

WHITCHURCH NEIGHBOURHOOD PLAN
2020 - 2040

MARCH 2022

BASIC CONDITIONS STATEMENT

Published by Whitchurch Parish Council under the Neighbourhood Planning (General) Regulations 2012
(as amended)

CONTENTS

1. INTRODUCTION	3
2. BACKGROUND	6
3. CONDITION (A): REGARD TO NATIONAL PLANNING POLICY	7
4. CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT	9
5. CONDITION (E): GENERAL CONFORMITY WITH THE DEVELOPMENT PLAN	12
6. CONDITION (F): COMPATABILITY WITH EU LEGISLATIONS	14

1.INTRODUCTION

1.1 This statement has been prepared by Whitchurch Parish Council ("the Parish Council") to accompany its submission of the Whitchurch Neighbourhood Plan ("the Neighbourhood Plan") to the local planning authority, Buckinghamshire Council ("Bucks Council"), under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ("the Regulations").

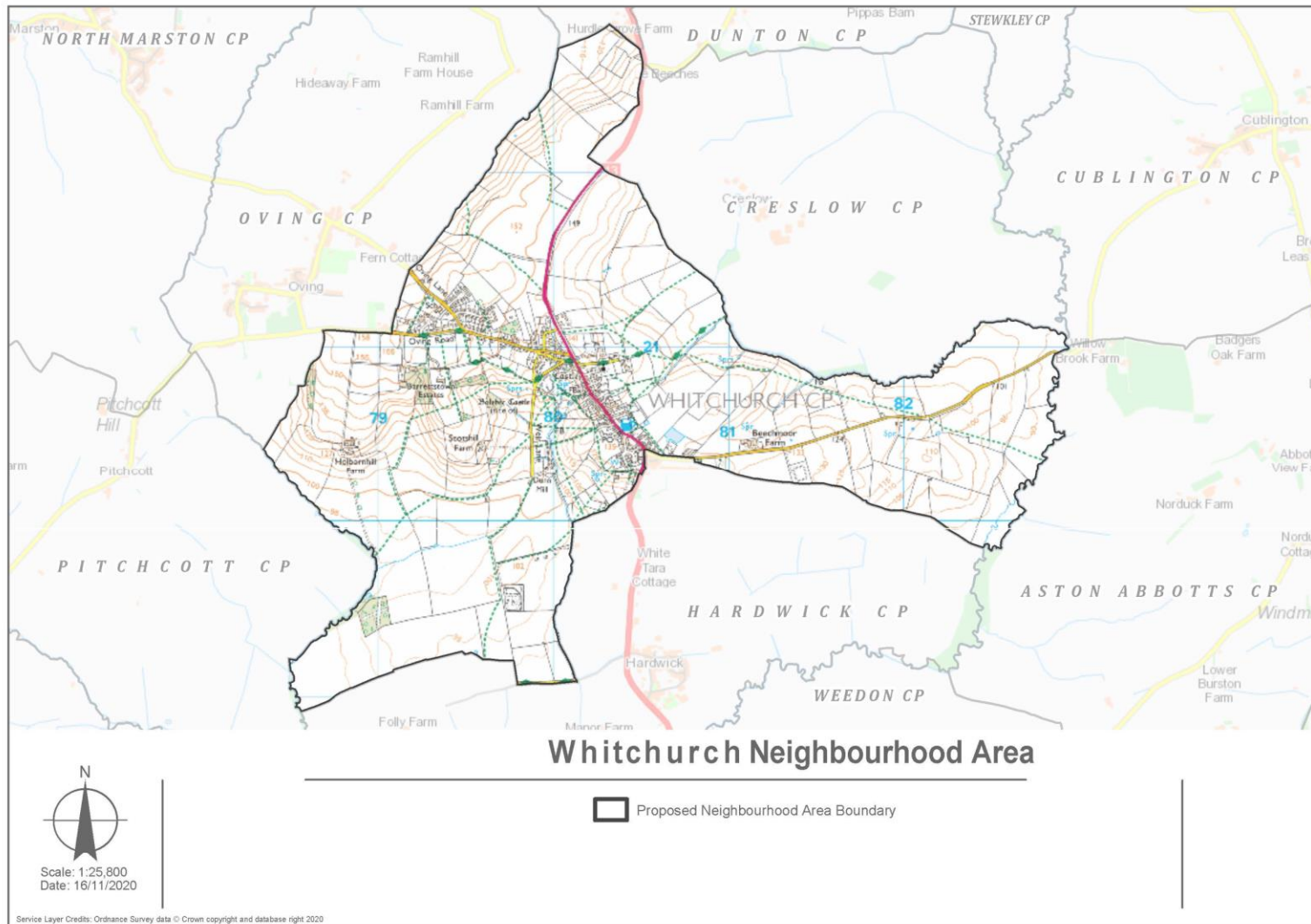
1.2 The Neighbourhood Plan has been prepared by the Whitchurch Parish Council, the 'Qualifying Body', for the Neighbourhood Area ("the Area"), which coincides with the boundary of the Parish of Whitchurch as shown on Plan A below. Bucks Council designated the Neighbourhood Area in November 2020.

1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Area. They do not relate to 'excluded development', as defined by the Regulations. The plan period of the Neighbourhood Plan is from 2020 - 2040, which corresponds with the plan period of the emerging Buckinghamshire Local Plan ("the Local Plan").

1.4 The statement addresses each of the four 'Basic Conditions', which are relevant to this plan, required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the Conditions if:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan,
- b) (Not relevant for this Neighbourhood Plan),
- c) (Not relevant for this Neighbourhood Plan),
- d) The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development,
- e) The making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f) The making of the Neighbourhood Development Plan does not breach and is otherwise compatible with EU obligations.



Plan A: Whitchurch Designated Neighbourhood Area

1.6 The responsibility for determining if a Neighbourhood Plan has had regard to national policy and is in general conformity with strategic policy rests with a combination of the qualifying body, the local planning authority and the independent examiner (Planning Practice Guidance §41-070 and §410-074). Case law, established in the Tattenhall Neighbourhood Plan in 2014 (see §82 of EWHC 1470) but endorsed by the Courts on a number of occasions since, makes clear that:

“... the only statutory requirement imposed by Condition (e) is that the Neighbourhood Plan as a whole should be in general conformity with the adopted Development Plan as a whole ... any tension between one policy in the Neighbourhood Plan and one element of the ... Local Plan (is) not a matter for the Examiner to determine.”

1.7 The case acknowledged that there will often be tensions between different strategic policies when considered against the non-strategic policies of a specific local area covered by a Neighbourhood Plan. It concluded that such tensions can only be resolved by the qualifying body using its planning judgement to strike an appropriate balance across the plan as a whole. The examination tests the extent to which the qualifying body as exercised its judgement in a reasonable way.

2.BACKGROUND

2.1 The decision to proceed with a Neighbourhood Plan was made by the Parish Council in 2016. The key driver of this decision was a sense of wanting to plan positively for the future of the Parish, with the encouragement of the Bucks Council to local communities to prepare Neighbourhood Plans. It was considered the Neighbourhood Plan presented an opportunity to shape how the Parish should evolve in the coming years at a time of strategic policy uncertainty.

2.2 A steering group was formed comprising the residents and Parish Council representatives. The group has been delegated authority by the Parish Council to make day-to-day decisions on the preparation of the Neighbourhood Plan. However, as the qualifying body, the Parish Council approved the publication of the Pre-Submission plan in December 2022 and the Submission Plan now.

2.3 The Parish Council has consulted the local community extensively over the duration of the project. It has also sought to work closely with officers of the Bucks Council to collate and examine the evidence base, to design and iterate policy proposals and to define the proper relationship between the Neighbourhood Plan and the Local Plan. The Parish Council has considered the representations made on the Pre-Submission Plan and has made some modifications to its submitted version with the hope that they will have resolved the small number of objections and concerns raised.

2.5 The Neighbourhood Plan contains 10 land use policies (W1 – W10), which are defined on the Policies Map where they apply to a specific part of the Area. The Plan has deliberately avoided containing policies that duplicate saved or forthcoming development plan policies or national policies that are already or will be used to determine planning applications. The policies are therefore covering development management matters that seek to refine and/or update existing policies.

3. CONDITION (A): REGARD TO NATIONAL PLANNING POLICY

3.1 The Neighbourhood Plan has been prepared with full regard to national policies as set out in the National Planning Policy Framework (NPPF) and is mindful of the Planning Practice Guidance (PPG) in respect of formulating Neighbourhood Plans, as set out in Table A. In overall terms, there are four NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

General Paragraphs

3.2 The Parish Council believes the Neighbourhood Plan "support(s) the delivery of strategic policies contained in (the) local plan ... and ... shape(s) and direct(s) development that is outside of these strategic policies" (§13). It considers the Neighbourhood Plan contains only non-strategic policy proposals or proposals that refine strategic policy to fit the circumstances of the Area without undermining the purpose and intent of those strategic policies (§18). It considers that the Neighbourhood Plan sets out more "detailed policies for specific areas" including "the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies" (§28).

3.3 The Parish Council considers that its Neighbourhood Plan has provided its communities the power to develop a shared vision for the Area that will shape, direct and help to deliver sustainable development, albeit in a modest way, by influencing local planning decisions as part of the statutory development plan.

Specific Paragraphs

3.4 Each policy engages one or more specific paragraphs of the NPPF. Those that are considered to be of the most relevance and substance are identified in Table A below.

Table A: Neighbourhood Plan & NPPF Conformity Summary			
No.	Policy Title	NPPF Ref.	Commentary
W1	Settlement Boundary	16	The policy distinguishes between the built-up area of Whitchurch and the surrounding countryside so it is evident how a decision maker should react

			<p>to development proposals as per §16. This approach to settlement boundaries is set out and supported by the VALP. Although the convention is not provided for in the strategic policies of the development plan (§21), Bucks Council has accepted that it is consistent with its approach to development management.</p> <p>The definition of the boundaries on the Policies Map has principally been derived from the definition of the existing developed footprint defined by strategic policy (VALP Policy D3). The boundary has included new developments which have been recently completed, are underway or have planning permission, includes land that has been proposed for the allocation of housing in Policies W2 and W3 below, and allows for the continuing growth of the village through suitable infill sites, which may deliver another 3-10 homes in the plan period. As a 'larger village' in the settlement hierarchy, and no marked difference in the provision of services which led to that conclusion, the village is presented as a sustainable location for development.</p>
W2	Housing Allocation – Land at Kempson House West	14, 62, 69, 70, 174, 179, 194	<p>The policy allocates land for a scheme of approximately 23 dwellings, for a comprehensive residential development. The policy will deliver a number of homes exceeding the housing requirement set out in the VALP and together with the reserve site in Policy W3 plans for a potential eventuality that the new Buckinghamshire Local Plan may require additional homes for the period beyond that. Given the early stages of the new Buckinghamshire Local Plan it has not been possible to establish any meaningful requirement figure for the neighbourhood area, as per §66, nor has the area been designated at a late stage in the strategic policy-making process to establish any meaningful indicative requirement figure for the neighbourhood area, as per §67 and footnote 33. As a 'larger village' in the settlement hierarchy (VALP Policy S3), and no marked difference in the provision of services which led to that conclusion, the village is presented as a sustainable location for development.</p> <p>The site is regarded as a small to medium sized site delivering approximately 23 new homes which will make an important contribution</p>

		<p>to the area (§69, §70). The landowner has continued to engage in the process and has confirmed that the site is deliverable, thus contributing to local housing delivery.</p> <p>The 'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' (§62). The evidence gathered during the preparation of the Plan indicates a need for smaller homes and the policy therefore makes provision for this.</p> <p>The policy makes provision for net gains for biodiversity (§174d) and 'safeguards components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity...' (§179a).</p> <p>The policy seeks to ensure that 'opportunities to promote walking, cycling and public transport use are identified and pursued' (§104c).</p> <p>In respect of protecting and enhancing valued landscapes, the site lies within an Area of Attractive Landscape and the community has accepted that there will inevitably be a change in character, but for this site it has been demonstrated that this change is likely to be very localised on the landscape itself and policy provisions will ensure any localised harm is minimised (§174).</p> <p>In heritage terms, the site lies adjacent to the Conservation Area and the Grade II listed Kempson House. There are also listed buildings to west of the High Street nearby. The policy provisions ought to ensure that proposals avoid harm to those heritage assets (§194).</p> <p>In summary, the policy includes a number of mitigating requirements in accordance with these NPPF measures. The allocation of the site seeks to balance the objective of protecting and enhancing valued landscapes with that of delivering new open market and affordable homes in Whitchurch.</p> <p>By demonstrating that the site can deliver a suitable scheme it is</p>
--	--	---

			considered that, on balance, this allocation, with its specific mitigation measures set out as requirements has had proper regard to the NPPF as a whole and will deliver sustainable development.
W3	Reserve Site – Land at Manor Farm North	14, 62, 69, 70, 174, 179, 194	<p>The policy reserves land for a scheme approximately of 35 dwellings, for a comprehensive residential development. The policy will deliver a number of homes exceeding the housing requirement set out in the VALP and together with the allocation in Policy W2 plans for a potential eventuality that the new Buckinghamshire Local Plan may require additional homes for the period beyond that. Given the early stages of the new Buckinghamshire Local Plan it has not been possible to establish any meaningful requirement figure for the neighbourhood area, as per §66, nor has the area been designated at a late stage in the strategic policy-making process to establish any meaningful indicative requirement figure for the neighbourhood area, as per §67 and footnote 33. The policy therefore makes provision for the site to come forward in the event that the housing policies are out of date, as per footnote 33, or the housing supply policies of the new Buckinghamshire Local Plan require the provision of new homes after the Neighbourhood Plan is made ensuring a plan-led approach for Whitchurch. As a 'larger village' in the settlement hierarchy (VALP Policy S3), and no marked difference in the provision of services which led to that conclusion, the village is presented as a sustainable location for development.</p> <p>The site is regarded as a small to medium sized site delivering approximately 23 new homes which will make an important contribution to the area (§69, §70) in the latter part of the plan period, or earlier if required. The landowner has continued to engage in the process and has confirmed that the site is deliverable in this way, thus securing local housing delivery throughout the plan period.</p> <p>The 'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' (§62). The evidence gathered during the preparation of the Plan indicates a need for smaller homes and the policy therefore makes provision for this.</p>

			<p>The policy makes provision for net gains for biodiversity (§174d) and 'safeguards components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity...' (§179a).</p> <p>The policy seeks to ensure that 'opportunities to promote walking, cycling and public transport use are identified and pursued' (§104c).</p> <p>In respect of protecting and enhancing valued landscapes, the site lies within an Area of Attractive Landscape and the community has accepted that there will inevitably be a change in character, but for this site it has been demonstrated that this change can be accommodated and will eventually form part of the landscape appropriately and policy provisions will ensure this is the case (§174).</p> <p>In heritage terms, the site lies adjacent to the Conservation Area. The policy provisions ought to ensure that proposals avoid harm to heritage assets (§194).</p> <p>In summary, the policy includes a number of mitigating requirements in accordance with these NPPF measures. The allocation of the site seeks to balance the objective of protecting and enhancing valued landscapes with that of delivering new open market and affordable homes in Whitchurch.</p> <p>By demonstrating that the site can deliver a suitable scheme in due course it is considered that, on balance, this allocation, with its specific mitigation measures set out as requirements has had proper regard to the NPPF as a whole and will deliver sustainable development.</p>
W4	Design Codes	127, 128, 190	Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development' (§127). The policies seek to bring 'clarity about design expectations' within the villages of Whitchurch the wider Parish (§128). The specific matters included in the policies 'provide a framework for creating distinctive places' to deliver a 'consistent and high quality

			standard of design'. Given the conservation area, the code also incorporates character assessment and design guidance covering the historic environment (§190).
W5	Managing Traffic	104	The policy requires that transport issues are considered from the earliest stages of development proposals so that opportunities to promote walking, cycling and public transport use are identified and pursued (§104).
W6	Essential Commercial, Business and Service Uses	79	This policy seeks to promote the retention of the identified essential facilities and businesses to maintain the vitality of the village in accordance with §79.
W7	Local Community Uses and Pubs	93	This policy seeks to protect valued local community facilities in accordance with §93.
W8	Local Green Spaces	102	This policy designates Local Green Spaces having taken into the criteria in §102. The owners of the land proposed for designation have been notified of this intention and given the opportunity to make representations in line with the advice set out in the Planning Practice Guidance. The policy does not unduly constrain the delivery of new development, as the settlement boundary Policy W1 have made provision for new and infill development of a scale that is in line with strategic policy. All of the spaces identified is considered are capable of enduring beyond the plan period.
W9	Important Views	174	The Parish does not lie within a designated landscape, but as shown in the Whitchurch Design Guidance and Codes, there are some demonstrable physical attributes within the surrounding landscape that are special in framing views from and to the settlement that are above the norm in defining its rural character and forms part of the value of the identified Area of Attractive Landscape. In recognising the local status of the policy, it does not seek to prevent any development as a matter of principle, but rather requires development proposals to avoid unnecessary harm by way of their height, massing or obstructive location.

W10	Green Infrastructure	153, 174, 179	The policy alerts applicants to the presence of green infrastructure as one means of ensuring the future resilience to climate change impacts and to support nature recovery (§153 and §174).
-----	----------------------	------------------	---

3.5 It is considered that all of the policies have had full regard to national policy. In some policy instances, the community have been required to strike a balance between competing policy objectives by weighing their likely positive and adverse effects. In each case, the table above indicates how that balancing exercise has been made for the benefit of the examiner and Bucks Council to consider during the examination. As a result, the Neighbourhood Plan, as a whole, is considered to meet Condition (a).

4. CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT

4.1 Given the intended scope of the Neighbourhood Plan, the Parish and Bucks Councils agreed that a Strategic Environmental Assessment (SEA) would be necessary early on in the project, and this was confirmed by the statutory consultees. The Parish Council proceeded to appoint AECOM to prepare first a scoping report for an SEA in January 2022 for consultation with the statutory bodies and then draft and final SA/SEA reports during the Pre-Submission stage (October 2022 and November 2023) and Submission stage.

4.2 The separate SA/SEA Report sets out the sustainability effects of the policies of the Neighbourhood Plan. The Report concludes:

“10.1 Overall, no significant negative effects are considered likely in the implementation of the WNP. Significant positive effects are anticipated in relation to the population and communities theme, predominantly reflecting the potential provision of high-quality and accessible housing of a range of tenures, connected to the existing settlement area.

10.2 Minor negative effects are predicted as likely in relation to the SEA themes of air quality, land, soil, and water resources, and landscape. This predominantly reflects greenfield development, potentially resulting in the loss of high quality agricultural land, and likely minor increases in traffic in and nearby the Aylesbury AQMAs.

10.3 Minor positive effects are concluded as most likely in relation to the SEA themes of biodiversity, climate change and flood risk, historic environment, and transportation and movement. The allocation and reserve sites are not significantly constrained in relation to biodiversity and flood risk. Whilst there are heritage constraints, the provisions of the WNP seek to ensure no residual impacts in relation to the significance of assets or their settings. Additional policy provisions which identify positive characteristics which contribute to heritage settings, design codes, important local views, and traffic mitigation measures at key locations are notable benefits of the plan.

10.4 Neutral effects are concluded as most likely in relation the health and wellbeing SEA theme, with no significant deviations from the baseline predicted”.

5. CONDITION (E): GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

5.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the development plan for the plan area, that is the Vale of Aylesbury Local Plan (VALP) and the Buckinghamshire Minerals and Waste Local Plan (MWLP). Whilst there are Minerals Safeguarding Areas in and adjacent to the parish, given its distance from the main village settlement, it is not considered that the provisions of the MWLP are relevant in this Neighbourhood Plan. An emerging Joint Local Plan for Buckinghamshire to 2040 (covering the former districts of Aylesbury Vale, Chiltern, South Bucks and Wycombe) is at early stages of preparation. In accordance with Planning Practice Guidance (§ 41-009), this Statement does not seek to demonstrate general conformity with the policies of the emerging Local Plan, which in any event is too early in its preparation to be of any help.

5.2 The adopted VALP defines Whitchurch as a 'larger village' in the settlement hierarchy of the district where the village housing requirement of 130 homes will be met by completion and commitments (which includes the VALP allocation of 22 new homes at Newman Close). Beyond them the VALP makes clear that development in the countryside should be avoided. As a 'larger village' in the settlement hierarchy, and no marked difference in the provision of services which led to that conclusion, the Parish Council has concluded that in strategic policy terms, the village is presented as a sustainable location for development and seeks to ensure that development coming forward remains plan-led.

5.3 The assessment of the general conformity of each policy with the strategic policies of the development plan is contained in Table B below. Paragraph 1.24 of the VALP states:

“All policies in Chapter 3 (Strategic) and Chapter 4 (Strategic Delivery) are strategic policies, alongside Policy H1 (Affordable Housing), H6a (Housing Mix), H6b (Housing for older people), H6c (Accessibility), E1 (Protection of Key Employment Sites), E5 (Development outside town centres) E10 (Silverstone Circuit), T1 (Delivering the Sustainable Transport Vision) and T2 (Supporting and Protecting Transport Schemes), BE1 (Heritage Assets), NE1 (Biodiversity and Geodiversity), NE3 (The Chilterns AONB and its setting), NE4 (Landscape character and locally important landscape), C3 (Renewable Energy), I1 (Green Infrastructure), I4 (Flooding) and I5 (Water Resources).”

Table B: Neighbourhood Plan & Development Plan Conformity Summary		
No.	Policy Title & Refs	Commentary
W1	Settlement Boundary	This policy is in line with VALP Policy D3 by identifying a settlement boundary derived from the

		<p>'existing development footprint' of the Whitchurch village to ensure that applicants, the local community and Bucks Council are all clear on when settlement or countryside policies should apply to development proposals. The policy is also consistent with the current spatial policy (S2 and S3) for 'larger villages' as a sustainable location for development.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W2	Housing Allocation – Land at Kempson House West	<p>The scheme will make a contribution to meeting housing needs in the Buckinghamshire plan area (S2). In including the policy, the Parish Council demonstrates their commitment to planning for positive growth in the Parish (S3) whilst recognising the Bucks Council's conclusion that larger scale development would not be consistent with the adopted Local Plan unless monitoring of housing delivery across Aylesbury Vale shows that the allocated sites are not being delivered at the anticipated rate (D3). The policy also recognises the importance of conservation and enhancement opportunities for Areas of Attractive Landscape set out in Policy NE4. The community has accepted that there will inevitably be a change in character, but for this site it has been demonstrated that this change is likely to be very localised on the landscape itself and policy provisions will ensure any localised harm is minimised. In accordance with Policy BE1 on heritage assets the policy provisions will ensure that any scheme conserves heritage assets in a manner appropriate to their significance, including their setting.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W3	Reserve Site – Land at Manor Farm North	<p>The scheme will make a contribution to meeting housing needs in the Buckinghamshire plan area (S2). In including the policy, the Parish Council demonstrates their commitment to planning for positive growth in the Parish (S3) whilst recognising the Bucks Council's conclusion that larger scale development would not be consistent with the adopted Local Plan unless monitoring of housing delivery across Aylesbury Vale shows that the allocated sites are not being delivered at the anticipated rate or the new Buckinghamshire Local Plan requires the provision of new homes in the Parish (D3). The policy also recognises the importance of conservation and enhancement opportunities for Areas of Attractive Landscape set out in Policy NE4. The community has accepted that there will inevitably be a change in character, but for this site it has been demonstrated that this change can be accommodated and will eventually form part of the landscape appropriately and policy provisions will ensure this is the case. In accordance with Policy BE1 on heritage assets the policy provisions will ensure that any scheme conserves heritage</p>

		<p>assets in a manner appropriate to their significance, including their setting.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W4	Design Codes	<p>The policy refines VALP Policies BE1 and BE2 by identifying local context and specific design features of the Whitchurch village and the wider Parish.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W5	Managing Traffic	<p>The policy refines VALP Policy T1 by encouraging safe, accessible, and convenient means of movement and traffic through the Parish.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W6	Essential Commercial, Business and Service Uses	<p>This policy is in accordance with VALP Policy D7 in protecting essential facilities and business in the village.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W7	Local Community Uses and Pubs	<p>This policy refines VALP Policies D7 and I3 in defining those existing community facilities in the Parish to which the policy applies.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W8	Local Green Spaces	<p>This policy seeks to designate Local Green Spaces in accordance with VALP Policy W8.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>
W9	Important Views	<p>This policy seeks to protect distinctive and valued aspects of the local landscape in the Parish in line with VALP Policy NE4.</p>

		As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.
W10	Green Infrastructure	<p>This policy alerts applicants to the presence of green infrastructure assets in the Parish in accordance with VALP Policy 11.</p> <p>As a result, the Parish Council considers the policy is in general conformity with the development plan as a whole.</p>

6. CONDITION (F): COMPATABILITY WITH EU-DERIVED UK LEGISLATION

6.1 As set out in Section 4 the Parish Council has met its obligations to the Regulations in respect of assessing the potential for significant environmental effects of the policies of the Neighbourhood Plan. The Final SEA Report is published as a separate document for submission and examination.

6.3 The Parish Council has also met its obligations in relation to the habitats provisions of the Conservation of Habitats and Species Regulations 2017 (as amended)). In this regard, the Parish Council provided the Bucks Council with all the necessary information it requires for the purposes of determining whether an Appropriate Assessment is required.

6.4 The Parish Council has been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in process of preparing the Neighbourhood Plan and considers that it complies with the Human Rights Act. The Neighbourhood Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.

6.5 In respect of Directive 2008/98/EC – the Waste Framework Directive – the Neighbourhood Plan does not include any policies in relation to the management of waste, nor does the area include a waste management site. On that basis, this Directive is not considered relevant to the Neighbourhood Plan and therefore could not be breached.

6.6 In respect of Directive 2008/50/EC – the Air Quality Directive – the Neighbourhood Plan includes some policies relevant to Air Quality. These policies are tested in accordance with national policy and guidance relevant to their content. The policies are not considered to breach the requirements of the Air Quality Directive as they comprise small-scale interventions and do not negate from the framework for measurement and improvement of air quality set in the Directive.