

## SDNPA response to the pre-submission Amberley Neighbourhood Plan

Ref	Comment	SDNPA Recommendation to Amberley Parish Council
<b>General Comments</b>		
	<p>The progression of the Amberley Neighbourhood Plan (ANDP) to pre-submission stage is to be welcomed and is a result of a considerable amount of hard work by the parish council and volunteers. We recognise that preparing the ANDP can be a challenge at a time when the draft policies for the SDNP Local Plan have been emerging.</p> <p>We congratulate the authors on the succinct and clear way in which the draft plan has been presented. The Vision and core objectives are also clear and follow through the policies. The plan would however benefit from greater linkages to the South Downs National Park purposes and duty. Opportunities to do this are set out in the response below.</p>	
<b>1. Introduction</b>		
Pg 4, 6 <sup>th</sup> bullet point	Should read Horsham District <del>Council Planning</del> <u>Local Development</u> Framework and the .....	Minor amendment
Pg 8, 7 <sup>th</sup> & 8 <sup>th</sup> bullet point	Should read <ul style="list-style-type: none"> <li>• Horsham District <del>Local Plan</del> <u>Development Framework</u> 2007 (saved policies).</li> <li>• The <u>emerging</u> South Downs National Park Local Plan (<u>which reached</u> Preferred Options Stage in Autumn 2015)</li> </ul>	Minor amendment
	There are several occasions where the plan refers to a purpose or aim e.g. top of page 6, last paragraph of pg 4 and top of page 5. You might like to consider an additional section in this introductory chapter expressly communicating the purpose of the ANDP, perhaps with specific benefits as envisaged for this parish.	Consider section which brings together the various aims of the plan.
Pg 7	Missing heading, <b>Section 2 – Context.</b>	Include heading.
<b>3. About Amberley Parish</b>		
Pg 9	Map 2 is missing	Include map.
Table 3.3 Strengths	The SWOT analysis is comprehensive and helpful to understand the origin of many of the policies especially those under the heading ‘Facilities and Infrastructure’. There is however no AONB, the entire Parish is within the South Downs National Park which superseded it.	Remove reference to AONB, replace with reference to location within SDNP.
Pg 16 Footpaths	Should the importance of footpaths to visitors also be mentioned?	Include reference to visitors.
<b>4. Vision and Core Objectives</b>		

4.1 Vision	The first paragraph under section 4.1 talks of a vision for twenty years but the second describes a vision for 9-14 years' time. The vision describes a situation quite similar to today, albeit with cycleways, improved communication technologies. There is nothing here to link to later policies / core objectives on housing mix or tourism development	Consider refining vision.
<b>5. Neighbourhood Plan Policies</b>		
EN1	<p><b>Ecological Sites</b></p> <p>Development in the parish will only be permitted where it contributes to the <del>setting of the</del> <u>special qualities of the SDNP</u> and does not detract.....</p> <p>Query whether the title of the policy is incorrect? It is called Ecological Sites, yet relates more to the special qualities. No mention is made of the SSSI's, Ramsar Site and Downs grassland.</p>	<p>Reword – the Parish is wholly in the SDNP and therefore development will not be contributing to the setting of the National Park.</p> <p>Consider how the special qualities of the National Park can be further incorporated into policy and the NDP. E.g. Amberley Wildbrooks is a tranquil and unspoilt place. The special qualities can be found here:  <a href="https://www.southdowns.gov.uk/wp-content/uploads/2015/03/SDNP-Special-Qualities.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2015/03/SDNP-Special-Qualities.pdf</a></p>
EN2	<p><b>Landscape Character and Open Views</b></p> <p>Would benefit from mention of the special qualities of the National Park that are particularly relevant to the Parish. Consideration of the objectives of the South Downs Partnership Management Plan and how the ANDP might support them would also help to make the plan more National Park focused.</p> <p>Map 1 is labelled Map A on page 42.</p>	Consider how the special qualities of the National Park can be further incorporated into policy and the NDP.
EN4	<p><b>Renewable Energy</b></p> <p>It does not appear that there is any Grade 1 or 2 agricultural land within the Parish?</p> <p>The inclusion of the line 'notwithstanding the above, schemes which can be proven to provide benefit to the community will be considered on their merits' detracts from the level of the detail in the preceding six bullet points.</p>	<p>Check and consider removal of criteria 'f'.</p> <p>Suggest removal of last sentence or at least that some qualification on 'provide benefit to the community' should be given.</p>

EN5	<p><b>Conserve and Enhance the Heritage Environment</b></p> <p>Include reference to the first purpose of the National Park which is ‘To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.’</p>	Additional text suggested.
EN6	<p><b>Unlit village status</b></p> <p>‘Unlit village’ status is not a recognised SDNP designation. It is unclear where this status comes from. Reference should instead be made to Dark Night Skies, which is one element of tranquillity and is a Special Quality of the SDNP.</p>	<p>Provide information on what ‘unlit’ village status means and who such a designation comes from or re-title policy as ‘Dark Night Skies’.</p> <p>Check consistency with emerging SDNPA Local Plan policy on Dark Night Skies.</p>
EN7	<p><b>Local Green Space</b></p> <p>The policy states that the Parish Council has designated these areas. This is not correct, Local Green Spaces are designated through the preparation of a Local or Neighbourhood Plan</p>	Re-phrase policy.
FI 1	<p><b>Create a car park</b></p> <p>The SDNPA is happy in principle to see proposals for public parking provision in or adjacent to designated settlements, such as Amberley, provided that they can achieve overriding traffic management or recreation management benefits, they are part of a strategic traffic management scheme which gives precedence to sustainable transport, and the site is close to and easily accessible from main roads by appropriate routes.</p> <p>We would therefore find it helpful to know if any alternatives to both the proposals and specific site were considered and what the outcome of that work was. Has any consideration been given to demand management, car clubs and ensuring driveways are used (where available) in preference to street parking. How will a car park on the edge of the village encourage residents not to park outside their homes?</p> <p>In terms of the actual policy we would suggest removing any requirement for lighting and ensuring that the paraphernalia that can be associated with car parking such as ticket machines and signage is kept to a minimum.</p>	<p>Consider additions to policy wording. Ensure supporting evidence is robust. Consider linking to the SDNPA document, The Roads of the South Downs and emerging policy SD44: Car and Cycle Parking Provision of the South Downs Local Plan: Preferred Options.</p> <p>An approximate size and capacity of the car park should be set out.</p>

	See also comments in relation to FI 3.	
FI 3	<p><b>Build a joint-use School / Community Hall</b></p> <p>The school/community hall site is very prominent at the southern edge of the village and will be visible from the chalk ridge. Whilst this is not necessarily a reason to object to the proposed allocation, we ask that great care is given in the design of the building and also the car parking layout to ensure that this proposal sits well within the landscape. Car parking will create reflection and the site could appear from a distance/higher ground to be a mini supermarket which would be detrimental to local character.</p>	Consider providing more detail with regard to size, layout, design etc.
FI 2	<p><b>Build a public toilet</b></p> <p>We support the proposals but in terms of deliverability just query how this will be funded and run.</p>	
FI 4	<p><b>Protection of assets of community value</b></p> <p>In the Examination of the Clapham Neighbourhood Plan the examiner made the following comments in relation to a very similar policy:</p> <p>The policy seeks to resist the loss of the facilities and opposes proposal until the site has been marketed for a year which goes beyond the marketing requirements of ACV legislation.</p> <p>I propose the removal of the final sentence as the inclusion of a building on the register is a mechanism that controls the marketing and disposal of such a building.</p>	Consider making similar adjustments to policy.
FI 5	<p><b>Surface Water Management</b></p> <p>In the Examination of the Clapham Neighbourhood Plan the examiner made the following comments in relation to a very similar policy:</p> <p>I believe that the wording of this policy is too prescriptive. It is not appropriate for the policy to impose a requirement on small scale residential extensions or minor additions to commercial buildings. I believe that the wording can be simplified with some of the technical information going into the supporting text. The suggested wording refers to matters that need to be covered by conditions and allows solutions to be put forward rather than following the prescriptive route that the policy currently takes. The first sentence of the final bullet point is not a land use planning policy and is recommended for deletion.</p>	<p>Consider the necessity for the policy (as it will be contained within the SDNPA Local Plan) or amending the policy and seek further input and advice from West Sussex County Council.</p> <p>Also, could the requirement for SUDS, (ecological networks, footpath connections and local green space in other policies) refer jointly to a Green Infrastructure (GI) approach whereby</p>

	<p><b>Recommendations</b></p> <p>That the policy be reworded as follows: -</p> <p>“New development, apart from small residential and commercial extensions, will not be approved unless it can be demonstrated that the development will not increase the risk of flooding either to itself or other land, arising from the carrying out and the use of the development.</p> <p>Any planning permission for new development will be subject to a condition requiring that full details of the proposed surface water drainage scheme has been submitted (including details of its route, design and specification and details of its management and maintenance) and have been approved in writing by the Local Planning Authority.</p> <p>The development shall not be occupied until the drainage scheme has been implemented in accordance with the agreed details”</p> <p>The supporting text needs to be amended to indicate that Sustainable Drainage Systems may be appropriate and to include details as to it not being acceptable in areas with a high water table. WSCC may be able to offer appropriate wording.</p>	<p>they form part of a cohesive network which combines all of these elements together - ie multifunctional landscapes.</p>
FI 6	<p><b>Allocate land for allotments / community orchard</b></p> <p>An approximate number of plots / size of scheme would be helpful.</p> <p>The proposals is not included in the Local Greenspace Designation list, nor the open space list – should it be?</p>	<p>Include details on size of scheme.</p> <p>Consider its designation as some form of open space.</p>
5.5, 2 <sup>nd</sup> paragraph	<p>The SDNPA has <u>provisionally</u> set a housing allocation.....</p>	<p>Clarity – it is not yet within an adopted Local Plan and therefore is subject to change.</p>
HD2	<p><b>Quality of Design</b></p> <p>What is meant by ‘well connected to the surrounding area’ and how does this relate to the quality of design.</p>	<p>Clarify terms. If all bar essential agricultural development is to take place on allocated land or within the settlement boundary, is there a need for this wording at all.</p>
HD3	<p><b>Housing mix</b></p> <p>..... within the Parish of Amberley <u>particularly the need for a</u> including a range of smaller house types.....</p>	<p>Suggest alternative wording to strengthen the policy.</p>
HD5	<p><b>Housing site allocation</b></p>	<p>Consider inclusion of more detail.</p>

	In principal the allocation appears acceptable. However, could more detail be included? Are there particular parts of the site more suitable for development than others, is there a layout in mind or any features within the site that require protection or enhancement?	
HD6	<p><b>Windfall sites</b></p> <p>Criteria 4 – It is not within the powers of planning to prevent people from parking on the public highway, it is more important to ensure that suitable levels of parking are available within the development site or its vicinity.</p> <p>Criteria 4 – Being that the policy relates to development within the settlement boundary it should by default mean that it is easy / possible to walk to local facilities. This clause is therefore unnecessary.</p>	Remove reference to parking on public highways and last sentence regarding access to local facilities.
HD8	<p><b>Attention to detail</b></p> <p>In the Examination of the Clapham Neighbourhood Plan the examiner made the following comments in relation to a very similar policy:</p> <p>Whilst I understand the sentiment behind the policy the wording is written as a mandatory requirement and in some areas cover matters that go beyond what is normally covered by the development management process. Rather than being over prescriptive, the policy is recommended to be a matter where full consideration is encouraged. In many instances the matters being addressed go beyond planning control.</p> <p><i>Recommendation</i> The wording be amended by “The design of new housing should give full consideration to the following items.....”</p> <p>Should mention also be made of oil tanks as well as bins etc, as these are large objects that can be visually intrusive?</p>	Amend wording as suggested, but consider inclusion of mention of oil tanks.
HD9	<p><b>Local Connection</b></p> <p>This policy needs to be reviewed in light of any allocations policy that Horsham District Council operates and their response is required. If these homes are affordable houses, then they will be allocated to those on the housing register by Horsham District Council in consultation with the housing provider and potentially the Parish Council (dependent on the protocols in your area).</p>	Need to review content of this policy with input from Housing Officers at Horsham District Council. Do they operate a local connections policy and if so is policy HD9 adding anything? Is the policy necessary?

	<p>These homes are not available for purchase in the first instance.</p> <p>The inclusion of a criteria in relation to essential agricultural dwellings is inappropriate as the policy relates only to windfall sites within the settlement boundary or allocations. Agricultural workers dwellings will by their nature only normally be required on land outside of the settlement.</p>	Remove criteria in relation to agricultural dwellings.
GA1	<p><b>Footpath and Cycle Path Network</b></p> <p>No map appears to have been included within the document.</p> <p>If this footpath is considered to be of such importance to the community it might be worth considering safeguarding the route to ensure that any development does not adversely affect future proposals that might come forward.</p>	Further information required. Consider safeguarding route.
GA2	<p><b>Pedestrian footways.</b></p> <p>..... lead to the creation of <del>public</del> <u>pedestrian</u> footways.</p> <p>As above are there key routes that should be safeguarded?</p> <p>Could policies GA1 and GA2 be combined?</p>	Consistency of wording. Consider safeguarding.
GA4	<p><b>Traffic Management</b></p> <p>West Sussex County Council in its recent response to the Findon Neighbourhood Plan made the following comments in relation to Quiet Lanes –</p> <p>It is unclear as to why this policy includes the proposal to designate several roads in the parish as Quiet Lanes. Any proposal for this legal status would need to be supported by sufficient evidence. It is suggested that this part of the policy is removed; if it is to be retained then it could be stated in a ‘community aspirations’ section.</p>	Contact WSCC Highways to confirm procedures needed in order to designate Quiet Lanes, this does not fall within planning powers.
ET1	<p><b>Development of new and Existing Businesses</b></p> <p>It is unclear what a ‘service trade’ is, it is not a term used in planning in relation to business</p>	Clarify terminology.

	operations.	
ET3	<p><b>Tourism</b></p> <p>Reference to the proposals for a car park and public toilet might want to be included within the supporting text here to show how the policies link throughout the plan.</p>	Consider additional reference to policies on toilets and car parking.
	<b>Other Comments</b>	
Minerals and Waste	<p>The Amberley neighbourhood plan does not raise any significant minerals and waste planning issues, however, we would like to take this opportunity to request for the West Sussex Waste Plan (2014), the Minerals Local Plan (2003) and the emerging West Sussex Joint Minerals Local Plan to be considered in the production of this Neighbourhood Plan. This is particularly important because a large proportion of the Amberley Neighbourhood Plan area is covered by a Mineral Consultation Area (MCA).</p> <p>The geological map shows that the Gault formation and Upper Greensand formation runs across the parish (i.e clay, soft sand and possibly silica sand). The fact that the site is within an MCA does not mean the housing development cannot go ahead, it just means the planning authority should consult the Minerals Planning Authority (MPA) on the proposal and the MPA may ask for mineral related information to be provided. It may or may not be appropriate to seek prior extraction of the mineral before the houses are built, but this is something that would need to be considered at the planning application stage and potentially once a mineral resource assessment has been provided.</p> <p>MCA's are linked to Policy 2 of the Minerals Local Plan (2003) which stipulates that development will generally be resisted if it would prevent or hinder the extraction of minerals which are, or are likely to become of economic importance. However, please be aware that the boundary of the MCA may be amended and the saved policies contained within the Minerals Local Plan (2003) will be replaced when the Joint Minerals Local Plan is adopted.</p>	