

SDNPA Comments on the Reg 14 Pre-Submission Bury Neighbourhood Plan November 2016.

Comments submitted January 2017

These are informal comments provided by officers on the draft Bury Neighbourhood Development Plan.

Page No	Section	Comments
	Whole Plan	We welcome the progress of the Bury NDP to pre submission stage and understand considerable work has been put in by the steering group to get to this stage. The draft plan is clearly set out and is succinct. Additional detail in some areas will help make the plan more locally distinctive.
		It may assist to insert the word “Policy” before the policy number in each case.
		References to ‘brownfield’ and ‘backland’ development – need to be careful with wording i.e. how are these defined – in particular ‘considered to be backland’ is very open to interpretation
		Have Horsham District Council, Arun District Council and adjoining parishes been consulted?
	Map	This shows under “other designations” conservation areas and listed buildings – but I’d suggest it should also include Scheduled Ancient Monuments, and the two registered parks. Also what about ancient woodland? The inset map is also small and unclear, suggest a larger version as a separate map.
	1 Introduction	
	1.10	First bullet point - delete “(relevant to the area of the Parish of Bury within the National Park)”
6	2 Vision and Objectives	The commitment could also be to enhance the Parish's character and unique sense of place.
7	3 About Our Parish	Description of the Parish could be expanded to include the following (could relocate sections on Natural and Historic Environment etc here) <ul style="list-style-type: none"> • Historic Environment and Character: • Natural environment and Landscape Character • Land Use/Economy • Demographics

		<ul style="list-style-type: none"> • Housing Need
	3 About Our Parish	<p>It would be useful to acknowledge the local planning constraints, these ideally would be mapped</p> <ul style="list-style-type: none"> • Conservation Area • Listed Buildings • Registered Parks • Protected Trees • Scheduled Sites • Flood Zones
9	4 Built Environment and New Homes	Plan could be expanded to include a specific design policy – which could include a reference to preparing a Village Design Statement
	<u>Para 4.4</u> background evidence)	Refers to settlement boundary being changed. This needs to be clearly shown on a map within the document (not just in supporting document).
	BNDP2 Settlement Boundary	The Settlement Boundary has been amended and we welcome use of the Settlement Boundary Methodology and largely agree with the amended boundary. We have some concern however over inclusion of the large gardens and woodland north of Church Lane, recommend removing these from the settlement boundary. In addition the settlement boundary should be extended to include the site allocation, this can be done by using a finger of settlement boundary, drawn tightly around the new allocated site, leaving the large plots in open countryside and therefore development only appropriate in exception circumstances
	BNDP 2 Built Character	<p>Suggest including some photos to illustrate the local built character</p> <p>This policy could be expanded to address layout, density, form, massing on plot, setbacks, roof form, boundary treatment and how buildings relate to each other etc.</p>
	BNPD 3a and 3b Allocation for new housing	Allocation of this site is supported in principle. Further consideration should be given to the density of development being proposed and making effective use of land. The community is seeking a mix of 2 and 3 beds, however an allocation at a low density could lead to properties being substantially extended in future. The policy would benefit from more detail on design requirements including roof character and boundary treatments.

		<p>Indicative layouts with access arrangements should be provided taking into consideration impacts on the setting of heritage assets (e.g. conservation area and nearby listed buildings).</p> <p>Map showing allocation sites needs to be clearer – suggest a thinner outline on a 1:10,000 base.</p> <p>(i) insert “net” after 6</p>
	BNDP4 Unallocated residential development	<p>Second part of this policy allows for small-scale development outside the settlement boundary. This conflicts with emerging SDNP Local Plan policy SD22 which states development outside the settlement boundary would only be permitted as Rural Exception Sites (100% affordable housing). By promoting this policy the community are weakening their ability to deliver affordable housing. Recommend either deleting the policy or significantly revising. The steering group may want to contact Patching Parish Council as they are developing an interesting policy on housing in the countryside. The policy allows for very limited housing in the countryside in exceptional circumstances where it is shown to meet a local need. A lot of work has gone into this policy which the steering group may be able to learn from. The draft policy can be viewed here: https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/patching-neighbourhood-plan/</p> <p>Twice refers to “backland” – should the supporting text add that this is defined in the glossary?</p>
	Para.4.19	SDNP Local Plan is now timetabled for adoption in 2018
14	5 Natural Environment	
	BNDP5 South Downs National Park	<p>Currently this policy adds nothing more to the existing SDNP Partnership Management Plan. Could this policy be made more locally distinctive by detailing how the special qualities are present in Bury? E.g. what are the key landscapes and notable views? Are there particularly tranquil places in the parish? What opportunities for recreation are there in the parish – footpath and bridleways? What historical features are present (see further comments on section 6)?</p>
	BNDP6 Our Landscape	<p>Include reference to Landscape Character areas (Natural England), West Sussex Landscape Character Guidelines and also Historic Landscape Characterisation (HLC). ‘stark built form’ is not clear, suggest some clarification is given such as ‘visually prominent’ and visible from local viewpoints, public rights of way and open spaces. If referring to the different landscape character types, it would assist if they are identified on a map</p>

	Para 5.7	Delete “was designated in 2012” – suggest – “became fully operational on 1 st April 2011”
	BNDP7 Views	Suggest the identified key views are identified (in a broad manner) on a map. See Amberly NDP Submission version (pg 41) for an example of this.
	BNDP9 Woodland & Trees	Suggest “have the potential to” after “will” in the final sentence.
	BNDP11 Dark Skies	Suggest using Dark Night Skies throughout the plan
	6 Our Heritage	<p>Further clarity should be given to non-designated heritage assets, including archaeological assets and potential archaeological interest for which there is currently no protection under any of the policies in section 6.</p> <p>Could include a policy on protection and enhancement of the historic environment, to cover all types of heritage assets including non-designated assets, including listed buildings and structures and other undesignated heritage assets and archaeology, which may be identified through the planning process and not just sunken lanes and historic walls.</p> <p>If there are historic Orchards that merit protection they should ideally be mapped. The history of the orchards, what fruit they produced and for what purpose could be incorporated into the history of the parish section</p> <p>This is supported by English Heritage Advice:- “It is often a place's heritage that makes it special. That distinctiveness not only gives local people a sense of belonging or identity and a feeling of pride in a place, but it can help to attract investment to an area. Heritage can also be a powerful tool for delivering regeneration and providing space for business, community facilities and other activities. By its very nature this local heritage is valued by its community.</p>
	BNDP12 Sunken Lanes, BNDP13 Historic Walls, BNDP14 Historic Orchards	<p>Can these features be identified on a map?</p> <p>The review of heritage assets (document published on the parish website) contains no mention of the Historic Environment Record and doesn't consider non-designated archaeological assets or potential interest. It contains no mention of Historic Landscape Character, so fails to identify significant preserved historic landscapes</p> <p>Could a case be made to designate any historic orchards as Local Green Space?</p>

	BNDP16 Recreational & Community facilities	What is the benefit of this policy? Bury Green, Recreation Ground, and the wharf would be adequately protected as Local Green Spaces in Policy BNDP18. The school is due to be identified as an Asset of Community value. This leaves the village hall (presumably not an ACV as it is already owned by the Parish?)– but what is the likelihood of it being threatened with development?
	BNDP17 Retention of Assets of Community Value	Should ACVs be separately listed as an appendix? Chichester District Council are responsible for the registering of Assets of Community Value. Can BNDP16 and 17 be combined to provide a general policy that protects all community facilities?
	BNDP 20 Parking	Setting a standard by bedspace might lead to over-provision of parking which can cause design issues and also push up property values (e.g. a 3 bed house could be required to provide 3 spaces which seems excessive for normal requirements). How is visitor parking dealt with – would suggest some unallocated provision would be appropriate.

Comments from Chichester District Council

Thank you for the opportunity to comment upon this Neighbourhood Plan, our comments are as follows:

The plan is clear, simple and straightforward, it provides a good basis from which to start from and establishes the area as it currently is. The Village Hall, along with their other community facilities within the area have been identified. The policies identify and protect these facilities against new development which is good, although only protection is mentioned, there is nothing in relation to enhancements or future expansion of said facilities. Nor does the Plan go into any great depth or detail.

In the vision statement (2.1), it states ‘encourage our vibrant schools and local business to flourish through community cohesion’ however, how this is achieved or what the next stage is to achieve this has not been identified. There are no actions or identified plans for the future, only the impact of development and what they do and do not want from it.

In particular with regards to point 7.7 (page 26) and the retention of assets of community value:

7.7 ...an asset of community value is land or property where its main use “furthers social wellbeing or the social interests of the community” instead of “importance to a local community”.

Plus in, 7.8 The registering of Community Assets is a separate process initiated by the Parish Council but undertaken by Chichester District Council (not SDNPA). The inclusion of such assets... will provide the community with an opportunity to bid to acquire the asset for community ownership if it was subsequently placed for sale on the open market.

Re the policies, why the distinction between BNDP16 and 17? For consistency could both be "...only supported where it can be demonstrated the development will be of benefit to the local community"?

Not for inclusion in the Plan but for Bury PCs info, full details of the nomination process for Assets can be found at www.chichester.gov.uk/communityrighttobid