

**Kirdford Neighbourhood Plan**  
**Summary of representations submitted by Chichester District Council to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act**

<b>Name</b>	<b>Summary of Representation</b>
Banner Homes (Genesis Town Planning)	There is limited demand for Work / Live units in Kirdford
	<p>Community Proposal 1(A)</p> <p>In order to contribute to sustainable development as defined in the NPPF (paragraph 14) it is important for the Kirdford Neighbourhood Plan to have some in built flexibility to meet the objectively assessed needs of the area. We note that the football field is proposed as a reserve site to provide this flexibility but this will only work if it can be relocated timely within the Policy Proposal 2(B) Village social and Recreational Hub development site. However the phasing of this site is proposed for a 1-10 year period (Neighbourhood Plan page 78) so the football field relocation might not be deliverable in the short term. To overcome this uncertainty and to ensure there are sufficient site allocations to meet housing need we suggest therefore that the housing capacity of the Policy Proposal 1 site north of Kirdford Growers is increased. The level of increase will depend on the eventual housing numbers allocated to Kirdford in the Chichester Local Plan but we suggest it could be in the region of 60-80 dwellings total. The site is large enough (2.5 ha) and the District Council's Strategic Housing Land Availability Assessment (SHLAA) under site reference KD 0839 shows it has capacity for 80 dwellings. Notwithstanding the above, we are unclear whether the Proposal 1(A) is a policy or not. If it is not, it duplicates actual policy KSS1. In which case, following Section 38B of the 2004 Act, Proposal 1(A) could be deleted altogether or its text combined with the site allocations policy KSS1.</p>
	<p>Policy CP1</p> <p>Paragraph 173 of the Framework advises that pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans have to be deliverable and sites and the scale of development they identify should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p> <p>Policy CP 1 therefore needs to be amended to ensure that any contributions to support community development are subject to overall viability considerations. This amendment would be consistent with the wording of other policies such as KSS1 which does state that the mix of development proposed will be achievable as far as is reasonable and viable.</p>

	<p>Housing Policy H1</p> <p>We are concerned that the definition of 'local' for the purposes of identifying housing need in the Kirdford Neighbourhood Plan on page 47 is unreasonable. For instance, local need is proposed to be assessed using the criterion of an individual/at least one adult member of a couple of family unit seeking an affordable dwelling who has either lived or worked (at least 20 hours per week, either paid or unpaid) continuously in the plan area for at least the last 12 months.</p> <p>It would be difficult to prove these requirements and we suggest that the Plan simply refers to housing need as defined in the Chichester District Local Plan or Housing Need Survey. This would be consistent with advice at paragraph 174 of the Framework that it is for local planning authorities to set out requirements for affordable housing in their Local Plan.</p>
	<p>Housing Policy H2</p> <p>Policy H2 sets a threshold of 4 dwellings for the provision of lifetime homes in developments.</p> <p>By setting a limit for lifetime homes ignores the viability implications it will have on developments. In our view any such requirement for lifetime homes is best left for a planning condition to be imposed on a planning permission.</p>
	<p>Policy H4 – Work/Live Units</p> <p>3.12 We are concerned that the definition of a Work/Live Unit in policy H4 is too prescriptive and where they are required to be included in development allocations such as KSS1 have the potential to make the overall allocation unviable or lead to units being left unsold because of lack of market interest. In our view, working from home is already possible in a C3 dwelling and a purpose built work/live unit would not necessarily deliver any additional benefits.</p> <p>King and Chasemore confirm that take up rates of live work units will be affected by mortgage availability as residential mortgages cannot be used and commercial ones usually require a 50-60% deposit and a higher interest rate. There are other financial disincentives such as business rates long term lock in and on sale, potentially capital gains tax being applied to the commercial element. Those that could afford the work/live unit could be expected to require more spacious residential accommodation and there is no flexibility to expand a Unit or exit the unit as easily with commercial leasing arrangements. The letter also comments on the surplus of un-let business units located within a five mile radius of Kirdford arguably better located for passing trade or within established business estates. In our view therefore we are not</p>

	<p>convinced that the inclusion of bespoke work/live units within development allocations is justified. For all these reasons we propose that policy H4 is amended to clarify that Work/Live units as defined are not necessarily suitable for all sites and should not be required to be included in site allocation KSS1 or other residential allocations where working from home would be perfectly acceptable from an ordinary dwelling house.</p>
	<p>Site Specific Policy KSS1 – Land to the North of Kirdford Growers</p> <p>Policy KSS1 refers to the development allocation on land to the north of Kirdford Growers. It includes reference to the football field site as a reserve development site and states a minimum of 45 units will be supported.</p> <p>As indicated in our comments on Proposal 1 (A) there is unnecessary duplication of policy in 1(A) and KSS1. Rather than have 2 policies saying largely the same thing we would suggest including the text of Proposal 1(A) within the main policy KSS1 allowing Proposal 1(A) to be deleted altogether.</p> <p>The text of KSS1 requires amendment in any event. The present wording indicating a minimum of 45 dwellings would not necessarily meet housing need in the Local Plan which currently proposes 60 dwellings and this might increase after the Local Plan Examination. We have suggested that the football field as a reserve site will be dependent on the existing sports pitches being relocated and might not therefore be deliverable in the short term. A better solution therefore would be to increase the overall capacity of the KSS1 site to accommodate up to 60-80 dwellings depending on the level of housing eventually allocated to Kirdford in the Chichester Local Plan. The site can be developed immediately as it is in a single ownership and is large enough to accommodate the full 80 dwellings.</p> <p>To meet the basic conditions, the Neighbourhood Plan has to contribute to the achievement of sustainable development. As noted in paragraph 14 of the NPPF, for plan making the achievement of sustainable development means meeting the objectively assessed needs of an area with sufficient flexibility to adapt to rapid change. However, the housing need has not yet been quantified and will not become clear until the Chichester Local Plan has completed its Examination. In short therefore the Neighbourhood Plan must build in more flexibility to meet future housing need and an increased housing allocation on KSS1 of around 60-80 dwellings would help deliver that flexibility. Similarly, the policy should delete any reference to a 10 year phasing programme as this would delay housing coming forward to meet need in the short term and there is no phasing proposed for Kirdford in the emerging Local Plan. The policy should also be</p>

	amended to clarify that Work/Live units as defined in H4 are not necessarily suitable for all sites and should not be required to be included in site allocation KSS1 where working from home can be carried out perfectly acceptably from an ordinary C3 dwelling house.
	<p>Action Plan</p> <p>As a corollary of our comments on Community Proposal 1(A) and KSS1, the Action Plan (item 5, page 72) should be amended to exclude reference to the football field as a development reserve. The phasing timescale for the development allocation land north of Kirdford Growers on page 78 should also be deleted.</p>
Anthony Brooks	Fully Support the Neighbourhood Plan
Ian Campbell	Fully supports the Neighbourhood Plan and the comprehensive community consultation
Chichester District Council	Policy wording, especially of the housing policies is not strong enough to allow the District Council to determine the applications in the spirit intended.
	There is a risk that policy wording if unchanged could allow development that is unsustainable in this location.
	There is policy that looks to tackle issues beyond the remit of a land use plan.
	A number of the site proposals in section 3 set out varying criteria from the corresponding KSS policies (section 4). There needs to be clarification of the intended role of the proposals section as there are proposals without corresponding policies.
	There is repetition of existing Local Plan Policies.
Environment Agency	<p>We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding.</p> <p>Although Flood Zone 2 runs along the southwest site boundary for 'Proposal 2(B): Develop Lands to the southeast of Townfield as a new Village Social &amp; Recreational Hub,' we are supportive of the approach to locate development within the site, such as the village hall, away from the area of flood risk.</p>
English Heritage	Welcomes the reference to the Conservation Area under "Kirdford village today", but would welcome mention of the listed buildings

	within the parish.
	Welcomes the recognition of the loss of historical characteristics of buildings in the landscape as an issue and the response in Objective 8, particularly 8.1 and 8.6. However, it is not only farm dwellings and buildings that are vulnerable to unsympathetic changes, and we would recommend that this issue be expanded to encompass unsympathetic changes to the wider historic environment of Kirdford.
	Welcome and support the principle of Policy EM.3, although we prefer “conserve” rather than “protect” or “preserve”, which is more consistent with the terminology of the National Planning Policy Framework and recognises that it may be possible for sensitive change to take place without harming the historical significance of an area. Development proposals which preserve/conservate or enhance a heritage asset should not need “clear and convincing justification” (third paragraph of the policy) - it would be better to say “ <i>where this is clearly and convincingly demonstrated by way of an assessment of the significance of an asset or its setting</i> ”.
	Welcomes and support Policy DS.2
	Welcomes 3 under “Community Well Being” on page 72 and 5 under “Other projects to Monitor” but we note that the Conservation Area Management Plan contains recommendations relating to matters other than walls/fences and public areas, which should be recognised under HOW and WHO.
Highways Agency	No comment
Horsham District Council	No comment
Sara Holmes	Fully supports the Neighbourhood Plan and the comprehensive community consultation
Natural England	Landscape - Welcome the recognition of the quality of the landscape within the National Park and its setting, and the associated policies.
	Policy EM.2 - Nature Conservation Sites  We support the policy to conserve and enhance designated or potential special protection areas, designated or candidate areas for conservation, Sites of Special Scientific Interest (SSSI) and nature reserves. Some recognition should be given to the value of undesignated areas and components (stepping stones and corridors) that exist through the countryside, in settlements and on possible development sites. These form an essential part of the broader habitat network which is essential to the wellbeing of

	wildlife and its capacity to move in response to threats such as climate change.
	<p>Page 41 -- Protected Species</p> <p>Commend the recognition that legally protected species (eg Barbastelle bats and other species), use areas far beyond the boundary of the Ebernoe and Mens SACs designated sites, and the need for applications to be conditioned to undertake ecological surveys where habitat is used by key species, and to include appropriate mitigation measures.</p>
	<p>Policy R.5 - Tourist accommodation</p> <p>We welcome the recognition that proposals in a location with heightened environmental sensitivity, including areas prone to seasonal flooding or adjacent to protected habitats, it may be reasonable to secure a management plan by way of condition to make the development acceptable.</p>
	<p>Page 72 - Projects</p> <p>We support projects such as those to provide allotments and community orchards, and to restore ponds and wildlife habitat on land east of Kirdford Growers, and the recognition of the potential of land south of Townfield, for ecological and wildlife habitat benefit.</p>
South Downs National Park Authority	<p>Chapter 3</p> <p>This has sought to combine 4 different types of proposal into a single framework. Some of these have a clear planning intent, e.g. they promote particular sites for development with accompanying schematics to guide delivery. Other proposals have no relationship with town and country planning e.g. the production of a weight restriction map or preparation of a Marketing Strategy.</p> <p>As currently formatted, this would bring the neighbourhood plan into conflict with the legislation which is clear what matters fall within its scope. A further consequence is that the Plan contradicts the statement of compliance in 6.2 of the Basic Conditions Statement. It will be for the Examiner to determine the location of these non planning elements but two potential options seem to be available: either for them to be transposed to the "Action Plan" or a new Appendix. What is important is that the Plan contains a strong distinction between matters relevant to planning and other considerations (which might normally appear in a Parish Plan).</p>
	<p>The status of the Western Weald landscape</p> <p>The Plan makes a couple of references to the West Weald as being an international designation (page 17 and 42). It is not disputed that the landscape quality is high with a historic field</p>

	<p>pattern and extensive areas of open common often unchanged from medieval times. However, it is not designated in its own right. There are two Special Areas of Conservation (SAC) in the Western Weald close to Kirdford which are designated under EU Habitats Directive and seek to establish a European Network of important high quality conservation sites. They enjoy protection under EU and UK Law.</p> <p>The Western Weald Landscape Project considers the whole landscape of the Western Weald to be of international significance in addition to the existing designations identified above (and other local and national designations such as SSSIs and SNCIs), however this has not yet been addressed through any designation process.</p> <p>The Western Weald is part of the Low Weald, one of 159 distinct natural areas, which have been identified originally by the Countryside Commission and English Nature. The Character Area descriptions sets out the unique features and characteristics of this landscape type and can be found at:  <a href="http://www.naturalengland.org.uk/publications/nca/low_weald.aspx">http://www.naturalengland.org.uk/publications/nca/low_weald.aspx</a></p> <p>Within the Low Weald, the West Weald Partnership Project is seeking to co-ordinate management of habitats, enhance opportunities for wildlife for better connectivity and increase enjoyment, understanding and appreciation of the area. It would be worth signposting the project as a delivery mechanism in Chapter 6.</p>
	<p>Housing delivery</p> <p>The Chichester District Council (CDC) Draft Local Plan Key Policies – Preferred Approach (March 2013) identifies a “Plan Area (North)” - a cluster of parishes including (parts of) Northchapel, Ebernoe, Petworth, Wisborough Green, Plaistow and the whole of Loxwood. Within this area, “no strategic allocations are planned and housing provision will be limited to parish housing sites, windfall allowance and existing planning permissions”. The CDC Plan proposes that sites suitable for small scale housing will be identified at the parish level for a plan period up to 2029. Indicative housing numbers are set out for 5 of the aforementioned parishes of which Kirdford’s contribution is 60 dwellings.</p> <p>Para. 7.14 notes that “minor amendments” to housing numbers will be allowed where detailed investigation and assessment of individual sites has been undertaken through the evidence gathering for a neighbourhood plan.</p> <p>The Kirdford Neighbourhood Plan seeks to deliver a range of 62-76 units over the Plan Period (2013-2028). The Plan observes that the local sewerage capacity could limit the delivery above 70 units. The higher end of the range could also affect the ability of the Parish to plan for sustainable development considered integral to the successful delivery of the Plan’s strategy. Rather than promoting</p>

	<p>land solely for housing, the Parish Council has investigated opportunities for sites to contribute to other local needs, such as employment space/premises and new and enhanced facilities and services which can improve the quality of place. A strategy reliant entirely on housing, without consideration of other land uses, would be at the risk of ever greater dependence on outward commuting.</p> <p>Sustainability, and perhaps more precisely self-reliance, is a thread that runs convincingly and consistently throughout the Plan. It is clear that the loss of village services and facilities has already put at threat the social cohesion and ‘togetherness’ which is such a vital component and valued aspect of village life. The particular isolation of Kirdford village and its obvious ability to act, within the Parish cluster, as a service point for other parishes (some of which are in the South Downs) heightens the need to give special consideration to the provision of local services and facilities. The ambition for sustainable development is supported.</p> <p>The intention to deliver 53-65 units taking account of the need to enhance local infrastructure, supported by the site assessment work, appears to be reasonable approach and one that accords with emerging policy in the CDC Local Plan. As already noted, SDNPA has not analysed the site allocations in any detail but broadly, the neighbourhood plan has identified how the housing target in the Local Plan can be achieved. The Parish Council acknowledge in the supporting text that there may still be the potential to achieve a higher number of dwellings should be sewerage issues be resolved.</p> <p>The commitment to review the Plan, at least every 5 years, and an apparent commitment to continued joint working with other parishes in the “Plan Area (North)” provides assurance that the overall target for Plan Area (North) of 200 dwellings (a further 139 is to be supplied from windfalls and existing planning permissions) can be delivered. The Plan also accords with the Local Plan’s emphasis “upon maintaining the rural character of the existing villages, whilst enabling the local communities to become more self-reliant in meeting their local needs”.</p>
	<p>The Plan’s treatment of the SDNP</p> <p>All of the general development management policies have been reviewed. They provide a robust basis for decision making, subject to further minor modifications, and their intent and justification has generally been well explored. While the majority of the Parish sits outside the National Park, the Plan has been sufficiently ambitious to consider the needs of a wider sub-area (the cluster of parishes in NE Chichester District). Some of these are partly in the National Park. This has led to discussion of how infrastructure may be delivered to the common benefit to the parishes within the cluster. New facilities and services in Kirdford could potentially address</p>



	<p>shortfalls in provision over this wider area. As there is not a formal “Duty to Cooperate” for neighbourhood plans, this initiative seems particularly innovative and makes good sense where all the participants are engaged simultaneously in a community planning exercise (the Basic Conditions Statement Reports they are).</p> <p>This willingness to look outside the Parish boundary has also been evident in the evolution of the sustainable tourism policy. The Plan seeks to capitalise on the Parish’s position on the northern edge of the National Park by supporting appropriate expansion of the local tourist infrastructure.</p> <p>The policy is welcome and well conceived, drawing on the Defra Vision and Circular for its inspiration.</p> <p>It is particularly welcome that the Plan includes two ‘umbrella’ policies to deal with development proposals in the part of the neighbourhood plan area within the SDNP and which may affect its setting. There is important acknowledgement of the National Park Purposes and Duty (from the Environment Act 1995), the South Downs Integrated Landscape Character Assessment and issues which may potentially impinge on the Park’s special qualities if not successfully managed. As it is expected that all other policies in the Plan must be read in conjunction with SDNP.1 &amp; SDNP.2, this policy support will ensure the Neighbourhood Plan aligns with the objectives of the South Downs National Park Management Plan (as drafted). SDNPA does not currently have an up-to-date development plan for the National Park in Chichester District. The inclusion of these policies addresses the distinct planning considerations which apply to one part of the Parish and are in line with national planning policy.</p>
	<p>The proportionality of policies</p> <p>A number of policies appear to impose a disproportionate burden on developers by seeking to apply their criteria to all development. While there may be simplicity from taking such a ‘blanket’ approach, it is likely to result in developers being asked to produce material to support their planning applications that has little value. Policy EM.1, for example states that “all new developments will need to demonstrate they have a surface water management plan”: this is not likely to be necessary for householder applications. Para. 21 of the National Planning Policy Framework (NPPF) is clear that businesses should not be over-burdened by the “combined requirements of planning policy expectations”. The issue of proportionality recurs in Policy CP.1 which states that “any planning application for new development within the Plan Area must demonstrate how they can contribute towards the delivery of community development”. It is, however, recognised that in this instance reference has guidance set out in the NPPF relating to the use of planning conditions and obligations. Policy E.2 similarly requires a “Connectivity Statement” to be provided to support all planning applications.</p>

	<p>The treatment of nature conservation designations</p> <p>Policy EM.2 raises concern in that it elevates all nature conservation sites to the same level of protection. This is contrary to guidance set out in the NPPF in para. 113 which states “Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”. The Chichester District Council Draft Local Plan Key Policies document (March 2013) provides flexibility in “exceptions...where no reasonable alternatives are available and the benefits of development clearly outweigh the negative impacts” (para. 19.56). Such flexibility would normally apply to local designated assets, while development with potential to significantly affect a Special Area of Conservation, such as The Mens, (an international designation) would require special scrutiny and require a detailed “appropriate assessment”. In this circumstance, the proposal must be refused unless the assessment concludes there would be no adverse effect on the integrity of the SAC. EM.2’s approach is also at odds with the Policy EM.3 dealing with heritage assets, whereby they will be given “the requisite level of protection”.</p>
	<p>The use of local occupancy conditions</p> <p>While this Policy H.1 may be controversial in that it embodies a relatively untested approach to market housing (outside of National Parks), justification points to the difficulty members of the local community have in accessing housing. The policy appears to be focussed on affordable housing and 1 and 2 bedroom market housing which would normally be considered to be at the more affordable end of the housing spectrum. However, it should be clearer whether other property types i.e. 3+ bedrooms should be exempt: they potentially should be on any allocated sites. It is acknowledged the policy does not seek to apply the condition to all housing in schemes of 2+ units within the settlement policy area, rather this would be applied to a “proportion”. The risk of properties staying vacant is minimised by the requirement for “up-to-date evidence of need” as well as a consideration of viability. The intent behind this policy is supported.</p>
	<p>The mix of housing being delivered</p> <p>Policy H.2 could depress the numbers of social rented properties which may be delivered in the settlement policy area by prioritising the delivery of housing for older people. Affordable housing would normally need to be delivered in accordance with the criteria set out in the Local Plan.</p> <p>Affordable housing, of which there is a great need in the Chichester District, can provide vital relief for households, including older persons, responding to</p>

	<p>considerable personal hardship; cases of homelessness, overcrowding, housing exacerbating an existing illness and health and safety hazards are examples of circumstances prioritised through the Housing Authority's Allocation Scheme.</p> <p>On balance, it is considered an emphasis on general housing for a particular cohort of the population would have a detrimental effect since it would disadvantage those most in need. The policy is undesirable in that it would override the prioritisation of households who may require housing more urgently than older persons in less need. It should be noted that the direction of travel in the Chichester Local Plan is towards a situation where all residential development sites make an affordable housing contribution (Policy 35 of the Preferred Approach – March 2013). The Defra Vision and Circular also highlights that in National Parks there should be a particular emphasis on the delivery of affordable homes.</p> <p>There are also concerns about the equity of positively discriminating against other population groups, such as young people, who themselves may be in housing need, for a type of housing normally available to anyone. There is also the unanswered question of what happens if there is only one member of the household over the State Retirement Age and they pass away or move into a retirement home. Does the property then remain for a potentially long period of time not occupied by older people? The policy could potentially neutralise the impact of CDC widening the scope of affordable housing requirements on development in their Plan area.</p> <p>It is considered that there may be other means by which the intent of the policy could be explored without forfeiting needed affordable homes. The imposition of a Lifetime Homes standard across the Plan Area would increase the number of properties suitable for occupation by older persons.</p> <p>Lifetime Homes support the changing needs of individuals and families at different stages of life. The promotion of smaller properties, which the Plan already provides, will help deliver more properties which are affordable for both younger and older people – this would have the effect of freeing up larger homes. Lastly, the new Allocation Scheme for Chichester District gives prioritisation to people living in Registered Provider accommodation who are under-occupying family-sized accommodation by 2 bedrooms or more (through placing them in the highest priority band) –over time, releasing family homes.</p> <p>The policy should also make reference to the Coastal West Sussex Strategic Housing Market Assessment (March 2012) which provides an up-to-date estimate of the need for different housing types.</p>
	Major developments in National Parks

	<p>DS.1 introduces the issues surrounding windfall development. It would be helpful if this section briefly referenced para. 116 of the National Planning Policy Framework which states that planning permission for major developments in National Parks would normally be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest.</p>
	<p>Mapping of Local Green Spaces</p> <p>This should be added to the document for clarity.</p>
	<p>Acceleration of timetable to meet the Code for Sustainable Homes</p> <p>The intent of the policy is supported providing this does not lead to unacceptable impacts on the setting of development. It is not clear why this approach is restricted to the settlement policy area.</p>
	<p>Appreciation of the National Park's special qualities</p> <p>Policies R3 and R4 are supported however reference should be made to the positive benefits PROWs, walking and cycle routes provide in allowing residents and visitors to enjoy the special qualities of the National Park. This supports Park Purpose 2 and needs to be considered in addition to issues surrounding safety and impacts on residential amenity. The PROWs contribute to the area's historical characteristics and landscape quality and their role and function may be compromised by poorly conceived development schemes.</p>
	<p>Renewable energy</p> <p>Policy E.1 should include reference in the criteria to the potential negative impact transmission lines may have in connecting to renewable energy plant. It is vital that the impacts of such infrastructure are sensitively managed within the National Park, for instance through the undergrounding of cables where not in an archaeologically sensitive area.</p>
Southern Water	<p>Ofwat takes the view that local infrastructure, such as local sewers and water mains, should be funded by the development if this is specifically required to service individual development sites. To this end, the principle is that new development needs to connect to the sewerage and water distribution systems at the nearest points of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the site. Southern Water would take future income from customers into account, so that the developer would only need to fund a proportion of the total cost.</p>
	<p>We note that on page 33 of the plan, the capacity of the wastewater treatment works is cited as a constraint and limits the provision of housing over the plan period to 53-65 units rather than 62-76 units. However, we reiterate our response of 5<sup>th</sup> June 2013 to Kirdford Parish Council that the capacity of the current environmental permit at Kirdford wastewater treatment works</p>

	<p>should not be seen as a constraint to development. Southern Water could apply to the Environment Agency, as a matter of standard procedure, for a new or amended permit to accommodate further new development. We are not aware of any environmental constraints that would prevent this approach. Unless environmental constraints have been identified by the Environment Agency, we request that the reference to constraints at Kirdford wastewater treatment works is removed from the Neighbourhood Plan.</p>
	<p>We note that on page 33 of the plan, the capacity of the wastewater treatment works is cited as a constraint and limits the provision of housing over the plan period to 53-65 units rather than 62-76 units. However, we reiterate our response of 5<sup>th</sup> June 2013 to Kirdford Parish Council that the capacity of the current environmental permit at Kirdford wastewater treatment works should not be seen as a constraint to development. Southern Water could apply to the Environment Agency, as a matter of standard procedure, for a new or amended permit to accommodate further new development. We are not aware of any environmental constraints that would prevent this approach. Unless environmental constraints have been identified by the Environment Agency, we request that the reference to constraints at Kirdford wastewater treatment works is removed from the Neighbourhood Plan.</p>
	<p>Investment would be required at the works if the Environment Agency sets stricter treatment standards to meet water quality objectives. This investment can be planned, funded and delivered in parallel with development through the water industry's five yearly price review process as outlined above. We look to planning policies to co-ordinate development with the provision of infrastructure, and not permit development to proceed unless it connects to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water. Such policies would facilitate sound planning decisions in the event, for example, development comes forward sooner than anticipated, capacity is insufficient and investment is not programmed by Southern Water.</p>