

# **WINCHFIELD NEIGHBOURHOOD PLAN 2015 - 2032**

A Report to Hart District Council on the Pre-Submission Draft of the  
Winchfield Neighbourhood Plan

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## 1. Introduction

To proceed to Referendum, a neighbourhood plan must meet the basic conditions established by legislation (set out below). This Report to Hart District Council assesses the Winchfield Neighbourhood Plan against the basic conditions – as will be the case when the Submission Version of the Winchfield Neighbourhood Plan is formally examined by an Independent Examiner. Therefore, for clarity and consistency, the comments that follow have been set out in a similar structure to an Examiner’s Report.

The overall aim of this Report is to identify areas where there may be conflict with the basic conditions and to suggest changes wherever such conflict arises. The Report also makes a number of recommendations aimed at ensuring that the Winchfield Neighbourhood Plan is as clear and helpful a statutory planning document as possible.

Individually, or together, the proposed changes do not constitute a negative criticism of the Winchfield Neighbourhood Plan or the approach taken. As presented, the Winchfield Neighbourhood Plan is an impressive document and it clear that it is the result of a major community effort. Each of the proposals in this Report are based on ensuring that the Winchfield Neighbourhood Plan can proceed to Referendum and that it does so in as similar form as possible to the version submitted for examination, whilst meeting the basic conditions.

## Background

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

*“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”*

(Paragraph 183, National Planning Policy Framework)

Winchfield Parish Council is the *qualifying body* responsible for the production of the Winchfield Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).

## Winchfield Neighbourhood Area

Further to an application made by Winchfield Parish Council, Hart District Council approved the designation of Winchfield as a Neighbourhood Area on 8<sup>th</sup> January 2015.

- **Recommendation: Add “...on 8<sup>th</sup> January 2015” to fourth paragraph, page 5**

The designation of the Neighbourhood Area satisfies a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

Plans showing the boundary of the Winchfield Neighbourhood Area are provided on pages 5 and 11 of the Winchfield Neighbourhood Plan. The Neighbourhood Area corresponds to that of Winchfield Parish, as confirmed on page 5 of the Winchfield Neighbourhood Plan.

Further to examination, the Independent Examiner can only make one of the following three recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that a neighbourhood plan should go forward to Referendum, an Independent Examiner must consider whether or not the Referendum Area should extend beyond the Neighbourhood Area to which the Plan relates. The Winchfield Neighbourhood Area follows a logical Parish boundary. It is predominantly rural and is succinctly summarised on page 6 of the Winchfield Neighbourhood Plan. There is no reason why the Neighbourhood Area should extend beyond that established.

In examining the Plan, the examiner is also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to comments made elsewhere in this Report, it is my view that the Winchfield Neighbourhood Plan meets all of the above requirements.

#### Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. This is clearly stated on the front cover – “*For the period 2015 through 2032.*” There is also a reference to the plan period on page 5 and the Winchfield Neighbourhood Plan therefore satisfies the relevant requirements in this regard.

## 2. Basic Conditions and Development Plan Status

### Basic Conditions

The Independent Examiner considers the neighbourhood plan against the “basic conditions.” These were *set out in law*<sup>1</sup> following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

Helpfully, the basic conditions are referred to on Page 5 of the Winchfield Neighbourhood Plan. Whilst it is very common for the basic conditions to be incorrectly paraphrased in neighbourhood plans, page 5 of the Winchfield Neighbourhood Plan provides entirely appropriate references.

### EU and ECHR Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal<sup>2</sup>. However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment (SEA).

With the above in mind, draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is referred to as a “screening” report, opinion or assessment. If the screening report identifies likely significant effects, then an environmental report must be prepared.

An SEA Screening Statement has been undertaken. This concludes that the Winchfield Neighbourhood Plan will not have significant effects in relation to any of the criteria set out in Schedule 1 of the SEA Regulations. As part of the screening report, the statutory consultees, Natural England, the Environment Agency and Historic England were consulted. The Screening Statement confirms that all three statutory consultees agreed with its conclusion.

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<sup>1</sup> Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

<sup>2</sup> Paragraph 026, Planning Practice Guidance 2014.

Further to the above, a Habitats Regulations Assessment (HRA) is required if the implementation of the Winchfield Neighbourhood Plan may lead to likely negative significant effects on protected European sites.

A Habitats Regulations Assessment (HRA) Screening Statement has also been undertaken. This concludes that no likely significant effects are likely to occur with regards the integrity of any European sites and that a full HRA is not required. Again, the Screening Statement confirms that all three statutory consultees have been consulted and that they agree with this conclusion. It is relevant to point out that Natural England, the Environment Agency and Historic England will also be consulted on the Pre-Submission and Submission versions of the Winchfield Neighbourhood Plan.

Hart District Council has confirmed that:

*“On the basis of the contents of the draft Neighbourhood Plan and following consultation with the relevant statutory bodies, Hart District Council has determined that an SEA or HRA assessment is not required for the Winchfield Neighbourhood Plan.”*

This is an important consideration, as national guidance establishes that the ultimate responsibility for determining whether a draft neighbourhood plan meets EU obligations is placed on the local planning authority,

*“The local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.”* (Planning Practice Guidance<sup>3</sup>)

Taking all of the above into account, along with there being no apparent impacts on the fundamental rights and freedoms guaranteed under the ECHR, or conflicts with the Human Rights Act 1998, I see no reason why the Winchfield Neighbourhood Plan would not be compatible with European obligations.

I note that the Neighbourhood Area is within 5km of the Thames Basin Heaths Special Protection Area (SPA). However, the Winchfield Neighbourhood Plan does not allocate any development land. Furthermore, saved Policy NRM6 of the South East Plan and Hart District Council’s SPA Interim Avoidance Strategy (2010) provide measures to avoid adverse impacts for developments proposing net additional dwellings within 5km of the Thames Basin Heaths SPA.

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<sup>3</sup> (Paragraph Reference: 11-031-20150209)

### 3. Consultation

At the Submission Stage, the Parish Council will need to submit a Consultation Statement to Hart District Council, to provide evidence of:

- 1) who was consulted;
- 2) how people were consulted;
- 3) the main issues and concerns raised by the people consulted; and
- 4) the outcome of consultation (and where relevant, how this was addressed in the Neighbourhood Plan.

This is to meet the requirements of Section 15 (2) of Part 5 of the Neighbourhood Planning Regulations 2012.

Whilst there is no such requirement at the Pre-Submission stage, the Winchfield Neighbourhood Plan and supporting evidence provides extensive information regarding the consultation process.

It is clear that, to this stage, the Winchfield Neighbourhood Plan has emerged through extensive public engagement and that there have been plentiful opportunities for people to comment.

This is a fundamental consideration, as consultation provides the process through which a community can develop a shared vision for their neighbourhood and deliver the sustainable development they need, in accordance with Paragraph 183 of the National Planning Policy Framework (NPPF).

As a consequence of the extensive consultation undertaken, there is significant evidence to demonstrate that the Policies of the Winchfield Neighbourhood Plan reflect the views of the community.



#### **4. The Neighbourhood Plan – Introductory Sections**

The Policies of the Neighbourhood Plan are considered against the Basic Conditions in part 5, below. This Chapter briefly considers the introductory sections of the Neighbourhood Plan.

The overall design of the Neighbourhood Plan is excellent. The Policies are clearly separated from the main text and the use of photographs and plans provides for significant visual interest.

##### Contents and Foreword

The contents page is clear and concise. The Foreword is interesting and emphasises the importance of community involvement. No changes recommended.

##### Introduction and Background

The remainder of Chapter 1 provides helpful and interesting background information relating to the creation of the Winchfield Neighbourhood Plan and to the geography of the Neighbourhood Area. No changes recommended.

##### Vision

The Objectives, Vision and supporting information reflect the community's wish to provide for sustainable development whilst protecting the distinctive features of the Neighbourhood Area. The importance afforded to the Neighbourhood Area's rural attributes comes across clearly in Chapter 2. No changes recommended.

Chapter 3 goes on to summarise the consultation process. No changes recommended.

## Housing Need for Winchfield

The opening section to Chapter 4 states that the “*starting point for determining housing numbers*” is the draft Local Plan. This is confusing and inappropriate. The draft Local Plan is simply that – it has not undergone rigorous examination and consequently, its Policies are subject to significant change and do not comprise “*a starting point.*”

It would be more accurate and appropriate to state that, in preparing the Winchfield Neighbourhood Plan, plan-makers have taken into account available up-to-date information relating to housing, housing need and the provision of housing land. This has included relevant information relating to the emerging Hart Local Plan. Consequently, I would suggest:

- **Change second paragraph on page 17 to reflect the above**

Further to the above, the first sentence of the third paragraph on page 17 is misleading. It follows on from the previous paragraph and suggests that there is, within a Local Plan, an established Objectively Assessed Need (OAN) for Hart, which is not the case. The end of this paragraph contains a “*messy*” web link, which will rapidly become out of date over the plan period. I suggest:

- **Retain reference to the October 2015 Five Year Supply document and reference it in a footnote or similar. Delete the rest of the third paragraph on page 17. Introduce the following “calculations” as being based on the most up to date relevant information available.**

The information set out on page 19 is clear and provides an appropriate and logical commentary with regards how plan-makers have given consideration to housing related matters.

Whilst I note that the emerging Hart Local Plan suggests that the Neighbourhood Area could potentially be suitable for a new settlement<sup>4</sup>, there is no requirement for the Winchfield Neighbourhood Plan to be in general conformity with emerging plans. Further, it is clear that such an allocation would impact on the Neighbourhood Area’s distinctive attributes identified in Chapter 2.

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<sup>4</sup> Hart District Local Plan Refined Options for Delivering New Homes (February 2016)

## 6, Neighbourhood Plan Policies

### Housing

#### **Policy A1: Housing Preference for People with a Strong Connection to Winchfield**

This is not a land use planning policy that the Neighbourhood Plan can control. It represents an aspiration of the Parish Council and this should be reflected by the Policy being deleted and replaced by a “Community Action” or “Watch Point,” whereby the Parish Council will seek to encourage local occupancy.

Further to the above, it is not clear why say, someone who has not lived anywhere near the Parish for 50 years but who has a child living there, has a stronger local connection than someone who has lived adjacent to the Parish boundary for 50 years and whose parents and children have lived in the Parish for the last nine years. The “strong local connection” criteria are arbitrary.

- **Delete Policy A1 and replace with a Community Action or Watch Point**

#### **Policy A2: Size and Location of New Developments**

Whilst the aspirations of Policy A2 are acknowledged, it is unclear how the Policy would work in practice. For example, the Policy does not anticipate separate applications for seven houses on sites adjacent to one another. Further, the phrase “*wherever possible*” is undefined and thus, it is not clear to an applicant or a decision-maker as to when it would not be possible to develop up to seven homes.

Further to the above, agricultural buildings take all kinds of shapes and forms. It is unclear why preference would, in all instances, be given to the redevelopment of disused agricultural buildings. This may result in support for inappropriate forms of development. As worded, the Policy would give preference to the redevelopment of “*other commercial buildings*.” The village pub is a commercial building. Consequently, this Policy would conflict with Policy AW1.

The final part of Policy A2 is not a land use planning policy. It simply comprises a statement.

- **Change wording of first paragraph of Policy A2 to something along the lines of “...of the village and should not result in a new development of more than seven homes. The appropriate redevelopment of disused buildings will be supported.”**
- **Delete second paragraph of Policy A2**

### **Policy A3: Infill Development**

I note that “curtilages” are not always straightforward and can raise all kinds of legal matters. I would strongly discourage use of the word “curtilages” in a land use planning policy. Notwithstanding this point, Policy A3 is ambiguous due to the use of the phrase “may be appropriate” – which fails to provide applicants and decision makers with clarity. Furthermore and fundamentally, it may result in harmful development, especially in the open countryside.

As worded, Policy A3 considers that building four homes in a garden – anywhere in the Neighbourhood Area - “may be appropriate.” No substantive evidence has been provided to substantiate such an approach, which fails to reflect either national policy or the adopted policies of the development plan.

The recommendation below takes account of the fact that the adopted Local Plan appropriately controls infill development.

- **Delete Policy A3**

### **Policy A4: Residential Car Parking Spaces, Gardens and Utility Space**

If Policy A4 is to set out a different approach to car parking requirements to that in Hart’s Interim Guidance (2008), then it should do so on the basis of clear, detailed evidence. This should set out why Hart’s Interim Guidance is inappropriate and why the new proposed approach is appropriate.

Hart’s Interim Guidance is an adopted policy document and is based on detailed evidence. It is not clear on what basis it is appropriate for a five bedroomed house to provide six car parking spaces, as would be required by Policy A4. Further, there is no evidence to demonstrate that it is viable, or appropriate, for all one bedroomed flats to provide two car parking spaces.

It is possible to have a single, detached “garage block,” but that is not what the Policy is trying to prevent. For clarity, the term “garage blocks” should be defined. Further, “garden implements” is not defined. There is no national or local policy requirement to provide space for garden implements. Not all households have, nor require, garden implements and in any case, there are many different ways of storing such things.

It is not clear how refuse and recycling bins for flats can be provided within the curtilage of each dwelling.

- **Provide relevant evidence to justify the conflict with Hart’s Interim Guidance**
- **Define “garage block”**
- **Delete reference to “garden implements”**
- **Delete “within the curtilage of each dwelling”**

#### **Policy A5: Height and Type of Housing**

Policy A5 sets out clear design guidelines. It has regard to the NPPF, which protects local character and contributes to the achievement of sustainable development.

**No changes proposed.**

#### **Policy A6: Design**

Good design is recognised by national policy as comprising

*“a key aspect of sustainable development...indivisible from good planning”*  
(Paragraph 56, NPPF)

In addition, national policy requires good design to contribute positively to making places better for people (Chapter 7, The Framework) and Hart Local Plan Policy GEN1 supports development that is in keeping with local character.

Policy A6 has regard to national policy and is in general conformity with Local Plan Policy GEN1.

**No changes proposed.**

### **Policy A7: Density**

Local Plan Policy RUR20 seeks to prevent the density of new development from harming local character. In so doing, it aligns with Local Plan Policy RUR20, referred to above.

Policy A7 provides a locally distinctive layer of detail to these strategic local policies. Taking into account the character of the Neighbourhood Area and with specific reference to a recent development, it sets a maximum density level considered to be appropriate to Winchfield.

Taking the above into account, Policy A7 contributes to the achievement of sustainable development.

**No changes proposed.**

### **Policy B1: Rural Look and Feel – Significant Views & Topography**

Whilst national and local planning policy protects local character, it does not provide or protect a “right to a view.” Consequently, land use planning policies relating to key vistas, intrinsic to local character, need to be carefully and appropriately worded.

Page 36 of the Winchfield Neighbourhood Plan identifies eight significant views. However, Policy B1 is far more ambiguous and simply refers to “*key features of rural views or views in the vicinity of sites of special interest.*” Such views are not defined and consequently, the Policy fails to provide an applicant with clarity and does not provide a decision maker with a clear indication of how to respond to a development proposal, contrary to NPPF Paragraph 154.

The Policy should refer specifically to those significant views identified in the Winchfield Neighbourhood Plan.

The second part of the Policy refers to a map of relevant hedgerow(s), woodland and trees. It is not clear what map this refers to. More particularly, the Policy itself does not relate to the map, but simply seeks to protect every tree. Not all trees are necessarily worthy of protection and there is no substantive evidence to demonstrate that this is not the case in the Neighbourhood Area. Further, ancient woodland is protected and it is not clear in what circumstances it would form part of an acceptable new development. This part of the Policy is confusing.

The Parish Council is not a utility provider and the Neighbourhood Plan cannot control the provision of utilities. The third part of Policy B1 is beyond the control of

the Neighbourhood Plan. This would be better placed within a Community Action or Watch Point.

- **Change first paragraph to something along the lines of “Development should not result in a loss of, or harm to the significant views identified on page 36 of the NDP.”**
- **Change second paragraph to something along the lines of “Hedgerows, mature trees and ancient woodland are valued...new developments.”**
- **Delete reference to map, or provide a specific, relevant reference.**
- **Delete third paragraph and replace with a Community Action or Watch Point**

### **Policy B2: Rural Look and Feel – Lanes and Public Rights of Way**

The first part of this Policy is a matter for the Highway Authority.

The second part of the Policy is unduly onerous and unjustified. There is no reason for example, why a household extension should “*provide adequate provision of public rights of way to ensure that pedestrians and other social road users*” can access the network of village lanes. Further, there is no evidence that it would be viable, possible, or appropriate for any form of development to achieve this requirement.

No indication is provided with regards when, or where, it will be “necessary” to create new public rights of way. Consequently, the Policy fails to provide clarity.

However, Chapter 9 of the Framework seeks to promote healthy communities. In this regard, national policy states that:

*“Planning policies should protect and enhance public rights of way and access.”*  
(Paragraph 75)

It is therefore worthwhile to reconsider the content of Policy B2, with the intention of providing a Policy that meets the basic conditions and reflects the community’s regard for its public right of way network.

- **Delete first paragraph**
- **Replace second paragraph. Possibly on the following basis, “*The improvement of existing public rights of way will be supported. The***

*provision of new public rights of way that respect local character will be encouraged.”*

### **Policy B3: Local Gaps**

Policy B3 appears to arbitrarily designate Local Gaps, which development “will be expected to avoid.” This Policy is very different to and is not in general conformity with, Local Plan Policy CON21, which refers to Local Gaps elsewhere in Hart, where development that would lead to coalescence or damage the separate identity of neighbouring settlements will not be permitted.

Policy B3 does not seek to achieve this, but simply expects development to avoid areas shown on a plan entitled “*Mapped Local Gaps in Winchfield.*” Policy B3 fails to meet the basic conditions.

Further to the above, there is an absence of substantive information demonstrating why specific parts of the Neighbourhood Area have been designated as Local Gaps; and little indication to set out how an application for development in such a Local Gap would be considered.

### **Delete Policy B3**

### **Policy B4: Local Green Space**

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. Paragraph 76 states that

*“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.”*

Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land. Notably, the Framework is explicit in stating that

*“The Local Green Space designation will not be appropriate for most green areas or open space.”* (Para 77)



Taking the above into account, if designating Local Green Space, plan-makers need to demonstrate that the requirements for its designation are met in full. These requirements are: that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

The Winchfield Neighbourhood Plan seeks to designate one area of Local Green Space. This comprises the “Three Castles Path, Talbothays Farm Section.” However, no clear plan is provided, in either the Winchfield Neighbourhood Plan or the Evidence Base, to show the specific boundaries of the site to be designated as Local Green Space. This is inappropriate.

If Policy B4 seeks to designate a Local Green Space, then it needs to show, on a clear map, the specific boundaries of the designation.

The wording of Policy B4 does not have regard to the NPPF, but rather, sets out a vague reference to Local Green Space that has not been designated. Such an approach is inappropriate.

- **Provide a map showing, clearly, the boundaries of the Local Green Space**
- **Subject to the Talbothays Farm Section of the Three Castles Path not comprising an extensive tract of land, delete Policy B4 and replace with “A Local Green Space has been designated, as shown on the Map below. No development will be permitted, other than in very special circumstances.”**

#### **Policy B5 – Light Pollution**

The Neighbourhood Plan does not control the provision of street lighting or security lighting.

- **Delete Policy and replace with a Community Action or Watch Point.**

### **Policy C1: Local Ecology, Wetlands and Flood Risk Areas**

Paragraph 109 of the Framework states that:

*“The Planning system should contribute to and enhance the natural and local environment...”*

It goes on to promote the provision of net gains in biodiversity, where possible, *“by establishing coherent, ecological networks that are more resilient to current and future pressures.”*

Policy C1 refers to *“the local ecology.”* This is too broad a reference to provide a meaningful and controllable land use planning policy.

The NPPF sets out a detailed approach to the consideration of development in areas at risk of flooding. There is no national or local policy requirement to strongly resist any form of development in any area at risk of flooding. No substantive evidence is provided to justify conflict with national and local policy in this regard.

Similarly, it is inappropriate to *“resist”* all development that might impact the flooding of habitats. Such an approach could potentially prevent any form of development anywhere.

There is a lot of relevant supporting information to Policy C1. It would be beneficial to seek to create a more positive, biodiversity-focused Policy, making best use of the detailed information provided.

- **Policy C1 – change wording to reflect national policy**
- **Remove references to “might” and ensure that significantly different land use designation are not treated in identical ways where it is inappropriate to do so**
- **Appropriate wording might comprise something similar to *“Development proposals that impact on local wildlife and habitats should demonstrate how biodiversity will be protected and enhanced. Development should retain and where possible, enhance, existing watercourses, wetlands, ponds, copses, woodlands, mature native trees and hedgerows. The creation of new habitats and new linkages between open spaces and habitats will be supported.”***

## **Policy D1: Historic Environment and Heritage Assets**

The NPPF recognises that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance (Paragraph 126). It establishes a clear and detailed approach to the conservation of the nation's heritage assets.

Policy D1 does not have regard to national policy. It is unclear why the Policy refers to "*physical access*" to heritage assets, or on what basis this should be protected. It also seeks to "ensure" that development is not "*detrimental to the surrounding landscape setting*." The Winchfield Neighbourhood Plan protects landscape character elsewhere.

Altogether, Policy D1 is very confusing and does not meet the basic conditions. As with the preceding Policy in the Winchfield Neighbourhood Plan, there is a significant amount of relevant and interesting information relating to the Neighbourhood Area's heritage assets. Given this, it would be unfortunate not to include a heritage policy.

- **Delete Policy D1**
- **Replace with something along the lines of "*The conservation and/or enhancement of Winchfield's heritage assets and their settings will be supported.*"**

### **Policy E1: Development Access**

Policy E1 effectively prevents the creation of new access points, without stating that this is purpose of the Policy. This results in a cumbersome approach, whereby the Policy requires something to take place without there being substantive evidence to demonstrate that the requirement is possible, appropriate or achievable.

Further, if an application for development is submitted, it needs to be considered. The Winchfield Neighbourhood Plan cannot prevent something from being considered. In this regard, impact on local character may involve subjective points of view. Due consideration is therefore important.

If the Policy is to meet the basic conditions, it needs to be re-worded. However, its purpose is unclear and consequently, no wording is proposed.

- **Re-word Policy E1**

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