

## SDNPA response to the Bramber Pre-Submission Neighbourhood Development Plan

01/11/2019

Ref	Comment	SDNPA Recommendation to Bramber Parish Council
<b>General Neighbourhood Development Plan</b>		
General Comments	A significant part of the South Downs National Park (SDNP) lies within Bramber Neighbourhood Area. We welcome the mention of the importance of the National Park to the village and the mention/conformity of the adopted South Downs Local Plan.	N/A
General comments	Throughout the plan there are interchangeable acronyms; NP and NDP to represent neighbourhood development plan. We suggest using NDP so to not confuse with 'National Park'.	Use of a consistent acronym when referring to the Bramber Neighbourhood Development Plan or Neighbourhood Development Plan; BNDP/NDP respectively.
General comments	Throughout the plan there are useful maps to visually represent policies, however it would be useful if the planning areas for Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA) were additionally represented on these maps. We note the boundary of the SDNP is shown on the policies map (Fig 14.1 on page 56 and Fig 14.2 on page 58). We have mentioned this at the beginning as a general point instead of repeating it in every section that it is applicable.	Additional of the HDC and SDNPA boundaries to maps; Fig 4.1 page 18, Fig 6.1 page 23, Fig 7.1 page 31, Fig 7.3 page 34, Fig 7.4 page 36, Fig 8.1 page 38.
General comments	A small comment regarding the continuity of formatting, for example Policy B2 is written all in upper case, whereas Policy B3 is written in upper and lower case. The only recommendation is to make the plan consistent throughout and accessible.	N/A
<b>3 Vision and Objectives</b>		

Para 3.3	Page 14 Neighbourhood Plan Objectives. We welcome the references to the qualities of the landscape setting (Objective one), safeguarding local green spaces and enhancement of biodiversity (Objective seven) however there is no mention to the SDNP and its special qualities. Although we welcome these objectives, we would like to see reference to the SDNP, as a lot of the qualities that are mentioned are within the National Park. This objective should also include landscapes, with particular reference to the South Downs, a landscape of national importance, the primary purpose of which is to conserve and enhance its natural beauty, wildlife and cultural heritage.	Amend text to include reference in this objective to the nationally important landscape character of the South Downs and its special qualities and the need to conserve and enhance its natural beauty, wildlife and cultural heritage.
<b>4 Spatial Strategy</b>		
Para 4.8	Para 4.8 refers to Policy B1 reinforcing the BUAB for Bramber, I don't think this sentence necessarily adds anything to the plan and is rather confusing to what it means. It may refer to the map on the following page, but we suggest that this is clarified.	Clarification (or possible deletion/relocation) of para 4.8 on page 17.
<b>5 Housing</b>		
Para 5.2	When referring to the South Downs National Park Authority as a planning authority, please make sure to refer to SDNPA and when referring to the National Park the South Downs National Park or SDNP.	Amend text to add 'Authority' (or SDNPA) at the end of para 5.2
Aim 1	Page 21 'Prepare for an early review of the plan' – the only comment officers from the SNDPA have is to please be kept informed of any conversations regarding reviewing or updating the BNDP.	
<b>6 Design and Heritage</b>		
Para 6.1	It could be useful to separate Design and Heritage into two separate chapters. Whilst we understand this has been done to demonstrate how there is a great deal of history within the neighbourhood area that the qualifying body wish to highlight,	Possible separation of the Design and Heritage chapter 6 into two separate chapters. Possible relocation of the Heritage chapter within or

	it could be useful to separate Design and Heritage into two chapters. Whilst we understand this has been done to demonstrate how the history within the neighbourhood area and development contributes to the local character, this chapter could be more useful within an area of the plan with a similar context e.g. Chapter 7 as there is a bit of overlap within these policies.	following chapter 7 (Environment and Countryside).
Policy B1, page 19	Policy B1; Location of development omits the visual impact development can have in terms of landscape character. The SDNPA understands the use of this policy to help guide the location of possible small scale future development, however, impacts on the National Park are not highlighted when referring to respecting appropriate uses in the countryside or factors to consider when locating development.	Review policy wording.
Policy B1, page 19	Point 1 “Development in the neighbourhood area will be <i>focused</i> within the Built up area boundary”, consider change of use of ‘focused’ to “ <i>will be permitted</i> ”.	Amend text to say: “...in the neighbourhood area will be permitted within the BUAB”
Policy B2	The purpose of policy B2 is welcomed by officers, however the wording ‘preserve and enhance’ is typically associated with the Listed Building and Conservation area Act. It may be more appropriate for the wording to be in line with the adopted SDNPLP policy SD12 ‘Historic Environment’.	Amend text to reflect the wording in the SDNPLP policy SD12; replace ‘preserve and enhance’ with ‘conserve and enhance’.
Policy B2	Point 2 bullet a, consider replacing the word ‘impact’ with the word ‘appearance’.  Point 2 bullet b, consider replacing the word ‘significantly’ with the word ‘significant’.  Point 3, the end of the first sentence, consider adding the word ‘ <i>adverse</i> ’ or ‘ <i>detrimental</i> ’ after “...expected to mitigate any”  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.

Para 6.7	Para 6.7 Design of development on page 25 refers to the governments 'Building for Life' from 2015, which are now a little dated. The qualifying body may wish to consider looking at the BREEAM standards in regards to the construction of new homes and replacing the Building for Life references: <a href="https://www.breeam.com/discover/technical-standards/communities/">https://www.breeam.com/discover/technical-standards/communities/</a>	Qualifying body may wish to replace references to Building for Life with BREEAM new build construction standards.
Policy B3	Page 26 Design of Development is a well written policy, however, there is no mention of sustainable transport and provision of cycle parking within any new developments. Sustainable transport is a key component in reducing the need to travel and dependence on fossil fuel use, encouraging low carbon modes of transport to help reduce emissions. Bramber and the surrounding settlements are well connected to the South Downs Way and the safeguarded route in the SDLP policy SD20; 'Downs Link 'from Guildford to Shoreham-by-sea.	Add in references to sustainable transport and cycle parking provision within new developments. Could possibly add reference text to sustainable transport following the policy.
Policy B4	Policy B4 is welcomed by officers but currently it is absent of measurable/targets for new developments. This is not mandatory, however, it could be worthwhile setting minimum achievable standards such as policy SD48: Climate Change and Sustainable Use of Resources point two for residential developments. Currently it is not obvious how these requirements can be quantified.	Consider setting measureable targets/minimum standards for energy efficiency similar to the SD48 Local Plan Climate Change and Sustainable Use of Resources.
<b>7 Environment and Countryside</b>		
Policy B5	Policy B5 is welcomed by the SDNPA and has mirrored principles from paragraph 5.70 Biodiversity section from the adopted SDLP and policy SD9 Biodiversity and Geodiversity point b. The only point we would comment on is the wording "...should contribute to achieving net gain in biodiversity" in the first sentence of point one. This could be strengthened to "are expected to achieve net gain", however this is only a minor point.	Consider rewording of initial sentence of policy.
Policy B5, point 1b	Point 1b on page 30 refers to replanting trees in new developments, in the first sentence it says "...with new plantings, native or <i>semi-native</i> varieties..." We would suggest that locally appropriate trees would be a better amendment to this policy.	Amend point 1b to remove "or semi native" and replace it with "...native or <i>locally appropriate</i> ..."

Policy B7	<p>Officers note the Protection and maintenance of Local Green Spaces policy designation for Clays Field, and have the following comments. This designation is not within the SDNP but relates to the wider landscape character and setting. The site could offer potential benefits as it stands by offering an important gap between Bramber and Steyning, by conserving the characteristic pattern and contributes positively towards the setting of the National Park.</p> <p>It also positively contributes to the setting of the Grade I listed Bramber Castle. The visual links provided by the open space contribute significantly to the sense of place for locals and their perceived connection with the Downs and by virtue the National Park.</p> <p>The key policy question for this draft designation, is for the qualifying body to decide if this open space is demonstrably special.</p>	No action/small clarification
<b>8 Transport and Movement</b>		
Para 8.6	<p>Page 38 refers to upgrading an existing crossing to the A283. We appreciate this is a locally important matter and would suggest that the qualifying body adds in additional text regarding the Community Infrastructure Levy (CIL), which may be able to help deliver this in the future.</p>	Add additional text mentioning the possible use of CIL to help deliver the upgrade to the existing A283 crossing at Castle Lane between Steyning and Bramber.
Para 8.7	<p>Officers are unsure if this is a reasonable request to cover all major developments, as assessments should be done on a case by case basis. The current wording would be in conflict with the section 122 of the CIL Regulation 2010. It would be more advisory to word this paragraph to suggest CIL funds from the Parish pot may be used on projects in the neighbourhood area.</p>	Amend text to be in conformity with the 2010 CIL Regulations. Rewording of the text should highlight that CIL funds from the Parish pot can be used to prioritise projects in the area.
Policy B10, point 3	<p>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.</p>	Removal or relocation of this section of the policy.

Policy B10, point 4	There is legislation that currently protects Public Rights of Way which cannot be stopped or diverted unless a new route is agreed via a Section 257 (diversion or extinguishment of public right of way). So the legislations already protects these important routes meaning that it is not necessarily needed to be covered by the Neighbourhood Development Plan.	This policy is already covered by National Legislation so can be deleted.
Paras 8.9, 8.10	<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 <i>'Byway 2020'</i> 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> <p>There is another informal parking area about 1km south along the same road and is still within the parish. It is located at the top of Annington Hill and well connected to the Right of Way network. Although this site may present some landscape issues, there could be more of a possibility of mitigation here that could be worth exploring,</p>	<p>Removal of Fig 8.4 and para 8.10 from the plan.</p> <p>Explore the potential and mitigation of site located near Annington Hill.</p>
Policy B11	<p>Officers are broadly supportive of Policy B11 but would remove the map reference to 8.4 and on the policies map.</p> <p>Point 4 of this policy comments on e-bike charging and electric car charging may be desirable in the village. Although this is an understandable aspiration, it may be</p>	<p>Removal mention of 8.4 from reference and policies map.</p> <p>Suggest change of wording from "...will also be required" to "Should also be considered."</p>

	unobtainable due to the very rural location. Consider more suitable wording of this policy.	
Policy B12	Although development is not likely to be within the SDNP, parking courts can be much more preferable especially in farmstead type developments. Formal parking spaces can be very urbanising and would suggest re-ordering of the policy to put points relating to sustainability first. All parking should be sensitively designed and simply screening developments is not advisory.	Suggest re-ordering of policy to put sustainability points first.
<b>10 Local Economy</b>		
Policy B15	Officers find this policy quite leniently worded in its marketing requirements. Although this could be because the qualifying body are not expecting development to come forward in the SDNP, however the current wording in the SDNPLP is stronger. It should be noted that Policy SD35: Employment Land is a strategic policy with which the NDP should be broadly consistent. It could be worthwhile for the BNDP to consider similar requirements as set out in Appendix 3 of the SDLP.	Suggest looking at SDNPLP policy 35; Employment Land (page 130) and marketing requirements for change of use applications can be found in Appendix 3 (page 287).
<b>13 Non policy actions</b>		
Ref 13.1	Small note regarding the table commencing on page 52, the Design and Heritage section doesn't seem to have any, I am not sure if this is intentional but should possibly be clarified.	Small clarification.
<b>Site Bramber 2: Land south of Kingsmead Close</b>		
Site 2	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 - <a href="https://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=PVXBDPTU03300">https://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=PVXBDPTU03300</a>	Possible update to planning history in site assessment.