

Comments on the Pre-Submission (Reg 14) Ringmer Neighbourhood Plan

An update on the progress of SDNP Management Plan and Local Plan:

- 1.3 The SDNP Management Plan was renamed the Partnership Management Plan and adopted by SDNPA in 2013.

The Core Strategy has become a Local Plan and this is now expected to be in place by 2017. SDNPA published an 'Options Consultation Document' earlier this year (this does not contain policies or site allocations at this time).

- 1.4 This is pre-submission version of the Neighbourhood Plan (Regulation 14).

- 1.6.6 The SAC lies just beyond the border of Ringmer parish rather than on the boundary.

- 2.1 Vision - there is an opportunity to include the South Downs National Park as a 'valued countryside area'.

- 3.2 and 3.4 Strongly support the observations relating to sustainability and the SDNP in this section.

- 4.1 Support the requirement that development should contribute to enhancing and maintaining the special qualities of the National Park. The planning system accords different levels of weight to the two National Park purposes and the duty. Greater weight should be attached to the purpose of 'conserving and enhancing' if there appears to be a conflict between the 2 Purposes – this is known as the 'Sandford Principle' (see para. 18 of the Defra Circular, para. 115 of the NPPF and para. 1.13 of the SDNP Local Plan Options Consultation Document (Feb 2014). Para. 65 of the Circular states that National Park Authorities are subject to the Duty "in pursuing" the two purposes and (para. 66) "should continue to focus their expenditure on the delivery of their statutory purposes, whilst seeking to maximise the socio-economic benefits available from such activity".

- 4.3 The two major landscape character areas are National Character Areas – South Downs NCA 125 and Low Weald NCA 121. It is the northern scarp slope of the South Downs chalk ridge.

There is a general concern about the approach taken towards screening taken in the document – an assumption is made that screening is inherently a good thing but it can have a detrimental impact on local landscape character if it is not sensitively introduced in the landscape (a 'green curtains' effect shielding development can look unnatural and harm character).

Suggest the final two sentences are removed in their coverage of screening and replaced by text emphasising the need for all aspects of development to be introduced with care (including any mitigation): e.g.

"The siting, location and design of any new developments are very important factors to consider to avoid harm to this high quality and sensitive landscape. Where screening is desirable, possible and appropriate, woodland and hedgerows are particularly effective in mitigating for visual impact when they are sensitively designed with native species and in a layout which is consistent with the surrounding landscape character. Further information on local landscape character is provided by the East Sussex County Council Landscape Character Assessment and for those areas in the National Park by the South Downs Integrated Landscape Character Assessment".

Disagree with the observation that employment and agricultural buildings are “far more acceptable at locations where they are effectively screened from public view” for reasons set out above. Far greater attention to design is required (not may) to ensure a proposal would conserve and have a positive impact on landscape character.

Policy 4.3

The comment relating to the maintenance of screening is supported, however the policy should also state: any structure planting which is appropriate in order to achieve screening, should be designed to be consistent with local landscape character and use appropriate native planting species.

Policy 4.4

I am concerned about the approach this policy and subsequent policies take in the plan towards the conversion of redundant agricultural buildings. While there may be some role for appropriate conversion of such buildings, I feel the plan possibly over-eggs the potential of this particular component of the housing supply. SDNPA has sought (with other National Parks) to obtain an exemption from the new permitted development rights to allow agricultural buildings to convert to residential use. The changes were implemented through the Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 and came into force on 6 April this year.

SDNPA sought an exemption because of concerns relating to the cumulative impact of such proposals on the landscape and therefore, the Local Planning Authority still needs to consider the proposals in detail, ie. through a planning application.

In Autumn last year SDNPA responded to DCLG’s consultation on “Greater flexibilities for change of use” and identified the following issues as possible constraints to the conversion of agricultural buildings:

- Over development in the countryside
- The need to connect isolated buildings with telephone cables, power lines and other infrastructure (e.g. water and main drainage). This could potentially delay the rate at which development can be delivered and lead to a proliferation in obtrusive infrastructure.
- Each new dwelling would create vehicular movements. Agricultural buildings are often located at greater distance from services, facilities and employment centres increasing the number and length of journeys by car (and therefore carbon emissions).
- Future occupants would find themselves living in relatively isolated locations reducing the prospect of community cohesion and integration.
- The potential for greater harm to the significance of heritage assets, conversions to employment uses can often have less invasive impacts (because of the need for less internal sub-divisions and openings in the structure).
- Associated urbanisation in the countryside – enclosure of previously open fields into gardens, addition of sheds, greenhouses, patios, new external lighting (leading to light pollution) and other domestic paraphernalia
- Increased potential for noise, particularly at nighttime harming tranquillity – a special quality of the National Park.
- Land prices for agricultural buildings will be increased, particularly through speculative purchases that further agricultural buildings may, over time, be converted to a residential use.

- Potential for an employment use is foregone harming the rural economy and prospects for job creation.
- Often not a suitable location for affordable housing (greater numbers of people occupying such accommodation do not have access to a car).

With this number of considerations, the contribution of converted agricultural buildings to Ringmer's housing supply from the part of the parish in the National Park must be modest at least.

Policy 4.6

The earlier comments relating to screening are also appropriate in this case.

Policy 4.8

Para. 27 of the Defra Circular for National Parks 2010 would be worth cross-referencing. This states that events should be encouraged which fully engage local communities and visitors, showcase 'greener living', minimise harm to the environment and help to interpret and encourage access to the Park. It also says that the events programme overall should contribute to the sustainable development of Parks and not harm the special qualities.

Policy 5.1

It is unduly permissive with regard to the National Park where there is a statutory purpose to 'conserve and enhance' – harm will only very rarely be acceptable.

Policy 5.5

The desire to improve access to the countryside is supported. There may be an opportunity here to cross-refer to Green Infrastructure studies produced by the District Council and SDNPA.

5.6- the "good access to downland" seems to conflict with the statement in 5.5 that there is "relatively limited public footpath access to the part of the parish within the SDNP".

Policy 5.6

Is this likely to be delivered, at least in part, within the National Park: if this is the case, it would be worth clarifying deliverability/suitability with SDNPA Landscape Officer and Ranger.

Policy 5.7

My understanding is that a listed building can only benefit from this status (i.e. the listing) and grade of protection if this has been identified as being the case by English Heritage.

5.9 this could potentially be combined with 5.5 and 5.6 as a more overarching green infrastructure policy. Policy 5.9 refers to green corridors but the supporting text refers to the importance of other green features e.g. green areas, hedgerows which might not necessarily sit well within the definition of green corridors. "Existing habitat in a developed area" – would this cover any habitat? – it is difficult to understand what this means in spatial terms.

5.10 It is welcomed that there is a strategic policy dealing with nature conservation – this could be an opportunity to include reference to ecological networks perhaps reducing some of the overlap which currently exists between Policies 5.9 and 5.10.

- 6.1 Not *all* employment uses or intensification of employment activity will be supported within the National Park – it should be appropriate to the setting of the National Park and the Park Purposes must not be compromised (para. 8.1 to 8.3 of the Local Plan Options Consultation Document. It would be helpful if there was a proposals map allowing all of the major employment sites to be viewed in their context. Some of the sites are in SDNP and it is important to include reference to para. 116 of the NPPF which relates to all major development in the National Park – the intensification of development on these sites could fall within this definition. Part (c) also raises some concern as it would be necessary that any proposal complies with the criteria in saved policy E9 of the Lewes District Local Plan 2003, not just the general planning policies for Ringmer in section 4. While the most suitable alternative for rural buildings is likely to be an employment generating use, it is important the character of the countryside is maintained and proposals do not lead to harmful impacts, such as a proliferation of outdoor paraphernalia, including storage units and overhead utilities cables in the National Park.
- 6.2 the word land is missing in “productive arable” ; should say *scarp slope*.
 (a) Is the intent of this criterion to give particular protection only for land which is subject to stewardship schemes?
 (c) Proposals for farm diversification should also take into account the range of considerations identified by saved Policy E9 of the Local Plan – a presumption in favour of farm diversification could increase levels of outdoor paraphernalia including storage units and overhead utilities cables in the National Park. The wording is too permissive.
- 6.6 In the National Park, Purpose One has primacy if there is a conflict between the two purposes. Within the National Park area “sustainable tourism” is likely to be a prerequisite for the successful promotion of the wider enjoyment of the National Park, without compromising the special qualities. Para. 81 and 82 of the Defra Circular 2010 are a relevant consideration. Policies 41 to 44 of the Partnership Management Plan are also worth having regard to and Issues 44, and especially 45, of the SDNP Local Plan Options Consultation Document.

Policy 7.3

Will 100% intermediate housing be acceptable or just a proportion?

- 7.4 The conversion to residential use of redundant agriculture buildings may often not be acceptable without the National Park for reasons outlined above; each case would have to be assessed on its merits when a planning application is submitted. Would normally expect a commercial/economic use to be sought prior to residential.

Policy 7.4

about 40 new units – this looks somewhat high? How has this figure been established?

- 7.5 It is important to distinguish between the PD rights which operate for redundant agricultural buildings in the non SDNP part of the Parish and SDNP. The cumulative impact of a large number of agricultural conversions within the National Park could have a detrimental landscape impact – this would be contrary to para. 115 of the NPPF. The fourth category – previously used sites in the countryside do not always provide the most sustainable locations for development – can be quite distant from services and facilities, be stymied by a lack of infrastructure (where it may be more costly to deliver) and be more difficult to foster community integration.

Policy 7.6

This policy could lead to a proliferation of farm buildings being used for residential in the National Park part of the parish – although, it is difficult to establish from Appendix 7.3 precisely how many buildings might be affected. Please can we provided with clarification regarding this matter.

As already stated, the National Park is exempted from the new PD rights for this change of use. There is a concern that the policy, even when read with Section 4, is more permissive than saved Local Plan Policy RES7 – Residential Conversions in the Countryside. For instance, is it intended the requirement that buildings should be capable of conversion without extension or substantial alteration still operates? What about the bulk and design of the building proposed for conversion and the potential for overhead utilities cables? The most suitable alternative for rural buildings in the National Park would normally be an employment generating use subject to impacts on the National Park.

The circumstances in which SDNPA is likely to support the diversification of agricultural land and buildings are set out in Issue 42 of the Options Consultation Document. Issue 21 of the OCD also sets out SDNPA's intended direction of travel with regards to permitting development outside settlement/planning boundaries: *“What we propose to do...Not permit new residential development, except in special circumstances, for example where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal viable use of a heritage asset; or on a rural exception site.”* It seems to me that Policy 7.6 of RNP takes a less restrictive approach. While there will be circumstances when the conversion of a heritage asset to residential represents the optimal viable use this will not always be the best means of safeguarding the significance of heritage assets (housing proposals often lead to greater internal subdivisions of a building, more window opening etc.)

Policy 7.9 and 7.10

I am not entirely sure how many of the sites are within the National Park from Appendix 7.3. We would be willing to provide further advice to the Parish Council on the suitability of individual allocations.

Policy 8.7

I can't tell from the map if this is in SDNP and therefore if this proposal raises any issues relating to local landscape character.