map could be misread. As it appears (at the current scale in the Pre-submission Plan) that only parts of the Conservation Area for Titchfield can be seen on the map. The LPA advise that this should be amended by clearly defining both the Conservation Area for Titchfield and the Defined Urban Settlement Boundary.</p>		<p>Advise deleting ‘built up area’ and replace with ‘Defined Urban Settlement Boundary (DUSB)’.</p> <p>Advise providing further clarification as to what a 'Key point of interest within plan area' is referring to.</p> <p>Advise making changes to the Conservation Area for Titchfield.</p>
<p>9.1. Background and rationale (page 27)</p>	<p>Whilst not a policy, the first paragraph of this section does not provide any clarity for potential planning applications in the Titchfield Neighbourhood Plan area. It is advised that further clarification is provided by making specific references to the NPPF and the ALP.</p> <p>The second paragraph refers to the historic environment in relation to Titchfield. This paragraph should be moved to Chapter 13 of the TNP.</p> <p>The fourth paragraph of this section repeats the penultimate paragraph in Chapter 3 – Titchfield Today (page 11). Suggest removing the text from Chapter 3. In addition, the Forum could include a link to Appendix 31 in this paragraph.</p>		<p>Advise amending TNP.</p>

	<p>Map 5 seems to be a copy of Map 6 on page 26 and could therefore be removed from the plan.</p>		
<p>9.2 Meeting future housing needs in Titchfield (page 27)</p>	<p>Update second paragraph to reflect the changes to national policy. I would refer you in particular to the transitional arrangements in the NPPF published on 24th July 2018. These arrangements are found in Paragraph 214 of the NPPF.</p>		<p>Advise updating second paragraph.</p>
<p>Section 9.3 How many additional houses are need in Titchfield? - Section 9.6 Where will the new houses be built (pages 28 - 30)</p>	<p>Section 9.3 – 9.6 provides details on the Housing Needs Assessment completed by AECOM for the TNP. Reference is made to Paragraph 20 of the AECOM report which states that,</p> <p>“in arriving at a final housing figure, we do not judge there is any justification to make an uplift to the figure beyond 262 dwellings for the Neighbourhood Plan period”.</p> <p>Following this statement there are a number of assumptions that are made in these sections as to how the housing requirement figure can be fulfilled. However, there is no reference to how this will be met until section 9.6 (page 30).</p> <p>Reference is made to a number of housing completions being counted towards the housing figure being identified for the Titchfield Neighbourhood Area in the AECOM report. However, the Titchfield Neighbourhood Plan covers the period 2018 – 2036. Therefore, any housing completions before 2018 cannot be counted towards meeting the requirement up to 2036. Further analysis should be included in an Appendix linked to this section to demonstrate that 10 dwellings would come forward through windfall development in the Titchfield Neighbourhood Plan area.</p> <p>In addition, the grey box on page 28 sets out the requirement for plan period, i.e. to 2036, not to 2034. The Forum should include an additional two years requirement to cover the TNP period.</p> <p>Furthermore, the LPA is concerned in respect of the reference to reviewing the TNP after 5 years. If, the Forum relies on this evidence from the AECOM Housing Needs Assessment, then it would need to be clear how the Pre-submission Plan meets housing need up until 2036.</p> <p>The LPA advise that these paragraphs are amended to provide an improved relation</p>	<p><i>“Neighbourhoods should: Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development”.</i> (Paragraph 16 of the NPPF).</p>	<p>The LPA advise that the Pre-submission plan should provide further justification in Sections 9.3-9.6 as to how windfall development will meet the housing requirement set out for the Titchfield Neighbourhood Plan area. This information should be supported by evidence.</p> <p>In addition, the LPA advise that the Forum should review the permissions referred in terms of constituting part of the neighbourhood plan area housing figure over the plan period.</p>

	with Policies H.1 – H.3 to provide clarity as to what these policies are trying to achieve, and to provide justification and the rationale for including the policies in the TNP.		
9.4 Types of dwellings in Titchfield (page 29)	<p>This section refers to 2011 census data in relation to the types of dwellings in the Titchfield Neighbourhood Plan area and make comparison to the rest of the Borough and national levels. However, there is no data provided in the TNP to illustrate this comparison.</p> <p>In addition, there is no information provided in this section to demonstrate that these properties are either rented or owner occupied. Further clarification should be provided in this respect.</p>		<p>Advise providing Borough and national information on types of dwellings.</p> <p>Advise providing clarification as to the split of rented/owner occupied housing.</p>
9.5 What sort of dwellings do we need in Titchfield (page 29)	Paragraph 1 of this section refers to ‘social housing’ and ‘affordable rented housing’. Social rent and affordable rent are two different terms, but are both forms of affordable housing. The 2018 NPPF provides up to date definitions of both.		Advise clarifying the types of affordable housing.
9.6 Where will the new houses be built? (page 30)	<p>Reference is made to paragraph 5.46 of the Fareham Local Plan 2036 and the development opportunities which have been identified in Titchfield. The plan states that the quote is taken from the Draft Fareham Local Plan 2036 which is incorrect, the quote is taken from the Adopted Local Plan Part 1: Core Strategy (2011). The reference should be amended in this respect.</p> <p>Reference is made to Policy H6 - Brownfield Sites. However, Policy H6 does not appear to be in the TNP. In addition, paragraph 4 of the sections refers to a community consultation where preference was shown for brownfield rather than greenfield sites. A link to the relevant evidence base should be provided in this respect.</p> <p>In addition, the TNP should provide additional clarity in terms what appears to be a proposed extension to the Settlement Boundary. The proposed extension would allow for potential development within the boundary, which the LPA would not consider to be ‘windfall’ (Please see more detailed comments in relation to section 5.2 above).</p> <p>Furthermore, the last paragraph of the section is unclear and confusing. The housing allocation (H3) referred to in this paragraph is part of the Draft Fareham Local Plan 2036, and the site is not within the ward boundary for Titchfield. The paragraph should be amended to reflect this.</p>		Advise making suggested amendments.
Aim (page 31)	The aim refers to ‘the emerging plan 2036’. It is recommended that this is amended to		Advise amending aim.

	‘Draft Fareham Local Plan 2036’. Also, this aim conflicts with Objective H1 and should be amended accordingly.		
Objective H.1. (page 31)	The objective states ‘New housing should be provided within the revised Urban Area Boundary’. This objective sounds like policy wording. It is recommended that the wording of the objective is reviewed and revised. In addition, the Objective refers to Policy H.3 and this is incorrect and should be Policy UAB.1.		Advise amending Objective H.1
Objective H.2 (page 31)	This objective refers to Policies H.5 and Policies H.6 neither of these appear in the TNP and reference to these policies should therefore be removed.		Advise removing references to Policies H.5 and H.6.
Objective H.3. (page 31)	This objective sounds like policy wording and repeats Policy H.2. The LPA advice that the Objective should be removed.		Advise deleting Objective H.3.
Objective H.4 (page 31)	This objective sounds like policy wording. It is recommended that the wording of the objective is reviewed and revised. In addition, the objective refers to Policy H.4 this is not necessary. Consider removing the reference from the objective.		Advise amending Objective H.4. Advise deleting reference to Policy H4.
Section 5.2 (page 16) and Policy UAB.1. – Urban Area Boundary (page 31)	Policy UAB.1. reads as more of an objective/introductory text. The policy text also infers that the TNP will review the Urban Area Boundary. However, the TNP appears to be proposing an amendment to the Urban Area Boundary within the Pre-submission Plan as previously mentioned. The policy is contrary to the strategic policies in the ALP and the 2012 NPPF. The policy should be accompanied by proportionate evidence and supporting text that provides justification and rationale for the change to the settlement boundary for Titchfield. In particular, the Council published a Settlement Boundary Review in October 2017. Chapter 4 of the Review provides a number of factors that were used in the assessment of boundaries in the Borough. Also, the reference to ‘page’ should be deleted. The windfall rate that is relied upon does not ‘cap’ site sizes, whereas Policy H1 does cap sites, to 10 dwellings. Further clarification should be provided as to whether a cap applies or not. Also, further evidence should be provided by the Forum to demonstrate that this capping would not restrict windfall. In addition, the Forum should note that the NPPF (2012) definition of previously developed land excludes, ‘land in built-up areas such as residential gardens’. This	<i>“Policies 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.”</i> (Paragraph 41, Ref ID 41-041-20140306 of the	The LPA advise that additional clarification to the policy should be provided in the TNP. Advise deleting the reference to ‘page’.

<p>Policy H1. – Windfall Development (page 32)</p>	<p>definition has been slightly amended in the 2018 NPPF.</p> <p>The policy should be accompanied by proportionate evidence and supporting text that provides justification and rationale for the inclusion of Policy H.1 in the TNP.</p> <p>Policy H1 advocates a ‘maximum’ (up to 10 dwellings) dwelling number for small scale infill development. In line with the principles of the NPPF it would be beneficial if the policy was worded in a more positive manner to provide flexibility over the life of the neighbourhood plan. In addition, the term ‘as far as possible’ could not be applied to a planning application with precision.</p> <p>At this juncture, given the lack of proportionate evidence provided, it is unclear how this policy complies with the strategic policies of the ALP.</p>	<p>PPG).</p> <p><i>“Policies 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.”</i> (Paragraph 41, Ref ID 41-041-20140306 of the PPG).</p>	<p>The LPA advise that further justification and rationale should be provided for Policy H.1.</p>
<p>Policy H.2. Affordable Housing (page 32)</p>	<p>The spirit of this policy is noted; however, the LPA is concerned how this policy would operate in practice.</p> <p>It is suggested that the policy requirement is clarified. As it stands the requirement is unclear and as currently worded would not accord with the requirements of the PPG. The terms ‘should’ and ‘appropriate’ could not be applied to a planning application with precision.</p> <p>In addition, supporting text should be provided to explain the rationale behind the policy.</p> <p>As it currently stands, the TNP does not accord with the 2012 NPPF and detailed guidance in the PPG in relation to affordable housing requirements.</p>	<p><i>“Policies 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.”</i></p>	<p>The LPA advise addressing the issues raised.</p>

		<p>(Paragraph 41, Ref ID 41-041-20140306 of the PPG).</p> <p><i>“Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area).”</i></p> <p>(Paragraph 31, Ref ID 23b-031-20161116).</p>	
<p>Policy H.3. Local Need (page 32)</p>	<p>It is not clear if the policies apply to market or affordable housing or both.</p> <p>The policy does not provide sufficient clarification as to the exact mix of units that are required on a new development site. The policy currently reads that all new housing should be ‘smaller dwellings’ which would impact upon development viability. The LPA is concerned that the Neighbourhood Forum has not drawn upon evidence in justifying or testing a proposed specified housing mix. It would be helpful for the Neighbourhood Forum to provide further justification and clear evidence on this policy requirement prior to the submission of the Neighbourhood Plan. Also, the term ‘should’ could not be applied to a planning application with precision.</p> <p>In addition, the consequences of this policy also need further clarification. Restricting the mix of new dwellings to those that are ‘mainly smaller’ dwellings could result in people being forced to move out of the Neighbourhood Plan Area. An Equalities Impact Assessment (EIA) should be completed on this policy in this respect.</p>	<p><i>“Policies 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.”</i></p>	<p>The LPA advise that additional clarification to the policy should be provided in the TNP.</p>

		<p>(Paragraph 41, Ref ID 41-041-20140306 of the PPG).</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (Paragraph 173 of the NPPF).</i></p>	
<p>Policy H.4 – Quality Design and Local Character (page 32)</p>	<p>There is no evidence provided or supporting text to justify and explain the rationale of Policy H.4.</p> <p>It is suggested that the policy requirement is clarified. As it stands the requirement is unclear and as currently worded would not accord with the requirements of the NPPF and more detailed guidance in the PPG in relation to viability and design. In addition, the</p>	<p><i>“Policies should be drafted with sufficient clarity that a decision maker can apply it consistently</i></p>	<p>The LPA advise that further clarity should be provided on the policy requirements in the supporting text that justifies and explains</p>

	<p>terms 'respects' and 'creates' could not be applied to a planning application with precision.</p> <p>Criterion c) of the policy text refers to 'public and private areas' and it is not clear as to what this refers to. The LPA would recommend providing further clarification in the policy text to define these terms. In addition, there are two criterion c's and two criterion d's and therefore, the policy criterion should be renumbered.</p> <p>In terms of the reference to 'views and vistas' and 'local landmark' in criterion d) it would be useful for the TNP to illustrate these views and vistas and local landmarks on a map.</p> <p>Further explanation is required in the policy text as to what constitutes 'green technologies' and 'local materials', and how this would not adversely impact on viability of a development.</p> <p>In addition, you may wish to consider what criterion g) adds to existing local policy prior to the submission of the neighbourhood plan.</p>	<p><i>and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.”</i> (Paragraph 41, Ref ID 41-041-20140306 of the PPG).</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is</i></p>	<p>the rationale for the policy.</p> <p>Advise providing a map on a side of A4 that illustrates the views and vistas and local landmarks indicated in criterion d) of the policy.</p> <p>Advise renumbering the policy criterion.</p> <p>Advise providing a further explanation of 'green technologies'.</p>
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		<i>threatened</i> (Paragraph 173 of the NPPF).	
10.3 – Background (page 33)	<p>Clarification of the history of traffic problems and what has been carried out historically to resolve them would be pertinent to assist readers in understanding what has been completed previously, preferably more recently than the 1930's A27 works or 1960's South Street chicanes.</p> <p>Reference should also be made to the significant investment and enhancement to the A27 between Segensworth Roundabout and Titchfield Gyratory (circa £15 million in the Titchfield area) with the aim of ensuring more reliable journey times on the A27 and reducing the need for motorists to seek alternative routes.</p>		<p>Advise providing further clarification and information on historical traffic problems and what has been carried out to resolve them.</p> <p>Advise adding reference to the upgrades and enhancements to the A27.</p>
10.4 – Where we are now (page 34)	<p>A summary of the issues and works undertaken recently should be included in this section, rather than just referencing Appendix 19 (link broken in the Plan document).</p> <p>There is a lack of connectivity within the plan document linking transport requirements and proposals for housing, focusing on the reasons behind the need for improvements to the transport links and how these can be facilitated through new development.</p> <p>Images within Appendix 19 are too small to be of use or legible. The text refers to pinch-points, lack of adequate crossing facilities and more, which should be noted and locations identified on a larger plan. Indication of where additional facilities could be located for the purpose of further review by the Highway Authority (Hampshire County Council) should also be annotated on a Map in the plan.</p> <p>Appendix 19 also refers to traffic flows on Coach Hill undertaken by the Forum and TVT members, but make no reference to the day(s) or times at which this data was collected. It is therefore suggested that the Forum procure a traffic survey through the Highway Authority to accurately determine the traffic flows and movements through the village to enable informed decisions to be made in the future. The vehicle count data within Appendix 19 is not validated and no evidence of video recording methodology. Vehicle counts required as an appendix, to include who undertook the survey, how this was analysed, the dates and times of the survey. Results should be produced in a tabular format by date and time using 5 minute 'bins' for the count and carried out on multiple days at a neutral time of day, day of week, and month. In addition, pedestrian</p>		<p>Advise including a summary of the traffic issues and work undertaken recently in Section 10.4.</p> <p>Advise improving the quality and size (should be A4) of the images in Appendix 19.</p> <p>Advise providing information on where additional facilities could be located for review by the Highway Authority. This information should be annotated on a Map in the plan.</p> <p>Advise liaising with the Highway Authority to procure a traffic survey</p>

	<p>counts should be undertaken, to give an indication of the levels of demand. Identification of where pedestrians are currently trying to cross would be useful in a pictorial format (mapped). Details should be in an appendix to the TNP.</p>		<p>to accurately determine traffic flows and movements throughout the village.</p> <p>Advise undertaking pedestrian counts to provide an indication of the levels of demand. This should be included in a separate Appendix with maps to illustrate count locations.</p>
<p>10.5 – Pedestrians (page 34)</p>	<p>There is no evidence within the Plan or supporting documentation to support the claim of speeding vehicles, and traffic speed surveys should be undertaken to justify these comments.</p> <p>In reference to the narrow footpaths and crossing points, the TNP is seeking to keep the character and form of the village preserved and seeks development is appropriate and considers this. The narrow footpaths are a feature of the nature of the village. Wider footpaths, although able to cater for all pedestrians would be of detriment to the historic nature of the village and would have the impact of urbanising the area. The addition of numerous signalised or zebra crossing points would have the same effect. This should be recognised within the text of Policy GA1 (Pedestrian Safety) and wording to the effect of ‘appropriate modifications and installation of footways and pedestrian crossing points shall only be considered where appropriate and in keeping with the character of the surrounding areas’. The locations of these crossings would need to be investigated in conjunction with new development.</p> <p>Furthermore, it is unclear what the relevance of the word count in relation to the HCC transport document and the word ‘pedestrian’ in terms of the context of the TNP.</p>		<p>Advise providing further evidence to substantiate the claim made on the image in section 10.5.</p> <p>Advise adding the following supporting text to Policy GA1 – Pedestrian Safety.</p>
<p>10.6 - Parking</p>	<p>With reference to the meeting with the Hampshire County Council (HCC) representative, FBC suggest the plan should avoid referring to unsubstantiated conversations with individuals. The Highway Authority must be able to comment on this statement.</p> <p>Reference is made to Fareham Borough being second in the county for car ownership, this statement should be supported by evidence through analysis of ONS data sets.</p>		<p>Advise adding date of the meeting with HCC to Section 10.6.</p> <p>Consider adding evidence to support the</p>

			statement on car ownership.
10.7 – Car Parks in the Plan Area (pages 35 and 36)	<p>The current parking facilities should be mapped for ease of identification and to assess their accessibility from the Village centre, and the number of spaces should be identified and totalled. This could be provided in a relevant Appendix to the TNP.</p> <p>From the information provided in the section there is a total of 242 off-street spaces within the listed car parks. In conjunction with the on-street provision in the village centre, an assessment is needed on the use of the parking facilities to determine any additional spaces needed or revision of restrictions to increase vehicle turnover, thereby allowing a greater footfall within the village.</p> <p>In addition, the fifth bullet point in this section refers to ‘a car park provided off Cartwright Drive to serve the Country park when the adjacent residential development is complete’. It might be useful to provide a planning application reference number.</p> <p>The final sentence of the section is not clear and should be rephrased.</p>		<p>Advise mapping the current parking facilities in the village centre.</p> <p>Advise providing an assessment of the use of the parking facilities to determine any need for additional spaces.</p> <p>Advise amending the final sentence to ‘Safety concerns have been raised where reduced road widths as a result of parking within the village, may have impacts on accessibility for emergency services’.</p>
10.8 - Residents Parking (page 36)	<p>There is no FBC policy on the introduction of Residents Parking Schemes.</p> <p>The responsibility for the introduction/modification of on-street parking controls, including residential parking zones, lies with the highway authority, Hampshire County Council and future advice should be sought from them.</p>		Advise contacting the Highway Authority (HCC) in respect of advice on the introduction/modification of on-street parking controls, including residential parking zones.
Section 10.10 Trains (page 36)	Clarification should be provided that the train stations listed are the nearest to the Titchfield Neighbourhood Plan area for accuracy.		Advise providing additional clarification.
Section 10.12 – Cycling (page 37)	The first sentence of the section states that ‘cycling in and around Titchfield is difficult and hazardous in most areas’ This statement should be quantified by sourcing accident data from the relevant authorities. The data can then be used to justify the statement		Advise providing additional data on cycling in Titchfield to

	<p>regarding cyclists and pedestrians using the canal path. Potential cycle routes to key services and facilities should also be reviewed – schools, shops, etc.</p> <p>The shaded box in section 10.12 states that, “The NP is <i>not in favour</i> of cyclists using the canal path”. The neighbourhood plan should avoid the use of emotive language.</p> <p>In addition, it is not clear how Map 7 relates to the policies of the TNP further clarification should be provided in this respect. If the proposed cycle route is in aspiration this should be added in a companion document or annex to the plan.</p>		<p>justify the statements in Section 10.12.</p> <p>Advising providing further clarification as to how Map 7 relates to the TNP.</p>
<p>10.13 Footpaths (page 38)</p>	<p>This section goes beyond the remit of planning and the information here may be better placed as a task in a separate companion document or annex to the TNP. Contact with HCC and FBC should also be made in relation to this aspiration.</p>		<p>Advise moving these tasks to a separate annex or document and consider contacting HCC and FBC in relation to the aspiration.</p>
<p>10.14 – Transport aims, objectives, policies and tasks (page 39)</p>	<p>The first paragraph of section 10.14 refers to Policy INF2 from the draft Fareham Local Plan 2036 but then does not provide any further information on this policy. It is suggested that this reference is deleted. The paragraph then refers to a quote from the Fareham Local Plan 2036. However, this quote is taken from paragraphs 4.46 and 4.47 of the Local Plan Part 1: Core Strategy (2011).</p> <p>The supporting text of the TNP seeks to limit the number of vehicles entering the village. However, the aim listed under section 10.14 seeks a traffic and parking environment. The aim is unrealistic and ultimately not achievable due to various polluting sources – cars, buses, delivery vehicles, residential borne pollutants such as open wood or coal-burning fires, businesses with extractors and combustion boilers or equipment. In addition, there is no mention of air quality in the supporting text to justify the aim.</p> <p>Revise the phrase ‘fit or disabled’ to read ‘all residents and visitors to the village’.</p> <p>The objectives and policies should be placed within the supporting text so that the objectives and policies can be seen to directly relate to the justification in the text.</p> <p>Suggest changing the title of this section as the policies and tasks are in section 10.12. The tasks listed in section 10.12 should be agreed with the Highways Authority (HCC). These tasks should be moved to a separate annex or document.</p>		<p>Advise deleting reference to Policy INF2. Amend source of quote to the Core Strategy.</p> <p>Advise amending the wording or deleting the aim as there is no mention of air quality in the supporting text to justify the aim.</p> <p>Advise amending the phrase ‘fit or disabled’ to ‘all residents and visitors to the village’.</p> <p>The LPA advise considering whether the policies and tasks are</p>

			<p>more appropriately located in Section 10.12 – Traffic Policies and Tasks (page 40).</p> <p>Advise contacting the Highways Authority (HCC) to agree tasks listed in Section 10.12. Move these tasks to a separate annex or document.</p>
Traffic Objective T.2 (page 39)	It is not clear how Traffic Objective T.2 relates to the policies in Chapter 10, or indeed the neighbourhood plan.		Advise either adding a policy in relation to Objective T.2. or delete the objective.
Section 10.12. Traffic Policies and Tasks (page 40).	<p>There is already a section 10.12 – Cycling on page 37 of the plan. The section and subsequent section requires renumbering.</p> <p>In addition, the Tasks T.1 – T.6, Tasks T.2.1 – T.2.2 and PO.2. – PO.3 are predominantly the responsibility of the Highway Authority. Contact should be made in the first instance with the Highway Authority to consider whether these tasks can be agreed, and if so how these will be delivered and funded. Fareham Borough Council would welcome engagement in the discussions as the Local Planning Authority.</p>		<p>Advise renumbering 10.12 – Traffic Policies and Tasks.</p> <p>Advise contacting HCC and FBC to agree Tasks T.1 – T.6.</p>
Policy G.A.1 Pedestrian Safety (page 40)	<p>Further clarification should be provided so that the policy can be applied with precision and clarity. Remove ‘seek to respond’ and replace with ‘maximise’.</p> <p>Consideration needs to be given into how this policy could be applied to planning applications. The policy also needs to be linked into the TNP and justified through the supporting text where funding opportunities and the locations of the need for interventions are identified.</p>	<i>“Policies should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be</i>	Advise addressing the points.

		<p><i>concise, revise and supported by appropriate evidence.”</i> (Paragraph 41, Ref ID 41-041-20140306 of the PPG).</p>	
<p>Policy G.A.2 Cycle Links (page 40)</p>	<p>The spirit of this policy is noted; however, the LPA is concerned how this policy would operate in practice, or if the approach is viable and deliverable. There is concern that requiring all development to provide cycle route to other affects may affect the viability of new development. The Forum have not provided any evidence to justify the policy requirements.</p> <p>Also, any new proposed cycle routes should be discussed with the Highways Authority (Hampshire County Council). Furthermore, there is no indication within the TNP of other areas, communities or infrastructure to which these new and improved cycle routes should link, for example schools, shops, tourist destinations etc.</p>	<p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened</i> (Paragraph 173 of the NPPF).</p>	<p>Advise providing further information to address the issues raised.</p>
<p>Tasks T.2.1 – T.2.2.</p>	<p>The Council’s Public and Open Spaces team have confirmed that the Council have no maintenance responsibilities in relation to the canal paths and recreational footpaths and these tasks should be amended to reflect this.</p>		<p>Advise amending wording as appropriate.</p>

<p>10.13 Parking Objective 1 (page 41)</p>	<p>Add to the supporting text to demonstrate the need for additional parking provision and the extent of the required provision. The term 'adequate' in Parking Objective 1 should be quantified or deleted.</p>		<p>Advise providing additional supporting text to demonstrate the need for additional parking provision and the extent of the provision required.</p> <p>Advise deleting the term 'adequate'.</p>
<p>Policy P.1 New Development Parking (page 41)</p>	<p>The LPA advise that a revision should be made to the first line to read 'new development within the plan area' as this covers all development.</p> <p>The policy states that any new development within the Plan area must be completely self-sufficient in terms of off-road parking. This then goes on to state that 'wherever possible' they should include the maximum levels defined in the FBC parking standards. These two statements are contradictory. Suggest removing the 'must be completely self-sufficient' with 'must comply with the relevant Parking Standards SPD'. In addition, self-sufficiency of parking may not always be achievable or viable depending on the nature of the development and constraints of the location.</p> <p>Developments should have taken account of current FBC residential and non-residential parking standards, this may not always be maximum levels, again due to site viability or site constraints.</p>		<p>Advise replace 'any new, expanded, commercial or housing development' with 'new development'.</p> <p>Advise deleting 'must be self-sufficient' and replacing with 'must comply with either the Council's Non-Residential Parking Standards SPD or the Residential parking Standards SPD'.</p>
<p>CE. Objective.1. (page 44)</p>	<p>This objective reads more like a policy. It is not clear how this objective has been transposed into a policy.</p>		<p>Advise amending objective.</p>
<p>CE. Policy 1. – Loss of Retail premises (page 44)</p>	<p>There is a lack of information as to how applicants will provide sufficient information to comply with the policy requirements. It is strongly advised that further information should be provided in the supporting text to justify the rationale behind this policy linking to relevant evidence.</p> <p>Also, CE. Policy 1. states that proposals that result in the loss of retail units in specific locations in Titchfield Village will be 'resisted'. In line with principles of the NPPF (2012) it would be beneficial if the policy was worded in a more positive manner to provide</p>	<p><i>"Neighbourhoods should plan positively to support local development, shaping and directing development in</i></p>	<p>Advise providing further justification and additional clarification as to what the applicant would need to do to comply with the policy requirements.</p>

	<p>flexibility over the life of the neighbourhood plan. As currently worded the policy does not support new or improved employment opportunities within the areas listed.</p> <p>In addition, a map which covers at least a side of A4, with a key should be included to support Policy CE.1 to provide clarity on the areas that the policy relates to.</p>	<p><i>their area that is outside the strategic elements of the Local Plan”</i> (NPPF, Paragraph 16).</p>	<p>Advise re-considering policy wording in light of paragraph 16 of the NPPF (2012).</p> <p>The LPA advise that the Forum may wish to include wording in CE. Policy 1 for the encouragement of new or improved employment opportunities.</p> <p>Advise providing a map, which covers a full A4 page, to provide clarity on the areas that Policy CE.1 applies to.</p>
<p>CE. Policy 2. Accessibility (page 44)</p>	<p>CE. Policy 2 is not in general conformity with a number of policies in the ALP, such as CS5. For example, CE. Policy 2 does not take into account for other transport forms and not focus on walking alone. Accessibility should include cycling, public transport, walking to key trip attractors including schools, shops, tourist destinations, etc.; and should not be based solely around the location on new development. New development should be planned to enable and facilitate access to local services and facilities as well as pedestrian, cycling and public transport routes.</p> <p>In addition, the policy refers to Planning Policy Guidance Note 13: Transport (2006) as providing defined walking distances in relation to the policy. The PPG13 was cancelled in 2012 and replaced by the NPPF (2012). Therefore, this source can no longer be used to provide a definition of walking distances. Furthermore, the definition of walking distance is unclear and confusing and could not be applied with confidence to a planning application. The Forum may wish to refer to the Council’s Accessibility Study - http://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV14-BackgroundPaper-Accessibility.pdf</p>	<p><i>“Policies 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”</i> (Paragraph 41, Ref 41-041-</p>	<p>The LPA advises that the Neighbourhood Planning Forum revisits this policy prior to the submission of the plan.</p> <p>Advise that the reference to PPG13: Transport is deleted and the Forum consider using a different source in defining walking distance.</p>

		20140306 of the PPG).	
Chapter 12 – Natural Environment (page 45)	The image of the bird on page 45 is a yellow-throated vireo (a native of North America) and therefore, not likely to be found anywhere near Titchfield. This migratory bird may occasionally get blown off course and turn up in Britain but there have been very rare sightings on the west coast. As Titchfield is such a rich area for wading birds, the LPA suggests that a picture of a wader/wintering bird in the Titchfield area is used		Advise amending the image to a wader/wintering bird in the Titchfield area.
12.2 The Plan Area (page 45)	<p>Paragraph 3 of this section is currently confusing. Titchfield Haven is a National Nature Reserve and not an organisation, and therefore it is unclear how it could undertake any tasks.</p> <p>Paragraph 5 of this section makes the following statement: ‘Neither are there any bridleways’. This statement is incorrect. Hampshire County Council’s Public Rights of Way map identified Bridleway 82 as falling within the Titchfield Neighbourhood Plan area - http://localviewmaps.hants.gov.uk/LocalViewMaps/Sites/ROWOnline/#</p>		<p>Advise amending the reference to Titchfield Haven and providing further clarification.</p> <p>Advise amending reference to bridleways in the Neighbourhood Plan area.</p>
12.3 Care for the Environment (pages 45 and 46)	<p>The first paragraph of the section makes reference to 'energy efficiency measures' and 'housing improvements'. Energy efficiency measures are covered by building regulations.</p> <p>The third paragraph makes reference to ‘a culture of a litter free area will be encouraged and support for the FBC vigilant approach to fly tipping should be adopted’. This is an aspiration rather than an objective of the plan and should be included in a separate annex or document to the plan.</p> <p>The explanation of SuDs is incorrect and should be amended from ‘sustainable storm water drainage’ to ‘Sustainable Urban Drainage System’</p>		<p>Advise amending first paragraph.</p> <p>Advise adding the text as a separate task, which could be included in a companion document or annex to the TNP.</p> <p>Advise amending the explanation of SuDS.</p>
12.4 Open spaces (page 46)	<p>The second paragraph of this section makes the following statement ‘These spaces are variously owned and maintained by <u>private individuals</u>’. This statement should be amended to ‘public and private bodies’.</p> <p>Reference is made to the open spaces and that they ‘could be protected under the Assets of Community Regulations 2012. This might be a future development after consultation with residents’.</p> <p>This is an aspiration rather than an objective of the plan and should be included in a</p>		<p>Advise amending statement to ‘public and private bodies’.</p> <p>Advise adding the text as a separate task, which could be included in a companion document or annex to</p>

	<p>separate annex or document to the plan.</p> <p>The Forum may wish to consider whether the open spaces listed in this section may be better included within the TNP as Local Green Spaces providing they fit within the criteria in the NPPF.</p>		<p>the TNP.</p> <p>The LPA advise the Forum to include a Policy on Local Green Space in the TNP.</p>
<p>Environment Objective E.1 and Environmental Objective E.2 (page 47)</p>	<p>It is not clear how the objectives relate to policies in Chapter 12, or indeed in the TNP.</p> <p>In addition, Environment objective E.1 sounds more like a project and could be added as a task in a companion document or annex to the TNP.</p>		<p>Advise amending or deleting Objectives E.1 and E.2.</p>
<p>Policy E.1 – New Development (page 47)</p>	<p>The policy text would benefit from a multi-criteria approach. A number of the policy areas covered may fit within the policy in the neighbourhood plan on design. A different title may also be suitable, as “New Development” is quite broad and could cover a number of policy issues.</p> <p>In addition, the policy does not provide sufficient clarity so that it can be applied to a planning application. For instance, the policy text does not clarify how the impacts listed will be ‘assessed’ or ‘considered’. Strong consideration should be given to providing supporting text and evidence to justify the rationale for the policy.</p> <p>Furthermore, it is not clear how the policy relates to the Objectives in Chapter 12, or in the TNP.</p>	<p><i>“Policies 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”</i> (Paragraph 41, Ref 41-041-20140306 of the PPG).</p>	<p>The LPA advise the Forum to consider criterion based policy or separate the issues covered into different policies.</p> <p>Advise providing further justification and evidence to explain the rationale behind the policy.</p>
<p>Task E.1 (page 47)</p>	<p>Reference is made to SSSI. This is incorrect and should be amended to ‘SSSI’ (Site for Special Scientific Interest).</p> <p>Reference is also made to the Solent and Brent Geese Strategy 2010 which is due to be updated in 2018 and does not reflect current planning policies or the new site</p>		<p>Advise amending the reference to ‘SSI’ to ‘SSSI’.</p> <p>Advise making</p>

	<p>classification system currently used by Natural England and LPAs. A more updated document is the 'Solent Waders & Brent Goose Strategy 2018: Interim Project Report: Year one (October 2017)'. Therefore, the LPA suggests that a reference is made to the Interim Report, new classification system, 2017 current use mapping and the new (draft) Mitigation Guidance which have been considered since March 2018 for decision making by Natural England and Fareham Borough Council.</p> <p>The note under Task E1 states that '<i>leaving the EU may result in changes to these regulations</i>'. It is recommended that the specific 'regulations' are stated as for instance Ramsar sites are protected under the Ramsar Convention which is not relevant to the EU and SSSI sites are only protected under national law and not European legislation. In addition, this statement is irrelevant as remaining EU Regulations will be transposed into new UK Regulations.</p>		<p>reference to the updated Interim Project Report, classification system, current use mapping and new (draft) Mitigation Guidance.</p> <p>Advise providing specific reference to the relevant EU regulations.</p>
<p>12.6 Energy (page 48)</p>	<p>It is unclear how the aim listed under this section and Energy Objective EN. 1 have been transposed into a policy.</p>		<p>Advise adding a policy in relation to objective EN.1. or deleting the objective.</p>
<p>12.8 Open Spaces (page 48)</p>	<p>It is unclear, what this section adds to the TNP. The Forum may wish to consider whether the open spaces listed in Section 12.4 may be better included within the TNP as Local Green Spaces providing they fit within the criteria in the NPPF</p>		<p>Advise including a Policy on Local Green Space in the TNP.</p>
<p>Policy EN.1 Energy Efficiency (page 48)</p>	<p>The policy reads more like an objective and does not provide sufficient clarity so that it can be applied to a planning application. The policy may fit better as a separate criterion within Policy H.4 of the TNP. Strong consideration should be given to providing supporting text and evidence to justify the rationale for the policy.</p> <p>Is the policy relevant to all new housing development or all development? In addition, it is not clear how Policy EN.1 relates to Objective EN.1 or indeed the aim listed under section 12.7.</p>	<p><i>"Policies 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"</i> (Paragraph 41,</p>	<p>Advise adding the moving the policy and including it as a separate criterion in Policy H.4 of the TNP.</p> <p>Advise providing further justification and evidence to explain the rationale behind the policy.</p>

		Ref 41-041-20140306 of the PPG).	
12.9 Aims, objectives and task (page 49)	<p>It is not clear whether the last box on the page is an aim, objective or task. Further clarity should be provided in this respect.</p> <p>In addition, any tasks in this section should be included in a companion document or annex.</p>		Advise providing further clarification as to whether the last box on the page is an aim, objective or task.
Task GA.1 (page 49)	The tasks listed where reference has been made to working with HCC should be agreed with the Highways Authority (HCC).		Advise agreeing tasks with HCC.
Section 12.10 Footpaths (page 49)	There is no introductory text or supporting text to provide an explanation to this section. In addition, there is already a section on footpaths on page 38 (section 10.13) of the TNP where this information would be more relevant. The text in section 12.10 should be moved to section 10.13 of the TNP.		<p>Advise moving the text in section 12.10 to section 10.13.</p> <p>Advise providing introductory text.</p>
Chapter 12 – Historic Titchfield (page 51)	<p>There appears to be two Chapter 12's in the TNP. This chapter should be renumbered to 13.</p> <p>It is recommended that the supporting text within this chapter makes reference to the existing Conservation Area Appraisals.</p>		<p>Advise amending to Chapter '13'</p> <p>Advise making reference to the relevant Conservation Area Appraisals.</p>
13.5 The Great barn (page 52)	<p>The first paragraph of this statement refers to the Barn as being built in the early 14th century. The Historic England heritage listing for the monastic barn of Titchfield Abbey has the Barn as being built in the 15th century - https://historicengland.org.uk/listing/the-list/list-entry/1094235 The paragraph should be amended for accuracy.</p> <p>In addition, the second paragraph of the section notes that the Barn was 'acquired by FBC'. This sentence should be deleted as the Barn has never been within the ownership of FBC.</p>		Advise making the suggested amendments.
13.11 Titchfield carnival (page 54)	This section of the TNP goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP.	<i>“Wider community aspirations than those relating to development and use of land can</i>	Advise including section 13.11 in a companion document or annex.

		<p><i>be included in a in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex” (PPG, Paragraph 4, Ref ID: 41-004-20170728).</i></p>	
<p>13.13 A wayfarer map - and 13.14 Publications (page 54)</p>	<p>These sections of the TNP goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP.</p>	<p><i>“Wider community aspirations than those relating to development and use of land can be included in a in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex” (PPG, Paragraph 4, Ref ID: 41-004-20170728).</i></p>	<p>Advise including sections 13.13 - 13.14 in a companion document or annex.</p>
<p>Objective HT.3</p>	<p>From the information provided it is not clear what criteria would be used to select</p>		<p>Advise providing further</p>

(page 55)	<p>properties to be included or what a proposed record would comprise. Listed buildings are already included in the Heritage List for England - https://historicengland.org.uk/listing/the-list/. In addition, Hampshire County Council hold the Historic Environment Record for Hampshire, which is where additional research and information about heritage assets and archaeology are deposited - https://maps.hants.gov.uk/historicenvironment/</p>		<p>clarification on this objective.</p>
Objective HT.5 (page 55)	<p>This objective goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP. In addition, further clarity should be provided in relation to the terms 'presentation' and 'promotion' as the sentence as currently read is unclear.</p>	<p><i>“Wider community aspirations than those relating to development and use of land can be included in a in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex”</i> (PPG, Paragraph 4, Ref ID: 41-004-20170728).</p>	<p>Advise including objective HT.5 in a companion document or annex.</p>
Policy HT.1 Preserving Historic Environment (page 55)	<p>The policy refers to 'Development proposals that fail to preserve', consideration should be given as to how this policy wording would accord with paragraph 16 of the NPPF. Furthermore, the scope of the policy as it currently stands is unclear. For instance, the word 'significance' is associated with heritage assets in the NPPF, and some heritage assets have 'significance' but are not designations. Further clarification should be provided in the policy text.</p> <p>Further information to justify and explain the rationale behind the policy should be provided in the supporting text of the Historic Titchfield section in the neighbourhood plan.</p>	<p><i>“Neighbourhoods should plan positively to support local development, shaping and directing development in their area that is outside the</i></p>	<p>Advise amending the wording of the policy so it provides a more positive approach, and consider the wording in light of the relevant section of the NPPF (pages 54-57).</p> <p>Advise moving</p>

	<p>In addition, it is not necessary to provide a source or reference for a policy, this should be deleted.</p>	<p><i>strategic elements of the Local Plan” (NPPF, Paragraph 16).</i></p> <p><i>“Policies 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” (Paragraph 41, Ref 41-041-20140306 of the PPG).</i></p>	<p>reference to the NPPF to the introductory text of the section where relevant.</p>
<p>Policy HT. 2 Archaeological Assessment (page 55)</p>	<p>The requirement for an archaeological assessment to be provided for all new development is onerous. Any requirement for an archaeological assessment is set out on Hampshire County Council’s website - http://documents.hants.gov.uk/sold-services/sharedexpertise-capabilitystatement-Archaeology.pdf Hampshire Archaeology are notified of applications where their planning constraint maps show an archaeological alert and so are assessed on a case by case basis. It is unnecessary to include this as a policy in the TNP and as such this policy should be either be deleted or amended to meet the above requirements.</p> <p>In addition, the term ‘merited’ could not be applied to a planning application with precision.</p>	<p><i>“Policies should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It</i></p>	<p>Advise making the recommended amendments.</p>

		<i>should be concise, precise and supported by appropriate evidence”</i> (Paragraph 41, Ref 41-041-20140306 of the PPG).	
Tasks HT.2 – HT 5.4 (pages 56 and 57)	If the Forum wish to pursue Tasks HT2.2 and HT 5.1 it is suggested that they contact FBC. In addition, the Forum should note that any aspirations related to non-land use matters should be set out in a companion document or annex as stated in the PPG. Further clarification should be provided on all tasks listed within Chapter 12 – Historic Environment in terms of how these will be delivered.		Advise making suggested amendments.
Chapter 14 – Monitoring and review (page 58)	A quote is provided from a Locality document in respect of the implementation of neighbourhood plans. The Council undertakes monitoring of neighbourhood plans following their ‘making’.	Regulation 34(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that, <i>“Where a local planning authority have made a neighbourhood development order or a neighbourhood development plan, the local planning authority’s monitoring report must contain</i>	Advise that the TNP refers to the LPA undertaking monitoring of the Neighbourhood Plan in the Authority Monitoring Report (AMR).

		<i>details of these documents</i>	
Appendix 18 – The History of Titchfield	There are a number of claims and statements made within this Appendix about the history of people, places and events. The Council’s Conservation Officer considers that there should be rigorous evidence to support these claims.		Advise providing evidence to support the claims/statements in Appendix 18.
Appendix 35 – Natural Environment	<p>Reference is made to the Solent and Brent Geese Strategy 2010. There is a more recent document that has been published (see comments on Task E.4 above) ‘Solent Waders & Brent Goose Strategy 2019: Interim Project Report: Year one (October 2017)’.</p> <p>Therefore, the LPA suggest that a reference is made to inform of the Interim Report, new classification system, 2017 current use mapping and the new (draft) Mitigation Guidance which have been considered since March 2018 for decision making by Natural England and Fareham Borough Council.</p> <p>Page 3, Paragraph 4 of Appendix 35 refers to ‘seroline’ to be changed to ‘serotine’. The use of ‘pipistrelle’ and ‘long-eared’ should be re-considered. Pipistrelle is a general term used and there are 3 species of pipistrelles including common, soprano and Nathusias. Similarly, long-eared is a general term and there are 2 species including brown and grey long-eared bats. Therefore, long eared and brown long-eared bats cannot be counted as two different species; similarly, pipistrelle and soprano pipistrelle cannot be counted as two types of bats.</p> <p>Page 3, Paragraph 5 of Appendix 34 refers to ‘Protected amphibians and reptiles’ to be changed to ‘Protected/notable’ as common frog and common toad do not receive the same level of protection as reptiles and great crested newts (not protected against killing/injuring or habitat destruction).</p>		<p>Advise making reference to the updated Interim Project Report, classification system, current use mapping and new (draft) Mitigation Guidance.</p> <p>Advise amending ‘seroline’ to ‘serotine’. Consider amending reference to the types of bat species.</p> <p>Advise amending ‘protected amphibians and reptiles’ to ‘protected/notable’.</p>

Annex 1 – General observations and suggestions

Pre-submission Titchfield Neighbourhood Plan	
Evidence	A general issue that has been identified by the LPA is the lack of appropriate evidence which could be linked to the supporting text for the policies of the TNP.
Content	It is considered that the flow of the TNP could be improved to aid clarity and overcome disjointedness.
Paragraph Numbering	It is recommended that for ease of reference that paragraph numbers are inserted in the TNP prior to submission. This will ensure the plan is clearer for the reader and may ensure that comments received for consultation on the plan are in relation to the relevant areas.
Use of Capital Letters	There should be consistency throughout the neighbourhood plan in terms of the use of capital letters, such as Country Park.
The use of Aims, Objectives, Policies and Tasks	<p>The use of aims, objectives, policies and tasks within the TNP without any supporting wording to provide additional clarification is confusing.</p> <p>Policies should be positively worded to ensure accordance with paragraph 14 of the NPPF. Avoid the use of statements in policies.</p> <p>It is suggested that a short vision statement (couple of sentences) is included in the TNP, which sets out the key policies in achieving this vision, which could be used in determining planning applications and demonstrates conformity with the strategic policies of the ALP.</p> <p>The PPG sets out that those aspirations that deal with ‘non-land use matters should be clearly identifiable and set out in a companion document or annex’. Therefore, the LPA advises that ‘tasks’ identified by orange boxes in the plan should be moved into a companion document or separate annex to the TNP. In terms of the tasks listed throughout the plan, further explanation could be included on the current status of these</p>

	projects and/or how these will be delivered by the Forum.
Photos, Images and Maps	Improve the resolution of some of the photos, images maps in the Plan. In addition, all maps should have a key provided and should cover a full size of A4 to provide clarity and precision. This will aid ease of referencing. The maps should be referenced to the supporting text and explained accordingly. All maps, images and photos in the TNP should have titles to clearly define what the map is illustrating and a figure. Furthermore, these should all have sources to provide a reference as to where the photos, maps and images were obtained, and should be clearly linked to the main body of the report.
Hyperlinks in the Plan	Ensure that either hyperlinks to Appendices in the plan operate correctly or remove these (Appendix 16 and Appendix 35).
Typos and Grammar	There are several typos throughout the neighbourhood plan, these should be reviewed and amended prior to the submission of the plan. In addition, several sentences within the TNP are unclear and confusing and should be revisited prior to submission of the plan.
Glossary of Terms	The references to FBC and TVT are acronyms rather than glossary terms and should be moved to the front of the TNP. In addition, the Forum may wish to check some of the terms against the definitions in the NPPF.
Appendices	
Typos	There are several typos throughout the appendices, these should be reviewed and amended prior to the submission of the plan.
Relevance	There are a number of appendices that do not relate to the TNP or land use matters. Further explanation should be provided as to why these appendices have been included or they should be removed from the plans evidence base.
Consultation Statement	
Timetable of Consultation Events	It would be useful if further details are provided in the 'activity' column on why the consultation events have been undertaken and what issues were discussed.
General Comments	The LPA would suggest reviewing the statement and ensuring that information is provided on when, how and why the consultation took place. Further information is required to explain the heading 'developing of vision objectives'.

	It would be useful for the statement to include results of any questionnaire/surveys undertaken by the Forum and these should be linked to relevant Appendices.
Basic Conditions Statement	
General comments	The reference to the emerging Local Plan consultation and timescales is incorrect and should be deleted.