

ASHINGTON
NEIGHBOURHOOD PLAN 2018 – 2031 HEALTHCHECK COMMENTS
May 2019



Thank you for submitting a draft of the Ashington Neighbourhood Plan to HDC for an informal health check. It is clear that a great deal of hard work has gone into the preparation of the plan to date.

The comments set out below provide a number of more general and detailed comments on the plan, together with an explanation as to why the comment has been made.

The level of work and effort put into the Neighbourhood Plan and the attempts to make the evidence base is to be commended. Every attempt has been to meet the Objectively Assessed Need locally through the allocation of site which are deliverable and available.

Please ensure there is explanation in the plan which provides a clear context to a commitment to review the plan in 2021 as the HDPF is being reviewed.

Summary of General Issues:

1. The plan has been positively prepared. There are no significant showshoppers and it is envisage the Regulation 14 consultation will further refine the plan positively.
2. Please ensure all maps, figures, tables are numbered/formatted correctly.
3. On the NPPF, please ensure you are referencing the 2018 version, not the 2011 version as this leads could lead to inconsistency.
4. Policies should be given paragraph numbers – this makes the document easier to use and refer to when applicants and planning officers are using the plan to make applications / decisions.
5. It is commendable that your engagement with developers has been positive. Please confirm all infrastructure requirements are secured through policy wording and there is complete clarity on what is expected of in terms of contributions. Please ensure infrastructure contributions are aligned with national policy (NPPF).

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
General	Ensure that the Inset Map/Policies map reflects land accurately. It is recommended that the additional amendments to the BUAB to accommodate the new allocation is delineated as being 'proposed amendment to the BUAB' and effectively marked as a broken black line as opposed to a solid black line for the existing BUAB. When the plan is made those allocations accepted by the examiner and supported by a positive referendum result, the BUAB will be amended to a solid line to denote it is adopted.	To accord with legislation . The Policies Map shows allocations and designations arising from policies in the local plan or neighbourhood plan. The Policies Map should be a map which— (i) identifies the location and boundaries of allocations and designations, (ii) is reproduced from, or based on, an Ordnance Survey map, (iii) shows National Grid lines and reference numbers, and (iv) includes an explanation of any symbol or notation which it uses.
General Para 2.32	Elderly... [insert] and specialist care	Correction for clarity.
General	It is suggested that the Neighbourhood Development Plan is referred to by only one term throughout the document. The document has been referred to in a number of different forms, including the "ANP" "Neighbourhood Plan" "Development Plan", the "Plan", the "Neighbourhood Development Plan" and the "Ashington Neighbourhood Plan". For clarity, it would be useful to refer to the ANDP by one term only to avoid any confusion with the HDPF (Development Plan and Plan could also to the HDPF).	For clarification and efficiency.
General	Policy criterion should be numbered throughout the plan. This is applied inconsistently throughout the plan. Bullet points should be replaced accordingly.	For clarification and efficiency.

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General Economic Development	It is noted the plan correctly highlights the need for office and move on accommodation but does not then identify new locations or allocations (other than west of the school). The sites list has land adjacent to Kates Cakes (CSM Bakery) but the assessment is only for residential use. There are no policies or objectives that relate to the visitor economy nor to the need to protect existing employment floor space. However, if the ANP is silent on these issues the wider local plan policies will be enforced.	For clarification and efficiency.
General	<p>Within the 'Assets and Treasures' document lies appendix 4: Woodlands, Natural & Green Spaces, TPO's. This includes a map indicating areas of designated Ancient Woodland, presumably taken from the Revision of the Ancient Woodland Inventory for West Sussex (January 2010), downloadable on the government's MAGIC website. As inclusion within the inventory represents a specific designation and an absolute (a tract of woodland is either within the inventory or it isn't).</p> <p>Within the appendix is a map indicating sites of 'Deciduous Woodland'. Please ensure it accurate. By way of example, to the west of Ivy Lane is a tract of woodland known as Ivy Copse; this is deciduous (oak-based) woodland, and additionally is protected under TPO/1060. It is not included on the map.</p> <p>As it is included in a section entitled 'assets and treasures', parishioners may expect such wooded areas to be subject to some kind of constraint (over and above the need to gain a licence from the Forestry Commission for large-scale felling), such as a TPO. Where such 'unprotected' woodland exists, any landowner retains the right to deal with it as he sees fit – including the extraction of timber by way of felling. If HDC adopts the Plan with this map in place, it intimates an 'involvement' through both ourselves and the Parish Council – when in reality the fate of the woodland is purely down to the wishes of the landowner. Please ensure the plan is accurate and perhaps some wording to explain the context of the assets and treasures paper so to avoid confusion on when the relevant parties can or cannot intervene.</p>	To meet the basic conditions and ensure alignment with national guidance.
General	Is it noted there is an asset document which stipulates a number of community space as being important to the local community. Is it the intention to protect these spaces? It is noted there is no Local Green Space policy cited within the plan which would afford significant statutory weight to the protection of those green spaces which meet the tests in the national policy.	For clarification.
General Site Assessment Spreadsheet	Land East (Typo? is it meant to be west?) of Old School (Site 27) is not referenced in the Site Assessment Decision Update July 2017. Location of site 27 no is not shown on the map (March 2019). It is noted within the spreadsheet that the text referring to Site 23 is struck out but within the Site Assessment Decision update July 2017 Site 23 remains.	For clarification and consistency

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	It isn't clear from the Site assessment map also how Site ASH11 is delineated. Is the site part of No. 5 and the land to the north of Site No. 5? How has this been assessed in the Site Appraisal Spreadsheet?	
Policy ASH1	<p>Criterion D (a) tourism should be included as an appropriate use.</p> <p>It is suggested that it may be useful for policy ASH1 to refer to the following:</p> <p>ASH1 seeks to accommodate all new development within the Built up Area Boundary of Ashington and does not take account of brownfield sites in more rural areas. It is suggested that Policy ASH 1 should also refer to previously developed land which has already been built on and the role that this can have in providing appropriate alternative sites for new development outside of the BUAB providing the proposal accords with national and local policy. This will ensure flexibility.</p> <p>Utilities Infrastructure are generally covered by permitted development rights.</p>	For clarification
Policy ASH 2	Criterion C and E: Replace 'encouraged' with 'supported'	For efficiency and clarity.
Para 5.7	<p>Re-word preamble in final paragraph</p> <p>Policy ASH2 seeks to enhance the quality of facilities for walking, and a reduction in the reliance on and use of private motor vehicles, particularly for short and local journeys. Proposals for new public car parking provision should be carefully located and full justification will be required for the need and the proposed location.</p>	For efficiency
Policy ASH3	<p>Support is given to the Methodist Church and The Old School and Old School House as Local Heritage Assets as they do meet the criteria to be considered for adoption as Locally Listed Buildings.</p> <p>Suggest that ASH3 Point C is re-worded as follows:</p> <p><i>For residential development, off street parking spaces can take the form of spaces or garaging / car port facilities but must be permanently available and retained for private parking use for occupiers of the associated dwellings</i></p>	For efficiency and clarity.
Para 5.12	<p>Why the Green Box Text? There are no other text boxes like this. The assumption is that is a non-statutory community aim and provides a sense of direction on where the local community want to invest their CIL monies in. It would be useful to provide some explanation to the purpose of a community aim. Furthermore, has there been consideration of Infrastructure Deliver Plan which highlights future spending priorities of the Parish Council.</p>	Clarification sought.

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Policy ASH4	<p>It is suggested that the policy be re-worded as follows:</p> <p><i>‘Development proposals affecting local heritage assets (whether designated or non designated) either directly or indirectly should respect the significance of and context of the asset as well as the positive contribution that the heritage asset makes to local character and distinctiveness of the area. It should be demonstrated how proposals will contribute to the conservation and enhancement of the heritage asset and their setting. In particular the following buildings are considered to represent local heritage assets:</i></p> <p><i>The Methodist Church</i> <i>The Old School and Old School House Rectory Lane’</i></p> <p>A link could be included in the supporting text to provide further context and support: https://britishlistedbuildings.co.uk/england/Ashington-horsham-west-sussex#.XJkRouj7RhH</p>	<p>To ensure that the historic character and heritage of the settlement is protected and enhanced through policy where appropriate. To meet the Basic Conditions.</p>
Policy ASH5	<p>Support is given to this policy however it is suggested there is consideration of the nature of a landscape buffer. A prescribed buffer of 5 metres is considered to be too prescriptive. A landscape buffer doesn’t necessarily mean a heavily planted strip of land and it can be simply open space denoting a transitional space depending on the character of the area and what would suit the adjacent countryside or specific proposals. It is important to highlight the transition between urban edge and the wide-open countryside perhaps in the supporting text. The policy could support the implementation of a buffer could be accommodated through the provision of SuDs, formal open space or play space.</p>	<p>For clarification.</p>

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Policy ASH6	<p>It is suggested that it may be useful for the policy to refer to the following links and in the supporting text. The policy should also be aligned with national guidance:</p> <p>Planning Practice Guidance – Noise https://www.gov.uk/guidance/noise--2</p> <p>Noise Policy Statement for England (NPSE) March 2010 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69533/pb13750-noise-policy.pdf</p> <p>Regarding Policy ASH6: Noise Impacts.</p> <p><i>“Development which, by virtue of its proximity to the A24 road, could experience detrimental health impacts in terms of noise levels, must demonstrate that all such impacts can be adequately mitigated. This includes both indoor and outdoor, i.e. garden, noise impacts.”</i></p> <p>Given the elevated nature of A24 by Ashington noise in external spaces can be different to adequately controlled noise pollution without careful acoustic design of any development. It’s unlikely that a two-storey development would be of sufficient height to provide effective acoustic shielding. Such considerations may also have implications for the existing street scene/design and massing etc. It may be worth including a reference to the ProPG: Planning & Noise – New Residential Development guidance document in the supporting text and published by the Institute of Acoustics which includes much more detailed information on assessing and mitigating noise. The DEFRA Road map 2016 (Assets and Treasures 2017) is noted although there is no supporting text to explain what the different colour keys are meant to represent. A suggestion would be to link this policy to the noise map (the policy applies to those areas which are actually affected by excessive noise pollution as delineated on the noise map) but perhaps you may need a greater sample beyond 16 hours.</p>	To ensure the plan is aligned with national policy and to meet the basic conditions.
Policy ASH7	The policy is quite specific referring to Mill Lane while the actual policy looks to address local flooding (surface water flooding presumably) which implies a parish wide policy for flooding. Perhaps a suggestion would be to revise the title of the policy to reflect a localised specific policy to address flooding in Mill Lane.	To meet the basic conditions

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	<p>Will the Flood Study Report for Mill Lane be available as part of the evidence base? Please ensure the validity of the report has been check with EA or WSCC as the lead flood authority.</p> <p>ASH8 B New Development – particularly the sites allocated in Policies ASH10 to AH12 will be expected to either provide on-site community facilities or contribute towards the provision of the following new and /or improved community facilities:</p> <p>General comment: Planning obligations (infrastructure provision) must meet the tests as stipulated in the NPPF (paragraph 56). New development cannot address existing shortfalls. It must be acknowledged it is not always possible to deliver infrastructure improvements on land the developer does not control.</p>	
Policy ASH8	<p>The community cluster initiative is supported as it looks to focus on the aspirations of the community to develop a ‘focal point’ in the village.</p> <p>Ensure all infrastructure requirements are deliverable and conform to national policy (NPPF). The expectation is that you have discussed the requirements with the landowners and the policy is stringent on what is required. Furthermore, the requirements should also be made explicit within the actual site specific policies.</p>	To meet the basic conditions.
Policy ASH9	<p>Suggest remove small alphabetical ref a b c and replace with numerical i ii iii – this will provide a clear distinction between main criterion and sub criterion parts of the policy.</p> <p>Support is given to this policy. Has there been any consideration of a formal allocation for commercial use land use in the plan.</p> <p>Policy ASH9 that do seek to encourage new commercial floorspace appear to be unduly restrictive in referring to B1 use only. Whilst it is acknowledged there are issues of relocating a B2 use, many of the local businesses seeking accommodation do not neatly fit into a B1 designation and whilst they are B2, can easily be accommodated in a rural location. It is recommended the policy be amended and reference to Use Class B1 is removed to allow for greater flexibility.</p>	For clarification and greater flexibility.
Policy ASH10	<p>It is suggested that the bullet points for the related criteria are removed and replaced with numbering. This is make it easier to reference policy criterion in reports and in committee.</p> <p>Please note (second bullet point): it provides a mix of dwelling sizes in accordance with HDPF Policy 16. Please note replace reference to ‘HDPF 16’ with ‘development plan’. This ensure any policy which is superseded by the review of</p>	To ensure it meet the basic condition and providing clear direction on the policy.

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	<p>the HDPF will also be captured. You will effectively be future proofing the neighbourhood plan against policies which may change as a result of the HDPF review.</p> <p>Policy ASH10 – Can 75 dwellings be accommodated within this site? Has the developer indicated this is the number they are proposing (30 dwellings per hectare is a good starting point for development in rural villages – usually higher densities are appropriate in more urban areas or when a site is located next to a transport hub). The higher density may also reflect the need for smaller units to meet the need but this should be made explicit in the policy. To avoid misinterpretation by case officers and developers it is worth perhaps being more stringent in the supporting text.</p> <p>Bullet point 7 - Planning obligations (infrastructure provision) must meet the tests as stipulated in the NPPF. New development cannot address existing shortfalls.</p> <p>It must be acknowledged it is not always possible to deliver infrastructure improvements on land the developer does not control.</p> <p>It may be worth being explicit about the gym equipment you are requesting. It is not clear from the policy if the gym equipment will be catering for older person or for younger people or both. A suggestion would be to have a glossary within the plan which is explicit about terms.</p> <p>Please note Policy ASH10 Chanctonbury Nursery. The issue of land contamination arising from this historic use (old nursery sites could have used nitrates and pesticides and there may be residual traces left in the ground) may be significant and the costs of any clean up may impact the viability, and therefore the housing mix, of any future development. There appears to be no consideration of this in the allocation. It is suggested as part of the policy a requirement to consider the submission of a desktop environmental report as part of any application.</p>	

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ASH11	<p>It is suggested that the bullet points for the related criteria are removed and replaced with numbering.</p> <p>Has the percentage of “25%” requirement for dwellings to be modified to meet the requirements of older persons justified through robust evidence.</p> <p>Amend wording of 6 bullet point as follows: Open space in the west of the site is available for public access</p> <p>Bullet point 8 - Planning obligations (infrastructure provision) must meet the tests as stipulated in the NPPF. New development cannot address existing shortfalls.</p> <p>It must be acknowledged it is not always possible to deliver infrastructure improvements on land the developer does not control.</p>	For clarification and efficiency.
ASH12	<p>It is suggested that the bullet points for the related criteria are removed and replaced with numbering. Please align the policy with the inset map (on page 37 – please number/reference the maps for completeness) which sets out developable areas and is explicit on the land uses (residential/community/open space) which is considered appropriate. 15 hectares is a significant parcel of land which potentially can provide up 450 homes @ 30 dwellings per hectare. This not the intention of the policy. It is proper to state a minimum quantum for development however you do not want to be misconstrued and give the developer an opportunity to put housing on land for intended community uses if for reasons such as viability they cannot provide the community infrastructure and decide to put housing on there instead.</p> <p>There is little reference to the potential impact of development on the historic setting of Church Farm House and St Peter’s and St Paul’s Church on Land at Church Farm House (ASH12) and Land West of Ashington School (ASH11). There is no indication that a consideration of the significance of visual and perceptible links to the open countryside to the west of the existing settlement are significant to the special interest of the listed buildings especially Church Farm House. You would expect the historic farm house to have visual connections with its worked landscape and closing views to the west, with the introduction of housing this may harm the setting. HDC would like to see evidence that an assessment of views beyond Church Farm House and the church has been undertaken and that any important views are referenced in the Policy.</p> <p>It is noted the Methodist Church and The Old School and Old School House should be considered non-designated heritage assets and do meet the criteria to be considered for adoption as Locally Listed Buildings.</p>	For clarification and efficiency. To meet the Basic Conditions.

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