

Bramber Neighbourhood Plan 2018 to 2031

Consultation Statement

**Submission Stage (Regulation 16)
January 2020**

Contents

1	INTRODUCTION.....	3
2	SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES.....	5
	Stage I: Taking stock of existing feedback and evidence from the SWAB process	6
	Stage II: Exploring potential sites for development	9
	Stage III: Consulting on potential options for Bramber	10
	Stage IV: Determining the future of the Clays Field site.....	14
	Stage V: Pre-Submission (Regulation 14) Draft Neighbourhood Plan Consultation	15
3	STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATION ASSESSMENT	21
4	CONCLUSION	23
APPENDIX A	Diary of significant engagement events and activities - Nov. 2017 – December – 2018	
APPENDIX B	Bramber Neighbourhood Plan - Implications of the Community Survey findings and work to date	
APPENDIX C	List of statutory consultees and letter sent at Regulation 14	
APPENDIX D	Summary of Regulation 14 representatives and response from Steering Group	
APPENDIX E	Copy of email received from Heathen’s Burial Corner	
APPENDIX F	Horsham District Council SEA Screening Opinion	

1 INTRODUCTION

- 1.1. The policies contained in the Bramber Neighbourhood Development Plan (the 'Neighbourhood Plan', 'the Plan' or 'the BNDP') have been developed as a result of extensive interaction and consultation with the community and businesses within the area. This engagement process has been an integral part of the work since the inception of the Bramber Neighbourhood Plan in 2017 and has included articles in the parish newsletters, surveys, public exhibitions and presentations to community groups.
- 1.2. It should be noted that prior to Bramber developing its own Neighbourhood Plan, in 2014 the parish had originally commenced work on a joint Neighbourhood Plan in partnership with the neighbouring parishes of Steyning, Wiston and Ashurst (collectively, with Bramber, known as SWAB). This was later disbanded, but an extensive programme of engagement activities was undertaken and the information relevant to Bramber parish has been used to inform the Bramber Neighbourhood Plan.
- 1.3. This Consultation Statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

Bramber Neighbourhood Plan Steering Group

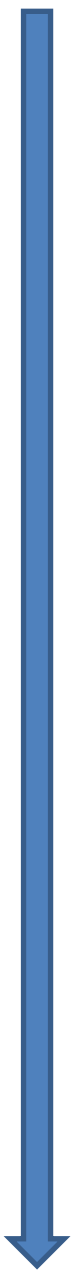
- 1.4. In November 2017, the Parish Council decided that it would like to develop a neighbourhood plan solely for Bramber parish to enable it to have a greater influence over land-use and planning in the area. This would build upon the work previously undertaken by the parish in partnership with its neighbours, when developing the cluster neighbourhood plan. An appeal for volunteers was issued in January 2018 and those putting themselves forward were interviewed by Council representatives, following which a Steering Group was formed. This initially comprised 13 members, seven of who were residents and six parish councillors.
- 1.5. The Steering Group developed Terms of Reference, which set out the purpose of the group and the topics to be explored including:
 - Future housing needs (numbers required, potential sites , style/type)
 - Overall environment and retention of important Green Spaces
 - Future look of tourism and commerce
 - Roads, bridleways and footpaths
 - How the heritage of Bramber should be preserved/developed
- 1.6. It also agreed a Code of Conduct for members of the Steering Group to abide by and, later, a Memorandum of Understanding with neighbouring parishes.
- 1.7. Five Focus Groups, covering different topics, were formed which then included further volunteers who have a variety of skills and a commitment to the community, with the chairman of each

working group reporting directly to the Steering Group. All those involved in the Plan have given up significant amount of their time and energy to work on the neighbourhood plan.

2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

- 2.1. An important part of the Neighbourhood Plan process has been to ensure that all residents and those with an interest in Bramber parish have had an opportunity to input into the work. The Steering Group has spent a great deal of time and energy speaking to as many individuals, local groups and businesses as possible throughout the process. There has been ongoing engagement with the community – to share and disseminate information and to seek input - and also some key consultation activities at strategic points in the process. Throughout the whole process the Steering Group has met frequently and these meetings have been open to the public.
- 2.2. A summary of the significant programme of engagement and consultation activity is illustrated in Figure 2.1 and a comprehensive timeline of activity is contained in Appendix A.

Figure 2.1: Key milestones in the Bramber Neighbourhood Plan process



Date	Milestones	Key activities
2014 to 2017	Bramber initially begins preparing a Neighbourhood Plan with the neighbouring parishes of Steyning, Wiston and Ashurst.	<ul style="list-style-type: none"> A great deal of work was undertaken to progress the joint plan, including extensive engagement with the local community. A very draft Plan was produced before the parishes, in October 2017, took the decision to move forward separately on individual neighbourhood matters.
2017 and 2018	<p>Bramber Parish Council agrees to develop a Neighbourhood Plan for the parish.</p> <p>Evidence relating to the parish is collated.</p> <p>Extensive programme of community engagement, building on the previous work, is undertaken.</p> <p>Policy options developed and feedback sought from the community.</p>	<ul style="list-style-type: none"> Steering Group and Focus groups formed. Parish boundary is formally designated as the Neighbourhood Area. Local Housing Needs Assessment undertaken. Local Call for sites issued and sites assessed using pro forma agreed with HDC and the SDNPA. Ongoing engagement on the focus group themes with local residents, landowners and businesses. Community and business surveys issued.
2019 to 2020	<p>First draft of the Plan is developed for comment.</p> <p>Additional evidence and feedback gathered.</p> <p>Pre-Submission draft prepared and consulted on.</p>	<ul style="list-style-type: none"> Design Codes work undertaken. Pre-Submission draft Neighbourhood Plan is drafted and consulted on at Regulation 14. Comments received are collated and the draft Plan is amended in readiness to formally issue to Horsham District Council. Supporting documents developed to sit alongside the Submission Version of the neighbourhood plan.

Submission Plan (Regulation 16) prepared	<ul style="list-style-type: none"> Plan submitted to Horsham District Council as the lead planning authority for the Neighbourhood Plan.
--	---

- 2.3. The sections below describe, in fuller detail, the engagement and consultation process which took place during the course of the Plan preparation. This is divided into six main stages:

Stage I: Taking stock of existing feedback and evidence from the SWAB process

Stage II: Exploring potential sites for development

Stage III: Consulting on potential options for Bramber

Stage IV: Determining the future of the Clays Field site

Stage V: Preparing the Pre-Submission (Regulation 14) Draft Neighbourhood Plan

Stage VI: Preparing the Submission (Regulation 16) Neighbourhood Plan

Stage I: Taking stock of existing feedback and evidence from the SWAB process

- 2.4. Bramber had originally been developing a joint Neighbourhood Plan with the neighbouring parishes of Steyning, Wiston and Ashurst; collectively this group was called 'SWAB'.

- 2.5. A Steering Group for SWAB was formed in September 2014 comprising representatives from each of the parishes. Following this, six Focus Groups, involving over 70 volunteers, who were all local residents, were established to explore the various Plan themes. An extensive programme of engagement activities was undertaken, which ensured that the community had the opportunity to input into the emerging work at every stage. This included:

- Hundreds of hours of volunteer time dedicated to giving local residents increased control over future local land use, including 25 meetings of the Steering Group and numerous focus group meetings (e.g. Housing – 16 meetings).
- Public survey issued in January 2015, and 844 responses received. Responses provided a basis for a broad understanding the range of opinions and suggestions at the outset of the project.
- Vision statement produced January 2015.
- Youth survey issued by Steyning Grammar School pupils in July 2015. Of nearly 300 responses, 96 were received from young people in the SWAB parishes. This data was analysed and forwarded to the SWAB Team.
- Call for sites issued in spring 2015 and Local Green Spaces survey.
- A Stage One report produced in October 2015.
- An informal public consultation exercise held over two weekends in January 2016 on the proposed sites and local open spaces. Over 700 residents attended.
- From Spring 2016 the key focus of the work was primarily to prepare the content and policies for the 'Pre-submission Document' (the draft SWAB NP).

- 2.6. In October 2017, the parish councils took the decision to move forward separately on individual neighbourhood matters. Amongst other local matters, this was as a result of the changing requirements and evolving legislation relating to neighbourhood planning, which resulted in the

need for each individual parish to review and re-evaluate its role within the parish cluster. A closing statement was prepared and publicised¹.

- 2.7. After careful consideration, Bramber took the decision to continue with a Neighbourhood Plan that would cover just the area of Bramber Parish. The neighbourhood area – sharing a boundary with the parish – was designated by both Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA), with HDC named as the lead authority in the process.
- 2.8. By this point, a very draft version of the SWAB plan had been prepared, but there was much work to do to separate out the relevant information relating to Bramber.
- 2.9. A Steering Group comprising local residents and councillors was established, and Focus groups were formed to explore different topics. These were:
 - Community facilities
 - Environment and countryside
 - Housing and development
 - Tourism, commerce and heritage
 - Transport, including roads and public rights of way
- 2.10. In order to capitalise on the valuable feedback that had been gained during the SWAB process, an initial Focus Group familiarisation exercise was undertaken whereby Bramber-related feedback from the local surveys, evidence collated and the draft joint plan were extracted and considered. A planning consultant was appointed at this stage to assist in this activity and in the ongoing preparation of the Plan. The consultant prepared a schedule of Implications of the SWAB Community Survey findings and work to date, along with a detail on potential policies that could be considered for the Bramber Neighbourhood Plan, including where additional evidence might be required. This document is included in Appendix B.
- 2.11. The exercise revealed a number of evidence gaps that the Steering Group felt should address. This led to the group commissioning AECOM to prepare a Local Housing Needs Assessment for Bramber. SWAB had previously commissioned a Housing Needs Survey for the four parishes, but advice from Horsham District Council stated that this may not be robust in terms of taking into account future trends in population growth, inward and outward migration and so forth; rather it provided a snapshot in time. The Bramber Local Housing Needs Assessment² was published in April 2018.
- 2.12. During this time, the Steering Group organised a series of public events and activities to relaunch the Plan process under the Bramber banner, share progress to date and set out the next steps. Each of the Focus Groups developed an update report that was shared on the Bramber Parish Council website and made available at events. In addition, an article was placed in the Bramber newsletter, which is distributed to all households locally.

¹ Available at: <http://steyingpc.gov.uk/wp-content/uploads/2011/08/SWAB-Neighbourhood-Plan-Closing-statement-Oct-17.pdf>

² https://85412a7e-8988-4286-967f-b281f2a0bf2c.filesusr.com/ugd/964dee_658f23c36beb4fdc9b937ce061d6c7a9.pdf



The Steering Group had a stall at the annual Steyning Showcase (photo: Steyning Parish Council)

- 2.13. The work to consolidate previous findings and the gathering of new information enabled the Steering Group to develop a draft vision and objectives for Bramber parish. The draft vision for Bramber up to 2031 was as follows:

The rural parish of Bramber will have retained its own recognisable character, distinct from nearby settlements, with the quality of the landscape spaces within and surrounding it continuing to define its identity.

Bramber's role as a small village and place to visit will have evolved to continue to meet the needs of local residents, but without compromising the special character that makes The Street so unique, including the built heritage, the Conservation Area and listed buildings. Community facilities (e.g. Bramber Castle, Bramber Brooks) will remain a focal point for the community and they will, where possible, be improved to become more attractive to both residents and visitors alike; the parish council will have expanded its role in the ownership and management of facilities, along with their open spaces and natural assets.

The neighbourhood plan will have further enabled strong, positive and supportive working relationships that exist with neighbouring parishes, local schools, the Steyning Health Trust and local businesses. These will all continue to contribute to the vitality of the area, making a greater range of facilities available to the parish, and contributing to a shared sense of community pride in Bramber.

Bramber will continue to support local employment and businesses. Its sustainable tourism offer will have grown, making a positive contribution to the local economy and employment. This will be supported by a plan developed in partnership with the South Downs National Park to protect the shared rural setting of Bramber and make improvements to connectivity, green infrastructure and heritage assets.

Accessibility to and connectivity between facilities, amenities, green space and recreational areas, both within Bramber and with neighbouring settlements, will have been improved. This will include maintaining and expanding, where necessary, the existing network of footpaths, bridleways, and cycle routes, thus encouraging more people to find more sustainable ways to access local facilities rather than using their cars, helping to cut down on congestion and pollution.

There will have been a modest growth in housing numbers across the parish through the provision of new homes, designed to meet local needs including elderly downsizers and those starting out on the housing ladder, including families. This will help to provide a balance of dwelling types to serve the community over the long term, enabling those connected with

Bramber to live here if they wish while also encouraging new residents. New homes will have been provided in areas that do not detract from the character and setting of the parish and will, where possible, encourage sustainable living.

2.14. The proposed objectives of the Bramber Neighbourhood Plan were as follows:

Objective 1: Protect the rural character of the parish, the qualities of its landscape setting and its biodiversity, managing the impacts of any future growth.

Objective 2: Carefully manage the siting of development to protect the individual identity and setting of Bramber.

Objective 3: Ensure that development is sustainable and sympathetic to the scale, landscape setting, topography and architectural and historic character of where it is sited in the parish.

Objective 4: Plan for some additional housing to meet predominantly local housing needs, bearing in mind changing demographics, to provide a more balanced housing mix, in particular for local affordability and elderly downsizers.

Objective 5: Address local transport issues, including car and parking issues, but predominantly promoting sustainable transport options by improving connectivity to facilities within and beyond the parish by integrating and, where possible, extending the existing network of paths to provide safe pedestrian, cycle and horse riding routes.

Objective 6: Promote opportunities for sustainable tourism, particularly where it enables increased public accessibility to and enjoyment of the national park for recreation and leisure.

Objective 7: Safeguard local green spaces that are valued by the community, improve their biodiversity and integrate them with the footpath and bridleway network.

Objective 8: Support existing businesses operating in the parish and provide opportunities for new ones where this can be achieved sustainably.

Objective 9: Retain and, where possible, expand the range of facilities and amenities available for local residents.

Stage II: Exploring potential sites for development

- 2.15. The Bramber Local Housing Needs Assessment revealed a potential need for housing locally in the parish over the lifetime of the Plan. Given the large number of constraints in the parish – including the protected National Park land, the floodplain, the landscape and local heritage - an important consideration for the Steering Group was to determine whether sites might be available within the parish that would be suitable to allocate for housing.
- 2.16. Between May and July 2018, a Local Call for Sites was launched, which invited local landowners, developers and others to submit any land that they wished to be assessed for the purposes of the neighbourhood plan. The Call for Sites was advertised online, in the local press, and on banners and posters. Local estate agents were approached to disseminate information to their clients. A

full-page article was placed in the Your Steyning magazine, which was distributed to every household in both Bramber and Steyning.



Banner advertising the Local Call for Sites

- 2.17. The Steering Group worked with the planning teams at Horsham District Council and the South Downs National Park Authority to develop a robust framework against which the emerging sites could be assessed, based upon the criteria used by the two local planning authorities in their own assessments, and adding additional local factors that were felt to be important.
- 2.18. In total, two sites were submitted via the Local Call for Sites – one within the South Downs National Park and one within Horsham District. Both sites had previously been submitted to the planning authorities during their own Call for Sites. Each site was assessed against the criteria, with a short description and summary using a red/amber/green rating where appropriate. Site owners were invited to attend the public Steering Group meetings to share their ideas for the sites and to enable the group to ask questions.
- 2.19. The site assessment itself was undertaken by a sub-group of the Steering Group, who found both sites to be unsuitable for development. The site assessments can be found in the Bramber Housing Report including Site Assessments.
- 2.20. It was vital to engage the community on the site assessment process and gain feedback on the findings. This was done initially by a newsletter update issued to all residents, including those in Steyning bordering one of the sites put forward for assessment. The update included the draft vision and objectives, information about the sites process and progress on the various topic areas. It publicised a public event to be held in November 2018, which would provide an opportunity to meet the Steering Group and learn more about the proposed content for the Plan, including the sites work.

Stage III: Consulting on potential options for Bramber

- 2.21. The November 2018 public event in the village centre set out the draft vision, objectives and draft policy options for the emerging Neighbourhood Plan. This was heavily advertised across Bramber and to those living in nearby Steyning. In preparation for this, two surveys were developed, one aimed at individuals living in the community and the other aimed at local businesses. The surveys were available to complete online and paper copies were available at the public event to be completed then or returned at a later date.



- 2.22. The event comprised a scrolling presentation giving general information about the neighbourhood planning process, with members of the Steering Group available to answer questions. Each Focus Group presented the material and proposed options for their particular topic area of the plan on display boards, again with members on hand to respond to queries and record any verbal feedback. The Housing Focus Group presented the findings of the Local Housing Needs Assessment and detail of the two sites that had been put forward, alongside the site assessment findings undertaken by the group. A copy of the display boards is available to view on the Bramber Neighbourhood Plan website³.



Photos from the Public Event, November 2018

- 2.23. Attendees were asked to sign in to the event and place a dot on a map, which proved helpful in understanding the breadth of interest across the area. The event was extremely well attended

³ <https://www.bramber.org.uk/neighbourhood-plan>

with over 200 residents across the day, split roughly 50:50 between those living in Bramber and Steyning. This split was not unexpected as one of the two sites being consulted on directly borders Steyning.

- 2.24. The community survey was also very successful with over 80 responses received from residents, with many completed on behalf of a couple or family. The full findings of the Survey can be found on the Bramber website⁴. These responses, along with comments received and recorded verbally on the day, were used by the Focus Groups to enable them to continue drafting the policies. In summary, the main findings from this engagement were:

Housing and development:

- Strong agreement with the proposals relating to Housing including character and design and the need to promote sustainable design.
- General agreement that a Housing Need exists locally, but many concerns were raised about the two sites:
 - Clays Field – The majority of people did not wish to see the field developed for housing, even if that meant the rest of the field being made available over the longer term for the general public to use. The field was cited by many as being an important green space that had always existed to separate the villages of Bramber and Steyning. Many residents felt strongly that the previous owner of the site had wished for the field to remain as it was, without development and for local residents to enjoy. There was talk of a covenant to this effect although none has been found. Comments were received stating that the field should be retained as a protected green space because of its significance locally.

Those who were open to housing on the site largely felt that the proposal being put forward at this time (development of 25% of the entire area, with an approximate number cited at circa 35 to 40 dwellings) to be too encroaching and impactful on Castle Lane, and the environment. The potential detrimental impact on the 'nature of Castle Lane' as a rural lane was mentioned. Only a small handful of people said that they would accept housing, with most suggesting a very small development (up to 15 dwellings) on the site would be most appropriate in that case.

Notably, those residents from Steyning attending the event were keen that they be fully involved in the Bramber Plan where appropriate, given the importance of Clays Field to them.

It should be noted that some months after the public meeting, in June 2019, the landowner provided additional detail on the proposal. The email contained: an assessment of typical development layouts in Bramber/Steyning – indicating that there are a variety of typologies ; linear, curved, cul-de-sacs and blocks/ communal sites; and development proposals (including 3 layouts as follows: Layout 1 (as previously discussed) comprising housing with 40 units; Layout 2, which reduced the spread of development but retained 40 units in a mainly detached/semi-detached form with flats to the south-east and a larger area of retained parkland being achieved; and Layout 3, a potential 55+ scheme (40 units) with reduced parking and an even great level of open parkland retained.

⁴ <https://www.bramber.org.uk/>

In addition, a proposed highway layout along Clays Hill was provided showing provision of a footway and a narrowing to which would aid traffic calming.

The Housing Group and wider Steering Group would discuss these proposals in detail and in light of the comments stemming from the public event.

- Land south of Kingsmead Close – The majority of comments received about the site raised concerns about development within the National Park, which they felt should be safeguarded. The site had previously been refused planning permission and residents were very aware of this. There was a suggestion that developing this site might open up additional sites within the National Park to development, which would be detrimental to the Park. The space was felt to be a valued area of woodland, which was important for both wildlife and as part of the setting of the National Park.

Environment and Countryside:

- There was strong support for all of the proposed Environment Policy ideas.
- In terms of Local Green Spaces, 72% of respondents agreed that Clays Field should be designated, with many writing additional comments in support of this. There was also strong support for Maudlin Field, however this is located within the South Downs National Park so already is afforded a level of protection. A number of additional potential Local Green Spaces were mentioned in the feedback including the land at Kingsmead, Bramber Brooks and St Marys Gardens. All had previously been assessed as not suitable as part of the SWAB process and again by the Focus Group for the Bramber plan.

Transport and Movement

- There was strong support for most of the proposed policy ideas.
- The proposal for a Pegasus controlled crossing at the A283 received 64% support. The proposal to develop a more formalised small car parking areas at Bostal Road received support from 74% of respondents while the proposal for a scheme near to the A283 roundabout was less popular with just under half of respondents in support.

Community facilities

- There was strong support for all proposals in this area, including the need to consider expanding facilities for teenagers and young people in the parish.

Tourism, commerce and heritage

- The general consensus was that local heritage assets are sufficiently protected within the parish. The only exception was the mention of Clays Field, with particular regard to its archaeological heritage, having been the site of a major late Bronze Age hoard. The Steering Group decided to commission AECOM to prepare guidelines for the design/character of development in the parish, to be included in the Neighbourhood Plan. This would identify the different character areas of the parish, the features that distinguish them and set out how any future development should take them into account.
- There were many ideas about improving the visitor appeal of the parish, but many of these were considered actions, as opposed to being suitable for land-use and spatial policies.

- The separate survey targeted at local businesses reaped only a modest number of responses, despite much effort from the Steering Group to engage them, including hand delivering the information. It was felt that many business owners might have simply filled in the community survey instead. The majority of the feedback on support for local business related to non-planning matters, including lowering business rates, opening particular shops in the village and offering free parking.

Stage IV: Determining the future of the Clays Field and Land behind Kingsmead Close sites

- 2.25. Following on from the event, the Focus Groups began to refine the policies for the draft Neighbourhood Plan. In particular, there was much discussion about whether or not the Neighbourhood Plan should seek to allocate housing, given the identified housing need, but in light of the strength of commentary received at the public event and the findings of the site assessments. During this time, meetings and dialogue took place with the following:

Local Planning Authorities:

- 2.26. Discussions with the South Downs National Park about the potential constraints of developing the Kingsmead site (located in the National Park) led the group to determine that the site assessment was robust and that the site should not be allocated in the Neighbourhood Plan.
- 2.27. The Senior Planning Officer from Horsham District Council (HDC) attended a meeting of the Steering Group following the public event to discuss the findings and to present an update on the emerging Local Plan Review. In particular, HDC was encouraging local neighbourhood planning groups to decide if they wished to consider allocations within their neighbourhood plans or leave this process to be dealt with as part of the Local Plan Review. This was discussed in detail, with the Steering Group ultimately deciding to explore site allocations in the Neighbourhood Plan.
- 2.28. On the subject of Clays Field (located within Horsham District), the advice from HDC was that this site (or indeed any site) should only be allocated if the evidence demonstrates that it is available, suitable and developable. This is regardless of whether alternative sites are available. On the potential to designate it as a Local Green Space, the advice underlined the need for the criteria of the National Planning Policy Framework to be met.

Local landowners and site promoters:

- 2.29. Representatives for the two sites attended many of the Steering Group and Housing Group meetings, where the Steering Group discussed in detail the potential to allocate housing. Having come to a conclusion on the Kingsmead site, the discussion focussed on Clays Field. The initial site assessment had resulted in the site being found unsuitable for development. This was based on the premise of 25% of the field being developed, with in the region of 35 to 40 dwellings, with the remainder made available for public use and potentially gifted to the community.
- 2.30. As mentioned previously in this report, in June 2019, an indication of potential designs was proposed by the site promoter, including either smaller dwellings or a residential home development. In light of this, and the proven need for housing locally, the Steering Group felt that the site should be again reviewed and it debated the potential pros and cons of the various

options for Clays Field - the notes from this can be found on the Bramber website⁵. The site promoter attended this discussions.

- 2.31. The discussion led to the Steering Group gathering additional evidence about the site including: whether the covenant pertaining to public access mentioned by many residents existed; (the site promoter was unaware of any such covenant), additional information on the archaeological and historical importance of the site; additional information on the landscape and setting of the site and its biodiversity.
- 2.32. The findings of this additional research, which is set out in the Bramber Housing Report incorporating Site Assessments, enabled the Steering Group to take two decisions: first, to continue to support the findings of the initial site assessment (that is the site is unsuitable for development) and second, to allocate Clays Field as a Local Green Space.
- 2.33. The Pre-Submission (Regulation 14) Draft Neighbourhood Plan was completed in August 2019 and was available for comment in the 6-week period from 21st September to 2nd November.

Stage V: Pre-Submission (Regulation 14) Draft Neighbourhood Plan Consultation

- 2.34. The Steering Group prepared its Regulation 14 draft of the Neighbourhood Plan and supporting documentation and evidence including a Sustainability Appraisal. A newsletter was issued to all residents, including those in the parts of Steyning bordering Clays Field⁶, to set out how the consultation would function and to promote two public drop-in events. A summary leaflet, explaining the Plan and encouraging people to read it fully, was prepared.

⁵ https://85412a7e-8988-4286-967f-b281f2a0bf2c.filesusr.com/ugd/964dee_751d518c18694507a96349465fb4ab7d.pdf

⁶ noting that any referendum, unless stated otherwise, would be for Bramber residents only.



Flier delivered to all households

- 2.35. The consultation was held over a six-week period from 21st September 2019 to 2nd November 2019. All documents were made available online and printed copies were posted at various locations in Bramber and Steyning (The Old Tollgate Hotel, The Castle Hotel and The Steyning Centre). Banners were placed at key locations in the village promoting the consultation and advertising the two public events that were held on Saturday 28th September (10am to 1pm) and Wednesday 2nd October (7pm to 9:30pm) at the Beeding and Bramber Village Hall. A feedback survey was created to assist people in feeding back their comments on the individual Plan policies, as well as any general comments.
- 2.36. Despite being widely advertised, the events were not particularly well-attended and this was put down to the fact that residents felt their views had been fully considered in respect of how the Clays Field site was being progressed in the Plan; this had been one of the biggest issues amongst local people. 42 feedback surveys were returned in total.
- 2.37. In addition to responses from the general public, professional responses on behalf of the Clays Field land owner were received from DMH Stallard. A response on behalf of the owner of the Land at Kingsmead was also received. Letters were also written to Statutory Authorities. A list of the consultees and the letter sent to them is contained in Appendix C. Responses were received from the following statutory consultees:

- Horsham District Council

- Environment Agency
- Historic England
- Natural England
- South Downs National Park Authority
- Southern Water
- West Sussex County Council Services

- 2.38. Comments received to Pre-Submission Consultations were recorded and made available for Steering Group members to read. The Comments were then assessed by Steering Group members and grouped by topic / policy. A summary of the comments and responses from the Steering Group are set out in Appendix D. The following paragraphs provide a summary, by topic area, of the comments received during this process.
- 2.39. **General comments:** The Steering Group was praised for their efforts in getting the Plan to this stage and the amount of work that had gone into the process. There was a general comment about the need to include more emphasis on climate change, particularly in light of the current government and global stance on this. Whilst sustainability issues are set out in Policy on Sustainable Design, the Steering Group agreed that it would be helpful to strengthen references to this in the vision and objectives. Linked to this was a call for greater emphasis to be placed on the aims of the South Downs National Park, and this was reflected in the amendments to the document, including marking the boundary of the National Park on the maps.
- 2.40. **Vision and objectives:** These were largely supported by most respondents. More explicit reference to the South Downs National Park objectives, the conservation of historic assets and the need to mitigate climate change have been added.
- 2.41. **Spatial Strategy:** Comments were received about the need to retain the strategic gap between Bramber and Steyning, to avoid coalescence. This was felt to be sufficiently set out in Policy B1, which retains the existing settlement boundaries as set out in the Horsham District Planning Framework.
- 2.42. **Housing:** Two sites had been submitted and assessed using a robust set of criteria developed in consultation with Horsham District Council and the South Downs National Park Authority. Both sites were assessed as not suitable for development, and the reasons are set out fully in the Housing Report.
- 2.43. Responses from both site owners were received at Regulation 14.
- 2.44. **Clays Field** - A concern was raised by the respondent that the Neighbourhood Plan was not meeting the Basic Conditions because it was not promoting sustainable development, by virtue of the fact that this site was not being allocated for housing, in spite of the evidenced local housing need. As described in this Consultation Statement, and in the separate Housing Report, the Steering Group commissioned an independent Local Housing Needs Survey for the parish, which established a modest housing need of circa 5 dwellings per annum over the course of the Plan.
- 2.45. The site promoter for Clays Field initially put forward 25% of the entire field forward for the development of approximately 35 to 40 dwellings. Further detail – proposing three alternative layouts – was later submitted to the group. This proposal was later refined to suggest that approximately 20% of the field for a similar number of dwellings would be possible.

- 2.46. The Housing Group and wider steering group carefully considered the comments received, which not only question the sustainability of the plan but also question the reasons for declaring the site unsuitable for development. The site promoter commissioned their own heritage and landscape report, for example. The Steering Group determined that reduction in the developable area of the site was not felt to outweigh the constraints identified. The points raised in the reports commissioned by the landowner were not felt to change the assessment of the site, the points being further ratified by a submission from Horsham District Council at Regulation 14, which included submissions from the Senior Heritage Officer and Senior Conservation Officers. This evidence found that *“an allocation would result in harm to the landscape character and visual amenity of the area including views from the South Downs NP. It would also result in harm to the landscape setting of Steyning, Bramber Castle and National Park as well as resulting in coalescence between Steyning and Bramber when appreciated from the elevated path on the SDNP” and that “this part of Clays Field will lead to harm to the special interest of the castle in its setting”*.
- 2.47. Following the completion of the six week formal consultation period, the landowner attended a meeting of the Steering Group to propose that the site proposal could be changed to reduce the number of dwellings. Whilst no official proposal was tabled, an email outlining the new proposal was emailed to the group on 13 December 2019 reducing the proposed number of dwellings from 40 to 12. No detail on the type of housing proposed was provided, although it should be noted that 12 dwellings falls short of the thresholds for affordable housing where Policy 16 of the HDPF required 35% affordable housing on sites of 15 houses or more. The Steering Group discussed the proposal but felt that even a slimmed down development would not negate the evidence prepared for the neighbourhood plan, and would be detrimental to the historic and landscape value of the site.
- 2.48. **Land south of Kingsmead Close** – The landowner of the site responded to the online survey to suggest that the site should be included as it would contribute to the identified housing need and any concerns about impact of development could be satisfactorily addressed through design. The Neighbourhood Plan Steering group assessed the site as part of the Neighbourhood Plan process. This found the site unsuitable for development and the fuller details are set out in the Housing Report. The responses received from the South Downs National Park at Regulation 14 reinforce this finding.
- 2.49. The Steering Group considers that it has taken proactive steps in seeking to identify suitable sites for housing to meet their identified need. However, it should be appreciated that the parish is highly constrained in its supply and only two sites were put forward. Both were assessed objectively and both were found to be unsuitable. That is not to say that alternative sites may arise in the future and the Neighbourhood Plan commits, in its Aim 1, to an early review of the document once the Horsham Local Plan Review is adopted, which may compel additional sites to come forward.
- 2.50. **Design and heritage:** Policies B2 (Character of development) and B3 (Design of development) received some drafting comments, which have been reflected. Policy B4 (Energy efficiency and design) attracted comments from the SDNPA and Southern Water suggesting it should be strengthened while HDC were concerned about it being overly restrictive. Given the importance of climate change mitigation – expressed more widely as the engagement process as gone on –

the Steering Group were minded to retain the criteria and align these more fully to those expressed in the more recently adopted South Downs Local Plan.

- 2.51. Historic England noted that not only should heritage assets be preserved, opportunities should be taken to help people to appreciate their significance. To this end, an additional action was included to develop a Bramber Heritage Trail, which would showcase and provide commentary on the numerous historic assets locally as well as sharing the distinctive history of Bramber, in particular its relationship with the neighbouring settlements and the significance of Bramber Castle and its setting as a dominating feature throughout the ages.
- 2.52. **Environment and Countryside:** The most significant comments received about this section related to the Local Green Space policy. In particular, residents were largely very supportive of the proposal to designate Clays Field as a Local Green Space. This was also welcomed by Historic England, the SDNPA and HDC, although the latter re-emphasised the need for any Local Green Space designations to meet the NPPF criteria. Concerns on this front were raised by the site promoter, who felt that the site was potentially not local in nature and did not meet sufficiently the criteria of being 'demonstrably special'. The Steering Group, in their assessment of Clays Field, found it to meet the criteria. This is set out fully in Appendix B of the Bramber Neighbourhood Plan and in summary:

Close to the community: The green space is surrounded by residential housing and has been a feature of the community for many centuries.

Demonstrably special: The community place a significant value on this particular field due to its historic importance as part of the setting of Bramber Castle. It also contributes greatly to the local landscape and environment. The space has been actively used by residents for recreational purposes, although there is only one public path crossing the site; permission for access has to date been afforded by the site owner.

Not an extensive tract of land: The site is approximately 7.9 ha in size. Initially it was thought that the field might be considered as too large to designate but since the boundaries can be clearly seen from virtually all locations within the site it is now thought that it complies with the criterion. Additionally, there are examples in other neighbourhood plans of sites larger than this that have been designated as a Local Green Space.

- 2.53. The site promoter for Clays Field raised a query about why the green areas neighbouring Clays Field had not also been proposed for designation. The Steering Group have discussed this point at depth and the fields surrounding Clays Field have been further assessed: Burletts, Chelsfield Pasture and Heathens' Burial Corner. Two (Burletts and Chelsfield) were found not to meet the NPPF criteria. The third, Heathens' Burial Corner, was found to meet the criteria and the landowner was contacted to alert them to this and to the fact that the space would be proposed for designated in the Bramber Neighbourhood Plan. An email was received from the site owner on 17 December 2019 to "confirm that [they] are happy for the site to be designated in the Neighbourhood Plan as a local green space. However, this will not confer any rights to the general public to use the space". A copy of this email is contained in Appendix E.
- 2.54. **Transport and movement:** The Highways Authority (West Sussex County Council) raised a query about the introductory text, in particular the claim that crossing the A283 is 'dangerous'. The Steering Group discussed this matter and agreed to leave the text as it was and to include

additional evidence (photographs and a Crash Map) to illustrate this. The most contentious part of the transport section centred on the proposals to support two additional small parking areas near to the Bramber roundabout. These proposals had received mixed reviews at the Options Stage and the Steering Group felt that the strength and breadth of comments received at Regulation 14 justified its removal from the Plan. A further proposal to support the development of more formal parking along Bostal Road received mixed reviews from the South Downs National Park Authority. The site is already used by drivers informally but the SDNPA were concerned that formalising it would potentially be difficult to justify in terms of screening. They proposed instead the possibility of discussions on an alternative site at Annington Hill. The Steering Group agreed to leave both proposals in as community actions for further discussion – primarily because although the Plan seeks to reduce reliance on car transport, there is a general lack of parking for visitors accessing the National Park and this places greater demand on space in the village. Additional small parking sites would help to alleviate this.

- 2.55. **Community facilities:** The policies in this section were very much supported.
- 2.56. **Local economy:** Policy B15 (Commercial premises and land) has been strengthened to bring it more in alignment with Policy SD35 of the South Downs Local Plan.

Stage VI: Final Neighbourhood Plan submission

- 2.57. Following the changes made to the Plan as a result of the Regulation 14 consultation, the Submission Version was submitted to Horsham District Council at Regulation 16. Assuming a favourable outcome, it will proceed to Examination and then to referendum.

3 STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATION ASSESSMENT

Strategic Environmental Assessment

- 2.58. The Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 2.59. Horsham District Council (HDC) is the lead authority for Bramber's Neighbourhood Plan. It has issued a 'standard' screening for all neighbourhood plans within the district. This is included at Appendix F. This states that if a neighbourhood plan is allocating sites for development then it could have a significant environmental impact, therefore a Strategic Environmental Assessment (SEA) is required.
- 2.60. The Bramber Neighbourhood Plan does not allocate sites and it has been confirmed by HDC that an SEA is not required. Nevertheless, a Scoping Report was developed and consulted on between June and July 2019, to determine the sustainability criteria against which the Bramber Neighbourhood Plan should be assessed, to ensure that it contributes to the achievement of sustainable development.
- 2.61. This Scoping Report informed the development of a Sustainability Statement, which was prepared in August 2019 to support the Pre-Submission (Regulation 14) Version of the Bramber Neighbourhood Plan. This Report was consulted on with the statutory bodies (the Environment Agency, Natural England and Historic England) to assist in the determination of whether or not the Bramber Neighbourhood Plan would have significant environmental effects in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.62. Relevant representations were duly taken into account in the final version of the Sustainability Statement and the accompanying Neighbourhood Plan, which accompanies the Submission (Regulation 16) Version of the Plan.

Habitats Regulations Assessment (HRA)

- 2.63. Under Directive 92/43/EEC, also known as the Habitats Directive⁷, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 2.64. A screening opinion in respect of Habitats Regulations Assessment (HRA) was prepared, which was subject to consultation with relevant stakeholders including Natural England. Their response concluded that the *"agree with the conclusion of the report of no likely significant effect upon the named European designated sites"*:

⁷ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.

- *Arun Valley Special Protection Area (SPA) – 16.8km*
- *Arun Valley Special Area of Conservation (SAC) – 14.9km*
- *The Mens Special Area of Conservation (SAC) – 20.4km*

2.65. In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.

2.66. The Scoping Report and the Sustainability Report, including the responses received from the statutory bodies, has been submitted at Regulation 16 stage as part of the evidence base for the Plan.

4 CONCLUSION

- 4.1. The Steering Group has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives. In developing the policies to achieve the vision and objectives, the Steering Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to Horsham District Council.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group and Focus Groups as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.

Appendix A - Diary of significant engagement events and activities - Nov. 2017 – December – 2018


The table below provides a summary understanding of significant events and milestones that have taken place during the two years the Bramber Neighbourhood Plan has been in the making. Importantly it provides detail of how the Steering Group have ensured complete transparency throughout the planning process, and provided residents and all other consultees an understanding of progress at each significant stage during that process.

During the two years of activity there have been, in addition to the events described below, over 20 Steering Group meetings which have all been open to the public and the minutes uploaded to the Bramber Parish Council website.


Many other meetings have taken place between Steering Group, Focus Group members and Horsham District Council Neighbourhood Plan officers, South Downs National Park Planning officers, developers and representatives of developers.

Date of Event	Event	Event Description
November 2017	Parish Council Meeting	Agreement to proceed with making a Bramber Neighbourhood Plan
December 2017	Newsletter to all residents	Detailing Parish Council decision to proceed with Bramber Neighbourhood Plan and requesting volunteers to help.
January 2018	Neighbourhood Plan Steering Group (NPSG) interviewing and formation.	Volunteers came forward as a result of the Dec.17 appeal and were interviewed and selected by Council representatives
January 2018	Inaugural meeting of NPSG	Terms of Reference agreed and volunteers allocated to Focus Groups. The NPSG comprised 13 members at the outset, 7 residents, 6 councillors
February 2018	Plan Area designation	Horsham District Council (HDC) and South Downs National Park (SDNP) agreed designated area as Parish boundary.
February 2018	Steyning Showcase	Bramber parish Council had a stand at the annual Steyning Showcase event and the main theme of the stand was the Bramber Neighbourhood Plan. Much interest and discussion from the many visitors both from Steyning and Bramber
March 2018	Appoint Neighbourhood Plan consultant	Three potential consultants to the plan provided quotes and the Parish Council unanimously selected and appointed Alison Eardley.

Date of Event	Event	Event Description
March 2018	Housing Needs Assessment(HNA)	Aecom requested to carry out a HNA for Bramber
March 2018	Publicity	Agreed that progress on the plan would be made known through a series of Newsletters and Public events as well as having a separate section on the Parish Council website. Minutes of all NPSG meetings would be uploaded to the website plus copies of all relevant associated documents.
April 2018	Parish Council Annual Parish Meeting	Well-attended meeting by residents where Catherine Howe from HDC and the Chairman provided detail on progress to-date and explained where the plan fitted within the HDC Local Plan. Each leader of the Focus Groups presented progress to-date on their own area and what happens next. Lively Q&A session followed with residents showing a keen interest in the plan.
April 2018	Focus Group familiarisation	A number of useful inputs from the previous joint parishes Neighbourhood plan (SWAB) were considered by the Focus Groups and provided a useful understanding of the background and plan process. These included:- <ul style="list-style-type: none"> • Draft pre-submission plan • Bramber residents feedback to a comprehensive survey including a separate youth survey • Housing Needs Survey 2015
April 2018	Sustainability Appraisal incorporating the Strategic Environmental Assessment	The need for a Sustainability Appraisal and Strategic Environmental Assessment was identified when meeting with HDC NP officer. The possibility of AECOM producing the report was considered but, due to timeframe constraints, it was decided to allocate the task to our consultant.
May – July 2018	Call for Sites	A Call for Sites flyer was distributed to all residents and known landowners/estate agents, and a large banner displayed in a prominent position on the central roundabout in Bramber. A one page slot was used in

Date of Event	Event	Event Description
		the local magazine 'Your Steyning' which was distributed to each household in Bramber and Steyning. Two main sites came forward, one in the SDNP the other in HDC jurisdiction.
July 2018	Memorandum of Understanding (MOU)	MOU agreed by NPSG and distributed to Steyning and Upper Beeding Parish Councils.
July 2018	Vision & Objectives (V&O)	V&O statement agreed by the NPSG and Parish Councillors and published on website
September 2018	Housing Needs Assessment(HNA)	The HNA was received from AECOM, commented on, revised, accepted by the SG and uploaded to the NP website.
October 2018	Newsletter to all residents including Steyning residents bordering Clay's Field	The newsletter provided residents with sight of the Vision & Objectives, an update on progress from each of the Focus Group areas, and notification of the forthcoming public event for 24 th November where the proposed policies and current progress could be discussed.
November 2018	Public Event 	Over 200 residents attended the public event, roughly split 50/50 between Bramber and Steyning. Much useful discussion was had and we received over 80 responses back from our survey request to attendees. This represented a significant part of the total attendees bearing in mind that many couples filled in one form between them. This feedback was fed into each of the Focus Groups' further analysis and uploaded to the website.
December 2018	Steering Group Meeting	Norman Kwan and Gavin Curwen from HDC in attendance and clarified the many issues raised by both the residents and councillors in attendance.
January 2019	Newsletter to all residents including Steyning residents bordering Clay's Field	Progress update on NP matters
March 2019	HDC Neighbourhood Plan Conference	Main focus was on the review of the Horsham HDPF and an explanation of the various options to be offered to Parish Councils who were currently in the midst of their Neighbourhood

Date of Event	Event	Event Description
		Plans. The options were to help ensure that Neighbourhood Plans stayed 'in sync' with the progress of the review of the HDPF.
March 2019	Annual Parishioner's Meeting	This was held at St. Mary's House in Bramber, was well attended and gave another opportunity to present progress on our plan from the Focus Groups to the residents of Bramber
April 2019	Upper Beeding Showcase	Bramber parish Council had a stand at the annual Upper Beeding Showcase event and the main theme of the stand was the Bramber Neighbourhood Plan. Much interest and discussion from the many visitors both from Steyning and Bramber
April 2019	Design Codes Report	Commissioned AECOM to produce a Design Codes report to be used in Bramber for the assessment of any future development proposals.
May 2019	Steering Group Meeting	In light of the HDC review of the current Horsham District Planning Framework, Bramber were given a number of options regarding the continuation of their Neighbourhood Plan. It was agreed that due to the advanced stage we were at that we should proceed with the plan committing to reaching Regulation 14 by end of Autumn and a plan review in 2021
July 2019	Plan Report	First draft of plan report available and after feedback from the Steering Group the draft Plan was approved.
August 2019	Newsletter to all residents including Steyning residents bordering Clay's Field	The newsletter explained the stage we were at, how the Regulation 14 consultation period would function, and what would happen after that. Details were provided of the forthcoming public events to be held in September.
September 2019	Receipt of final version of Design Guidelines from AECOM	Report agreed by Steering Group

Date of Event	Event	Event Description
September	Newsletter to all residents including Steyning residents bordering Clay's Field	Further detail provided on the future processes the proposed plan would go through, and a further detailed explanation of when the Regulation 14 process would take place and the various mechanisms available to residents to provide their feedback.
September/October 2019	Regulation 14	The consultation period ran from September 21 st till November 2 nd .
September/October 2019	Two public Events 	Two further public events took place where the final draft version of the Plan was presented to those attending. Smaller yet significant number of residents attended and healthy debate ensued on a number of the policy areas and recommendations.
November 2019	Process feedback from Reg.14 consultees.	All feedback was captured and effectively organised so that the Steering Group and Parish councillors could consider it and decide if changes were required to their particular areas of the plan. We received over 50 responses back from residents, 7 from the statutory consultees and 2 from developers. All responses received were uploaded to the NP website to ensure that residents could get a complete picture if they so desired.
November 2019	Update Plan	NPSG members and Parish Councillors examined all feedback, documented their views on the feedback received and agreed what changes should be made to the final document. The document was updated and agreed by the SG and Parish Council.
November 2019	Produce Consultation Statement	

Appendix B - Bramber Neighbourhood Plan - Implications of the Community Survey findings and work to date

The following table details, by topic area, potential areas the Bramber Neighbourhood Plan could include, bearing in mind the strategic context.

Information to date is drawn from the following sources:

- The 2009 Parish Plan work
- The first Neighbourhood Plan survey (collectively undertaken with neighbouring parishes – data pertaining to Bramber specifically has been extracted).
- Census 2011 figures
- Housing Needs Assessment, 2018 (Aecom)

The strategic context is drawn from the two Local Planning Authorities' Local Plans – for Horsham, the Horsham District Planning Framework and for the South Downs, the emerging South Downs Local Plan.

The commentary column provides some prompts for the topic groups to consider, including potential policy ideas.

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
Housing and development Draft objective: to be established		
Scale of housing <ul style="list-style-type: none"> Majority of residents favoured only small scale, in-fill, building that is in keeping with the historic and scenic nature of the area. (Parish Plan, 2009) HNA suggests approximately 60 homes/5 dwellings per year until 2031 (although this provides no detail on the division between HDC/SNDP) and says little about the classification of 'Small town/large village' incorporating both Bramber and Upper Beeding. 	HDPF <ul style="list-style-type: none"> Policy 3 Development Hierarchy - This sets out that development will be directed to towns and villages that have defined built-up areas and will be in-keeping with the context of the settlement type. Bramber is classified collectively with Upper Beeding as a 'small town/large village'. This classification is for settlements with a good range of facilities and transport links as well as acting as a hub for smaller villages. Notably, many of the services mentioned are located within Upper Beeding as opposed to Bramber, and this should be reflected in the way development is shaped in the future. Policy 4 Settlement Expansion - This sets out the criteria for the expansion of settlements, in particular where this is outside a defined settlement boundary. For Bramber, the village itself sits within a defined settlement boundary and there is little remaining land beyond that, which is not within the SDNPA. Policy 15: Housing Provision - Requires the provision of at least 1,500 homes throughout the district, in accordance with Policy 3, allocated through Neighbourhood Development Planning 'in accordance with the settlement hierarchy'. 	<ul style="list-style-type: none"> Settlement boundary policy- We could include a spatial policy that restates the built up area boundary, incorporating any sites allocated in the NDP. This section will seek to ensure that development is restricted to: <ol style="list-style-type: none"> Sites within the settlement boundary Sites that have been granted planning permission. Sites that are allocated by the HDPF/SNDP Scale of development policy - We could also set out what scale of development we are seeking to deliver (if any) and that would point to the housing allocations – based on the evidence presented in the AECOM and depending on sites available. Individual site allocation policies - Each site allocation will need a map and a description to accompany the policy. Rural exception sites – these are covered by HDC policy. We need to look at what emerging SNDP policy says about them, but we may not need a specific policy about these. <p>We should investigate further the AECOM report in terms of how the allocation offered is split between the two LPAs.</p> <p>Implications of the emerging NPPF?</p> <p>Potential uplift to housing in the next HDPF?</p>

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
	<p>Emerging SDLP</p> <ul style="list-style-type: none"> • Policy SD25 Development strategy - Development will be directed primarily to the defined settlements, of which those in Bramber parish are not specifically listed. The Local Plan will only seek to deliver housing where it has not been brought forward through a neighbourhood plan and is appropriate. • Policy SD26 Supply of homes - Provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033. Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan. 	
<p>Type of Housing</p> <ul style="list-style-type: none"> • Smaller homes – to enable families to live here – HNA suggests encouraging housing that is 2 bedrooms or less, based on single adult need and also to enable downsizing. • Starter homes – including shared ownership • Affordable homes – HNA suggests that AH policy is suitably covered by HDC policy, 	<p>HDPF</p> <ul style="list-style-type: none"> • Policy 16: Meeting Local Housing Needs - Includes support for schemes brought forward via Neighbourhood Development Plans. • Policy 17: Exceptions Housing Schemes - Allows for limited amounts of greenfield land development that would not otherwise be released for general market housing. • Policy 18: Retirement housing and specialist care – Support for provision in accessible locations. 	<ul style="list-style-type: none"> • Housing mix policy – If you are not allocating sites, you might prefer to include a broader policy which sets out the sort of homes you would expect to see bearing in mind the local need. You can include a policy on housing mix, if you can justify that Bramber warrants a different mix to that stipulated in the Local Plans – for instance, focussing on smaller (2-bed or less homes) and of a particular tenure. The Aecom report will help us justify this. • Citing mix within site allocation policies – Or rather than having a generic ‘housing mix’

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<p>therefore no need to include one in the NDP. But we could encourage 'build to rent'</p> <ul style="list-style-type: none"> • Specialist (Retirement) housing – HNA specifies a need for 7 specialist units – advises speaking to neighbouring parishes about how this (and wider strategic need) might be provided. 	<ul style="list-style-type: none"> • Policy 19: Park Homes/ Residential caravan sites – supported where it meets a local need. • Policy 42: Inclusive communities – supports development meeting needs of ageing population, young people etc. <p>SDLP</p> <ul style="list-style-type: none"> • Strategic Policy SD27: Mix of homes – sets out the affordable and market % required for each size of dwelling. • SD28: Affordable homes – sites of 11+ homes, minimum 50% must be affordable; smaller sites have a sliding scale of provision. • SD29: Rural Exception sites – 100% (outside settlement boundaries) where certain criteria are met. 	<p>policy, you could determine the mix of housing type within specific allocations.</p> <ul style="list-style-type: none"> • Specialist / retirement policy – you might have a site that is suitable for this specific need, but I recommend speaking to neighbouring parishes and providers about where such a need might best be delivered in a way that is viable.
<p>Housing Design</p> <ul style="list-style-type: none"> • Residents concerned about protection of flood plains and wished to ensure any future developments did not increase likelihood of flooding • Parking provision for future housing should be off-street. • New housing needs to be 'in-keeping' with what's here already • Encourage 'character' solar panels on buildings, including in the conservation area • Incorporate wildlife and 'green spaces' into any new developments • Smaller developments rather than large estates 	<p>HDPF:</p> <ul style="list-style-type: none"> • Policy 32: Quality of new development – development must be high quality and inclusive based on a clear understanding of the local, physical, social, economic, environmental and policy context for development, meeting certain broad criteria. • Policy 33: Development Principles – sets out broad criteria about design, but without going into specifics at a neighbourhood level. <p>SDLP</p> <ul style="list-style-type: none"> • Policy SD5: Design - Development proposals must adopt a landscape-led approach, respecting local character. 	<ul style="list-style-type: none"> • It would be helpful to set out a description of the current housing design/mix/style in the parish, complete with photographs. There might be aspects of housing that you'd like the plan to encourage, but also aspects that you want to move away from. This can also make reference to the Conservation Area. This description will help to explain to developers what is meant when we say that new development must be 'in-keeping' with its surrounds. • Design policy – We can include a policy setting out design expectations for new developments. This can include any sustainable features we would like to encourage. It would drill into deeper detail

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<ul style="list-style-type: none"> • HNA suggests we need to consider design (currently focussed on detached/semi-detached) in the context of providing smaller homes. 		<p>than that included in the LPs, which tends to be fairly generic. Note that parking standards are likely to be covered by WSCC and we would need to have very robust evidence to move away from their minimum expectations.</p> <ul style="list-style-type: none"> • Note in terms of what we want to see as part of new development (or redevelopment), we can't exceed Building Regulation standards – that would be deemed as too onerous by the Examiner and struck out. • Note too Aecom's point here about how our push for smaller homes needs to fit with the existing style which tends towards larger detached / semi-detached.
Tourism, Commerce and Heritage		
<p>Supporting local businesses</p> <ul style="list-style-type: none"> • 72% keen to support local businesses and farms. (Parish Plan) • Promote 'Buy Local' • Invest in farming • Faster broadband and mobile • Pig farming causing problems? <p>Tourism/ visitor economy</p> <ul style="list-style-type: none"> • 52% want to support tourism, esp. walkers and cyclists. (Parish Plan) • More (obvious) information points, e.g. at Bramber Castle (JS) • More published walking routes (JS) • Support more businesses associated with tourism – hotels, restaurants etc. 	<p>HDPF</p> <ul style="list-style-type: none"> • Policy 7: Economic Growth – encourages sustainable local employment growth through Neighbourhood Plans; encourages the environment to encourage home-working. • Policy 10: Rural Economic Development – sustainable economic development is encouraged to generate local employment opportunities. Countryside development could be farming or contribute to countryside enjoyment; conversion of rural buildings to business/commercial; car parking has to be provided. • Policy 11: Tourism and cultural facilities – this is encouraged, bearing in mind local context; safeguards cultural resources. 	<ul style="list-style-type: none"> • Safeguarding local businesses and retail - We can't influence the type of shops that might come to the parish, but we can safeguard against the loss of existing shops and try to encourage new ones in. This may be sufficiently covered in the LPs. Associated non-land use actions could include rolling out the Buy Local campaign. • Broadband provision – This is likely to be an action as opposed to a policy, to ensure that any new developments are linked to the broadband network. • Employment site allocations - We could explore specific sites for new employment – potentially through allocations, or simply look to protecting against the loss of existing ones.

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<ul style="list-style-type: none"> • More events and promotions of local attractions • Improve signage • Space for motorhomes to park <p>Heritage</p> <ul style="list-style-type: none"> • Protection of historic buildings • Restore the railway line • Adopt 'enhanced' HDC Conservation Area document (which extends the CA) • Blue plaques on buildings • Recording of local events to document history 	<ul style="list-style-type: none"> • Policy 13: Town centre uses – small scale retail development outside defined village centre boundaries can be undertaken if done sustainably. <p>SDLP</p> <ul style="list-style-type: none"> • SD34: Sustaining the local economy – supports development that fosters social/economic wellbeing of communities (subject to criteria) to promote and protect local businesses without compromising the purposes of the SDNP. • SD35: Employment Land – sets out potential employment land that might come forward via NDPs. • SD36: Town and village centres – retail permitted if compatible with location. Loss of units won't be permitted unless they've been marketed for at least 24 months. • SD12: Historic Environment – development only permitted where it enhances historic environment. 	<ul style="list-style-type: none"> • Public realm policy - We could also have a policy promoting improvements to the public realm in the Village Centre. Simple items like more benches or improved signage wouldn't need a policy (they could go into Non-Policy Actions) but more fundamental changes like increasing pavement space would need a policy. • Locally listed buildings – if there are buildings in the parish that are not listed but might be worthy of a 'local listing' we can include a policy with the aim of preserving them. We would need to evidence why they warrant listing locally – Historic England have a template for this. • Railway line – is this relevant to Bramber? We could look at bringing this back into force as a walking route, which is in line with the SDLP. • Tourism promotion – we could include a policy aimed at encouraging the visitor economy, including supporting specific provision. Parking for motorhomes has been noted for instance. This could have associated 'non-land use policy actions' including hosting events, local tourism promotions, providing for improved signage and information points (which could be funded by developer contributions if there are any).
Environment and Countryside		
<p>Green spaces</p> <ul style="list-style-type: none"> • More conservation areas/ nature parks • Protect the playing fields 	<p>HDPF</p>	<ul style="list-style-type: none"> • Local Green Spaces – we can include a policy to safeguard these. There is a template to

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<ul style="list-style-type: none"> Plant more young trees Increase provision of parkland and spaces for sport and recreation Protect all green spaces and woodlands 73% felt it important to protect allotments/ 85% common land/ 75% bridleways/ 97% flora and fauna/ 97% green spaces/ 96% footpaths/ 92% recreation grounds/ 93% rural aspect/ 88% to stop invasive species/ 94% sports fields Care for the riverside Potential Local Green Spaces: <ul style="list-style-type: none"> Clays Field Maudlin Farm Gardens of St Mary's House (Bramber Castle) <p>Views</p> <ul style="list-style-type: none"> 93% want to protect views to and from the South Downs Areas of tranquillity/dark skies <p>Flooding</p> <ul style="list-style-type: none"> 66% of respondents said they did not know about current flood provision. (Parish Plan) Whilst not all areas of the parish are at risk of flooding 89% of respondents wanted Bramber to have a Flood Plan. (Parish Plan) Better flood protection along the River Adur, which may continue to widen as it erodes. 	<ul style="list-style-type: none"> Policy 24: Environmental protection – this policy minimises impacts of development in terms of pollution – noise, air, light, odour. Policy 25: Natural environment and landscape character – landscapes will be protected from inappropriate development; supports proposals which enhance the GI Network; conserve the setting of the SDNP. Policy 26: Countryside protection – ensures that development is in-keeping with local context and safeguards local landscape characteristics. Policy 30: Protected landscapes – seeks to ensure development does not have an adverse impact on the SDNP Policy 31: Green Infrastructure – protects exiting networks, enhances biodiversity. <p>SNLP:</p> <ul style="list-style-type: none"> SD4: Landscape character – development must conserve landscape character SD6: Safeguarding views – sets out types of views that should be conserved. SD7: Relative tranquillity – seeks to enhance this and minimise impacts on it. SD9: Biodiversity and Geodiversity – supports development that enhances this. SD17: Protection of the water environment – developments have to conserve and enhance water features. 	<p>complete to justify their inclusion, against National Planning Policy Framework criteria.</p> <ul style="list-style-type: none"> Protecting local views – if there are specific, iconic, views that you want to protect, this can be achieved through a planning policy. Again we'd need to justify why they warrant particular protection. Flooding – is this still a problem that we need to address? Pollution – Does Policy 24 go far enough (HDC area)? Depending on what the particular issue is, and providing justification, we can include a policy on this. Sustainable energy – Fernhurst included a number of policies about sustainable energy in their NDP. See below table for examples. This was raised in the consultation and could therefore be something to consider. Do you have a Green Infrastructure Plan? Can we use the NDP to support the delivery of any of the actions in there? Horsham Green Infrastructure Strategy, 2014 Provides useful information about existing provision and any deficits. Horsham Green Space Strategy, 2013 to 2023 Also useful as it lists what is currently there.

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<ul style="list-style-type: none"> • Use of natural floodplain management e.g. water meadows. <p>Pollution</p> <ul style="list-style-type: none"> • 60% residents very concerned about noise pollution (inc. from traffic) (Joint Survey) • Someone mentioned light pollution from Bramber Castle <p>Sustainable energy provision</p> <ul style="list-style-type: none"> • Wind turbines/ farms • Solar panels/ farms • River turbines on the Adur? • Bag for Life initiative • Harvesting energy locally in the face of climate change 		
Transport (Highways and PROWs)		
<p>Public Rights of Way</p> <ul style="list-style-type: none"> • Great support for protecting the Prows (joint survey); need to connect foot and cycle paths to make better links between villages. • Concerns about the safety of crossing points on bypass (Parish Plan) • Concern about state of footpaths (Parish Plan) • Horse riding - Community satisfied with existing bridleways (joint survey) 	<p>HDPF</p> <ul style="list-style-type: none"> • Policy 40: Sustainable transport – supports integration with existing networks, opportunities for sustainable forms of transport. • Policy 41: Parking – Broad policy to safeguard existing provision and ensure adequate new provision. <p>SDLP</p>	<ul style="list-style-type: none"> • Neighbourhood plan can sometimes be fairly limited in the way they influence transport issues. Most plans therefore focus on the local transport issues related to walking, cycling and bridleway provision – i.e. promoting sustainable transport in and around the parish can be helpful additions to the Plan. • Movement routes policy – you might try and identify the key services, facilities and other assets in the parish and the key routes that

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
<ul style="list-style-type: none"> • Cycle paths – community are satisfied but not as much as other rights of way. Safety along Downland Road mentioned (joint survey) • Disabled access – most are satisfied, although mention that they could be improved (joint survey) • Footpaths – most people satisfied (joint survey) <p>Traffic speed/ calming/ safety</p> <ul style="list-style-type: none"> • Mixed view on traffic calming in The Street (Parish Plan) • Call for 20mph in The Street and 30mph on Clays Hill – how to enforce? (Parish Plan) • Speeding is a real concern (joint survey) <p>Parking provision</p> <ul style="list-style-type: none"> • 33% feel that parking provision is not sufficient and will get worse (joint survey) • New parking should be off-street (joint survey) <p>Public transport</p> <ul style="list-style-type: none"> • Low number of bus users and roughly half satisfied with frequency, cost, routes and schedule (joint survey) • Better bus link to Worthing would be welcomed and a faster more direct route to Brighton (joint survey) • Mention of a community bus 	<ul style="list-style-type: none"> • SD19 Transport and Accessibility – support for sustainable modes of transport and improvements to existing provision. • SD20: Walking, cycling and equestrian routes – development should contribute to provision (inc. signage). Support for safeguarding disused railways and bringing back into use as non-motorised travel routes. 	<p>link them – and include a policy that enhances these and adds to them as necessary.</p> <ul style="list-style-type: none"> • Providing new/enhanced routes – for instance to connect to other villages/ beyond the immediate settlement. The railway line might link to this. • Traffic speed – this is likely to be dealt with through a non-policy action, for instance setting up a 20s Plenty scheme, lobbying for speed restrictions, speedwatch etc. • Parking provision policy – this is somewhat covered by strategic policy, but you might want to add any local detail to explain any specific problems in the parish – are there specific roads that are problematic? Is there enough non-residential parking? • Public transport – again tends to be difficult to tackle via a NDP but there may be some non-policy actions to take. You could also consider if developer contributions could be put towards public transport improvements (e.g. improved bus shelters etc.).

Information gathered to date	Strategic context (HDC/SDNPA)	Implications for the Neighbourhood Plan
Community facilities		
<p>Community safety</p> <ul style="list-style-type: none"> 65% do not want CCTV (Parish Plan) <p>New / improved assets and facilities</p> <ul style="list-style-type: none"> Consideration of whether to list any community assets to try and secure ownership in the future. Would like a performing arts centre New structure linking library, museum and Penfold Hall – new community asset More events Bikes and running trails Museum Library <p>Young/ teens</p> <ul style="list-style-type: none"> Young people – skate park More for toddlers <p>Medical</p> <ul style="list-style-type: none"> Accessing local GP can be difficult (in terms of waiting times for appointments) 	<p>HDPF</p> <ul style="list-style-type: none"> Policy 43: Community facilities, leisure and recreation – supports provision of new and enhanced facilities. Guards against loss unless an alternative can be found. 	<ul style="list-style-type: none"> Local facilities – are there specific facilities you are lacking? If so, these could be brought forward as part of a site allocation, or using developer contributions. Alternatively you could support them via a broader policy. Are there existing facilities that you want to enhance? Again we can provide a policy to do this. It's helpful to look at the Horsham Infrastructure Delivery Plan – this document has some specific projects associated with Bramber: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/32833/Infrastructure_Delivery_Plan.pdf Horsham District Sport, Open Space and Recreation Assessment, 2014 Provides useful information about existing provision, by parish, and any deficit.

Appendix C - List of statutory consultees contacted

County and District Contacts	Email addresses
Horsham District Council	neighbourhood.planning@horsham.gov.uk
West Sussex County Council	planning.policy@westsussex.gov.uk caroline.west@westsussex.gov.uk
West Sussex Local Access Forum	wslaf@westsussex.gov.uk
Adur and Worthing District Council	planning.policy@adur-worthing.gov.uk

Neighbouring Parish Councils	Email Address
Coombes Parish Council	No email
Sompting Parish Council	harrietjohnsoncentre@sompting.org.uk
Steyning Parish Council	clerk@steypingpc.gov.uk
Stopham Parish Council	brianbarttelot@btconnect.com
Upper Beeding Parish Council	clerk@upperbeeding-pc.gov.uk

Other Organisations	Email Address
EDF Energy - Infrastructure Planning South	john.park@edfenergy.com
Historic England	LondonSeast@historicengland.org.uk
Environment Agency - Solent and South Downs	planningssd@environment-agency.gov.uk
Highways Agency	info@highwaysengland.co.uk
Natural England	consultations@naturalengland.org.uk
Network Rail	TownPlanningSE@networkrail.co.uk
Southern Water	planning.policy@southernwater.co.uk
Sport England	planning.south@sportengland.org
UK Power Networks	Luke.Hughes@UKPowerNetworks.co.uk

Letter to consultees:

September

2019

Dear Consultee

Bramber Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)

I am pleased to invite your views on Bramber Parish Council's proposals for a neighbourhood development plan and associated documents.

This is a Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended).

The following consultation documents may be found at the link below on the Bramber Parish Council website:

- The Bramber Neighbourhood Plan
- Bramber Neighbourhood Plan Design Guidelines
- Sustainability Statement
- Housing report including site assessments
- Evidence base documents

<https://www.bramber.org.uk/neighbourhood-plan>

Please submit your responses to the consultation to:
[insert address details for the Parish Council]

Alternatively you may email your responses to: [insert parish clerk email address]

The consultation period runs for six weeks from Saturday 21 September to Saturday 2 November.

Responses must be received by 9am on Saturday 2 November 2019.

I look forward to hearing from you.

Yours sincerely

Roger Potter

Chair

Bramber Neighbourhood Plan Steering Group

APPENDIX D – Summary of Regulation 14 representatives and response from Steering Group

The table below details the key points raised during the consultation. A full copy of the responses is provided on the Bramber Neighbourhood Plan website⁸.

Respondent Ref:

1. Horsham District Council
2. Environment Agency
3. Historic England
4. Natural England
5. South Downs National Park Authority
6. Southern Water
7. West Sussex County Council Services
8. DMH Stallard
9. Owner of site: Land south of Kingsmead Close
10. Residents comments (41 residents provided feedback)

Policy / Section	Respondent Ref	Representation	Response from Steering Group
General			
General	10	Need to include more references to climate change – perhaps in the Challenges section. Add a para to the vision.	Noted –Amendments made to bring this out more strongly in the Challenges section, Vision Statement and Design Statement.
Throughout	5	Check acronyms for Neighbourhood Plan. NDP preferred to avoid confusion with National Park. Check capitalisation of policy headings.	Agreed to use acronym BNDP. Noted.

⁸ <https://www.bramber.org.uk/regulation-14-consultation>

Mapping	5	Include the SDNP / HDC boundary on all maps.	Noted and amend maps to show this.
Sections 1 and 2	1	Make more reference to the special qualities of the SDNP. Various editing in sections 1.2, 1.4, 1.5, 1.13, 2.4, objectives	Include this within the Policy context section. Agree with suggestions and amended.
	5	Strengthen the reference to the SDNP and SDLP	Agreed.
1.9	8	NDP fails to deliver sustainable development as defined by the NPPF. NDP promotes less development than set out in strategic policies for the area.	The NDP has assessed all sites that were submitted. It has found both sites unsuitable for development for a variety of reasons, which are detailed in the site assessments. This reasoning is supported by the SDNP, HDC and Historic England. Development on these sites would therefore be unsustainable. There is no compulsion for the NDP to allocate sites for housing or other development. In this case, the negative impacts to the two sites that were submitted outweigh the potential positive impact that housing would bring. Should another site or sites become available in the future, these would be assessed on their own merits. The SDLP does not allocate any housing to be delivered in Bramber parish. The HDPF does not allocate a specific number of housing for Bramber; it suggests that a minimum of 1,500 dwellings will be allocated via neighbourhood plans. The NDP has proactively sought to identify suitable sites for housing, but the two sites submitted have been assessed as unsuitable. There is no suggestion in the HDPF that the 1,500 homes to be brought forward through NDPs should be done so on a 'fair share' basis. Clearly some parishes have many more constraints than others. In the case of Bramber, the parish is highly constrained due to its

			heritage and landscape and this has been considered when assessing the sites that have been put forward.
1.11	7	Mention WSCC Waste Local Plan (2014) and West Sussex Joint Minerals Local Plan (2018) should be mentioned.	Additional sentence added to reference to these two documents.
1.14	8	Highlights need for housing. Clays Field is one of the only potential sites available but is not being allocated.	The NDP recognises the need for housing and has assessed both sites put forward through the process. The negative impacts of development on both of those sites outweighs the potential benefits that housing would bring. The parish is severely constrained as a result of its heritage and landscape and this should not be negatively impacted purely because of the very small number of sites put forward.
1.14	10	Bramber is much more rural than its neighbouring settlements and coalescence should be avoided.	The SG has questioned the clustering of Bramber and Upper Beeding within the HDPF as the two settlements are distinct. This is something the SG has addressed to HDC as part of its emerging Local Plan review. Clustering settlements together may not be the best option for individual parishes, since they have their own identities. By being clustered with UB, Bramber has become a Tier 2 settlement, which does not accurately reflect the true situation and is both confusing and misleading.
2.6	8	Highlights the need for additional housing.	Agreed that there is a local housing need. The parish is severely constrained, however, in terms of where housing might go and the two sites that have been put forward for consideration have been assessed as unsuitable for development. Should a further site (or sites) be put forward in the future, it will be assessed on its own merits.
Vision and objectives			
3.1	8	Challenges facing the parish include the need for additional homes for older people	As noted above, the sites put forward have been assessed as unsuitable for development. Should a further site (or sites) be

		and those entering the housing ladder. This is not addressed in the Plan.	put forward in the future, it will be assessed on its own merits. The Plan commits to an early review in light of the emerging Local Plan at HDC.
Vision / objectives	3	Could make specific reference to the 'heritage assets being conserved, enhanced, better understood and appreciated'. Include additional wording related to heritage in the objectives.	The introductory sections have been strengthened and expanded to include specific reference to character and 'historic environment'. Objectives strengthened in this regard.
3.2	8	Final paragraph not being addressed.	The two sites have been assessed as unsuitable. There is no reason why an application for a Rural Exception site could not be considered within the Parish, which would contribute to the particular housing needs of the community expressed in this section.
3.3 objectives	5	Include specific reference to the SDNP, specifically in 1 and 7.	Reference has been included to the nationally important landscape character of the SDNP and its special qualities and the need to conserve and enhance its natural beauty, wildlife and cultural heritage.
3.3	8	Objective 4 – not met	The Plan recognises the local housing need, but no sites are assessed as suitable at this time.
3.3	10	Steyping and District Community Partnership – strongly support objectives 6 and 8.	Noted.
Spatial Strategy			
4.8	5	Clarify sentence.	Amended (making reference to Figure 4.1).

Policy B1: Location of development	1	2 (b) – insert reference to heritage importance of the historic building.	Agreed and amended.
Policy B1	5	Criterion 1 – change ‘focused’ to ‘permitted’. Suggestion to amend clause 2(a) to include reference to impacts on national park.	Agreed and amended. Agreed and included additional text.
Policy B1	10	Important to retain the inter-settlement gap between Bramber and Steyning.	Noted.
Policy B1	10	Support the development of brownfield sites before greenfield. Uses the example of Shoreham Cement works as a site to prioritise within the area for housing, prior to greenfield sites.	The NDP prioritises the reuse of brownfield sites before greenfield, within Policy B1. The Shoreham cement works site is beyond the neighbourhood area and it would be for the local planning authority in that area to determine its suitability for redevelopment.
Housing			
5.2	5	Add the word ‘Authority’ after National Park.	Amended.
5.6	1	Cross check housing numbers with para 1.9 and with Bramber Housing Report	Checked and amended to match figures in Housing Report.
Housing number	10	Supports modest amount of housing on Clays Field, given that it is not kept clear enough for public use.	The site has been assessed as unsuitable for development. Furthermore the Plan seeks to designate the space as a Local Green Space as the site is felt to meet the NPPF criteria for this. It is not necessary for there to be public access to the site to enable this designation, although a public footpath runs across part of the site. To date, however, the owner of the site has permitted public access across the whole site.
Design and Heritage policies			

Policy B2: Character of development	1	Additional text suggested within policy.	Agreed and added to policy.
6.1	3	<p>Welcome this paragraph but could be expanded to include more detailed description of the character and heritage of Bramber parish.</p> <p>Are there non-designated assets we wish to protect? Or heritage assets at risk?</p>	<p>The paragraph has been expanded to include an overview of the historical development of Bramber as a settlement, 17 listed buildings and SAMs.</p> <p>Discussed and agreed that at this stage, it is not required. This could be part of the early review of the Plan.</p>
6.1	5	Suggestion to separate Design from Heritage.	Agreed that Design and heritage should remain together due to the Character of design being intrinsically linked.
6.2	3	Support the identified character areas.	Noted.
Policy B2: Character of development	5	<p>Suggestion to amend text to be in line with SDLP wording.</p> <p>Various policy wording suggested amendments.</p>	<p>Agreed. Replaced 'preserve and enhance' with 'conserve and enhance'.</p> <p>Policy wording is felt to strengthen the policy, agreed.</p>
6.7	1	Footnote missing.	Added in reference to BfL.
6.7	5	Consider replacing Building for Life references with BREEAM.	Agreed this would be helpful and the supporting text has been amended.
Policy B3: Design of development	1	<p>Policy focusses on housing as opposed to all development.</p> <p>Check reference link.</p>	<p>The policy has been slightly reworded to indicate that it relates to all development, unless specifically noted in the clauses</p> <p>Noted.</p>
Policy B3	10	Concern about flooding risks with regard to development upstream.	Flooding is not the responsibility of a NDP, although the policy does include a clauses on the provision of SuDS.
Policy B3	5	Suggestion to include references to sustainable transport and cycle parking provision.	Agreed.

Policy B4: Energy efficiency and design	1	Concerns about policy exceeding NPPF requirements and restating Building Regulations.	The policy has been strengthened in light of the comments received from SDNP and Southern Water. Sustainable design is a focus for Bramber and the policy is felt to be important to include without watering down.
Policy B4	5	Consider including measurable targets – see SD48 point 2.	See comments above.
Policy B4	6	Criterion (e) – supports this and suggests strengthening to set water efficiency standards.	See comment above.
Policy B4	7	Criterion (g) – Make reference to West Sussex Residential Parking Guidance Principle B (4.7 and 4.8) whereby active charging points should be provided as minimum 20% of all parking spaces with ducting provided at all remaining spaces to allow for future upgrading.	Inserted a reference and included this information.
Policy B4	10	Can ‘encouraged’ be strengthened?	The NDP cannot stipulate requirements of developers that go above and beyond national policy and Building Regulations.
Environment and countryside policies			
7.1 onwards	10	SDCP - Can we include something about farmland and its contribution to maintaining flora and fauna.	Noted – added reference to agricultural and grazing land.
Policy B5: Protecting flora and fauna	1	1(a) – make reference to NPPF para 175 (c) and (d). 1(b) – deemed too prescriptive. 1(c) – too prescriptive and changes suggested.	Agreed. Amend as suggested and move the deleted text into the justification. Noted: Amended to: “Development that would result in the loss of, or the deterioration in the quality of, hedgerows will not normally be permitted <u>with the exception of removal for</u>

		Make reference to SNDP protection. Refer to SDLP policies re open space management agreement.	<p><u>vehicular access; in this case the access should include trees at either end of the retained hedgerow to aid wildlife to cross overhead from crown to crown.</u></p> <p>In exceptional circumstances where the benefit of development is considered to outweigh the benefit of preserving the hedgerow, development will be permitted subject to adequate compensatory provision being made. Where the loss of a hedgerow is unavoidable, replacement provision should be of a commensurate value to that which is lost.</p> <p>Added reference into part 1. Noted.</p>
Policy B5	5	Suggested wording change to strengthen policy.	Agreed – amended first sentence to “Development proposals should contribute to achieving <u>are expected to achieve</u> net gain in biodiversity.”
		Criterion 1(b) – suggested amendment.	Agreed – replaced ‘semi-native’ with ‘locally appropriate’.
Policy B6: Green infrastructure	1	Make reference in the policy to wider landscape value, connection to and conservation of the National Park.	Noted and agreed.
Figure 7.2	10	The map needs to be amended to release part of the land owned by resident.	The Environment working group has assessed the collection of individual fields in this part of the parish and assessed each against the criteria. This has determined that both Clays Field and the Heathens’ Burial Ground should be allocated as Local Green Spaces. The latter has been newly identified and the owners of the site have been contacted.
B7: Protection and maintenance	3	Welcome and support the proposal to designate Clays Field a Local Green Space.	Noted.

of Local Green Spaces		Potential to also identify Assets of Community Value.	Discussed and agreed that not required at this stage.
Policy B7	5	Additional supportive text provided to support the designation of Clays Field as a LGS.	Noted.
Policy B7	6	Suggestion to add additional text ref. NPPF para 146.	Agreed and amend. Include reference to NPPF para 146 in conformity reference.
Policy B7	8	Do not agree with the proposal to designate Clays Field as a Local Green Space: it does not meet the criteria of the NPPF. Should other neighbouring fields form part of the Local Green Space.	<p>The potential for Clays Field to be designated as a Local Green Space has been the subject of a great deal of local engagement and assessment. The site is assessed as meeting the requirements of the NPPF in terms of primarily its historic value and its importance to local residents as a green space within an otherwise urban part of the parish. It also provided a habitat for wildlife, with many mature trees and the pond. The assessment has sought the views of landscape and heritage officers at HDC, the SDNP, and Historic England, who support the proposal for designation.</p> <p>There was concern that the site might be considered to be too large for such a designation, however further research reveals that there are examples of Neighbourhood Plans designating larger sites (e.g. Arlesey neighbourhood plan). The neighbourhood plan process gives local people a voice in determining what is important to them locally. Local engagement has heavily swayed toward preserving this space for the reasons provided in the assessment.</p> <p>97% of public responses were in support of the site.</p> <p>The group has further examined the neighbouring fields to Clays Field and this has determined that both Clays Field and the Heathens' Burial Ground should be allocated as Local Green</p>

			Spaces. The latter has been newly identified and the owners of the site have been contacted.
Policy B7	9 (various)	<p>Strong support for designating Clays Field, which is a valued green space. Can the public footpath be shown more clearly on Figures 7.1 and 8.1?</p> <p>Support this policy. The space is an important historic setting with a great sense of place.</p> <p>Clays Field provides an important green corridor.</p> <p>The space as has provided a dedicated recreational area for the local communities of Bramber and Steyning and has, until recently, been maintained to a high standard.</p> <p>The space has been identified by the community as being of particular value and in need of protection.</p> <p>Clays Field should be protected; it is used by residents of all ages and is a valuable community green space.</p> <p>Delighted that Castle Lane is recognised as a route to be protected and preserved.</p>	Noted and amended maps.

Policy B7	10	Can Maudlin Farm and Kingsmead Close be included as LGS?	The group assessed these sites and determined they were unsuitable as they did not meet the criteria.
7.18	7	Make reference to the footpath along the river's western embankment, which would require upgrading to enable additional modes of transport along it. Work with WSCC to achieve this and include in Infrastructure Development Plan.	The landowner has specified that this particular footpath should not be used by cyclists and equestrians due to the damage caused by such activity. There is an alternative route available. Paragraph to be clarified.
Policy B8: Protecting the River Adur corridor	1	Suggestion to strengthen policy.	Amended as suggested.
Policy B8	10	SDCP – Can this footpath (and all footpaths) be improved for all users?	Improving footpaths for users, where possible, is including in Policy B10.
Policy B9: Protection of locally significant views	3	Welcome and support this policy. Suggest including additional detail on why the views are important, in particular where they contribute to the significance of a heritage asset and enable greater appreciation of that heritage asset and wider historic environment.	Noted.
Transport and Movement Policies			
Figure 8.1	7	Add Bridleway 2078 and footpath 2933.	Agreed. Amended map.
8.6	5	Include additional text to reference the use of CIL to enable this action.	Agreed and amended.
8.6 (i)	7	Suggest remove the word 'dangerous' as no evidence to support this.	There has been a fatality and the crossing is avoided, due to volume of traffic and difficulty in finding a space between traffic. Agree to leave the word 'dangerous' in.
8.7	5	Suggest rewording.	Agreed and amended.

8.7	7	Suggest rewording.	Agreed and amended.
Policy B10: Encouraging sustainable movement	5	Criterion 3 - Suggestion that this would be more suited as an Aim. Criterion 4 – Delete as already covered in legislation.	This is an important objective for the group and it was agreed to leave the criterion as is. Removed.
Policy B10	9	SDCP – Concerned about deliverability.	Noted.
8.8	7	Provide additional evidence to support ‘hazards to road users’.	Parked cars in The Street cause concern to cyclists and pedestrians. A photograph of a bus on the wrong side of road, due to parked cars, has been added to illustrate this. Also details of the crash map showing three accidents since reduction of speed limit to 20mph.
8.9	1	Concern about the removal of trees and undergrowth and creation of ‘hole’ in very well-established landscape boundary and buffer that forms part of Bramber Castle’s setting.	Following a request from residents that additional parking was required, only two spots were noted as available, however, these are not popular with residents. The Steering Group agreed to remove proposed car parks, except for the Steyning Bostal car park, where cars already park alongside the road.
8.9 / 8.10	5	Concern about Bostal Road car park proposal – suggest deleting this. Consider instead the potential for parking at location near to Annington Hill.	The Steering Group agreed to retain the call for further discussions about the Bostal Road site and others in the Plan, as an action.
Policy B11: Public car parking	5	As above, recommend removing Figure 8.4 reference. Criterion 4 – could be difficult to achieve given rural location of the village. Consider amending text to ‘should also be considered’ from ‘will be required.’	Agreed and amended. Wording amended to strongly support.
Policy B11	7	Point 1 – Suggested rewording.	Agreed and amended.
Policy B11	10 (various)	Many comments opposing proposed car park near Clays Hill. A selection of responses are provided here:	Noted.

		<p>Opposes the proposal for car parking next to Bramber roundabout – already a difficult area to drive through; concern about tree felling.</p> <p>Opposes proposed new car parking at Clays Hill – concern that it will attract anti-social behaviour; would require removal of trees and greenery; would impact on Greenleaves residents’ privacy.</p> <p>Concerned about proposal for car park at Castle Lane – is not consistent with the objective of creating sustainable transport opportunities.</p> <p>A car park near to Bramber roundabout would be dangerous.</p> <p>Strongly disagree with new car park near to the roundabout.</p> <p>Concern about the Castle Lane car park proposal, which could add to existing difficulties in crossing the Bramber roundabout/ visibility issues etc.</p> <p>Greenleaves resident concerned about the impact of a potential car park at foot of</p>	
--	--	--	--

		<p>Clays Hill – antisocial behaviour already a problem and this might exacerbate it; too much traffic here already and a car park would make this worse.</p> <p><u>Pegasus crossing:</u> Support for the proposed Pegasus crossing at the A283 as it is a popular route with cyclists seeking to avoid the roundabout.</p> <p>Support for Pegasus and reference to NPPF.</p> <p>Should a further crossing point of the A283 be considered south of the roundabout.</p> <p>Safe crossing points along the length of the A283 would be welcomed.</p> <p><u>Buses:</u> Could more be said about the patchy bus service and the need to improve frequency and range of buses serving Bramber? Perhaps a good topic for collaborative working between the two parishes.</p>	<p>A new section has been added to describe the challenges associated with the existing bus service and an Aim has been added, to encourage partnership working with neighbouring parishes to seek support for improvements.</p> <p>The National Trust own the land and English Heritage maintain the monument. An action has been added for the Parish Council</p>
--	--	--	---

		Car parking at Bramber Castle would benefit from improved surfacing and some reorientation of access to the church to facilitate wheelchair users.	to work with the owners to explore ways to increase the number of parking spaces, both here or alternatively at the nearby church.
Policy B11	10	SDCP – Agree additional parking is required, but concerned about the deliverability in such sensitive locations. Could the central car park be expanded?	See above. See above.
Policy B12: Residential car parking	5	Consider parking courts for farmstead developments. Re-order policy to put sustainability points higher up. Incorporate ‘sensitively designed’.	Agreed and amended.
Community facilities Policies			
9.7	1	Potential to include an action to work jointly with partners to increase ease of access to community recreation facilities for young people.	Included as an action in Section 13.
Policy B13: Community facilities at St Nicholas Church	1	Various suggestions to text and ordering of the clauses.	Noted and amended.
Policy B13	10	Comment from Church Warden – fully support proposals to making the church an active space for the whole community. Support.	Noted.

Policy B13	10	SDCP – Support. Also a need to improve access to the building and provide adjacent parking.	See previous comment on car parking provision.
Policy B14: Support the creation of an education centre at St Mary’s House and Gardens	1	Various suggestions to text and ordering of the clauses.	Noted and amended.
Policy B14	10	Support. Need to make sure the offer is different to that provided at the Hub in Upper Beeding.	Noted.
Local Economy			
10.5	1	Suggestion to remove unnecessary text.	Agreed – removed text.
Policy 15: Commercial premises and land	1	Criterion 1 (a) – suggestion to add flexibility.	The policy has been strengthened to bring it more in line with SD35 of the SDLP. Also noted that other neighbourhood plans in Horsham District have included this policy as worded (e.g. Warnham), and found to be sound and flexible enough.
Policy B15	5	Suggest policy is too lenient as it stands. Compare to Policy SD35 and requirements set out in Appendix 3 (p.287) of the SDLP.	See above.
Policy B15	10	SDCP – Support. Does this include the adaptability of disused or appropriate flexibility of redundant farm buildings.	Added to Policy B1.
Section 12 – Infrastructure improvements and provision			
General	7	Are the schemes identified in the IDP policies or aspirations?	These are projects towards which CIL will be prioritised. There is no requirement for a CIL policy in the neighbourhood plan.
Section 13 - Non-Policy Actions			

13.1	5	Is Design and Heritage intended to be left blank?	Creation of a Heritage Trail to be included as a community Action.
Appendices and supporting documents			
Appendix B – Local Green Spaces	1	Make reference to the site having been put forward for consideration as a site allocation. Suggested addition to the text and addition of a photograph illustrating views from within the site to the SDNP.	Agreed. Agreed.
Clays Field	10	Red line denoting the site is incorrect.	Checked and redrawn.
Clays Field	10	Is there further evidence that can be provided to justify the wildlife haven aspect of the site? Also, is there any further justification to underline the perceived value to the local community? Is the site too large to be a LGS?	The data from the Wildlife Trust does not drill down to the level of this particular field, however there is anecdotal evidence of wildlife sightings. There are examples of ‘made’ neighbourhood plans with Local Green Spaces that go up to at least 14 ha. The Examiner said: <i>“In this instance, the ANP identifies some larger tracts of land on the outskirts of the community as Local Green Spaces. But in my judgement, in the local context they are not extensive tracts nor are they in the open countryside, nor are they unreasonably remote from the local community which they serve. The inclusion of each of the larger sites has been carefully justified in terms of wildlife and recreational value. Overall I conclude that the selection of Local Green Spaces is consistent with national policy and advice.”</i>
Clays Field	10	Concerned that Castle Lane is unsuitable for increase in traffic at the junction with Goring Road.	Advice has been sought from the Highways Authority on this point.
Sustainability Appraisal	1	11.4 – typo	Amended.

Site assessments			
Site 2: Land south of Kingsmead Close	5	Include recent update to planning history for this site.	Amended.
Site 2: Land south of Kingsmead Close	10	Why is the site not included when there is an identified need for housing in Bramber? The site could be integrated.	Two sites were submitted, both have been assessed as unsuitable for development. The NDP identifies a local housing need, but the negative impacts of these sites outweigh their potential to deliver housing. The Neighbourhood Plan should not allocate sites on the basis of only few sites coming forward, with disregard for the assessment findings. The NDP commits to an early review and there is opportunity for additional sites to be put forward for consideration.
Site 2: Land south of Kingsmead Close	9	Suggests that given there is an identified housing need locally, this site should be included to contribute towards that. Challenges identified could be overcome by design of the development.	Two sites were submitted, both have been assessed as unsuitable for development. The NDP identifies a local housing need, but the negative impacts of these sites outweigh their potential to deliver housing. The Neighbourhood Plan should not allocate sites on the basis of only few sites coming forward, with disregard for the assessment findings. The NDP commits to an early review and there is opportunity for additional sites to be put forward for consideration.
Additional policies / actions			
New policy	6	Proposes a new policy to encourage and support new and improved utility infrastructure to meet the identified needs of the community, subject to other policies in the plan.	This is covered by Policy 39 of the HDPF and SD44 of the SDLP.
Farming and residential amenity	10	Is there an opportunity to include something that would provide a buffer between new pig farm installations and	This has not been included as it has not been raised as a significant concern locally.

		residential properties, given the potential negative impacts that pig farming can have?	
--	--	---	--

APPENDIX E – COPY OF EMAIL RECEIVED ON BEHALF OF OWNER OF HEATHENS' BURIAL CORNER

From: [redacted]
Date: Tue, Dec 17, 2019 at 11:59 AM
Subject: RE: FW: Heathens Burial Corner, Bramber
To: Roger POtter

Dear Mr Potter,

Thank you for your email.

I have now discussed this matter with my Clients, the management company and the leaseholders and we can confirm that we are happy for the site to be designated in the Neighbourhood Plan as a local green space.

However, this will not confer any rights to the general public to use the space.

Many thanks,

[redacted]

Chartered Development Surveyor

Asset Management Department



For and on behalf of Estates & Management Ltd
Berkeley House, 304 Regents Park Road, London N3 2JX
www.e-m.uk.com

APPENDIX F - Horsham District Council SEA Screening Opinion



Horsham
District
Council

Strategic Environmental Assessment

Screening Opinion

Many thanks for your screening opinion and for providing an indication of what the Neighbourhood Development Plan (NDP) is aiming to achieve.

The EU legislation under Strategic Environment Assessment (SEA) Directive 2001/42/EC, Paragraph 2 of the SEA Regulations 2001/42/EC states that an SEA is mandatory for plans/programmes which are: are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning or land use and which set the framework for future development consent of projects listed in the EIA Directive.

To ensure compliance with the legislation, HDC have taken a uniform approach to screening and require all NDP's allocating sites for housing development to undertake an SEA.

We also recommend a Sustainability Appraisal (SA) is also carried out as this will help demonstrate how the NDP accords with the principles of sustainable development. These two processes can be carried out in conjunction in a combined SA/SEA, which is our preferred approach.

We would welcome the opportunity to provide comments on the Scoping Report and would be happy to review a Draft prior to the formal submission of the NDP. We recommend the District's SA Scoping Report is used as a starting point for your SA work.

With regard the Habitats Regulation Assessments (HRA), if the Plan area is within a 15 km search area of internationally important sites designated for their ecological status (Natura 2000 (N2K) sites or European Sites), a HRA may be required. Please refer to the HRA: A toolkit to support HRA Screening and Appropriate Assessment of Plans http://www.caerphilly.gov.uk/pdf/Environment_Planning/LDP-Examination-Documents/SEW4.pdf

Should a HRA be required we would advise early consultation with Natural England.