

Southwick Parish Council
For Attn: John Eaton
Southwick NDP Steering Group

Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Via: email and cc to Clerk

19 October 2020

Dear John,

Southwick Neighbourhood Development Plan Regulation 14 Draft, June 2020

Thank you for consulting Wiltshire Council on the draft Southwick Neighbourhood Development Plan (referred to subsequently as the draft 'SNDP') and agreeing a short extension of time for responding.

The publication of the draft SNDP is welcomed and together with the accompanying documents illustrates the considerable commitment of the local community to prepare the Plan. In this regard, the Parish Council are clearly planning positively for their area.

In commenting on the SNDP, our primary focus is to help ensure that the Plan generally conforms with the strategic policies of the adopted Wiltshire Core Strategy (January 2015); its policies will be effective in achieving their stated objectives when applied to the determination of individual planning applications within the Parish; and its policies are consistent with national policy and avoid duplications. The comments below take into consideration the views of specialist officers in the Council and are intended to help ensure conformity with basic conditions and strengthen the SNDP.

As you will be aware, the representations received through this Regulation 14 consultation provide you with the opportunity to review your Plan and make any appropriate changes before submission. In this regard, it is worthwhile reviewing the basic conditions that the Plan must comply with at the examination stage and therefore take the opportunity to consider whether the Plan and supporting evidence could be improved to address these. We have made some initial comments against the basic conditions before providing more detailed comments on the Plan.

The Basic Conditions

For context, the independent examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The basic conditions¹ are:

- **Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan**

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

This means that the neighbourhood plan must be in accordance with national policy objectives, such as the National Planning Policy Framework (NPPF)

- **The making of the neighbourhood plan contributes to the achievement of sustainable development**

This means that the neighbourhood plan must demonstrate how it 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'). To demonstrate that a neighbourhood plan contributes to sustainable development, sufficient and proportionate evidence should be presented on how the plan guides development to sustainable solutions. This can be set out within the neighbourhood plan itself, or in the Basic Conditions Statement that will also be submitted alongside the neighbourhood plan.

- **The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area**

This means that the neighbourhood plan must not create a conflict with the strategic aims and policies of the Wiltshire Core Strategy.

- **The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations**
- **Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.**

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans and was brought into effect on 28 December 2018. It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check² whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

The examiner must also consider whether the draft neighbourhood development plan is compatible with human rights.³

² Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act

³ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

Neighbourhood Development Plan period covered

The current pre-submission draft of the SNDP covers the period 2016 to 2026, whereas the previous draft of the SNDP i.e. the screening draft, covered the period 2018-2026. It is not evident why the current draft of the SNDP has been backdated to 2016, which is two years before the screening draft was actually produced.

At paragraph 1.4 of the SNDP it acknowledges that the Wiltshire Local Plan review is based on a plan period that covers the period 2016 to 2036. On reflection, we consider that as 2026 is now only a relatively short time away, neighbourhood development plans are supposed to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years, and the policies of the neighbourhood development plan are capable of enduring longer, it would seem sensible to extend the plan period to match Wiltshire Local Plan review and that is our recommendation. In addition to this, updated evidence will also be prepared in support of the Local Plan review that may be pertinent to the preparation of your neighbourhood plan – e.g. the revised forecasts of strategic housing need.

Policy context

The policy context for the Southwick Neighbourhood Development Plan 2016-2026 is as follows:

Development Plan

Wiltshire Core Strategy (WCS), January 2015
Wiltshire Housing Sites Allocations Plan (WHSAP) (adopted February 2020)
Saved policies in the West Wiltshire District Plan 1st Alteration (2004)
West Wiltshire Leisure and Recreation DPD (2004)

Emerging Plans

Wiltshire Local Plan Review (Early stages - Regulation 18 consultation carried out November 2017)

Other relevant policy and guidance

National Planning Policy Framework (NPPF), February 2019
Planning Policy Guidance (PPG)
The Trowbridge Bat Mitigation Strategy SPD (adopted February 2020)

The recognition of the strategic policy context, particularly the Wiltshire Core Strategy (WCS), is set out in Section 3 and the reference throughout the Plan to relevant policies is welcomed.

Of particular relevance, as recognised in the SNDP, is the spatial strategy for the Trowbridge Community Area, within which Southwick Parish is located, as set out in Core Policy 29. This identifies Southwick as a Large Village. It also identifies specific issues to be addressed in planning for the area, along with indicative figures for the delivery of housing in the Community Area for the period 2006 to 2026.

The acknowledgement that the WCS is under review (as set out in Para 3.6) and recognition that the SNDP may need to be reviewed and updated to cover the period to 2036 should be included.

General comments

The comments that follow identify areas that should be addressed when considering appropriate changes to be made to the draft Plan following the consultation period. These comments also take into consideration the views of specialist officers in the Council. We would welcome the opportunity to discuss the contents of this letter when you are in a position to do so.

It is considered that the SNDP is generally set out in a logical and easy to use manner.

1: Introduction

See comments in Neighbourhood Development plan subsection above.

3: The Planning Context

It could be noted under para 3.8 that the WHSAP also includes allocations - H2.1 and H2.2 which are also within the Trowbridge Community Area and are close to the parish boundary.

Section 5: Southwick Parish Context – A Portrait of Southwick

To provide further context for the SNDP, it would be helpful if a map could be produced to show the village. The map should include any listed buildings, as well as designated and non-designated heritage assets. The map could usefully explore the setting and significance of principal landmarks such as the Church and School where these contribute to the sense of place, the nearby Western Wiltshire Green Belt, Southwick Country Park and green/blue infrastructure including public rights of way. Finally, the map could usefully illustrate proposed neighbourhood plan policies.

Wiltshire and Swindon Historic Environment Record (HER) has been accessed and listed as an evidence base. It is good to see a clear acknowledgment of the NPPF which mandates 'Conserving and enhancing the historic environment' and that character and heritage are discussed in section 5: 'Portrait of Southwick'.

It is clear too, that there has been consideration of archaeology and historic character in the draft Plan as NDP Objectives 2 and 3 refer to character and Objective 6 refers to the protection of the local historic environment. It would be recommended that a slightly more significant emphasis is set out in the document on the positive role archaeology (in the form of heritage assets) and historic landscape can play with regard to place making, retention of local character and also in the arena of leisure and wellbeing. The only heritage assets mentioned are those with designated status (registered parks, listed buildings and scheduled monuments), but there may well be other heritage assets (designated or non-designated) that merit protection or enhancement, or contribute to the feel of the village/parish.

Similarly, there are some strong sections on landscape and landscape character, but maybe more consideration could be given to the historic context of those landscapes – i.e. which elements of the past can be discerned in the present day and have influenced Southwick as it exists today?

Whilst there is no need to alter the SNDP objectives or policies greatly, maybe there just needs to be a slight alteration to the content, or stronger reference to the supporting evidence base in respect of heritage? This could be in the form of referring to the content contained in the Strategic Environmental Assessment (SEA) produced by AECOM or through directly using the data held by the Wiltshire and Swindon Historic Environment Record (HER).

From an archaeological point of view, the potential impact of development upon the archaeological resource within the parish has not been addressed in a broad enough context. In Section 5 – Historic Background, there is an over emphasis on built heritage and no discussion of the sub-surface archaeological heritage of the area

It is noted that reference is made to the Rural Housing Needs Survey report and its findings which identify a need from 8 households. The SNDP recognises that that the survey represents a 'snapshot' in time and will not cover all affordable housing needs. For this reason, the draft Plan should also acknowledge that reference to the Council's Housing Register and the HomeBuy Agents Register are also key reference points when considering affordable housing need. This could be included in Paras. 5.13, 10.2 and 10.8.

For information, as at July 2020 the Council's Housing Register highlights an affordable housing need for Southwick from 10 households (2 x 1 bed homes; 7 x 2 bed homes; 1 x 3 bed home). Included within these 10 households is an 'Adapted need' from 1 household for a 1-bedroom property. Some

of these households may have also responded to the Rural Housing Needs survey but it is highly unlikely that all 10 households were captured by the survey. We note that the draft Plan highlights that a minimum of 8 affordable homes are required (i.e. those captured by the survey), but this may well need updating before submission to reflect the most up-to-date position.

This is also the opportunity to advise that Wiltshire Council's Housing department is currently in the process of developing a strategy to deliver 1000 new affordable council houses across Wiltshire. Should you wish to discuss your proposals for the sites you have allocated for development in Southwick, we would be keen to work with you to deliver affordable housing to meet the local need.

There are no requirements within the draft Plan for compliance with the NPPF or Core Policy 67 in terms of managing and responding to flood risk from all sources. It might be helpful to include information on what we will need in terms of flood risk in support of any applications going forward.

Section 7: Vision and Objectives

It appears that the draft Plan sets out a clear vision for the plan period. The vision and objectives have been prepared following community consultation. However, as we have recommended that the plan period be aligned with the Local Plan review horizon of 2036, we would suggest that time is taken now to ensure that the submission version of the SNDP presents a Vision and set of Objectives that will ensure the Plan is capable of enduring up to and beyond 2036

In Section 7 – Vision and Objectives: SNDP Objectives, point number 6 makes a commitment to protect the local historic environment through 'ensuring high quality, locally relevant design in all new development'. Again, this appears to be focusing on the built heritage of the parish, with no mention of how below ground archaeology may be preserved from the potentially harmful effects of development. In the various policies that are set out in the subsequent sections, consideration of the impact of development upon archaeological sites is only mentioned in Policy 5b. We feel it would be useful to include this aim in all policies that will involve construction or development that may lead to significant ground disturbance.

Section 8: Policies

Policy 1: Landscape Setting Gap

The Landscape Setting Gap is understood to be a multifunctional gap that reflects the Country Park, setting of heritage assets and the requirements of the Trowbridge Bat Mitigation Strategy (TBMS). Crucially the supporting text identifies that the gap also has the function to prevent coalescence and preserve the distinct identity of the village. We support the approach taken.

Policy 2: Biodiversity and Bat Conservation

There is a discrepancy between the title of Policy 2 as cited on page 16 in Section 8, and the heading of the policy against the policy text on page 21, with the former calling it *Policy 2: Biodiversity and Bat Conservation* and the latter calling it *Policy 2: Bat Conservation*. Given that the policy solely focuses on bats, perhaps the title of the policy as given on page 21 is the correct title. The same title for Policy 2 should be used throughout the draft Plan for purposes of clarity and consistency.

The wording of Policy 2 does not accord with the recommended wording put forward by the Council's ecology team in the previous iteration of the Habitats Regulations Assessment (HRA) as it still omits reference to the whole plan area (aside from the settlement) being within the TBMS' medium risk zone; instead it specifies that it lies in zones of sensitivity but does not clarify further. We consider that this needs to be amended before the Plan reaches the submission stage.

It may be that as the policy seeks to re-iterate Wiltshire Council's policy position and the TBMS it is a policy that could be deleted from the plan.

Policy 3: Southwick Country Park

Paragraph 9.15 needs to be corrected – Hope Nature Centre is now leased to and run by Fairfield Farm Trust (FFT) not the original Hope Nature Centre Charity. The FFT is a registered charity providing educational and work experience opportunities to young adults with learning disabilities, thus providing them with the opportunity to learn new skills to help secure employment. More information on their work can be found at www.ffc.ac.uk. The site itself, which extends to approximately 15 acres, is still known as the Hope Nature Centre and is illustrated (outlined in red) on the relevant plan. Alongside its charitable objectives the site provides a fun, educational and affordable day out for local families with a family ticket for entry costing less than £20.

It is likely that some further modest and in keeping development will be required to support the use of the site for both educational and recreational purposes and this needs to be recognised in the plan. It might be best done by differentiating the Hope Nature Centre site within the Southwick Country Park. Policy 3 should be amended to reflect the existing and future educational with the addition of the text underlined and in italics as below:

“Southwick Country Park, as shown shaded on Map 2, will be protected from development for uses other than recreational and educational and enhanced for recreation and wildlife where possible. Proposals to sustain or extend the viable use of the Southwick Country Park and the development of new recreational and educational facilities, signage, maintenance and ancillary uses to meet local visitor and educational user needs and to enhance biodiversity will be supported providing that...”

Policy 4: Local Greenspace

The supporting text to Policy 4 rightly draws attention to paragraph 100 of the National Planning Policy Framework which lists the criteria a ‘green space’ must meet in order to be designated a Local Green Space. The policy looks at several areas, Southwick Country Park, The Playing Fields and The Baptist Church Cemetery, which are clearly identifiable on Map 6.

Section 9.20 proposes Southwick Country Park, including the Hope Nature Centre site as a Local Greenspace. Southwick Country Park is an extensive tract of land. It is felt that the Hope Nature Centre site should be excluded from this designation as it is a ringfenced facility which is let to and managed by a third party. Therefore, it is not directly benefitting the local community in the way envisaged by the Local Greenspace designation. It is distinct in its visual form from the remainder of the Southwick Country Park and has already been subject to appropriate development reflecting its educational and recreational use. Moreover, Policy 4, which applies to Local Green Spaces, is likely to be incompatible with the need to undertake further appropriate development of the Hope Nature Centre site in relation to its educational and recreational use. The inability to undertake further appropriate development would adversely impact the ability of the occupying charity to provide their vital services and to provide the local community with a high quality, affordable recreational facility. We therefore recommend that Policy 4 is amended.

Policy 5: Sites for New Homes

Policy 5a: Heli-beds site, Frome Road

Policy 5a is considered to largely replicate Core Policy 57 alongside other WCS policy requirements. As there is no need to repeat higher-order policies, it is therefore considered that further consideration could be given as to whether the policy could be made more locally distinctive and present more detailed design requirements that would reflect the character of the village properties that line the A361 in the immediate vicinity of the site (Appendix 1: Possible design requirements for Policy 5a).

A small point of detail for bullet point 2, there should be also sufficient car parking and turning facilities provided within the site as individual access points with reversing and turning on to the A361 will not be acceptable in highway safety terms. The volume of traffic and policy priority relating to the status of the A361 would restrict numerous access points being created and

reversing on the highway for new proposals (see the guidance in the Design Manual for Roads and Bridges and seek guidance from the Council's Sustainable Transport Team).

Policy 5b: Land off Wesley Lane

It is welcomed that the plan recognises the importance of redevelopment of an existing brownfield site. A typo within the title of the policy, it should read 'Land off...' and a bracket is present at the end of the first paragraph.

This policy (previously Policy 3) hasn't been revised to fully incorporate the recommendations put forward by the Council's ecology team in the previous iteration of the HRA. It is recommended that this is addressed before the submission stage to enable further HRA work to favourably conclude on matters that will form the basis of any subsequent Appropriate Assessment.

The opening paragraph of the policy states that the Parish's housing needs are considered in determining the type and size of the open market homes. The tenure and size of the affordable homes will be based on demonstrable need at the time of any subsequent planning application, in line with Core Policy 45 of the WCS. As such, the supporting text should make it clear that the Housing Need Survey presents only a snapshot of need and therefore may not be the only source of information used to determine need at the time of application.

This seems a little more site specific but is still fairly similar to the generalisms of Core Policy 57. A drawn plan of the site could really help give the generic principles a specific application, thus better securing them once a developer gets involved. Further recommendations can be found in Appendix 2: Possible design requirements for Policy 5b.

If the local community wishes to be involved in the delivery of this site and take on the long-term stewardship of the Affordable Housing, then forming a community land trust is a mechanism to do this. A less onerous approach is for a community group to work with a developer and/or housing association in partnership. If either of these approaches are favoured, reference to housing development being community led can be incorporated in the plan and to the housing policy and more information and support is available from the Wiltshire and Swindon Community Led Housing Hub (Homes of Our Own). I have composed the following paragraph as an example of how community led housing could be secured in this Neighbourhood Plan, as part of one or more of the housing policies.

To assist in the delivery of the Plan, consideration will be given to Community Led Housing and the formation of a Community Land Trust (CLT) for Southwick Parish. Membership would be open to all who live and work in the parish and the CLT's purpose would be to sustain, enhance and embrace the village community. The CLT could undertake small scale development(s) of self-build/custom-build homes/low cost homes for sale and/or affordable homes for rent during the plan period. The CLT could also partner with a developer to bring forward housing where there is a proven need.

The above could also be applied to Policy 5a: Site Allocation: Heli-beds site, Frome Road and Policy 6: Additional Housing Development.

In addition to the above I would like to mention that a CLT can also be the mechanism to deliver and take ownership of a community business, such as a village shop, post office and or public house (reference Policy 7: Retail services and facilities) and if the community would like support with establishing as community business Wiltshire Community Land Trust and The Plunkett Foundation may be able to provide assistance.

At a more technical level, the supporting text, paragraph 10.20, could be expanded to guide the user of the Plan in respect of the requirement for SuDS to provide for at least 1 metre (freeboard) above the top level of groundwater taking into account seasonal variations. Again, such matters will need to follow guidance from [CIRIA](#) and the [Wiltshire Council's own Groundwater Strategy](#).

Reference should therefore be made in the supporting text to Wiltshire Council's [Surface water soakaway guidance \(page 5\)](#) in which it says: "A minimum of 1m clearance between the base of the soakaway and the maximum groundwater level is required, taking into account seasonal variations. This is to prevent rising groundwater from reducing the available storage capacity within the soakaway, to ensure a sufficient depth of unsaturated material, and to protect the groundwater from contamination."

Policy 6: Housing Development

Policy 6 is considered to largely replicate Core Policy 2 alongside other WCS policy requirements. As there is no need to repeat higher-order policies, it is therefore considered that there may be no need for Policy 6, but further consideration could be given as to whether the policy could be made more locally distinctive.

The policy wording makes an incorrect reference to Policy 2 (the Bat Conservation policy). Presumably Policy 6 should be referring to Policy 5a and 5b? As such, this should be corrected. Also, the recommendations put forward in the last iteration of the HRA haven't been wholly implemented. The previous recommendation was that: *'The wording in Policy 2 should be amended to clarify that windfall developments will only be supported where they come forward within the Southwick Village settlement boundary.'* Whereas the policy now states: *'Proposals for infill development outside of the sites identified by Policy 2 will be supported if they are within the Southwick Limits of Development defined by the Wiltshire Core Strategy and Housing Site Allocations Plan and where such development...'* It is suggested that the policy is amended to use the accepted terms 'windfall development' rather than 'infill development', and 'settlement boundary' rather than 'limits of development'.

Policy 7: Retail and Services

Policy 7 is considered to largely replicate Core Policy 49 alongside other WCS policy requirements. As there is no need to repeat higher-order policies, it is therefore considered that there may be no need for Policy 7, but further consideration could be given as to whether the policy could be made more locally distinctive.

This could be strengthened if it identified potential locations for these developments. Consideration should be given to providing adequate space for facilities and parking, so that the placement of new development does not preclude siting the community facilities in the right/best place or getting good connection to them, also with reference to the sustainable transport objectives.

9: Rights of Way

A plan showing the existing rights of way and where any future connections might be desired would be useful in the Plan so that options for connectivity are not ignored and some future infill or unexpected appeal permission develops over them. Consideration could also be given to any furniture requirements along the routes.

Section 12: Non-planning Actions

It is acknowledged, that, in line with the Planning Practice Guidance, community aspirations that do not relate to land use planning and development are presented in a separate section of the draft Plan. It may be worth considering whether the aspirations within this section can be made more specific to the local community in the event that a developer looks to them to fulfil obligations placed on a development. For example, particular areas of vole habitat? And put on a map alongside of biodiversity net gain areas?

Monitoring and Review

The plans for monitoring and review are welcomed and show that activities beyond the 'making' of the neighbourhood plan has been thought through. The parish may wish to consider what the measures or indicators of success would be for each objective and policy, so that it is clear what the monitoring and review process will be looking for.

Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA)

The draft NP was screened to decide whether it will need full assessment under the HRA and SEA regulations. The opinion at the time of screening in March 2019 was that the Plan needed full Appropriate Assessment under the HRA Regulations due to its location and potential likely effects on the Bath and Bradford on Avon Bats SAC. Normally if HRA is required, a full SEA assessment is also required. The opinion that the neighbourhood plan was likely to result in significant effects on environmental assets was confirmed by the statutory consultees, Historic England, Natural England and the Environment Agency.

Since the original screening in March 2019, the neighbourhood plan has changed somewhat in format and content and it was therefore necessary to review the screening decision for HRA. The HRA was undertaken which led to an updated 'appropriate assessment', dated 28/10/20 (copy attached) which concluded beyond reasonable scientific doubt, that there would be no adverse effects on habitats alone or in-combination with other plans and projects as a result of the Southwick NDP, subject to specified changes to policies within the Plan.

The screening decisions will need to be reviewed should the Plan change significantly following the Regulation 14 consultation.

Minor corrections

It is recommended that the wording of Policy 3 is amended as follows:

"...Proposals to sustain or extend the viable use of the Southwick Country Park and the development of new recreational facilities, signage, maintenance and ancillary uses to meet local visitor needs and to enhance biodiversity will be supported providing that;
... d) development complies with all other policies in the Development Plan."

It is recommended that the wording of Policy 4 is revised, and the following paragraph added to the end of the policy:

"...Any planning applications for development on Local Green Space must comply fully with the guidance on survey, design, mitigation and developer contributions set out in the Trowbridge Bat Mitigation Strategy. Southwick Country Park and the Baptist Church Cemetery fall within the zone of medium sensitivity in regard to habitat for species of bats which are features of the Bath and Bradford on Avon Bats SAC, as set out in the aforementioned strategy."

It is recommended that the wording in Policy 5b is amended to include the following, or similar wording (please note that only relevant sections of the policy and those needed for context are included below rather than the policy in its entirety):

"...Development of the site must:...

Be subject to survey, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy; including delivery of on-site mitigation for 100% of greenfield habitat loss and a financial contribution towards funding the local planning authority scheme set out in Appendix 1 to the TBMS..."

It is recommended that the wording in Policy 6 is amended to include the following, or similar wording (please note that only relevant sections of the policy and those needed for context are included below rather than the policy in its entirety):

"Proposals for windfall development outside of the sites identified by Policy 5a and 5b will only be supported if they are within the Southwick Village settlement boundary and where such development: ...

e) complies with the other policies within the development plan; and
f) will make a financial contribution from the developer towards mitigating residual in-combination effects from recreational pressure as set out in the Trowbridge Bat Mitigation Strategy...”

It is recommended that the wording in Policy 10 is revised, and the following paragraph added to the end of the policy, or that similar wording is used:

“...Any local infrastructure proposals should comply fully with the guidance on survey, design, mitigation and developer contributions set out in the Trowbridge Bat Mitigation Strategy. Associated planning applications will need to demonstrate there would be no adverse effect on the integrity of the Bath and Bradford on Avon Bats SAC from the application alone and in-combination with other development.”

Recommendation for Policy 6: Additional Housing Development

No changes to the policy are required aside from the policy reference correction and amendments to terminology discussed above. In order to address these points, it is recommended the policy is revised as follows (please note that only relevant sections of the policy and those needed for context are included below rather than the policy in its entirety):

“Proposals for windfall development outside of the sites identified by Policy 5a and 5b will only be supported if they are within the Southwick Village settlement boundary and where such development: ...”

I hope this provides a useful summary of our views and we look forward to discussing these comments with you as the Plan progresses to the next stages.

Yours sincerely

Sophie Davies
Senior Spatial Planning Officer

Appendix 1: Possible design requirements for Policy 5a

Advise some more specific requirements/recommendations are considered for inclusion in the site-specific policy e.g.:

- Ground floor flats to have individual front doors.
- Parking bays to be attractively detailed and partially screened behind new front boundary treatment of low, traditional stone wall and hedging.
- An element of undercroft parking to be included to create interest to elevation and be efficient with land (i.e. having floorspace above some parking spaces)
- Secure, ventilated, illuminated cycle parking and bin storage to be integrated into the structure of the building in a convenient location, not simply stuck in a separate box within the forecourt.
- Bat boxes, swift boxes, hedgehog highways etc all to be included in detailed design
- Build line to be approximately equal to the adjacent flats
- EV charge points to be provided
- Balconies or terraces for all flats
- Building materials? Building form / roof Style? Insist on a cohesive building composition and build line. Why not say a substantial part of the elevation must feature natural local stone?
- Hard surfaces to be something other than tarmac? Permeable paving to reduce runoff?
- Tree planting to be included to enhance and soften streetscene
- Chimneys or chimney-like ventilation stacks recommended, to articulate building into separate plots in reflection of terraced housing (rather than a long monolithic building) (purge ventilation stacks could be good if flats must be single aspect to protect rear neighbours privacy?)
- Can the scale go up to a mix of 2 and 2.5 storeys to be more efficient with the site?
- possibly 10+ flats could fit here and then 3 of them could be affordable (depends on how undercroft parking might be utilised)
- Incorporation of solar PV recommended along what is likely to be a long roof area.
- Corner radii turning into the site to be tight (<3m) and existing footways to be continuous across the junction.
- Integrate places to sit in the front courtyard so that residents can interact.
- Prohibit parking or public realm coming right up to GF windows – defensible space required to all GF openings.
- Space to be given over to creation of a wider public footpath outside the site (or the highways department might be expected to permit narrowing the wide carriage to fix the pavement instead? Narrowing here could be effective traffic calming for what should be a 30mph village street.

Appendix 2: Possible design requirements for Policy 5b

Advise some more specific requirements/recommendations are considered for inclusion in the site-specific policy e.g.:

- Insist accordance with Building for Healthy Life guidance
- Recommend a portion of the site be given over to self-build? Or modular build?
- Require more than one vehicle access points and a loop, to avoid creation of cul-de-sacs.
- Require additional access points for pedestrians that serve all existing and created desire lines
- Require that street network is designed that allows for an uncomplicated extension to the land to the west in future (i.e. don't have only narrow private drives serve the western edge which could stymie future plans)
- Development to address the edges of the site with frontages not rear property boundaries
- Name specific functions that would be required of the POS that might come forward with development eg children's formal play, adult exercise, allotments, woodland, drainage features and informal play.
- Are there any key views (eg of nearby landmarks or church spires) that new development should try to frame?
- In summary to these points, I don't think the site-specific policies are aspirational enough.
- Building for Healthy Life and the National Design Guide are full of ideas for good design, which are much more specific than what is in Core Policy – I recommend that these are studied and anything that is relevant is included in this site specific policy, to give it maximum weight

Relevant for both Policy 5 & 6

NP can simply adopt Building for Healthy Life as a policy requirement (See NPPF paragraph 128) and require that an independent assessment is submitted with major applications.

For further reading on up-to-date urban design/placemaking best practice see:

<https://www.creatingexcellence.net/wp-content/uploads/2020/07/Building-for-a-Healthy-Life-July-2020.pdf>

<https://www.udg.org.uk/publications/manuals/street-improvement-manual>

<https://www.gov.uk/government/publications/national-design-guide>

Appendix 1: Possible design requirements for Policy 5a

Advise some more specific requirements/recommendations are considered for inclusion in the site-specific policy e.g.:

- Ground floor flats to have individual front doors.
- Parking bays to be attractively detailed and partially screened behind new front boundary treatment of low, traditional stone wall and hedging.
- An element of undercroft parking to be included to create interest to elevation and be efficient with land (i.e. having floorspace above some parking spaces)
- Secure, ventilated, illuminated cycle parking and bin storage to be integrated into the structure of the building in a convenient location, not simply stuck in a separate box within the forecourt.
- Bat boxes, swift boxes, hedgehog highways etc all to be included in detailed design
- Build line to be approximately equal to the adjacent flats
- EV charge points to be provided
- Balconies or terraces for all flats
- Building materials? Building form / roof Style? Insist on a cohesive building composition and build line. Why not say a substantial part of the elevation must feature natural local stone?
- Hard surfaces to be something other than tarmac? Permeable paving to reduce runoff?
- Tree planting to be included to enhance and soften streetscene
- Chimneys or chimney-like ventilation stacks recommended, to articulate building into separate plots in reflection of terraced housing (rather than a long monolithic building) (purge ventilation stacks could be good if flats must be single aspect to protect rear neighbours privacy?)
- Can the scale go up to a mix of 2 and 2.5 storeys to be more efficient with the site?
- possibly 10+ flats could fit here and then 3 of them could be affordable (depends on how undercroft parking might be utilised)
- Incorporation of solar PV recommended along what is likely to be a long roof area.
- Corner radii turning into the site to be tight (<3m) and existing footways to be continuous across the junction.
- Integrate places to sit in the front courtyard so that residents can interact.
- Prohibit parking or public realm coming right up to GF windows – defensible space required to all GF openings.
- Space to be given over to creation of a wider public footpath outside the site (or the highways department might be expected to permit narrowing the wide carriage to fix the pavement instead? Narrowing here could be effective traffic calming for what should be a 30mph village street.

Appendix 2: Possible design requirements for Policy 5b

Advise some more specific requirements/recommendations are considered for inclusion in the site-specific policy e.g.:

- Insist accordance with Building for Healthy Life guidance
- Recommend a portion of the site be given over to self-build? Or modular build?
- Require more than one vehicle access points and a loop, to avoid creation of cul-de-sacs.
- Require additional access points for pedestrians that serve all existing and created desire lines
- Require that street network is designed that allows for an uncomplicated extension to the land to the west in future (i.e. don't have only narrow private drives serve the western edge which could stymie future plans)
- Development to address the edges of the site with frontages not rear property boundaries
- Name specific functions that would be required of the POS that might come forward with development eg children's formal play, adult exercise, allotments, woodland, drainage features and informal play.
- Are there any key views (eg of nearby landmarks or church spires) that new development should try to frame?
- In summary to these points, I don't think the site specific policies are aspirational enough.
- Building for Healthy Life and the National Design Guide are full of ideas for good design, which are much more specific than what is in Core Policy – I recommend that these are studied and anything that is relevant is included in this site specific policy, to give it maximum weight

Relevant for both Policy 5 & 6

NP can simply adopt Building for Healthy Life as a policy requirement (See NPPF paragraph 128) and require that an independent assessment is submitted with major applications.

For further reading on up-to-date urban design/placemaking best practice see:

<https://www.creatingexcellence.net/wp-content/uploads/2020/07/Building-for-a-Healthy-Life-July-2020.pdf>

<https://www.udg.org.uk/publications/manuals/street-improvement-manual>

<https://www.gov.uk/government/publications/national-design-guide>