

SDNPA response to the Bramber Submission Regulation 16 Neighbourhood Development Plan

18/05/2020

Ref	Comment	SDNPA Recommendation to Bramber Parish Council
General Neighbourhood Development Plan		
General Comments	<p>Bramber Parish Council, and all those closely involved with the Neighbourhood Development Plan, are congratulated for their hard work on reaching this stage of the process. It is clear a considerable amount of effort has been involved.</p> <p>SDNPA appreciates the efforts that have been made to take into account comments made by officers at Pre-Submission (Regulation 14) consultation stage to add clarity and consistency to the Bramber Neighbourhood Development Plan.</p>	<p>SDNPA congratulates Bramber Parish Council on the hard work and effort to reach this stage of the Neighbourhood Plan process.</p> <p>Consultation at previous stages of the process and the efforts made to take into account the comments of the SDNPA is appreciated.</p>
Introduction		
Para 1.15	<p>Paragraph 1.15 notes that “all new development needs to have regard to this setting (SDNP) and the views which would be created from surrounding hills.” Although we appreciate the NDP giving context to the National Park, it could possibly be revised and make reference to the South Downs Local Plan (SDLP) in order to achieve correct terminology.</p>	<p>Consider text re-wording and mention the adopted SDLP.</p>
5 Housing		
Para 5.5	<p>When referring to the National Park please ensure to capitalise. It could be helpful to note where the BNDP has quoted this text from in paragraph 5.5. The reference is Policy SD26: Supply of Homes, point 4 page 107.</p>	<p>Capitalise the words National Park and add reference to the SDLP.</p>
6 Design and Heritage		

Section 6	Previously we made comments regarding separating this chapter into two. However, the additional wording to paragraphs 6.1 – 6.3 helps set the scene for the historical context of Bramber, and how the Neighbourhood Planning group wants to see this reflected and conserved. It also highlights distinctive qualities and identity of Bramber, which is at the heart of the neighbourhood planning process.	No action
Policy B2	We appreciate the wording changes made to this policy, however there was one comment regarding suggested wording that we will think would still be beneficial for this policy. We believe that when development abuts the open countryside, development must provide a gradual transition from the built form and through a layout that will clearly minimise any visual impact. Consider rephrasing of the sentence “...open countryside, or it could be through a layout...” to “... <i>open countryside and through a layout...</i> ”	Review policy wording.
Policy B3 – point H	Point H comments on the requirement to provide SuDS for development sites. Our only point would be that requiring SuDS on site is a little unusual in nature, as it’s usually easier to put measures within the ‘red line boundary’ of a site. There is mild concern that the term “...a wide range of <i>creative</i> SuDS...” could be considered subjective. Overall the requirement to demonstrate biodiversity enhancements is a good addition.	To note
Policy B3 – point I	The additional point I that had been added to the policy reads more like a statement than policy. I am also unclear to what the intentions of this point is within the policy and what it is hoping to achieve.	Clarification on this point.
7 Environment and Countryside		
Policy B5	This policy is well written and we thank the neighbourhood planning group for the reference to the SDNP. However, it would be helpful to also reference the landscape qualities, and the highest status of protection of the National Park.	Possible amendment of text
8 Transport and Movement		

Policy B10, point 3	This paragraph is an understandable aspiration for the Neighbourhood Development Plan, however it may be more suitable as an 'Action Point, or Aim' than a land use policy. This would need to be supported and provided by Highways. It may be worth exploring where else this can be situated outside of a policy within the plan.	Removal or relocation of this section of the policy.
Paras 8.9, 8.10	<p>Comments were made by officers at Regulation 14 pre-submission stage, we would like to reiterate what was said previously in terms of the parking site along Bostal Road. Paragraph 8.10 also notes "further discussions taking place with the South Downs National Park Authority." From speaking with colleagues, there hasn't been any discussions that have taken place yet, and we would very much like to have a chance to speak with the Parish Council.</p> <p>Paras 8.8 to 8.11 highlight the issue of car parking within the Neighbourhood Area, especially for access to the South Downs Way and for enjoyment of the South Downs National Park. However, there are certain concerns over the site mentioned in Fig 8.4 '<i>Broad location for improved to existing rough parking area along Bostal Road.</i>' On this map the track has been marked 'Byway 2020' however it is in fact a "Restricted Byway 2020." Officers understand that people may use this area informally for parking but we would have concerns about this being formalised or enlarged in the NDP</p> <p>The site is on an open elevated hillside, cars parked at this proposed location (as shown in fig 8.4) can be easily seen from across the valley to the East from locations such as Beeding Hill and Truleigh Hill especially if the sun is shining and glinting off of the windscreens.</p>	Removal of Fig 8.3 and para 8.10 from the plan.
Policy B11	Officers are broadly supportive of Policy B11 but would remove the map reference to 8.3 and on the policies map, (previously map 8.4 now 8.3)	Removal mention of 8.3 from reference and policies map.
Site Bramber 2: Land south of Kingsmead Close		

Site 2	<p>As previously commented at the Regulation 14 stage, there has been an update to the planning history of Site 2: Land at Kingsmead Close. The NDP group may wish to update the planning history in Appendix A site assessments.</p> <p>In regards to site 2 in the site assessments, there is an update to the site planning history, The site currently has a pre-application advice published on the 22 October 2019, the link to this can be found here - https://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PVXBDPTU03300</p>	Possible update to planning history in site assessment.
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