

Twyford Neighbourhood Plan : Consultation Responses February 2020

No	Responder	Responder comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
1	Nigel & Celia Close	<ol style="list-style-type: none"> General comment – An excellent Plan – well done. Policy MA1. The respondents strongly support the creation of a safe cycle route from Twyford to Winchester and to Colden Common. 	<ol style="list-style-type: none"> Comment noted thank you Comment noted and welcomed
2	National Grid	<ol style="list-style-type: none"> Advice when NG's electricity & gas transmission assets cross proposed developments or are in close proximity to NG assets. No recommends as NG has no record of such assets within the Neighbourhood Plan area. 	<ol style="list-style-type: none"> Noted
3	Andy Coates	<ol style="list-style-type: none"> Flooding, TNP missing reference to Hazeley Bourne entry into the Itchen. Flow of water severely restricted by 12" pipe whereas the pipe under the main road and along Finches Lane is nearer a metre. AC knows Churchfields meadow would be used as flood meadow but at risk to Churchfields Rd and St. Mary's Terrace as same level or below the meadow. Identified in the Halcrow Water report November 2001 for the EA, who did not address issue as property owner built a garage over the pipe. Concern for the Surgery with houses built above them on a 3 metre very steep bank. Believes the bottom half of the bank to be chalk and top half soil, possibly subsidence issue. 	<ol style="list-style-type: none"> In times of flooding, water discharges into the Itchen via the meadows not through the 12" pipe which therefore does not act as a constraint to flow. There is no formal channel for this flow but rather the water spreads out into a shallow sheet in the field and discharges into the Itchen over a width of several metres. Any flooding in Churchfields Rd and St Mary's Terrace is likely to be caused by ground water rising up through local springs rather than from water discharging from the storm water sewer and backing up into these roads. The Building Regulations require that geotechnical analysis and designs are undertaken on any retaining structures, excavations, slopes, embankments and foundations and this should ensure that subsidence is not an issue.
4	Graham Feldwick on behalf of the Twyford Waterworks Trust	<ol style="list-style-type: none"> Aim to become full museum of water supply, projects for the future, e.g present aspects of water production to the public. Site important pumping station for Southern Water, and site is chalk grassland with wealth of wildlife. The Trust wish to meet and discuss with TNP. 	<ol style="list-style-type: none"> The TNP ST1 policy has been redone to clarify the wording in response to SDNPA comments. The TPC recognise the importance of the Trust and its work. ST1 gives support to development at the Waterworks as a tourism and visitor attraction.
5	Dr Coates, Company Secretary, Twyford Itchen Watermeadow	<ol style="list-style-type: none"> Policy LHE1 The Directors were very pleased that the Company's Churchfield meadow forms part of the green gap between Twyford and Shawford as the meadow's protection was the prime reason for the creation of this Company. Although not specifically mentioned the meadow, so close to the centre of the village, has excellent 	<ol style="list-style-type: none"> Table 3. Agree the Churchfields meadow should be listed as one of important Parish views across the Itchen Valley. Amended TNP.

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5	Dr Coates, TIW Ltd (cont)	views across the Itchen Valley. 2. Policies LHE4 & 5 The Directors are also committed to the environmentally sensitive management of the meadow and will always try to increase the variety of the flora and fauna within it.	2. Noted. This is helpful
6	Dr Ingrid Percival	1. Policy DB2. The development of Stacey's site not to be approved without improving pedestrian access from the site to the village amenities. West side pavement of B3335 from Brewers Lane to Brewery House is inadequate and hazardous. 2. A pedestrian crossing required. 3. Proper access and safety of the junction of Brewers Lane to B3335 for Brewers lane residents. Currently Brewers Lane currently too narrow for access for emergency vehicles including fire engines.	1. Agree need for improved pedestrian footway. 2. Crossing of B3335 & Brewer's Lane junction is an existing issue to which DB2 adds only marginally. MA3 includes aspirational policies for B3335 through the village. 3. TNP has no solution to this.
7	Ms Donna Vose	1. HN4 Percentage of affordable housing seems low compared to local need 2. HN5 increasing above 50% for site 26 would help to mitigate future rush of development outside the settlement boundary. 3. CP1 Can the number of allotments be increased?	1. Following SDLP strategic policy SD 28, the TNP identifies the need for affordable housing for local people as one of its main priorities. It makes provision in several ways – by HN5 – requiring a % of affordable housing on allocations and some infill and windfall sites, and by HN6 – exception site policy. These are to be limited to local people. The policies are likely to meet only a part of Twyford's needs. There is additional supply in the neighbouring settlement of Colden Common. The SDLP requirement for 50% affordable is particularly ambitious by the Authority and onerous for developers. It risks making it unviable for sites to be developed. 2. The TNP, following the SDLP, is the means by which development is controlled to prevent 'a rush of development outside the settlement boundary'. Increasing above 50% would make the site unviable. 3. The TPC is able to acquire land for this purpose but has not given it high priority. TPC would also need to know if land was available for this purpose and was suitable.

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7	Ms Donna Vose (cont)	<p>4. LHE5 Can the Plan review whether any of the other potential sites are suitable for biodiversity enhancement projects.</p> <p>5. MA1 Suggested cycle route would be very welcome and significant village asset.</p> <p>6. MA2 Where is the evidence that 40 extra parking spaces are required as our society is reaching 'peak car' ownership. The volume seems to contradict the sustainable development of the Plan elsewhere. 20 car parking spaces for site 26 would be a fairer number for the environment/human health.</p>	<p>4. TNP provides a framework and many sites in the Parish are being actively promoted for biodiversity by TPC, HWT and farmers through stewardship and private initiatives.</p> <p>5. Noted: support welcomed.</p> <p>6. For evidence, see MA2 and transport section of TNP website. There were various observations made in the first half of 2016 of parking demand in and around the Village Hall car-park (i.e. to include the space at the front, the doctors' small auxiliary car park and along Hazeley Road and Dolphin Hill). A detailed 12 hour survey was undertaken on a Thursday (the busiest' day on the week) in April 2016. These surveys identified a demand over capacity of around 30-40 spaces. As some parking on Hazeley Road is desirable (to slow traffic and more convenient for people visiting the shop the shop) it is proposed that only 20 additional spaces would be built initially, to get rid of the double-parking and blocking that occurs at present. However, additional land from Site 26 (Policy DB1) would be retained by the Parish Council and landscaped. This would provide flexibility for future planning.</p>
8	Steve Pullen	<p>1. Provide electric vehicle charging points in new car park</p> <p>2. Provide more allotments, current waiting list 8-10 people for at least 4 years.</p>	<p>1. Yes, the SDNP Policy SD 22 requires all new public parking to provide electric charging points 'wherever feasible'.</p> <p>2. The TPC is able to acquire land for this purpose but has not given it high priority. TPC would also need to know if land was available for this purpose and was suitable.</p>
9.	Jonathan Dunlop	<p>1. SS1 c) Planning regulations are too restrictive for photovoltaic panels to be optimally sited to get maximum solar gain as with Mr Dunlop's own property build. Flexibility in planning for maximum environmentally and financially beneficial outcomes with photovoltaic installation.</p>	<p>1. This is a buildings regulation issue which the TNP is not able to address. The TNP does not impose any new restrictions on this matter and is an issue for buildings regulations.</p>

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10	David Sullivan	<p>WE1 Flood Risk Management</p> <ol style="list-style-type: none"> 1. Twyford lucky to have upstream water storage capacity in the fields along the Hazeley Valley from Morestead to Twyford. The lakes which form in the fields to the east of the village when the bourne flows, as featured in the Halcrow Report, mean the bourne water does not flow through the village all at the same time. The flow is slowed down and peak discharge through the village is reduced. 2. Future village drainage system needs to work in harmony with these lakes. With Twyford's future development, the natural water storage system should be protected. Latest flood management research e.g. Making Space for Water programme and the work of Professor Hannah Cloke, Reading University (referenced) points to the crucial role of upstream water storage and farmers can receive income from the government for this use of land. Therefore, whatever happens in terms of Twyford's future development, the natural water storage system we are extremely fortunate to have, should be protected. 3. Silting of the main culvert at the bottom of Finches Lane near St. Mary's Terrace due to the shallow gradient. Catchment pits emptied regularly would maintain the water carrying capacity of the culvert at a very high capacity and reduce the risk of flooding to the village. Installing catchment pits along the course of the identified culvert to intercept silt before it gets into the pipe itself, and then the pits emptied regularly. 	<ol style="list-style-type: none"> 1. It is accepted that the role of the fields in slowing water flows is valuable and well known, however they quickly fill up during flooding when water flows along the valley can exceed 0.5m/sec continuously for several weeks. This is why the focus of mitigation measures in the TNP has been on improving the capacity of the storm sewer rather than any other measure. 2. Agreed and the fields are protected from development by the fact that they lie in Flood Risk Zone 3 where there is a presumption against development unless it can be shown that any development would not increase flood risk. They also sit in the countryside where development is only permitted in exceptional cases and where evidence has to be provided that such development is needed. 3. Regular maintenance of the storm sewers and ditches including silt removal is clearly important but installing silt traps in each manhole would be expensive, only partially effective and would prevent smooth flow of water through the manholes and increase potential for damage of them.
11	Trevor Wyatt for Hare Farm	<ol style="list-style-type: none"> 1. ST 1 & 2 Hare Farm provides tourism & visitor facilities and produce for visitors and residents. 2. LHE2 Trevor is concerned that development in the village is controlled and does not impact on the village character. 3. The proposed site is good as it is central to the village. 	<ol style="list-style-type: none"> 1. Noted and agreed. (ST1 amended for greater clarity) 2. Agreed and this is a central aim of the Plan. 3. Support welcomed.

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12	Ralph Scaiff	<p>HN1, 2 & 3; SB1 & HN2; CP2 Questions:</p> <ol style="list-style-type: none"> 1. How will Government plans to remove control from council's impact on the Plan? 2. Identify land outside the Settlement Boundary for building to give at least the village a say in location, not only landowners. 3. Consideration <u>must</u> be given to transport need in the future. Pedestrian, cycle, scooter, (check this word normal) electric and mobility need dedicated ways to Winchester 4. Surely the roads are community provision owned by the TPC? 	<ol style="list-style-type: none"> 1. This will not impact the Plan. Government advice is set out in National Planning Policy Guidance; the plan making process including Neighbourhood Plans, remains central to the process. It is fully up to date. The Government changes to planning controls are to the need for planning permission for certain categories of development, rather than plan making. 2. The site selection process was at all stages a consultative one; it is fully set out on the Housing page of the TNP website. 3. Agreed: see policies MA 1-5 and responses. Future transport policy/emissions/pollution is a matter for Central Government. 4. TPC takes an active interest in all highway and access issues but is neither the owner of roads nor the Highway Authority.
13	Mr Chris & Mrs Marilyn Seagrave	<ol style="list-style-type: none"> 1. DB1 Very supportive of the development adjacent to the doctors surgery 2. Hoping the car park will be built without all solid tarmac 	<ol style="list-style-type: none"> 1. Support welcomed. 2. Suggestion noted: this is a matter for detailed design but is a sensible suggestion.
14	Miss Avril Bryant	<ol style="list-style-type: none"> 1. HN3 Concerned about the other sites being considered. 2. Solar panels, etc., new housing needs to be green 3. New houses need parking for 2 cars per house, unless public transport is improved. 4. SD35 Use redundant B2 premises as land for housing. 	<ol style="list-style-type: none"> 1. Other sites were considered in the site selection process and were then discarded following public consultation, professional advice and the Council's own evaluation. The process is fully described in the Housing page of the TNP website. Only one site is now proposed in HN3 & DB1. 2. This is covered by TNP policies for Sustainable Development which follow the SDNP policies. 3. All new residential development will have to provide its own parking and some visitor parking in accordance with recognised standards 4. TNP are not aware of any redundant B2 premises in Twyford. Even if there were SDLP's policy is to retain employment premises and land in business use.

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14	Miss Avril Bryant (cont)	<p>5. BE3 Twyford Prep School development. There are too many large cars using the roads already without care for pedestrians or villages. The School should provide shuttle buses to collect pupils. Additional traffic if there are more pupils.</p> <p>6. SD34 Green businesses really need supporting with the climate emergency situation.</p> <p>7. ST1 Tourism: Litter is a huge issue which needs consideration and attention before extra residents and tourists. Encourage tourism with increased public transport and don't encourage visitors to bring cars. The village cannot support an increase in traffic.</p> <p>8. MA3 Special attention to be given to the Twyford to Shawford road as people drive at speed, in the middle of the road and the parked cars all the way, cause extra danger to drivers and pedestrians.</p> <p>9. LHE6 When will the incredibly, too bright street lighting be changed to be more environmentally friendly (especially for bats?)</p> <p>10. SD2 Ecosystems – the ever increasing traffic in Twyford and use of the High Street, B3335 as a cut through by huge lorries, needs to reduce which would reduce pollution.</p> <p>11. Parking: Shawford Downs car park should have free permits for Shawford residents and everyone else should pay.</p> <p>12. SS2: Buildings should be green and solar powered.</p>	<p>5. These problems are recognised by both the TNP and the school, BE3 is intended to ensure that additional development at the school does not make matters worse and to improve on the present situation. The school has a fleet of minibuses.</p> <p>6. Agreed: this is the purpose of several policies in TNP and SDLP.</p> <p>7. Agreed: See TNP policy ST1 and SDLP SD 23.</p> <p>8. MA3 - The issue of traffic speed / discontinuous footway / parking on the Twyford –Shawford road is recognised. The TNP aspirational policy (MA5) supports the Parish Council's efforts to get Hampshire CC to introduce further traffic calming measures (note, the 30 mph restriction was only introduced 5 years ago).</p> <p>9. TPC is the owner of the street lights in Twyford which are installed and managed on TPC's behalf by HCC contractors. So this is a matter for TPC who have not so far identified this as an issue. Generally the request is for more lighting for safety reasons, not less. Refer to TPC.</p> <p>10. This is fully agreed and has been a matter which TPC & HCC have with Colden Common, considered for many years. Alternative routes have been suggested but none are currently agreed policy and are unlikely to be for environment and cost reasons.</p> <p>11. The car park is outside Twyford's jurisdiction and belongs to HCC. Expansion of the station car park is the subject of an on-going consultation between SW Railway and the Compton & Shawford Parish Council.</p> <p>12. Agreed. See SDLP policies SD 48 - 51</p>

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15	Mrs Jane Chusson	1. MA5 c Expand this to include all of Bourne Lane. Therefore improve this stretch for pedestrians. Most pedestrians use the stretch from Bournefields to the High Street.	1. It will be difficult to achieve a footway along this section.
16	SDNP	Separate document.	Separate document
17	Mrs Susan Reynolds	1. Happy with the proposals, no specific comments	1. Support welcomed.
18	Rupert Gregory	<p>1. LHE6 page refers to 'maximum linx' level, this should be lux level as per the SDNP policy.</p> <p>2. MA5 1 g Reference to proposed measures for Norris Bridge of proposed solutions of virtual white lining and road narrowing, but HCC have already been dissuaded. Suggestion revising this to be more open so that a 'suitable solution, in accordance with HCC guidance' can be supported and implemented.</p> <p>3. Point (4e) makes reference to a limited extension of parking bays near the PO. This may well be redundant with 20-40 spaces as part of site 26 development. At the very least, wording to the affect of 'with consideration being given to local residents' should be introduced here.</p> <p>4. DB1 Expand the development brief to include the following points:</p> <ul style="list-style-type: none"> - Provision for 2 parking spaces per dwelling - Provision for electric vehicle charging for all dwellings - Provision for level footway access to continue the footway from the entrance to the Parish hall car park all the way to the entrance to the development (as a minimum) <p>5. The current proposed layout for site 26 does not meet the above criteria. There are 4 parking spaces missing and plots 1, 2, 7, 10, 11, 12 & 13 do not offer a parking space adjacent to the house meaning the provision of an electric car charging point would not be possible</p>	<p>1. Noted. Amended TNP</p> <p>2. The PC approached HCC to provide a pedestrian path across Norris Bridge by painting a white line or to provide access for vehicles as per Garnier Road. These were rejected. This remains a PC aspiration.</p> <p>3. MA5 (4e) this refers to extending the 2 hour parking restriction on existing spaces nearest the PO/ Bean Below. No new ones are proposed. Twyford Store has asked the PC if it would support extending the existing 4 hr restricted time parking bay on Hazeley Rd. The PC supports and is in negotiations with HCC.</p> <p>4. All of these points are matters for the Application applying the agreed standards.</p> <p>5. The layout shown is illustrative; it shows the principle of development on the basis of design advice. It is not prescriptive. SDNP Policy SD22 requires all new public parking to provide electric charging points 'wherever feasible', so this matter is already covered. (Map 14 changed to Map 15)</p>

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18	Rupert Gregory (cont)	6. The addition of wording to support the installation/provision of electric car charging facilities within the village. This is an essential as part of the national plan to decarbonise transportation and ban non-EV sales from 2035 onwards which would fall within the timescales of the local Plan. Every new property shall have an EV charging point.	6. The issue of charging points and scope of planning policy is under active consideration by Government. Provision of points does not now require consent. TPC will be able to instruct charging points in the new car park.
19	Nicholas Goddard	MA2 1. It is unclear to the responder how many parking spaces will be dedicated to each house in the proposed development close to the surgery? 2. There is a grave need for 'additional car parking spaces' for Twyford. However, how can the '40 additional car parking spaces' be for Twyford residents only i.e. preventing the growing number of car parking due to commuters to Shawford station?	1. The new housing will have to provide its own parking (generally 2 spaces per house) plus some spaces for their visitors. These will not be available for use by others. Parking standards are set by SDNPA for the whole of the National Park. 2. We cannot restrict the use of the Village Hall car-park to Twyford residents, as it is used by staff and patients at the Surgery, users of the village Hall and Gilbert Room. If it becomes clear that cars are being left for extended times (i.e. rail commuters or recreational walkers) then the PC will consider enforcement. It should be noted that the detailed survey only identified a small long term use by surgery staff.
20	Natural England (Non-departmental public body)	Policies DB1, LHE4 & 5, BE1, HN6 & 7 relating to Designated Sites NE's statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. 1. Policy DB1 NE recommend a landscape assessment of the proposal and liaising with SDNPA. NE comment Site S26 also has a direct drainage pathway to the River Itchen Special Area of Conservation at the southern end of the site. They welcome policies requiring a CEMP and drainage assessment to protect the River Itchen, and recommend the drainage assessment/strategy also considers impacts to the River Itchen from surface water drainage and possible solution with SuDS systems.	1. At the start of the neighbourhood plan process, TPC commissioned Landscape Consultants to prepare a bespoke landscape character assessment and further reports to review the Settlement Boundary and appraise possible development sites. These formed the basis of decisions of TNP approach to the allocation of development sites. The reports of Terra Firma and a detailed description of the site allocation process is in the evidence of the TNP shown on the Housing Page of the TNP website.

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20	Natural England (Non-departmental public body)	<p>2. Policy LHE4. NE welcomes Policy B9 for development to enhance green infrastructure. (1 a) NE advises reference is made to the recent Hampshire Ecological Network Mapping, produced by Hampshire Biodiversity Information Centre on behalf of Hampshire Local Nature Partnership which can act as a useful tool for detailed targeting of appropriate areas for green infrastructure and nature conservation.</p> <p>3. Policy LHE5 NE welcomes the inclusion of policy LHE5. In the Defra 25 Year Environment Plan and recent updating of the National Planning Policy Framework, the Government has committed to making sure the existing requirements for net gain for biodiversity in NPP are strengthened and the current trend of biodiversity loss is halted. Net biodiversity gain ensures that all residual losses from a development are accounted for and addressed. NE suggest rewording this policy to ask all developments to achieve a net gain for biodiversity and wildlife habitats, including buffering and creating links to existing sites.</p> <p>4. Policies BE1, HN6 & 7 relating to Designated Sites. NE note the Plan refers to SSSIs, SINCs and ancient woodland in LHE5. NE recommends that reference is also made to the River Itchen's status as an internationally designated Special Area of Conservation (SAC).</p>	<p>Ecological Assessments have also been carried out on this land. Prior to Pre-Submission. The whole plan was subject to Strategic Assessment and Habitats Regulation Assessment (because of proximity to Itchen SAC). The potential for harm from run-off was recognised and additional wording proposed by Natural England, Southern Water and the Environment Agency. This is now incorporated in DB1. The SDNPA has been working closely with TPC at every stage of the process.</p> <p>2. Green Infrastructure. The support of NE is most welcome. We have followed up the reference to Hampshire Ecological Network Mapping and HBIC has supplied the relevant map which provides direct support for TNP's designation of the Itchen Valley, etc. It is hoped TNP's designation will form part of wider linked designations by Winchester City Council, SDNPA and Eastleigh to the south. Amendments have been made to this policy to respond to concerns of the SDNPA. These also address the wider green infrastructure function of other parts of the TNP.</p> <p>3. Suggested rewording noted. Amended TNP para 1 of supporting text to include SAC Itchen. Note that policy SD 9 of SDLP incorporates the "net gain" policy; TNP relied on it. Policy has been amended in line with SDNPA comments and to incorporate NE proposals.</p> <p>4. Noted: Text reviewed to ensure River Itchen is fully referenced and protected.</p>

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20	Natural England (Non-departmental public body) (cont)	<p>5. NE also advises that internationally, nationally and locally designated sites, and irreplaceable habitats (including ancient woodland) are considered with Policies BE1, HN6 & 7 with requirements for development to ensure any adverse impacts are appropriately assessed and addressed through avoidance, mitigation, or, as a last resort, compensation.</p> <p>6. Detrimental effects on Solent European sites from increased nutrients effecting water quality in the Solent catchment, are also subject to strategic approaches to avoid deterioration of the water environment. Addressing waste water implications from new housing in the Plan area includes requirements for new housing to demonstrate nutrient neutrality.</p> <p>7. <u>Priority habitats and protected species</u> NE note that Priority Habitat (habitats listed as required by S41 of the NERC Act 2006) is present both within and around the boundary of the NP. These areas should be considered when locating new development, and opportunities taken to enhance the ecological value of these areas, including net gain, to contribute to preserving and protecting their integrity. NE also advise considering whether any proposals might affect priority species (link given) or protected species.</p> <p>8. NE attach an annex to their letter which covers issues and opportunities that should be considered when preparing a NP. To assist this NE has produced advice (link given) to help understand the impact of particular developments on protected species.</p>	<p>5. Noted: The policies of the TNP and SDLP are to be read and applied as a whole. These policies have been reviewed to ensure that this is clear.</p> <p>6. Noted and agreed: TPC are aware of this and of the steps being taken to mitigate the effects of nitrogen enrichment, etc. Text added to PO1.</p> <p>7. Noted: TPC assessed about 30 sites for the allocation of the very modest development for 20 houses. The criteria for assessment were those also used by SDNPA, including those of ecological sensitivity. The site selected was close to the centre of the village and not close to any designated site. The subsequent SA and HRA fully undertook further consultation with NE and did not indicate any species or habitats at risk (other than the SAC).</p> <p>Opportunities for enhancement are noted and encouraged by other policies of TNP e.g. LHE4.</p>
21	Peter & Maggie Lippiett	<p>1. 3 ST, 2nd para; should St. Mary's Church and churchyard also be instanced here?</p> <p>2. There are a couple of references e.g. p 35, to Twyford Preparatory School 'benefitting the village' – apart from some local employment, does the school benefit the village in any way?</p>	<p>1. Agree and text added to Table 3.</p> <p>2. The schools have supported the TNP statements and given additional evidence of benefits to the village. TNP accepts Twyford School as an integral part of the village, albeit one which has grown to service a much wider area and causes traffic problems which are acknowledged. Note the changes to the text of BE3.</p>

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21	Peter & Maggie Lippiett (cont)	<p>3. MA5 – Might consideration be given to access to Northfields Play area from Cox’s Hill (perhaps in conjunction with a ‘tactile drop-kerb crossing point)?</p> <p>4. MA1 & IDC1 & 2 – maintaining the full width of the pavement on the east side of the B3335 Cox’s Hill would readily and cheaply allow for dual use pedestrians and cyclists.</p> <p>5. MA3 minor traffic management - Suggest double central white lines from Hockley Cottages up Cox’s Hill into the village. Facilitating overtaking here makes residents’ access to this road even more dangerous.</p> <p>6. PO1 – p.60. How to mitigate (increasing) N₂O pollution on B3335 when there is no ability to slow or reduce traffic?</p> <p>7. Responders fully support and urge a ‘green lens’ for all development in Twyford to reduce our contributions to carbon footprint and global warming.</p>	<p>3. Yes, this has been considered but would not be acceptable to the Highway Authority. There is an informed well used footpath from Cox’s Hill to the play area, which provides a much shorter but very steep route. There is clearly scope for this to be improved.</p> <p>4. There is insufficient space to accommodate a wider footway along the east side of Cox’s Hill and the adjoining high bank makes any widening unlikely.</p> <p>5. A matter for HCC and their Road Safety team. There are already double white lines from north of Hockley Cottages to the top of the bus lay-by at the top of Cox’s Hill, those to the north are solid on both sides whilst those on Cox’s Hill have the ‘offside permissive’ lines (i.e. broken on one side). The introduction of these warning lines relates to the speed of traffic using the road and any future changes in speed limit should precipitate a review by HCC.</p> <p>6. TPC and WCC have both been monitoring pollution levels from the B3335 (High Street and Searles Hill). While significant, it does not exceed current triggers for control measures and remains a continuing action of both Councils.</p> <p>7. The framework for “the green lens” is provided by the joint aims of NPPG, SDLP and TNP and by the more detailed policies of SDLP and TNP e.g. SS and reducing the need to travel.</p>
22	Lucy Hutchin	<p>1. Policy HN1 & 3. Size restrictions for new houses don’t seem very generous – a 3 bed house can only be 1291 sq feet and a 4 bed house 1500. That’s quite a small square footage houses with those number of bedrooms.</p>	<p>1. HN1 & HN3. The house sizes for new dwellings are set by TNP because one of the principle aims of the TNP, based on the analysis of housing need, is for affordable houses for local people. The larger the house the less affordable it becomes. So a balance has to be struck between achieving the largest floor space and affordability. SDLP has the same aspiration as TNP and expresses it by limiting the number of bedrooms. The experience in Twyford is that 4 bed houses or even 3 bed can be so large as to be unaffordable for most local people. The guide to the space required for different numbers of bed spaces is set</p>

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22	Lucy Hutchin (cont)	<p>2. Question HN7? Responder queries whether the Plan is saying it is ok to build outside the Settlement Boundary if it's 100% affordable housing scheme? Responder does not agree with the logic of this. Question on HN7. Suggestion either to decide the size of the village can be increased or decide if the countryside is important and it shouldn't matter what is intended to build on it.</p> <p>3. Policy BE2. The responder is intrigued about the options for the mill/nursing home section and what could be built there.</p> <p>4. Policy BE3. The responder is aware the School had some draft plans for traffic management a few years ago but felt they were not particularly sensible and nothing has been heard since. The responder wishes the Twyford Prep School section needs to state more strongly that even if the School does not expand they need to sort out their traffic management.</p>	<p>out in Nationally Prescribed Space Standards but the TNP figures are approx 20 % over these guidelines and so will provide ample room.</p> <p>2. The policy making provision for affordable housing outside the settlement boundary provided all the housing is affordable, is a strategic policy of the SDLP which TNP has to follow. Twyford's need for additional affordable housing fully justifies this policy. HN7 question: No settlement can stand still; land use changes constantly. The TNP is the means of setting the balance between competing uses by putting in place policies and boundaries. The duration of this plan is intended to be 13 years or so, or until the plan is revised.</p> <p>3. The TNP policy BE2 and 2.1 sets out the current position, which explains that the landowner has consent for the care home but may choose not to build it and apply for alternative development.</p> <p>4. As BE3 explains, Twyford School is a substantial and very active institution. It recognises the impact of school traffic on local roads and the need to work to reduce this. The master plan has been an intention of the School as well as TNP and will be the means by which this is achieved.</p>
23	Mrs Rosemary Harding	<p>1. Policy BE3. The responder states most schools have school buses and gives example of Princes Mead had to do this as part of planning consents. Recommendation for Twyford School to have school buses for the children in order to cut down on traffic movement generally.</p> <p>2. Policy CP3. Question – has any thought to a new primary school being built suitable to the 21st century and the old school being converted to housing?</p>	<p>1. BE3: Agreed, Princes Mead was obliged to introduce school buses as part of a planning approval. A similar condition could be applied to any new planning approvals on the Prep School site. As BE3 explains, Twyford School is a substantial and very active institution. It recognises the impact of school traffic on local roads and the need to work to reduce this. The master plan has been an intention of the School as well as TNP and will be the means by which this is achieved.</p> <p>2. The governors have not indicated that this is their intention or asked for TNP to identify a site.</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
23	Mrs Rosemary Harding (cont)	<p>3. Page 40, Landscape, Heritage and Ecology Why is there no proper gateway suitable for wheelchairs and push chairs at the Hockley Mill entrance to the meadows? The responder writes that currently a metal gate frame about 18” off the ground has to be climbed over which is impossible with chairs.</p> <p>4. A suggestion of a need for a link ‘permissive’ path from the path by ‘Knighton’ across the field to link to Cockscomb by the farm.</p> <p>5. A suggestion the lay-by opposite the Hockley Golf Club has a time restriction as it is used by commuters for free parking all day and therefore cannot be used by the public during the week.</p>	<p>3. This is not a neighbourhood plan matter but for Rights of Way Authority (HCC) and the landowners (Hampshire Wildlife Trust)</p> <p>4. New footpath link from Knighton. This possibility is landowner dependent. Love Lane provides a reasonable alternative.</p> <p>5. Hockley lay-by. Agreed this would be a beneficial introduction, however this is wholly under the control of HCC.</p>
24	Ms Jemma Barter for Winchester Friends of the Earth (WFotE)	<p>1. Policy LHE5. A request that the TPC designates an area/areas for tree planting. Friends of the Earth analysis shows that Winchester district needs to almost double its current tree cover (from 15% to 29%) and the parish should play its part in helping to achieve this.</p> <p>2. Policies HN1 – 6. Strong support for the TPC preferred site for new housing as this is close to village amenities and public transport links and so reduces dependency on cars.</p> <p>3. However the council should aim that all new housing is zero carbon and nature-friendly and should include this in their housing policies.</p> <p>4. WFotE state the council must drive the adoption of renewable energy rather than leave it to individual choice, particularly as the installation of gas boilers in new homes is due to end in 2025. Housing policies should state that all new homes, replacement dwellings and major refurbishment projects should be fitted with renewable energy.</p>	<p>1. LHE5: Tree Planting: The desirability of tree planting generally as a means of combating climate change is acknowledged by TPC. TPC is currently considering what initiatives to take, e.g. planting more trees on its own land, protecting more existing trees or working with landowners. Tree planting has significant effects on its own and may compromise either objectives e.g. keeping the existing character and ecology of downland (an open landscape), or of the valley plain (marsh, meadow with specialised ecology). The use of tree planting to restore ancient landscape e.g. hedges and verges would fulfil multiple objectives. This is also a wider issue which SDNPA among other bodies are discussing, in part to mitigate the damage and loss of ash trees to Ashdieback. Note significant recent planting by several farmers and landowners.</p> <p>2. Support noted and welcomed</p> <p>3. Note that these objectives are those set out in TNP’s Section 2 “Vision and Objectives” especially 2.2.</p> <p>4. TPC takes its lead on this from SDNPA; its Local Plan policy SD 48 requires all new development to achieve minimum standards of energy efficiencies, and other sustainable design features. The TNP policies are SS1 & 2 which have been redrafted.</p> <p>The TNP accepts that the issues of carbon emissions and</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
24	Ms Jemma Barter for Winchester Friends of the Earth (WFotE) (cont)		climate change are of the first importance. It shares this stance with SDNPA and WCC. TNP does not differ from SDNPA and is therefore able to reply on the policies already put forward by SDNPA in their Local Plan as the result of research. The SDLP policy for climate change and sustainable use of resources is SD 48.
25	Mrs Wendy Sullivan	<p>Policy DB1 and map 14.</p> <p>1. The responder believes not to heed the salutary lessons from other severe flooding areas during winter 2020 would be a failure. The area shown for the proposed houses numbered 17, 18, 19, 20 (map 14) is part of the flood plain, used for water storage in times of high groundwater levels or as a route of the Winter Bourne, as in previous flood years. Experts are saying flood plains should not be built on. Future building must not be allowed on such an important area.</p>	<p>1. Houses would not be allowed to be built on the flood risk area (Flood Zone 3) which is an approximately 10 metre strip of land adjacent to Hazeley Road.</p> <p>Building on the remainder of Site 26 is unlikely to increase flood risk to any significant degree. Run off design for development, has to cater for intense rainfall over short periods for which there are standard design requirements set by the Environment Agency and which allow for climate change. Flooding of Hazeley road and the car park occurs from winterbourne springs which rise only after long periods of rainfall, and is independent of the short periods of intense rainfall for which there are standard design requirements set by the Environment Agency and which allow for climate change. Flooding of development is required to design. Flooding as a result of the winterbourne springs rising occurs at rare intervals, perhaps once in every 12 to 20 years, and continues for up to a month often in periods of low rainfall. The likelihood of the short period of intense rainfall, for which development has to design, coinciding with the same four week period of a 12 year flood event is beyond the normal calculation of flood risk and involves small volumes compared to winterbourne flood flows. As the Hazeley road drains, downstream of Site 26, are sized for the winterbourne flood event, they should provide more than adequate capacity for the short periods of intense rainfall which may run off this small housing site in a flash flood. In</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
25	Mrs Wendy Sullivan (cont)	<ol style="list-style-type: none"> 2. If at some time in the future the field becomes available, could the lower part be used for car parking? Built with a permeable surface so that in times of high groundwater flooding, disruption would be minimal and limited to car parking spaces. No householders would be affected. The four houses that would be lost could be made up for by infilling. Permission has already been granted for 2x2 bedroom houses to be built in the garden of Brookfield, Hazeley Road, plus 2 new houses being built in Dolphin Hill. 3. The policies that TPC have put in place (DB1) for development for Site 26 will help to a degree to mitigate the worst of flooding, but the responder believes in the end nature will always win. For flooding mitigation, there may be a need for a formal Bourne Catchment Management Plan along the whole length of the Hazeley Valley to the Itchen to protect the village. 4. The responder commends the TPC work on flood prevention/flood mitigation, and had noted the work at the time of storm Dennis cleaning drains along Hazeley Road as part of the Parish Council's ongoing programme of maintenance of the culvert and part of the flood prevention programme. The responder is very encouraged by all the work the TPC is doing to prevent occurrences again. 	<p>addition, as a normal part of the planning application, a flood risk assessment will be required and, if considered necessary, the developer will be required to construct independent storage/attenuation measures to ensure that storm water discharge volumes from the development into the existing drainage system do not exceed the greenfield run-off. In this respect, South Downs Policy SD50 on sustainable drainage is applicable.</p> <ol style="list-style-type: none"> 2. It is planned that some of the lower part of the site will be used for additional parking and it may well be appropriate for this to be built with a permeable surface. No houses will be allowed to be built within the Zone 3 flood risk strip adjacent to Hazeley road. 3. It is anticipated that the flood mitigation measures proposed in the TNP will go a long way to preventing future flooding and that this in conjunction with the flood management plan already put in place by Twyford Parish Council is appropriate for managing future flood risk. 4. Support noted and welcomed
26	John Dickson	<ol style="list-style-type: none"> 1. Policy WE2 para 3. A comment on this reference needing to be factually correct from a St. Mary's Terrace resident referring to the sentence 'A similar problem of water penetrating and causing backing up of sewage into adjoining houses occurs in Finches Lane and St. Mary's Terrace after particularly heavy storms'. 	<ol style="list-style-type: none"> 1. Comment noted and wording in TNP changed.

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
26	John Dickson (cont)	<p>The responder believes it is important to give factual information in order to encourage Southern Water, the authorities, etc to take note of our sewer system issues, and although clear water appeared over the top of only two drain covers in St. Mary's Terrace only in 2013/14 (not raw sewage) into a garden and onto pedestrian walkway on Finches Lane. This only happens very rarely at peak flooding events. The responder believes sewage has not yet been caused to back up into properties in St. Mary's Terrace. The sewer system was rendered unusable due to 'hydraulic overload' and a report was made by Giffords to show that St. Mary's Terrace sewer run cannot discharge to the main larger sewer (in the Avenue) during such events and therefore would benefit by being upgraded/moved along the shared path to the rear in order to join the Finches Lane section instead.</p> <p>A change of wording is proposed which would help encourage support from Southern Water but without risking tarnishing these houses unnecessarily, such as: 'A similar problem of water penetrating and causing backing up of sewage into adjoining houses occurs in Finches Lane' ... 'while in St. Mary's Terrace two houses have reported groundwater draining out of garden sewer drain covers in extremely rare conditions (i/e 2000 and 2013) when significant local flooding occurred and when the larger village sewer system as a whole has been reported as suffering from "hydraulic overload".'</p>	
27	Mr Jim Bailey, Pegasus Group representing Vortal Properties Ltd.	<ol style="list-style-type: none"> Policy DB1. Support for the allocation of Site 26 for the provision of 20 dwellings. See detail in the accompanying letter on housing needs and sizing. Policy HN1. Part 3. Concerns regarding the wording of this policy, as there is no explanation or justification provided in relation to the setting of, apparently arbitrary, maximum dwellings sizes. See detail in the accompanying letter on housing needs and sizing. 	<ol style="list-style-type: none"> Support welcomed. The evidence base for the limit on house sizes has now been reviewed in a technical paper. The approach of the New Forest Local Plan and its Examiner. Have been noted. Following comments of SDNPA and others the proposed house sizes are now referenced back to nationally prescribed minimum but increased by 20% to reflect the diversity of Twyford's needs. As a result, the size of the 4 bed house is increased in HN1 to 150 m sq.

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27	Mr Jim Bailey for Pegasus Group representing Vortal (cont)		Text has also been added to HN3 (Affordable Housing) in response to queries on the effect of this policy on viability. It proposes that HN1 should be the first policy to be reviewed if, for instance DB1 is shown not to be viable before adopting the measures proposed by SDLP in para 7.65.
28	Michael Biddle	<p>Policies SB1 & 2</p> <ol style="list-style-type: none"> 1. The extent of the Settlement Area. A list of areas of Twyford which are not within the Settlement Boundary are listed as a surprise to residents – the Colleton House complex, Manor Farm Green, the Manor House and the Monastery, Segars Farm, and on Finches Lane to the west of Queen Street, Old Rectory Lane and adjoining St. Mary’s Church, and on Hazeley Road and the southern end of Bourne Lane, and Love Lane. The responder believes all these properties are an integral part of the Village, and should be within the Settlement. 2. Policies MA5 & 6. There appears a significant inconsistency between part of Policy MA5 and Policy MA6 with regard to Hazeley Road, Queen Street and, in particular, Bourne Lane between Hazeley Road and Bourne Fields. Policy MA5 would encourage the Highway Authority to create enhanced pedestrian access or facilities. Policy MA6 invokes SD 21, in which para 6.29 regarding Historic Rural Roads says ‘The integrity of banks, hedges, walls and roadside trees must be maintained’. Short of making these roads pedestrian only – which is not a realistic option – there is no space in which to add exclusively pedestrian access. It is therefore unrealistic to encourage the Highway Authority to take action. Bringing these two matters together, I would further suggest that it would make sense to bring both Hazeley Road (and the houses within the 30 mph limit) and Bourne Lane (and its houses) within the Settlement Boundary to give the Parish Council slightly more influence with the South Downs National Park Authority. 	<ol style="list-style-type: none"> 1. SB1: The settlement boundary was reviewed for TNP by independent consultants, using criteria which SDNPA as planning authority had used. TNP accept that the areas listed are an integral part of the village. However, that is not the purpose of the settlement boundary which is to define precisely to which properties particular policies apply. 2. There will always be an inconsistency between providing, say a new kerbed and tarmac footway and preserving the rural character of a road. Each case needs to be carefully considered by firstly the Parish Council, then HCC as highway authority as to what can safely be provided and then local residents. Finally funding will always be an issue.

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29	Rowland Robinson	<p>1. Policy MA2. Parking: The notion that restrictive parking will be adhered to for the planning proposal in Hazeley Road is unsustainable unless measures are taken to ensure monitoring and enforcement are written into the planning consent.</p> <p>Existing yellow lines in the village are blatantly ignored by one and all. Cars are regularly parked illegally throughout the village and nothing is done to 'police' this state of affairs. Numerous requests to the traffic enforcement department at WCC have fallen on deaf ears. What makes the new parking proposals any more likely to be successful than the existing restrictions have been?</p> <p>As a resident of St. Mary's Terrace, off Finches Lane I regularly attempt to enter or exit my property safely but have to do battle with cars parked over the yellow lines illegally. Additionally these illegally parked vehicles cause problems for delivery vehicles unable to enter or exit the Terrace safely. We can see this situation being replicated in Hazeley Road putting, pedestrians and cyclists at more risk.</p>	<p>1. We are not aware of "blatant ignoring of parking restrictions". WCC are instrumental in imposing restrictions and are aware of the need for effective enforcement. The policy within the TNP to create 20 new car parking spaces as part of the development of Site 26 should go a long way to relieving pressure on parking and thus the incidence of any illegal parking along Hazeley Road.</p>
30	Tom & Melissa Frost	<p>BE2 & MA4 with reference Introduction, paras 1.3 & 2. 2.4, MA1 & 5, PO, LHE2.</p> <p>1. <u>Traffic, Cycling Routes & Pollution.</u> Traffic is identified in the draft TNP as one of the most important long-standing issues and one of the points of Vision and Objectives is: 'To manage and reduce traffic impact on the Parish, improving road safety, minimising car usage and meeting parking needs, especially through new development and by improvements to walking and cycling routes'.</p> <p>2. <u>Possible New Road.</u> Reference last paragraph of BE 2 supporting text, page 27. This is a major piece of new infrastructure however policies MA4 include no details or criteria relating to the possible new road such as:</p> <ul style="list-style-type: none"> • Traffic impact (increase) on B3335 in the north of the village, including pollution impact (see item below) • Improving road safety (including the junction between the possible new road and the B3335) 	<p>1. Agreed and this is the purpose of many of the MA Movement and Accessibility policies, but it is important to note that any such policies are beyond the authority of the TNP and hence are shown as "aspirational".</p> <p>2. Map 6 shows an indicative line for a new link road from the B3335 into Hazeley Enterprise Park (HEP). This road would have to be privately funded by HEP and is promoted within the TNP as means of reducing traffic, particularly HGV movements through the village centre. At present all HGVs from HEP are supposed to use the eastern section of Hazeley Road to avoid the village centre and then have to use the Morestead Road, but many do not adhere to this route.</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
30	Tom & Melissa Frost (cont)	<ul style="list-style-type: none"> Hours of work and HGV traffic (the proposed route passes close to residential homes in Northfields, Hockley and along the B3335) Confirmation that the possible road will benefit the community as a whole (as opposed to leaving the current access for HGV traffic via the existing route) i.e. a summary of pros and cons. Landscaping (map 6 only identifies landscaping requirements around the Enterprise Park itself and not the possible new road) Requirement for pedestrian and cycle routes related to the possible road <p>The respondents wish to see more information on the assessment of this possible new road given the importance of the traffic issue in the village.</p> <p>3. <u>Cycling routes</u> We are pleased to see improvements to cycling routes included in the vision and objectives and consider this an important element to enabling reduction of traffic and associated pollution. Provision of pedestrian and cycle routes is mentioned in a number of locations in the draft TNP. We fully support the policy item under MA1: "The Highway Authority will be urged to complete a cycle route through the village from Hockley traffic lights through to Colden Common".</p> <p>4. We would like to see a more structured approach to cycling routes to/from and within Twyford through the following:</p> <ul style="list-style-type: none"> A master plan for cycling and pedestrian routes, including lighting of routes to encourage greater use after dark Widening of the pavement along the East of the B3335 to the north of the village to allow a mixed-use cycle / pedestrian route from the village to the existing pedestrian / cycle route into Winchester along the old railway line, especially along the section of route that is at national speed limit Safe crossing routes for cyclists across the B3335, including at 	<p>Any such road would need to have a junction with the B3335 designed to current safety and highway standards and need to cater for all types of vehicles, large and small. Planning of such a road would, in due course, need to address all the points raised by you before being approved but this level of detail analysis is beyond the scope of the TNP.</p> <p>If implemented, this proposal would add a small increment of traffic to the B3335 north of the village.</p> <p>3. The Parish Council has received funds to investigate the introduction of a cycle route from the village to Hockley and a small working party has been set up. Your detailed points are noted but are beyond the scope of this working party except that it will address any issues about crossing points and the safety of the arrangements at Hockley. Any progress will be reported back to the Parish Council.</p> <p>4. Any broader master planning, as suggested by you, especially that requiring changes to the road network would need to be undertaken by or under the auspices of the highway authorities.</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
30	Tom and Melissa Frost (cont)	<p>the junction between the B3335 and M3 and to/from any new mixed-use cycle / pedestrian route along the B3335. Widening of the pedestrian route or addition of a dedicated cycling route to connect Old Rectory Lane to Churchfields Road</p> <ul style="list-style-type: none"> to allow better cycling access between North Twyford and Shawford Station Other opportunities to improve cycling access to/from and around the village without having to rely on cycling along the B3335 given the heavy traffic on this road. <p>5. <u>Pollution</u>. Policy PO1 – Pollution and Contaminated Land. Traffic through North of village along the B3335 is already resulting in occasionally exceeding recommended levels of Nitrous Oxide from vehicle emissions. Policy - PO1 states: “Development proposals will be subject to SD 54 and SD 55. TPC will seek to reduce existing levels of pollution and mitigate further rises.”It is not clear how this will be achieved. We have the following concerns which are not mentioned in the draft TNP:</p> <ul style="list-style-type: none"> HGV traffic from Hazley Enterprise Park currently is routed away from the village and the B3335. The possible new road from Hazley Enterprise Park (MA4) would route this traffic through the north of the village along the B3335 which will increase the instances of exceeding the recommended levels of Nitrous Oxide along this route. The proposed additional housing at Fair Oak in the Borough of Eastleigh (6,000 homes) will inevitably substantially increase the traffic through the village and further increase the instances of exceeding the recommended levels of Nitrous Oxide along this B3335. <p>Has the Parish Council considered any means to reduce and/or mitigate levels of pollution, such as restricting traffic in either or volume or speed?</p>	<p>5. TPC has been raising awareness of pollution levels along the B3335. Pollution is clearly identified as a factor to be taken into account under PO policy.WCC has an emissions testing tube at the top of Queen Street on a pole. It provides a monthly average which has measured within the satisfactory section – just. The PC wished to undertake more measuring points along B3335 in the village but to meet WCC regulation standards it would be both too difficult and expensive for the PC to fund and provide no better data.</p> <p>Where nitrous oxide levels are exceeded, Authorities are required to specify appropriate measures to reduce the issue. At present the levels are not exceeded.</p> <ul style="list-style-type: none"> The proposal for a new link road directs traffic from Hazeley Road to B3335 and so shortens the route from HEP to the motorway avoiding most of the National Park. This clearly reduces total emissions. It is expected that this road would require environmental appraisal including emissions before any approval is given. This proposal is to be removed from the Eastleigh Local Plan. The Parish Council was an active objector (and contributor to Eastleigh’s housing proposals at Fair Oak). The Inspector’s preliminary report shows that this development is now unlikely to occur. Reduction of traffic volumes on B3335 is outside TPC’s control. Measures to control speed, etc., are matters for HCC. These matters have been the constant concern of TPC for the last 60 years (at least) and will remain so. Any suggestions on how any of this can be achieved are always welcome. TPC has regular meetings with HCC who share the Parish’s concerns and are open to proposals which balance the function of the B3335 as a major traffic route for vehicles and cyclists with the village’s environmental concerns.

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30	Tom and Melissa Frost (cont)	6. BE2 & LHE2 Visual Impact Proposals to reduce the impact of the proposed care home at Hazeley Enterprise Park on the landscape and on the village are encouraged in the draft TNP. We support this and would suggest a stronger requirement on managing visual impact given the prominent location of the Enterprise Park on high ground.	6. The support is noted and welcomed. The policy as drafted provides the appropriate basis for achieving the agreed aim. Note other changes to this policy.
31	Ms Charlotte Mayall for Southern Water	<p>Policies CP2 with Table 2, WE1, WE2, IDC1, & DB1.</p> <p>1. Policy CP2. Southern Water owns and operates Twyford Water Supply Works (including 'Twyford Waterworks'), extracting over 20 megalitres per day for public supply to meet the needs not only of Twyford residents but of those living in the wider geographical area.</p> <p>As such, this does not qualify the operational function of Twyford Water Supply Works as a community facility. Southern Water understands that 'Twyford Waterworks' (as leased to the Twyford Waterworks Trust that runs public open days in part of this historic building) is the community facility that the Parish Council wish to designate. Southern Water's operational part of the site is not accessible to the public.</p> <p>Policy CP2. Therefore, to avoid any potential misinterpretation of the inclusion of this site as a community facility, which would then be subject to Policy CP2 of the neighbourhood plan and Policy SD43 of the South Downs Local Plan, we would ask that the differentiation is made clear by making the following amendment to Table 2 (new text underlined); Twyford Waterworks <u>(as run by Twyford Waterworks Trust)</u></p> <p>2. Policy WE1. Southern Water is the statutory wastewater undertaker for the Parish of Twyford, and at a regional scale, is one of a number of Risk Assessment Management Authorities (RMA's) responsible for the delivery of DEFRA's flood and coastal erosion risk management policies in England. The Environment</p>	<p>1. Agreed. Amended TNP</p> <p>2. Comments noted. The involvement of Southern Water in working with developers to ensure flood risk is not worsened is welcomed</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
31	Charlotte Mayall for Southern Water (cont)	<p>Agency is the main statutory body responsible for managing the erosion risk management policies in England. The Environment Agency is the main statutory body responsible for managing the risk of coastal, fluvial or ground water flooding, and provides advice on planning and development issues in high flood risk areas. Southern Water is responsible for managing the risk of flooding from its sewer network, and will assess the impact of any new development proposals on its existing network. Where necessary we will seek to ensure that occupation of development is phased to align with the delivery of network reinforcement. Developers will contribute to infrastructure delivery via the new connection charge (introduced by Ofwat in April 2018) – more details and a downloadable document can be found on our website; https://www.southernwater.co.uk/developing-building/connection-charging-arrangements, Twyford's sewer network is a foul only system, and as such is not designed to convey surface water or storm water. Large volumes of surface water entering the system (as a result for example of misconnections of surface water to the foul system) during high rainfall events, can overwhelm the network resulting in flooding. It is therefore important that any new development strictly adheres to the drainage hierarchy set out in Building Regulations H3 and is prevented as far as possible from connecting to the foul system.</p> <p>Southern Water will work with developers and the relevant authorities to ensure drainage strategies that will ensure new development does not make the existing flood risk situation worse.</p> <p>3. Policy WE2. With reference to point (1) of the supporting text to Policy WE2, Southern Water already maintains records of sewer flooding incidents that are reported to us via our Customer</p>	<p>3. Comments noted. Policies WE2.2 and WE2.3 have been deleted</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
31	Charlotte Mayall for Southern Water (cont)	<p>Services channels (online or by telephone). This data helps inform decisions taken by the business regarding investigations and any subsequent remedial work. It is important for customers to report any sewer flooding to Southern Water via this route. Regarding points 2 and 3 of Policy WE2, these could be more appropriately drafted as Aims rather than policy, since Planning Guidance (ref Paragraph: 041 Reference ID: 41-041-20140306) states that neighbourhood plan policies '<i>should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.</i>' Regarding point 4 of Policy WE2, an effective means of minimising the impact of new development on existing flood risk would be to include a requirement that seeks to reinforce the drainage hierarchy established in Building Regulations H3 for applications for new development, or extensions to existing development, by ensuring that surface water is separated from to the foul network.</p> <p>4. Having regard to the above, we recommend the following amendments to policy WE2 (new text underlined): <i>Applications will need to provide a drainage plan to show that the drainage associated with the site will either utilise an existing main drainage system foul sewer for foul drainage only, at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar). <u>Details of the proposed means of surface water run-off disposal to be in accordance with Part H3 of Building Regulations hierarchy as well as acceptable discharge points, rates and volumes to be agreed by the Lead Local Flood Authority, in consultation with Southern Water.</u></i></p> <p>5. Policy IDC1 Southern Water is the statutory water and wastewater undertaker for Twyford and as such has a statutory duty to serve new development within the parish. Over the life of the Neighbourhood Plan, it may be that we will need to provide new or</p>	<p>4. Agreed and suggested text becomes Policy WE2</p> <p>5. Agreed and proposed additional text becomes Policy IDC1.3</p>

No	Responder	Comments with identified areas of policy, references, etc. from the TNP and recommended amendments	TPC Response
31	Charlotte Mayall for Southern Water (cont)	<p>improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.</p> <p>6. We could find no policy support for the general provision of new or improved utilities infrastructure. The NPPF (2019) paragraph 28 establishes that communities should set out detailed policies for specific areas including <i>'the provision of infrastructure and community facilities at a local level'</i>. Although the Parish Council is not the planning authority in relation to water or wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy criterion as follows: <u><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan</i></u></p> <p>7. Policy DB1. As set out in our comments on Policies WE1 and WE2, Twyford's sewer network is a foul only system, and as such is not designed to convey surface water. Applications for new development, or extensions to existing development should ensure that surface water is not connected to the foul network and planning policies can support this, by seeking to reinforce the drainage hierarchy established in Building Regulations Part H3. Southern Water has limited responsibility for surface water and we therefore advise the Parish Council to work with the Lead Local Flood Authority (LLFA) to ensure that appropriate planning policies are in place to cover surface water drainage. We therefore recommend the following amendments to policy DB1 (new text underlined):...</p>	<p>6. Policy IDC1.2 has been changed to read "Provision of new and improved utilities and other infrastructure set out in 1 -7 above will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan".</p> <p>7. Suggested text accepted and becomes revised policy DB1 (I).</p>

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31	Charlotte Mayall for Southern Water (cont)	<i>A drainage plan must be provided to show that the drainage associated with the site will either utilise an existing main drainage system or foul sewer for foul drainage only at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar). <u>Details of the proposed means of surface water run-off disposal to be in accordance with Part H3 of Building Regulations hierarchy as well as acceptable discharge points, rates and volumes to be agreed by the Lead Local Flood Authority, in consultation with Southern Water. [...]</u></i>	
32	Mike & Barbara Matthews	<ol style="list-style-type: none"> Policy HN3. Site 20. The respondents understand that this site has been rejected but are surprised that a 'tick' has been inserted re 'conservation', as they would have thought it clear that Park Lane, apart from inadequacy for access, going east is one of the few picturesque narrow banked lanes remaining in the village, and would be disastrous to widen for additional traffic and lighting. Policy DB1. Site 26. Can houses nos 7 to 16, and service road, be pushed a bit further uphill to allow for tree planting between houses nos 11 to 16 and nos 17 to 20, to act as additional screening to Hazeley Road and Surgery car park? Policy MA1. Walking and cycling. Would it be possible for the footpath along the B3335 between Twyford and Hockley Golf course to be widened and the grass bank cut back to allow the 	<ol style="list-style-type: none"> Your comment refers to the tick in Table 2 in the paper on the Housing Site Selection Process (shown in the Housing section of the TNP website). It is possible that a cross would have been appropriate in this column but this is a moot point as the site was eliminated early on as a potential development site, much for the reasons you mentioned, through this statement "The key objection at this stage was the inadequacy of Park Lane for access. This road is within the Conservation Area, has no footway, is single track, and is inadequate for emergency vehicles and cannot be improved." The layout for Site 26 shown on Map 14 (changed to Map 15) was developed to demonstrate the capacity of the site and how it might be developed but is not intended to be prescriptive or detailed. It is likely that the developer will have his own ideas on the site layout details including landscaping and these elements cannot be finalised within the TNP. However it is worth noting that Policy DB1 has been written to ensure that any revised or more detailed layout delivers expected benefits and includes comprehensive landscape provisions. As mentioned in the introduction to the Movement and Accessibility policies, transport decisions are made by other authorities and cannot be decided within the TNP. The most

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32	Mike and Barbara Matthews (cont)	<p>increasing number of cyclists to use this as a safe cycle track and therefore reduce the likelihood of accidents from using the main road, thus joining up with Winchester keenness for cycle tracks around the city.</p> <p>4. Policy MA2. Parking. Bugle pub visitors who use Park Lane for parking vehicles due to the small pub car park provided can cause obstructions to house entrances for residents and should somehow be warned of this.</p>	<p>that the TNP can do is to urge the Highway Authority to complete a cycle route through the village from Hockley traffic lights through to Colden Common as set out in Policy MA1.3 and reiterated in policy MA5.2. However you might like to note that the Parish Council has recently received funds to investigate the introduction of a cycle route from the village to Hockley. A small working party has been set up. Any progress will be reported back to the Parish Council and then to the Highway Authorities.</p> <p>4. Noted: Request TPC to discuss this with owner.</p>
33	Kevin Watson	<p>Policy BE3 & CP3.</p> <p>1. I think the plan is too harsh with the proposed restrictions on Twyford Prep School. The Prep school:</p> <ul style="list-style-type: none"> i). Is the largest employer in the village, providing work to many Twyford residents; ii). Is a major contributor to the village economy, bringing valuable business to the pubs, shop, pharmacy and other local businesses; iii). Educates many village children. The plan says “few” pupils are educated by the school. I think this should be checked, as I believe it completely incorrect and gives the wrong impression; iv). Has a strong connection with many Twyford families, either current or former pupils, staff or parents. The draft TNP states that “the inter dependence with the TNP area is not strong either in pupils or staff.” I believe this statement is also incorrect. 	<p>1. The school is a large employer and has 400 children, most of whom, employees and children, do not live in the village. They access and leave the property during prime commuting times. The PC supports the school developing, subject to it establishing a mitigation scheme to prevent all vehicle movement being further exacerbated. We note that TS have made the same point about the TNP and imposing excessive restrictions. We have responded at some length to reassure the school and explain the positive aspects of BE3 and the scope it gives to the school’s master plan. However, the constraints on future planning of the school are derived from multiple policies of the South Downs Local Plan; e.g. Historic Environment, Landscape, Traffic, etc. The site is highly sensitive for all these reasons and the level of activity of a 400 pupil school is intense and affects the village in a variety of ways, some positive, some negative. The reconciling of the multiple objections will we hope be achieved by the school’s master plan; to inform this plan, the objectives of the Community and the Planning Authority need to be clearly stated. Clarity should</p>

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33	Kevin Watson (cont)	<p>2. I accept that the Prep school brings some traffic disruption to the village, however I believe this is small in comparison to the number of vehicles passing through the village on the main road as a cut through to/from the motorway. The draft TNP gives the impression that the Prep School adds very little to the village and as a result it recommends a number of restrictions, on future development of the school. I believe all these restrictions are unreasonable and unnecessary. The school, which is a charity and major asset to the village, should be encouraged to continue developing (within normal planning guidelines) in the same way the plan supports the future development of Twyford St Mary's School.</p> <p>3. I suggest Policy BE3 should be removed and replaced with the same policy inserted for St Mary's School (Policy CP3).i.e.</p> <p>“1. Development which is for the maintenance and improvement of the School's facilities will be supported. 2. Measures to improve the access to the school will be supported”.</p> <p>4. In the same vein, I do not think it is appropriate to exclude the Prep School site from the Settlement Boundary. Having commissioned an independent report by Terra Firma I think the TNP should follow the report's recommendations without adjustment. To recommend excluding the prep school from the Settlement Boundary when it has been included for over 20 years and when the independent report recommended its continued inclusion seems an odd decision. I suggest the draft TNP is amended to reinstate those parts of the Prep School which were removed from the Settlement Boundary.</p>	<p>not be misinterpreted as hostility.</p> <p>Your points ii, ii and iv agreed and noted. TNP text revised</p> <p>2. Twyford School justifies a bespoke policy on account of its size, pupil numbers and the multiple sensitivities, all distinguish it from Twyford St. Mary's. The policy suggested would be little help in producing the criteria for the TS master plan, which is TS's clear objective.</p> <p>SDNPA welcomes the policy but recommends some modifications. Twyford School also asked for modifications but not its removal. The text has been revised and the policy modified to address concerns of all parties, although retaining its purpose and scope.</p> <p>3. This suggestion misunderstands the purpose of BE3 which is a permissive policy for the whole of the school site, subject to school purposes and a master plan. It replicates the permissive approach of the SB 1 & 2 policies in all other ways.</p> <p>4. SB1 Settlement Boundary: This change would impose a separate group of policies on one part of the school i.e. all those in SB1. The purpose of the special policy BE3 is to devise a framework for the school to plan its activities and future development on a comprehensive basis, and to do so for both the developed and undeveloped area. So BE3 replaces the SB policies and gives the school extra scope not less. The part of the school formerly within the SB, are the core buildings of original school and still in use for that purpose. Including them in SB would only make sense if the school were intending to put these buildings to alternative non-school use; however this would raise multiple other issues and is not, as TPC</p>

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33	Kevin Watson (cont)		Understand, what the school intends. In other words, the realigning of the settlement boundary provides development to take place in the school property as a whole rather than having two sections where two separate policies prevail. The Special policy is designed to permit development on the school site for school purposes within the context of a master plan and so get rid of the “outside the settlement boundary” complications eg for staff flats.
34	Kim Blunt, Planner of Southern Planning Practice Ltd on behalf of Mr and Mrs Gordon of Morestead Stables.	<p>1. Policy HN7.1c. We are a very successful racing stables and we are pleased that the Twyford Neighbourhood Plan are supporting us as the need for grooms /hostel accommodation is necessary to the welfare of the horses in our care, their training and the management of the racing stables. * currently 55 horses kept and trained at the stable yard * the training is undertaken by Mr & Mrs Gordon with assistance from x14 staff * the hostel accommodation is treated as temporary accommodation by staff that occupy it * the hostel accommodation is necessary due to the scale of the enterprise, the value of the horses in the care of the stables, the number of race meets that take Mr & Mrs Gordon and head girl and head lad away from the stable yard, including to Ireland, Bangor and Aintree</p>	<p>1. Support is welcomed. Additional evidence is noted.</p>
35	Frank Henry	<p>1. Policy HN3 & MA2. I am concerned at the possible provision of additional car parking for 40 vehicles in the area adjacent to the current Parish Hall Car Park. I am unconvinced about the need for so many spaces, and also concerned that it will be used for park and share activities for commuters coming from outside the village. I was advised that only 20 spaces would be made available in the first instance, and additionally, that as the land would be effectively owned by the Parish Council, that time restrictions could be easily implemented if day long parking by commuters became a</p>	<p>1. As the respondent has noted, only 20 additional spaces will be built in the first instance. The remaining land will be landscaped and controlled by the Parish Council. It will remain available for the future 20 spaces to be built. TPC will also manage the new car park to ensure it is made best use of for villagers. The 40 spaces are very likely to be needed to enable the Parish Hall to fulfil its potential as time has passed business use in the centre has increased and parking has decreased.</p>

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35	Frank Henry (cont)	<p>problem. I think this (limited spaces and potential parking restrictions) should be recognised and included in the text of the plan.</p> <p>2. Policy HN4. It should be made clearer in the plan that any provision of affordable housing to people with local connections is for rental purposes only, and that such affordable housing cannot be sold to tenants.</p> <p>3. Policy MA3. At the exhibition, there was discussion about traffic calming measures at Norris' Bridge, including signage, road markings and virtual footpaths on the bridge. I would feel strongly that this should be avoided as much as possible to preserve the rural and natural look of the bridge and surrounding area. If traffic calming measures are required, I suggest a 20MPH speed limit in the approach to the bridge from Shawford, and, given the narrow and heavily parked nature of the road, this should continue to the traffic lights in the centre of the village.</p>	<p>2. TPC has the same ambition, but must take account of National and SDLP policy while the Twyford connection should be achievable, "Affordable Housing" includes housing for part ownership as well as rental, Note that 50% affordable is the highest on any Hants Authority.</p> <p>3. Comment noted. The problem is finding the right balance between maintaining the rural appearance and yet providing a bit more protection for pedestrians as this is the one gap in the footway between the village and the railway station. If we can get support from HCC any proposals will then be subject to consultation.</p>
36	Sonia Watson, Secretary, on behalf of the Trustees of Twyford Parish Hall	<p>Policies DB1, WE1 & 2.</p> <p>The Trustees of Twyford Parish Hall are grateful for the many protections and supports offered to the hall within the planning framework proposed by the TNP.</p> <p>As part of this consultation the Trustees would like to raise the following issues in relation to the exception site 26 (land adjacent to Twyford Parish Hall) and the proposed development of 20 houses on this site. As is documented in the plan, the parish hall and its car park are vulnerable to the periodic exceptional flooding that can occur in Twyford, with the Gilbert Room being totally flooded in 2014 leading to 6 months of closure and approx. £80k restoration by insurers, who indicated that another flood would render it uninsurable. It was also Flooded in 2001.</p>	

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36	Sonia Watson, Secretary, on behalf of the Trustees of Twyford Parish Hall (cont)	<p>TNP identifies a number of conditions for the development of site 26, as set out in policies DB1, WE1 and WE2 amongst others. These include:</p> <ul style="list-style-type: none"> • Contributions to drainage improvements where connections to existing drainage take place • Applications must have an approved drainage plan showing how connections will be made to existing sewers with capacity, or • a small plant processor will be used • There must be safeguards on foul drainage from the site • A solution to wider flooding (east of B3335) needs to have been agreed prior to development of site 26, as set out in WE1 • Financial Contributions (via CIL?) must be made by the developer to the agreed flooding solution referred to above <p>1. <i>Issue 1:</i> how does the Parish Council propose to ensure that these conditions are in fact met? The matters referred to are detailed and complex and developers are notorious for either reapplying to avoid conditions imposed, or appear to meet complex conditions but in reality not provide robust solutions. The Trustees are concerned development of site 26 is a high risk solution given how vulnerable to flooding this part of the village is.</p>	<p>1. This response will be aware of TPC's initiatives in commissioning Consulting Engineers to design a flood mitigation scheme; this incorporates significant protection for the Parish Hall and its car park from the Hazeley Bourne. It is possible that the Parish Hall and its car park may need additional works to fully protect them from all forms of flooding. The financing of the FMS is being actively progressed between the landowners, HCC, WCC and SDNPA with TPC taking the lead.</p> <p>In its approach to resolving the existing flood problems, the Mayer Brown scheme enables costs to be minimised and broken down into a series of works as necessary finance becomes available. The FMS is not primarily the responsibility of the landowner and developer of Site 26 but of the Authorities. The landowner is able to facilitate the scheme and has confirmed in writing that he will do so. The developer will have a short length of the FMS to install, which is an integral part of his ground works. So, while some risk of course remains, the TPC's initiatives on the FMS appear to fit in with the interests of all parties, and do not impose excessive costs on any single party.</p>

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36	Sonia Watson, Secretary, on behalf of the Trustees of Twyford Parish Hall (cont)	2. <i>Issue 2:</i> in addition to the drainage and foul water removal issues referred to above, the area is at risk from run-off water from site 26 during heavy rains. Development of this site with the attendant hard surfaces is only likely to increase the amount of run-off. A development condition on site 26 to minimise the risk from water run-off is required.	2. Building on Site 26 does not increase flood risk to any significant degree. Site 26's additional run off would be as a result of intense rainfall over short periods for which there are standard design requirements set by the Environment Agency and which allow for climate change. In contrast, the flooding of Hazeley road and the car park occurs from springs which rise only after long periods of rainfall, and are independent of the short periods of intense rainfall for which development is required to design. Flooding as a result of these springs occurs, at rare intervals, perhaps once in every 12 years, and continue at high volumes for up to a month. The likelihood of the short period of intense rainfall, for which development has to cater, occurring during the same four week period of a 12 year flood event is beyond the normal calculation of flood risk and is small compared to the flood flows. As the Hazeley road drains are sized for the flood event, it appears that they will be more than adequate for short periods of intense rainfall which may run off this small housing site. In addition, as a normal part of the planning application, a Flood Risk Assessment will be required and if considered necessary the developer will be required to construct independent storage/attenuation measures to demonstrate that storm water discharge volumes from the development into the existing drainage system do not exceed the greenfield run-off. In this respect, South Downs Policy SD50 on sustainable drainage is applicable.
37	James Iles, Director, Pro Vision for The Humphrey Group.	Separate document	Response given in separate document
38	Sonia Watson	Policies SB1, BE3, MA5, LHE6, WE1, & DB1. 1. SB1 Settlement Boundary: I think to individual properties the consequences of being inside or outside the settlement boundary	1. The Settlement Boundary proposals were publicised on receipt of Terra Firma's report in 2016/17 and discussed at the 2017

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38	Sonia Watson (cont)	<p>are significant. Despite this being the second consultation, I don't think most villagers have properly engaged with the changes proposed and how it effects them, and I think it should be separately publicised. It's currently buried within a large document, albeit it comes fairly early on. I also do not understand why some changes not recommended by Terra Firma are being proposed. The Terra Firma summary of changes is on the website but I could not find their justification of these changes.</p> <p>2. BE3.Twyford School: As an ex parent of both schools in the village I believe that both schools provide economic and social benefit to the village, and the TNP should be seeking to provide support and protection to both schools as part of the planning framework. The current draft recognises this for Twyford St Marys (TSM) but not for Twyford School (TS). I see the unrecognised benefits of TS as:</p> <ul style="list-style-type: none"> a) Increasing the appeal to families settling in the village by providing a choice of schools, more village children have attended and currently attend TS than the 'few' recognised in TNP b) Providing employment opportunities at the school eg catering, cleaning, gardening as well as teachers c) Parents and staff utilising the village facilities namely shop, café, pubs, surgery, dentist, pharmacy, hall etc d) TS sharing facilities, teacher training and guest speakers with TSM e) Headmaster of TS supporting governors in recruitment of new head for TSM f) Music department supporting church activities 	<p>public consultation (See comments and responses on Your Views page of TNP website). These together with the methodology used were then further publicised, soon after, on the Housing page of the TNP website. The proposal with changes has now been published for comment again and will be further publicised later in the year. The main line of the boundary continues that of the earlier Winchester Plan. The re-assessment has been carried out using criteria applied by SDNPA for their own local plan. The change to the Twyford school boundary is explained in response No. 33 (8) to Kevin Watson.</p> <p>2. The benefits of Twyford School to the community are recognised:-</p> <ul style="list-style-type: none"> a). The figure given for local children attending TS is 47 which is 12% of the total. b). The figure given is 30 which is 25% of total employment but this is number is from postcode SO21 which includes several other parishes besides Twyford. b –f) Points noted. The explanatory text has been revised to acknowledge these multiple interactions.

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38	Sonia Watson (cont)	<p>3. Whilst TS should always be encouraged to increase its support of the local community, I fail to understand why TNP is seeking to restrict the schools chance of success with overly onerous planning constraints.</p> <p>4. Both schools cause traffic issues, but I appreciate they are worse at TS. TS should be encouraged to pursue policies to minimise the traffic movements (car sharing, minibus routes etc) but really the TNP and TCP should engage with TS over its outline masterplan to provide land for widening of Bourne Lane to see if a satisfactory solution can be found, not just seeking to restrict the operations and development of the school. It should also be recognised that TS is not the only contributor to poor traffic in Twyford in the rush hour, with through traffic increasing rapidly. This will increase with the proposed long term roadworks for smart motorway installation J9-14 on M3, and permanently increase if 5,000 new houses are built near Fair Oak. TNP has surprisingly little to say about how this traffic should be controlled over the next 15 years.</p> <p>5. Policy MA5. I strongly support the provision of a cycle way from the village to Hockley via Hockley cottages and the reduction of the speed limit on the full length of this road from national speed limit to 40mph to facilitate this and improve safety at Hockley cottages.</p> <p>6. MA5: Pedestrian access from Hazeley Road to Bourne Fields is identified, but why is pedestrian access from High street (near Church Lane ie bus stop) to Bourne Fields not included, since this is the route for school children to catch school buses?</p> <p>7. Policy LHE6: I support the efforts to maintain and increase dark skies in Twyford</p>	<p>3. BE3. TNP brings together the multiple policies of SDLP which apply to this site. These are central to the neighbourhood plan vision – sustainability, reducing car reliance, historic fabric, National Park landscape, impact on communities, etc. All are of significance in TNP terms as well as being of importance to the local community. Note that SDNPA support and welcome this policy. BE3 is a permissive policy giving the school wide scope for development and improvement, subject to the master plan and being for school purposes. TPC has always co-operated with TS and awaits discussion on the school's master plan.</p> <p>4. As to the wider traffic issues, sadly the TNP has NO jurisdiction over policies of Hampshire (relating to roads), Eastleigh (proposed new homes) or central government. However TPC was an active participant and contributor to the Eastleigh Local Plan proposals.</p> <p>5. MA5: Comment noted. It is possible that the provision of an improved cycleway and the 40 mph restriction may occur together as HCC do not accept cycleways alongside 60 mph sections of road. RP</p> <p>6. MA5. Accepted – this is another section of footway that could be included in our Aspirational Policy MA5. However, with 7 ownerships on the north side and only two on the south side, this footway may have to rely on land from Twyford School.</p> <p>7. Noted and support welcomed.</p>

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38	Sonia Watson (cont)	<p>8. Policy WE1: I appreciate and support the strenuous efforts TNP and TCP are undertaking to identify and provide solutions for the flooding that has twice seriously impacted the low lying areas of the village, particularly Hazeley Road East of the traffic lights.</p> <p>9. Policy DB1 site 26: The high number of conditions requisite for development on this site, makes me question if it leaves it economically viable to any developer. Unfortunately all of the conditions are vital because of the nature and location of this site. How is TPC going to ensure that SDNP will stand firm on the essential conditions set out in TNP, without which development here could be a disaster.</p> <p>10. Has consideration been given to ensuring that any development will not overlook the school playground which adjoins this site? I've no idea what the legal requirements may be, but its certainly not desirable to create new housing that overlooks a playground. It may be that topography is sufficient protection, but that is not clear from the information available.</p>	<p>8. Noted and support welcomed.</p> <p>9. This is not a question which can be answered with absolute certainty until the planning application stage. It is affected, for instance, by the COVID impact on the market, and by the SDNPA requirement for 50% affordable housing. However, a number of factors are working together to ensure the viability of the scheme:</p> <ul style="list-style-type: none"> • Some conditions require land to be set aside for other uses, but this is not a cost as it is owned by the same landowner • TPC and the Authorities are seeking to minimize costs of the flood mitigation • Twyford house prices command a premium especially in this part of the village. <p>In addition the landowners have worked closely with the Parish Council to secure its implementation on the basis of TPC's layout and brief as set out in DB1.</p> <p>10. It should be noted that Twyford School has erected a 6' fence and that the new housing is on sloping land below the school and faces south. Any overlooking would be from first floor windows. TPC is not aware that the overlooking of school playgrounds is a basis for objection; it has not been raised by the school itself. (Note Twyford Primary has multiple properties overlooking from ground and first floor).</p>
39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman.	<p>Policies SB1, BE3, MA3, CP2. I am writing in my capacity as Chairman of the Governors of Twyford School. The Governors' role is to safeguard the charity with its long history of education in Twyford and we are raising the following comments based on what we see as inaccuracies and bias in the current document.</p>	

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont.)	<ol style="list-style-type: none"> 1. Having carefully reviewed the latest draft, we are very surprised to see that the way the school is referred to and treated in the plan in is noticeably negative and more so than in the first consultative draft. The officers of the school believe they have provided full information and support during the compilation of the plan to date, providing regular feedback as required and comments between the two consultative drafts. <p><u>Background</u></p> <ol style="list-style-type: none"> 2. In the latter part of the last century, the School grew from about 100 pupils to its current size of close to 400 pupils. 3. We are proud to be a major employer in the village and the surrounding areas and we believe we currently educate about a fifth of the primary age children in the Parish and immediately surrounding area. 4. The School is integral to the local community, a major employer, and contributor in the local supply chain. In late 2018, using an Economic Impact Tool developed jointly by the Independent Schools Council and Oxford Economics we calculated the school contributes £10.5m to UK GDP of which the local impact is assessed at £6.6m. <p>An estimated 226 UK jobs are supported by the school's activities of which an estimated 148 jobs are in the Winchester local authority. The total UK tax supported by the school is estimated at £3,064k and the school saves the UK taxpayer £2,423k as a result of the attendance by pupils who could otherwise take up a free UK state school place.</p> <ol style="list-style-type: none"> 5. The plan repeatedly says, and its policies imply, that Twyford School provides little economic or social benefit to the village. We do not believe this is correct because: 	<ol style="list-style-type: none"> 1. It is not the intention of TPC/TNP to be negative about the school; quite the opposite. The policy is permissive and so directly supportive of school activities. We accept the phrasing of policies may give the opposite impression to their permissive character. The supporting text has been modified to take account of points made in the TS comments. 2. Agreed. 3. Noted. 4. Noted. 5. The Parish Council believes the introductory text to the Policies describes the state of the school in a factual and non-judgmental manner. No inference is made anywhere,

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont.)	<ul style="list-style-type: none"> • Forty-seven children from the parish are currently educated at the School. We believe having two schools in the village is a factor in distinguishing Twyford from other local villages. • We employ approximately 120 people, 30 of whom live in the SO21 1 area, so not only are we the village's largest employer, we may be the largest employer of Twyford people. • We use local contractors wherever possible, some of whom are located in the parish. • We share facilities, training and visiting specialists with Twyford St Marys where practicable, and our head teacher has recently completed a period as governor to St Marys, specifically supporting the recruitment of a new head teacher for St Mary's. • Our staff, parents and visitors make regular and frequent use of Twyford's facilities, namely the shops, cafe, pubs, surgery, pharmacy, dentist and village hall. <p>6. In this context we do not believe the role of the Twyford Neighbourhood Plan should seek to place commercial limitations on the school, which is what BE3 is seeking to do.</p> <p>Having carefully reviewed the latest draft, we offer the following comments and recommendations.</p> <p>7. Policy SB1</p> <p>Terra Firma did not recommend changes to the settlement boundary within Twyford School so please remove this change that you have introduced in the current draft and keep the boundary as recommended by Terra Firma in February 2016. This is consistent with the conservation boundary.</p>	<p>nor implied, that the school provides little economic or social benefit to the village. However, please note that the text has been modified to make clear TPC acceptance of the TS contribution to the economy and education of the village. The points made about the economic and social benefits of the School are noted.</p> <p>6. The TNP places no commercial limitations on how the school will evolve, but that development, as it occurs, mitigates against any potential negative impact that might arise. (see further below). The NP has to confine itself to land use considerations and it is these that it focuses on. These are bound to have a commercial impact which those affected will need to take into account.</p> <p>7. Removing this change would impose a separate group of policies on one part of the school i.e. all those in SB1. The purpose of the special policy BE3 is to devise a framework for the school to plan its activities and future development on a comprehensive basis, and to do so for both the developed and undeveloped area. So BE3 replaces the SB policies and gives the school extra scope not less. The part of the school formerly</p>

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont.)	<p>Policy BE3</p> <p>8. See TNP next column</p> <p>1 (School). We believe the School's Master Plan is designed to deliver objectives under SD34 (Sustaining the Local Economy) subparagraphs 1 (e) and 1 (f). We are concerned that restrictions in Policy BE3 place unreasonable requirements on the development of the school.</p> <p>9. 2. Specifically:</p> <p>a. Para 1 (a) should include the words "where practicable" or should be deleted.</p>	<p>within the SB, are the core buildings of original school and still in use for that purpose. Including them in SB would only make sense if the school were intending to put these buildings to alternative non-school use; however this would raise multiple other issues and is not, as TPC understand, what the school intends. In other words, the realigning of the settlement boundary provides development to take place in the school property as a whole rather than having two sections where two separate policies prevail. The Special policy is designed to permit development on the school site for school purposes within the context of a master plan and so get rid of the "outside the settlement boundary" complications eg for staff flats.</p> <p>8. TPC had hoped that the school's master plan would have been settled earlier in the process of preparing the TNP and so would have informed the policies for the school. In the absence of an agreed plan, TNP brings together the policies of the SDLP, and applies them to the school site in a bespoke policy. Given the size of the school, and the numbers of pupils, and the multiple structures on the site, planning policies are bound to continue to constrain the options for the school as they have in the past. The master plan will be the vehicle for reconciling the objectives of the school with those of the Planning Authority. The main SDLP policy which provides TS with its policy framework is SD 43 (1). Community Facilities. As para 7.227 states, this includes Education. Policy 34 is directed to businesses and commerce, so is not the one to give guidance to the school.</p> <p>9. TPC had thought that the reduction in traffic and its impact on local roads was agreed as a common objective. It remains central to agreement of the future development of the school.</p>

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont)	<p>10. b. Para 2 (a) should be deleted</p> <p>11. c. Para 3 is an unreasonable limitation and should be removed</p> <p>12. d. The site boundary, for the purposes of this policy, should include the playing field known as Home Close Field (see below)</p> <p>13. Policy MA6 – Historic Rural Roads</p> <p>1. We are aware that SD21 defines a Historic Rural Road as “..those roads outside towns shown on the second edition of the Ordnance Survey, which have not undergone significant widening or straightening in the intervening period.”</p>	<p>The inclusion of “where practicable” is not required. When submitting an application for development, the impact on transport etc. requires to be recognised and therefore the Master Plan ought to contain all these matters and explain what mitigation has been considered.</p> <p>10. This is deleted from the policy as BE3 1 (a) covers the major objective. It will be moved to the explanatory text to explain the purpose of the policy.</p> <p>11. Policy to be reworded to indicate that building development within the prep school should take place within the close proximity of the current buildings and to the northern section of the site. Again this is something which we had understood informed the TS approach to the planning and development of its site. There are several reasons for instating this:- for instance, to maintain the aspect of the listed buildings and to maintain the open character of the south and east parts of the site. SDNPA have raised both points in its comments on TNP’s proposals for housing on site 26 (see TNP DB1).</p> <p>12. Agreed to the boundary of the Special Policy Area to include Home Close.</p> <p>13. MA6 Historic Rural Roads</p> <p>1. Bourne Lane is a historic lane. Its status cannot be altered because it carries more vehicles.</p>

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont)	<p>2. While Bourne Lane may be considered to fall into this definition, the extended development of Twyford means that it is arguably no longer 'outside a town'. Indeed, it is now a busy thoroughfare for the new housing to the NE of Twyford School, Abbeyfield, the School as well as traffic bypassing the centre of the village.</p> <p>3. We believe these recent changes in the neighbourhood plan regarding Bourne Lane are in response to Twyford Schools draft outline plan which has been shared with the community. As a result, the current neighbourhood plan no longer even recognises the issues that already exist in Bourne Lane and is apparently seeking no change despite lack of facilities for pedestrians and substantial number of people now living in Bourne Fields.</p> <p>4. We note changes to MA5 and BE3 to remove references to widening and improving Bourne Lane. We also note a change to the Policy SB1 in the Plan to move the Settlement Boundary to the North side of Bourne Lane.</p> <p>5. We request that:</p> <p>5a. Bourne Lane should be removed from the list of Historic Rural Roads in Policy MA6</p> <p>b. References to the need to improve Bourne Lane, previously included in Policies MA5 and BE3, should be restored.</p> <p>c. Bourne Lane remain within the Settlement Boundary because it is bordered by business on one side and housing on the other.</p> <p>14. Policy CP2 Community Facilities</p> <p>Please remove Twyford School as a community facility. It was not included as a community facility in Neighbourhood Draft 1.0 There are other charities in the village that are not included here, e.g. Abbeyfields, so it is unclear why we are included here.</p>	<p>2. The widening of the road was removed from the document as it is not a matter that the TNP is in a position to settle. It should be dealt with in the context of the Master Plan. The "rural roads/historic lanes" policy is one of SDLP's which TNP has applied to all the historic lanes in the TNP, not only to this part of Bourne Lane.</p> <p>3. TPC acknowledge that Twyford School has shared plans illustrating new access arrangements affecting Bourne Lane and publicized these. However they are disputed strongly by a part of the Twyford community and have not progressed to the point where the Parish Council could make a balanced judgement. For these reasons it is inappropriate to pre-judge the issue which will be dealt with in due course through the planning application.</p> <p>4. The drawing of the settlement boundary along the north side of Bourne Lane does not appear to have any consequences for policy.</p> <p>5. See responses above.</p> <p>14. Community Facility</p> <p>There is nothing negative attached to this section. The inclusion of the school here is that it provides education to children of the village should they wish to attend. They are an essential and indispensable feature of any area. Services such</p>

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39	Charles Gillow, Bursar & Clerk of Governors for Colin Howman, Chair of Governors for Twyford School. (cont)	<p>15. <u>Conclusion</u></p> <p>Twyford Prep School has been a significant part of the Village for over two centuries and supports the community economically, educationally as an employer and culturally.</p> <p>The Governors recognise the importance of the TwyfordNeighbourhood Plan in setting the policies for Twyford for the next fifteen years and thus determining how planning applications will be decided. We have actively supported the development of this Plan, commenting on draft proposals circulated in the approval and adoption process.</p> <p>We hope we will receive constructive feedback on our comments above. These comments and recommendations are offered in the spirit of our continued active support for Twyford as we plan our mutually beneficial development over the coming decade and more.</p> <p>Next Steps. As requested, we are providing these comments to enable final amendments before you submit the plan for approval to the South Downs National Park Authority (SDNPA). We look forward to the neighbourhood plan team engaging with the school to provide feedback on our comments, via the Clerk to the Governors (Bursar). We trust we will reach agreement on changes so that there will not be a need to raise our concerns directly with the planning inspector, when appointed.</p>	<p>as education, health, social services, libraries, the Police, Fire and Ambulance services all help to support the quality of life in a community.</p> <p>Identification as a Community Facility is one reason for justifying the enabling aspects of BE3; without the special policy for the school planning policy would be much more restrictive. Note that SDLP policy 43 (i) includes all schools as Community Facilities.</p> <p>15. TNP are grateful for TS thoughtful and considered comments. We have changed the text considerably and hope that it is clearer to the village in multiple ways. TNP hope TS appreciates the positive intentions of BE3 and that it will help TS frame its master plan.</p>

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40	Miss Stephanie West	<p>Policy HN3</p> <ol style="list-style-type: none"> 1. I completely agree there is a need for more affordable housing in Twyford and the mix seems appropriate although it is a shame there won't be more bungalow style housing to allow the older generation to downsize within the village therefore increasing movement in the housing market. 2. I feel that it is disappointing that Northfield has been excluded as a site and that the main decision seems to hinge on increasing car parking and therefore traffic movement is an already busy area. And also in an era where we should be trying to reduce the use vehicles and increase more environmentally friendly options such as improving cycling pathways/ pedestrian walkways. 3. Also of note is that the part of the flooding system that has the most impact is along Hazeley road. I am sure most of this work can be undertaken without actually having to build on the land and in fact building on that land will increase the flood risk without mitigation rather than reduce it. 	<ol style="list-style-type: none"> 1. Support for mix and affordable housing is welcomed. The provision of 20 houses is not sufficient to provide for all village needs on this allocation. Alternative provision is made for the elderly by policies HN6, HN7, and HN8 as well as HN4 & 5. 2. The full reasons for site selection are set out in TNP website Cycling/pedestrian provision is a key objective of TNP. It is not an alternative to additional parking provision. 3. Building on Site 26 is unlikely to increase flood risk to any significant degree. Run off design for development, has to cater for intense rainfall over short periods for which there are standard design requirements set by the Environment Agency and which allow for climate change. Flooding of Hazeley road and the car park occurs from winterbourne springs which rise only after long periods of rainfall, and is independent of the short periods of intense rainfall for which development is required to design. Flooding as a result of the winterbourne springs rising occurs at rare intervals, perhaps once in every 12 to 20 years, and continues for up to a month often in periods of low rainfall. The likelihood of the short period of intense rainfall, for which development has to design, coinciding with the same four week period of a 12 year flood event is beyond the normal calculation of flood risk and involves small volumes compared to winterbourne flood flows. As the Hazeley road drains, downstream of Site 26, are sized for the winterbourne flood event, they should provide more than adequate capacity for the short periods of intense rainfall which may run off this small housing site in a flash flood. In addition, as a normal part of the planning application, a flood risk assessment will be required and, if considered necessary, the developer will be

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40	Miss Stephanie West	<p>4. Also my understanding is that the offer of site 1 also came with an offer of £250000 donation which could have contributed significantly to the flooding project. This seems to have been completely dismissed.</p> <p>Policy DB1</p> <p>5. Unfortunately the Huw Thomas photo montage does not look like the houses are in proportion, I understand there is perspective involved but even then properties that would be at a similar level to the trees look proportionally too short.</p> <p>6. I also note that the outline plan of the proposed developers' website is significantly different to the one the neighbourhood plan is suggesting to people which I worry is misleading.</p> <p>7. More consideration should have been given to splitting the build of 20 houses across both sites (S1 and S26) in order to just build in the western part of Site 26 as originally recommended. This could have also involved gain parking which seems to be the main focus.</p> <p>8. It is also really important that any future car parking redesign provides for bicycles and electric cars especially given the government's recent announcement.</p> <p>Policy MA3.</p> <p>9. It is a shame that more can't be invested in traffic calming and I wonder if some of this could be tied in with the building of new houses.</p> <p>10. MA1. I think the plan should be more specific on how cycling paths and pedestrian access can be enhanced within the village.</p>	<p>required to construct independent storage/attenuation measures to ensure that storm water discharge volumes from the development into the existing drainage system do not exceed the greenfield run-off. In this respect, South Downs Policy SD 50 on sustainable drainage is applicable.</p> <p>4. £250,000 offer was made at the site selection stage for parking measures in the village centre not for flooding. It was subject to conditions. It provided neither for flood mitigation nor off street parking.</p> <p>5. Disagree. This was looked at carefully by Parish Councillors and agreed as reasonable.</p> <p>6. This comment is not fully understood. It seems to refer to the website of a third party.</p> <p>7. See remarks on site selection above under (2); this also considered splitting the allocation between Site 1 & Site 26. Parking is one main objective but not the overriding one.</p> <p>8. Agreed.</p> <p>9. Possibly. New housing has to make a development contribution (called CIL). The parish may be able to persuade HCC to spend some of this money on traffic calming measures.</p> <p>10. The main emphasis is to complete a north-south cycle route through the village. Elsewhere we have to be careful to protect Historic roads.</p>

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41	Mrs Sarah Tose Principal Planning Officer & Team Leader for SDNP team at WCC.	<p>Policies HN6 part 3 (ii), HN7 part 1 (b) & (d), ST1 part 2 (a), WE1 part 4 & MA2.</p> <p>Policy HN6.</p> <ol style="list-style-type: none"> Under the 'Further explanations' section on page 20, the second point is spelt incorrectly as '(li)' instead of '(ii)', and the third point is '(ii)' but it should be '(iii)'. The third point, shown as '(ii)' on page 20 states: 'replace any trees removed immediately prior to development'. It is suggested that this is amended to 'trees should be replaced in the first planting season following the completion of the development' as if trees are planted prior to development they may get damaged during the construction process and may not be able to be properly protected. Also this may prove a bit restrictive for the developer as they will have to wait for the next available planting season before they can commence the works. Part '(iv)' states that provision should be made to upgrade roads etc. prior to development- does this mean that the upgrades should be carried out prior to the commencement of development? It is suggested that prior to occupation would be a more reasonable trigger, to enable the works to be completed before the improvements are made <p>Policy HN7</p> <ol style="list-style-type: none"> Part 1(b) of policy HN7 states that only annexes for relatives will be permitted. Does this mean that applications for additional guest accommodation will not be allowed? We receive quite a lot of applications for annexes for occasional use for friends or family members to stay in when they visit, rather than a 'granny annexe' as such that is occupied by a relative full time. We agree with the principle but question whether this may be a bit restrictive. Currently we use planning conditions to prevent annexes from being used independently and from being sold off from the host dwelling but we note that policy HN7 states that legal agreements must be entered into. Applicants will have to pay additional fees for 	<ol style="list-style-type: none"> Agreed. Amended Plan Agree with comments made: Delete and rely on landscape plan. Agree with comments. Amended policy. Agree with comments. Amended policy.

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41	Mrs Sarah Tose Principal Planning Officer & Team Leader for SDNP team at WCC. (cont)	<p>this and the process will delay a planning decision by quite a while in some cases. We therefore wondered why legal agreements have been chosen over the use of planning conditions.</p> <p>5. Part 1(d)(i) states that the subdivision of large houses may be permitted where the proposal is to the benefit of the special qualities of the SDNP and the community of Twyford. It would be helpful to expand on this point, as we are unsure how the subdivision of a large house would benefit the local community- do you mean in terms of how a proposal could enhance the local area e.g. biodiversity, landscape improvements?</p> <p>Policy ST1</p> <p>6. Part 2(a) of policy ST1 states that outside the settlement boundary, tourist accommodation will only be permitted if a need can be demonstrated for the facility in that location. It would be useful if this can be explained further- what evidence would an applicant need to submit to demonstrate that there is a need for holiday lets in a particular location? If a proposal is located near to an existing attraction then would that provide sufficient justification? What if the proposal is just a small scale facility comprising shepherds huts in a remote part of the Park for walkers/cyclists- how would the need be demonstrated in that case.</p> <p>Policy WE1</p> <p>7. Part 4 of policy WE1 states that development should contribute to the mitigation of existing sewage and storm drainage problems but it does not provide any details of what the contribution would be. As planning officers assessing an application, we would be unable to advise applicants of the requirements of this part of the policy.</p>	<p>5. Comments noted, and similar to those of SDNPA: Amended policy.</p> <p>6. TNP have reconsidered the approach to tourist and holiday accommodation. Generally there is a good range of accommodation within Twyford itself or close by in the many surrounding settlements adjoining the Parish, which also provide for those visiting the National Park. Further provision may be made within the existing settlement or by conversion of farm buildings. However, isolated footloose new build is contrary to sustainability objectives. In the absence of any evidence of demand from established visitor attractions no other provision is made. See Appeal decision at Morestead.</p> <p>7. WE1.2 amended to read “Twyford Parish Council in partnership with HCC as Highway and Land Drainage Authority, will bring forward a flood mitigation scheme to the east of the B3335 and</p> <ol style="list-style-type: none"> 1. development will be approved provided it incorporates the requirements of the scheme 2. development in the area affected by flood should only come into use when provision has been made for flood mitigation measures “ <p>TPC in partnership with HCC has commissioned the design of a flood mitigation works with costings. This scheme forms the basis for detailed discussions on financing which inform the application process for Site 26 and the application of this policy (as revised).</p>

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41	Mrs Sarah Tose Principal Planning Officer & Team Leader for SDNP team at WCC. (cont)	<p>Policy MA2.</p> <p>8. Policy MA2 states that parking will be provided in accordance with the standards of HCC and WCC. However, the WCC standards do not apply to the part of the District that falls within the National Park. I believe that the SDNP are currently in the process of preparing a SPD on parking.</p>	<p>8. In the absence of any parking standard or advice from SDNP the WCC (residential) and HCC (all other land uses) standards should apply.</p>
42	Mrs Hilary Baker	<p>Policies MA1, 3 & 4.</p> <p>1. MA1. Could consideration be given to provision of pedestrian/cyclist crossing points (Pelican/Toucan crossing) at the junction between White Shute Lane and proposed new road from B3335 to Northfields Farm/Hazeley Enterprise Park allowing safe crossing of the B3335.</p> <p>2. MA3. There may be a need for continuous white lines along the B3335 from the Hockley Cottages along Cox's Hill leading towards the village to allow safe access onto and off the main road by residents.</p> <p>3. MA3 & 5. At the proposed new junction on Cox's Hill between White Shute Lane, B3335 and new road linking Hazeley Enterprise Park, could plans include tree planting scheme to provide screening of residents homes from this new junction/roundabout.</p>	<p>1. If the new HEP/Northfields link is implemented the junction with the B3335 will be required to contain adequate pedestrian facilities.</p> <p>2. A matter for HCC and their Road Safety team. There are already double white lines from north of Hockley Cottages to the top of the bus lay-by at the top of Cox's Hill, those to the north are solid on both sides whilst those on Cox's Hill have the 'offside permissive' lines (i.e. broken on one side). The introduction of these warning lines relates to the speed of traffic using the road and any future changes in speed limit should precipitate a review by HCC.</p> <p>3. MA3 & 5: if implemented it is likely the new link will contain extensive landscaping.</p>
43	Christopher Pope	<p>Policies CP1, LHE2 Table 3, LHE5, MA4, MA6, PO1, & aspirational policies.</p> <p>1. CP1. The Churchyard is a relevant Open Space that perhaps should be mentioned here. It is a convenient, accessible space with good views offering a facility as a community lung. Neighbouring the SSSI it provides a corridor for wildlife to get into the village and should be included in any plans for the enhancement of our village ecology.</p>	<p>1. It is included in Table 1 and Map 10. Amend Map 10 to define boundary.</p>

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43	Christopher Pope (cont)	<p>2. LHE2, Table 3, designated landscapes including major gardens. Perhaps the owners of the gardens of Twyford Lodge and Hockley House might prefer them not to be lumped into a single/combined bullet point.</p> <p>LHE5. I agree with the thrust of this policy, but can we please be more specific about TPC's role in "promoting schemes of (tree) planting". We should be prepared to state particular strategies, objectives and targets that will be deployed to rectify the deficit accumulated over recent decades in our tree cover, to ensure that future Twyfordians are not left with a sparse, spindly and unimaginative residue of hedgerow trees.</p> <p>3. MA1. The discussion here does not include consideration of areas in the village where the limitations of our road and footway system actually present significant RISKS TO LIFE. I regard these as so important as to require explicit identification as such in this plan. Doubtless plan authors will have their own nightmares and near-death experiences, but any list of locations should include: The stretch of road across the river, from the end of the footway in Finches Lane to the point where the footway resumes in Shawford Road, including Norris's Bridge. On the western side of the High Street between the junctions with Brewers Lane and Park Lane.</p> <p>4. MA4. I cannot but imagine that the proposed new road providing access from the B3335 into Northfields Farm/Hazeley Enterprise Park would add significantly to the traffic passing Hockley Cottages. This looks like an invitation to southbound truckers to bolt up to the Enterprise Park from M3/J11 and not bother to follow the recommended route via M3/J10 and the Morestead Road. There is the prospect of it further increasing the volume of northbound heavy traffic in the village (labouring up Serles Hill emitting particulate matter over the hedge into the Pre-Prep School playground) since it will no longer need to turn right at the cross-roads and congest traffic on the built-up end of Hazeley Road. The TPC should NOT incorporate this proposal into the TNP.</p>	<p>2. TNP amended to separate them in Table 3.</p> <p>LHE5: Tree Planting: The desirability of tree planting generally as a means of combating climate change is acknowledged by TPC. TPC is currently considering what initiatives to take, e.g. planting more trees on its own land, protecting more existing trees or working with landowners. Tree planting has significant effects on its own and may compromise either objectives e.g. keeping the existing character and ecology of downland (an open landscape), or of the valley plain (marsh, meadow with specialised ecology). The use of tree planting to restore ancient landscape e.g. hedges and verges would fulfil multiple objectives.</p> <p>3. MA1. Comments noted. Yes in fact it is Policy MA5 which contains a number of the 'pinch' points in the village. However other residents take a contrary view on say, a virtual footpath being painted along one side of Norris Bridge. All these matters will need to be the subject of further consultation with the highway authorities.</p> <p>4. MA4. Comment noted. At present there is HGV traffic on two of the major roads in the village, (the B3335 and Hazeley Road) The B3335 is also designed by HCC as a designated High-Load Route and so HGV traffic on this road is an inescapable fact of life. The purpose of this policy is to try and get the existing Northfields /HEP HGV off less suitable side roads and concentrate it on the B3335.</p>

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43	Christopher Pope (cont)	<p>5. MA6. Not sure why Church Lane is not included in this list, and White Lane, indeed the latter requires special mention to ensure it's protection, restoration and indeed 'enhancement'.</p> <p>6. PO1. Insufficiently strong. Air pollution from vehicles is a dreadful scourge and something that will give us long-lasting problems and cost, not to mention human suffering. This policy informs us that increased traffic levels will cause pollution to get worse and that TPC has nothing particular to say or do about it. We need to register our discontent and come up with some strategies to influence this (Could TPC require that all heavy goods vehicles are preceded by a pedestrian officer carrying a red flag to warn of the danger?).</p> <p>7. Aspirational Policies Perhaps some of the things that concern me could only be 'aspirational policies'. Perhaps these are worth highlighting/summarizing in one place in the document so that other authorities can be left in no doubt about what is needed to achieve TPC's Vision and Objectives</p>	<p>5. MA6; Church Lane was incorrectly labelled as Church street. Amended in the TNP. White Lane is a By-Way.</p> <p>6. TPC and WCC have both been monitoring pollution levels from the B3335 (High Street and Searles Hill). While significant, it does not exceed current triggers for control measures. It remains a continuing action of both Councils.</p> <p>7. TNP has set out a number of policies which depend on the actions of other authorities, and has set out where these are currently aspirational. Clearly the Community and TPC have many ambitions, which they can try and achieve independently of TNP. It will be for TPC and others to try to put the TNP's aspirations into action.</p>
44	Jeremy Thoday	<p>1. School road shown as footpath</p> <p>2. Orchard Close page 24, map 5 too large to the north</p>	<p>1. Yes, the base maps for Maps 1, 9 and 11 which were provided by SDNP have a minor error, but this is not material to the TNP policies and a correction to this is not proposed at this stage.</p> <p>2. Agreed Orchard Close map is incorrect. Amend TNP.</p>
45	Dr Veronica Cloke Browne	<p>Policies HN3, WE1, HN6, BE3, LHEs, MA2, MA5, SS2.</p> <p>1. HN3. Site 26. There are significant traffic issues currently with congestion and parking on Hazeley road from traffic lights down past the Doctors' surgery. 20 dwellings has potential for additional 20-40 cars regularly increase traffic flow on this busy stretch.</p>	<p>1. The congestion problems are caused by the extent of parking along the western end of Hazeley Road which has the effect of reducing the effective width of the road to one lane along a significant length. Providing an additional 20 parking spaces in the surgery car park will enable parking along the road to be significantly reduced thus easing congestion. This parking is not intended for the 20 new dwellings on Site 26 for which there will need to be some visitor parking provided plus two parking spaces for each house.</p>

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45	Dr Veronica Close Browne (cont)	<p>2. WE1. The sewers in this area already give problems in periods of heavy rainfall. As stated the bottom of the field currently floods, as does the Parish Hall car park and risk to the Gilbert Room which has also flooded. Building over the field will significantly increase run off to this area and Hazeley Road, additionally increasing flood risk to lowland houses. Positioning of additional housing at the north end of the village would reduce these risks. Run off from proposed development of site 26 will end up in Flood Zone 3.</p> <p>3. HN6. This recognises impact of traffic on village lanes and Bourne Lane would be considerably more congested with additional nearby houses.</p>	<p>2. Building on Site 26 is unlikely to increase flood risk to any significant degree. Run off design for development, has to cater for intense rainfall over short periods for which there are standard design requirements set by the Environment Agency and which allow for climate change. Flooding of Hazeley road and the car park occurs from winterbourne springs which rise only after long periods of rainfall, and is independent of the short periods of intense rainfall for which development is required to design. Flooding as a result of the winterbourne springs rising occurs at rare intervals, perhaps once in every 12 to 20 years, and continues for up to a month often in periods of low rainfall. The likelihood of the short period of intense rainfall, for which development has to design, coinciding with the same four week period of a 12 year flood event is beyond the normal calculation of flood risk and involves small volumes compared to winterbourne flood flows. As the Hazeley road drains, downstream of Site 26, are sized for the winterbourne flood event, they should provide more than adequate capacity for the short periods of intense rainfall which may run off this small housing site in a flash flood. In addition, as a normal part of the planning application, a flood risk assessment will be required and, if considered necessary, the developer will be required to construct independent storage/attenuation measures to ensure that storm water discharge volumes from the development into the existing drainage system do not exceed the greenfield run-off. In this respect, South Downs Policy SD50 on sustainable drainage is applicable.</p> <p>3. As has always been the case, traffic issues will need to be considered in any development proposals along Bourne Lane or other village lanes.</p>

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45	Dr Veronica Cloke Browne (cont)	<p>4. HN3. Is there somewhere that specifies the new build housing should have energy systems in line with mitigating emissions W.R.T. climate change?</p> <p>5. BE3. I would estimate that there are 30 + houses in the village whose occupants have either been pupils, or are pupils at Twyford Prep: The descriptor ‘few’ is misleading. In addition I have seen families moving to the area with children at the Prep looking to purchase or rent properties. The restriction on foul sewerage is confusing – presumably this would not be substantial – yet no restriction has been outlined for the proposed 20 new build properties. Again ‘consents limited to the upper part of the site’ for new buildings is not consistent with 20 new build houses in the adjacent field.</p> <p>6. LHE. Has an air quality survey at the bus stop where school children wait during busy periods ever been carried out?</p>	<p>4. TPC takes its lead on this from SDNPA; its Local Plan policy SD 48 requires all new development to achieve minimum standards of energy efficiencies, and other sustainable design features. The TNP policies are SS1 & 2 which have been redrafted.</p> <p>5. The school is a large employer and has 400 children, most of whom, employees and children, do not live in the village. They access and leave the property during prime commuting times. The PC supports the school developing, subject to it establishing a mitigation scheme to prevent all vehicle movement being further exacerbated. We note that TS have made the same point about the TNP and imposing excessive restrictions. We have responded at some length to reassure the school and explain the positive aspects of BE3 and the scope it gives to the school’s master plan. However, the constraints on future planning of the school are derived from multiple policies of the South Downs Local Plan; e.g. Historic Environment, Landscape, Traffic, etc. The site is highly sensitive for all these reasons and the level of activity of a 400 pupil school is intense and affects the village in a variety of ways, some positive, some negative. The reconciling of the multiple objections will we hope be achieved by the school’s master plan; to inform this plan, the objectives of the Community and the Planning Authority need to be clearly stated. Clarity should not be misinterpreted as hostility. Note that DB1 includes a requirement on Foul Sewerage.</p> <p>6. TPC has been raising awareness of pollution levels along the B3335. Pollution is clearly identified as a factor to be taken into account under PO policy. WCC has an emissions testing tube at the top of Queen Street on a pole. It provides a monthly average which has measured within the satisfactory section –</p>

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		<p>7. MA2.Is there any scope to use some of the field opposite Ballard Close for car parking? Very useful for Twyford St. Mary's parents.</p> <p>8. Is there a risk that the large car park will allow people to park there and use Shawford Station?</p> <p>9. MA5. Could cars be encouraged to turn off their engines at the traffic lights, as is becoming common in other towns/villages?</p> <p>10. SS2. I fail to see how 20 new homes on site 26 will not exacerbate the flooding risk on Hazeley Road.</p> <p>11. Will there also be restrictions on the development for brightness of security lights? Separate question.</p> <p>12. Stress the importance of repair and maintenance of pipe running under Hazeley Road and the storm ditches also as flood defence.</p>	<p>just. The PC wished to undertake more measuring points along B3335 in the village but to meet WCC regulation standards it would be both too difficult and expensive for the PC to fund and provide no better data.</p> <p>7. This field is in two separate ownerships both private, and both valued for their current use. One owner has asked for the view over the fields to be identified as one of special value. Its development for car parking would be contrary to SD landscape objectives. TNP has considered parking and focussed on provision for the public in the village centre, not an increase in private parking for which there is no answer which reconciles the competing objectives. A car park here could be attractive to those using Shawford Station, more so than adjacent to the Surgery. However, HCC is proposing a new car park at Shawford Station.</p> <p>8. The advance of technology will hopefully bring automated vehicles with this facility as some do already.</p> <p>9. See response to (2) above</p> <p>10. TPC and WCC have both been monitoring pollution levels from the B3335 (High Street and Searles Hill). While significant, it does not exceed current triggers for control measures. It remains a continuing action of both Councils.</p> <p>11. TPC have been pro-active on this issue for many years and will continue to be so.</p>
46	Neil Massie, Principal Planning Policy Officer, Hampshire County Council	<p>Other than this the County Council does not have comments to make on this version of the plan.</p> <p>I can confirm that the only comment from the County Council in its capacity as Education Authority is that on page 39 the document says there are 6 year groups in the primary school, but there are 7. It covers years R-6.</p>	<p>HCC position noted and welcomed.</p> <p>TNP amended.</p>

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46	Neil Massie, Principal Planning Policy Officer, Hampshire County Council	However, if you need to discuss anything in the draft plan with the Highway Authority then I would recommend speaking to Andy Shaw. Andy.Shaw@hants.gov.uk	
47	Hannah Blackmore, Business Officer London & SE, Historic England.	<p>Visions and objectives, Policies HN3, LHE2 & 3, MA6, DB1</p> <p>Historic England's remit is to provide advice on planning for the historic environment including the conservation of heritage assets and championing of good design. As such we have restricted our comments to those areas of the plan where we feel our interests would be affected.</p> <p>Visions and objectives</p> <p>1. We welcome the references to the 'special village character and landscape' within the vision for the Parish, however we would encourage a more specific reference to heritage assets being conserved, enhanced, better understood and appreciated. This could be carried over into the objectives where you might consider including an additional more directly worded objective such as <i>"To sustain and enhance the character and appearance of the Conservation Area and the significance of the heritage assets of Twyford Parish and their settings"</i>, "significance" in this case being the term used for what is important or valued about a listed building or scheduled monument (the National Planning Policy Framework defines "significance" as <i>"The value of a heritage asset to this and future generations because of its heritage interest"</i>). Additionally you could also consider amending the wording of Objective 5 to the following: 'To improve the quality of the built environment by conserving and enhancing existing heritage assets and their setting, protecting existing special qualities, and promoting high quality design and layout in new developments that make positive contributions to local character and distinctiveness.'</p>	<p>1. Agree: Added as new 7. Keep all others. NB Focus of this is all Heritage Assets; especially CA.</p> <p>Objective 5: Agree and amended.</p>

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>Policy HN3</p> <p>2. We note that the Sustainability Appraisal contains what we consider to be a robust assessment of potential site allocations. This included identification of Site 26 as the preferred option with consideration and assessment of the potential impact on heritage, particularly the Conservation Area and open views of the site and how that might be mitigated. This does not however appear to have translated fully into the Purposes and Policies of the plan that address site selection. Policy HN3 references the assessment of Site 26 and mentions that it is ‘constrained by its prominence in the landscape’ but does not go into any further detail of the heritage assets and locally significant views that might be impacted upon by any development of Site 26. This will need to be addressed directly for the plan to meet the basic condition of conformity with the local plan and national planning policy; we recommend that the assessment of impact on heritage assets is described quite clearly, including discussion of how exactly they would be affected (either directly or indirectly) and how choices for or against allocation, or the inclusion of requirements to secure protection of assets or to avoid or minimise harm have been taken into account. This needs to make clear that ‘great weight’ has been given to the need to conserve designated heritage assets in particular, including the positive contribution to their significance made by their settings. Unfortunately, failing to clearly demonstrate how this consideration has been adequately given is a point of failure for some neighbourhood plans. To support you in doing this we thoroughly recommend reading our advice notes on sites allocation affecting heritage in local plans (which is also relevant to neighbourhood planning) and our advice on considering the impact of proposals on the settings of heritage assets, both of which can be downloaded at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>2. The heritage assets are:</p> <ol style="list-style-type: none"> 1. Boundary of CA which includes part of a field for no apparent reason. The CA is currently being revised. 2. School House of Twyford School which is a listed building and remote from the DB1 site. <p>The SA looked at the evidence for this site with great care and consulted SDNPA specialists on both landscape and heritage. The prominence in the landscape has been exhaustively described and analysed, resulting in both site reduction and mitigation.</p>

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>Policy LHE2</p> <p>3. We are pleased to see the inclusion of this policy which identifies locally significant views that contribute to the character and distinctive feel of Twyford Parish, and note that a number of these views relate to the conservation area and heritage assets within the parish. We would encourage you to consider providing a little more information on these views in particular and specifically identifying why and how these views contribute to the significance of these heritage assets as well as allowing appreciation of heritage assets and the wider historic environment. Providing an illustrative photograph of each annotated to identify the key features that are desirable to conserve would help to implement this policy.</p> <p>Policy LHE3</p> <p>4. We welcome a policy that directly addresses the historic environment, buildings, conservation areas and archaeology, however both the purpose and the policy itself are rather generic and unfocussed and lacking in direction and detail and seem to bear little resemblance to each other. In its current form the wording of the policy is a little misleading and requires some amendment; it refers to the maps that show the areas of archaeological potential and the Conservation Areas, and then states that the policy for 'these areas' will be as for SDLP policies SD 12, 13, 14, 15 and 16. This wording would suggest that only these areas are covered by the policy rather than <i>all</i> the heritage assets and the historic environment within Twyford Parish and this requires clarification.</p> <p>LHE3 We would also suggest that the 'purpose of the policy' should be expanded in order to provide a robust evidence base to inform the policy itself. This could include a more detailed and thorough description of the character and heritage in Twyford Parish in order to underpin the policies of the plan. We recommend you include a</p>	<p>3. Support welcomed. Comments noted. Prepare schedule of views with short descriptions and significance for Evidence Base.</p> <p>4. Unfortunately HE did not have access to the TNP evidence base at the time of the consultation although this has now been supplied. TNP's evidence base included a very full statement of the historic and archaeological potential to underpin LHE ... Areas of archaeological potential. HE's comments clearly encourage TNP to extend its considerations of its historic heritage to cover "non listed assets". This is welcomed and clearly wholly in line with the purposes of the National Park. The long and documented existence of Twyford has left multiple assets that are not statutorily protected. However, the formal identification of non listed assets will take considerable time and effort. The identification of historic landscape is however a task under pinned by the existing study of archaeological potential. Amend policy's text to refer to historic landscape and non listed assets, with appropriate wording. Prepare schedule of historic landscape areas with supporting evidence. Amend map: Add historic landscape and Twyford Park with Hare Lane.</p>

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>more thorough overview of the historical development of Twyford as a settlement, and we would also welcome a more detailed breakdown of the 71 listed buildings in the parish (six GII* and sixty-five GII) and the Scheduled Monuments as individual heritage assets; particularly those in and around the Built Up Areas and allocated sites that may be affected by development in the future.</p> <p>In addition to the designated assets within the parish, you might also consider including a section here that addresses the non-designated assets in the neighbourhood area. National Planning Practice Guidance states “... <i>where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions</i>”.</p> <p>The National Planning Practice Guidance notes that “<i>The local Historic environment record and any local list will be important sources of information on non-designated heritage assets</i>”.</p> <p>Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, buildings of local interest, or identified historic landscapes. Your plan could, for instance, include a list of locally important neighbourhood heritage assets,</p>	

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>(e.g. historic buildings, sites, or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</p> <p>We note the reference to unidentified and undesignated archaeology and the identification of five areas of ‘archaeological potential’ however there is no explanation or justification in the plan as to how these sites were identified and/or assessed. If these sites have been identified by the Local Plan then you do not need to include this, however if these have been identified by the Parish then you will need to provide a thorough explanation of the assessment and selection process and justify their significance, which we would be happy to assist with if needed. We would also recommend that you use this policy to set out what approach there will be for these areas to enhance and promote new development and protect any remains in- situ.</p> <p>We would also draw your attention to the fact that Twyford Conservation Area is currently on the Heritage At Risk register. You could consider addressing this directly within the plan, for example by making it the focus of a specific policy aimed at facilitating its conservation, enhancement and regeneration to address the issues identified as contributing to this status.</p> <p>For further advice on the Historic Environment in the Neighbourhood Plan area and translating your evidence base into</p>	

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>policy we refer you to our HE Advice Note 11: Neighbourhood Planning and the Historic Environment: https://historicengland.org.uk/imagesbooks/publications/neighbourhood-planning-and-the-historic-environment/</p> <p>Policy MA6.</p> <p>5. We support the inclusion of Policy MA6 which is a commendable recognition of local character detail, however it needs to be laid out with a clear distinction between the ‘Purpose of the Policy’ and the policy itself in line with the rest of the plan. The policy also identifies a number of historic rural roads but does not explain how and why these have been selected, and neither does it provide any further detail on the historic character of the roads in question. We would encourage you to strengthen this policy by including an explanation of the assessment and selection process, a description of the special characteristics of the roads identified and mapping to show the location of the roads within the Parish.</p> <p>Policy DB1</p> <p>6. The allocated site will need to be checked on the Heritage Environment Record to achieve conformity with national planning policy as set out in the NPPF; please refer to the National Planning Practice Guidance for further information. The Hampshire Historic Environment Record is the main repository of data on the previously identified areas of archaeological remains in Twyford and should be noted as a source of data in the baseline, and we also recommend that you consult the Winchester Historic Environment Record as a secondary source. If you have not already done so, we would recommend that you speak to the staff at Hampshire County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets</p>	<p>Support welcomed. Agree modification to supporting text. Prepare schedule of roads identified for Evidence Base to include SDLP criteria and additional evidence.</p> <p>DB1 Heritage assets of the site have been checked. Consultations carried out with South Downs Historic Buildings Officer and Archaeology.</p>

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47	Hannah Blackmore, Business Officer London & SE, Historic England. (cont)	<p>but also locally-important buildings, archaeological remains and landscapes, and make you aware of any past issues where heritage concerns have affected decisions.</p> <p>Specific recommendation relating to: DB1 a)</p> <p>7. This policy relates to a tree clump that was also highlighted in Policy LHE3; if this has been identified as a historic feature then we would like to see some recognition of its significance and justification for its retention. We would recommend including an additional proposal within the policy that will provide a management plan for the retention and maintenance of the tree clump and any others on site. You could also consider addressing issues such as green spaces and boundary hedgerows specifically within the policy or expand DB1 e) to provide a more detailed explanation for what the 'comprehensive management scheme' will cover and that it will seek to address these issues.</p>	<p>7. The clump does not appear to be a historic feature. The justification for its retention is the size and landscape significance of the trees, which are now subject to TPO. The managed plan for the clump will be achieved at planning application stage. There is only one boundary hedge row which is of very low landscape or ecological value.</p> <p>No change to policy DB1.</p>