

Page No	Section	Comments	SDNPA Recommendation
	General	The progression of the Ditchling, Streat and Westmeston Neighbourhood Plan (DSW NDP) to submission stage is to be congratulated and is a result of a considerable amount of hard work by the parish councils and volunteers. This is a particular achievement for one of the few cluster NDP prepared in the National Park which covers three different parishes. We appreciate that many of our comments raised during the previous consultations have been addressed and we welcome this revised submission version of the DSW NDP. Our comments at this stage largely relate to minor corrections and amendments, with just a couple of more significant issues outstanding.	
	General	We recommend that the final plan includes paragraph numbers and all policy criteria are numbered rather than using bullet points. This will make the plan much more effective and useable for development management purposes.	Include paragraph numbers and numbered policy criteria
2	Map	The title of this map should make clear that it is the designated neighbourhood area shown.	Amend map title
6	Policy reference table	Whilst the policy reference table distinguishes between land use and non-statutory aspirational policies using different colours, we still consider this table could be misinterpreted and undue weight given to the aspirational policies. It is important to make a clear distinction between the land use policies which will be subject to the referendum and other aspirations contained within the Plan. We therefore recommend a separate numbering system for the land use policies and that the aspiration policies are re-named 'community actions' or similar.	Amend policy reference table
10	1.1	The South Downs Local Plan covers the time period 2014 to 2033. We recommend that the DSW Neighbourhood Plan extends to the same end date.	Correction
14	Vision	We would recommend that references to the SDNP either state SDNP in full or the 'National Park'.	Replace 'park' with SDNP or National Park
18-19	National & Local Planning Policy Context	Para. 2.1 The final sentence is inaccurate and confusing. We recommend this is replaced with the following text: <u>"The Lewes District Local Plan Part 1: Joint Core Strategy (JCS) was adopted by Lewes District Council in May 2016 and the SDNPA in June 2016. This plan covers the whole of the three parishes. In time, the SDNPA will adopt a Local Plan for the entire national park, at</u>	Amend text and footnote

Page No	Section	Comments	SDNPA Recommendation
		<p><u>which point this will supersede the Joint Core Strategy and Lewes District Local Plan 2003 for those parts of the parishes within the national park.”</u></p> <p>Footnote 22 – The Lewes District Local Plan (2003) has only been superseded in part. Some of the policies (mainly the detailed development management policies) are still saved and relevant.</p> <p>The JCS will only cover the plan area <u>outside</u> the national park once the South Downs Local Plan is adopted.</p> <p>We recommend that this section includes details of the legal challenge made by Wealden District on the Lewes JCS and the subsequent High Court ruling which resulted in the quashing of policies SP1 and SP2 of the JCS. Policy SP1 sets the overall development requirements for the district and SP2 sets the housing requirement of 15 net additional units in Ditchling. The judicial review centred on the methodology for the Habitat Regulations Assessment (HRA) in regard to measuring traffic movements through Ashdown Forest, which is a Special Area of Conservation (SAC).</p> <p>The scale of development proposed (a net gain of 15 dwellings) is such that there are not likely to be significant effects alone. However, air quality is a potential issue when considered in combination. Given the strategic nature of in combination traffic and air quality, this issue is by definition, one that cannot be fully explored and resolved by an individual neighbourhood plan and is most appropriately addressed through the Local Plan. The National Park Authority has completed work on air quality as part of the HRA of the Pre-Submission Local Plan, which has considered these in-combination effects. This work concludes that the impact of this allocation can be screened out as it has been assessed and addressed through the HRA of the Local Plan, which will be formally published in September 2017.</p>	
23-24	LPA Development Plans	<p>The final paragraph of page 23 and the following two paragraphs on page 24 refer to the contents of the emerging South Downs Local Plan but do not make this clear as the proceeding paragraph refers to the SDNP Partnership Management Plan. As the emerging South Downs Local Plan has yet to be adopted the policy numbering has and may again change. We would</p>	<p>Clarify that these paragraphs are referring to the South Downs Local Plan. Remove South</p>

Page No	Section	Comments	SDNPA Recommendation
		recommend removing reference to specific policy numbers as these may well change ahead of adoption.	Downs Local Plan policy number references.
27	Cross-policy benefits	We recognise the cumulative benefits of the policies contained within the Plan although would caution against reference to the Part B policies (or actions) in Part A as this could be interpreted as giving the Part B policies more weight than is appropriate given these are not land use policies, for example the preparation of a detailed traffic and parking plan.	
28	Housing	Third paragraph – the housing target is required to be met through allocations in either the Local Plan or a Neighbourhood Development Plan.	Amend text
30	HSGI	<p>This policy seeks to restrict new housing to either 1 or 2 bedroom houses or flats, 2/3 bedroom affordable homes or homes suitable for the ageing population.</p> <p>There is clearly community support for the provision of smaller units (1 and 2 bedroom homes). There is also evidence of need for smaller units both affordable and market homes in the Strategic Housing Market Assessment 2015.</p> <p>Affordable housing requirements are currently set by strategic policy. Currently the JCS requires 40% affordable housing on sites of 11 or more new homes. The emerging SDLP contains requirements for 50% affordable housing on larger sites and a proportion of affordable homes on smaller sites. The DSW NDP does not present any viability evidence that higher levels of affordable housing can be achieved. Elsewhere in the National Park, a Neighbourhood Plan Examiner removed a proposed lower threshold for affordable housing due to insufficient evidence. Here the Examiner recommended reference to the LPA's policies.</p> <p>To ensure conformity with the adopted strategic policy and ensure there is no conflict with future adopted strategic policy we would advise removing reference to the tenure of homes in this policy and focus on the type of housing sought as supported by the evidence base. We would therefore advise that the policy restricts new housing to either 1, 2 or 3 bedroom homes and this applies to the provision of homes for the elderly as well. The policy should also make reference to affordable housing being delivered in accordance with the Local Plan. The policy title should be amended to reflect this.</p>	<p>Amend policy wording</p> <p>Amend policy title</p>

Page No	Section	Comments	SDNPA Recommendation
30	HSG2	<p>Site density and layout – some minor amendments to the policy wording are suggested to clarify the meaning of the policy:</p> <p>“Outside Gardens and off-street parking...”</p> <p>“These <u>criteria</u> rules also apply to...”</p>	Clarify policy wording
30	HSG3	<p>This policy limits development in the countryside to a number of subscribed circumstances. We consider the policy would benefit from the following clarifications and amendments:</p> <ul style="list-style-type: none"> - Extensions which are ‘materially larger’ should be defined – we would advise that this is not more than a 30% increase in the existing floorspace - Small-scale development which supports an <u>existing</u> rural business - Reuse of redundant agricultural buildings for residential use should only be appropriate where development is restricted to occupation by rural workers or the reuse provides the optimal viable use of a heritage asset. <p>The final sentence referring to development at St George’s Park could benefit from being a separate policy / allocation for retirement / elderly care accommodation</p>	<p>Amend policy wording</p> <p>Separate out policy on St George’s Park</p>
31	HSG6 Infrastructure Capacity	<p>This policy seeks to ensure sufficient infrastructure capacity to support new development. We would seek the following clarifications and amendment:</p> <p>New / improved utility infrastructure will be supported where the design minimises the impact on the natural beauty, wildlife and cultural heritage of the national park and the amenity of local communities.</p> <p>“New residential and commercial <u>development</u> infrastructure will be permitted if...”</p> <p>It would be helpful to acknowledge in the supporting text that necessary infrastructure will be secured through a suitable combination of planning obligations such as S106 agreements, and tariffs, for example Community Infrastructure Levy (CIL) contributions. This is also an opportunity to highlight the communities’ priorities for infrastructure.</p>	<p>Amend policy wording</p> <p>Include reference to CIL and other arrangements in the supporting text.</p>
32	Development Sites	<p>There is a discrepancy between the second paragraph which refers to 3 units having planning permission and the table which includes two sites with planning permissions.</p> <p>Site 7A - The definition of ‘community housing’ is not clear. It is understood that part of site A will be delivered by a Community Land Trust. Is the intention that all new homes here will be affordable? If so the policy and related table should make this clear.</p>	<p>Clarify supporting text</p> <p>Clarify meaning of ‘community housing’</p>

Page No	Section	Comments	SDNPA Recommendation
34	Development Sites	<p>HSG 7A Park Barn Farm</p> <p>This site is located to the south of the village and would be an extension to the settlement in this sensitive location between the edge of the village and the transitional landscape which leads to the scarp slope and the South Downs ridge beyond. We recognise that the availability of alternative suitable sites in Ditchling has been limited and the neighbourhood planning group has taken all reasonable endeavours to find and consider sites in Ditchling to meet the housing target set by the adopted Local Plan. We would however, seek to ensure the maximum appropriate provision is made on other allocated sites to minimise the need for additional homes at this sensitive site.</p> <p>Our previous comments have highlighted that any provision of access off the Beacon Road would result in an unacceptable landscape impact. Access would therefore need to come through Long Park Corner and this should be made clear in the allocation.</p> <p>We also highlighted previously that there is substantial vegetation at the site and which appears to be consistent in age with the Ancient Woodland opposite, this vegetation should be appropriately protected in the allocation criteria. We recommend the allocation refers to the need for a full site survey and development to be undertaken in line with the British Standard 5837.</p> <p>Development would be visible from the Sussex Border Path to the immediate west of the site which is an important public footpath access to the scarp slope and Ditchling. We would therefore recommend the allocation ensures views from this footpath are protected by requiring well designed frontages, access and curtilage.</p> <p>For clarity we would recommend the following text is included in the policy: “Note that the site plans set out in supporting documentation are illustrative and not mandatory.”</p>	Amend allocation text.

Page No	Section	Comments	SDNPA Recommendation
		<p>The Development Framework refers to an indicative layout in Appendix A – this is no longer in this location.</p> <p>What will be the management arrangements for the land gifted for communal recreational use? Will the Parish Council take on the management of this land?</p> <p>Reference in the Development Framework to surface treatment on Beacon Road as part of a village-wide traffic calming scheme could be in conflict with CIL and what can be delivered via a S106 agreement. For example a developer can only be asked to deliver something which is a direct result of the development - they cannot solve an existing problem.</p>	
37	Development sites	<p>HSG 7B Lewes Road/Nye Lane</p> <p>This allocation should be clarified. The total allocation is for 7 dwellings for the site area defined in Figure 3.3/5.</p> <p>The Policy refers to figure 3.3/4 – this appears to be a typo as the site area is shown in Figure 3.3/5.</p> <p>We have previously noted concerns with the indicative layout for this site including whether there is sufficient vehicle manoeuvring space available for the proposed four terraced units. We do not consider the proposed two small units on land owned by the Neville Estate to be an appropriate layout and would suggest a courtyard mews arrangement on the garage site with accompanying parking on the Neville Estates land opposite would be more suitable. This alternative arrangement may well meet or exceed the allocation of 7 units, including a number of smaller units and flats.</p> <p>For clarity we would recommend the following text is included in the policy: “Note that the site plans set out in supporting documentation are illustrative and not mandatory.”</p> <p>The Development Framework refers to an indicative layout in Appendix A – this is no longer in this location.</p> <p>Reference in the Development Framework to surface treatment on Lewes Road as part of a village-wide traffic calming scheme could be in conflict with CIL and what can be delivered via a S106 agreement. For example a developer can only be asked to deliver something which is a direct result of the development - they cannot solve an existing problem.</p>	

Page No	Section	Comments	SDNPA Recommendation
		The development framework refers to the addition of a traffic island and associated road calming ramps. These measures would have a very urbanising effect and would not fit with the SDNP context. There may be other more suitable measures for traffic calming.	
39	Development sites	<p>HSG 7C – Jointure, 17 South Street</p> <p>This allocation reflects an existing planning permission. The permission was granted following the adoption of the Lewes JCS so the allocation can count towards the Ditchling housing target. Figure 3.3/6 shows a site area which includes land to the south of the ditch and adjacent to Clayton Road. This land was not included in the planning permission and a more accurate site boundary should be included in the NDP.</p>	Amend site boundary map
40-41	Transport	<p>Introduction</p> <p>It is recognised that issues of traffic are a prime concern to the local community and the SDNPA is committed to working together with East Sussex County Council and the local community to address some of the traffic and transport issues in Ditchling. We welcome initiatives from the local community to this end, where they contribute towards the purposes of the National Park. There may well be scope to make use of Community Infrastructure Levy to help fund appropriate measures to address the village's traffic problems. However, in order for a developer to be individually required to carry out these works, they would have to be 'necessary to make the development acceptable in planning terms, directly related to it, and fairly and reasonably related in scale and kind to the development' (s122 of the CIL Regs). We would seek ESCC views on these matters when an application is received.</p> <p>Paragraphs 6 and 7 of this section refer to aspirational policies contained in Part B of the Plan. It is considered to be potentially confusing and misleading to include the supporting text of these policies here in the main part of the Plan.</p> <p>The 8th paragraph refers to housing development on all four approaches to the centre of Ditchling. With the removal of some site allocations this is no longer the case – for example no allocations are proposed to the north of Ditchling centre.</p>	<p>Review supporting text</p> <p>Amend supporting text in light of final allocations</p>
42	Transl	Off street car parking	

Page No	Section	Comments	SDNPA Recommendation
		The SDNPA Planning Committee resolved to grant permission for a car park at this site on the 14 th September 2017.	
	Trans2	See previous comments on the requirements that can be made of development – these must be 'necessary to make the development acceptable in planning terms, directly related to it, and fairly and reasonably related in scale and kind to the development'. We recommend that the policy is reworded accordingly.	Amend policy wording
44	BIZ1	Retention of Local Shops – the second paragraph of this policy is not worded for the purposes of development management and would be better reworded as: “Proposals which ensure the retention of local shops and deter from conversions to non-retail or residential uses will be supported.”	Amend policy text
45	BIZ2	Support appropriate rural enterprise diversification – The beginning text of this policy would sit better in the supporting text. Recommend that the policy starts at “development proposals for farm diversification...” The policy includes a direct reference to an emerging South Downs Local Plan policy including the policy number which has changed since the drafting of the neighbourhood plan. We would recommend the reference is removed but the requirement for proposals to be ancillary to the farming operations is retained.	Amend policy text
47	CONS1	Permit development within established boundaries – this policy refers to development in the settlement boundary, an accompanying map of the proposed settlement boundary should be included here. The industrial estates should also be identified on a map. The policy refers to a 'material increase in the scale of existing development' – clarification of what this means is needed, for example does it relate to height / footprint / massing? It is also considered that this policy would sit better earlier on in the plan as it establishes the general principles of development in the plan area. In addition the policy includes repetition of Policy HSG3. As CONS1 relates to development within the settlement boundary we would recommend removing the text referring to St George's Park as this is covered elsewhere.	Include map of settlement boundary. Identify industrial estates on a map. Clarify policy wording Include policy at beginning of the plan Remove repetition of policy contained elsewhere in the plan
48	CONS2	Standards for design – it would be helpful if this policy also made reference to the design and treatment of boundaries as well as ensuring high quality, secure, accessible and where possible integrated storage for everyday life requirements.	Include reference to boundaries and external storage provision.

Page No	Section	Comments	SDNPA Recommendation
		Fifth bullet point should state: “links with established rights of way <u>where practicable</u> ”	
49	CONS3	<p>Protect heritage assets – we note aspiration HSG9 to prepare a village design statement as supporting guidance for developers on appropriate design criteria. In order to support the principles of this future guidance it would be helpful to include reference to the forthcoming VDS in Policy CONS3.</p> <p>Include additional policy text:</p> <p>“Development proposals will only be permitted if they demonstrate they have taken account of the guidelines in the any design guidance or code issued or adopted by the South Downs National Park Authority.”</p>	Amend policy text
49	CONS6	Extend conservation areas – This is not a land use policy for the purpose of development management and would be better included in Part B of the plan.	Move policy to Part B.
50	CONS7	<p>Conservation of landscape character and key views</p> <p>We would like to commend the group on the considerable work undertaken to understand the local landscape qualities and sensitivities which has led to the identification of key views and local landscape character areas included for conservation in the Neighbourhood Plan.</p> <p>We would suggest that the expression ‘priority given to landscapes in the National Park’ could be misinterpreted. Also national guidance protects the setting of the National Park therefore the following alternative wording is recommended;</p> <p><i>‘The distinctive landscape, views and scenic beauty of the neighbourhood plan area should be conserved and enhanced. The landscape of the South Downs National Park and its setting shall be protected in accordance with legislation, national planning policy, and planning policy guidance.’</i></p> <p>It would be helpful to name and list the key views identified in Fig.3.6/1.</p> <p>Local landscape feature ‘H’ is missing from the legend of Fig.3.6/2.</p>	Amend as suggested

Page No	Section	Comments	SDNPA Recommendation
		Figure 3.6/2 includes areas identified as the 'rural setting' of the three villages. It is not clear how these areas have been defined and clarification should be provided.	
51	CONS8	Protect important gaps between settlements Amend final sentence of policy to refer to the 'South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments'	
52	CONS9	Preserve dark night skies We welcome the support given to preserving the local area's dark night skies. This is fully in line with the National Park's status as International Dark Night Reserve. It is not necessary to refer to policies contained elsewhere in the Development Plan. We would also suggest that it is the quality of dark night skies the policy is seeking to preserve rather than the 'night time environment'.	Amend as suggested
56	CONS10	Protect and enhance habitats and biodiversity The first paragraph of this policy would better sit in the supporting text.	Amend as suggested
58	CONS11	Protect local green spaces A detailed description of each proposed LGS and analysis of the site against national criteria for LGS is provided in the supporting documentation under section 4. We consider this supporting evidence to be an example of best practice and a model for other neighbourhood planning groups.	
61-62	CONS12	Protect community open spaces There is a discrepancy between the site descriptions in the supporting documentation and Figure 3.6/7 and Table 3.6/7 with reference to Long Park Corner amenity space and Boddington's Lane community orchard.	Amend supporting documentation numbering for sites.
	Part B	The aspirational policies have been put in a separate section which is helpful although the name 'policies' could still cause confusion so we suggest they are renamed 'community actions' or similar.	Re-title 'aspirational policies'