

22 June 2016

Mr Redpath
Chairman
East Meon Neighbourhood Plan Steering Group

Dear Mr Redpath,

Subject: East Meon NDP 2016-2032, Pre-submission Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Pre Submission consultation draft of the East Meon 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 East Meon Neighbourhood Planning group should be commended for their dedication and hard work in getting the Neighbourhood Plan to this stage.

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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SDNPA response to the pre-submission East Meon Neighbourhood Plan

Ref	Comment	SDNPA Recommendation to East Meon Parish Council
General Comments		
	<p>The progression of the East Meon Neighbourhood Plan (EMNP) to pre-submission stage is to be welcomed and is a result of a considerable amount of hard work by the parish council and volunteers. We recognise that preparing the EMNP can be a challenge at a time when the draft policies for the South Downs Local Plan have been emerging.</p> <p>We congratulate the authors on the succinct and clear way in which the draft plan has been presented. The Vision and core objectives are also clear and follow through to the policies. The Neighbourhood Plan is well written with clear justification for policies and site allocations which are fully evidenced with reference to public opinion on specific matters.</p>	
	Throughout the EMNP there is reference to the emerging South Downs National Park Local Plan, the correct name for this plan is South Downs Local Plan (SDLP), the words National Park should be removed	Amend all references to the South Downs National Park Local Plan by removing National Park. The reference to National Park should also be removed from the acronym of South Downs National Park Local Plan, SDNPLP
	Throughout the EMNP there are several references to South Downs Local Plan policy numbers. If the EMNP refers to SDLP policy numbers it should refer to the South Downs Local Plan: Preferred Options, as policy numbers may change in future versions of the plan.	Where there are references to the SDLP policy numbers please ensure that the reference is to the South Downs Local Plan: Preferred Options
Evidence Base	The link to the East Meon Conservation Area Appraisal and Management Plan is incorrect as it currently links to a consultation version, the correct link is https://www.southdowns.gov.uk/wp-content/uploads/2015/04/East-Meon-CAAMP.pdf The correct title for the document (East Meon Conservation Area Appraisal and Management Plan) should also be used	Correct link to be included in Neighbourhood Plan evidence base. Minor amendment to the title of the document.
Hampshire Minerals and Waste Plan 2013	SDNPA can confirm that there are no safeguarded minerals or waste facilities within the Neighbourhood plan area. However, the plan should still be in general conformity with the adopted Hampshire Minerals and Waste Plan 2013, which is part of the development plan for the area. A reference to this effect should be added to paragraph 1.3 of the Pre Submission Plan. Reference to this part of the development plan should also be included in the basic conditions statement which will be submitted with the submission version of the Neighbourhood Plan	Minor amendment to ensure the EMNP identifies all relevant parts of the development plan with which it should be in general conformity.

	1. Introduction	
1.17	The planning policy context paragraph states that the Local Planning Authority for East Meon is East Hampshire District Council, through the saved policies of the EHDC Local Plan 2006. This statement is incorrect. The South Downs National Park Authority are the Planning Authority for East Meon. The relevant planning documents for the determination of planning applications are; The National Planning Policy Framework; The East Hampshire Joint Core Strategy; The saved policies of the EHDC Local Plan 2006 and the emerging South Downs Local Plan	Minor amendment
1.17	The current paragraph suggest that the East Meon Neighbourhood Plan will be adopted at a similar time to the SDLP. However, recent changes to the timetable for the SDLP indicate an adoption of the SDLP in 2018, which may not align with the 'making' of the EMNP. The point being made in the final two sentences of paragraph 1.17 is correct but the sentences may need to be revised given the change to timetable for SDLP	Minor amendment to reflect changes to the SDLP timetable
	2. Parish Profile	
	The EMNP group should be commended for the detailed description of landscape character area which East Meon falls within, and the reference to the South Downs Integrated Landscape Assessment. However, the SDNPA would also recommend that the EMNP makes specific reference to the SDLP Broad Spatial Diagram (page 41 of the SDLP) and in particular to the broad spatial area which East Meon is located (The Dip Slope).	Additional text to reference the SDLP Broad Spatial Diagram, and in particular the Dip Slope and draft Policy SD4
	3. Our Vision	
3.5	The neighbourhood plan objective relating to Natural Landscape makes reference to the importance of watercourses, it would be helpful if the specific water courses were referenced and shown on a map to ensure there is no confusion	Make specific reference to the important water courses referred to in the natural landscape objective
	In the objective to retain and enhance the villages existing services and facilities there is reference to the Green Spaces valued by the local community at the end of the first sentence. Capital letters are not required.	Amend text as follows....Ggreen \$spaces
	4. Neighbourhood Development Plan – Policies and Proposals	
4.3	Reference should be made to the National Park's Purposes and Duty	Include reference to the 'Duty' as well as the two purposes of the South Downs National Park Authority
4.6	To properly reflect the status of the South Downs Local Plan, the term preferred options should be included	Minor amendment as follows.... Core Policy SD1 of the South Downs Local Plan Preferred Option
	5. Neighbourhood Plan Policies	

EM1	The policy currently refers to Policy SD23 of the SDNPA Local Plan, text should be amended as proposed in recommendationon the sites defined as A3, B2, B3/4 and B9 to meet <u>the draft housing policy SD23</u> of the SDNPALP
EM1	The table describing the site allocations for housing development should include a total to demonstrate that the EMNP meets the housing requirement set by the draft SDLP	Minor amendment
4.11	This sentence is not required. Neighbourhood Planning regulations allow communities to allocate sites for development through the Neighbourhood Planning Regulations, specific reference to SDNPA allowing sites of 6 is not necessary.	Delete paragraph 4.11
EM2	The title of this policy requires attention as the policy refers to development both in and outside the settlement policy boundary	Amend policy title to read 'Settlement Policy Boundary'
EM2	The Policy should clearly state that development outside the Settlement Policy Boundary will NOT normally be permitted. The policy could be more explicit about development outside the settlement policy boundary, in open countryside. The group should consider whether specific reference is made to the circumstances when development is appropriate.	Minor amendment to make clear that development outside the Settlement Policy Boundary will not normally be permitted
EM2	Reference to the SDNPA Local Plan should be amended as per the point made in general comments.	Minor amendment to reflect current status of SDLP
EM3	Reference to 'the overall mix of unit sizes in East Meon will be measured by the Annual Monitoring report' should be removed as the Authority Monitoring report will not monitor overall unit sizes for individual parishes	Remove reference to the Annual Monitoring report monitoring unit sizes in East Meon
Affordable Housing	Consider including a footnote for the affordable housing section to state what the current affordable housing threshold is set by the NPPG	Consider including a footnote to set out the threshold for affordable housing contributions.
4.18	Make specific reference to the National Planning Policy Framework and National Planning Practice Guidance in supporting text for affordable housing. Proposed text as follows....In order to comply with the national and local policy affordable housing will be provided on all development sites <u>that meet the requirements set out in the National Planning Policy Framework and National Planning Practice Guidance and be consistent with affordable housing policy in the East Hampshire Joint Core Strategy and emerging South Downs Local Plan</u>	Amend text as proposed.
4.20	The EMNP group should be commended for their attempt to direct some market housing to meet the needs of local people. The EMNP group could consider including the following text in the supporting text at 4.20... 'The Parish Council will seek to liaise with possible developers for the sites to promote this idea'	Consider including additional text as suggested.

4.23	Include reference to townscape and village character in the supporting text for policy EM5 at paragraph 4.23, as follows....Policy EM5 therefore requires that the Landscape impact (<u>including townscape</u>) of all new development is carefully assessed and mandates that development must contribute positively to the villages setting <u>and character</u> within the National Park, protecting the important views.....	Minor amendment to include reference to townscape and character in supporting text
4.24	The SDNPA understands that the EMNP group were keen to identify important views to be protected within the EMNP but have resisted this approach to avoid suggesting some views are more important than others. However, SDNPA would draw the group's attention to the SDNPA Viewshed study and the East Meon Settlement Context Study, both of which identify important views in and around East Meon. Specific reference to these two documents, and the views identified through public consultation should be included in the supporting text, or with specific reference in policy EM5. Please note that the settlement context study will not be published until autumn 2016	Include specific reference to the SDNPA Viewshed study and Settlement context study in supporting text for Policy EM5
EM5	Add the word assessing to the end of the final sentence in Policy EM5 introduction text, as follows.... 'Except where views are entirely localised, all development proposals must be accompanied by a Landscape and Visual Impact Assessment and must demonstrate low or negligible impact on landscape views, in particular <u>assessing</u> :'	Minor amendment
EM6	Policy EM6 is titled Layout and Form but it does not appear to deal with matters relating to layout and form. The current policy focuses on individual buildings and aspects of them. Consideration should be given to other matters relating to layout and form, including: distance from neighbouring properties, position on plot (which should be consistent with surrounding character), chimneys etc. Whilst the current policy deals with some matters of form and layout there appears to be no reference to the public realm or the spaces created between buildings.	Consider additional points to be included in EM6: Layout and Form.
EM9	Remove the word refer from the final sentence of Policy EM9 as follows.... Applications which refer or reflect the Pattern Book will be supported.	Minor amendment
EM10	The final four sentences of Policy EM10 are not necessary. It would be adequate for the policy to read as follows... The Local Green Spaces shown on the 'Map of Local Green Spaces' (figure 3 below) and in the table below will be protected for the benefit of the community. These have been found to be demonstrably special to the community through consultation. <u>These Local Green Spaces will be protected in accordance with the National Planning Policy Framework.</u>	Minor amendment
EM10	Policy EM10 sets out the proposals for Local Green Space designations in East Meon. The SDNPA supports the Parish in the identification and designation of important Local Green Spaces to ensure their protection in the long term. However, experience from previous Neighbourhood	Provide further justification to support the designation of Local Green Spaces in Policy EM10

	<p>Planning examinations has highlighted the importance of providing comprehensive justification for Local Green Space designations. Currently the table set out in support of Policy EM10 is likely to be inadequate for the purposes of designating Local Green Spaces. The EMNP group should refer to the specific requirements as set out in Paragraph 77 of the National Planning Policy Framework and provide justification against each criteria for each of the sites.</p>	
EM11	<p>Policy EM11, part C refers to development being permitted if it is for an alternative community facility, which could include affordable housing. Whilst the SDNPA commend the community for encouraging the delivery of affordable housing the Authority is highlighting this point to ensure the Parish Council and wider community are content with community facilities being replaced by Affordable Housing. It is worth noting that some affordable housing models may not remain affordable housing in perpetuity, so consideration should be given to whether replacement with affordable housing is appropriate.</p>	<p>Consider whether affordable housing is an appropriate alternative to community facilities.</p>
4.37	<p>Reference should be made in the supporting text to the Hampshire Minerals and Waste Plan 2013, specifically reference should be made to Policy 31 'Liquid waste and waste water management' to ensure that developers are aware of the relevant criteria for expansion of sewerage systems</p>	<p>Minor amendment</p>
4.43	<p>Paragraph 4.43 sets out the landscape analysis which has been used to inform the site selection process. However, the SDNPA would recommend that additional text is included in the introduction to the site specific policies which requires development to protect and enhance the intrinsic character of the village and its setting, as set out in the studies which are named in this paragraph. It would also be helpful to make specific reference to the South Downs Integrated Landscape Character Assessment here. This is important so that development is not just screened to mask any problems. Character is a key issue whether you can see it or not. Development has many other influences on character through movement, human activity, noise, vehicular traffic, highway engineering, loss of local features etc.</p>	<p>Additional text to reinforce the importance of protecting and enhancing the intrinsic character of the village and its setting in the South Downs National Park. Including specific reference to studies which have identified the importance of landscape character locally.</p>
EM14	<p>Bullet point 8 requires permitted development rights to be removed to ensure that dwellings remain appropriate to their location. This approach is generally supported by SDNPA. There is, however, potential that Classes other than those quoted (which include matters such as porches, hard surfaces, chimneys, fencing, antenna) may adversely impact on the character of an area and that some of the Classes quoted may not be specifically relevant to every case. The removal of permitted development rights by way of planning condition needs careful consideration in order to ensure that the condition meets the tests set out in national guidance. The clause could state: "During the planning application process, consideration will be given to the removal of relevant permitted development rights as contained within the Town and Country Planning (General</p>	<p>Consider rewording the policy clause relating to permitted development rights.</p>

	Permitted Development) (England) Order 2015, as amended to ensure that development is appropriate to the site and character of the locality.”	
EM15	Bullet point one to be reworded as follows....Development will accord with the <u>indicative</u> layout shown above in a cluster formation. It is suggested that the clause should allow for some flexibility in the layout to allow for landscape and design issues which may be identified in more detailed analysis of the site.	Minor amendment
EM15	Bullet point 7 requires the developer of site B2 to alleviate current drainage problems in Coombe road adjacent to the site. This is not appropriate, the policy could require the development to not exacerbate the drainage situation in adjacent sites but the policy cannot require this development to resolve existing issues.	Consider rewording the policy clause requiring the developer to alleviate existing drainage problems.
EM15	Bullet Point 8 to be amended as follows....A <u>bespoke</u> landscape and visual impact assessment <u>appraisal</u> will be required...	Minor amendment to reference the correct study for small scale development such as this site proposes
EM15	<p>The SDNPA is concerned with the explicit use / requirement for screen planting to mitigate visual impact. This approach suggests several things;</p> <ul style="list-style-type: none"> - That the development is in the wrong place - That poor design and inappropriate development can be made acceptable if you can't see it; and - That planting may not be consistent with local woodland and hedgerow patterns, therefore appearing as part of the development, thereby contributing to further problems of incongruous development <p>The SDNPA would suggest a preference for structure planning which is consistent with local landscape character. The following amendments to this policy are suggested....</p> <p>A <u>bespoke</u> landscape and visual impact assessment <u>appraisal</u> will be required and should inform the design and layout of the sites proposals and must show how the screen plating will mitigate the wider visual impact <u>incorporate a scheme of structure planting which is consistent with the local landscape character in order to integrate the development appropriately within its landscape setting</u></p>	Minor amendment and additional text to ensure appropriate planting in new development
EM15	Bullet Point 9 to include the following text.....The Proposal must be accompanied by a desk based Archaeological Investigation <u>with more comprehensive investigation should this be necessary.</u>	Minor amendment
EM15	Bullet point 10 requires permitted development rights to be removed to ensure that dwellings remain appropriate to their location. This approach is generally supported by SDNPA. There is, however, potential that Classes other than those quoted (which include matters such as porches,	Consider rewording the policy clause relating to permitted development rights.

	<p>hard surfaces, chimneys, fencing, antenna) may adversely impact on the character of an area and that some of the Classes quoted may not be specifically relevant to every case. The removal of permitted development rights by way of planning condition needs careful consideration in order to ensure that the condition meets the tests set out in national guidance. The clause could state: “During the planning application process, consideration will be given to the removal of relevant permitted development rights as contained within the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended to ensure that development is appropriate to the site and character of the locality.”</p>	
EMI6	<p>Bullet point one to be reworded as follows....Development will accord with the <u>indicative</u> layout shown above in a cluster formation. It is suggested that the clause should allow for some flexibility in the layout to allow for landscape and design issues which may be identified in more detailed analysis of the site.</p>	Minor amendment
EMI6	<p>Bullet point 6 requires permitted development rights to be removed to ensure that dwellings remain appropriate to their location. This approach is generally supported by SDNPA. There is, however, potential that Classes other than those quoted (which include matters such as porches, hard surfaces, chimneys, fencing, antenna) may adversely impact on the character of an area and that some of the Classes quoted may not be specifically relevant to every case. The removal of permitted development rights by way of planning condition needs careful consideration in order to ensure that the condition meets the tests set out in national guidance. The clause could state: “During the planning application process, consideration will be given to the removal of relevant permitted development rights as contained within the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended to ensure that development is appropriate to the site and character of the locality.”</p>	Consider rewording the policy clause relating to permitted development rights.
EMI7	<p>There is a concern from the SDNPA that this site has the potential (if badly designed) to be a prominent mistake (in planning and design terms) particularly given its elevated position and wooded nature. The SDNPA recommend that further thought is given to green infrastructure planning for this site and how green infrastructure could link with site B2. It is worth noting that green infrastructure is not public open space, it should be a planned network of connected routes, networks and functions. The consideration of green infrastructure on B9 and B2 could propose an additional public right of way or permissive path along the southern side of the village to provide a connection for residents and visitors to access the new developments along the southern edge. This public right of way, if correctly implemented could also provide a biodiversity corridor, connecting pockets of natural space and public open space on the southern edge of the settlement. This would involve discussion with the landowners but the opportunity</p>	Recommend that further consideration is given to green infrastructure proposals for site B9 and potential links to green infrastructure on site B2. It would also be a good opportunity to create new footpaths for residents and visitors to connect the southern edge of the settlement to other existing public rights of way.

	exists to provide important biodiversity connections and a new route for residents and visitors to access new developments and other facilities in the village.	
EMI7	Bullet point 3 to be amended as follows....A <u>bespoke</u> landscape and visual impact assessment appraisal will be required...	Minor amendment
EMI7	Bullet Point 9 to include the following text.....The Proposal must be accompanied by a desk based Archaeological Investigation <u>with more comprehensive investigation should this be necessary.</u>	Minor amendment
EMI7	Bullet point 11 requires permitted development rights to be removed to ensure that dwellings remain appropriate to their location. This approach is generally supported by SDNPA. There is, however, potential that Classes other than those quoted (which include matters such as porches, hard surfaces, chimneys, fencing, antenna) may adversely impact on the character of an area and that some of the Classes quoted may not be specifically relevant to every case. The removal of permitted development rights by way of planning condition needs careful consideration in order to ensure that the condition meets the tests set out in national guidance. The clause could state: "During the planning application process, consideration will be given to the removal of relevant permitted development rights as contained within the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended to ensure that development is appropriate to the site and character of the locality."	Consider rewording the policy clause relating to permitted development rights.
EMI7	Bullet Point 14 requires further clarification. Currently the policy suggests that land ownership for the whole site is to be transferred to a public body to secure its provision as green infrastructure. Surely a part of the site is to be used for residential development, is the intention of this clause to ensure the remaining land, other than that developed for residential is transferred to a public body to ensure its provision as Green Infrastructure. Consideration should also be given to the opportunities for Green Infrastructure planning on site B9 and B2. There is a real opportunity for the EMNP to provide a new route to connect the southern edge of the settlement (including the allocated sites) to existing public right of way network and other facilities in the village.	Consider rewording of policy clause (bullet point 14) Consider opportunities to further develop Green Infrastructure proposals for site B2 and site B9