

## Winchfield Neighbourhood Plan 2023-2037 Regulation 16 Submission – Hart District Council comments

Hart District Council welcomes the opportunity to comment on the Winchfield Neighbourhood Plan submission version. We are pleased to see that many of our previous comments have been taken into consideration. There are, however, some areas of the plan that may benefit from further clarification and these comments are set out in the table below.

These comments were agreed with the Portfolio holder for Planning Policy on 22 June 2023.

**Table 1: Detailed comments/suggestions:**

Paragraph/page/map	Comment/requested change	Reason
Para 1.7	Add' as shown on map 1 above – and Reference the Map of the Parish.	To clarify to the reader the area to which the Neighbourhood Plan relates.
Para 1.22	Insert 'to' between 'Plan' and 'comply'	Typo
Para 3.12	The word “development” has been repeated in error. The wording should read “Policy NBE1: Development in the Countryside sets out...”	Typo
Para 4.14	While we appreciate that road safety and reducing rural criminality are priorities for the Parish, we consider that this paragraph should be moved to the community aspirations chapter of the plan as it does not relate to matters that can be dealt with through the planning process.	Ensuring the body of plan only contains matters pertaining to development and the use of land.
Policy NE1: Landscape Character	1 <sup>st</sup> Para – query whether 'only' is necessary.	To clarify application of the policy for decisions makers in line with NPPF para 16d and e.

We note that following our comments at Reg14 the words 'conserve and enhance' have been replaced with 'retains and reinforces' The Hart Local Plan uses 'respect and wherever possible enhance'. 'Retains' is more specific than 'respect' as respect allows a scheme to take something into consideration but potentially do something that, for instance, contrasts, a sometimes used and legitimate design rational.

Subject to the above, Criterion a – suggest that not all development should need, or will be able to 'reinforce' the key characteristics so suggest the addition of '**where possible**' before 'reinforces'.

2<sup>nd</sup> Para - Query whether references to 'changes in the use of land' are required as 'new development' would include change of use where they were considered to be development and would need planning permission. The addition of the word "usually" into the second paragraph creates ambiguity as to when the LVIA is required.

Criterion 'e' repeats 'a'. It is suggested that the Policy could be clarified by moving criterion 'd' and 'f' to above the second paragraph to become criterion 'd' and 'e'.

Amend the second paragraph so that it relates to:

Proposals for new development '**which may have a visual impact on land outside ..**' 'should ~~usually~~ be accompanied by a LVIA **that demonstrates how the**

	<p><b>proposal meet criteria ‘a’ to ‘e’ above.</b></p> <p>It would be helpful to include a Plan showing the 6 character areas.</p>	
Policy NE1: Landscape Character	<p>The second paragraph refers to “new development outside the Defined settlement boundaries” but does not contain a reference or link to where this information can be found.</p> <p>Suggest including a footnote indicating that a map of settlement boundaries can be seen at figure 7.1.</p>	Improve legibility of the plan
Coalescence with Neighbouring Parishes para 5.23-5.26	Propose moving paragraphs relating to coalescence with neighbouring parishes to page 33 so that text supporting Policy NE1 criterion f is more easily found.	Improve legibility of the plan
Policy NE2: Protection of Key Views	<p>We welcome the addition of the larger map at figure 5.5, and figure 5.6 which summarises the landscape qualities of the views the plan seeks to protect and the inset maps identifying each view on pages 37-39.</p> <p>However, we query whether it would be more appropriate to include the inset maps in an appendix to improve the flow of the plan.</p> <p>It may be clearer to a decision maker to reorder this Policy and to move the last paragraph to the start of the Policy. We question whether it is necessary to retain the first sentence of the Policy.</p>	Improve legibility of the plan and to ensure that the Policy is clear to the decision maker in line with the NPPF para 16d and e
Policy NE3: Brenda Parker Way	We suggest that the part of this Policy relevant to the decision maker is the last sentence and question	To ensure that the Policy is clear to the decision maker in line with the NPPF para 16d and e

	whether the remainder is needed, other than adding reference to Figure 5.8.	
Policy NE4: Trees, Woodlands and Hedgerows	It might be helpful to add definitions of 'major' and 'minor' into the Glossary	To improve clarity for decision making
Dark Skies map, page 47	We welcome the addition of the CPRE light pollution map, but it is difficult to determine the locations.  Suggest that a larger map is produced or a link to the original source.	Improve legibility of the plan
Page 48	Paragraph numbering is required for the paragraphs at the top of page 48	Update
Policy NE5: Dark Skies	The inclusion of criteria to make the requirements of the policy clearer are very helpful, but it is unclear how applicants can demonstrate that the criteria have been met.  We propose adding a requirement for lighting assessments in support of proposals involving the installation of outdoor lighting.  We also suggest that 'and' is added after Criterion 'a'	To clarify application of the policy and aid decision making.
Para 5.65	Suggest that 'ecological' is added between 'the' and 'integrity' and that 'as set out in the adopted Hart Local Plan' is added at the end of the paragraph.	For clarification and to ensure that the reader knows where to source information on mitigation measures.
Figure 5.10, page 53	The key for the SPA and the 5km buffer seem to be the wrong way around.	Correction.
Policy HE1: Heritage Assets	Propose amending the wording in the second paragraph of policy to ensure conformity with HLP32.  "Proposals which lead to substantial harm or total loss of significance to a heritage	Clarification and conformity with the HLP32.

	asset <b>and/or its setting</b> will not be supported. Proposals which lead to less than substantial harm to the significant of the heritage asset <b>and/or its setting</b> will be weighed against the public benefits that might accrue from the development”.	
Para 6.42	As suggested in the Council’s response to the Reg14 version of the Neighbourhood Plan, there are no maps showing the location of the non-designated assets – reference to where these can be found should be added to Para 6.42.	To aid decision making
Policy BE1: New Development	Replace ‘are expected to take place’ with <b>‘will be supported’</b>	Clarity for decision making to ensure that the Policy is clear to the decision maker in line with the NPPF para 16d and e.
Policy BE2: Affordable Housing on Rural Exception Sites	We are pleased to see reference to the defined settlement boundaries in this Policy as suggested in our previous comments. However, the use of ‘outside and in close proximity’ could be misconstrued to still suggest that any area outside of the settlement boundaries would be appropriate. We suggest the wording should be more closely aligned with the local plan wording and reference amended to <b>‘adjoining or in close proximity to’</b> .	To ensure that the Policy is clear to the decision maker in line with the NPPF para 16d and e
Policy BE4: Development Design Considerations	Criteria a – resisting a blanket loss of all gardens is considered too broad and overly restrictive, contrary to the NPPF and HLP32. The wording included in the Reg14 Plan should be reinstated <b>‘do not involve the loss of a garden, or an open, green or landscaped area which make a significant</b>	To ensure that the Policy is clear to the decision maker in line with the NPPF para 16d and e and is consistent with the NPPF and HLP32.

	<p><b>contribution to the character and appearance of that part of the village'</b></p> <p>Criteria j – as electric charging point provision is now required by Building Regulations could add' <b>in accordance with national standards'</b></p>	
Policy BE5: Residential parking	<p>We note that this Policy replicates the parking standards in the 'made' Neighbourhood Plan and that the standards exceed those in the District Councils Technical Advice Note on Car and Cycle Parking Standards and in the emerging Parking Standards SPD which is currently out for public consultation.</p> <p>We welcome the additional evidence that has been added since the Reg14 Plan but still question how the requirements of Para 107 of the <a href="#">NPPF</a> have been taken into account.</p>	Consistency with the NPPF.
Minor Plan Updates	<p>It is noted that a number of amendments may need to be made to reflect the next stage in plan making, or the outcome of the Examiners modifications including for example to the Introduction and Foreword, and para 1.23.</p>	To ensure the Neighbourhood Plan reflects the most up to date position.

## Abbreviations

- CPRE = a countryside charity
- Hart Local Plan (Strategy & Sites) 2032 = HLP32
- Landscape and Visual Impact Assessment = LVIA