

SDNPA response to East Meon Submission (Regulation 16) Neighbourhood Development Plan

Ref	Comment	SDNPA Recommendation
<b>General Comments</b>		
N/A	<p>The progression of the East Meon Neighbourhood Development Plan (EMNDP) to submission stage is to be welcomed, it's the result of a considerable amount of hard work by the Parish Council and the wider community.</p> <p>The EMNDP group should be congratulated for so effectively reflecting the aspirations of local people in the allocation of land for housing and local green spaces. Finding the balance between meeting local aspirations and working within the constraints of planning in a protected landscape is challenging and the EMNDP group have succeeded in meeting this challenge. This is particularly relevant in East Meon, which is pictured on the front cover of the English National Parks and the Broads UK Government Vision and Circular 2010.</p> <p>The EMNDP group should also be congratulated on developing a plan which focuses on key issues affecting East Meon, relying on other plans, such as the South Downs Local Plan to cover more strategic issues.</p>	N/A
N/A	<p>Throughout the EMNDP there are specific references to the South Downs Local Plan: Preferred Options. This reference, although accurate at the time, will be out of date as the South Downs Local Plan progresses to the Pre Submission version in autumn 2017. The SDNPA appreciate that the EMNDP group are keen to recognise the South Downs Local Plan (SDLP), and its future status in relation to the EMNDP, however, it is likely that policies references will change as the SDLP progresses so reference should be more general. Policy references can be updated once the SDLP is adopted and the policy numbers are confirmed.</p>	Replace references to specific policies of the SDLP with a general reference to the South Downs Local Plan policies.
<b>The purpose of the Neighbourhood Development Plan</b>		
Section 1.8 (Bullet point 1)	A minor text amendment is required to clarify that the plan identifies key view types which need to be protected.	Identifying key views <u>types</u> to be protected...
Section 1.8 (Bullet Point 2)	A minor text amendment is required to clarify that this statement is referring to the Settlement Policy Boundary to avoid confusion with the village or parish boundary	Revising the village settlement <u>policy</u> boundaries.
<b>Habitats Regulation Assessment</b>		
Section 1.21	To support the statement set out in section 1.21 the screening opinion provided by SDNPA supported by Natural England should be included in the evidence base.	Include HRA screening opinion in evidence base

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<b>Section 2 Parish Profile</b>		
Section 2.1	Additional text should be added to the introductory paragraph to highlight the fact that the South Downs Way National Trail runs through the East Meon Parish	Include a reference to the South Downs Way national trail passing through the parish.
Section 2.9	Amend reference to the South Downs Local Plan: Preferred Options to refer only to the South Downs Local Plan	The SDLP: <del>Preferred options</del> identifies.....
Section 2.9	The SDNPA requested that reference was made to the Broad Spatial Area which East Meon is located in at Pre Submission consultation. However, since that there have been further modifications to the South Downs Local Plan in preparation for publishing the Pre Submission version of the SDLP. Therefore it is recommended that more general reference to the SDLP is used here. It is appropriate for the EMNDP to identify its location in the Dip Slope but reference to the SDLP should be more general and the text updated to reflect changes to the description of the Dip Slope broad area.	The SDLP: <del>Preferred Options</del> identifies five broad areas <u>and four river corridors</u> of the South Downs National Park ( <del>see pages 37-49 of SDLP: Preferred Options</del> )-East Meon falls within the Dip Slope, <del>to which the draft Core Policy SD4 of the SDLP: broad area Preferred Options applies.</del> The Dip Slope <del>contains iconic South Downs Landscapes and some of the most tranquil areas and darkest night skies in the National Park area has a rich cultural heritage and historical features.</del> The broad area is also <u>home to the river Meon and its high quality habitats which support a range of protected specific including water vole and otter.</u>
<b>Section 3 Our Vision</b>		
	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
<b>Spatial Strategy</b>		
Section 4.6	Reference to core policy SD1 of the South Downs Local Plan: Preferred Options should be amended to a more general reference to the South Downs Local Plan as Policy numbers are likely to change as the SDLP progresses to Pre Submission and adoption	<del>Core Policy SD1 of t</del> The South Downs Local Plan: <del>Preferred Options</del> provides the development plan policy for sustainable development. The East Meon approach to its Neighbourhood Development Plan adheres to the core <u>policyies</u> of the South Downs Local Plan

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<b>Housing Provision</b>		
Section 4.9	Additional wording to provide clarification as to the intention of the policy.	<del>Policy SD23 of the</del> The emerging South Downs Local Plan: Preferred Options indicates that East Meon should allocate <u>sites to accommodate</u> 15 new homes.....
<b>Policy EM1</b>		
<b>East Meon Housing Allocation to 2032</b>		
	The policy wording refers to approximately 15 new homes being built in East Meon in the plan period. However the policy allocates sites to deliver 17 new homes. The policy should be consistent in terms of the housing allocation. It is recommended that the policy refers to approximately 17 new homes being built in East Meon during the plan period.	Planning Permission will be granted for approximately <del>+5</del> <u>17</u> new homes to be built in East Meon.....
	Reference to Policy SD23 of the South Downs Local Plan should be removed. The current policy requirement relevant to East Meon’s NDP is the Joint Core Strategy Policy CP10 requirement for East Meon to allocate sites to provide a proportion of the ‘100 dwellings at other villages in the National Park’	.....to meet <del>policy SD23 of the South Downs Local Plan: Preferred Options</del> <u>Policy CP10 of the East Hampshire Joint Core Strategy</u> ....
	The table listing East Meon’s Housing Allocations states that each allocation is a maximum no. of homes. Throughout Policy EM1 the allocation is referred to as an approximate or ‘development of up to, and including’. Policy wording should be consistent, it is recommended that the table heading refers to an indicative no. of homes	<del>Maximum</del> <u>Indicative</u> no. of homes
Site A3	The Development brief for site A3 on page 35 states that the site is expected the provide two units for affordable social rent, this should be set out clearly in Policy EM1 to identify this allocation as providing affordable housing	2 ( <u>affordable homes</u> )
<b>Policy EM2</b>		
<b>The Settlement Policy Boundary</b>		
Figure 2	The map shown at Figure 2 describes the Proposed and Existing Settlement Policy Boundary for East Meon. Figure 2 appears to omit sites B3 and B4 from the map, and does not show any amendment to the Settlement Policy Boundary to incorporate these sites. It is recommended that Figure 2 shows the boundary extending to sites B3 and B4. This extension should not include the large gardens between the existing Settlement Policy Boundary and sites B3 and B4. The new boundary should be drawn tightly around the properties between the current	Make appropriate amendments to figure 2 and figure 5 (proposals map) to show the settlement policy boundary extending to sites B3/B4

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	Settlement Policy Boundary and site B3/B4.	
	Currently the policy refers to the NPPF, JCS and saved policies of the 2006 East Hampshire Local Plan. This could be simplified by referring to the Development Plan, which will include all of the relevant development plan documents a footnote can be included to describe what documents make up the development plan.	.....that complies with the policies in <del>this Plan, the NPPF, the JCS, the saved policies of the East Hampshire Local Plan 2006 and the South Downs Local Plan</del> <u>the Development Plan</u> will be permitted...
	The policy currently refers to development outside the Settlement Policy Boundary only being allowed for sites allocated in this plan or in exceptional circumstances. Pending a successful examination and referendum the Settlement Policy Boundary will be redrawn to include the site allocated in the EMNDP therefore the policy should be reworded as set out in the SDNPA recommendation.	...will not be permitted <del>apart from on the proposed sites allocated in this Plan, or in other than in</del> exceptional circumstances in accordance with <del>policy SD22 of the South Downs Local Plan: Preferred Options</del> <u>the Development Plan</u> , or <del>including for</del> <u>essential</u> ...
<b>Policy EM5</b>	<b>Protection of Valued Views</b>	
	The Policy as currently worded is confusing, the SDNPA recommend some minor modifications to wording to improve the policy and make the policy intention clearer	...not cause an adverse impact <del>or diminution of significant views that currently provide open aspects or views both from within and outside the village or other open spaces.</del> Except where....
Bullet point b	As currently worded this part of the policy is confusing, the SDNPA propose some minor modifications to wording to improve the policy and make the policy intention clearer	Views from publically accessible areas <del>which are within, to and from settlements</del> which contribute to the viewer's enjoyment....
4.27 third sentence	Minor amendments to supporting text.	Accordingly, in considering the location of <del>potential</del> housing sites, it <del>will be</del> <u>is</u> important to minimise any impact....
<b>Policy EM8</b>	<b>Outbuildings and Enclosures</b>	
	This policy requires all new development to have enclosed front and rear gardens. In addition one of the allocated sites also requires the provision of alternative parking and storage space. Whilst the SDNPA are generally supportive of this approach there is concern at how all these policy provisions could be achieved in the very limited space of site A3	Consider whether it is appropriate to require front and rear gardens on all new dwellings.
	<b>Local Green Spaces supporting text</b>	

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4.32	The correct term Local Green Space should be used in supporting text and policy as this is a formal designation as set out in the NPPF	<u>Local</u> green spaces can enhance....
4.32	Minor amendment to supporting text	Additionally, maintenance and preservation of appropriate valued, open space....
4.33	Minor amendment to supporting text	Neighbourhood development plans can designate <u>Local</u> green space where....
4.35	Minor amendment to supporting text	Provision of <u>Local</u> green space goes beyond....
<b>Policy EM10</b>		
<b>Local Green Spaces</b>		
	The policy as currently worded sets out how the planning authority should consider applications which may have an impact on Local Green Spaces, this is not necessary as the National Planning Policy Framework sets out clearly how the designation of Local Green Spaces should be considered in the determination of planning applications. The SDNPA propose some minor amendments to the policy wording to improve the policy	Development will not be permitted on Local Green Spaces except in very special circumstances (consistent with NPPF Paragraphs 87 & 88. <del>When considering any planning application, the local planning authority should ensure that substantial weight is given to the protection of Local Green Space. 'Very special circumstances' will not exist unless the potential harm to the Local Green Space by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</del> Justification for designation of the Local Green Spaces.....
Supporting table	The heading of column one refers to sites proposed as Local Green Spaces, SDNPA recommend that the word proposed is removed,	<del>Sites proposed as Local Green Space</del> <u>Local Green Spaces</u>
4.37	Minor amendment to policy wording	Policy EM10 provide protection for <del>respectively</del> , open spaces, including allotments...
<b>EM11</b>		
<b>Retention of Community Uses</b>		
Part c	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	Consider whether affordable housing is an appropriate alternative to community facilities.

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	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.	
<b>Policy EMI 4</b>	<b>Site A3: Land off Hill View</b>	
Bullet point 8	This part of the policy requires the development to provide alternative parking/storage facilities near to the site. Is there any consideration to where this may be provided? The SDNPA seek assurance that this provision does not cause harm to the setting of the village.	Consider the inclusion of this requirement within the policy
EMI4	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, 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.
<b>Policy EMI 5</b>	<b>Land at B3/B4 (Coombe Road)</b>	
Bullet point 1	It is suggested that the policy 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.	Bullet point one to be reworded as follows....Development will accord with the <u>indicative</u> layout shown above in a cluster formation.....
Bullet Point 9	Bullet point 9 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	Consider rewording the policy clause relating to permitted development rights.

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	<p>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>	
<p>Bullet point 10</p>	<p>The intention of this policy is not clear as currently worded. If the policy is seeking to limit the height of the development this should be stated.</p>	<p>Consider whether the policy clause is required</p>
<p><b>Site B2</b></p>	<p><b>Land south of Coombe Road</b></p>	
<p>Figure 7</p>	<p>The diagram includes an area identified as a No Build Zone which is described at Bullet Point 11 of Policy EM16. The indicative layout and description are unclear. The diagram and text should clearly set out the developable area and any area set out for landscaping to mitigate the visual impact of the development. The current wording of policy would not allow for appropriate landscaping as the area is reserved for agricultural use only. The land identified as no build zone would be required for landscaping and potentially the surface water drainage measures set out in Policy EM16. The policy also required the scheme of mitigation (Landscaping) to be maintained by the land owner, it needs to be clear whether this is an existing landowner of the new property owners.</p>	<p>Provide a clear plan of the area allocated for the housing development. The diagram should also show the area designated for landscaping and flood mitigation measures. The policy should state who is responsible for the maintenance of any mitigation scheme</p>
<p><b>Policy EM16</b></p>	<p><b>Land at B2 (South of Coombe Road)</b></p>	
<p>Bullet point 12</p>	<p>Bullet point 12 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>	<p>Consider rewording the policy clause relating to permitted development rights.</p>

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<b>Policy EMI 7</b>	<b>Land at B9 (Corner of Coombe Road)</b>	
Bullet point 5	There is no justification for this requirement, the introductory text should set out why this site requires this particular policy	Provide further clarification and justification for this policy requirement
Bullet Point 10	There is no justification for this element of the policy in the introductory text. If mitigation is required for a particular reason this should be set out clearly in the introductory text	Provide justification for the policy requirement relating to Biodiversity mitigation
Bullet Point 11	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.
General	SDNPA Planning Committee requested that in regard to site B9 it would be more appropriate for the access route to avoid the vegetation and should have a curved approach; this would also allow the access to be in keeping with other access in the immediate vicinity.	Amend the indicative layout provided at Figure 8 to show a curved access to the site