

SDNPA response to the pre submission draft Ditchling, Streat and Westmeston Neighbourhood Plan

Ref	Comment	SDNPA Recommendation
I	General Comments	
I.1	The progression of the Ditchling, Streat and Westmeston Neighbourhood Plan (DSWNP) to pre-submission stage is to be welcomed and is a result of a considerable amount of hard work by the parish councils, parish meeting and volunteers. We recognise that preparing the DSWNP has been a challenge at a time of transition, with changes underway to the Lewes/SDNPA Joint Core Strategy as it nears adoption, ever changing Government policy and the emergence of draft policies for the SDNP Local Plan. Also the absence of precedent NDPs in the National Park has understandably made your task more challenging. We also appreciate that the draft has been prepared with a limited budget and without commissioning consultants to undertake any of the work. The resulting draft presents a fantastic achievement of the steering group and volunteers, who are to be congratulated on a detailed, positively prepared and wide ranging draft plan, with many good, original and locally specific policies, backed by a significant amount of evidence. That said, we would advise there is still work to be done before taking the plan onto the next stage, as outlined below.	
I.2	The DSWNP sits within the context of national and local planning policies. As currently drafted, several of the policies in the DSWNP re-emphasise much of the protection proposed to be afforded by the policies of the LDC/SDNPA Joint Core Strategy and the forthcoming South Downs Local Plan. This additional layer may risk creating confusion and potentially coming into conflict with higher level policy, thereby undermining the level of protection afforded.	Review all policies in light of the emerging South Downs Local Plan policies and in particular the Joint Core Strategy, to establish what protections will be in place at a strategic level and will not need to be repeated in the DSWNP.
I.4	The level of background detail on the three parishes and the planning context strikes the right balance overall, though there are issues with particular elements of this as outlined below. It would be helpful to include a list of and links to all the evidence documents prepared in support of the NDP at a single location within the plan document, for ease of navigation.	Include a table of evidence base documents with links to each of them.
I.5	It is recognised that a clear distinction has been made between the land use planning policies and aspirational policies, through the use of titled sections. However, they are mixed together in a single referencing structure which may be confusing for developers and planning officers	Move aspirational policies into a separate appendix, or at least a separate section of the document

	taking decisions. The independent examiner of the Petersfield NDP has indicated that community aspirations should be in an appendix in order to ensure that the land use policies are clearly identified and we would recommend you could follow this approach, or otherwise perhaps highlight the land use policies by means of text boxes.	with its own reference numbers.
I.6	To help navigate the document, it would help to have paragraph numbers. This will also assist greatly when it comes to submitting the plan for Examination.	Add paragraph numbers.
I.7	Some changes to terminology are needed, for example, while the document may be titled the 'Ditchling, Streat and Westmeston Neighbourhood Plan', the generic term for this type of document is 'neighbourhood development plan' rather than 'neighbourhood plan'. Neighbourhood Plan when shortened to NP can be easily confused with National Park.	Refer to 'neighbourhood development plan/NDP' or 'DSWNP' rather than 'neighbourhood plan'.
I.8	The plan is presented with a short introduction to each section, followed by policies one after the other, and no supporting text. The SDNPA would recommend that supporting text has a useful role to play in providing detail to flesh out policies and explain how they should be applied, allowing policies to be concise. There are several policies, notably in the Conservation section, where the lack of supporting text currently weakens the policy by allowing for possibly unwanted interpretations.	Consider the value to be added by supporting text.
I.9	The policies on housing are generally welcomed. However, the phrase 'affordable housing' seems to be used loosely throughout the document. 'Affordable housing' has a specific meaning in planning, laid down in the glossary to the NPPF, specifically referring to housing provided to households whose needs are not met by the market. This can include social rented housing, 'affordable rented' housing (whose rent is set at no more than 80% of the local market rent), and intermediate housing such as shared ownership or shared equity housing. The outcome of current government proposals to add discounted 'starter homes' for first-time buyers to this definition is uncertain. Housing for sale or to rent without restriction on the open market, regardless of its cost, is not and will not be 'affordable housing' in planning terms, and where it is at the lower end of the price range would be better described as 'low-cost housing'.	Review references to 'affordable housing', 'affordable houses' etc. throughout the document. Consider whether they refer to affordable housing in the planning sense of the term, and if not, rephrase.

1.10	In general, although most of the policies are good as they stand we feel that there is potential with this plan for the communities to achieve something really special by making the policies better coordinated with each other, especially across the various topic fields. The Sustainable Tourism Strategy which we are currently in the early stages of producing provisionally identifies Ditchling village as a potential tourism hub for this part of the National Park. The combination of new cycle routes and a proposed new car park (in the right location) could contribute to the realisation of this, which would have spin-off benefits for community infrastructure, and could potentially improve the case for other investment in reducing through traffic. This could lead on to the generation of further ideas on green infrastructure, biodiversity improvements, visitor accommodation etc. It would be good to see more of this kind of interconnection between policies reflected in the Neighbourhood Development Plan.	Consider further the cumulative effect of the policies, and the potential to strengthen connections between them to make the plan more than the sum of its parts.
1.11	Map inside front cover: This map will require further improvements before submission of the NDP.	Re-plot the illustrated boundary of the National Park, which currently has several mistakes in it; amend the key to include symbols for each boundary, rather than simply coloured text; change the title, which is confusing at this location within the document, since the meaning of 'beacon parishes' has not yet been explained.
1.12	Contents: All appendices, including maps, must be made openly available to the public alongside the draft plan. Maps of allocations, such as Local Green Spaces and Local Gaps, form part of the Plan itself. For the purposes of clarity, we recommend that each focus group report should be provided with an individual appendix	Make all appendices openly available to the public, ideally with links from within the plan document; give a separate appendix to each focus group report.
2	Section 1 – Introduction	
2.1 Section 'What is a neighbourhood plan?'	As noted above, the correct generic term is 'Neighbourhood Development Plan', and references should be amended to reflect this.	Refer to 'Neighbourhood Development Plan' rather than 'Neighbourhood Plan'.
2.2 Section 'How	For neighbouring parishes in this situation to produce a joint NDP is not unusual, wherever there are good inter-community relations between larger villages and their smaller	Review opening paragraph

was the plan drawn up?’	neighbours. Suggest the opening phrase could be amended to reflect this.	
3	Section 2 – Characteristics of the Neighbourhood Plan Area	
3.1 Section ‘History’	Typographical errors: ‘cay’ for ‘clay’ and ‘juxtapositions’ for ‘juxtaposition’	Typo correction
3.2 Section ‘The settlement’	Whether or not buildings are worthy of listing is determined by Historic England.	Amend ‘that are worthy of listing ‘ to ‘that may be worthy of listing’ or ‘that make an especially positive contribution to the character of the conservation area’ or similar. The promotion of buildings for listing could be the basis for an aspirational policy, if wished.
3.3 Section ‘The settlement’	The second paragraph here contains some hyperbolic statements (‘more than totally self-sufficient’; ‘neither... could have existed in isolation’) which should be revised for the sake of accuracy.	Review second paragraph
3.4 Section: ‘Environment’	In the third paragraph, the second sentence seems to confuse two separate issues arising from the development of nearby towns: traffic impacts and the loss of countryside gaps. Advise separating these out into two separate sentences since each of these is important in its own right. It would be helpful to mention specific examples here since these issues are relevant to policies contained later in the plan.	Review third paragraph
3.5 Section: ‘Society’	Recommend referring to the justifications contained in paragraphs 47-54 of the Secretary of State’s letter regarding the proposed South Downs National Park, dated 31.03.2009, for the inclusion of Ditchling in the National Park. This will carry more weight in planning terms than the evidence submitted to that enquiry by DPC.	Review second paragraph.
	Section 3- National and Local Planning Policy Context	
4.1 Introduction:	For clarity, we suggest adding onto the final sentence of the first paragraph: ‘These areas will remain under Lewes District Council for planning policy matters, <u>while the South Downs National park Authority is the local planning authority for the rest of the Neighbourhood Plan Area.</u> ’	Clarification
4.2	Recommend amending the fourth paragraph by splitting it up into two sentences and	Clarification

Section: 'What documents are used in the guiding policy framework and what is their status':	<p>amending to read 'it will cover the <u>part of the</u> neighbourhood plan area', for the sake of clarity.</p> <p>Please also add in the following documents, here and on page 65:.</p> <ul style="list-style-type: none"> • The East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan (adopted February 2013) • The Waste Local Plan (2006) (saved policies only) • The Minerals Local Plan (1999) (saved policies only). <p>Please note that the Waste and Minerals Sites Plan will replace the saved policies contained in the Waste Local Plan and the Minerals Local Plan when it becomes adopted . For this reason I would encourage Ditchling, Streat and Westmeston to also consider the Sites Plan as the NDP progresses.</p>	
4.3 Section: 'What guidance is provided by the development plan?'	Third paragraph: The requirement is for fifteen dwellings to be allocated, rather than provided, in Ditchling. Therefore the figure excludes dwellings which may come forward on unallocated sites.	Amend 'provide' to 'allocate'
4.4 Section: 'What guidance is contained in emerging plans?'	The South Downs National Park Partnership Management Plan was adopted in 2013, so should be dealt with under the previous section rather than under 'emerging plans'. With regard to the text on the emerging South Downs Local Plan, the summary is generally good, although the plan aims to manage development up to 2032 (i.e. the next 16 years, not 15).	Factual amendments
5	Vision, Objectives and Key Issues	
5.1 Section: Housing	With regard to the first bullet point, consider the meaning of 'affordable housing' against the planning definition in point 1.8 above. Only a few types of affordable housing are available for purchase, namely shared equity and shared ownership housing.	Consider whether 'affordable housing for rent or purchase' is really what is meant here.

5.2 Section: Housing	With regard to the second bullet point, the term 'eco-efficient' is not commonly used in construction; while it is a praiseworthy aim we propose either providing a definition in a footnote, or changing it to, for example, 'uses resources efficiently' or 'sustainably designed and constructed'	Clarification
5.3 Section: Housing	The fourth bullet point could be clarified by changing it to simply 'Has <u>adequate</u> provision for off-street residents' parking'	Clarification
5.4 Section: Traffic and Transport	First bullet point: Recommend replacing the word 'force' with 'encourage', and adding to the end the words 'whilst respecting the historic setting of the village'.	Amend as suggested
5.5 Section: Local Economy	Last bullet point: unclear how off-street parking for residents in particular would contribute to use of community facilities.	Consider moving the mention of resident parking to a different section.
5.6 Overall:	We consider there is more opportunity for synergy between these aims, as per item 1.9 above	Consider further the cumulative effect of the objectives, and the potential to strengthen connections between them to make the plan more than the sum of its parts.
6	Housing Policies	
6.1 Introduction:	Fourth paragraph: affordable housing exception sites are not the only dwellings which may be acceptable in the two smaller parishes: also replacement dwellings, building conversions in certain circumstances, agricultural workers' dwellings.	Amend paragraph
6.2 HSG1:	Second bullet point: please refer to point 1.8. Affordable houses will not be for purchase, other than shared ownership/equity, under the current planning system.	Reconsider wording
6.3 HSG2:	The phrase 'return the maximum housing stock (units) into the SDNP/LDC area' is unclear and seems to duplicate the previous phrase regarding density.	Recommend deleting this phrase
6.4	As currently phrased, this could be interpreted as an extremely liberal policy which would	Make clear that the policy only

HSG3:	lead to almost unlimited housebuilding across the parish, since 'need' is often taken by the Planning Inspectorate to mean 'demand' and 'local' could well be taken to encompass nearby towns and large villages. This would be in conflict with Strategic Policy SD22 of the South Downs Local Plan Preferred Options and Spatial Policy 2 of the Lewes JCS. There would seem to be a strong conflict with DSWNP policy CONS2.	applies to residential development acceptable under the terms of DSWNP policy CONS2; otherwise, delete policy.
6.5 HSG4:	The SDNPA supports this policy, with two conditions: It must be clarified that the policy refers to the subdivision of existing buildings, rather than the subdivision of residential plots. Add a criterion that development should avoid adverse impacts to the character, safety or amenity of the local road network.	Replace the words 'housing stock' with the word 'dwellings' Add a criterion that development should avoid adverse impacts to the character, safety or amenity of the local road network.
6.6 HSG7:	If wished, this could serve as the basis for a land use policy, or criterion within policy CONS3, requiring development to accord with the principles of the VDS when produced. Recommend that the VDS includes a section on typical boundary treatments and entrance designs within the villages and design advice on new features. It could also include a section on 'designing in traffic calming'.	Amend as suggested
6.7 HSG8:	Please refer to point 1.8. re. affordable houses. The difficulties of identifying suitable and appropriate development sites within Ditchling are noted and acknowledged. Unsurprisingly therefore 2 of the proposed site allocations are problematic in landscape terms. Comments on Land to the west of Nye Lane; <ul style="list-style-type: none"> Although there is development in the vicinity of the site, the site itself is a portion of a larger field which occupies a prominent location to the south of the village and is a sizeable component of the undeveloped land to the south of the village. The site forms part of a consistent tract of undeveloped fieldscapes (early enclosures – ref Sussex HLC) which contribute to the setting of the settlement and reduce it's depth and scale in views. Development of part of a field would change the scale and pattern of the landscape in views; thereby affecting the whole field, not only that bit proposed 	Reconsider wording. Remove allocation at Nye Lane Reconsider allocation at Park Barn Farm in the light of the comments below, in particular the need to avoid access from Beacon Road and potential capacity constraints, and the need to avoid negative impact on the amenity of an important footpath.

	<p>for development;</p> <ul style="list-style-type: none"> • The site is prominent in views from the footpath which crosses the adjacent field and connects into the wider PROW network between Ditchling and the scarp slope to the south. Views from the footpath which runs along New Lane would be affected by development including likely loss of existing trees which line the western edge of the track; • The described layout of housing fronting onto New Lane would result in rear gardens being exposed to views from the surrounding PROW network. Any alternative layout of fronting onto the countryside would be likely to appear overly assertive compared with surrounding settlement edge treatments, particularly bearing in mind the number and types of houses proposed the design and layout of any proposal is therefore problematic; • The access to the site appears restricted and any requirement for highway 'improvements' could lead to urbanising impacts including impacts on the adjacent Conservation area. Any associated loss of existing trees would alter the existing rural backdrop to the village in this location and affect the rural character of the PROW; • Views to the Scarp slope are open and it is assumed that there would be visibility of the site from the scarp, and although this would be against the back drop of the settlement it is considered that the site would be prominent in views if developed; • Whilst it is suggested that screening planting could be used along the western boundary, it is considered that this would not reduce the impact on views from higher ground owing to the elevated nature of those views, and also the incongruent nature of screening planting itself which would appear/ be perceived as part of any development rather than an intrinsic element of the landscape; • The proposal for 5 small houses would be inconsistent with surrounding densities which are much lower, properties being largely detached in large plots. The incongruous impact of this would be exacerbated by the site's location at the settlement edge. <p>Comments on Park Barn Farm site;</p> <ul style="list-style-type: none"> • It is queried whether the proposed site can take 13no houses given the existing trees, stream, layout and curtilage requirements; • The site is located to the south of the village and would be an extension of the 	
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	<p>settlement in this sensitive location between the edge of the village and the transitional landscape which leads to the scarp slope and the South Downs ridge beyond. Whilst this in itself may not make the site undesirable to develop, what is problematic is the access to the site. No indication of the access to the site is given in the plan. It is considered that any provision of access off Beacon Road would result in an unacceptable impact on the existing landscape framework – existing trees, hedgerows, topography and field pattern (see further information below);</p> <ul style="list-style-type: none"> • An alternative access may be possible through negotiation through Long Park Corner, there is an area of garage courts to the north of the site which could be included within a development which could be beneficial in design terms to the townscape; • Aside from the issues with access - development (properties, access and domestic curtilage arrangements) would be visible from the Sussex Border Path (SPB) to the immediate west of the site this route is important for access to the scarp slope & Ditchling; • The route of Beacon road is lined with dense vegetation along its length. At the site location this verge side planting has some depth into the site and appears to be consistent in age with the Ancient woodland opposite. • The Historic Landscape character assessment identifies the field patterns to the west of Beacon Road as 'early enclosures dating from 1500-1599AD. This is representative of significant time depth in the landscape - this includes the boundary features (as these define the layout). 	
7	Traffic and Transport Policies	
7.1 TRANSI	<p>The SDNPA is content in principle to see proposals for public parking provision in or adjacent to designated settlements, such as Ditchling, 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. We would therefore find it helpful if you could provide the justification for this allocation, demonstrating the extent of the overriding traffic or recreation management benefits, and also to see an explanation of the role that it plays in an overall scheme for increasing the accessibility of Ditchling by bus, bicycle and on foot. With regard to the particular site proposed, we have concerns over the landscape impact as laid out below, as well as connectivity to the rights of way network, and would therefore wish to see a justification for why this site in particular should be chosen.</p>	<p>Provide additional supporting evidence and detail on the allocation to address the issues raised.</p>

	<p>The site is relatively small and would be capable of being screened to a degree by appropriate native hedgerow and tree planting. However there may be views from the chalk ridge to the south and unfortunately these may be exacerbated by reflections from the cars themselves. With this in mind we would like to see these avoided as far as possible by on site tree cover in addition to boundary planting. We are concerned about visibility splays into the site which may require the removal of the existing mature hedgerow along the Keymer Road, which would be detrimental to local landscape character and would open the site to views. Detailed design of the entrance would also need to take account of local rural character - ie gates, fencing, bollards, signage etc. We would be keen to see the car park accessible to horse boxes.</p> <p>The allocation does not identify any need to improve the existing pavement along Keymer Road & this could also affect rural character if significant alterations are required by the Highway Authority.</p>	
<p>7.2 Aspirational traffic and transport policies</p>	<p>The SDNPA is committed to working together with ESCC and the local community to address traffic and transport issues in Ditchling. We welcome initiatives from the local community to this end, where they contribute towards the purposes of the National Park. However, we would note that ESCC are the Local Highways Authority and only they have the ability to implement policies on the highways. We were consulted on LTP3, which is the adopted Local Transport Plan for the area, and would urge the communities in the Beacon parishes to recognise that as a baseline on which to build. We appreciate that LATS is no longer entirely up to date and would suggest that future proposals should be based on the evidence that supports LATS, where still valid, rather than on the document itself. We would recommend making use of and referring to the document 'Roads in the South Downs' developed with ESCC and the other LHAs in the SDNP. Some of the technologies and infrastructure proposed would be unlikely to respect the status/setting of the highways as historic routes.</p> <p>We would recommend looking for the potential connections between these policies and others, for example on community facilities, as noted in section 1.10 above, which may help to support the case for some of the transport changes proposed. We look forward to discussing these issues further with the project management group.</p>	<p>Consider the policies further in the light of these comments.</p>

7.3 TRANS10	<p>We welcome the proposals in this policy, in particular the commitment to east-west links.</p> <p>We would welcome the delivery of a route towards Lewes. This may also be a useful policy in which to promote the provision of safe crossing places of busy roads. The reference to 'foot and cycle paths' should be changed to 'foot, cycle and equestrian paths</p> <p>Where concrete proposals for new routes exist, it may be desirable to safeguard them from future development with a specific land-use policy.</p>	Revise policy wording
9	Conservation Policies	
9.1 Introduction:	<p>With regard to the third paragraph, once the JCS is adopted it will indeed apply to the totality of the three parishes. After the South Downs Local Plan is adopted then it will apply to the whole of the National Park; we would not intend to exclude Ditchling, Streat and Westmeston from this. We would recommend the three parishes engage with the Local Plan production process to ensure they are happy with the policies proposed.</p>	Remove paragraph
9.2 CONS2:	<p>With regard to the second bullet point, some supporting text would be extremely useful here to provide more detail on the interpretation of terms such as 'existing dwelling' and 'materially larger', or else link across to the South Downs Local Plan which will provide such detail (currently in draft policy SD45). Have the steering group considered how, for example, this policy would treat a dwelling where successive extensions are proposed over a period of several years?</p>	Insert supporting text.
9.3 CONS2:	<p>With regard to the fifth bullet point, some supporting text would be extremely useful here to provide more detail, or link across to the South Downs Local Plan which provides more detail on this topic.</p>	Review policy in light of emerging Local Plan policy.
9.4 CONS3:	<p>This policy would seem to duplicate a lot of the material in the Strategic Policies of the South Downs Local Plan, notably draft policies SD5: Landscape Character and SD6: Design and we would recommend considering how much of this is required. The reference to native/non-native species planting in the second bullet point of the policy is unclear and may conflict with criterion 2b of Strategic Policy SD5.</p>	Reconsider the necessity of much of the policy. Reword or remove the second point.
9.5 CONS6:	<p>In its current form, this policy seems to overlap with South Downs Local Plan draft policy SD41 (Archaeology), without adding anything. We would recommend either redrafting the policy or reconsidering the need for such a policy.</p>	Redraft, or reconsider the necessity of this policy
9.6 CONS7	<p>We welcome reference to the Ditchling Historic Character Assessment but would note that it covers more than just the conservation area of Ditchling, and indeed is not directly related to the Conservation Area.</p>	We would recommend separating out the second part of this policy into a new policy which relates to Ditchling village as a whole, rather

	<p>Suggest including a comment about boundary treatments for new properties to be in keeping with surrounding properties and public realm treatments</p> <p>Suggest reference to the Sussex historic landscape character assessment.</p>	than just the Conservation Area.
9.7 CONSI0:	<p>Suggest that the expression ‘priority given to landscapes in the National Park’ could be misinterpreted and the following alternative wording is recommended;</p> <p><i>‘The distinctive landscape, views and scenic beauty of the neighbourhood plan area should be conserved and enhanced. The landscape of the South Downs National Park and its setting shall be protected in accordance with legislation, national planning policy, and planning policy guidance.’</i></p> <p>Suggest that the first bullet point is reworded as follows:</p> <p><i>Development proposals should be supported and informed by a demonstrable understanding of local landscape character which involves reference to the appropriate landscape character assessments (including the Sussex Historic Landscape Character Analysis) and other relevant documents.</i></p>	Amend as suggested
9.8 CONSI2:	<p>While the SDNPA is not aware of any issues with the designation of these sites as Local Green Spaces and a Settlement Gap, the supporting documents to the Neighbourhood Plan should demonstrate how the proposed Local Green Spaces meet the requirements of the NPPF (paragraphs 76-78) and provide adequate evidence supporting the allocation of the settlement gap. Please see the Inspector’s report (hyperlink) on the Farringdon Neighbourhood Plan for the implications of not providing this evidence. Early engagement with the owners of these sites should also be demonstrated to show that their views on the proposed designation have been given due consideration.</p>	Need to demonstrate adequate evidence for allocations, and engagement with landowners on these sites.
9.9 CONSI4:	<p>The first bullet point says “extend the conservation area proposed in the Ditchling conservation area character appraisal” – this would be more clearly expressed by saying “adopt the extensions to the existing conservation area proposed in the adopted Conservation Area Appraisal”</p>	Amend wording as suggested
9.10 CONSI6:	<p>We would recommend that this policy be reviewed in the light of the forthcoming Habitat Connectivity Study to be published by the SDNPA, and forthcoming information on potential habitat improvements being produced by the charity Butterfly Conservation. We would</p>	Review policy on the basis of forthcoming information

	encourage the incorporation of mapping from these studies into the Neighbourhood Plan appendices.	
9.11 CONS 17:	This work should be in conjunction with the SDNPA, which is the Local Planning Authority for Ditchling, not Lewes DC.	Amend as suggested
10	Community Infrastructure Policies	
10.1 COM1:	As it stands, the first paragraph of this policy is not consistent with Strategic Policy SD29 of the draft South Downs Local Plan, which directs new retail developments to village centres (including the centre of Ditchling) and places various criteria on retail elsewhere.	Revise policy to be consistent with SD29.
10.2 COM1:	The second paragraph of this policy is supported but the phrase 'all efforts' is too vague. Exact requirements for marketing should be set out. Please see the Petersfield Neighbourhood Plan for an example.	Review details