

Report to	Planning Committee
Date	9 March 2017
By	Director of Planning
Title of Report	SDNPA response to Submission (Reg 16) consultation on the East Meon Neighbourhood Development Plan (EMNDP)
Purpose of Report	To agree the content of the South Downs National Park Authority's (SDNPA) representation to the Independent Examiner

Recommendation: The Committee is recommended to: Agree the table of comments as set out in Appendix 2 of the report which will form SDNPA's representation to the Independent Examiner of the EMNDP.

1. Introduction and Summary

- 1.1 The SDNPA actively promotes and supports community led plans, particularly Neighbourhood Development Plans (NDP) where growth needs to be accommodated and planning issues exist.
- 1.2 On adoption, NDPs form part of the development plan for the neighbourhood area, alongside the strategic planning policies which are prepared by the SDNPA.
- 1.3 East Meon Parish Council (EMPC) is the 'qualifying body' with responsibility for preparing the EMNDP.
- 1.4 EMPC submitted the EMNDP (**Appendix 1**) to the SDNPA for examination on 18 January 2017. A 6 week publicity period commenced on 27 January 2017 and runs until the 10 March 2017, during which time local residents and other stakeholders are invited to submit representations to the Plan's Examiner.
- 1.5 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. The SDNPA commend the Parish Council and wider community on the production of the Submission version of the EMNDP.
- 1.6 The SDNPA's comments (**Appendix 2**) were prepared using input from SDNPA officer's and sets out the proposed representation to be submitted to the examination of the EMNDP.

2. Background

- 2.1 The EMNDP covers the plan period from 2016 - 2032 and has been prepared for a designated neighbourhood area which follows the East Meon parish boundary. The whole parish of East Meon is within the South Downs National Park. The area was designated by SDNPA on 3 September 2014. The area designation map is attached as **Appendix 3**.
- 2.2 The idea of preparing an NDP was discussed at the East Meon Parish Assembly in 2013. Following the decision to prepare a NDP an interactive public open day was held on 23 January 2014 to engage further interest from the wider community. This event invited the community to identify possible locations for housing development, important views and

valued amenities. The public open day also gave residents an opportunity to discuss any concerns which had been identified through the household questionnaire which had been distributed to every household in the village, with a 21% response rate. Further updates were provided at Parish Assemblies in 2014, 2015 and 2016; each of these events attracted over 100 attendees. The EMNDP group have carried out extensive consultation in addition to the formal consultation required by Neighbourhood Planning regulations. More detail of the community consultation can be found in the [Consultation Statement](#).

- 2.3 East Meon Parish Council led the process of preparing the EMNDP delegating the main task of preparing the NDP to a steering group of local residents and Parish Councillors. The steering group established a number of working groups to compile the evidence base, engage the wider community and to test the suitability and acceptability of proposed policies and land allocations. The SDNPA has supported the Parish Council throughout the process, attending steering group meetings, public events and providing feedback on proposals (Pre Submission) in line with our duty to support the preparation of NDPs.
- 2.4 The Pre Submission consultation was launched on 14 May 2016 and ran for 6 weeks to 25 June 2016 as is required by the Neighbourhood Planning (General) Regulations 2012. The Pre Submission consultation was publicised by a leaflet drop to all households in the village and advertised on village notice boards and the NDP website. During the Pre Submission consultation period two drop in sessions were held in the Village Hall to allow the community to seek clarification on any matters and to allow those without internet access to review the EMNDP. The [SDNPA response](#) to the Pre Submission consultation was prepared by officers and agreed through delegated authority to the Director of Planning. The SDNPA response focused on some minor textual amendments to policy wording to ensure the policies were robust. The SDNPA response also requested that further detail was added to individual development briefs in relation to the removal of permitted development rights. The majority of amendments requested by the SDNPA were made by the NDP group.
- 2.5 The Submission version of the EMNDP addresses many of the issues which were raised at Pre Submission consultation. Most of the comments raised at this stage (Submission consultation) relate to minor corrections and amendments. There are however, a number of outstanding more significant issues relating to removal of permitted development rights and incorrect references to policies in the South Downs Local Plan.
- 2.6 The SDNPA representation found at **Appendix 2** will be submitted to the independent examiner following approval at Planning Committee, the deadline for Submission comments is 10 March 2017.

3. Submission and Examination

- 3.1 The SDNPA is required under the Town and Country Planning Act 1990 (as amended) to support communities in the preparation of Neighbourhood Development Plans, this includes taking the plan through the process of independent examination.
- 3.2 All representations made on the EMNDP, including those of the SDNPA, are collated by the SDNPA and passed to an independent examiner to consider as part of the examination of the EMNDP. The independent examiner for the Neighbourhood Plan is required to consider whether the EMNDP meets the “Basic Conditions” set out in law under the Localism Act 2011. In order to meet the Basic Conditions, a Neighbourhood Plan must:
 - Have regard to national policies and advice contained in guidance issued by the Secretary of State
 - Contribute to the achievement of sustainable development
 - Be in general conformity with the strategic policies of the development plan for the area; and
 - Be compatible with EU obligations and human rights requirements.

- 3.3 The SDNPA formal representation to the EMNDP submission consultation is set out in **Appendix 2**. The following key points and overarching issues are raised in the representation:
- 3.4 Throughout the East Meon NDP there are specific references to policies of the South Downs Local Plan: Preferred Options. Whilst the SDNPA welcomes the EMNDP group's intention to recognise these policies, the policy references will be incorrect once the Pre Submission version of the SDLP is published. Therefore the SDNPA are recommending that the EMNDP provides more general references to the SDLP. Specific policy references can be added once the SDLP is adopted and a review of the EMNDP is carried out.
- 3.5 The EMNDP has prepared a revised Settlement Policy Boundary at Policy EM2 which is presented at Figure 2 of the EMNDP. As currently shown the revised boundary does not show two of East Meon's proposed housing allocations (B3 and B4). The SDNPA have recommended that Figure 2 and the Proposals Map (Figure 5) are amended to include sites B3 and B4. The amended Settlement Policy Boundary should be drawn following the SDNPA Methodology on Settlement Policy Boundary, which East Meon have already used to adjust the Settlement Policy Boundary. This amendment can be made during the examination in agreement with the EMNDP Independent Examiner.
- 3.6 All of the sites proposed in the EMNDP include site specific policies. One of the requirements set out in the site specific policies (for all sites allocated in the EMNDP) is for the removal of certain permitted development rights. The SDNPA are concerned that there is potential for other classes, other than those quoted, to adversely impact on the character of the surrounding area. Therefore the SDNPA are recommending alternative wording which allows for proper consideration of the removal of certain permitted developments at the Planning Application stage. This wording should provide the EMNDP group reassurance that the matter will be considered fully at application stage.
- 3.7 Committee are asked to note that Policy EM1 allocated land sufficient to accommodate 17 new homes. This is slightly higher than the requirement of 15 dwellings set in the draft policy SD23 of the South Downs Local Plan: Preferred Options and provides a suitable non deliverability buffer.

4. Planning Committee

- 4.1 The EMNDP is being considered by Planning Committee as it:
- Allocates land for development
 - Provides slightly more housing than is required by the South Downs Local Plan

5. Next steps

Stage	Timescale & further details
Examiner appointment	The Examiner (Mr John Slater) has been appointed to examine the East Meon NDP
Examination	The Independent Examiner has indicated that he is able to start the examination in mid-March. Examination is expected to take 4 - 6 weeks including preparation and issuing of the final report.
Examiner issues final report	The Examiner makes one of the following recommendations: <ul style="list-style-type: none"> • The Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements • The Neighbourhood Plan, as modified, should proceed to Referendum • The Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

Decision on a Plan Proposal	If time allows ¹ , Planning Committee will be asked to consider the Decision Statement which sets out the modifications to be made to the plan in response to the Examiners report.
Referendum	<p>Subject to a successful examination and the approval of the Decision Statement, there will be a referendum when the community are asked:</p> <p><i>“Do you want the South Downs National Park Authority to use the neighbourhood development plan for East Meon to help it decide planning applications in the neighbourhood area?”</i></p> <p>If over 50% of those who vote say yes, the EMNDP will be adopted by the SDNPA.</p>

6. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	Yes – Agreement of the Decision Statement and agreement to ‘Make’ the EMNDP at a subsequent Planning Committee if a referendum is successful.
Does the proposal raise any Resource implications?	<p>Yes - the SDNPA have claimed £5,000 in new burdens funding from Department for Communities and Local Government (CLG) to date. SDNPA have then granted East Meon Parish Council £5,000 to support the cost of preparing the EMNDP. In addition, the SDNPA will be able to claim £20,000 shortly to cover the cost of the Examination and Referendum.</p> <p>The cost of Neighbourhood Planning to the SDNPA is currently covered by the grants received from CLG. However there are signs that these are going to start to reduce as Neighbourhood Planning increasingly becomes part of the mainstream. Currently within the National Park the cost of producing a plan ranges from around £7,000 (including the Examination and referendum) to £80,000.</p> <p>Once a NDP is made, a Parish Council is entitled to 25% of Community Infrastructure Levy (CIL) collected from development within the neighbourhood area, as opposed to the capped 15% share where there is no NDP. The Parish Council can choose how it wishes to spend these funds on a wide range of things which support the development of the area.</p>
Has due regard been taken of the South Downs National Park Authority’s equality duty as contained within the Equality Act 2010?	Due regard has been taken of the South Downs National Park Authority’s equality duty as contained within the Equalities Act 2010. East Meon Parish Council who have the responsibility for preparing the neighbourhood plan have also prepared a Consultation Statement demonstrating how they have consulted the local community and statutory consultees. The Examiner who assesses the plan will consider whether the Consultation Statement meets regulatory requirements. One of the Basic Conditions which the LNDP is required to meet is to ‘Be compatible with EU obligations and human rights requirements’ therefore the examiner will be required to check that the plan does not breach this condition

¹ Government regulations now require Decision Statements be published within 5 weeks of an Independent Examiner’s report being issued. If there is insufficient time to take the Decision Statement to Planning Committee, it will be delegated to officers.

Implication	Yes/No
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:	<p>East Meon Parish Council as the qualifying body with responsibility for preparing the neighbourhood plan must demonstrate how its plan will contribute to the achievement of sustainable development. This is set out at Section 5 of the Basic Conditions Statement. Please note that the sustainability objectives used by qualifying bodies may not be the same as used by the SDNPA, but they will follow similar themes.</p> <p>Strategic Environmental Assessment</p> <p>The SDNPA, in consultation with the relevant statutory bodies, screened the EMNDP out of requiring a Strategic Environmental Assessment. Details of this decision can be found at Appendix I of the Basic Conditions Statement</p>

7. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
The NDP does not meet the basic conditions	Low	Medium	SDNPA planning officers have been contributing to the preparation of the emerging EMNDP and are comfortable that it meets basic conditions. This will be tested by the examination of the plan and should issues be identified there are a number of mechanisms available through which they can be addressed.

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Appendices

1. East Meon Neighbourhood Development Plan – Submission version
2. SDNPA comments on the Submission version of the EMNDP
3. East Meon Designated Neighbourhood Area Map

SDNPA Consultees Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning

External Consultees The Submission version of the EMNDP is open to anyone to comment on. The SDNPA has publicised it and circulated to all known

interested parties. Officers will coordinate all the responses and forward them to the Examiner.

Background Documents

[SDNPA response to the East Meon Regulation 14 consultation](#)

[EMNDP Basic Conditions Statement](#)

[EMNDP Consultation Statement](#)

[SDNPA SEA Screening Opinion for EMNDP](#)

[East Meon Pattern Book](#)

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

Ref	Comment	SDNPA Recommendation
	General Comments	
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.
	The purpose of the Neighbourhood Development Plan	
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.
	Habitats Regulation Assessment	
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

Ref	Comment	SDNPA Recommendation
Section 2	Parish Profile	
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: Preferred options 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: Preferred Options identifies five broad areas <u>and four river corridors</u> of the South Downs National Park (see pages 37-49 of SDLP: Preferred Options) East Meon falls within the Dip Slope, to which the draft Core Policy SD4 of the SDLP: broad area Preferred Options applies. The Dip Slope 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. The broad area is also home to the river Meon and its high quality habitats which support a range of protected specific including water vole and otter.
Section 3	Our Vision	
	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
	Spatial Strategy	
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	Core Policy SD1 of the South Downs Local Plan: Preferred Options provides the development plan policy for sustainable development. The East Meon approach to its Neighbourhood Development Plan adheres to the core policies of the South Downs Local Plan

Ref	Comment	SDNPA Recommendation
	Housing Provision	
Section 4.9	Additional wording to provide clarification as to the intention of the policy.	Policy SD23 of the The emerging South Downs Local Plan: Preferred Options indicates that East Meon should allocate <u>sites to accommodate</u> 15 new homes.....
Policy EM1	East Meon Housing Allocation to 2032	
	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 +5 <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 policy SD23 of the South Downs Local Plan: Preferred Options <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	Maximum <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>)
Policy EM2	The Settlement Policy Boundary	
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

Ref	Comment	SDNPA Recommendation
	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 this Plan, the NPPF, the JCS, the saved policies of the East Hampshire Local Plan 2006 and the South Downs Local Plan <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 apart from on the proposed sites allocated in this Plan, or in other <u>than in exceptional circumstances in accordance with policy SD22 of the South Downs Local Plan: Preferred Options the Development Plan,</u> or including for <u>essential</u>
Policy EM5	Protection of Valued Views	
	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 or diminution of significant views that currently provide open aspects or views both from within and outside the village or other open spaces. 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 which are within, to and from settlements which contribute to the viewer's enjoyment....
4.27 third sentence	Minor amendments to supporting text.	Accordingly, in considering the location of potential housing sites, it will be <u>is</u> important to minimise any impact....
Policy EM8	Outbuildings and Enclosures	
	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.
	Local Green Spaces supporting text	

Ref	Comment	SDNPA Recommendation
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....
Policy EM10	Local Green Spaces	
	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. 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. 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,	Sites proposed as Local Green Space <u>Local Green Spaces</u>
4.37	Minor amendment to policy wording	Policy EM10 provide protection for respectively , open spaces, including allotments...
EM11	Retention of Community Uses	
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.

Ref	Comment	SDNPA Recommendation
	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.	
Policy EM14	Site A3: Land off Hill View	
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
EM14	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.
Policy EM15	Land at B3/B4 (Coombe Road)	
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.

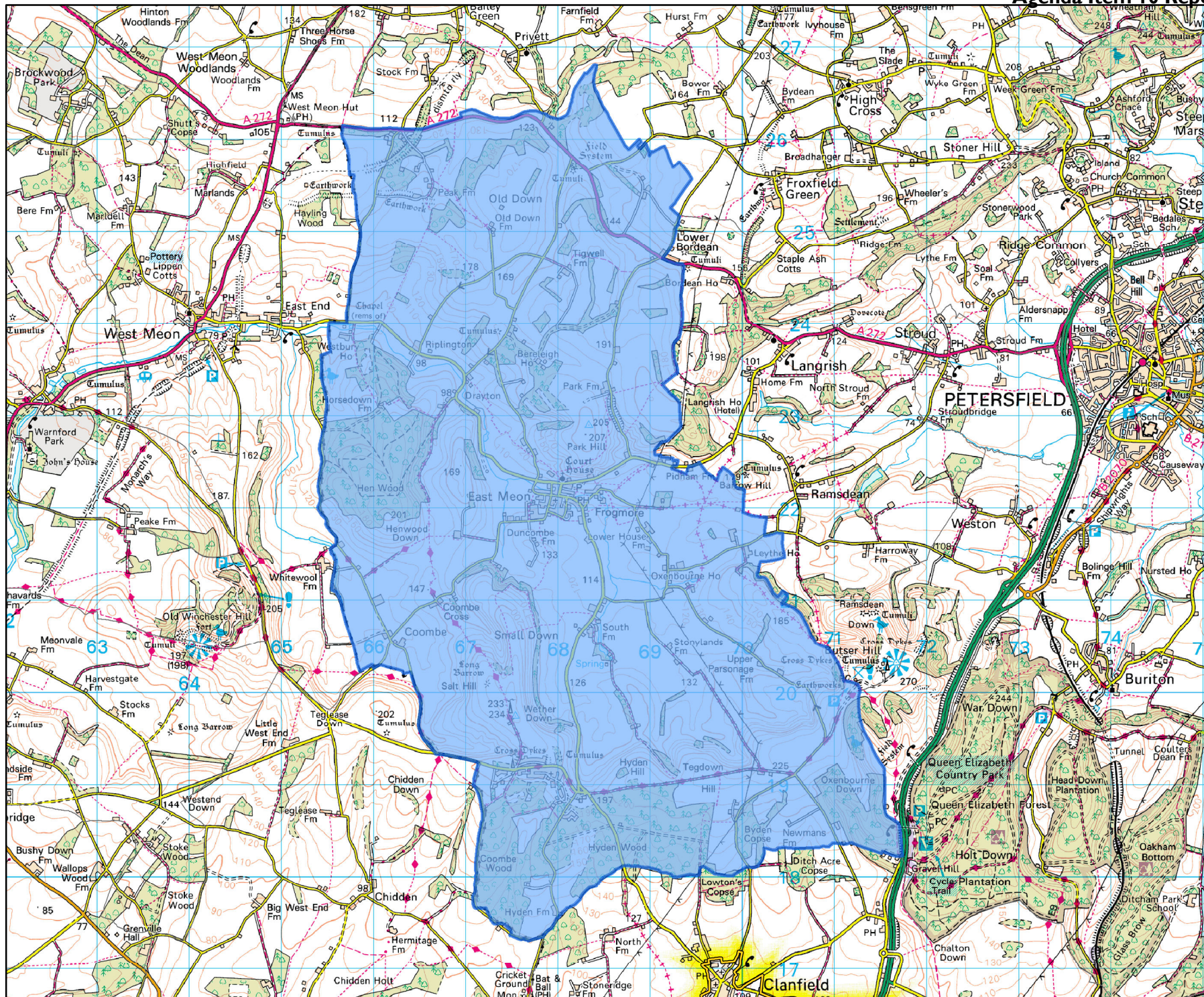
Ref	Comment	SDNPA Recommendation
	order to ensure that the condition meets the tests set out in national guidance. The clause could state: "During the planning application process, consideration will be given to the removal of relevant permitted development rights as contained within the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended to ensure that development is appropriate to the site and character of the locality."	
Bullet point 10	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.	Consider whether the policy clause is required
Site B2	Land south of Coombe Road	
Figure 7	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.	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
Policy EM16	Land at B2 (South of Coombe Road)	
Bullet point 12	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."	Consider rewording the policy clause relating to permitted development rights.

Ref	Comment	SDNPA Recommendation
Policy EMI 7	Land at B9 (Corner of Coombe Road)	
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.



Designated Neighbourhood Area

- Within the National Park
- Outside the National Park -
- Not Designated by National Park Authority
- South Downs National Park Boundary



Scale @ A4 55,000

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**Designated
Neighbourhood Area:**

East Meon

