

SDNPA response to the pre submission Rogate & Rake Neighbourhood Plan

Page number	Section	Comments	SDNPA Recommendation
6	1.1.1	We note that the plan period stretches beyond that of the South Downs Local Plan (SDLP). In order for there to be consistency it is recommended that the plan period for the Rogate & Rake NDP (RRNDP) extends to 2033 rather than 2035.	Reconsider plan period.
8	1.4.5	There are 7 identified special qualities to the SDNP, the following are missing from this paragraph: <ul style="list-style-type: none"> • An environment shaped by centuries of farming and embracing new enterprise • Well-conserved historical features and a rich cultural heritage • Distinctive towns and villages, and communities with real pride in their area 	Include full list of SDNP special qualities
7	1.4 Planning Policy	The South Downs Local Plan: Preferred Options was consulted on in the Autumn of 2015, since then revisions have been made to the emerging Local Plan and the National Park Authority agreed to consult on a pre-submission version of the South Downs Local Plan in the Autumn of 2017.	Update references to the South Downs Local Plan throughout the RRNDP
10	2.1.8	Missing population figure for hamlets.	Include population figure where available.
10	2.3.1	SINCs were known as Sites of Nature Conservation Importance (SNCI) in West Sussex, but they are now called Local Wildlife Sites. Reference to areas of Ancient Woodland could also be included here	Amend terminology Include reference to areas of ancient woodland within the neighbourhood area

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13	2.5.2	<p>The plan states the SDNPA, using data from CDC’s affordable housing needs register, identifies an appropriate level of development in Rogate over the plan period would be 11-25 homes. This is not accurate as the emerging South Downs Local Plan (SDLP) has set a requirement for Rogate of just 11 homes. The housing figure for Rogate, as with other settlements in the National Park is landscape-led and in line with the first purpose of the National Park to ensure that any housing development does not detract from the natural beauty, wildlife or cultural heritage of the National Park. We have used a wide ranging evidence base in support of this including Viewshed, Tranquillity and Habitat Connectivity. These all fed into the Strategic Housing Land Availability Assessment (SHLAA) along with other evidence for example on highways and flooding.</p> <p>The emerging SDLP Policy SD26 states NDPs may accommodate higher levels of housing than is set out in the Local Plan, providing they meet local housing need and are in general conformity with the strategic policies of the development plan.</p> <p>Reference is made in the Plan to a 2011 Housing Needs Survey – this should be included in the Evidence Base. The plan states that the Housing Needs Survey identified a need for 14-26 affordable homes. It would be useful to understand these figures better as we’re aware that in 2014 Chichester Housing Register recorded 12 households with a local connection to the parish, of which 7 (58%) are in bands A-C and considered to have a priority need for housing.</p>	Provide and clarify evidence base for local housing need

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		<p>We note and welcome that there is community support for at least 50% of the new homes to be affordable housing. The current adopted affordable housing requirement for Chichester District is 40% on sites of 10 or more and 20% on smaller sites. The emerging SDLP policy is for a minimum of 50% affordable homes on sites of 11 or more homes. On smaller sites, a proportion of affordable homes will be sought on the following sliding scale:</p> <p>3 homes - Meaningful financial contribution, to be negotiated case-by-case 4-5 homes - 1 affordable home 6-7 homes - 2 affordable homes 8 -9 homes - 3 affordable homes 10 homes - 4 affordable homes</p> <p>These levels are subject to the SDLP policy being adopted following Examination in Public.</p>	
14	2.5.3	<p>The plan refers to a need for new housing to provide one, two or three bedroom homes to meet local needs. The evidence base for this statement should be included – are the results of the Housing Needs Survey being referred to here or another source of information in addition to this?</p>	Provide details of evidence base
16	Objective 2 Natural Environment	<p>You may wish to expand this objective to also cover water systems (river, ponds, etc.) which are also key elements of the natural environment and characteristic features of the landscape.</p>	Include water systems in Natural Environment objective

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19	Policy NE1: Conserve, Protect and Enhance the Natural Environment	<p>Policies H1, H2, H3 and H4 have the potential to increase population in existing properties or through windfall development of new dwellings. These policies are restrictive policies and the scale of development which may come forward is expected to be small. In light of the conclusion in the HRA for the Preferred Options Local Plan, the following wording is recommended to be included in Policy NE1 (new wording underlined):</p> <p><u>‘Development proposals resulting in a net increase in residential units within 5km if the boundary of the Wealden Heath Phase II SPA will require a project-specific Habitats Regulations Assessment screening to determine whether a likely significant effect on the integrity of the site will result and any requirements for mitigation are identified.’</u></p> <p>We note and welcome that views of special local significance have been identified in the Plan.</p> <p>Bullet point (a) would better read as “<u>conserve and enhance the natural beauty...</u>” which is in line with national and local policy regarding the natural environment.</p> <p>For clarity bullet point (d) should refer to <u>new</u> development.</p> <p>It would be helpful to also refer to the SDNPA Dark Sky Quality Map in addition to the Tranquillity Study to assess proposals.</p>	<p>Recommended addition to Policy NE1:</p> <p><u>‘Development proposals resulting in a net increase in residential units within 5km if the boundary of the Wealden Heath Phase II SPA will require a project-specific Habitats Regulations Assessment screening to determine whether a likely significant effect on the integrity of the site will result and any requirements for mitigation are identified.’</u></p> <p>Clarify policy wording</p>
22	Policy BE1: Locally distinctive	<p>First sentence refers to ‘good quality’ design – surely reference should be made to ‘high quality’. Also it would be good to see reference to design being informed by the landscape i.e. a landscape-led approach.</p>	<p>Revise policy wording</p>

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	design within the Parish	<p>The word 'innovative' refers to function, more than architectural style. Is the aim here not to preclude 'contemporary' architecture? We would recommend the wording is revised to clarify the policy's intention.</p> <p>The word 'design' is quite generic. If the real meaning here is architectural style then it should be defined. The spaces between buildings should also be considered: orientation of built form on plot, boundary treatments etc. The 'character' of the context and settlement patterns should inform this.</p> <p>Given the quality of dark night skies in the neighbourhood area, it would be appropriate to avoid the use of modern style high powered lighting designs and external security lighting that would reduce the quality of the locally distinctive character, particularly within the Conservation Area. In addition, discouraging the use of excessive amounts of glazing, particularly towards or in the open the countryside would help conserve the quality of dark night skies.</p>	<p>Include additional policy criteria to ensure locally distinctive design and design which conserves the quality of dark night skies.</p>
23	Policy BE2: Conservation Area	<p>Development proposals within the setting of the Conservation Area can also have an impact on the character of the Conservation Area. We therefore recommend the policy also refers to proposals within the setting of the Conservation Area.</p> <p>We would recommend use of the term 'conserve' rather than 'preserve' which is more active but would still relate to actively retaining a façade in its historic form for example.</p>	<p>Refer to proposals within the setting of the Conservation Area.</p> <p>Amend policy wording.</p> <p>Include reference to materials which contribute to the character of the conservation area.</p>

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		There is no specific mention of materials in this policy although we note para. 2.3.4 refers to local stone.	
24	Housing	Paragraph 4.5.4 includes the emerging SDLP draft thresholds for affordable housing provision. These figures are subject to change, and have been revised since the Neighbourhood Plan has been drafted. We would therefore recommend that the Plan simply cross-refers to the SDLP which then ensures the information in the submission NDP is correct and confirms with the SDLP.	Remove affordable housing thresholds. Include reference that affordable housing will be sought in line with the adopted Local Plan policy.
24	Policy H1: Settlement Boundary	Proposals will need to be consistent with the Development Plan in addition to the policies in the Neighbourhood Plan.	Include reference to compliance with the Development Plan.
25	Policy H2: Residential Development in the Open Countryside	<p>The RRNDP sits within the context of national and local planning policies. As currently drafted, policy H2 re-emphasises much of the protection already afforded by national policy and emerging Local Plan policy. This additional layer may be unnecessary, risks creating significant confusion and may in places be in conflict with higher level policy, thereby undermining the level of protection afforded. The policy omits the exception for proposals where the innovative nature of the design of the dwelling would meet NPPF paragraph 55. This potentially creates a conflict with national policy.</p> <p>It would be helpful to acknowledge in the supporting text of this policy the SDNPA's approach towards Whole Estate Plans, which supports proposals outside settlement boundaries where these are part of a</p>	<p>Reconsider whether policy is necessary and if so reword policy to ensure conformity with national policy.</p> <p>Provide reference to Whole Estate Plans in the supporting text.</p>

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		Whole Estate Plan or Large Farm Plan that has been endorsed by the Authority.	
26	Policy H3: Conversion of Existing Residential Properties	Where conversions are made to historic buildings, reference should also be made to conserving the historic fabric of the building. Criteria (b) for sufficient off-street parking should be without adverse landscape or visual impact.	Include additional criteria regarding the conversion of historic buildings. Ensure parking provision does not have an adverse landscape or visual impact.
27	Policy H4: Replacement Dwellings, Extensions and Annexes	See comments made on Policy BE1 which covers some of the same issues.	Reconsider policy wording.
29-32	Policy H6: Allocation of Sites Suitable for Development	Supporting evidence is needed to provide detail on all the sites considered and the rationale for selecting particular sites. Some of this is covered in the Potential Development Sites Background Paper, although this needs to be updated as the Plan now allocates sites. A map showing the location of both of the site allocations would be helpful. Also the site boundary of the site allocations needs to be provided. As the South Downs Local Plan affordable housing requirements have yet to be adopted we would advise removing reference to these in the allocation policies.	Provide supporting information on the site selection process Include map showing both site allocations Remove un-adopted South Downs Local Plan affordable housing requirements from policy wording.

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		<p>Figures 4.4-6 show site layouts which we understand have been prepared to establish the capacity at each site. It may be that there are other appropriate layouts and we would advise that the Plan makes clear these are only indicative layouts and not mandatory.</p> <p>(b) Renault Garage and bungalow south of A272, Rogate Confirmation on the availability of this site is required. It is currently in active use. We would also query whether the garage provides services (i.e. servicing/repairs) other than car sales? If so, then should the loss of the services be taken into account? Preference should be made for the two sites being developed as one to ensure they relate well to one another and allow for space within the development for mitigation measures. The site is adjacent to the Conservation Area and Rogate Lodge – a locally important historic parkland, is on the opposite side of the A272. The rear boundary of the site is a historic landscape feature and should be conserved. Locally important viewpoint 15 could be improved by development at this site. Additional criteria to the allocation should ensure pedestrian access to the village is provided as well as the wider countryside.</p> <p>(c) Land on north side of B2070 London Road west of Flying Bull PH, Rake We have a number of concerns about this site - it will possibly result in loss of trees, it is at a higher level than the adjacent road, and the layout plan in Figure 4.6 shows garden land outside of the Parish/Designated NDP area, and thus beyond the remit of the NDP to allocate. There is potential for landscape archaeology to be present along the historic administrative boundary (ditches/banks/mature marker trees etc.) which</p>	<p>Emphasise that layouts are indicative.</p> <p>Confirm availability of site.</p> <p>State preference for sites to be developed as one.</p> <p>Reference the Conservation Area, nearby historic parkland, locally important viewpoint and historic field boundary.</p> <p>Include criteria for pedestrian access into the village and the wider countryside</p> <p>Address concerns raised with site allocation.</p>

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		<p>should be conserved. Any rear boundary should not be walls but instead trees and the design of the plots should be driven by the wooded character or the area.</p> <p>Development of this site could be considered if a case was being made for the housing being essential in order to “enable” retention/continued viability of the pub (which is identified as a Community Facility on Policy CHI and which the NDP Group intend to register as an Asset of Community Value) – but no such justification appears to have been given.</p> <p>It should be noted that the site is located close to the boundary of the parish with Liss. The housing provision figures set out in draft policy SD26 relate to settlements rather than parishes. The draft allocation is in Rake and not the village of Rogate. The allocation would not therefore contribute to meeting the housing provision figures set in SD26 for Rogate. It is recommended that Rogate Parish discuss this emerging allocations with Liss Parish.</p>	
34	Policy T1: Encouraging Sustainable Travel	<p>This policy requires that, where practical, new development to connect to the nearest point of the public right of way network and that opportunities to enhance existing links should be taken wherever possible. There could therefore be an increase in access to international designations and recreational disturbance of protected species.</p> <p>In order to ensure that there are no adverse effects on the integrity of international designations, it is recommended that the following wording is added to policy T1 (new text underlined):</p>	<p>the following wording is added to policy T1 (new text underlined):</p> <p>‘Planning permission will not be granted for development that would have an adverse impact <u>on international nature conservation designations, or on to the amenity value...</u>’</p>

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		<p>'Planning permission will not be granted for development that would have an adverse impact <u>on international nature conservation designations, or</u> on to the amenity value...'</p>	
n/a	CIL	<p>There is no mention in the Plan of Community Infrastructure Levy (CIL), or any explicit indication of how CIL money collected from development in the area might be prioritised, or indeed what any projects within the area that might be considered suitable for funding through the CIL money that will be collected by the Parish Council. There are potentially some of the key projects and actions from the Plan that could be drawn out as a starting point for this, for example the Community Projects list. There are also some good hooks for where reference or consideration could be made (paragraphs 3.4 and 6.1.7, for example)</p> <p>There is no set way of how to address CIL in NDP's, although the Wisborough Green NDP (http://www.chichester.gov.uk/neighbourhoodplan#wisborough) is a good example of how consideration has been given to various projects and how they might be funded, as well as how these might be prioritised by the Council (see the community action plan towards the end of the document).</p>	<p>Include details in the Plan on how CIL will be prioritised and whether any projects within the neighbourhood area might be considered suitable for funding through CIL money.</p>
33	Policy EW1: Supporting the rural economy	<p>The second bullet point of the policy ends "or" – it appears that an important section of this policy is missing. This second bullet point also appears to allow for a wide range of development which may not be appropriate in a rural location. The use of the word "redevelopment" is</p>	<p>Clarify wording</p>

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		<p>unclear – e.g. does this support demolition of redundant farm buildings and erection of newbuild in their place?</p> <p>It would be helpful to acknowledge in the supporting text of this policy the SDNPA’s approach towards Whole Estate Plans, which supports proposals outside settlement boundaries where these are part of a Whole Estate Plan or Large Farm Plan that has been endorsed by the Authority.</p>	<p>Provide reference to Whole Estate Plans in the supporting text.</p>
37	Policy CH3: Public Open Spaces, Village Greens and Local Green Space	<p>Experience at the Petersfield NDP Examination and others highlights the need to evidence how Local Green Spaces have been selected and justify how they meet the requirements as set out in the NPPF paragraph 77. How are they demonstrably special? Are they in close proximity to the proximity they serve?</p> <p>It would be useful to include details of the village greens which are shown on Fig 4.7.</p>	<p>Provide further evidence in support of the Local Green Space designations</p> <p>Include village green details</p>
42	7. Monitoring and Review	<p>Since the last iteration of the R&RNDP guidance has become available on how a NDP might be reviewed and what the requirements will be to do so. These include a streamlined process for minor amendments to NDPs. The details of 7.1.2 are subsequently inaccurate and we would recommend removing this section or the level of detail reduced so that the Parish Council does not become tied to a certain course of action in the future.</p>	<p>Remove wording or reduce level of detail.</p>

