

**Consultation Statement for the
Albourne Parish Neighbourhood
Plan**

September 2015

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1. INTRODUCTION

This report has been prepared for, and on behalf of, Albourne Parish Council (APC). It is in support of their preparation of the Albourne Parish Neighbourhood Plan (APNP).

As part of the formal submission of the Neighbourhood Plan (NP) for Examination, there is a requirement for a Consultation Statement to be submitted in order to comply with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

This Consultation Statement provides a summary of all responses received as part of the consultation undertaken in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. It also includes a summary of consultations undertaken in the lead up to the Regulation 14 consultation. This illustrates the level of public engagement undertaken at each stage of the process and how stakeholder consultation positively helped shape the NP. This statement has been prepared in order to illustrate compliance with Regulation 14 & 15.

The aim throughout the preparation of the NP has been to ensure widespread public and stakeholder engagement, to ensure that as far as possible, the NP responded to the wishes, ideas and concerns of the local community and other stakeholders.

This statement has been prepared in accordance with, and cognisant of Statutory Instrument 2012 No. 637, The Neighbourhood Planning (General) Regulations 2012.

For the purposes of this report, please note the Neighbourhood Plan (NP) is also used to refer to Neighbourhood Development Plans (NDP).

2. BACKGROUND

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 requires the submission of a Consultation Statement to the Local Planning Authority to explain the process that has been followed in liaising and consulting with local residents and stakeholders in the preparation of the NP:

Regulation 15(2) states that the consultation statement means a document which:

- (a) *Contains details of the people and bodies consulted about the Proposed Neighbourhood Development Plan;*
- (b) *Explains how they were consulted;*
- (c) *Summarises the main issues and concerns raised by those consulted; and*
- (d) *Describes how these issues and concerns have been considered and where relevant addressed in the proposed Neighbourhood Development Plan.*

This statement summarises all those who were consulted as part of the Regulation 14 Consultation, detailing how they were consulted and summarising the responses received. Each draft policy of the NP is assessed in terms of the comments received from consultees. If policies have been amended as a result of feedback, the reasoning for this is noted. If the policies remain, a justification is also provided.

This formal process relates to the Regulation 14 consultation and the legal requirement to fulfil this stage. Another purpose of this statement is to provide a greater level of detail about the public consultation which has been undertaken to front load the preparation of the NP leading up to the Regulation 14 consultation exercise.

APNP have sought to ensure that at each stage of the production of the NP, local residents and businesses have been actively consulted and their views sought. This process began prior to the production of the NP and dates back to 2012 with the production of Parish Survey.

The process has canvassed a wide range of stakeholders and the NP has been shaped to meet the aims of local residents and respond to key themes and objectives of the local area. The NP has been mindful of the Mid Sussex District Council (MSDC) Local Plan (MSLP), District Plan (MSDP) and the NPPF.

Information has been made widely available and people have been encouraged to formally respond. Information has been published by way of mail drops to all local residents, updates on the APC website and notice boards, public meetings on key topic areas and public exhibitions.

APC have also sought to liaise closely with MSDC, the South Downs National Park Authority (SDNPA) and Department of Communities and Local Government (DCLG) to ensure that the appropriate steps were being followed.

Background baseline data has been methodically gathered, to ensure that key constraints and opportunities were understood about the Parish and wider area. A Scoping Report for the Sustainability Appraisal (SA) was prepared as part of the early consultation process. The SA (incorporating requirements of the Sustainable Environmental Assessment) was then prepared in tandem with the draft NP policies to ensure that at every stage the most sustainable options were sought and has been routinely updated.

The NP, which was prepared for the Regulation 14 Consultation, was prepared, informed and considered by local stakeholders at every stage of preparation. As this statement will illustrate, the NP covers local issues and responds to local concerns and ideas. The NP is a document that sought to achieve local ownership through the consultation process and provide an aspirational platform for local issues to be positively advanced by policies within the NP.

3 THE PLAN PREPARATION PROCESS

The Plan preparation process has been led by Albourne Parish Council through its Neighbourhood Plan Steering Group. The Group has acted as a key means of compiling the evidence base, engaging with the local community and testing the suitability and acceptability of its emerging policies and proposals. The process of preparing and seeking final adoption of the Neighbourhood Plan (General) Regulations 2012 and has been agreed by Albourne Parish Council. The intention of the Parish Council is to submit the Neighbourhood Plan in October 2015 with a view to the Plan being determined as being in general conformity with the Local Plan and emerging District Plan and therefore ready for examination.

The process up to Submission has comprised a number of stages:

Collection of baseline evidence and consultations and development of a pre-submission Neighbourhood Plan and a draft Sustainability Appraisal. These documents set out the objectives policies and proposals for the Plan area and an assessment of the policies' sustainability and were subject to a six week public consultation period in 2014.

Submission Neighbourhood Plan. This document takes into account the representations received on the Pre Submission Plan and has been amended as necessary before submission to the District Council, accompanied by a revised Sustainability Appraisal report, a Basic Conditions Statement and this Consultation statement.

If approved by the District Council, the Neighbourhood Plan will then be subject to an independent Examination. Any recommendations made by the Examiner will be considered by the Parish and District Council and the Plan again amended before being approved for a local referendum. If supported by a majority vote at the referendum, the Neighbourhood Plan will be adopted by Mid Sussex District Council as planning policy for Albourne.

Neighbourhood Plan Group

The Parish Council resolved to commence work on a Neighbourhood Plan in the autumn of 2011. A Neighbourhood Plan Group was set up consisting of three Parish Councillors reporting back regularly to the full Council.

Designation of Neighbourhood Plan area

Albourne Parish Council is a Qualifying Body and as such is able to lead the preparation of a Neighbourhood Plan. The formal designation of the Parish as a Neighbourhood Planning Area was agreed by Mid Sussex District Council on 16th July 2012.

Working with MSDC and neighbouring Parishes.

Extensive support and advice has been provided by Mid Sussex District Council including training and briefing sessions on neighbourhood planning as well as individual meetings and communication with officers. Neighbouring parishes have been consulted with regular exchanges of information.

4. COMMUNITY ENGAGEMENT AND CONSULTATION

This section provides an overview of the consultation process undertaken by APC prior to the formation of the APNP

Parish Questionnaire – March 2012

The public engagement included a questionnaire distributed to all 263 households within the Parish, in early March 2012.

This document covered a range of housing, social, environmental and economic issues, as well as providing freeform sections to allow respondents to raise any issues or concerns. The document offered a range of policy positions and options which reflected APC's contemporary view on development, land use, housing and other issues. The information provided APC with an overview of issues of importance to local residents and objectives that any future NP might need to address.

The questionnaire generated 52 respondents (19.8% response rate) with respondents making over 150 freeform comments,

The results can be summarised as follows.

That the identity of the village should be preserved met with universal support (100%) as did the need to protect the best quality land surrounding the village.

The requirement to maintain identity/local gaps between Albourne and other villages was heavily supported (96%) and there was strong resistance to "ad-hoc" residential development (88%)

A suggested number of new dwellings to be delivered over the plan period met with strong support, with those opposing split between those supporting less and those supporting more.

An "affordable housing" element at 30% met with majority support (73%) with almost 40% of those opposing suggesting a higher percentage.

A question relating to the desired size and type of housing offered valuable input and opinions generally favouring smaller and mixed size developments

A request for the identification of brownfield sites for potential use as housing plots generated a range of possible sites which were added to APC list of sites for evaluation. Eight of the thirteen sites put forward are or were greenfield sites.

The questionnaire outlined APC's approach to building in the countryside (and approach in line with the policies within the MSDC Local Plan). This approach met with a 96% approval rate.

The questionnaire sought views on 3 possible sites for residential dwellings (These three sites having previously been identified as part of an exercise in conjunction with MSDC). A small majority approved of all three sites and 7% of respondents rejected all three sites. It was apparent that there were significant levels of disapproval of the use of the allotment site with 28% rejecting it outright.

The questionnaire sought views of further commercial/industrial development on greenfield sites. 94% of respondents opposed this.

Support was sought for APC's position of support for the emerging MSDC Local Plan and this met with high (88%) support.

Consultation Methodology

The consultation process involved public meetings and discussions with the option to leave feedback. Meetings were also held with representatives of local landowners and developers. Information was regularly distributed on Parish newsletters and at Parish noticeboards and via the Parish website.

Meeting and exhibitions took the form of presentations, followed by discussion. Those attending were able to ask questions of Parish Councillors and discuss issues.

Public Meeting - The Neighbourhood Plan (May 2013) Summary of Key Points

This meeting was organised to coincide with the Annual Parish Meeting on 15 May 2013. It was attended by 31 local residents. Having undertaken several months of public consultation, APC now had a good understanding of key issues which would need to be addressed by the NP. Through discussions with MSDC, they were also aware of the likely amount of housing that the Parish might need to allocate through 'fair share'.

During the initial consultation stage, MSDC had written to all local Parish Council's identifying an approximate amount of housing that rural Parishes would need to accommodate as part of the emerging MSDP. This was raised at the meeting and discussed by those attending. As a result of this it was agreed that a document setting out potential development sites should be produced.

The key visions, objectives and topic areas were confirmed as:-

- **Objectives/Themes**

It was clear from the feedback that there was a desire to protect settlement identity and prevent coalescence with neighbouring villages. Concerns about the number of school places locally and the pressure that might occur with new houses was also considered to be important. Congestion in the centre of the village and traffic issues in other parts of the Parish were also a key concern and aims to deal with this were strongly supported.

Strategic Objectives garnered less discussion. The Parish Council also explained that these needed to accord with the aims of the NPPF and emerging policy in the existing MSLP & draft MSDP.

- **Countryside, Wildlife & Environment**

The importance of agriculture and protecting the countryside was an important issue to local residents. There was concern about new housing developments, but an understanding that some countryside would need to be allocated. The careful buffering of any new developments would be important, as well as protecting important ecological sites and the creation of new habitats. The most valued agricultural land and landscapes needed to be protected.

Housing

The most discussed topic area. Varied and mixed views were expressed but there was a clear understanding forged during the process that new housing was inevitable and the need was to positively plan for development. Local residents concluded that this ensured the decision about location and overall amount would not be taken out of the hands of locals. Stakeholders felt it was sensible to follow MSDC 'fair share' methodology, but review different growth scenarios to assess overall need.

- **Economy**

One of the less commented on topic areas, and response from local business was low. It was though recognised by respondents that local employment played a valuable part in the parish economy.

- **Transport & Highways**

There was popular support for the idea of looking to deal with congestion in various parts of the Parish. This included looking for a new parking area to serve the school traffic. Many residents were concerned about a lack of bus services to more rural areas.

- **Housing**

Residents were particularly concerned about the location and quantity of new housing, the impact on school places, highways and the design and appearance of new housing. There was concern about development leading to coalescence with the neighbouring villages and of development impacting negatively on the Village conservation area.

In terms of housing numbers, there was a desire to retain a village feel and also protect important countryside around the village.

PREPARING THE DRAFT NP (MAY 2013 – MARCH 2014)

The next step following the public exhibition was to formally agree the preferred housing sites and number of houses to be delivered. A draft ‘first’ version of the APNP could then be prepared.

The Sustainability Appraisal (SA), which was being developed in tandem with draft policies was able to assess different options for housing numbers based on different projections for need in the Parish.

Given the main objective and the key issues raised by stakeholders, it was agreed that the NP should be divided up into Countryside, Amenity, Housing, Economic and Transport policies. This would ensure specific topic areas would respond to the overall vision and key aims. The summary of responses from the public exhibition was then used to form the basis for workable policy areas.

5. REGULATION 14 CONSULTATION

In light of consultation, collation of thematic issues and associated analysis, the Consultation Draft of the NP was prepared and published for consultation between 12th July 2014 and 23rd August 2014. Following input from and discussion with MSDC, a number of changes were made to the Consultation Drafts and this was re-published for consultation between 13th October 2014 and 24th November 2014. comprising the formal Regulation 14 Consultation.

Set out below, and in accordance with Regulation 15(2) (a), (b) and (c), are the details of those who were consulted, an explanation of how they were consulted, and a summary of the main issues raised by the consultees.

DETAILS OF THE PEOPLE AND BODIES CONSULTED ABOUT THE PROPOSED NEIGHBOURHOOD DEVELOPMENT PLAN - 15(2) (a).

APNP worked with MSDC and the SDNPA to contact all statutory consultee's, interested bodies and neighbouring authorities. Additionally

The following were contacted directly by the Parish Council from a contact list provided by MSDC:

- Hurstpierpoint & Sayers Common Parish Council
- Poynings Parish Council
- Twineham Parish Council.
- Woodmancote Parish Council
- BT,
- Cable & Wireless,
- Energis Communication,
- English Heritage,
- Environment Agency,
- Highways Agency,
- Homes & Communities Agency,
- Mid Sussex District Council,
- National Grid,
- Natural England,
- Network Rail,
- Npower,
- RPS Planning,
- South Downs National Park,
- South East Coast NHS,
- South East Water,

- Southern Gas Network,
- Thames Water,
- The Coal Authority,
- UK Power, and
- West Sussex County Council.

HOW WERE THEY CONSULTED? – 15(2) (b).

Copies of the Consultation Draft Neighbourhood Plan were held at Albourne Village Hall and paper copies were available on request. Copies were also sent to MSDC and the SDNPA. Details were posted on the APC website and put up on village notice boards.

The statutory bodies were all contacted via e-mail, with an electronic link to the documents and details of the consultation period.

6. SUMMARY OF MAIN ISSUES AND CONCERNS RAISED BY THOSE CONSULTED AND RESPONSES – 15(2) (c)

The following is a list of the key issues and concerns raised by each individual respondent to the Regulation 14 consultation

1. Van Vliet family - Date 15/7/14.

Email in support of Council's aim E2 to provide faster and better Broadband, outlining the issues and suggesting ways to achieve this.

2. Elizabeth Cleaver on behalf of the Highways Agency - Date 31/7/14.

Email stating "We do not have any comments at this time".

3. Amanda Purdye on behalf of Gatwick Airport Limited - Date 5/8/14.

"No concerns with regard to aerodrome safeguarding and the neighbourhood plan". A request to be notified if any future proposals for wind turbines in the Parish. See also Ref. 15 below for repetition of the above comments in respect of the second Consultation Draft.

4. Lucy Howard on behalf of South Downs National Park Authority - Date 5/8/14.

The SDNP Authority has provided a range of helpful and constructive input on most areas of the Plan. *Note - For clarity and to avoid duplication, we have combined this input with the further input received on 24/11/14 as a result of the second Consultation Draft dated September 2014. This is shown below under No. 22 of this document.*

5. Councillor Norman Webster, Mid Sussex District Council - Date 5/8/14.

Cllr. Webster sets out three general recommendations:

- A. that amendments are made to the working of some policies and supporting text contained within the Plan
- B. that policies within the Neighbourhood Plan should be worded in such a way to guide decision making and that they relate specifically to land use.
- C. the Sustainability Appraisal could be strengthened particularly in relation to monitoring indicators and in the comparing of alternative options.

Note - The detail behind these recommendations is contained in an email dated 7/8/14 from Mr. Mark Bristow, Neighbourhood Planning Officer of MSDC which is reported in No. 12 below.

6. Ms. Debbie Quirk, Homes and Communities Agency - 11/8/14.

The Agency reports "no asset holdings" within the Parish. The Agency "supports the principles contained within Neighbourhood Plans in relation to the creation of successful places by increasing the supply of housing and jobs and ensuring that these meet the needs of the local community..."

7. Ms. Clare Gibbons, Southern Water - Date 14/8/14.

The respondent notes the omission of specific policies relating to "new or improved infrastructure to support development". That the Parish Council is not the planning authority in relation to wastewater development proposals is recognised, but it is suggested that support is required at all levels of the

planning system. Accordingly two specific policies are put forward for inclusion in the Plan.....“New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community” and “New residential and commercial development will be permitted only if sufficient infrastructure capacity is either available or can be provided in time to serve it” Note - See also No. 17 below for identical representations made in respect of the second Consultation Draft.

Response – The first suggested policy will be added as an Aim in the Amenities section and the wording of the second suggested policy will be incorporated into the relevant development policies.

8. Mr. Steven Hoyles, on behalf of Hurstpierpoint Parish Council - 14/8/14.

Comment states “we wholly support your Plan”. Additionally the representation suggests that “some greater capacity should be made at the Albourne Primary School, to meet the growing demands from your village and that of Sayers Common over the Plan period”

9. Mr. John Lister, on behalf of Natural England - 14/8/14.

Comments welcome “the commitment to protecting and enhancing the environment, the recognition of the importance of the National Park and its setting, and the modest scale of proposed development”. The representation requests more clarity over the location of the housing sites. *Note – A map showing the location of the housing sites was included in the second Draft Consultation document dated September 2014. See also No. 18 below for additional comments by Natural England in respect of the second Consultation Draft.*

10. Mr. David Wilson of Savills, representing Thames Water - 15/8/14.

No comments as Parish lies outside of the operation area of Thames Water.

11. The Environment Agency - August 2014.

No specific comments on the Plan were given but a copy of the Environment Agency Mid Sussex District Council Neighbourhood Plan checklist was provided and will be re-reviewed against the Plan. *Note - see also No. 14 below for repetition of the above in respect of the second Consultation Draft.*

12. Mr. Mark Bristow, Neighbourhood Planning Officer, Mid Sussex District Council - 14/7/14.

This representation put forward a wide range of recommendations relating to formatting, policy wording and documentation. In a subsequent meeting with Mr. Bristow, these recommendations were accepted, and it was agreed that a further draft consultation period would be appropriate after the key recommendations had been included in the plan. (These changes were shown as an appendix in the revised Consultation Draft Neighbourhood Plan of September 2014.)

13. Mr. Chris Owen, West Sussex County Council - 22/8/14. Policy/Aim = General.

In addition to providing general information and available WSCC documentation, the representation comments that the aims contained in Section 6 (Transport) are “broadly in line with County Council policy and offers guidance on how these might be moved forward.

Response – guidance noted and on file

NOTE – The representations on the prior pages were received prior to the 24th August 2014, the end of the consultation period for the first Consultation Draft Neighbourhood Plan. The representations on the following pages were received in response to the revised Consultation Draft Neighbourhood Plan of September 2014.

14. Environment Agency - 16/10/14.

Repeated comments, as No. 11 above.

15. Gatwick Airport - 27/10/14.

Repeated comments as No. 3 above.

16. Ms. Leanne Bannister, Woodmancote Parish Council - 7/11/14.

Acknowledgement of consultation received. No further comments made.

17. Ms. Clare Gibbons of Southern Water - 19/11/14.

Submission repeats representations made in respect of the first Consultation Draft. See No. 7 above for proposed policies.

18. Ms. Catherine Tonge of Natural England. Date - 21/11/14.

Submission makes recommendations to strengthen Countryside protection policies, including additional tests for the impact of development on biodiversity habitats and sites. See also No. 9 above.

Response – Comments accepted and relevant policies amended

19. Ms. Elizabeth Cleaver of the Highways Agency - 24/11/14.

No comments to offer.

20. Mr. Peter Rainier of DMH Stallard, representing a number of landowners and developers - 24/11/14.

This submission states that the Plan is “not positively prepared in National Planning Policy Framework (NPPF) terms (as required at para 16 and 184 of the NPPF” and “The Plan should include a policy which sets this out”. The submission further states that “The Sustainability Appraisal needs to be a fixed document upon which the plan has been prepared/assessed (See para 2.3)”

Response – APC considers the Plan to have been positively prepared. With regard to NPPF policies, the intention of the Plan to support the MSDC Local Plan is evidenced by reference to and compliance with the saved policies of the 2004 Mid Sussex District Plan; it is intended to state a probable requirement for an early review of this plan upon delivery of the MSDC Local Plan. APC considers that the policies in the Plan positively support local development, particularly relating to new housing sites and the positive policies in the plan relating to local businesses and the economy. It does not consider that the plan is more restrictive than the MSDC 2004 Local Plan nor is likely to be so for the new emerging Plan.

Policy C4 – spelling error

Housing chapter – The submission states that this section is “outdated” and “not positively prepared” and that there is no clear justification (in Section 4.1) for limiting the range of additional housing units to a range of 12 to 36. It is further stated that, in any case, this range is excessive and that there is no explanation as to why 18 is the suggested target in Policy H1.

Response – APC considers that its methodology for both range and final number is sound, given its use of various recognised and widely-used social, demographic and economic indicators overlaid with specific need information from the Parish Housing Survey and the MSDC Common Housing register. A total expected housing number for the entire Plan period will be shown in the Submission Plan. The number will include dwellings constructed in the early stages of the Plan period; projections for both future site specific dwellings and an expected number of “windfall” dwellings during the balance of the Plan period.

Policy H1 – The submission comments on this policy as follows – “Policy H1 indicates 18 dwellings over a plan period to 2031, but of the 15 listed in policy H4, 13 already have permission are being/have been constructed. Therefore, the plan is only allocating 2 dwellings. The submission suggests that other sites should be seriously investigated and goes on to suggest a range of “brownfield” sites quoting support from Plan policy H2.

The submission puts forward several sites for investigation and these are shown overleaf, together with responses

The Barn at the Nursery Church Lane

Response - Albourne Parish Council has previously supported the replacement of the large structure on this site with a single dwelling. We have chosen not to include or specify what we regard as single dwelling sites in the plan. However, we recognise that some may come forward in the balance of the Plan period and contribute to our expected number of windfall dwellings.

Land north of Softech House

Response - This site has not been considered or evaluated by APC as it forms the car park for the businesses occupying Softech House and adjacent offices. Whilst the site has some similarity to the developed site to the south of Softech House, it is smaller and is not “largely surrounded by built development”. The developed site has housing to the south and west, Softech House to the north and the B2118 to the east. This suggested site again has the B2118 to the east and Softech House to the south, but to the north and west the site bounds the MSDC owned woodland belt, informal footpaths and the Village Green/Recreation Ground.

Land south of the Gospel Hall

Response – APC has consistently opposed development on this site despite its inclusion in the SHLAA. This site was also put forward in response to the Neighbourhood Plan Parish Questionnaire. The site was formally evaluated in May 2012, where it failed on three of the four segments of the principles based site selection criteria, and again during the Site re-evaluation exercise in July 2012. The site is not a brown field site (this part of the site is now occupied by the Gospel Hall); the site is detached from the Village built up area boundary and development would extend the village very significantly to the south. Additionally the land is high quality horticultural land.

Land at The Yard, London Road.

Response – This site was put forward in response to the Neighbourhood Plan Parish Questionnaire and was evaluated and re-evaluated as with the site immediately above. APC disputes the brown-field status claimed but in any event the site lies well away from the Village built up area boundary and extremities, adjoining an area of sporadic rural development and lies within the Albourne/Hurstpierpoint Local Gap.

Land at The Oaks, Henfield Road

Response - Albourne Parish Council has previously supported the conversion of a single building on this site to residential use. We have chosen not to include or specify what we regard as single dwelling sites in the plan. However, we recognise that some may come forward in the balance of the Plan period and contribute to our expected number of windfall dwellings.

21. Ms. Gemma Brickwood of Boyer Planning representing Vortal Properties - November 2014.

A summary of the representations made is given below under each Policy reference.

Policy H1: New Housing Development

The submission questions the methodology by which APC has determined its housing numbers for the Plan period. It is claimed that the level of growth proposed is not reflective of the various population projections shown in the plan and that the proposed figure is significantly less than this likely growth should demographic and economic changes have been taken into account. The submission further states that planning consent already granted (and being executed) for three of the four sites in the plan effectively prevents any growth in the balance of the Plan period. The submission goes on to seek clarity on, and recommend changes to the Policy as stated.

Policy H2: Housing Site Selection

The submission seeks clarity and definition on the wording of this policy and in any event considers that the policy duplicates the wording relating to the built up area boundary.

Policy H5: Affordable Homes

The submission reports that the three approved housing sites have not generated local affordable housing. The submission refers to the Policy relating to an affordable housing site and claims to understand that there is no site available in the settlement. The submission offers the view that there is currently no certainty regarding the delivery of affordable housing units and that some flexibility should be accommodated allowing for alternative options for delivering affordable housing such as other development sites,

Response – These comments are noted, but APC is comfortable with the wording of this policy, apart from some changes of terminology suggested by other respondents. APC has in the past delivered housing on a rural exception site and is hopeful of doing so again. Alternatives can be considered in the future should the Council’s efforts not be successful. Additionally site H4D is expected to deliver two affordable housing units as the land is in the ownership of Affinity Sutton, the housing association responsible for the directly adjoining Hunters Mead estate. .

In conclusion, the submission requests that their comments are taken into account in order that the Plan can be found to “meet the Basic Conditions and requirements of the Localism Act”. The submission also formally requests that “an examination of the Plan is carried out and that we are allowed to attend and speak at the examination”

Response – Noted and APC confirms that the plan has been examined in the light of representations received. The findings of that examination are reported in this document. It is not the intention of the Council to meet formally with those making representations, although contact has been made where clarification or explanation has been required. .

22. Ms. Amy Tyler-Jones, South Downs National Park Authority

This summary of representations made by SDNPA includes initial comments made in response to the previous Submission Draft dated 5th August 2014 (See No. 4 above).

General – Welcomes the publication of the Plan and reminds the Parish Council that it will need to produce a Consultation Statement and that it would be helpful if the Plan referred to this document.

Front Cover/Contents – The Plan period should be provided e.g. 2015-2030 and the Plan status should also be shown. E.g. “Plan proposal submitted to etc. with dates”. It would be helpful to have page numbers for the contents and Section 8 could go in the Appendices section.

General – The submission makes a number of suggestions relating to the numbering of various policies and criteria.

Introduction – The Introduction should include a copy of the map showing the Neighbourhood Plan area and the date when the area was agreed. Additionally the 2nd Para. final sentence should also reference the adopted Local Plan and other material considerations. Suggested wording is helpfully supplied.

Maps – Should be given more prominence (say, placed at the front of the Plan) and should be better referenced in the text of the Plan.

Background and General Policies = 2.5 Other Plans and Policy Frameworks – the submission points out the relevance of the “saved policies” of the Local Plan 2004, the SDNPA Partnership Management Plan and the Local Plan “emerging policies”.

Point C – page 3 – Advice on protocol relating to approval of the plan

Paragraph 2.2 – Suggestion to link objectives of the Plan to the Partnership Management Plan and SDNP special qualities.

Paragraph, 2.4 – Should also refer to the emerging South Downs National Park Local Plan

Policy C1 – Policy could be amended to read that development will “only” be permitted in the countryside if it meets the three criteria. It is considered that the policy otherwise is unduly permissive. It may be useful to provide further clarification on what “development” actually is.

Paragraph 3.2 – This paragraph should also state that the Plan needs to take account of the adopted Partnership Management Plan. Remove reference to 2014 – the SDNP Local Plan is due to be adopted in 2017.

Policy C2 – This policy should also refer to the Partnership Management Plan as a material consideration.

Paragraph 3.3 – Seeking clarification as to what is meant by “the area of the parish”

Policy C3 – A map showing the areas to be protected as Local Gaps would be helpful and aid effective decision making, and to provide extra clarification, Policy could be amended to read that development will only be permitted if it meets the three criteria. Policy is otherwise is unduly permissive.

Policy C4 – Points out that this policy will not be material to the consideration of planning applications and suggests moving 2nd Paragraph to supporting text as not part of the policy.

Paragraph 4.2 – Criterion vii should refer to The National Park boundary and setting

Policy H1 – Seeks clarification of the composition of the stated 18 homes and suggests “allocating sufficient sites to meet housing requirement rather than setting criteria based policies to guide site selection”.

Policy H1 – Consider using numbered criteria for this policy i.e. Sites should.....

Policy H2 – Criteria should be numbered for clarity

Policy H3 and Paragraph 4.4 - Suggests revise wording to “Rural Exception Sites” in line with NPPF terminology.

Policy H3 – Points out that this policy will not be material to the consideration of planning application and suggests re-categorising policy as an aim. Additionally, the submission states that the “supporting text suggests the sites identified in the neighbourhood plan will not provide any affordable housing contribution” and that this “contradicts Policy H5. Accordingly the supporting text should be reworded.

Policy H5 – Suggests revised and additional wording to add clarity and definition, specifically defining the term “local people” defining the eligibility criteria for those “local people”, and considering requiring the homes to be affordable in perpetuity.

Policy E3 – Points out that this policy will not be material to the consideration of planning applications.

Policy E3 – Suggest numbering the criteria in this policy to aid effective decision-making

Paragraph 5.3 – Seeks clarification of terminology

Section 7 – Suggests that the aims in this section could be linked to the Community Infrastructure Levy (CIL) and the Infrastructure Delivery Plan (IDP)

Response – All agreed, with one minor exception which we believe arises from a misunderstanding.

23. Mr. Stephen Hinsley of Tetlow King Planning representing Mayfield Market Towns Ltd - 24/11/14.

A summary of the submission is given below under each Policy/Aim reference:

Policy H1 - New Housing Development.

The submission describes the main drivers of the Plan Housing number of 18 dwellings, namely the “constraints of the area” the Albourne Parish Council Housing Survey and the MSDC Common Housing Register. It also sets out that the reference made to “the overall 10,600 housing target” has been superseded by the November 2014 - MSDC Consultation Draft District Plan which “does not contain a housing number”. The submission goes on to state that “the figure identified in the Neighbourhood Plan.....ranging from 12 – 36”, may change once work being undertaken by MSDC, with regard to need and capacity, is completed

The submission goes on to express the view that an objective assessment of the housing needs is much higher than that suggested in MSDC's previous Submission Plan, and that a new District Plan when adopted may mean that the Neighbourhood Plan is not in conformity if the objectively assessed need is higher than identified at present.

Aim T1 – Transport

The submission describes the aim and also the Mayfields Markets Towns proposals for transport mitigation within the Plan area. The submission goes on to state that MMT would be happy to discuss these proposals with Albourne Parish Council, "particularly to identify accommodating the improvements sought by this policy, for road users and pedestrians".

Policy C3 – Local Gaps and Preventing Coalescence

The submission states that the Mayfields Market Town master plan will not result in the coalescence of Local Gaps as identified by the Neighbourhood Plan and further states that "no development other than transport works is proposed by MMT in Albourne.

Response – these comments are reported upon and addressed in the following section – Consideration of main issues.

24. Mr. Chris Owen – West Sussex County Council - 24/11/14.

"There are no further comments that we would wish to make" to the comments made in response to the June Consultation draft.

7. CONSIDERATION OF MAIN ISSUES – 15(2) (d).

Paragraph 15(2) (d) requires the Consultation Statement to describe how the issues and concerns raised as part of the Regulation 14 consultation have been considered and, where relevant, addressed in the proposed NP. This is detailed below.

In order to accurately assess and reflect on the consultation comments received whilst also being able to compare and contrast conflicting viewpoints, a summary of the responses to each of the NP policies has been prepared. There is then commentary about how these concerns have been considered and where relevant, changes made to the applicable policy and supporting text.

It is of note that as a result of the consultation process a number of policies have been reworded, others have been rationalised to create new policies. This has not created new policy areas but has been undertaken for soundness.

A number of policies have also been amended to become Parish "aims". This is principally where policies were not considered to directly relate to development and land use planning and were aspirational aims. The requirements of NPPF paragraph 17, which seeks development plans to be “*a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*”, has been considered. It was felt reasonable to more clearly differentiate between policies and aims. Where this has occurred, the reasoning is noted.

Policy C1 (now ALC1)

The policy was commented on only by Consultee (22) who felt the policy was unduly permissive given that the wording was not clear that development would only be permitted if it met all the require criteria. It is agreed that the suggested revision accurately reflects the nature and intention of the policy and accordingly is agreed. The policy now reads:

“Development, including formal sports and recreation areas, will be permitted in the countryside, defined as the areas outside the built-up area boundary shown on the policy map where:

It is necessary for the purposes of agriculture, or some other use which has to be located in the countryside:

It maintains, or where possible enhances, the quality of the rural and landscape character of the Parish Area:

It is supported by a specific policy reference elsewhere in this Plan.

Policy C2 (ALC2)

The policy was commented on only by Consultee (22) who suggested that the Neighbourhood Plan Map should more clearly show that part of the Plan area that falls within the South Downs National Park. Additionally it was requested that the Policy also clearly state that the SDNP Partnership Management Plan will be a material consideration for development in the relevant area. Upon review, both amendments were agreed and have been made. The policy now reads:

“Any development that lies within the South Downs National Park shall ensure that the two purposes of National Park designations are achieved. The purposes set out in the Environment Act 1995 are to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and promote the opportunities for the understanding and enjoyment of the National Park’s special qualities by the public.*
- In pursuing these purposes there is a duty on the National Park Authority and other public bodies to seek to foster the economic and social wellbeing of local communities within the National Park.*
- Development in the Parish that contributes to the setting of the South Downs National Park will only be permitted where it enhances and does not detract from the National Park’s visual qualities and essential characteristics”.*
- The policies of the SDNP Partnership Management Plan will be a material consideration for such development. The Neighbourhood Area Plan shows the area of National Park that lies within the Neighbourhood Plan area.*

Policy C3 (ALC3)

This policy was commented on only by Consultees 22 and 23. The former suggesting that the policy as worded was unduly permissive, with the latter “developer representative” stating that their plans “will not result on the coalescence of the local gaps identified in the NP”.

As a result of these comments, all the gaps were reviewed and it was noted that Hurstpierpoint Parish Council had added a Hurstpierpoint/Albourne Local Gap to their proposed policy. The gaps were deemed to comply with a number of NP objectives and the overarching Parish Vision to retain a village feel. Policy C3 is in general conformity with the MSLP policy C2 and also with draft MSDP policy DC9. The NPPF is also clear that local character and distinctiveness are key planning issues. It was also deemed the most sustainable option in terms of meeting a number of key objectives. The policy does not prevent development around villages, providing that there is no unacceptable loss of gaps and settlement identity. Local character and distinctiveness are key policy aims.

Given the sustainability benefits of the policy, it is to be retained. The policy wording has also been amended in response to feedback

Policy C4 (ALC4)

The policy was commented on by Consultees (12), (20 – spelling error only) and (22). Consultees (12) and (22) suggested rewording to ensure that the policy reflected land use policy.

The policy wording has been amended to reflect the above and now reads:

“Development will only be supported where it enhances and does not detract from the Conservation area and respects and is sympathetic to the character and setting of this area”

AIM

The following Aim has been added to the Plan since the draft consultation stage following the commencement of the South Downs National Park initiative relative to this subject. The Aim reads:

“This Plan will support the implementation of policies by the SDNP authority aimed at reducing light pollution and its overall landscape impact. These policies will seek to:

- Eliminate any upward lighting that causes harmful sky glow*
- Reduce light trespass to an acceptable level*
- Reduce the impact of glare and direct visibility*

Housing Section

There have been a number of changes to the housing section, with re-wording of policies. There has also been a change to the proposed number of dwellings to be delivered during the Plan period.

The projected number of dwellings in the Parish has been increased from 18 in the consultation draft, to 34 in the submission version. This reflects the change in the Plan period (now 2014 to 2031) and the inclusion of projected windfall dwellings over the balance of the Plan period.

A number of policies have also been reworked. This has not created new policy areas, but helped the narrative and policy flow and presentation of the NP. Some additional text has been added to Paragraph 4.1. This provides further context on housing numbers and issues.

General Comments

Policy H1 (Now reclassified as AIM)

Comments relative to Policy H1 were received from Consultees (12), (20), (21), (22) and (23).

Consultee 12 stated that as written the Policy was more of an “intention” than a Policy and suggested revised wording to add clarity.

Consultee 20 questions the housing numbers, pointing out that of the 18 dwellings over the plan period, to 2031, 13 of the 15 dwellings listed in policy H4, already have consent and are/have been constructed, and that therefore the plan is only allocating 2 dwellings. The consultee further suggests that other sites should be seriously investigated and goes on to suggest a range of “brownfield” sites quoting support from Plan policy H2.

Consultee 21 questions the methodology by which APC has determined its housing numbers for the Plan period. It is claimed that the level of growth proposed is not reflective of the various population projections shown in the plan and that the proposed figure is significantly less than this likely growth should demographic and economic changes have been taken into account. The submission further states that planning consent already granted (and being executed) for three of the four sites in the plan effectively prevents any growth in the balance of the Plan period. The submission goes on to seek clarity on, and recommend changes to the Policy as stated.

Consultee 22 in their initial response seeks clarification of the composition of the stated 18 homes and suggests allocating sufficient sites to meet housing requirement rather than setting criteria based policies to guide site selection”. Their submission in response to the second consultation process limits their comment to using numbered criteria for this policy.

Consultee 23 sets out that some of the MSDC background housing numbers data is no longer relevant and that new data may require the housing figures in the APNP to change. The submission goes on to express the view that an objective assessment of the housing needs is much higher than that suggested in MSDC’s previous Submission Plan.

APC response to consultees 22/23 - APC recognises that in terms of specified sites, development in the Consultation Plan WAS “front-ended”. However, against a background of the NPPF presumptions and MSDC’s lack of a five year housing land supply, ANY identification of specific sites by the Parish Council (with tacit Parish Council approval) was always very likely to lead to early delivery. A total expected housing “delivered” number for the entire Plan period is shown in the Submission Plan. This number includes dwellings constructed in the early stages of the Plan period, projections for future site specific dwellings and an expected number of “windfall” dwellings during the balance of the Plan period.

APC considers that its methodology for both the range and the final number is sound, given its use of various recognised and widely-used social, demographic and economic indicators overlaid with specific need information from the Parish Housing Survey and the MSDC Common Housing register.

The submission version of the plan will reflect this, but will also include additional housing numbers arising from likely windfall site. APC accepts that some of the wording in Policy H1 is reflected in countryside protection and other policies elsewhere in the Plan. The wording of Policy H1 will be amended to reflect this and other representations regarding this wording and the policy will be reclassified as an AIM.

The overall housing number has changed following the Regulation 14 consultation as a result of the completion of housing development on the three sites identified in the Draft Plan. This number is in line with the top end of the economic growth projections of the Parish originally used to provide a template for housing numbers.

Policy H2 (ALH1):

This policy was commented on by Consultees (12), (21) and (22). Consultee (12) suggests revised wording to reflect the intention of the policy suggesting that as currently worded it was more of an intention than a workable policy. Consultee 21 sought clarity and definition of the wording of this policy and considers that the policy duplicates the wording relating to the built-up area boundary. Consultee (22) suggests the criteria should be numbered.

After review, the policy has been revised in line with the Consultation input. The policy now reads:

“Development will generally be supported within or immediately adjoining the Built-up Area boundary provided that:

- 1. The development is appropriate to a village setting in terms of scale, height and massing.*
- 2. The development makes an appropriate use of a brown-field site, or*
- 3. The development is infill and surrounded by existing development”*

Policy H3 (Now AIM)

The policy was commented on only by Consultees (12) and (22), who both suggest revised terminology and the recategorisation of the “policy” as an aim.

These suggestions are accepted and the policy has been amended accordingly

Policy H4 (Now ALH2)

The Policy was commented on only by Consultee (12) who suggested revised wording.

This suggested revision is accepted and the policy has been amended according.

Policy H5 -Affordable housing: (Policy deleted)

Responses from Consultees (12), (21) and (22) were received. Consultee (12) offered a source of revised wording for this policy, and Consultee (22) suggests revised and additional wording to add clarity and definition. Consultee (21) points out that the three recently approved housing sites have not generated local affordable housing; that they understand that there is no site available in the settlement, and that given there is currently no certainty regarding the delivery of affordable housing units, some flexibility should be accommodated allowing for alternative options for delivering affordable housing such as other development sites.

The comments of Consultee 21 have been reviewed, but APC is comfortable with the wording of this Policy, subject to some changes of terminology suggested by the other Consultees. APC has in the past delivered housing on a rural exception site and is hopeful of doing so again (See relevant AIM). Alternatives can be considered in the future should the Council's efforts not be successful. Additionally, it is hoped that the Policy ALH2 site will deliver two affordable housing units, as the land is in the ownership of Affinity Sutton, the housing association responsible for the directly adjoining Hunters Mead estate. .

NOTE – On 10th July 2015, MSDC issued revised guidance on the subject of policy relating to the affordable housing element of any proposed development. In the light of this guidance, it is clear that APC's intended policy in this area is unsustainable and contrary to national guidelines and MSDC's interpretation of these guidelines. Accordingly no specific policy will be set for this this area and this plan will rely on Mid Sussex District Plan policies.

Economy and Employment Section

Policy E1 (Now ALE1)

The policy was commented on only by Consultee (12) who pointed out a discrepancy in the number of local businesses quoted in the preliminary wording (vs the Sustainability Appraisal) and suggested additional wording to strengthen the policy.

The supporting wording has been amended. The policy has been reviewed in the light of the comments and has been amended in line with the suggestion. Policy E1 now reads;

“Albourne Court, High Cross Farm, Jammeson’s Farm, Softech House and Sovereign House – within the built up areas of these sites, development which maintains and enhances employment in these locations, will be supported, subject to the requirements of any other policies and aims elsewhere in this Plan”.

Policy E2 (AIM)

Policy E2 was erroneously labelled as E3 in the APNP Consultation Draft. This was pointed out by several Consultees. Only Consultee (1) provided any further comments with these being of support together with advice and guidance on how the aim might be achieved. These have been noted. For the avoidance of doubt, Policy E2 is shown below:

“West Sussex County Council and the Rural Broadband Partnership will be encourage to promote superfast broadband coverage with the aim of ensuring that the entire parish is designated as either black or grey area status”

Policy E3 (ALE2)

Policy E3 was erroneously labelled as E4 in the APNP Consultation Draft. Comments received from Consultee (12) suggesting that the wording lacked clarity over the precise geographic area covered and comments from Consultee (23) suggesting that the relevant elements of the Policy be numbered. After review, both suggestions were agreed and Policy ALE2 now reads:

“Small scale, low impact development that is consistent with the Statutory Purposes of the National Park will be supported for facilities connected with tourism. This includes but is not limited to, holiday accommodation including hotel, motel, holiday homes and camp sites. Any new development of conversion for tourism will be required to:

- a. not be in conflict with the characteristics of the National Park and the open countryside of the Neighbourhood Plan area, and
- b. not result in a severe traffic impact either individually or cumulatively, and

- c. provide for an appropriate level of parking for both vehicles and cycling, and
- d. not result in a loss of amenity to neighbouring properties, including for noise
- e. where camping is being proposed, the campsite should provide on-site wash and toilet facilities

This policy applies to the Neighbourhood Plan Area as a whole reflecting not only the boundary but also the proximity and setting of the Neighbourhood Plan area to the South Downs National Park”.

Transport Section

In reviewing the policies in the transport section it was decided that all of them should be regarded as Parish aims. It was clear from the consultation process that highway issues were of key importance to stakeholders. However, whilst acknowledging that these were important aims, they nevertheless were not sufficiently tied to land use planning and development.

Paragraph 17 of the NPPF makes it clear that development plans should provide “*a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.*” Most of the transport policies would not meet this requirement and ~~wh~~ they remain an important priority for the Parish Council, should be labelled as aims.

Policy T1 (Aim)

The policy was commented on only by Consultee (7), who did not consider it to be a policy position, and Consultee (23) who comments that their development initiative (Mayfields Market Town) contains proposals for transport mitigation within the Plan area and that they would be happy to discuss these proposals with APC. APC has now seen plans which show that the B2116 Henfield Road from its newly proposed junction with the A23 will become the main link road into Mayfields Market Town. Given this road runs directly through the Albourne Green part of the village and within 100 yards of the school entrance, it is difficult to envisage any MMT initiative or even mitigation that might contribute positively to the success of Aim T1.

The policy is considered relevant and is retained as an aim.

Policy T2 (Aim)

The policy was only commented on by Consultee (18) who supported the inclusion. It is retained but as an aim.

Policy T3 (Aim)

No comments received. It is retained, but as an aim.

Policy T4 (Aim)

The policy was only commented on by Consultee (18) who supported the inclusion. It is retained, but as an aim.

New Policy T5 (Aim)

During the APNP Consultation period, APC learnt that the expected upgrading of the A23 Trunk road surface through the Parish was not likely to occur in the short or medium term. APC has resolved to take steps to accelerate delivery of this much needed benefit and accordingly an Aim reflecting this has been added to the Plan.

Policy A1 (Aim)

No comments received. Aim wording to remain unchanged

Policy A2 (Aim)

No comments received. Aim wording to remain unchanged.

New Policy A3 (Aim)

Comments relative to Section 7.4 of the Consultation Draft APNP were received from Consultee (8) suggesting that APC should support provision of additional places at Albourne Village School to support the surrounding district. This suggestion is accepted and supported; accordingly an additional Amenity Aim has been added as follows;

- *“The Council (APC) will support and assist efforts by the School to increase capacity and improve facilities for teachers and pupils.*

9. SUMMARY

The above information confirms that the NP consultation process was undertaken in accordance with Neighbourhood Planning (General) Regulations 2012 and specifically Part 5, Paragraph 15 (1) & (2).

This document clearly sets out how and who were consulted as part of the NP consultation process. It summarises all consultee responses received as part of the Regulation 14 consultation. Consultee comments are then clearly assessed against each individual policy contained in the NP.

A thorough assessment of the comments has been made and where necessary policy requirements or wordings have been amended in response to the comments received. Where policies have not been changed as a result of comments, justification for this is given.

Aside from the requirements of Paragraph 15 (1) & (2), the document also clearly shows that stakeholder and public engagement has been the backbone of the NP process. This started with the Parish Survey in 2012 and continued into the NP process. The stakeholder engagement has included local residents, local business, land owners, prospective developers and neighbouring authorities.

This document confirms that the NP has been the subject of robust consultation and comments from interested parties assessed. The NP should now proceed to formal assessment.