

24 November 2014

The Clerk to the Council Albourne Parish Council Jordans Cottage Street Lane Ardingly RH17 6UB

Dear Sir / Madam

Subject: Albourne Parish Council Neighbourhood Plan

Thank you for consulting the South Downs National Park Authority (SDNPA) on the consultation draft of the Albourne Parish Council Neighbourhood Plan.

The National Park Authority welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community.

The detailed representation of the SDNPA on the plan is set out in a table attached to this letter.

Please do get back to me if you have any queries on this representation.

Yours faithfully

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Chief Executive: Trevor Beattie

Recommended new text in italics

Page	Section	Comments	SDNPA Recommendation
number			
	General	The South Downs National Park Authority (SDNPA) welcomes the publication of the Pre-submission version of the Albourne Parish Council Neighbourhood Plan, which is the result of considerable hard work by the parish council and the local community. The inclusion of the purposes of the National Park set out in the Environment Act 1995 under policy C2 is particularly welcomed.	None
	Front cover	The plan period should be provided e.g. 2015-2030. It is also helpful to include the status of the plan on the front cover e.g. 'Plan proposal submitted to Mid Sussex District Council & SDNPA, Month, Year'	Add plan period Add plan status
	Contents	It would be helpful to have page numbers Section 8 – Schedule of evidence could go in appendices	Add page numbers Move section 8 to appendices
	General	The plan helpfully distinguishes between policies and aims. A separate numbering system for these two would provide further clarification.	Use a separate numbering system for policies and aims.
3	Introduction	The introduction should include a map of the designated neighbourhood area and date when the area was agreed. 2 nd para. final sentence should also reference the adopted Local Plan and other material considerations	Move map on page 23 to introduction. Add date when area was agreed. "All subsequent planning applications would be tested against the policies in this Neighbourhood Plan and the adopted Local Plan (known as the Development Plan for the area). Proposals which meet the policies of the Development Plan would normally be permitted unless material considerations indicate

Page number	Section	Comments	SDNPA Recommendation
			otherwise." Include paragraph numbering as with other sections.
5	Background and general policies	2.5 Other Plans and policy frameworks It is the 'saved policies' of the Local Plan 2004 that are relevant. SDNPA Partnership Management Plan and Local Plan emerging policies are also relevant.	 Mid Sussex District Council – Local Plan 2004 saved policies SDNPA – Partnership Management Plan emerging Local Plan policies
6	Policy CI	To provide extra clarification policy C1 could be amended to read that development will 'only' be permitted in the countryside if it meets the three criteria. The policy otherwise is unduly permissive.	Amend policy text: "Development, including formal sports and recreation areas, will <i>only</i> be permitted on the countryside, defined as the areas outside the built-up boundary shown on the policy may, where the following criteria are met:
6	Countryside, landscape & conservation Para. 3.2	The South Downs National Park Local Plan is due to be adopted in 2017. Suggest removing the year from the end of the 1st sentence.	Remove '2014'
7	Policy C3 Local Gaps	A map showing the areas to be protected as Local Gaps would be helpful and aid effective decision making. To provide extra clarification policy C3 could be amended to read that	Include map showing Local Gaps Amend policy text: "Development will only be permitted in the

Page number	Section	Comments	SDNPA Recommendation
		development will 'only' be permitted in the countryside if it meets the three criteria. The policy otherwise is unduly permissive	countryside provided that"
8	Policy C4 Conservation Area	2 nd paragraph is supporting text rather than policy	Move 2 nd paragraph to supporting text.
10	Para. 4.2	Criterion vii should also refer to the setting of the national park.	Amend text: vii. The National Park boundary and setting;
10	Policy HI New Housing Development	Consider using number criteria for this policy i.e. Sites should; i) positively enhance the existing settlement pattern ii) not harm the countryside around iii) not contribute to any coalescence etc, etc.	Use numbered criteria in policy
П	Policy H2	Criteria should be numbered	Number the criteria
II	Policy H3	This is not a policy that would be used to determine planning applications. The supporting text suggests the sites identified in the neighbourhood plan will not provide any affordable housing contribution. This however contradicts Policy H5.	Re-label as plan AIM Reword supporting text.
12	Policy H5	To provide extra clarification it would be useful to specify what is meant by 'local people' in policy H5. It might be useful to refer to policy HP6 of the Draft Petersfield Neighbourhood Plan, which includes a similar policy and then carefully defines the eligibility criteria for 'local people.'	Amend policy Include definition of 'local people' and requirement that homes remain affordable in perpetuity.

Albourne Parish Council Neighbourhood Plan, SDNPA comments on Consultation Draft, September 2014

Page number	Section	Comments	SDNPA Recommendation
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		Furthermore, the parish council may wish to consider requiring the homes to be affordable in perpetuity	
14	Policy E3	Number the criteria in this policy to aid effective decision-making.	Number the criteria in this policy.