

LPA Response to the Submission (Regulation 16) Titchfield Neighbourhood Plan

Part 1 – Summary of Local Planning Authority response to the Submission (Regulation 16) Titchfield Neighbourhood Plan

- 1.1 The Local Planning Authority (LPA) recognises the efforts that have been made by the Titchfield Neighbourhood Forum (NF) in preparing and reaching the Submission stage of the Titchfield Neighbourhood Plan process. The LPA response is based on the submission documents provided by the Titchfield NF and include the Submission TNP, Consultation Statement and Basic Conditions Statement.
- 1.2 Officers note that many of the comments made by the LPA on the TNP during the Pre-submission (Regulation 14) consultation have not been met or partially met through amendments made in the Submission version of the TNP.
- 1.3 The LPA comments have been provided to assist the Independent Examiner in the Examination of the TNP. To that end, the LPA has a number of key concerns and has offered suggested amendments where possible when the Neighbourhood Plan falls short of the 'basic conditions'. The areas where the LPA considers the Submission Titchfield Neighbourhood Plan falls short are:
 - i. Not having regard to national policies and advice (particularly the requirements of the PPG).
 - ii. Not ensuring the Titchfield Neighbourhood Plan is in general conformity with the Adopted Local Plan (ALP), i.e. the Development Plan which includes Development Plan (Local Plan Part 1: Core Strategy and Local Plan Part 2: Development Sites and Policies), and the potential to undermine the strategic policies in the Development Plan.
- 1.4 Please note, in addition to the above (under category i), it is important to highlight that the Pre-submission Titchfield Neighbourhood Plan does not provide:
 - Sufficient clarity to allow a decision maker to apply them consistently and with confidence when determining planning applications in the neighbourhood plan area.
 - Sufficient flexibility to ensure they plan positively to support local development.
 - Set out the justification and evidence to clearly support policy requirements.
- 1.5 In addition, the Local Planning Authority is concerned that some policy requirements have the potential to have a negative impact on viability and therefore, the deliverability of housing.
- 1.6 The LPA's concerns are discussed in more detail in Part 2 of this response below. Comments on policies in Part 2 of this response have been shaded in grey.

Part 2 – Local Planning Authority (LPA) comments on the Pre-Submission (Regulation 14) Titchfield Neighbourhood Plan (TNP) that have been partially overcome or not overcome in the Submission (Regulation 16) TNP

This section includes the LPA’s comments on the Pre-Submission (Regulation 14) Neighbourhood Plan that have not been addressed either fully or in part, in the Submission (Regulation 16) Neighbourhood Plan. The first three columns are duplicated from the response submitted by the LPA in September 2018. The right-hand column is new and aims to clarify the extent to which previous comments have been met.

Where the LPA comments on the Pre-submission TNP have been overcome (i.e. through amendments) these have not been included in the table below.

For the Examiner’s ease of reference comments on policies have been highlighted in grey throughout the document.

Policy/ Section in the Pre-Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre-Submission?
Contents page (pages 1 and 2)	The contents page (pages 1 and 2) refers to Policy 5 - Smaller Dwellings, Policy H.6 Brownfield Sites and Policy T.2.1 - Pedestrian and Cycling Routes. However, these policies are absent from the TNP.	Advise deleting references to Policy 5, Policy H.6 and Policy T.2.1.	Partially Met – The contents page refers to Policy H5 (Community Infrastructure), which is absent from the TNP.
Contents page (page 3)	Appendices 16, 17 and 26 are missing from the contents page. These should be removed if they are no longer relevant.	Advise renumbering the appendices.	Not met – Appendices 16, 17, 25 and 30 are labelled as not in use on the contents page. These should be removed, and the Appendices renumbered to avoid confusion.
1.1 – The Neighbourhood Plan (page 7)	The second paragraph of this section makes the following statement: “This document sets out the aspirations of the community”. The Forum should note that any aspirations related to non-land use	Advise either deleting the sentence or provide further explanation which clearly relates to the	Partially Met – The text on page 9 of the TNP still refers to community aspirations being noted

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	<p>matters should be set out in a companion document or annex as stated in the National Planning Practice Guidance (PPG).</p> <p>The final sentence of this section ‘The health and well-being if the residents in reflected throughout...’ is not clear or well related to this section of the plan. There are no further points in the plan where health is mentioned.</p>	<p>objectives/policies within the TNP.</p>	<p>and clearly marked in boxes throughout the TNP.</p> <p>It is advised that any aspirations related to non-land use matters should be set out in a companion document or annex to the TNP as stated in the PPG.</p>
<p>1.2 – Housing (page 7)</p>	<p>The second sentence refers to ‘History (FBC Emerging Local Plan 2018 – 2036, p.32 policy H1 Strategic Housing Provisions) shows us that approximately 10% of the housing demand will be met by windfall sites (see Glossary p59) within the Borough’. At this juncture, it is not clear how the housing demand will be met from windfall sites. The plan should provide further justification and evidence for the approach taken.</p>	<p>Advise deleting the reference to ‘History’.</p> <p>Advise providing further analysis on the windfall rates in Titchfield to provide a more accurate basis on which to rely upon.</p>	<p>Partially met –</p> <p>It is noted that the Forum have provided further information in the TNP as to how the future housing demand for the Designated Neighbourhood Area will be met. However, it is advised that the Forum provide further justification and robust evidence to support this claim.</p>
<p>1.3 Getting Around (page 7)</p>	<p>This section refers to traffic policies and tasks, however, there is no reference to the relevant policies and tasks. It is advised that reference to the policies and tasks in Chapter 10 are included in this section.</p>	<p>Advise adding reference to policies and tasks in Chapter 10.</p>	<p>Not met –</p> <p>The reference to the traffic policies and tasks has not been included as previously advised.</p>
<p>1.4 – Commercial and Economic Considerations (page 7)</p>	<p>Reference is made to ‘Proposals to convert business or commercial premises into residential use will be resisted’. This text sounds like policy wording and is contrary to the GDPO 2015.</p> <p>In addition, there is no further clarification in relation to this sentence throughout the plan and</p>	<p>Advise deleting sentence.</p>	<p>Not met –</p> <p>It is advised that the sentence is deleted to avoid a lack of conformity with national legislation on permitted development rights.</p>

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	it is recommended that this sentence is removed from the TNP.		
1.6 Historic Titchfield (page 7)	<p>The last paragraph of page 7 in italics does not sit well within this section. In addition, the last sentence of this paragraph is unclear.</p> <p>Suggest moving the last paragraph to section 4.1 of the plan and providing further clarification in respect of the last sentence of the paragraph.</p>	Advise moving the sentence to section 4.1 of the plan.	<p>Not met –</p> <p>The paragraph has moved further up the page under section 1.1. (page 9). The TNP now provides a source for the quote in italics. However, further clarification has not been provided in relation to this paragraph as previously advised.</p>
Chapter 3 – Titchfield Today (page 11)	English Heritage is now known as ‘Historic England’.	Advise reference to English Heritage is changed to Historic England.	<p>Not met –</p> <p>It is advised that the reference to English Heritage is amended for accuracy.</p>
Chapter 4 – How the Neighbourhood Plan Developed (Chapter 13)	It is advised that the information set out in Chapter 4 may be better placed in a background document to the TNP.	Advise placing the information in Chapter 4 in a separate background document.	Not met.
5.2 Urban Area Boundary (page 16)	The first paragraph of the section makes the following statement “The NP Policy H.3 recommends extending the existing Urban Area Boundary for Titchfield to include properties along Southampton Hill”. First, the reference to Policy H.3 is incorrect and should be amended to ‘Policy UAB.1. Urban Area Boundary’. Also, the TNP refers to ‘recommends extending the existing Urban Area Boundary’. However, this includes Policy UAB.1 in the plan, which extends the	Advise addressing points raised.	<p>Partially met –</p> <p>Map 2 (page 18) in the TNP revises the proposed extension to the Defined Urban Settlement Boundary by omitting the land to the south of properties 5-21 Southampton Hill.</p> <p>However, the additional points raised by the LPA during the Pre-submission (Regulation 14) consultation have not</p>

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	<p>Settlement Boundary, rather than <i>recommending</i> that it is extended.</p> <p>Furthermore, the proposal for extending the Settlement Boundary is not in general conformity with the strategic policies of the Adopted Local Plan and does not have regard to the NPPF. First, in relation to the 2012 NPPF, the definition of previously developed land excludes 'land in built up areas such as residential gardens'. Therefore, the extension of the boundary would be treated as 'greenfield' as effectively it would be included within the Settlement Boundary ('built up area') for Titchfield and therefore contradicts the purpose of including this land for 'small scale development'. In addition, the proposed extension to the Settlement Boundary includes land to the south of properties 5-21 Southampton Hill. This land is not part of the curtilage of any of the properties on Southampton Hill and including this land as part of the Settlement Boundary is effectively allocating a site for housing. The proposed extension in this case would allow for further housing within the Settlement Boundary for Titchfield. Therefore, housing development on this site would not be considered 'windfall' as it would allow housing to come forward on this site. The Council is unclear what the Neighbourhood Forum's intention is within the Pre-submission Plan as it lacks clarity. If it is the Forum's intention to allocate a site by amending the DUSB, then additional evidence should be provided to explain</p>		<p>been addressed, and further clarification and evidence is still required from the Forum to justify the extension to the Settlement Boundary for Titchfield.</p>

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	<p>the rationale for including this site within the TNP. It would also not be in conformity with the ALP. Please also note that if the Forum submit the TNP under the 2018 NPPF (paragraph 122) there has been a change of emphasis in respect to garden land.</p>		
5.3 Strategic Gap (page 17)	<p>The first paragraph of this section makes the following statement 'In effect the gap represents a green jacket around the village'. This statement is unclear and confusing as to its meaning and implications.</p> <p>It is advised that further clarification is provided on policy CS22 in the Adopted Local Plan in relation to the Strategic Gap.</p>	Advise providing further clarification in relation to references made on the Strategic Gap.	<p>Partially Met –</p> <p>The statement referring to the gap as a 'green jacket' has been removed from the TNP.</p> <p>However, further clarification has not been provided in relation to Policy CS22 of the ALP as previously advised.</p>
7.1 Strategic Environmental Assessment (SEA) (page 19)	Reference is made to SEA in the first and second paragraph. Although this is useful information it is not understood how this relates to the plan in respect of the basic conditions. In addition, reference is made to the Forum having 'received the SEA' is incorrect. The Forum received a Screening Report and Appropriate Assessment, and a Screening Decision from the Council.	<p>Advise that the section on SEA could be moved to the Basic Conditions Statement and explained more fully.</p> <p>In addition, the LPA advise that the statement in relation to receiving the SEA should be amended to 'The Council provided the Forum with a copy of the Screening Report and Appropriate Assessment, and a Screening Decision Notice'.</p>	<p>Partially Met –</p> <p>It is welcomed that the Forum have amended the reference to 'receiving the SEA' to the advised wording provided by the LPA.</p> <p>However, it is still advised that the information on SEA and Appropriate Assessment is moved to the Basic Conditions Statement and explained more fully.</p>
7.2 The Titchfield	The first paragraph combines three separate quotes from the NPPF and a Resolution from the	Advise separating quotes so they are easier to read.	Partially Met –

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neighbourhood Plan, the National Plans and the FBC Plan (page 20)	<p>United Nations Assembly. Advise that these quotes are separated so they can be read more easily.</p> <p>In addition, the quotes from Paragraph 14 of the NPPF (text box on page 4 of the NPPF) are incorrect and should be amended. Furthermore, the quote from Paragraph 9 should refer to both Paragraph 9 and 10 of the NPPF.</p>	Advise amending the quotes to accurately reflect the NPPF.	<p>It is noted that the quotes from the NPPF and a Resolution from the UN Assembly have been separated and now read more clearly.</p> <p>However, the quote from paragraph 14 of the NPPF is still incorrect. Also, it is advised that the quote from Paragraph 9 of the NPPF should also refer to Paragraph 10 of the NPPF.</p>
Table.1. (pages 20 and 21)	<p>There are several policies within the table where either the policy reference is not consistent with the reference of the policy in the main body of the plan or the policy does not appear to be present in the TNP. Policy references should be reviewed and revised.</p> <p>In addition, the Forum have made reference to chapters within the NPPF as indicators for achieving sustainable development but has not included chapters 3,5 or 13. An explanation of why these chapters have not been included should be provided. Furthermore, there are specific sections on plan-making and decision-taking, which makes specific reference to neighbourhood plans. Again, these should be referred to.</p>	<p>Advise amending the table so policy references in the plan are consistent.</p> <p>Advise that all policies in the TNP are cross referenced in the table.</p>	<p>Partially Met –</p> <p>There are still 2 policies that are not in the table but are included in the TNP – Policies HT1 and HT2. The table should be amended to be inclusive of all policies in the plan.</p> <p>Reference to Chapters 3, 5 or 13 are not included in the Submission TNP. It is advised that an explanation of why these chapters have not been included should be provided. Furthermore, there are specific sections on plan-making and decision-taking, which makes specific reference to neighbourhood plans. Again, these should be referred to.</p>
7.4 Support for FBC Local Plan (page 22)	The LPA advise that further clarification and explanation should either be provided in this section in relation to how the TNP is in general	Advise providing further clarification and explanation.	Not met.

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	conformity with the strategic policies of the Adopted Local Plan, or in the Basic Conditions Statement which should then be linked to the TNP.		
Table.2. (pages 22 and 23)	<p>There are several policies within the table where either the policy reference is not consistent with the reference of the policy in the main body of the plan or the policy does not appear to be present in the TNP. Policy references should be reviewed and revised.</p> <p>In addition, the table only refers to 5 policies in the Local Plan Part 1: Core Strategy (LP1). There appears to be no reference to any of the other strategic policies in the LP1 or any of the policies in the Local Plan Part 2: Development Sites and Policies (LP2).</p>	<p>Advise amending the table so policy references in the plan are consistent.</p> <p>In addition, the LPA advise that the plan should cross refer to strategic policies in the LP1 and LP2 where relevant. The Basic Conditions statement should include a more detailed assessment of how the plan is in general conformity with the strategic policies of the Adopted Local Plan (LP1 and LP2).</p>	<p>Partially Met –</p> <p>There are still 2 policies that are not in the table but are included in the TNP – Policies HT1 and HT2. The table should be amended to be inclusive of all policies in the plan.</p> <p>It is advised that policy titles should be provided for all policy references in the table.</p> <p>In addition, as previously advised the TNP should cross refer to strategic policies in the LP1 and LP2 where relevant. The Basic Conditions statement should include a more detailed assessment of how the plan is in general conformity with the strategic policies of the Adopted Local Plan (LP1 and LP2).</p>
Chapter 8 – The Structure of the Plan (page 25)	The last box on the page refers to aspirational tasks. It is noted that the TNP refers to the tasks as mainly aspirations identified by the Forum that relate to non-land use matter. However, the LPA advise that these tasks should be moved to a separate annex or companion document to the TNP.	Advise moving all tasks to a separate annex or companion document to the TNP.	<p>Not met –</p> <p>It is advised that any tasks related to community aspirations is moved to a separate annex or companion document to the TNP.</p>

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9.1. Background and rationale (page 27)	<p>Whilst not a policy, the first paragraph of this section does not provide any clarity for potential planning applications in the Titchfield Neighbourhood Plan area. It is advised that further clarification is provided by making specific references to the NPPF and the ALP.</p> <p>The second paragraph refers to the historic environment in relation to Titchfield. This paragraph should be moved to Chapter 13 of the TNP.</p> <p>The fourth paragraph of this section repeats the penultimate paragraph in Chapter 3 – Titchfield Today (page 11). Suggest removing the text from Chapter 3. In addition, the Forum could include a link to Appendix 31 in this paragraph.</p> <p>Map 5 seems to be a copy of Map 6 on page 26 and could therefore be removed from the plan.</p>	Advise amending TNP.	<p>Partially met.</p> <p>The first paragraph has been deleted rather than providing further clarification in the TNP.</p> <p>The second paragraph has been moved to Chapter 13 of the TNP.</p> <p>It is advised that the paragraph referring to house prices should be removed from Chapter 3 as previously advised.</p> <p>It is noted that Map 6 has been deleted from the TNP.</p>
9.2 Meeting future housing needs in Titchfield (page 27)	Update second paragraph to reflect the changes to national policy. I would refer you in particular to the transitional arrangements in the NPPF published on 24 th July 2018. These arrangements are found in Paragraph 214 of the NPPF.	Advise updating second paragraph.	Not met.
Section 9.3 How many additional houses are need in Titchfield? - Section 9.6	<p>Section 9.3 – 9.6 provides details on the Housing Needs Assessment completed by AECOM for the TNP. Reference is made to Paragraph 20 of the AECOM report which states that,</p> <p>“in arriving at a final housing figure, we do not judge there is any justification to make an uplift to</p>	The LPA advise that the Pre-submission plan should provide further justification in Sections 9.3-9.6 as to how windfall development will meet the housing requirement set out for the	<p>Partially Met –</p> <p>It is noted that the TNF have extended the TNP period to include completions from 2011 – 2018. The completions have been used in the Forum’s assessment for</p>

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<p>Where will the new houses be built (pages 28 - 30)</p>	<p>the figure beyond 262 dwellings for the Neighbourhood Plan period”.</p> <p>Following this statement there are a number of assumptions that are made in these sections as to how the housing requirement figure can be fulfilled. However, there is no reference to how this will be met until section 9.6 (page 30).</p> <p>Reference is made to a number of housing completions being counted towards the housing figure being identified for the Titchfield Neighbourhood Area in the AECOM report. However, the Titchfield Neighbourhood Plan covers the period 2018 – 2036. Therefore, any housing completions before 2018 cannot be counted towards meeting the requirement up to 2036. Further analysis should be included in an Appendix linked to this section to demonstrate that 10 dwellings would come forward through windfall development in the Titchfield Neighbourhood Plan area.</p> <p>In addition, the grey box on page 28 sets out the requirement for plan period, i.e. to 2036, not to 2034. The Forum should include an additional two years requirement to cover the TNP period.</p> <p>Furthermore, the LPA is concerned in respect of the reference to reviewing the TNP after 5 years. If, the Forum relies on this evidence from the AECOM Housing Needs Assessment, then it</p>	<p>Titchfield Neighbourhood Plan area. This information should be supported by evidence.</p> <p>In addition, the LPA advise that the Forum should review the permissions referred to in terms of constituting part of the neighbourhood plan area housing figure over the plan period.</p>	<p>the justification to include windfall development in the TNP.</p> <p>However, the justification for including windfall in the TNP should be supported by robust evidence. The LPA remains concerned that this information has not been provided.</p> <p>Further information has been provided by the Forum in relation to the types of dwellings in Titchfield in comparison with Fareham in section 9.4 of the TNP.</p>

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	<p>would need to be clear how the Pre-submission Plan meets housing need up until 2036.</p> <p>The LPA advise that these paragraphs are amended to provide an improved relation with Policies H.1 – H.3 to provide clarity as to what these policies are trying to achieve, and to provide justification and the rationale for including the policies in the TNP.</p>		
9.4 Types of dwellings in Titchfield (page 29)	<p>This section refers to 2011 census data in relation to the types of dwellings in the Titchfield Neighbourhood Plan area and make comparison to the rest of the Borough and national levels. However, there is no data provided in the TNP to illustrate this comparison.</p> <p>In addition, there is no information provided in this section to demonstrate that these properties are either rented or owner occupied. Further clarification should be provided in this respect.</p>	<p>Advise providing Borough and national information on types of dwellings.</p> <p>Advise providing clarification as to the split of rented/owner occupied housing.</p>	<p>Partially met –</p> <p>It is welcomed that additional data has been provided on the proportion of owner occupied, affordable and private rented dwellings in Titchfield and in the Borough.</p> <p>However, it is advised that further clarification should be provided in relation to the data on the mix of dwellings in the plan area. In addition, section 9.4 signposts the reader to data on national levels but this data appears to be missing.</p>
9.5 What sort of dwellings do we need in Titchfield (page 29)	<p>Paragraph 1 of this section refers to ‘social housing’ and ‘affordable rented housing’. Social rent and affordable rent are two different terms, but are both forms of affordable housing. The 2018 NPPF provides up to date definitions of both.</p>	<p>Advise clarifying the types of affordable housing.</p>	<p>Partially met –</p> <p>It is welcomed that section 9.5 now provides a definition of affordable housing.</p>

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			However, it is advised that further clarification should be provided on the types of affordable housing referenced in the TNP.
9.6 Where will the new houses be built? (page 30)	<p>Reference is made to paragraph 5.46 of the Fareham Local Plan 2036 and the development opportunities which have been identified in Titchfield. The plan states that the quote is taken from the Draft Fareham Local Plan 2036 which is incorrect, the quote is taken from the Adopted Local Plan Part 1: Core Strategy (2011). The reference should be amended in this respect.</p> <p>Reference is made to Policy H6 - Brownfield Sites. However, Policy H6 does not appear to be in the TNP. In addition, paragraph 4 of the sections refers to a community consultation where preference was shown for brownfield rather than greenfield sites. A link to the relevant evidence base should be provided in this respect.</p> <p>In addition, the TNP should provide additional clarity in terms what appears to be a proposed extension to the Settlement Boundary. The proposed extension would allow for potential development within the boundary, which the LPA would not consider to be 'windfall' (Please see more detailed comments in relation to section 5.2 above).</p>	Advise making suggested amendments.	<p>Partially met –</p> <p>It is welcomed that the reference to Policy H6 has been deleted.</p> <p>The LPA advises amending the reference to the Fareham Local Plan 2036 in paragraph 5.46 to the Adopted Local Plan Part 1: Core Strategy (2011) for accuracy.</p> <p>In addition, it is advised that further clarification should be provided in terms of what appears as a proposed extension to the Settlement Boundary (see comments in relation to section 5.2).</p> <p>Furthermore, it is advised that the last paragraph should be amended, as it is currently unclear and confusing.</p>

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	Furthermore, the last paragraph of the section is unclear and confusing. The housing allocation (H3) referred to in this paragraph is part of the Draft Fareham Local Plan 2036, and the site is not within the ward boundary for Titchfield. The paragraph should be amended to reflect this.		
Aim (page 31)	The aim refers to 'the emerging plan 2036'. It is recommended that this is amended to 'Draft Fareham Local Plan 2036'. Also, this aim conflicts with Objective H1 and should be amended accordingly.	Advise amending aim.	Not met – It is advised that the aim is amended accordingly.
Objective H.1. (page 31)	The objective states 'New housing should be provided within the revised Urban Area Boundary'. This objective sounds like policy wording. It is recommended that the wording of the objective is reviewed and revised. In addition, the Objective refers to Policy H.3 and this is incorrect and should be Policy UAB.1.	Advise amending Objective H.1	It is noted that objectives H1 and H2 have been switched.
Objective H.2 (page 31)	This objective refers to Policies H.5 and Policies H.6 neither of these appear in the TNP and reference to these policies should therefore be removed.	Advise removing references to Policies H.5 and H.6.	Partially met – The references to Policies H.5 and H.6 have been removed from the Objective. However, the Objective now refers to Policy H.3, which refers to local housing need and does not appear to correlate with Objective H.2. Also, this objective sounds like policy wording. It is recommended that the wording of the objective is reviewed and revised.

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Objective H.4 (page 31)	<p>This objective sounds like policy wording. It is recommended that the wording of the objective is reviewed and revised.</p> <p>In addition, the objective refers to Policy H.4 this is not necessary. Consider removing the reference from the objective.</p>	<p>Advise amending Objective H.4.</p> <p>Advise deleting reference to Policy H4.</p>	<p>Objective H.3 has been deleted and the previous Objective H.4 has now been amended to Objective H.3.</p> <p>Partially met – it is advised that Objective H.4 is amended as the objective sounds like policy wording.</p>
<p>Section 5.2 (page 16) and</p> <p>Policy UAB.1. – Urban Area Boundary (page 31)</p>	<p>Policy UAB.1. reads as more of an objective/introductory text. The policy text also infers that the TNP will review the Urban Area Boundary. However, the TNP appears to be proposing an amendment to the Urban Area Boundary within the Pre-submission Plan as previously mentioned.</p> <p>The policy is contrary to the strategic policies in the ALP and the 2012 NPPF. The policy should be accompanied by proportionate evidence and supporting text that provides justification and rationale for the change to the settlement boundary for Titchfield. In particular, the Council published a Settlement Boundary Review in October 2017. Chapter 4 of the Review provides a number of factors that were used in the assessment of boundaries in the Borough. Also, the reference to ‘page’ should be deleted.</p> <p>The windfall rate that is relied upon does not ‘cap’ site sizes, whereas Policy H1 does cap sites, to 10 dwellings. Further clarification should be provided as to whether a cap applies or not. Also, further evidence should be provided by the Forum</p>	<p>The LPA advise that additional clarification to the policy should be provided in the TNP.</p> <p>Advise deleting the reference to ‘page’.</p>	<p>Not met – it is advised that additional clarification in relation to the policy context should be provided in the TNP.</p> <p>The reference to the policy has been amended to Policy DUSB.1</p> <p>It is noted that the TNP has provided a signpost to the site assessment sheets in Appendix 34. However, there is no justification to explain how the sites assessed during the plan preparation is relevant to the proposed review of the Settlement Boundary.</p> <p>In addition, the second bullet point of supporting text for Policy DUSB.1 also refers to further evidence but does not provide a link as to where this evidence is located. It is advised that further clarification is provided in this respect.</p>

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	<p>to demonstrate that this capping would not restrict windfall.</p> <p>In addition, the Forum should note that the NPPF (2012) definition of previously developed land excludes, 'land in built-up areas such as residential gardens'. This definition has been slightly amended in the 2018 NPPF.</p>		
Policy H1. – Windfall Development (page 32)	<p>The policy should be accompanied by proportionate evidence and supporting text that provides justification and rationale for the inclusion of Policy H.1 in the TNP.</p> <p>Policy H1 advocates a 'maximum' (up to 10 dwellings) dwelling number for small scale infill development. In line with the principles of the NPPF it would be beneficial if the policy was worded in a more positive manner to provide flexibility over the life of the neighbourhood plan. In addition, the term 'as far as possible' could not be applied to a planning application with precision.</p> <p>At this juncture, given the lack of proportionate evidence provided, it is unclear how this policy complies with the strategic policies of the ALP.</p>	The LPA advise that further justification and rationale should be provided for Policy H.1.	<p>Not met –</p> <p>It is advised that further justification and rationale should be provided for Policy H.1 as advised previously.</p>
Policy H.2. Affordable Housing (page 32)	<p>The spirit of this policy is noted; however, the LPA is concerned how this policy would operate in practice.</p> <p>It is suggested that the policy requirement is clarified. As it stands the requirement is unclear and as currently worded would not accord with</p>	The LPA advise addressing the issues raised.	<p>Partially met –</p> <p>The policy wording has been amended to provide further clarification.</p> <p>However, the revised policy wording is a repeat of Policy CS18 of the ALP. It is</p>

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	<p>the requirements of the PPG. The terms ‘should’ and ‘appropriate’ could not be applied to a planning application with precision.</p> <p>In addition, supporting text should be provided to explain the rationale behind the policy.</p> <p>As it currently stands, the TNP does not accord with the 2012 NPPF and detailed guidance in the PPG in relation to affordable housing requirements.</p>		<p>advised that the policy is amended to accord with the 2012 NPPF and detailed guidance in the PPG in relation to affordable housing requirements.</p>
<p>Policy H.3. Local Need (page 32)</p>	<p>It is not clear if the policy applies to market or affordable housing or both.</p> <p>The policy does not provide sufficient clarification as to the exact mix of units that are required on a new development site. The policy currently reads that all new housing should be ‘smaller dwellings’ which would impact upon development viability. The LPA is concerned that the Neighbourhood Forum has not drawn upon evidence in justifying or testing a proposed specified housing mix. It would be helpful for the Neighbourhood Forum to provide further justification and clear evidence on this policy requirement prior to the submission of the Neighbourhood Plan. Also, the term ‘should’ could not be applied to a planning application with precision.</p> <p>In addition, the consequences of this policy also need further clarification. Restricting the mix of new dwellings to those that are ‘mainly smaller’</p>	<p>The LPA advise that additional clarification to the policy should be provided in the TNP.</p>	<p>Partially Met –</p> <p>It is welcomed that the Forum have clarified that the policy applies to affordable homes.</p> <p>However, the LPA is still concerned that the Neighbourhood Forum has not drawn upon evidence in justifying or testing a proposed specific housing mix. Also, the term ‘should’ could not be applied to a planning application with precision.</p>

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	<p>dwelling could result in people being forced to move out of the Neighbourhood Plan Area. An Equalities Impact Assessment (EIA) should be completed on this policy in this respect.</p>		
<p>Policy H.4 – Quality Design and Local Character (page 32)</p>	<p>There is no evidence provided or supporting text to justify and explain the rationale of Policy H.4.</p> <p>It is suggested that the policy requirement is clarified. As it stands the requirement is unclear and as currently worded would not accord with the requirements of the NPPF and more detailed guidance in the PPG in relation to viability and design. In addition, the terms ‘respects’ and ‘creates’ could not be applied to a planning application with precision.</p> <p>Criterion c) of the policy text refers to ‘public and private areas’ and it is not clear as to what this refers to. The LPA would recommend providing further clarification in the policy text to define these terms. In addition, there are two criterion c’s and two criterion d’s and therefore, the policy criterion should be renumbered.</p> <p>In terms of the reference to ‘views and vistas’ and ‘local landmark’ in criterion d) it would be useful for the TNP to illustrate these views and vistas and local landmarks on a map.</p> <p>Further explanation is required in the policy text as to what constitutes ‘green technologies’ and</p>	<p>The LPA advise that further clarity should be provided on the policy requirements in the supporting text that justifies and explains the rationale for the policy.</p> <p>Advise providing a map on a side of A4 that illustrates the views and vistas and local landmarks indicated in criterion d) of the policy.</p> <p>Advise renumbering the policy criterion.</p> <p>Advise providing a further explanation of ‘green technologies’.</p>	<p>Partially met –</p> <p>The LPA notes that several criteria for Policy H.4 have been deleted. The LPA remain concerned that there is no evidence or supporting text to justify the rationale of Policy H4 has been provided.</p> <p>In addition, the term ‘acknowledges’ in criterion a) of the policy text could not be applied to a planning application with precision.</p>

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	<p>'local materials', and how this would not adversely impact on viability of a development.</p> <p>In addition, you may wish to consider what criterion g) adds to existing local policy prior to the submission of the neighbourhood plan.</p>		
10.3 – Background (page 33)	<p>Clarification of the history of traffic problems and what has been carried out historically to resolve them would be pertinent to assist readers in understanding what has been completed previously, preferably more recently than the 1930's A27 works or 1960's South Street chicanes.</p> <p>Reference should also be made to the significant investment and enhancement to the A27 between Segensworth Roundabout and Titchfield Gyratory (circa £15 million in the Titchfield area) with the aim of ensuring more reliable journey times on the A27 and reducing the need for motorists to seek alternative routes.</p>	<p>Advise providing further clarification and information on historical traffic problems and what has been carried out to resolve them.</p> <p>Advise adding reference to the upgrades and enhancements to the A27.</p>	<p>Partially met –</p> <p>It is welcomed that an additional sentence has been provided in the TNP to clarify the recent enhancements to the A27.</p> <p>However, it is advised that further clarification and information should be provided on historical traffic problems and what has been carried out to resolve them.</p>
10.4 – Where we are now (page 34)	<p>A summary of the issues and works undertaken recently should be included in this section, rather than just referencing Appendix 19 (link broken in the Plan document).</p> <p>There is a lack of connectivity within the plan document linking transport requirements and proposals for housing, focusing on the reasons behind the need for improvements to the transport links and how these can be facilitated through new development.</p>	<p>Advise including a summary of the traffic issues and work undertaken recently in Section 10.4.</p> <p>Advise improving the quality and size (should be A4) of the images in Appendix 19.</p> <p>Advise providing information on where</p>	<p>Partially met –</p> <p>It is welcomed that additional information has been provided in section 10.4 on the areas where there are traffic issues and the main issues considered by the Forum.</p> <p>Additional information of the traffic issues has also been provided in Appendix 19, however, the issues around the lack of</p>

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	<p>Images within Appendix 19 are too small to be of use or legible. The text refers to pinch-points, lack of adequate crossing facilities and more, which should be noted and locations identified on a larger plan. Indication of where additional facilities could be located for the purpose of further review by the Highway Authority (Hampshire County Council) should also be annotated on a Map in the plan.</p> <p>Appendix 19 also refers to traffic flows on Coach Hill undertaken by the Forum and TVT members, but make no reference to the day(s) or times at which this data was collected. It is therefore suggested that the Forum procure a traffic survey through the Highway Authority to accurately determine the traffic flows and movements through the village to enable informed decisions to be made in the future. The vehicle count data within Appendix 19 is not validated and no evidence of video recording methodology. Vehicle counts required as an appendix, to include who undertook the survey, how this was analysed, the dates and times of the survey. Results should be produced in a tabular format by date and time using 5 minute 'bins' for the count and carried out on multiple days at a neutral time of day, day of week, and month. In addition, pedestrian counts should be undertaken, to give an indication of the levels of demand. Identification of where pedestrians are currently trying to cross would be</p>	<p>additional facilities could be located for review by the Highway Authority. This information should be annotated on a Map in the plan.</p> <p>Advise liaising with the Highway Authority to procure a traffic survey to accurately determine traffic flows and movements throughout the village.</p> <p>Advise undertaking pedestrian counts to provide an indication of the levels of demand. This should be included in a separate Appendix with maps to illustrate count locations.</p>	<p>evidence of the data in terms of collection, methodologies, dates/times/durations and the results remain, and require clarification.</p>

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	useful in a pictorial format (mapped). Details should be in an appendix to the TNP.		
10.5 – Pedestrians (page 34)	<p>There is no evidence within the Plan or supporting documentation to support the claim of speeding vehicles, and traffic speed surveys should be undertaken to justify these comments.</p> <p>In reference to the narrow footpaths and crossing points, the TNP is seeking to keep the character and form of the village preserved and seeks development is appropriate and considers this. The narrow footpaths are a feature of the nature of the village. Wider footpaths, although able to cater for all pedestrians would be of detriment to the historic nature of the village and would have the impact of urbanising the area. The addition of numerous signalised or zebra crossing points would have the same effect. This should be recognised within the text of Policy GA1 (Pedestrian Safety) and wording to the effect of 'appropriate modifications and installation of footways and pedestrian crossing points shall only be considered where appropriate and in keeping with the character of the surrounding areas'. The locations of these crossings would need to be investigated in conjunction with new development.</p> <p>Furthermore, it is unclear what the relevance of the word count in relation to the HCC transport document and the word 'pedestrian' in terms of the context of the TNP.</p>	<p>Advise providing further evidence to substantiate the claim made on the image in section 10.5.</p> <p>Advise adding the following supporting text to Policy GA1 – Pedestrian Safety.</p>	<p>Partially Met -</p> <p>No further evidence has been provided to substantiate the claims of 'speeding' through the village. Data should be sought to assess the speed of vehicles throughout the village and be presented as an appendix to the Plan.</p> <p>It is welcomed that the plan recognises that it is important to maintain the character of the village, but also now reflects the needs of pedestrians too.</p> <p>The modification to Policy GA1 is noted.</p>

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10.6 - Parking	<p>With reference to the meeting with the Hampshire County Council (HCC) representative, FBC suggest the plan should avoid referring to unsubstantiated conversations with individuals. The Highway Authority must be able to comment on this statement.</p> <p>Reference is made to Fareham Borough being second in the county for car ownership, this statement should be supported by evidence through analysis of ONS data sets.</p>	<p>Advise adding date of the meeting with HCC to Section 10.6.</p> <p>Consider adding evidence to support the statement on car ownership.</p>	<p>Partially met –</p> <p>The reference to meeting with a representative of HCC has been deleted.</p> <p>However, it is advised that the statement in the first paragraph of section 10.6 should be supported by robust evidence.</p>
10.7 – Car Parks in the Plan Area (pages 35 and 36)	<p>The current parking facilities should be mapped for ease of identification and to assess their accessibility from the Village centre, and the number of spaces should be identified and totalled. This could be provided in a relevant Appendix to the TNP.</p> <p>From the information provided in the section there is a total of 242 off-street spaces within the listed car parks. In conjunction with the on-street provision in the village centre, an assessment is needed on the use of the parking facilities to determine any additional spaces needed or revision of restrictions to increase vehicle turnover, thereby allowing a greater footfall within the village.</p> <p>In addition, the fifth bullet point in this section refers to ‘a car park provided off Cartwright Drive</p>	<p>Advise mapping the current parking facilities in the village centre.</p> <p>Advise providing an assessment of the use of the parking facilities to determine any need for additional spaces.</p> <p>Advise amending the final sentence to ‘Safety concerns have been raised where reduced road widths as a result of parking within the village, may have impacts on accessibility for emergency services’.</p>	<p>Not met -</p> <p>Section 10.7 is now on page 38 of the Submission TNP.</p> <p>The LPA advise providing further clarification as advised previously.</p>

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	<p>to serve the Country park when the adjacent residential development is complete'. It might be useful to provide a planning application reference number.</p> <p>The final sentence of the section is not clear and should be rephrased.</p>		
10.8 - Residents Parking (page 36)	<p>There is no FBC policy on the introduction of Residents Parking Schemes.</p> <p>The responsibility for the introduction/modification of on-street parking controls, including residential parking zones, lies with the highway authority, Hampshire County Council and future advice should be sought from them.</p>	Advise contacting the Highway Authority (HCC) in respect of advice on the introduction/modification of on-street parking controls, including residential parking zones.	<p>Not met –</p> <p>Section 10.8 is now on page 38 of the Submission TNP.</p> <p>No further information has been provided detailing the views of the Highway Authority or how the Plan would seek to address this.</p>
Section 10.10 Trains (page 36)	Clarification should be provided that the train stations listed are the nearest to the Titchfield Neighbourhood Plan area for accuracy.	Advise providing additional clarification.	Not met – Section 10.10 is now on page 39 of the Submission TNP.
Section 10.12 – Cycling (page 37)	<p>The first sentence of the section states that 'cycling in and around Titchfield is difficult and hazardous in most areas' This statement should be quantified by sourcing accident data from the relevant authorities. The data can then be used to justify the statement regarding cyclists and pedestrians using the canal path. Potential cycle routes to key services and facilities should also be reviewed – schools, shops, etc.</p> <p>The shaded box in section 10.12 states that, "The NP is <i>not in favour</i> of cyclists using the canal</p>	<p>Advise providing additional data on cycling in Titchfield to justify the statements in Section 10.12.</p> <p>Advising providing further clarification as to how Map 7 relates to the TNP.</p>	<p>Partially Met –</p> <p>Section 10.12 is now on page 40 of the Submission TNP.</p> <p>The change to the first sentence has been made, however there is still a lack of detail on the levels of cycling currently being undertaken in the Plan area or the key destinations for both leisure and commuter cycling.</p>

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	<p>path". The neighbourhood plan should avoid the use of emotive language.</p> <p>In addition, it is not clear how Map 7 relates to the policies of the TNP further clarification should be provided in this respect. If the proposed cycle route is in aspiration this should be added in a companion document or annex to the plan.</p>		<p>Map 7 has been removed, in favour of Map 4.</p> <p>The statement "It is not safe to have speeding cyclists and walkers using the canal path at the same time" needs to be justified with evidence, this could include accident statistics over a 5-year period identifying the number of incidents occurring on the canal path. This can then be used to justify the statement, or conversely disprove it.</p> <p>The NP has recommended that a safe route is provided via Posbrook Lane, however the preceding text acknowledges that the Lane is narrow and vehicles travel at speed making it dangerous. This information is conflicting and confusing. The provision of cycling along the canal path would provide a safer, more direct route, and this should be considered.</p>
10.14 – Transport aims, objectives, policies and tasks (page 39)	The first paragraph of section 10.14 refers to Policy INF2 from the draft Fareham Local Plan 2036 but then does not provide any further information on this policy. It is suggested that this reference is deleted. The paragraph then refers to a quote from the Fareham Local Plan 2036. However, this quote is taken from paragraphs	<p>Advise deleting reference to Policy INF2. Amend source of quote to the Core Strategy.</p> <p>Advise amending the wording or deleting the aim as there is no mention of air</p>	<p>Partially Met –</p> <p>Section 10.14 is now on page 41 of the Submission TNP.</p> <p>It is welcomed that the reference to Policy INF2 has been removed.</p>

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	<p>4.46 and 4.47 of the Local Plan Part 1: Core Strategy (2011).</p> <p>The supporting text of the TNP seeks to limit the number of vehicles entering the village. However, the aim listed under section 10.14 seeks a traffic and parking environment. The aim is unrealistic and ultimately not achievable due to various polluting sources – cars, buses, delivery vehicles, residential borne pollutants such as open wood or coal-burning fires, businesses with extractors and combustion boilers or equipment. In addition, there is no mention of air quality in the supporting text to justify the aim.</p> <p>Revise the phrase ‘fit or disabled’ to read ‘all residents and visitors to the village’.</p> <p>The objectives and policies should be placed within the supporting text so that the objectives and policies can be seen to directly relate to the justification in the text.</p> <p>Suggest changing the title of this section as the policies and tasks are in section 10.12. The tasks listed in section 10.12 should be agreed with the Highways Authority (HCC). These tasks should be moved to a separate annex or document.</p>	<p>quality in the supporting text to justify the aim.</p> <p>Advise amending the phrase ‘fit or disabled’ to ‘all residents and visitors to the village’.</p> <p>The LPA advise considering whether the policies and tasks are more appropriately located in Section 10.12 – Traffic Policies and Tasks (page 40).</p> <p>Advise contacting the Highways Authority (HCC) to agree tasks listed in Section 10.12. Move these tasks to a separate annex or document.</p>	<p>Section 10.14 now starts on page 41 of the Submission TNP. The Aim in this section has not been amended as recommended.</p> <p>No supporting evidence in the Plan is provided to justify Traffic Objective T.3.</p> <p>Amendment to the text has been made and is welcomed.</p> <p>The objectives have not been moved to sit within the supporting text, which would provide justification to the Aims, or reference the aim throughout the text.</p>
Traffic Objective T.2 (page 39)	It is not clear how Traffic Objective T.2 relates to the policies in Chapter 10, or indeed the neighbourhood plan.	Advise either adding a policy in relation to Objective T.2. or delete the objective.	Not Met – Traffic Objective T.2 is now on page 41 of the Submission TNP.

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			<p>This objective has been amended to T.3, as noted above. Furthermore, there is no supporting text in the Plan that justifies the need for the objective.</p> <p>The new Traffic Objective T.2 could be combined with Objective T.1 due to the focus being on highway and pedestrian safety.</p>
Section 10.12. Traffic Policies and Tasks (page 40).	<p>There is already a section 10.12 – Cycling on page 37 of the plan. The section and subsequent section requires renumbering.</p> <p>In addition, the Tasks T.1 – T.6, Tasks T.2.1 – T.2.2 and PO.2. – PO.3 are predominantly the responsibility of the Highway Authority. Contact should be made in the first instance with the Highway Authority to consider whether these tasks can be agreed, and if so how these will be delivered and funded. Fareham Borough Council would welcome engagement in the discussions as the Local Planning Authority.</p>	Advise renumbering 10.12 – Traffic Policies and Tasks. Advise contacting HCC and FBC to agree Tasks T.1 – T.6.	<p>Now Section 10.15, page 42.</p> <p>Not Met –</p> <p>There is no evidence provided by the Forum that they have discussed the tasks with the Highway Authority.</p>
Policy G.A.1 Pedestrian Safety (page 40)	<p>Further clarification should be provided so that the policy can be applied with precision and clarity. Remove ‘seek to respond’ and replace with ‘maximise’.</p> <p>Consideration needs to be given into how this policy could be applied to planning applications. The policy also needs to be linked into the TNP</p>	Advise addressing the points.	<p>Not met.</p> <p>Policy GA.1 is now on page 42 of the Submission TNP.</p>

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	and justified through the supporting text where funding opportunities and the locations of the need for interventions are identified.		
Policy G.A.2 Cycle Links (page 40)	<p>The spirit of this policy is noted; however, the LPA is concerned how this policy would operate in practice, or if the approach is viable and deliverable. There is concern that requiring all development to provide cycle route to other affects may affect the viability of new development. The Forum have not provided any evidence to justify the policy requirements.</p> <p>Also, any new proposed cycle routes should be discussed with the Highways Authority (Hampshire County Council). Furthermore, there is no indication within the TNP of other areas, communities or infrastructure to which these new and improved cycle routes should link, for example schools, shops, tourist destinations etc.</p>	Advise providing further information to address the issues raised.	<p>Not Met –</p> <p>Policy GA.2 is now on page 42 of the Submission TNP.</p> <p>The text in 10.12 suggests routes to schools, shops etc, but does not elaborate on identifying the routes required to achieve this. Furthermore, there is no evidence of discussions with the Highway Authority to agree potential routes.</p>
Tasks T.2.1 – T.2.2.	The Council's Public and Open Spaces team have confirmed that the Council have no maintenance responsibilities in relation to the canal paths and recreational footpaths and these tasks should be amended to reflect this.	Advise amending wording as appropriate.	<p>(Renamed Community Aspirations, on page 44)</p> <p>Partially met –</p> <p>It is noted that Tasks T.2.1 and T.2.2 have been amended to Community Aspirations T.2.1 and T.2.2 in the Submission Plan.</p> <p>The reference to HCC and FBC in Community Aspirations T.2.1 (previously Task T.2.1) has been removed.</p>

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			It is advised that the reference to FBC should be removed from Community Aspiration T.2.2 (previously Task T.2.2).
10.13 Parking Objective 1 (page 41)	Add to the supporting text to demonstrate the need for additional parking provision and the extent of the required provision. The term 'adequate' in Parking Objective 1 should be quantified or deleted.	Advise providing additional supporting text to demonstrate the need for additional parking provision and the extent of the provision required. Advise deleting the term 'adequate'.	Parking Objectives, policies and community aspirations have been amended from 10.13 to 10.16 (now page 45) Not Met. No supporting text added to justify the policy. No definition of adequate has been provided, nor has the levels of parking needed been assessed or evidenced in the Plan or Appendices to justify Parking Objective 1.
Policy P.1 New Development Parking (page 41)	The LPA advise that a revision should be made to the first line to read 'new development within the plan area' as this covers all development. The policy states that any new development within the Plan area must be completely self-sufficient in terms of off-road parking. This then goes on to state that 'wherever possible' they should include the maximum levels defined in the FBC parking standards. These two statements are contradictory. Suggest removing the 'must be	Advise replace 'any new, expanded, commercial or housing development' with 'new development'. Advise deleting 'must be self-sufficient' and replacing with 'must comply with either the Council's Non-Residential Parking Standards SPD or the	Not Met Policy P.1 is now on page 45 of the Submission TNP. It is welcomed that the Policy references the LPA Parking Standards SPD, this should also be included in the supporting text.

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	<p>completely self-sufficient' with 'must comply with the relevant Parking Standards SPD'. In addition, self-sufficiency of parking may not always be achievable or viable depending on the nature of the development and constraints of the location.</p> <p>Developments should have taken account of current FBC residential and non-residential parking standards, this may not always be maximum levels, again due to site viability or site constraints.</p>	Residential parking Standards SPD'.	<p>The policy statement "New development within the Neighbourhood Plan Area <u>must comply</u> with the residential Parking Standards...' should be revised.</p> <p>It is suggested that the language used in stating '<u>must comply</u>' is too forceful as there may be occasions where the levels of parking defined in the SPD cannot be accommodated for justified reasons. Therefore, the sentence should be revised to read (for example), <i>New development within the Titchfield Neighbourhood Plan area should include appropriate levels of parking provision in line with the adopted Residential Parking Standards SPD'.</i></p>
CE. Policy 1. – Loss of Retail premises (page 44)	<p>There is a lack of information as to how applicants will provide sufficient information to comply with the policy requirements. It is strongly advised that further information should be provided in the supporting text to justify the rationale behind this policy linking to relevant evidence.</p> <p>Also, CE. Policy 1. states that proposals that result in the loss of retail units in specific locations in Titchfield Village will be 'resisted'. In line with principles of the NPPF (2012) it would be beneficial if the policy was worded in a more positive manner to provide flexibility over the life of the neighbourhood plan.</p>	<p>Advise providing further justification and additional clarification as to what the applicant would need to do to comply with the policy requirements.</p> <p>Advise re-considering policy wording in light of paragraph 16 of the NPPF (2012).</p> <p>The LPA advise that the Forum may wish to include wording in CE. Policy 1 for</p>	<p>Not met –</p> <p>Policy CE.1 is now on page 50 of the Submission TNP.</p> <p>It is noted that the title of Policy CE.1 has been amended to 'Conversion of Commercial Premises', and the previous policy wording has been amended.</p> <p>The policy wording as amended is unclear and confusing and could not be applied with precision to a planning application. In addition, in line with</p>

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	<p>As currently worded the policy does not support new or improved employment opportunities within the areas listed.</p> <p>In addition, a map which covers at least a side of A4, with a key should be included to support Policy CE.1 to provide clarity on the areas that the policy relates to.</p>	<p>the encouragement of new or improved employment opportunities.</p> <p>Advise providing a map, which covers a full A4 page, to provide clarity on the areas that Policy CE.1 applies to.</p>	<p>principles of the NPPF (2012) it would be beneficial if the policy was worded in a more positive manner to provide flexibility over the life of the neighbourhood plan.</p> <p>The LPA is concerned that there is a lack of information as to how applicants will provide sufficient information to comply with the policy requirements. It is strongly advised that further information should be provided in the supporting text to justify the rationale behind this policy linking to relevant evidence.</p>
CE. Policy 2. Accessibility (page 44)	<p>CE. Policy 2 is not in general conformity with a number of policies in the ALP, such as CS5. For example, CE. Policy 2 does not take into account for other transport forms and not focus on walking alone. Accessibility should include cycling, public transport, walking to key trip attractors including schools, shops, tourist destinations, etc.; and should not be based solely around the location on new development. New development should be planned to enable and facilitate access to local services and facilities as well as pedestrian, cycling and public transport routes.</p> <p>In addition, the policy refers to Planning Policy Guidance Note 13: Transport (2006) as providing defined walking distances in relation to the policy.</p>	<p>The LPA advises that the Neighbourhood Planning Forum revisits this policy prior to the submission of the plan.</p> <p>Advise that the reference to PPG13: Transport is deleted and the Forum consider using a different source in defining walking distance.</p>	<p>Not met –</p> <p>Policy CE.2 is now on page 50 of the Submission TNP.</p> <p>The LPA remains concerned that Policy CE.2 is not in general conformity with a number of strategic policies in the Adopted Local Plan.</p> <p>It is advised that the amendments previously suggested are made and the reference to PPG13 is removed from the policy text.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
	<p>The PPG13 was cancelled in 2012 and replaced by the NPPF (2012).</p> <p>Therefore, this source can no longer be used to provide a definition of walking distances. Furthermore, the definition of walking distance is unclear and confusing and could not be applied with confidence to a planning application. The Forum may wish to refer to the Council's Accessibility Study - http://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV14-BackgroundPaper-Accessibility.pdf</p>		
<p>12.3 Care for the Environment (pages 45 and 46)</p>	<p>The first paragraph of the section makes reference to 'energy efficiency measures' and 'housing improvements'. Energy efficiency measures are covered by building regulations.</p> <p>The third paragraph makes reference to 'a culture of a litter free area will be encouraged and support for the FBC vigilant approach to fly tipping should be adopted'. This is an aspiration rather than an objective of the plan and should be included in a separate annex or document to the plan.</p> <p>The explanation of SuDs is incorrect and should be amended from 'sustainable storm water drainage' to 'Sustainable Urban Drainage System'</p>	<p>Advise amending first paragraph.</p> <p>Advise adding the text as a separate task, which could be included in a companion document or annex to the TNP.</p> <p>Advise amending the explanation of SuDS.</p>	<p>Partially met –</p> <p>Section 12.3 is now on page 54 of the Submission TNP.</p> <p>The reference to sustainable storm water drainage has been deleted.</p> <p>The fourth paragraph which refers to a 'litter free area' is an aspiration and it is advised that this should be included in a separate annex or document to the plan.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
12.4 Open spaces (page 46)	<p>The second paragraph of this section makes the following statement 'These spaces are variously owned and maintained by <u>private individuals</u>'. This statement should be amended to 'public and private bodies'.</p> <p>Reference is made to the open spaces and that they 'could be protected under the Assets of Community Regulations 2012. This might be a future development after consultation with residents'.</p> <p>This is an aspiration rather than an objective of the plan and should be included in a separate annex or document to the plan.</p> <p>The Forum may wish to consider whether the open spaces listed in this section may be better included within the TNP as Local Green Spaces providing they fit within the criteria in the NPPF.</p>	<p>Advise amending statement to 'public and private bodies'.</p> <p>Advise adding the text as a separate task, which could be included in a companion document or annex to the TNP.</p> <p>The LPA advise the Forum to include a Policy on Local Green Space in the TNP.</p>	<p>Partially met –</p> <p>Section 12.4 is now on page 54 of the Submission TNP.</p> <p>It is welcomed that the statement in the second paragraph of this section now refers to 'public and private bodies'.</p> <p>It is advised that the reference to spaces being protected under the Assets of Community Regulations 2012 should be moved to a separate annex or companion document to the TNP.</p> <p>It is noted that the Forum have referred to the spaces as being classified as Local Green Spaces. However, it is advised that the open spaces should have been assessed as to their suitability to be designated as a Local Green Space at an earlier stage of the neighbourhood plan process as previously discussed with the Forum.</p>
Environment Objective E.1 and Environmental Objective E.2 (page 47)	<p>It is not clear how the objectives relate to policies in Chapter 12, or indeed in the TNP.</p> <p>In addition, Environment objective E.1 sounds more like a project and could be added as a task in a companion document or annex to the TNP.</p>	<p>Advise amending or deleting Objectives E.1 and E.2.</p>	<p>Partially met –</p> <p>Objectives E.1 and E.2 are now on page 56 of the Submission TNP.</p> <p>Objectives E.1 and E.2 from the Pre-submission TNP have been deleted.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
			These objectives have now been replaced by a new objective (BE.1).
Policy E.1 – New Development (page 47)	<p>The policy text would benefit from a multi-criteria approach. A number of the policy areas covered may fit within the policy in the neighbourhood plan on design. A different title may also be suitable, as “New Development” is quite broad and could cover a number of policy issues.</p> <p>In addition, the policy does not provide sufficient clarity so that it can be applied to a planning application. For instance, the policy text does not clarify how the impacts listed will be ‘assessed’ or ‘considered’. Strong consideration should be given to providing supporting text and evidence to justify the rationale for the policy.</p> <p>Furthermore, it is not clear how the policy relates to the Objectives in Chapter 12, or in the TNP.</p>	<p>The LPA advise the Forum to consider criterion-based policy or separate the issues covered into different policies.</p> <p>Advise providing further justification and evidence to explain the rationale behind the policy.</p>	<p>Partially met –</p> <p>Policy E.1 is now on page 56 of the Submission TNP.</p> <p>Policy E.1 on New Development has been deleted from the TNP and replaced by Policy BE.2. (Water, Energy and Flood Risk).</p> <p>The LPA remains concerned that the policy does not provide sufficient clarity so that it can be applied to a planning application. For instance, the policy text does not clarify how the impacts listed will be ‘assessed’ or ‘considered’.</p> <p>In addition, the reference to 'supporting the production of a Biodiversity Mitigation and Enhancement Plan (BMEP)' is a community aspiration rather than a policy requirement. It is advised that this part of the policy is moved to a companion document or annex to the TNP.</p>
Task E.1 (page 47)	Reference is made to SSI. This is incorrect and should be amended to ‘SSSI’ (Site of Special Scientific Interest).	Advise amending the reference to ‘SSI’ to ‘SSSI’.	Partially met –

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
	<p>Reference is also made to the Solent and Brent Geese Strategy 2010 which is due to be updated in 2018 and does not reflect current planning policies or the new site classification system currently used by Natural England and LPAs. A more updated document is the 'Solent Waders & Brent Goose Strategy 2018: Interim Project Report: Year one (October 2017)'. Therefore, the LPA suggests that a reference is made to the Interim Report, new classification system, 2017 current use mapping and the new (draft) Mitigation Guidance which have been considered since March 2018 for decision making by Natural England and Fareham Borough Council.</p> <p>The note under Task E1 states that '<i>leaving the EU may result in changes to these regulations</i>'. It is recommended that the specific 'regulations' are stated as for instance Ramsar sites are protected under the Ramsar Convention which is not relevant to the EU and SSSI sites are only protected under national law and not European legislation. In addition, this statement is irrelevant as remaining EU Regulations will be transposed into new UK Regulations.</p>	<p>Advise making reference to the updated Interim Project Report, classification system, current use mapping and new (draft) Mitigation Guidance.</p> <p>Advise providing specific reference to the relevant EU regulations.</p>	<p>Task E.1 is now on page 57 of the Submission TNP.</p> <p>Task E.1 has been separated into two separate policies: Policy NE.1 (Special Protection Areas) and Policy NE2 (Non-Statutory Sites and Initiatives).</p> <p>In relation to Policy NE.1 it is welcomed that the reference to SSSI has been amended.</p> <p>Policy NE1 is titled 'Special Protection Areas' but also refers to a SSSI and NNR and Ramsar, which do not fall into the category of 'Special Protection Areas'. Therefore, it is advised that this is changed to 'Statutory Designated Sites' to avoid the policy title giving the impression that it is only relevant to SPAs (Special Protection Areas).</p> <p>Policy NE.2 (Non-Statutory Sites and Initiatives) is currently unclear and could not be applied to a planning application with precision. It is advised that additional clarification is provided as to what the applicant would need to do to comply with the policy requirements.</p> <p>There is a lack of information as to how applicants will provide sufficient</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
			information to comply with the policy requirements for Policies NE.1 and NE.2. It is strongly advised that further information should be provided in the supporting text to justify the rationale behind this policy linking to relevant evidence.
12.8 Open Spaces (page 48)	It is unclear, what this section adds to the TNP. The Forum may wish to consider whether the open spaces listed in Section 12.4 may be better included within the TNP as Local Green Spaces providing they fit within the criteria in the NPPF	Advise including a Policy on Local Green Space in the TNP.	<p>Not met –</p> <p>Section 12.8 is now on page 59 of the Submission TNP.</p> <p>The LPA notes that Policy OS1 (Open Spaces) has been added to the TNP since the Pre-Submission consultation.</p> <p>There is a lack of information as to how applicants will provide sufficient information to comply with the policy requirements. The LPA strongly advises that further information should be provided in the supporting text to justify the rationale behind this policy, which is linked to relevant evidence.</p> <p>In addition, community aspirations OS2 – OS4 have been included in the Submission TNP. It is advised that these are moved to a separate annex or companion document to the TNP.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
Policy EN.1 Energy Efficiency (page 48)	<p>The policy reads more like an objective and does not provide sufficient clarity so that it can be applied to a planning application. The policy may fit better as a separate criterion within Policy H.4 of the TNP. Strong consideration should be given to providing supporting text and evidence to justify the rationale for the policy. Is the policy relevant to all new housing development or all development?</p> <p>In addition, it is not clear how Policy EN.1 relates to Objective EN.1 or indeed the aim listed under section 12.7.</p>	<p>Advise adding the moving the policy and including it as a separate criterion in Policy H.4 of the TNP.</p> <p>Advise providing further justification and evidence to explain the rationale behind the policy.</p>	<p>Not met –</p> <p>It is noted that Policy EN.1 has been amended to Policy BE.1.</p> <p>The LPA remains concerned that the policy reads more like an objective and does not provide sufficient clarity so that it can be applied to a planning application. In addition, further justification and evidence should be provided to explain the rationale behind the policy.</p> <p>There are a number of community aspirations (BE1 – BE4) that have been added to the plan since the Pre-submission consultation. These should be included in a separate annex or companion document to the TNP.</p>
12.9 Aims, objectives and task (page 49)	<p>It is not clear whether the last box on the page is an aim, objective or task. Further clarity should be provided in this respect.</p> <p>In addition, any tasks in this section should be included in a companion document or annex.</p>	<p>Advise providing further clarification as to whether the last box on the page is an aim, objective or task.</p>	<p>Partially met -</p> <p>It is noted that the last box on the page has been deleted from the TNP.</p> <p>However, it is advised that any community aspirations in this section should be included in a companion document or annex.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
Chapter 12 – Historic Titchfield (page 51)	<p>There appears to be two Chapter 12's in the TNP. This chapter should be renumbered to 13.</p> <p>It is recommended that the supporting text within this chapter makes reference to the existing Conservation Area Appraisals.</p>	<p>Advise amending to Chapter '<u>13</u>'</p> <p>Advise making reference to the relevant Conservation Area Appraisals.</p>	<p>Partially met –</p> <p>It is welcomed that the chapter has been renumbered.</p> <p>Chapter 13 refers to the Titchfield Conservation Area Appraisal. However, there is also a Conservation Area Appraisal for Titchfield Abbey, which falls within the Designated Neighbourhood Area. This should be referenced in this section.</p>
13.5 The Great barn (page 52)	<p>The first paragraph of this statement refers to the Barn as being built in the early 14th century. The Historic England heritage listing for the monastic barn of Titchfield Abbey has the Barn as being built in the 15th century - https://historicengland.org.uk/listing/the-list/list-entry/1094235 The paragraph should be amended for accuracy.</p> <p>In addition, the second paragraph of the section notes that the Barn was 'acquired by FBC'. This sentence should be deleted as the Barn has never been within the ownership of FBC.</p>	<p>Advise making the suggested amendments.</p>	<p>Partially met –</p> <p>Section 13.5 is now on page 52 of the Submission TNP.</p> <p>It is welcomed that the reference to the Barn being 'acquired by FBC' has been removed.</p> <p>However, the TNP still refers to the Barn as being built in the early 14th century. It is advised that the paragraph is amended for accuracy.</p>
13.11 Titchfield carnival (page 54)	<p>This section of the TNP goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP.</p>	<p>Advise including section 13.11 in a companion document or annex.</p>	<p>Partially met –</p> <p>It is welcomed that section 13.11 on the Titchfield Carnival has been amended to Community Aspiration HT.5.3. However,</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
			it is advised that all community aspirations in Chapter 13 should be moved to a companion document or annex to the TNP.
13.13 A wayfarer map - and 13.14 Publications (page 54)	These sections of the TNP goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP.	Advise including sections 13.13 - 13.14 in a companion document or annex.	Partially met – Section 13.13 is now on page 68 of the Submission TNP. It is welcomed that section 13.13 on the Wayfarer Map has been amended to Community Aspiration HT.5.6. It is also welcomed that section 13.14 has been amended to Community Aspiration HT HT3.2. However, it is advised that all community aspirations in Chapter 13 should be moved to a companion document or annex to the TNP.
Objective HT.5 (page 55)	This objective goes beyond the remit of planning and would be better placed as a task or project in a companion document or annex to the TNP. In addition, further clarity should be provided in relation to the terms 'presentation' and 'promotion' as the sentence as currently read is unclear.	Advise including objective HT.5 in a companion document or annex.	Not met – It is advised that Objective HT.4 (previously HT.5) is moved to a companion document or annex.
Policy HT.1 Preserving Historic	The policy refers to 'Development proposals that fail to preserve', consideration should be given as to how this policy wording would accord with paragraph 16 of the NPPF. Furthermore, the	Advise amending the wording of the policy so it provides a more positive approach and consider the	Partially met – Policy HT.1 is now on page 66 of the Submission TNP.

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
Environment (page 55)	<p>scope of the policy as it currently stands is unclear. For instance, the word 'significance' is associated with heritage assets in the NPPF, and some heritage assets have 'significance' but are not designations. Further clarification should be provided in the policy text.</p> <p>Further information to justify and explain the rationale behind the policy should be provided in the supporting text of the Historic Titchfield section in the neighbourhood plan.</p> <p>In addition, it is not necessary to provide a source or reference for a policy, this should be deleted.</p>	<p>wording in light of the relevant section of the NPPF (pages 54-57).</p> <p>Advise moving reference to the NPPF to the introductory text of the section where relevant.</p>	<p>The policy wording has been amended in line with Historic England's comments on the plan.</p> <p>It is welcomed that the reference/source in the policy has been deleted.</p> <p>However, the LPA remains concerned that further information to justify and explain the rationale behind the policy should be provided in the supporting text to the TNP.</p>
Policy HT. 2 Archaeological Assessment (page 55)	<p>The requirement for an archaeological assessment to be provided for all new development is onerous. Any requirement for an archaeological assessment is set out on Hampshire County Council's website - http://documents.hants.gov.uk/sold-services/sharedexpertise-capabilitystatement-Archaeology.pdf Hampshire Archaeology are notified of applications where their planning constraint maps show an archaeological alert and so are assessed on a case by case basis. It is unnecessary to include this as a policy in the TNP and as such this policy should be either be deleted or amended to meet the above requirements.</p> <p>In addition, the term 'merited' could not be applied to a planning application with precision.</p>	<p>Advise making the recommended amendments.</p>	<p>Not met –</p> <p>Policy HT.2. is now on page 66 of the Submission TNP.</p> <p>It is advised that the policy should be deleted or amended to meet the requirements previously commented on by the LPA during the Pre-submission consultation.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
Tasks HT.2 – HT 5.4 (pages 56 and 57)	<p>If the Forum wish to pursue Tasks HT2.2 and HT 5.1 it is suggested that they contact FBC. In addition, the Forum should note that any aspirations related to non-land use matters should be set out in a companion document or annex as stated in the PPG.</p> <p>Further clarification should be provided on all tasks listed within Chapter 12 – Historic Environment in terms of how these will be delivered.</p>	Advise making suggested amendments.	<p>Not met -</p> <p>It is advised that all community aspirations should be set out in a companion document or annex to the TNP. Also, further clarification should be provided on how these aspirations will be delivered.</p>
Appendix 18 – The History of Titchfield	There are a number of claims and statements made within this Appendix about the history of people, places and events. The Council’s Conservation Officer considers that there should be rigorous evidence to support these claims.	Advise providing evidence to support the claims/statements in Appendix 18.	Not met.
Appendix 35 – Natural Environment	<p>Reference is made to the Solent and Brent Geese Strategy 2010. There is a more recent document that has been published (see comments on Task E.4 above) ‘Solent Waders & Brent Goose Strategy 2019: Interim Project Report: Year one (October 2017)’. Therefore, the LPA suggest that a reference is made to inform of the Interim Report, new classification system, 2017 current use mapping and the new (draft) Mitigation Guidance which have been considered since March 2018 for decision making by Natural England and Fareham Borough Council. Page 3, Paragraph 4 of Appendix 35 refers to ‘seroline’ to be changed to ‘serotine’. The use of ‘pipistrelle’ and ‘long-eared’ should be re-considered. Pipistrelle is a general term used and</p>	<p>Advise making reference to the updated Interim Project Report, classification system, current use mapping and new (draft) Mitigation Guidance.</p> <p>Advise amending ‘seroline’ to ‘serotine’.</p> <p>Consider amending reference to the types of bat species.</p> <p>Advise amending ‘protected amphibians and reptiles’ to ‘protected/notable’.</p>	<p>Partially met -</p> <p>It is noted that Appendix 35 now provides further clarification on the Solent Waders and Brent Goose Strategy.</p> <p>It is welcomed that the reference to amphibians has been amended.</p> <p>However, the LPA advises amending the references to the types of bat species.</p>

Policy/ Section in the Pre- Submission Plan	Comments made on the Pre-Submission Plan	Options/Potential Changes suggested on the Pre-Submission Plan	Have the changes made in the Submission (Reg 16) Plan addressed the comments raised at Pre- Submission?
	<p>there are 3 species of pipistrelles including common, soprano and Nathusias. Similarly, long-eared is a general term and there are 2 species including brown and grey long-eared bats. Therefore, long eared and brown long-eared bats cannot be counted as two different species; similarly, pipistrelle and soprano pipistrelle cannot be counted as two types of bats.</p> <p>Page 3, Paragraph 5 of Appendix 34 refers to 'Protected amphibians and reptiles' to be changed to 'Protected/notable' as common frog and common toad do not receive the same level of protection as reptiles and great crested newts (not protected against killing/injuring or habitat destruction).</p>		

Annex 1 – General observations and suggestions

Pre-submission Titchfield Neighbourhood Plan		Not met/Partially met/Comments
Evidence	A general issue that has been identified by the LPA is the lack of appropriate evidence which could be linked to the supporting text for the policies of the TNP.	Not met – The LPA remains concerned that there are still several policies in the TNP that are not supported by appropriate evidence.
Content	It is considered that the flow of the TNP could be improved to aid clarity and overcome disjointedness.	Not met.
Paragraph Numbering	It is recommended that for ease of reference that paragraph numbers are inserted in the TNP prior to submission. This will ensure the plan is clearer for the reader and may ensure that comments received for consultation on the plan are in relation to the relevant areas.	Not met.
Use of Capital Letters	There should be consistency throughout the neighbourhood plan in terms of the use of capital letters, such as Country Park.	Not met
The use of Aims, Objectives, Policies and Tasks	<p>The use of aims, objectives, policies and tasks within the TNP without any supporting wording to provide additional clarification is confusing.</p> <p>Policies should be positively worded to ensure accordance with paragraph 14 of the NPPF. Avoid the use of statements in policies.</p> <p>It is suggested that a short vision statement (couple of sentences) is included in the TNP, which sets out the key policies in achieving this vision, which could be used in determining planning applications and demonstrates conformity with the strategic policies of the ALP.</p>	<p>Partially met –</p> <p>It is noted that Chapter 6 of the TNP includes a set of vision statements and the policies relevant to the achieving these statements.</p> <p>However, the LPA still remains concerned that the aims, objectives, policies and community aspirations in the TNP lack supporting text to provide additional clarification.</p>

	<p>The PPG sets out that those aspirations that deal with 'non-land use matters should be clearly identifiable and set out in a companion document or annex'. Therefore, the LPA advises that 'tasks' identified by orange boxes in the plan should be moved into a companion document or separate annex to the TNP. In terms of the tasks listed throughout the plan, further explanation could be included on the current status of these projects and/or how these will be delivered by the Forum.</p>	
Photos, Images and Maps	<p>Improve the resolution of some of the photos, images, and maps in the Plan. In addition, all maps should have a key provided and should cover a full size of A4 to provide clarity and precision. This will aid ease of referencing. The maps should be referenced to the supporting text and explained accordingly. All maps, images and photos in the TNP should have titles to clearly define what the map is illustrating and a figure. Furthermore, these should all have sources to provide a reference as to where the photos, maps and images were obtained, and should be clearly linked to the main body of the report.</p>	Not met.
Typos and Grammar	<p>There are several typos throughout the neighbourhood plan, these should be reviewed and amended prior to the submission of the plan.</p> <p>In addition, several sentences within the TNP are unclear and confusing and should be revisited prior to submission of the plan.</p>	Not met – there are still typos prevalent in the TNP. It is advised that these are amended.

Glossary of Terms	<p>The references to FBC and TVT are acronyms rather than glossary terms and should be moved to the front of the TNP.</p> <p>In addition, the Forum may wish to check some of the terms against the definitions in the NPPF.</p>	Not met.
Appendices		
Typos	There are several typos throughout the appendices, these should be reviewed and amended prior to the submission of the plan.	Not met.
Relevance	There are a number of appendices that do not relate to the TNP or land use matters. Further explanation should be provided as to why these appendices have been included or they should be removed from the plans evidence base.	Not met.