

SDNPA representation on Ringmer Neighbourhood Plan

This Representation sets out the South Downs National Park Authority’s formal response to the Submission version of the Ringmer Neighbourhood Plan. Please can this be passed onto the appointed Examiner.

Page number	Section & paragraph or policy	Comments	Recommendation
	General	<p>South Downs National Park Authority (SDNPA) welcomes the progression of the Ringmer neighbourhood plan to publication which is the result of considerable work by volunteers and the parish council. The neighbourhood plan steering group has sought to engage constructively and positively with South Downs National Park Authority throughout the plan production process. The neighbourhood plan proposal has risen to the challenge of providing a vision of a sustainable future for Ringmer village with careful consideration of it’s close relationship to the South Downs National Park (SDNP).</p> <p>SDNP supports the Ringmer neighbourhood plan proposal but considers there are some minor modifications which would improve the plan and ensure it is line with the purposes and duty of the national park. There are also some recommended points of fact changes.</p>	
7	Environmental characteristics para.1.6.5	<p>This refers to the East Sussex County Landscape Character Assessment but does not refer to the South Downs Integrated Landscape Character Assessment (SDILCA). SDNPA recommends that the SDILCA is identified as the relevant character assessment for the National Park and its setting. For Ringmer, where sites are located within the setting of the National Park, it will be necessary to</p>	<p>Minor modification – para. 1.6.5 to also make reference to the South Downs Integrated Landscape Character Assessment.</p>

		refer to both studies	
7	Environmental characteristics para. 1.6.6	The SAC lies just beyond the border of Ringmer parish rather than on the boundary.	Point of fact – “The internationally important Lewes Downs Special Area of Conservation (SAC) lies <i>just beyond</i> on the border of Ringmer parish...”
17	General planning policies Policy 4.1	Full name is SDNP Partnership_Management Plan	Point of fact – “Such development must conform to the SDNP <i>Partnership</i> Management Plan”
17	General planning policies Policy 4.1	<p>SDNP welcomes this 1st general policy which sets out the weight afforded to the preserving the purposes of the National Park.</p> <p>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”.</p>	Minor modification - refer to greater weight afforded to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area in supporting paragraph 4.1.1
29	Policy 6.1 and Appendix C	<p>While recognising Ringmer Neighbourhood Plan vision for a more sustainable local economy, growth and intensification of employment use within the SDNP will need to be carefully balanced against the purposes and duty of the National Park.</p> <p>SDNPA does have concerns about some of the employment sites</p>	Minor modification – Policy 6.1 could be strengthened to mitigate impacts on the SDNP by making direct cross-reference to Policy 4.1 <i>The South Downs National Park</i>

		<p>within the SDNP and those impacting views from the SDNP:</p> <p>EMP8 Ringmer Hunt Kennels - SDNPA is concerned about the potential extension of employment uses to the south of the road to EMP8 which is currently different in character and density from the Broyle Business Centre. There could be possible cumulative impacts on SDNP combined with employment sites to the north and north east.</p> <p>EMPI6 Substation – this is highly visible from adjacent SDNP downland. Existing use although unsightly does not have significant human movement, activity or noise associated with it. Future uses should be carefully considered in regards to design, layout and activity levels.</p> <p>EMPI7 Stoneham Farm –this site could be improved through re-development to re-establish the farmstead character of the site within the SDNP.</p>	
30	Para. 6.2.1		Point of fact - should read “sits below the scarp <i>slope</i> of the Downs”.
36	<p>Conversion of redundant agricultural buildings to residential use</p> <p>Policy 7.6</p>	<p>SDNPA considers the wording of Policy 7.6 could be made clearer - the phrase ‘useful remaining life’ makes no contribution and just introduces the potential for confusion and disagreement.</p> <p>The policy should also be more effective in protecting the character of existing buildings and the contribution they make to the wider landscape.</p>	<p>Minor modifications -</p> <p>Conversion of redundant agricultural buildings to residential use within the parts of Ringmer parish within the SDNP, or conversion of such buildings in areas of the parish outside the SDNP when the development does meet the criteria for permitted development subject to prior approval, will be supported provided that</p>

			<p>the conditions below are met:</p> <p>(a) The buildings <i>respect the character and form of existing buildings</i>, make a positive contribution to the landscape <i>and</i> are traditional in form and have useful remaining life; and</p>
	Appendix F - Housing sites allocated for development	<p>Consideration of SDNP purposes and duty could be strengthened by providing additional criteria for the following housing allocations:</p> <p>RES15 & RES17 The potential for cumulative impacts from these two sites which are close to the SDNP border should be considered.</p> <p>RES22 is an isolated farmstead within SDNP. It would appear that part of the farm group has already been converted, leaving the main barn and a four-bay cart hovel in their original form. The buildings are typical agricultural buildings of the area and are worthy of retention. Any conversion scheme should be considered against the impact on the character of the buildings and their contribution to the wider landscape.</p>	<p>Minor modifications –</p> <p>Allocations for RES15 & RES17 to make reference to consideration of cumulative impact on SDNP.</p> <p>Allocation for RES22 - number of new units subject to careful design to limit the impact on the character of the existing buildings and their contribution to the wider landscape.</p>
	Appendix I – Development Briefs	<p>I. East of Little Manor, Vicarage Way</p> <p>This development brief relates to RES2. Two points of clarification are sought on this development brief; reference to position adjacent to SDNP boundary and Grade II* listed Little Manor.</p>	<p>Minor modifications –</p> <p>Development brief should state site is adjacent to the SDNP boundary. Reference to Little Manor should be clarified as Grade II* listed.</p>

		<p>3. Orchard behind Vicarage Close</p> <p>This development brief relates to RES32. Any development at this site should be subject to careful design due to it's location immediately adjacent to the SDNP boundary</p>	<p>Minor modification –</p> <p>Development brief should refer to design considerations given location adjacent to SDNP.</p>
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