

Explanatory Note EN/A Format and repetition

Background.

The TNP has been prepared to demonstrate that it has considered all the relevant issues identified both by Parishioners and others, and that the necessary policies are in place. TPC see it as important that the TNP is a comprehensive and complete plan for the whole Parish and has written it on that basis. This is for the benefit of the many readers and users of the plan, not simply of the Development Control Officers but also of local people and the very many different individuals who visit Twyford and do business in the Parish.

Comments on Pre-Submission Draft

Several people commented that the TNP was both readable and logical in its presentation.

SDNPA comment that a number of the TNP policies refer to policies within the South Downs Local Plan (SDLP), for example many TNP policies include policy requirements to comply with a specific policy of the SDLP. If the TNP successfully passes Examination and Referendum it will form part of the Development Plan, therefore there it is not necessary to make reference to SDLP policies. National Planning Practice Guidance requires NDPs to prepare policies which are clearly written, concise and precise serving a clear purpose and avoiding unnecessary duplication of policy. It is recommended that all reference to SDLP policies is removed from TNP policy. Policy reference could be included within the supporting text of each relevant policy if necessary.

Pro Vision make the same points and recommend deletion of multiple policies.

Twyford Parish Council (TPC) response.

TPC accept that TNP should not duplicate the SDLP. Before publishing the Pre-Sub version, TPC made strenuous efforts to avoid this, including a comprehensive revision of the plan at an earlier stage, while the SDLP was moving forward to replace the Joint Care Strategy. TPC accept that the Pre Sub Plan still contains duplication of some policies. These have now been reviewed and amended accordingly.

However, the suggestion of moving every reference to SDLP from the TNP policies, together with the deletion of a significant number of TNP policies entirely, is much more of a problem. In the first place we cannot see that retaining a policy (for instance for Nature Conservation) by identifying the relevant SDLP policy to be applied is duplication. TPC see this as signposting. Of course, it is possible to signpost – as SDNPA suggest – by moving the reference to the supporting text. TPC see this as a matter of presentation rather than of substance.

Signposting is helpful to all concerned where two separate documents form the development plan, and must be considered in each and every planning application. This is the case where there is a Neighbourhood Plan; it demonstrates that the Neighbourhood Plan has taken proper account of the policies of the Local plan and is meshed into them.

A further benefit follows from the precedence given to the most recently approved plan. In the period before the SDLP is revised the TNP will take precedence in any conflict. The TNP is drafted to indicate where there may be any points of difference.

SDNPA have proposed removing policies which are of the highest importance to the community, for instance, the one for Twyford St Mary's, the village Primary school. (CP3) Deletion here would make the plan significantly less relevant.

Other policies proposed for deletion include, for instance, Community facilities and Nature Conservation, both key elements in the land use of the parish. TPC see that the identification of relevant sites on a parish basis justifies the retention of the policy. These and other policies have been reviewed, and TPC have ensured that all policies are "Twyford specific". Taking the Nature Conservation policies as an example, the designated areas are identified on a plan, their value is endorsed and the policy to be applied is then stated. The policy follows that of SDLP. Thus the policy is fuller and more informative than SDLP and confirms the support of the Twyford Community for key parts of their daily environment. It should be noted that TNP includes stronger and more specific policies than either the TNP Pre-sub or SDLP for the Itchen SAC, at the request of Natural England.

TPC are also unwilling to remove the many TNP policies as proposed by SDNPA. TPC are strongly of the opinion that applying the SDNPA's interpretation of the Government's guidelines on "no repetition" will impede the public's understanding of the planning vision for the National Park, and of Twyford's place in it, and of the planning policies which deliver this. Signposting from one document to the other is vital to this objective. In short TPC is not convinced the SDNPA have fully considered the proposed changes to TNP from the public's point of view. If the TPC is to delete whole policies, the implication is that the explanatory text is also unnecessary leading to radical recasting of the whole document. TPC hope that after 5 years preparation work and very close monitoring and co-operation by SDNPA, this is not what SDNPA is proposing.

Action by TPC:

1. Examined each policy to ensure no repetition of policy
2. Redrafted those policies which are Twyford specific and delete others which are generic.
3. Re-labeled "Relationship to other policies" as "Relationship to South Downs Local Plan". Only include "and other policies" for those policies which rely on additional land use policies.
4. Included extra explanation in Introduction