

SDNPA response to the Regulation 16 Consultation on Milland Neighbourhood Plan

Ref	Comment
1	General Comments
1.1	<p>The SDNPA made detailed comments at the Regulation 14 pre-submission consultation and we are pleased to see that many of the issues raised have been addressed in the submitted Milland NDP. In particular, the requirement to include a settlement policy boundary in the NDP has been addressed and the SDNPA supports Milland Parish Council's use of the SDNPA methodology in defining the new settlement boundary.</p> <p>The SDNPA have a number of comments to make on the submitted NDP, these largely relate to policy wording and providing clarity for the decision-maker and ensuring there are no conflicts with national policy and guidance. There is however a degree of confusion and conflict between policies regarding the core village, infill, ribbon and market housing development. The NDP appears to apply only affordable housing will be supported throughout the parish and this is not justified. The SDNPA welcomes the references made to emerging South Downs Local Plan policies and we have highlighted the remaining limited areas of potential conflict with future Local Plan policy.</p> <p>We would like to commend the Parish Council, volunteers and Milland community on their efforts to prepare a detailed Neighbourhood Plan, which is one of the first within the National Park to address the issues of a rural parish of scattered settlements within a highly valued natural setting.</p>
2	The Plan – section 3
2.1	<p>Policy HDI Heritage Sites</p> <p>Some of the wording in this policy does not provide clarity to the decision-maker – use of the terms 'Development that 'might' damage and 'potential' heritage site are vague. The requirement for independent archaeological research should be proportionate to the value of the heritage asset.</p>
2.2	<p>Policy S1 Core Village Development</p> <p>Some of the wording in this policy does not provide clarity to the decision-maker – use of the terms 'In general' and 'appropriate further development' are not clearly defined.</p> <p>The policy restricts housing development within the settlement boundary to affordable housing only, this is not in line with emerging South Downs Local Plan Policy SD22 and does not appear to be sufficiently justified. The policy also appears to restrict infill development to affordable housing which may not be deliverable. There also appears to be a conflict between this policy and Policy S2</p>

	<i>Development in Smaller Settlements.</i>
2.3	<p>Policy S3 Ribbon Development</p> <p>It would be helpful to clarify when infill development is considered to be ribbon development and it is felt that there is some conflict with policy S1.</p>
2.4	<p>Policy S4 Wheatsheaf Enclosure & Policy S5 Mill Vale Meadows</p> <p>It would be helpful to show both areas for these policies on a map and refer to these in the policy. 'Loft conversions' is suggested as a better phrase than loft extensions.</p>
2.5	<p>3.2.2 Design</p> <p>It would be helpful to provide clarification of what 'sussex style' means – a definition and some images could be included in the appendix for example.</p>
2.6	<p>Policy HD4 Core Village Design</p> <p>It would be helpful to clarify what are the existing materials and styles of the core village that new development is expected to use.</p>
2.7	<p>Policy HD5 Historic Buildings</p> <p>This policy does not appear to add anything further already provided by national policy.</p>
2.8	<p>Map 20 (page 28)</p> <p>It would be helpful to have this map at a larger scale.</p>
2.9	<p>Policy I2 Lanes</p> <p>It should be clarified that this policy can only relate to development within the Neighbourhood Area.</p>
2.10	<p>Policy H1 Enlarged Homes</p>

	<p>The second part of this policy requiring the re-provision of small units will be unviable in most instances and should be removed. However the ambition of this policy is supported and is in line with emerging South Downs Local Plan Policy SD45 <i>Replacement Dwellings and Extensions</i>.</p>
2.11	<p>Policy H2 Affordable Housing</p> <p>The SDNPA has some concerns about the future implementation of this policy, in particular the in-perpetuity affordable housing requirement which is unlikely to be in line with national guidance. Also the inclusion of the current CDC definition of 'local connection' hierarchy may also become out of date. It is recommended that instead the policy says allocations will be made in accordance with the housing authority local connection hierarchy.</p>
2.12	<p>Policy H4 Market Housing</p> <p>The restrictions on market housing in this policy are overly onerous and require developers to demonstrate a level of assessment and detail which for a small scale 1 or 2 unit scheme would be impossible to achieve. The restrictions on market housing in the core village are also not in line with emerging South Downs Local Plan policy SD22. There is also room for conflict and confusion between this policy and policy S1. Criteria 2 to limit brownfield development to 5 units is not justified. Criteria 4 should also make clear that it is infrastructure directly related to the development that will be required.</p>
2.13	<p>Policy H5 Housing for Rural Workers</p> <p>This policy could be clarified by stating that the loss of estate worker dwellings will be resisted where occupancy conditions exist.</p>
2.14	<p>Policy H6 Granny Annexes and Sheltered Housing</p> <p>The design of granny annexes is also important, for example the separate front door should be subservient to the main house front door and does not appear to be a separate dwelling.</p> <p>It is unlikely that a local connection criteria will apply to sheltered housing as this type of housing is normally developed by a private provider.</p>
2.15	<p>LEI Commercial Development</p>

	<p>The wording of this policy could be improved, for example ‘development’ is a better phrase than ‘building development’. Criteria I should make clear that it is infrastructure directly related to the development that will be required. Preference for particular road routes would be better placed in the supporting text.</p>
2.16	<p>LE5 Equine Enterprises</p> <p>It would not be possible to enforce criteria 2 of this policy (no horseboxes in the narrow lanes) and this should be removed.</p>
2.17	<p>Paragraph 3.5.4 Leisure pursuits and tourism</p> <p>Quoting a policy from another Local Plan (Exmoor National Park) in the supporting text could be confusing and we suggest this is removed.</p>
2.18	<p>Policy LE7 Leisure Pursuits</p> <p>For clarity, the following should be removed from the policy text: “Noisy leisure pursuits that disturb the area’s tranquillity, disturb wildlife, have an impact on dark night skies, damage the land or detract from the landscape and character of the area will not be permitted near any of the settlements and be strictly controlled elsewhere;”</p>
2.19	<p>Policy LE8 Visitor Accommodation</p> <p>Much of what is covered by this policy does not require planning permission (up to 5 caravans / motorhomes and unlimited tents, where licensed by the Caravan Club as a certified site can happen without planning permission)</p>
2.20	<p>Policy LE9 Golf Courses</p> <p>This policy is not currently worded in a manner suitable for development management purposes and lacks justification for refusing all mitigation measures. A golf course will most likely be considered as ‘major development’ in the National Park context and will need to meet the exceptional circumstances and public interest tests set out in NPPF paragraph 116.</p>
2.21	<p>LE10 Community Buildings</p> <p>Maintenance doesn’t normally require planning permission and this should be removed from the policy. The requirement to demonstrate local need appears to be an overly onerous requirement on a proposal for a community facility.</p>

2.22	<p data-bbox="358 228 2000 268">LE11 Green Spaces</p> <p data-bbox="358 300 2000 402">The requirement that any replacement community green space is favoured by the community could be an unachievable criteria. Policy could instead require community engagement in any alternative green space proposals.</p>