



## Summary of Representations made on the Regulation 16 Submission version of the Amberley Neighbourhood Development Plan

1. This document provides a summary of the representations submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 to the Amberley Neighbourhood Development Plan (FNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. The South Downs National Park Authority (SDNPA) published the ANDP for consultation from 6 September to 18 October 2016 in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012. Representations were submitted during the publicity period by 11 respondents. The representations were received from statutory consultees, developers, their agents, and other organisations.
3. Paper copies of the representations can be viewed on request at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH.
4. Set out below is a summary of the issues raised in the representations. The South Downs National Park Authority Representation can be seen in full on our website by following this [link](#)

Name / Organisation	Date received	Method of submission	Summary of representation
Amberley Society	18.10.2016	email	<p>(Representation in full)</p> <p>The Amberley Society supports the Amberley Neighbourhood Development Plan and all of the policies contained within it. We applaud the work of Amberley Parish Council and the Neighbourhood Plan Steering Committee for their comprehensive public engagement and work in producing the plan. We believe it will help protect and conserve the village and yet bring about long lasting benefits to our community.</p> <p>We wish to make the following comments:</p> <p>Amberley Neighbourhood Plan 3.0 ABOUT AMBERLEY PARISH paragraph 6 and elsewhere:</p> <p>For Amberley Wildbrooks we would like to see included all designations. As well as SSSI and RAMSAR it is also SAC (Special Areas of Conservation), SPA (Special Protection Area) and SCI (Sites of Community Importance). Appropriate weight should be given to the SPA international designation because of its</p>

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			<p>relevance in NPPF 113.</p> <p>ANDP Basic Conditions Statement, Compatibility with EU Legislation 5.2 This statement is incorrect as Amberley Wildbrooks is designated as an SAC site, as stated above.</p> <p>Amberley Neighbourhood Plan 3.1, History Edward Stott is quoted to be a Royal Academician, he was not. He was an ARA, Associate member.</p> <p>Amberley Neighbourhood Plan 3.4, Environment and Heritage, The Wildbrooks Paragraph 3 states that the site is used for haycropping. It has not been used for this purpose for many years since it has been cut for silage.</p> <p>Amberley Neighbourhood Plan 3.7, Employment and Enterprise Paragraph 1 quotes the pottery being located in a former United Reformed Chapel. It was a former Congregational Chapel.</p> <p>Amberley Neighbourhood Plan 3.8, Community Facilities and Wellbeing, Secondary School. The proposed change from the three-tier structure has now been approved. Amberly First School will add a Year 6 (10-11 years) cohort, and the children will then move to one of the secondary schools at the age of 11.</p> <p>Amberley Neighbourhood Plan, POLICY EN1 Natural environment Paragraph 3. Designations SAC and SCI should be added.</p> <p>We hope that the above comments will help to ensure greater accuracy and robustness of the ANDP.</p>
Historic England	18.10.2016	email	No comments to make on the plan.
The Parham Estate	18.10.2016	email	<p>The Estate is a key landowner in the Parish and retains an important interest in its future of development.</p> <p>Following discussions with the Parish Council the Estate submitted a potential development scheme for the land opposite the Sportsman's pub on Rackham Road to the draft Neighbourhood Plan for consultation. The site was considered suitable for development in the background housing report and it is a surprise that the site</p>

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			<p>has now been allocated as Local Green Space.</p> <p>The Estate strongly object to this allocation and do not believe that it meets the strict requirements of NPPF paragraph 76-77 to allow the Parish Council to bring it forward.</p> <p>The Estate believes that there should be more than one housing allocation in the Plan and that the site should therefore be included as another housing allocation. It proposes the potential development of three dwellings that would allow the use of part of the land for car parking for the pub. This would alleviate current parking pressures on Rackham Road and address both the housing need for the Parish and the identified parking issues in this area.</p> <p>The Estate would urge the Inspector to remove the land opposite the Sportsman's pub on Rackham Road from the Local Green Space designation and instead allocate it for housing development.</p>
Horsham District Council	18.10.2016	email	<p>The District Council is objecting to the following policies within the Neighbourhood Plan because of the impact on land within the District Council's ownership:</p> <p>EN7- Local Green Space</p> <p>Horsham District Council objects to the proposed designation of "Top Field" as Local Green Space. HDC disputes the reasoning for the designation of this site. The District Council is required by the government to make the best use of land within its ownership and as a consequence it is possible that this land may be required for other uses during or beyond this plan period. Secondly, the land is currently used as grazing land and does not have any public access and therefore has limited community and amenity value.</p> <p>Policy FI 1- Create a car park and Policy / FI 2 – Build a joint use school/community Hall</p> <p>The District Council objects to both these policies. The Local Government Act 1985 (as amended) requires local authorities to achieve the best return from the sale of assets. The Localism Act 2011 and Local Government Act 2000 established a set of value for money principles and accountability to local communities that the council must follow. In doing so the council has an obligation to continuously improve its services and value to the council tax payer.</p> <p>The Neighbourhood Plan proposes to allocate part of some land within the Council's ownership for car parking and a school/community hall. The District Council accepts that there is a need for additional car parking in the village and does not dispute the need for a community/school hall. Due to financial constraints these facilities cannot be provided on the land within the Council's ownership without some form of additional enabling development to assist with the funding for the provision of the car parking and hall. Policies FI 1 and FI</p>

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			<p>2 are not deliverable as drafted and should therefore be removed from the Neighbourhood Plan.</p> <p>Policy FI 5 – Allocate land for a community orchard allotments</p> <p>Horsham District Council objects to this policy. The policy intends to allocate land in the District Council's ownership for a community orchard and allotments. The District Council has not been approached by the Parish Council regarding the availability of the land for this purpose. The land is currently leased out by the District Council for grazing and is therefore not available for alternative uses. Policy FI 5 cannot be implemented.</p> <p>Policy HD6 Housing site allocation</p> <p>The District Council has reviewed the evidence base which has resulted in the land next to Newland Gardens being allocated for residential development. The Site Assessment Sheet makes assumptions that the land owned by the District Council will be designated for alternative uses and is not suitable for residential development. The Site Assessment Sheet states in the case of site 4 (Bottom Field) that development would have a "considerable impact" on views from the South Downs Amberley Mount, but the Proposals Map shows this land as being allocated for development for a school/community hall, car park and toilets. This is contradictory and in the Council's view demonstrates discrepancies in the way in which the site assessment exercise has been undertaken. The land owned by the Council is adjacent to the existing Built-up Area boundary and therefore this does much to commend it as suitable for a limited amount of development.</p>
Tim Ashby	14.10.16	email	<p>(Representation in full)</p> <p>I wish to commend the submission document of the Amberley Neighbourhood Plan for approval. The Amberley Parish Council has gone to great efforts to involve the whole community of the parish, and Amberley has responded in its usual proactive way. The council has presented its conclusions in the appropriate formal arrangement, while ensuring that the document is clear and easy to follow for those not familiar with such formalities; and then encouraged and taken account of comments from all sections of the community.</p> <p>I know from my own experience that this involves a lot of effort. I was chairman of the steering group which developed PADS, the Parish of Amberley Design Statement, which has been widely commended and has frequently been helpful in preparation of planning applications and in responding to applications. The team developing the Neighbourhood Plan has ensured that everyone has had many opportunities to comment on all aspects. They have given good guidance on what is relevant and what is not relevant to planning matters, and the implications of decisions. They have listened to the quiet people as well as those who shout loudest.</p>

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			This is a Neighbourhood Plan for the community, which has come from the community. It should be approved.
Environment Agency	14.10.2016	email	We are pleased to see that the proposed allocations for housing and the school/community hall as detailed on the Proposals Map page 40 have been directed to the areas at the lowest probability of flooding and that they are located within Flood Zone 1.
James Tolson	13.10.2016	Email	<p>(Representation in full)</p> <p>The Amberley Neighbourhood Plan represents a major achievement by the Parish Council who should be congratulated on its production which represents a significant amount of work and good involvement with the community.</p> <p>In general I support it but (and there is always a but) I must take issue with a one policy and some errors of fact.</p> <p>Policy HD 9 (para 5) Photo-Voltaic panels, and other devices using solar energy for domestic purposes will be approved on a case-by-case basis, but must not detract from the character of the area. They should not be visible from roads, paths or in views from the Downs or the Wildbrooks.</p> <p>This policy effectively bans PV panels from the parish as it is almost impossible to site them where they cannot be seen. Indeed there are already several perfectly acceptable installations which fail this test. This may be academic for, as far as I know, permission is not required outside Conservation Areas or on listed buildings.</p> <p>Section 3 Page 9 The settlement of North Stoke, with 15 dwellings Not true - it has only 12 dwellings.</p> <p>Section 3.6 Getting Around page 16 There are no parking restrictions in the parish. Not true – there are yellow lines and seasonal parking restrictions at Houghton Bridge.</p> <p>Policy GAI refers to the existing footpath and cycle path network. There is no existing cycle path network as is stated in section 3.6 Getting Around on page 16!</p>

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			<p>P 18 - O2 is the only network with a close to acceptable service.</p> <p>Not true – we have good reception from Vodaphone at Houghton Bridge.</p>
Highways England	10.10.2016	email	We have reviewed the document and do not wish to make any comments.
Southern Water	20.9.2016	email	<p>Policy EN7 of the Amberley Neighbourhood Development Plan (NDP) does not meet the basic conditions necessary for a NDP, namely to: be in general conformity with the strategic policies contained in the development plan for the area of the authority, to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.</p> <p>Accordingly, to meet the basic conditions necessary for a NDP, we propose the following amended wording to policy EN7 (new wording underlined):</p> <p>Proposals for the development of these areas will not be permitted, <u>other than in very special circumstances, for example, it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.</u></p>
South Downs National Park	18.10.2016	Via Planning Committee	<p>Policy FI 1      Create a Car Park</p> <p>The SDNPA welcomes the inclusion of FI 1.5 stating the new car park would be subject to a design brief to be agreed between the Parish Council and SDNPA. Nonetheless, an approximate size and capacity of the car park should be specified in the policy or the supporting text to ensure that the general parameters are established.</p> <p>Policy FI 2      Build a Joint-use School/Community Hall</p> <p>The SDNPA welcomes the inclusion of FI 2.6 stating the new building would be subject to a design brief to be agreed between the Parish Council and SDNPA.</p> <p>Policy FI 4      Surface Water Management</p> <p>The supporting text could be amended to indicate that Sustainable Drainage Systems may be appropriate except in areas with a high water table. WSCC may be able to offer appropriate wording.</p> <p>Also, could the requirement for SUDS also refer to a Green Infrastructure (GI) approach whereby they form part of a cohesive network which combines all of these elements together - i.e. multifunctional landscapes.</p>

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			<p>Policy GA2 Pedestrian footways</p> <p>Are there key routes that should be safeguarded to ensure that any new development does not result in the loss of an opportunity for improvements to be made?</p> <p>Could policies GA1 and GA2 be combined?</p> <p>A map identifying these key routes might be helpful.</p> <p>Policy GA4 The SDNPA would encourage reference to the 'Roads in the South Downs' report in the supporting text of Policy GA4. This document should provide guidance to those involved in traffic management</p> <p>Minerals &amp; Waste The Amberley NDP does not raise any significant minerals and waste planning issues, however, we would like to take this opportunity to request for the West Sussex Waste Plan (2014), the Minerals Local Plan (2003) and the emerging West Sussex Joint Minerals Local Plan to be referred to in this Neighbourhood Plan. This is particularly important because a large proportion of the Amberley Neighbourhood Plan area is covered by a Mineral Consultation Area (MCA). Suggest the plan includes a section on Minerals and Waste, referencing the Joint Minerals Plan and the need for consultation and possible safeguarding of minerals.</p>
Philip Greenwood	18.10.2016	Online	<p>(Representation in full)</p> <p>I welcome and endorse the Vision for Amberley which, in my view, accurately reflects the aspirations of the local community and forms the basis for a well-considered set of policies and proposals that will contribute significantly to the social, economic and physical wellbeing of the Parish.</p> <p>I welcome the stated objectives of the Neighbourhood Plan will believe that they will support the future growth and development of the Parish. However, I consider that the absence of a specific objective to protect key open spaces could potentially undermine an important element of emerging Local Plan policy. This could be remedied by the inclusion of the following additional objective:</p> <p>"Safeguard and protect local open spaces from inappropriate development"</p> <p>Policy FI I Create a car park</p> <p>I welcome the proposed creation of a car park on part of the Proposal Site and believe that it would support the sustainable development of Amberley Village. I also accept that the preparation of a Design Brief could provide useful guidance on such matters as layout, surface materials and boundary treatment. However, I</p>

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			<p>believe that the absence of specific policy guidance with respect to the size and capacity of the car park creates uncertainty about the impact of development on this important open space, and the setting of the Village, taking account of the fact that the Proposal Site extends over an area significantly greater than that required to meet local parking demand, thus undermining emerging Local Plan policy.</p> <p>Policy FI 2 School / community hall. This would make a significant contribution to community facilities within the Parish and help to sustain its social infrastructure.</p> <p>Policy HDI – The presumption in favour of development. Rewording the Policy "The presumption in favour of sustainable development" would more accurately reflect National Policy guidance. In addition, the insertion of the words "...unless material considerations indicate otherwise" after "...will be approved" in the first sentence of para HDI.1 would ensure consistency with statutory requirements.</p>