

Hurstpierpoint and Sayers Common Neighbourhood Development Plan

This Representation sets out the South Downs National Park Authority's formal response to the Submission version of the Hurstpierpoint & Sayers Common Neighbourhood Plan. Comments relating to the Sustainability Appraisal are provided separately. Please can this be passed onto the appointed Examiner.

The Vision and Strategic Objectives of the Neighbourhood Plan seek to balance social, economic and environmental objectives. At their core is a desire to retain the intrinsic characteristics that give the village its special appeal and central to the local community's appreciation of where they live. They are supported.

2.6 Other policy frameworks – it is welcomed that there is reference to the South Downs National Park's publications in the list of relevant documents. It is confusing, however, that point 11 seems to repeat point 5. The South Downs National Park Authority (SDNPA) has adopted the **Partnership Management Plan (2014-2019)** – this can be a relevant material planning consideration. It is a 5 year overarching strategy for the management of the National Park. This plan is about influencing change in ways which will leave the National Park in a better state for future generations to enjoy.

SDNPA has published the first stage of the **Local Plan** – this will be the first time the National Park is planned as a single entity replacing existing planning policies prepared at the district level. The Options Consultation Document identifies 55 key issues together with an explanation of how the Local Plan can deal with these. It would be helpful if **section 2.6** made mention of both the Partnership Management Plan and Local Plan. It is acknowledged that these are referenced in section 3.1.

Policy C1 Countryside – Conserving and enhancing character

It is welcomed that the plan seeks to maintain and enhance the quality of the rural and landscape character in the Parish. This protective framework serves to embody the first National Park Purpose as specified in the Environment Act 1995: of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area. There is a concern that the policy as currently worded may be interpreted as having a more permissive intent than would normally be anticipated within the National Park part of the parish. This problem arises if the policy is read in isolation of the other countryside policies in the Plan. It is important that the neighbourhood plan policies are read **as a whole**. While the second National Park Purpose relates to the SDNPA's responsibilities for promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public, the Sandford Principle (and set out in the Environment Act 1995) makes clear should there be a conflict between the two purposes, any relevant Authority shall attach greater weight to the first purpose. There would seem to be at least three options for dealing with this issue:- (i) it is made clearer that Policy C1 must be read in conjunction with the other countryside policies – the National Park policy restates the Act; or (ii) C1 is limited in its scope to addressing the part of the parish outside the National Park rather than being an overarching policy for the whole parish or (iii) further wording in the policy is added to make clear that greater weight will always need to be attached to conservation and enhancement in the National Park.

If the policy continues to apply to SDNP, the South Downs Integrated Landscape Character Assessment describes the landscape character in the southern part of the parish and could usefully be signposted in the supporting text to section 3.1.

Policy C2 Countryside – South Downs National Park

The clear reference to the particular geography of the Parish is welcomed. The signposting to the Partnership Management Plan and Options Consultation Document is supported (the reference needs to be updated as the latter has been published). Proper regard has been made to National Park policy set out in the National Planning Policy Framework (NPPF). It is also extremely helpful that the 2010 Defra Circular on National Parks is mentioned in this section.

The policy refers to the statutory underpinning provided by the Environment Act 1995 and seeks to ensure that the setting of the National Park is properly safeguarded. The inclusion of this policy in the Plan is supported and underlines the particular importance conferred to National Parks and their protection through the national planning system.

Policy C5 Conservation Areas

Similar to the observations on C1 above, it is important that the second prong of this policy is read as a whole with other policies in the Plan. This is because the High Street Conservation Area directly abuts the National Park boundary.

Amenities A1 Hurst Meadows

The proposal to create a new countryside public open space is strongly supported, albeit this proposal is not within the National Park. The policy could potentially be tightened to state more explicitly the type and nature of “informal recreation” opportunities which this open space may be able to preserve. The character of countryside parks varies enormously: some can blend seamlessly into the surrounding landscape where development is tightly controlled. However, they can embody a more ‘theme park experience’ with tracks, pavilions and games areas which can appear obtrusive in the landscape. It is noted the supporting text refers to walking, picnicking and games – the policy could provide a stronger steer for any forthcoming Management Plan by setting out the need to safeguard landscape sensitivity – something which is identified in the supporting text as justification for the proposal.

The comprehensive coverage of local amenities in Chapter 4 is helpful in drawing the reader’s attention to areas of perceived deficit/shortfall in local provision and setting out where provision is currently considered to be adequate and needs have been planned for over the medium to long term.

Policy H1 – housing

(c) (d) (e) could be more positively worded in order to align with the NPPF’s presumption in favour of sustainable development. Development should seek to maintain and where possible enhance the local landscape character. It is unclear whether *any* coalescence is harmful- there may be some limited development or activities which are capable of retaining the sense of openness between the village and the built-up area of Hassocks, although it is recognised the ‘gap’ is narrow and vulnerable to development pressure which could substantially affect its role and function.

Housing H5: Phasing of construction

The Plan has raised considerable concern about the adequacy of the local drainage system and seeks to ensure that new development is properly served by wastewater and surface water drainage systems which can help minimise the likelihood of flooding. Normally, the need to sufficiently boost the delivery of new housing (a guiding principle in the NPPF) would be weighed alongside the ability of a scheme to address a range of infrastructure needs. Particular consideration would be given to severe infrastructure deficits, such as inadequate sewerage provision, which can greatly impact upon quality of life and the vulnerability of property to flooding. It is difficult, however, to see how all community and physical infrastructure can be placed on the same footing. It would not be proportionate and financially viable to expect smaller schemes to address every shortfall in the community and physical infrastructure. Greater certainty of funding for infrastructure will be achieved once the Community Infrastructure Levy has been introduced.

Housing H6: The use of the word houses suggests the exclusion of flats. While flats tend to be less common in rural areas, there may be instances where there is a demonstrable need for this type of accommodation and it is possible to be designed in a way which is in keeping with the surrounding area. Well-designed flats can provide smaller, more affordable accommodation which is often in great demand in an area of high house prices. There may also be circumstances where the sub-division of a house to flats and the redevelopment of a house to flats is a desirable outcome, subject to other planning considerations being satisfactorily addressed.

6.1 Overview para. (d) It is recognised that Hurstpierpoint acts as a ‘gateway’ to the National Park however ‘principal gateway’ suggests a hierarchy of gateways, giving the impression this has been formally set out in a planning document or the National Park Management Plan. At the current time, SDNPA has not identified a list of gateway settlements. Concerns about this reference were previously raised by SDNPA’s Environment and Sustainability Planning Officer in feedback on the Plan (5 March 2013).

Policy E4 – Superfast Broadband

‘Black’ and ‘grey’ status designation needs to be explained to ensure the policy can be properly understood.

Policy E5 – Employment is supported and considered to be compatible with the 2010 Defra Circular for English National Parks.

Transport T1 – Safety

It is unclear in the aim as currently worded what might comprise the “detailed policies” and whether “the Plan” refers to the Neighbourhood Development Plan.

Chapter 7 – Transport

The relationship between the neighbourhood plan and local transport planning documents (such as the Local Transport Plans for West and East Sussex) is unclear. However, it is appreciated that all the objectives in this section form arise from community aspirations/aims rather than policy.

Proposals Maps – the maps supporting the neighbourhood plan are clear and easy to understand.

SUMMARY – our concerns relate to issues relating to the clarity and potential application of some of the neighbourhood plan’s policies and limited conflict with the National Planning Policy Framework. It is considered these outstanding concerns can be dealt with through minor re-drafting

of certain policies which would not substantively change their policy intent. The Plan is concise and well presented and the Parish Council has sought to engage constructively and positively with South Downs National Park Authority throughout the plan production process.