

22 December 2014

Mr Mike Dodd Chairman Hamsey Neighbourhood Plan Steering Group

Dear Mr Dodd,

Subject: Hamsey 2014-30 Neighbourhood Plan, Pre-submission Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the consultation draft of the Hamsey 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 Sincerely

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General		The South Downs National Park Authority (SDNPA) welcomes the publication of the Pre-submission version of the Hamsey 2014-30 Neighbourhood Plan, which is the result of considerable hard work by the local community and the parish council. Over just half of the designated neighbourhood area falls within the South Downs National park (SDNP) including the settlements of Offham and Hamsey. The pre-submission plan is a well structured plan and contains a number of policies and projects which are well aligned with and support the National Park vision and Partnership Management Plan.	None
General		For clarity it would be helpful to use paragraph numbering throughout the Hamsey Neighbourhood Plan (HNP).	Add paragraph numbering
10	2. Why we need a Neighbourhood Plan	This section should make clear that SDNPA is the Local Planning Authority for part of the Parish.	Add paragraph: SDNPA is the Local Planning Authority for the area of Hamsey Parish within the National Park. Arrangements are in place, for Lewes DC to handle the majority of planning applications within the National Park boundary on behalf of SDNPA. Add paragraph:
		The strategic planning context for Hamsey is quite complex but also important for setting the parameters for the Neighbourhood Plan. This section should explain the strategic planning context and status of the Local Plan.	Currently the adopted Local Plan for Hamsey Parish consists of the saved policies of the 2003 LDC Local Plan. This will be replaced by the Lewes Joint Core Strategy once adopted. The SDNPA is also preparing a Local Plan for the

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			National Park which once adopted will replace the Lewes JCS for areas within the National Park. Revise final paragraph:
			If the HNP is supported in the Referendum it will form an integral part of the Local Plan for Lewes District. It will guide future development in the Parish of the statutory development plan for the Parish and will be used by the Local Planning Authority to make decisions on planning applications.
17	Landscape and Environment	The final two paragraphs under Flooding read as policy wording rather than supporting text. Consider elevating these paragraphs to policy status.	Revise wording
20-26	Local Green Spaces	SDNPA supports the identification of Local Green Spaces for protection within the HNP, three of which are within the National Park (LGS2, 3 & 5). The supporting text for LGS1-5 provides helpful justification for the designation of LGS and makes good use of community feedback and local wildlife data to demonstrate their local value in line with NPPF para. 77	None
33	7.7 Landscape and Environment	HNP/EN1 reads as an objective rather than planning policy that could be used to assess planning applications.	Revise wording

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number	9.3 Housing and Growth Development	The HNP does not allocate sites but instead indicates that this will be done through work with LDC – presumably through the Lewes Local Plan Part 2: Site Allocations and Development Management Policies Document. The HNP needs to acknowledge that sites could also be allocated in the National Park part of the Parish. Either the HNP could do this or SDNPA can via the emerging South Downs Local Plan. National policy set out in the National Planning Policy Framework paragraph 116 is relevant and states major development in National Parks should be refused except for exceptional circumstances. These exceptional circumstances include having ruled out developing elsewhere outside the National Park, or meeting the need for the development in some other way.	This section should acknowledge that sites could also be allocated within the National Park part of the Parish subject NPPF paragraph 116.
42	Site Selection Policies	Policies H1- H12 could be combined into one criteria-based policy.	Combine into a single criteria policy.
43	HNP/H14	The appropriate proportion of affordable housing is currently set in Saved Local Plan 2003 policy RES9. This will shortly be replaced by the Lewes Joint Core Strategy. In time, the SDNP Local Plan will also set an appropriate affordable housing mix for development within the National Park. To future proof this policy, reference would be better made to the adopted Local Plan.	Revise text: HNP/H14 Ensure the Parish is a balanced community, including an appropriate element of affordable housing (as specified in the adopted Local Plan Lewes District Council Core Strategy / Local Plan).
47	Transport and Travel Policies	TT1-TT3 could be combined into a single criteria-based policy. TT4 appears to be an aspiration of the HNP which extends beyond the	Revise wording

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		remit of any single development or combination of development sites.	
53	Recreation and Sport	SDNPA welcome the emphasis given in HNP to recreational and sustainable access to the National Park.	
		On becoming designated as a National Park, the AONB status of the South Downs was removed.	Remove reference to Area of Outstanding Natural Beauty in 2^{nd} paragraph.
58	Recreational and Sport Policies	Refer to enhancing accessibility of South Downs National Park.	Revise wording: HNP/RSIenhancing the accessibility of Beechwood Hall and Rural park and the South Downs National Park Authority
60	The Local Economy	3 rd paragraph – refer to South Downs National Park	Revise wording:provided by the establishment of the South Downs National Park Authority, for which Cooksbridge Station is a natural gateway.
62	The Local Economy Policies	Consider caveating this policy with development and diversification of agricultural and other land-based rural businesses at an appropriate scale will be supported. For example, large scale glass houses could have an adverse impact on the landscape. Should any diversification on farms be linked to supporting the continuation of the core farm business?	Revise wording

Hamsey Neighbourhood Plan, SDNPA comments on Pre-Submission Version, 24 November 2014