



The Neighbourhood Plan

Findon Neighbourhood Development Plan 2016 - 2035

Consultation Statement • January 2016



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1. Introduction

- 1.1 This consultation statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Findon Neighbourhood Development Plan (the Plan). The document should be read in conjunction with the online Evidence Base - Evidence of Consultation section.
- 1.2 The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
1. Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 2. Explain how they were consulted;
 3. Summarise the main issues and concerns raised by the persons consulted; and
 4. Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan
- 1.3 Guidance from Department for Communities and Local Government (10 Sept 2013) states that:

'the consultation statement submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the Plan proposals.'

This Statement sets out details of events and consultations. It lists the activities in which the local community has been involved and the ongoing work of volunteers. The aim of the consultations has been to ensure that there is as widespread as possible understanding of the reasons for, and content of, the Plan.

The Statement demonstrates that there has been extensive community engagement which has informed the community of the progress and content of the Plan.

2. Background

The Plan process, led by the Parish Council, was launched in September 2012; the Parish Council decided that they wanted the local community to have a say in all aspects of the future of the Parish, and set up a working group consisting of Councillors and lay members. In March 2013 a public meeting was held at which the process was explained and volunteers sought. Twenty people volunteered as well as six steering group members (see Evidence Base for Terms of Reference).



Throughout the process members of the Steering Group attended all Neighbourhood Plan forums and briefing sessions held by SDNPA to ensure that the process was inline with their requirements and national legislation,

3. Consultation Chronology

Date	Type	Purpose	Location	Attendees/Recipients	Record	Result
8th Sept 2012	Public event	Publicise NP & recruit volunteers	Findon Sheep Fair, Nepcote Green	General public	Volunteer database May 2013	27 volunteers
4th March 2013	Public meeting	Recruit volunteers	Black Horse, Findon	25 Public + FPC members	Presentation + list of volunteers	20 Volunteers incl 6 for Steering Group
18th March 2013	Private meeting	Discuss NP website	Gun Inn, Findon	PK, KW + School Deputy Headmaster	Steering Group MoM 25th March 2013	School children to set up NP website
May/June 2013	Individual Contact with local organisations	Publicise NP aims & obtain initial feedback	-	51 Establishments	Spreadsheet (hard copy)	24 Positive responses
21st May 2013	Email pre-questionnaire	To check suitability of draft parish-wide survey	-	All current volunteers	Email 21st May 2013	10% response rate
24th June 2013	Contact with SDNP	Detailed the Plan proposals			Email 24th June 2013	
5th July 2013	Contact SDNP	SEA advice			Email July 2013	Confirmed no need for SEA
14th Sept 2013	Public event	Publicise & recruit more volunteers	Findon Sheep Fair, Nepcote Green	General public	Steering Group MoM 7th Oct 2013	13 more volunteers
October 2013	Housing Needs Survey (carried out by AiRS)	Ascertain housing needs in Parish	-	All households in parish	AiRS' Report Nov 2013	Estimated 'Needs'
23rd Jan 2014	Questionnaire	Seek community's views on parish issues & development	-	All 942 households & 45 businesses in parish	Hard copies, spreadsheet analysis of returns + posters	62% response rate MC Analysis of feedback

26th June 2014	Public event	Recruit more volunteers Establish topic groups	Village Hall, Findon	60+ Attendees	Steering Group MoM 21st July 2014	5 Topic Groups formed
24th Nov 2014	Combined topic groups	Preliminary consultation of draft NP	St John the Baptist School Hall	All Topic Group members (22 attendees)	MoM of meeting	Feedback for updating draft NP
18th April 2015	Public consultation	Explain & elicit feedback on draft NP	St John the Baptist School Hall	282 Residents	Steering Group MoM 22nd Apr 2015	JH Analysis of feedback
15th May 2015	Call for Sites	Identify possible sites within settlement boundary	-	All 942 households in parish	Separate letters to households and SDNPA SHLAA landowners	8 responses within boundary + 2 outside boundary
12th October 2015	Meeting with SDNP	Discuss Reg 14		Steering Group Members		Amendments to master document
Publicity						
18th May 2013	Public event	Publicise NP	St John the Baptist School Playing Field	Stand at 'School Revels'	-	General publicity
7th June 2014	Public event	Publicise NP	St John the Baptist School Playing Field	Stand at 'School Revels'	-	General publicity
Website, Facebook						
Findon News						
Sussex Local						
Steering Group Meetings		See evidence Base				

4. Surveys

4a. Housing Needs Survey

Undertaken November 2013 by Action in Rural Sussex every household was targeted. 942 questionnaires were sent out and 367 returned; a 39% response rate. 24 households in housing need who had a local connection were identified (see Evidence Base 41).

4b. Resident and Business Survey



Undertaken in January 2014. All 942 households and 45 businesses targeted. 62% response rate (see Evidence Base 40 for full results).

Summary breakdown of results by topic:

Environment and Sustainability

Key issues

- Maintaining and enhancing the rural nature and identity of the village
- Protection for green spaces
- Pedestrian safety
- Conservation of heritage features
- Village community
- Provision of off-street parking and tidying verges rated as the biggest improvements that could be made

Getting Around

Key Issues

- Speed of traffic
- Road and verge maintenance
- Congestion in the village
- Bus services

Business and Tourism

Key Issues

- Broadband
- Retention of existing employment sites
- No appetite for increased employment sites
- Support for rural diversification

Community Facilities and Wellbeing

Key Issues

- Providing allotments
- Improvements to the Village Hall
- Improved play and other facilities for children and young people
- Improved broadband access

Housing and Design

Key Issues

- Built up boundary must be maintained
- Support for affordable homes inside the BUA
- Off street parking should be provided
- Good design respecting existing character
- Support for conversions
- Over 50% consider current amount of housing is right for the village

5. Web site and Findon News

The Parish web site, findon.arun.gov.uk, was used to publicise events and to provide access to working documents and meeting notes. The Findon News, the Parish newsletter, was used to update residents on progress and publicise events.

6. Open Events

Publicity materials for the open events included letters sent to every home, posters on village noticeboards and in shop windows, banners at entrance points into the village, Findon News articles and web site notices. At each event every topic area was represented by a topic board which set out the progress, the survey results and the draft policies for discussion. Each stand was manned by members of the topic group who were able to discuss issues and make notes of resident's views. These comments were used to amend and support the development of policies (see Evidence Base - Evidence of Consultation for full details).



7. Summary of Housing Site Allocation

In early 2015, no vacant sites existed within the settlement boundary large enough to be allocated for development (a minimum of 5 units per site under extant SDNPA procedures). The Housing & Design topic group was therefore tasked with a proactive remit to look at every possible perimeter site, outside and bordering the settlement boundary, with a view to identifying possible locations for development.

From the very beginning of the group's work it was realised that the central task of site allocation was likely to meet concern within the community, due mainly to the location of the village within the heart of the South Downs National Park and the need to conserve landscape value. Nevertheless every parcel of land was investigated through a process that took into account landscape value, visual impact, access and availability amongst other criteria (refer site assessments elsewhere in this Evidence Base).

As this work progressed it became obvious that there existed a good level of support for small-scale development that would fit into the built context. It was intended that any sites identified would go through a community-led planning workshop, which would look to draw out those elements mostly desired, particularly by the immediate neighbours.

All 18 land parcels on the perimeter of the settlement boundary were formally assessed, with an initial 12 eliminated from further consideration for compelling reasons such as high visual impact (as per the David Hares' Landscape Character Assessment) or on the even more obvious grounds that they comprised a cemetery. Many of these 12 parcels were rejected for more than one reason; for example, some of those with a high visual impact also had community amenity value or economic use.

It followed that the remaining 6 land parcels were all felt to have a lower visual impact, had available access or were not discounted by the reasons the other parcels were eliminated. These remaining parcels therefore underwent a further, thorough (Stage 2) assessment. However, this concluded that none met all the criteria from a landscape, amenity or employment/commercial perspective nor, being green fields or grazing land, could they be said to satisfy the SDNPA's specific duty to 'enhance and conserve the natural beauty of the area'. However, in support of SDNPA's current requirement for Findon to accommodate 20 houses, it was agreed these sites should be given further consideration.

The debate then turned to procedural progression. Should these 6 remaining sites be put to the wider community for consideration and feedback, or should the group embark on the mini planning workshops? In fact, there was a consensus within the NP Steering Group that a community-wide consultation would provide an opportunity to gain more local knowledge around each of the potential sites. It would also ensure trust existed within the community that these sites had not been pre-allocated for development by the Parish Council.

The subsequent community consultation (See Evidence of Consultation April 2015 Event displays) was well attended and the chairman of the Housing & Design group manned the housing topic stand for the day, where it transpired attendees had significant additional information that had not been uncovered as part of the topic group's research. In particular, it became apparent that two of the sites were not in fact available, that there

was existing economic use that had not been immediately apparent and that there was a highly significant, over 73% of the feedback, resistance to the identified sites based upon concern as to the detrimental effect on amenity. The community rejection of the identified parcels confirmed the widespread view that no suitable sites exist beyond the settlement boundary.

A subsequent call for sites within the settlement boundary was undertaken with the support of the SDNPA. This resulted in 9 individual small sites being submitted, most with a capacity of one unit and none with a capacity of more than 2 units. Development proposals for these sites must therefore be dealt with under normal planning procedures.

As a result of the above, and with no community mandate to do so, it has not been possible to allocate sites within the Neighbourhood Plan. There can be no question about the extensive efforts that the group went to, nor to the expertise brought to the remit. Among the volunteer experts in the group were one statistician, three architects, one town planner and one construction company managing director, together with local residents rich in the knowledge of the area and with over 40 years of planning experience.

8. Regulation 14 Consultation

On the 10th August 2015 the Plan was submitted to SDNP for consultation under Regulation 14. The following organisations were consulted by email:

South Downs National Park Authority
West Sussex County Council
Arun District Council
Natural England
The Environment Agency
English Heritage
The Highways Agency
NHS Coastal West Sussex CCG
Southern Electric
British Gas
Southern Water
Sussex Police
CPRE
Clapham Parish Council
Patching Parish Council
Angmering Parish Council
Worthing District Council

All residents of the Parish via the Parish Council web site.

9. Regulation 14 responses (full copies in Evidence Base)

Consultee	Section	Response	FNDP Comment
Historic England	3.1	We welcome the detailed history of the development of Findon and the Parish in sub- section 3.1 (although this could helpfully be shown on a map of the village) and the Character and Heritage Report. However, although the latter contains even greater detail on the history of the village, it does not really deal with the character of the village. We note the Village Design Statement but beyond that has there been any detailed character assessment undertaken of the parish as a whole ?	Discuss who to strengthen this section.
Historic England	5.6	We are disappointed that neither the Vision for Findon Parish in 20 years' time nor the core objectives specifically refer to the conservation and enhancement of the historic environment of the parish. However, we welcome the third Objective under 5.6 Environment and Sustainability although we would prefer "Conserve and enhance...." and we would like to see an objective for the conservation and enhancement of the Conservation Area and perhaps the scheduled monuments in the parish (we suggest that the third Objective be reworded as " <i>Conserve and enhance designated and non-designated heritage assets (including listed buildings, scheduled monuments, the Conservation Area and buildings of special character) which contribute to the heritage value and setting of the Parish</i> ".	Agree amendment
SDNP	Appendix 1	Appendix 1 - It is Arun District Council which holds the register of ACV rather the local planning authority.	Amend

Consultee	Section	Response	FNDP Comment
Historic England	3.3.5	<p>The National Heritage List for England identifies 26 listed buildings in Findon parish, not 25 as stated in sub-section 3.3.5. The NHLE also identifies seven scheduled ancient monuments, including a Bowl Barrow 120m north-west of the property known as "Cissbury", which is shown on the map in the Character and Heritage Report but not included in the key to the map. It would be helpful to explain what the special interest of the Conservation Area, when it was designated, whether it has ever been reviewed and whether there is a Conservation Area Character Assessment and/or Management Plan.</p> <p>We suggest there should be a reference in the Plan to any non-scheduled archaeological remains, information on which is available from the West Sussex Historic Environment Record, and we would welcome a reference to the West Sussex Historic Landscape Characterisation. (The National Planning Practice Guidance states "...where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.")</p>	<p>New map added to data base and note about non scheduled remains. Cannot add the sussex historic landscape characterisation as we did not use this in our determination as we were not aware of its existence.</p> <p>Conservation Area details improved.</p>
SDNP	3.3.9	3.3.9 – Census data should be provided here to support the statement on housing mix. Details of dwelling size would also be useful here.	Look at this. Add census data as an Appendix
SDNP	3.4.5	<p>3.4.5 - Roads and traffic – it is agreed that traffic is a big issue for the village and it is a big challenge to address this issue whilst not losing any parking spaces. Given that the crossroads is a critical point in the road system and the core of the existing Conservation Area, some sort of public realm enhancement/ shared space type scheme should perhaps be considered. This notion could be incorporated into a Conservation Area Appraisal and Management Plan (CAAMP) prepared by the SDNPA and should be supported by FNDP Policy GA6. The FNDP could be more proactive and seek to do a feasibility study looking at the area with the aim of putting a funding package together and implementing the work.</p> <p>The SDNPA will shortly be launching in mid October 'Roads in the South Downs' – a guide and resource providing details of place-making traffic management interventions that are fitting within the National Park context.</p>	Amend policy and refer to work planned to promote better traffic management.

Consultee	Section	Response	FNDP Comment
SDNP	Appendix 2	Appendix 2 - Show Local Green Spaces on a map in the document. LGS protection of PRow is unnecessary as they are afforded separate protection. We'd also question whether PRow and small areas of verge meet the LGS criteria as set out in the NPPF, in particular can such verges be considered to be demonstrably special.	Map omitted in error. Believe that verges can be demonstrated to be special by virtue of their impact on the street scene and contribution to the rural feel of the Parish.
SDNP	BT1	<p>Policy BT1 - Policy requires clarification. Currently the wording may undermine the intention of the policy– “Proposals to upgrade, convert or extend existing employment sites...” could lead to the conversion to other uses.</p> <p>Proposals should also be subject to acceptable impact on the landscape, wildlife and cultural heritage.</p>	Happy with the policy. Will add ‘ acceptable impact on the landscape, wildlife and cultural heritage’ to the policy wording and remove the word convert.
Arun DC	BT1	<p>The second part of this policy (...provided that the impact on the amenities of surrounding properties is acceptable.) needs re-wording.</p> <p>How will this be assessed/quantified? How will this be used by DC?</p>	See above - could add by virtue of noise, size traffic but think it unnecessary
SDNP	BT1.3	BT1.3 This paragraph reads as policy and should be placed in a policy box with appropriate caveats i.e. conditions will be used to prevent the subsequent conversion of office space to residential use. Develop policy wording on home working.	Agree but the imposition of conditions is for the LPA not the NP. See new policy BT10
SDNP	BT2	BT2 - There will be strategic policy in the SD Local Plan on this topic. Draft policy SD28 Employment Land should be reviewed to see where FNDP policy can provide additional detail if necessary.	<p>There is no requirement for the Neighbourhood Plan to be in general conformity with the strategic policies of the emerging Local Plan. Also at this early stage of the SDNP Plan there is no certainty that the policies will remain. We would therefore wish to retain our policy.</p> <p>Removed the word ‘service’</p>

Consultee	Section	Response	FNDP Comment
Arun DC	BT2	The policy need re-wording to make it more robust and usable by DC. The last sentence should be deleted. (Ensure any residential ...)	Don't agree. The last sentence is important as there are many examples where new development has caused the closure of existing businesses due to noise etc. Policy text improved.
SDNP	BT3	BT3 - Policy should also consider the impact on landscape, wildlife and cultural heritage.	Will add ' acceptable impact on the landscape, wildlife and cultural heritage' to the policy wording.
Arun DC	BT3	Any application should be judged on merits – i.e like scale, impact, benefits. There is no evidence present to support reasons in the supporting text. The policy also does not appear to take into account the new provisions for permitted development for changes of use. It is recommended that the policy is re-written.	See above. Justification appears sound. Policy does take into account changes to PD rights.
SDNP	BT4	BT4 - There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policies SD29 Town and Village Centres and SD52 Shop Fronts should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording appears to undermine one of the aims of the FNDP to protect local shops and is unclear about which Local Plan policy it is referring to.	The policy does not undermine the policies of the FNDP to protect local shops it in fact strengthens that commitment.
Arun DC	BT4	Any application should be judged on merits – i.e like scale, impact, benefits. There is no evidence present to support reasons in the supporting text. The policy also does not appear to take into account the new provisions for permitted development for changes of use. It is recommended that the policy is re-written.	The policy takes this into account. It says that it will be supported providing it meets criteria. Policy does take into account changes to PD rights.
SDNP	BT5	BT5 - Policy should contain caveat that any removal of parking provision will be subject to it being demonstrated that there will be no adverse impacts on the local vicinity.	Not needed. The policy makes it clear that removal is not an option.

Consultee	Section	Response	FNDP Comment
SDNP	BT6	BT6/7 - See emerging SD Local Plan policy SD52 Shop Fronts. Can policies BT6 and BT7 be combined? Also ensure there is no conflict between these two policies.	We will look at how to combine the policies.
Arun DC	BT6	Where is the evidence to support this policy. How will DC use this policy? Illuminated signs and advertisements will not be permitted? 'In keeping with the surrounding area' – which is what?	The policy is clear. Illuminated signs will not be permitted. This is in line with SDNP dark skies policy.
Arun DC	BT7	What is the definition of signage 'clutter'? There seems to be confusion of what a neighbourhood plan can do and what is the responsibility of the Local Planning Authority.	The Dept for Transport publish an advisory leaflet relating to reducing signage clutter - see https://www.gov.uk/government/publications/reducing-sign-clutter . It is an established term. The policy seeks to support signage but not allow over use of signs.
SDNP	BT8	BT8 - There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policy SD20 Sustainable Tourism and the Visitor Economy should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording should also refer to adverse impacts on wildlife and cultural heritage.	There is no requirement for the Neighbourhood Plan to be in general conformity with the strategic policies of the emerging Local Plan. Also at this early stage of the SDNP Plan there is no certainty that the policies will remain. We would therefore wish to retain our policy. Add line re impacts on wildlife etc.
Arun DC	BT8	What are 'unacceptable impact on adjacent residential amenity'? How will DC effectively use this policy?	See above. Arun DC and other LPA's regularly use the term 'unacceptable impact on adjacent residential amenity'. It is a normal planning term.

Consultee	Section	Response	FNDP Comment
SDNP	BT9	BT9 - This policy suggests general support for communications infrastructure which includes telephone masts. Appropriate caveats should be included to protect the National Park special qualities. There will be a development management policy in the SD Local Plan on this topic. Draft policy SD57 should be reviewed to see where FNDP policy can provide additional details if necessary.	Add detail about effect on the SDNP
SDNP	CFW1	CFW1 - This policy needs to set out the planning criteria that proposals will need to meet. The policy currently doesn't provide clarity for applicants or the decision maker	Policy is sufficient for a NP. Remove 'and it meets planning criteria'
SDNP	CFW2	CFW2 - What are 'appropriate' proposals? Policy needs to give clarity for applicants and decision makers.	Remove word appropriate. Add 'siting. design etc.
SDNP	CFW3	CFW3 - Provision of recreation facilities should also be in keeping with the landscape character. CFW3.1 – appears to use the wrong tense – “and visitors but has have identified a need...”	Add ' landscape character' to text. Amend typo
Arun Dc	CFW3	What is the evidence to support this policy? Suggest re-wording especially the first sentence 'Existing open spaces including school playing fields, outdoor sport and recreation land should not be built on.'	Do not agree
Arun DC	CFW4	Are there parcels of land formally designated as allotments? Might want to justify this a bit better than the map which shows one site.	This is what Map 1 shows?

Consultee	Section	Response	FNDP Comment
SDNP	CFW5	<p>CFW5 - The following text is taken from the Community Right to Bid scheme which was provided under the Localism Act. The following text should be considered when reviewing Policy CFW5.</p> <p>A building or piece of land will be deemed to have community value only if:</p> <ul style="list-style-type: none"> • The use of the land or building currently, or in the recent past, furthers the social wellbeing or cultural, recreational or sporting interests of the local community. • This use (as described above) of the building will continue to further the social wellbeing or interests of the local community. • The use of the building or land must not be deemed 'ancillary', i.e. of secondary purpose. This means that the use of the land or building to further social well-being or interests of the community must be its principle use. <p>If a building or piece of land is listed as an 'asset of community value' and the owner wants to sell the asset, they must inform the local authority. This will then trigger a moratorium period during which the owner cannot conclude the sale of the asset.</p> <p>The relevant Local Authority holds the register of assets of Community Value – in this case Arun District Council. Registration is a separate process to the preparation of the NDP.</p> <p>In light of the guidance above we suggest that you review the properties and land identified in Appendix 1. Is there any prospect of the asset being sold and equally is there any prospect of the community wanting to or being able to purchase it?</p> <p>For clarity and to provide certainty to the decision maker, the policy should refer to Assets that are on the register of Assets of Community Value.</p> <p>The final sentence of the policy needs clarifying – what is a 'reasonable price' and it is unclear what service trade uses are. Emerging SD Local Plan policy SD53 New and Existing Community Infrastructure should be referred to in reviewing this policy.</p>	<p>The NP team was fully aware of the criteria when the allocations were made. They reflect the community aspirations. Whether or not there is a prospect of the property being sold is not a test of the NPPF.</p>

Consultee	Section	Response	FNDP Comment
Arun DC	CFW5	This is written like the NDP can make decisions on what is included on the assets register. This has its own process and so the policy should be re-worded to reflect this. The parish council should ensure they register the buildings using the procedure to mitigate any unwanted circumstances in the future. Paragraph CFW5.2 needs to take into consideration the new change of use rights.	Don't agree. The policy says ... that may be included.. there is no decision in the statement
Southern Water	CFW6	<p>To ensure consistency with the NPPF and the NPPG, we propose the following additional wording to policy CFW6:</p> <p>The Parish Council has designated areas shown in Appendix 2 and accompanying map as Local Green Space. Proposals for development of these areas will not be permitted except in special circumstances</p> <p>Exceptions will only be made:</p> <ul style="list-style-type: none"> • where the benefits of development can be shown to outweigh any harm, such as where the development meets specific necessary infrastructure needs, and there are no reasonable alternative sites available; or • in the case of development of school playing fields, where a school is being reconfigured with no net loss of playing field area or relocated to a suitable, larger site in the neighbourhood. 	BRNP Examiner comment - Southern Water has suggested inclusion of an additional policy relating to infrastructure provision. There is no requirement for a neighbourhood plan to include any particular type of policy. Whilst I would have no objection to inclusion of a policy as suggested I have not recommended a modification of the plan in this respect as such modification would not be necessary in order to meet the basic conditions or other requirements.
SDNP	CFW6	CFW6 - Reference should be made here to Appendix 2 providing the justification for Local Green Space designations. The Local Green Spaces will need to be shown on a map.	Add map - oversight in production- map available.
Arun DC	CFW6	Local Green Space: do they meet the criteria expressed in the NPPF?	Need to add references to the NPPF in light of recent Examiner comments at Aldingbourne
SDNP	CFW7	CFW7 - Clarification is required for the unlit village status. Further information is required to help explain this status and the implications for future planning applications. The policy should be reviewed in light of emerging SDNP Local Plan Policy SD9: Dark Night Skies	The policy seem self explanatory

Consultee	Section	Response	FNDP Comment
Arun DC	CFW7	This is written as more of an inspiration than policy. How is DC going to use this?	ADC seem not to be aware of the SDNP Dark Skies policy.
WSCC	CFW8	Policy CFW8: It is suggested that this policy is less prescriptive – please refer to the County Council’s Revised County Parking Standards and Transport Contributions Methodology, which can be accessed via the link above.	Policy is a response to local parking problems and we wish to keep it.
SDNP	CFW8	CFW8 - Repetition of policies GA4 and BT5. Remove policy.	Agree
Southern Water	ES1	To ensure consistency with the NPPF and NPPG, we propose the following additional wording to policy ES1: New development within the Local Gap identified in the 2003 ADC Local Plan and shown in Map 2 will not be permitted, except in special circumstances, such as where the development meets specific necessary utility infrastructure needs and no alternative feasible site is available.	BRNP Examiner comment - Southern Water has suggested inclusion of an additional policy relating to infrastructure provision. There is no requirement for a neighbourhood plan to include any particular type of policy. Whilst I would have no objection to inclusion of a policy as suggested I have not recommended a modification of the plan in this respect as such modification would not be necessary in order to meet the basic conditions or other requirements.
Southern Water	ES1	To ensure consistency with the NPPF and other government guidance and facilitate sustainable development, we propose the following additional policy: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.	I don't feel this is necessary. They have sufficient statutory powers. Discuss
SDNP	ES1	ES1 - The Arun 2003 Local Gap policy will be superseded by the SD Local Plan. To future-proof this policy reference should be made to emerging strategic policy SD5 Landscape Character which refers to the protection of existing undeveloped gaps between settlements.	Agree but we have also added a map showing the gap

Consultee	Section	Response	FNDP Comment
Arun DC	ES1	This policy needs to look at the SDNP area as well as take into account the emerging ADC Local Plan which is at examination stage. It therefore needs to reflect the current situation.	The ADC Local plan is not at examination stage - it has failed. There is no requirement to take an emerging plan into account.
WSCC	ES2	<p>Policy ES2: It is suggested that this policy is re-worded to the following: Local improvements and redevelopment should aim to reduce the overall level of flood risk in the area through negotiations and use of developer contributions:</p> <ul style="list-style-type: none"> · Surface water management measures will be required for development proposals to ensure that the risk of flooding both on-site and off-site is not increased and opportunities to reduce existing flood risk are taken where possible. · Consideration must be given to the use of Sustainable Urban Drainage Systems (SUDS) as alternative to conventional drainage where appropriate. Sustainable drainage systems on private property, whether they are private or adopted, must be approved by the Local Planning Authority prior to the commencement of development..... <p>The reasons being that a) new development has no requirement through planning to reduce flood risk (except through negotiations/voluntary betterment) and b) the NPPF states development should not increase the existing level of risk on site or downstream anyway, so they would not meet the national policy if it was increased even slightly. And c) the County Council does not approve SUDS, we only comment on applications.</p> <p>It is unclear what is meant by the 'flood risk register' – please specify who holds this document.</p>	In 2010, the Government passed a new Act, the Flood and Water Management Act, which identifies a Lead Local Flood Authority (LLFA) to establish and maintain a register of structures or features which, in the opinion of the authority, are likely to have a significant effect on a flood risk in its area.
SDNP	ES2	<p>ES2 The SDNPA is the approval body for SUDS and will make the decision on the suitability of sustainable drainage provision in consultation with the Lead Local Flood Authority (WSCC).</p> <p>There will be development management policy in the SD Local Plan on this topic. Draft policy SD42 Sustainable Drainage should be reviewed to see where FNDP policy can provide additional detail if necessary. Also, the policy is not clear when a Flood Risk Assessment will be required and appears to imply one is required for all development proposals which is not in line with NPPF paragraph 103.</p>	<p>Change wording to reflect SDNP not WSCC</p> <p>The policy does not imply all development</p>

Consultee	Section	Response	FNDP Comment
Arun DC	ES2	the first bullet could be difficult in terms of compliance. With the reference to “downstream”, probably best for this to be removed. Some of the text can be moved to supporting.	Surely that is the normal function of SW management. Flooding downstream has been a major issue nationally and locally. It is reasonable to ask for plans to address these issues
SDNP	ES3	ES3 - There will be development management policy in the SD Local Plan on this topic. Draft policy SD37 Trees, Woodland and Hedgerows should be reviewed to see where FNDP policy can provide additional detail if necessary. PolicyES3 is currently very generic and doesn't contain anything locally specific to Findon.	Keep the policy but add ' ... a Findon TPO
SDNP	ES4	ES4 - There will be development management policy in the SD Local Plan on this topic. Draft policy SD56 Renewable Energy should be reviewed to see where FNDP policy can provide additional detail if necessary. PolicyES4 is currently very generic and doesn't contain anything locally specific to Findon.	Happy with the policy as it is
Arun DC	ES4	This is quite a restrictive criteria based policy. What is the evidence to support this? Last sentence reasonable and enforceable. Would NPPF and SDNP designation be sufficient?	Happy with the policy as it is
SDNP	ES5	ES5 - Title of text is missing the word 'Special'. Policy ES5 contains a list of “Buildings and Structures of Special Character” which were so identified by Arun DC. These are what are more normally referred to as “Local Listings”. The criteria against which these buildings have been tested should be clearer and, ideally, should be those which the SDNPA will be using when we put together a SDNPA Local List.	Add word ' special'. It is not for this Plan to determine how ADC chose their list of such buildings. This mPlan merely seeks to retain them.
Historic England	ES5	We welcome Policy ES5 (the appendix to this letter contains a link to our advice on local listing) and, in principle, Policy ES6, although we would suggest the policy be slightly revised as follows: “Proposals that would adversely affect the special interest of the Conservation Area or its setting, or of any future Conservation Areas or Areas of Special Character will not be supported”. A Conservation Area Character Assessment would be helpful in identifying land important in the setting, and views into and out of, the Area.	Noted

Consultee	Section	Response	FNDP Comment
Arun DC	ES5	The whole policy needs to be in the box. At the moment it starts and stops. Some of this policy text needs to be in supporting text. It is recommended that this policy is worked up in conjunction with the SDNP .	Move the words from .. The Parish.. into the supporting text
Historic England	ES6	We welcome Policy ES5 (the appendix to this letter contains a link to our advice on local listing) and, in principle, Policy ES6, although we would suggest the policy be slightly revised as follows: <i>“Proposals that would adversely affect the special interest of the Conservation Area or its setting, or of any future Conservation Areas or Areas of Special Character will not be supported”</i> . A Conservation Area Character Assessment would be helpful in identifying land important in the setting, and views into and out of, the Area.	I do not know what the ‘ special interest ‘ of the CA means.Add at their request.
Arun DC	ES6	Map 3 is not quite legible.	Will be better res. in final document
SDNP	ES7	ES7 - It would be helpful to compliment this policy with example photos and a map of the flint walls identified for protection. Should the policy also support proposals to retain and enhance flint walls?	Could add ‘ retain and enhance’. We have some photos and they could be mapped but I need help with identifying them on a map. Policy is robust as it is.
Historic England	ES7	We welcome Policy ES7	Noted
SDNP	GA1	GA1 - The aims of this policy are welcome although the measures may be difficult to enforce. The words ‘sustainable transport’ access to nearby towns... appear to be missing from the final sentence.	Add words to policy
SDNP	GA1.3	GA1.3 - As bus services are not a land use issue and therefore beyond the scope of a NDP, it would be more appropriate to state that the Parish Council will promote community liaison with bus service providers rather than the Plan.	Agree

Consultee	Section	Response	FNDP Comment
WSSCC	GA2.1	GA2.1: Please explain further what is meant by promoting the maintenance of existing footpath and bridleway network. Also, it is encouraging that the Plan acknowledges an issue of poor crossing of the A24 for horse-riders, though this applies as much for cyclists. Support for improvements could be stated as aspirations or proposals within the Plan.	Explain intention more fully.
SDNP	GA2.1	GA2 - It would be helpful to include a map of footpaths and cycle paths within the FNDP. Recommend that text of the policy is clarified as follows: "Specifically there is support will be given for new cycle links..."	There is a PROW map in the evidence base
WSSCC	GA3	Policy GA3: The use of developer contributions to support maintenance and improvement of paths for non-vehicular modes is supported. However, it should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with the South Downs National Park Authority and other Local Planning Authorities to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services.	Noted
SDNP	GA3	GA3 - This policy reads as a priority list for future CIL receipts rather than a land use policy to be used in the determination of planning applications. It is not clear what 'developer contributions' are in addition to CIL? Infrastructure priorities can be identified in the FNDP and should also be forward for inclusion in the SDNPA Infrastructure Delivery Plan (IDP).	Noted
WSSCC	GA4	Policy GA4: For residential development, please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator, which can be accessed via the following link: https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/	The policy merely supports the maximum level. No change needed.

Consultee	Section	Response	FNDP Comment
SDNP	GA4	<p>GA4 - National guidance contained in the Ministerial Statement of the 25th March relates to the need to ensure there is adequate parking provision both in new residential developments and around town centres. The thrust of the statement was concerned about the imposition of maximum parking standards. The Statement states that Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network. It is therefore recommended that the reference to maximum parking in this policy is removed.</p> <p>It is also not clear which Local Plan standards the policy is referring to. Currently West Sussex County Council have recommended parking standards. The SD Local Plan development management policy SD44 Car and Cycle Parking Provision refers to appropriate adopted parking standards in the locality and the provision of a parking standards SPD in future.</p>	Change wording to reflect the WSCC Parking Standards as The Plan
Arun DC	GA4	What is the evidence to support that 'Development proposals will be supported only if they include the maximum level of off street parking ...' ?	See above
SDNP	GA5	GA5 - This is not a land use policy that would be used in the determination of the planning applications. The measures referred to in the policy are all highways works. You may wish to include a community aspiration / project to address A24 improvements.	It would be used if we proposed traffic calming measures that changed the use of land.
Arun DC	GA5	This is written like more of a community project than a policy so recommend revision or moving to the back.	See above
SDNP	GA6.1	GA6.1 -Repetition of GA2.2.	Relevant as justification for both policies
Historic England	GA6.2	We welcome the initiatives in paragraphs GAS6.2 and GA6.4. The former English Heritage part-funded a project on traffic calming in conservation areas which may be of interest to you: (http://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Highways- Protocol-3.pdf)	Noted

Consultee	Section	Response	FNDP Comment
Natural England	HD1	Policy HD1 appears to set a limit on the scale of development (20 dwellings) and to ensure they are provided within the settlement boundary. I was not able to find a plan indicating any preferred sites. Nevertheless, the development is unlikely to result in significant effects on designated habitats; although of course, close consultation with the SDNP is essential when proposals come forward.	Noted
Clapham PC	HD1	HD1 - feel that the housing number is too low	This is more a comment for SDNPA

Consultee	Section	Response	FNDP Comment
David Hutchinson	HD1	<p>HD1 - The number of 20 new dwellings is the SDNPA housing requirement for the period of the emerging Local Plan to be met by site allocations in the FNDP, or if not, by allocations in the SDNPA emerging Local Plan.</p> <p>The total number of new dwellings for the period comprises 20 on allocated sites, plus existing planning consents (7 in Findon), plus a windfall allowance. (SDNPA Preferred Options Sept 2015, Policy SD23) which in effect will be nearer 35 than 20 dwellings.</p> <p>The FNDP however does not allocate any sites to meet the requirement nor does the SDNPA Preferred Options 2015 allocate any sites in Findon (assuming that the FNDP would allocate sites). The FNDP is therefore likely to be considered not to be in conformity with the emerging Local Plan and either sites will have to be allocated in the FNDP or SDNPA will allocate sites in the final version of the Local Plan.</p> <p>The Examiner is also unlikely to allow the FNDP to proceed to referendum until site allocations are included or the FNDP states clearly that the sites will be allocated by the SDNPA and the general introduction to the FNDP is amended to say that the opportunity to allocate sites is not being taken up.</p> <p>The term 'pre allocated' in the policy has no clear meaning in planning terms. The SDNPA have prepared a Findon SHLAA, based on the 2006 Arun SHLAA, but a SHLAA is not a site allocation or 'pre allocation'. The FNDP Evidence Base includes a FNDP SHLAA but the policy background makes no reference to this SHLAA and again a SHLAA is not a site allocation(s) or 'pre allocation'.</p>	<p>Neighbourhood plans are a reflection of the thinking and aspiration within the local community.</p> <p>The NP indicates preferred uses for sites and establishes development principles; it does not however, include any allocations of land for development as there is no requirement for a neighbourhood plan to include allocations.</p> <p>There is no requirement for the N Plan to be in general conformity with the strategic policies of the emerging Local Plan,</p> <p>The Basic Conditions require the neighbourhood plan to contribute to the achievement of sustainable development. There is no requirement as to the nature or extent of that contribution, nor a need to assess whether or not the plan makes a particular contribution. The requirement is that there should be a contribution. There is also no requirement to consider whether some alternative plan would make a greater contribution to sustainable development.</p> <p>The N Plan, by guiding development to sustainable solutions, contributes to the achievement of sustainable development in that it:</p>

Consultee	Section	Response	FNDP Comment
SDNP	HD1	<p>HD1 - We have fundamental concerns about the approach proposed in Policy HD1.</p> <p>We do not consider “the ambition of the neighbourhood [to] be aligned with the strategic needs and priorities of the wider local area.” (as required by NPPF para. 184). Neither has the FNDP presented a positively prepared approach to identify sites to meet the housing requirement in SD Local Plan draft policy SD23. While the FNDP begins by stating local people should make decisions on what changes will occur, the Plan itself defers the key decision on allocating housing sites to the SDNP A.</p> <p>The first criteria of policy HD1 states that development proposals must be within the settlement boundary. There is no evidence presented to justify why this should be the case and the consideration given to other options is not set out in the Plan. We are aware that the NDP group have commissioned a landscape character assessment in preparing the FNDP, the results of which should be made available in support of the policy approach. As you are aware the SDNPA SHLAA has taken a landscape-led approach to the assessment of potential development sites, and has found suitable sites outside the settlement boundary.</p> <p>The SDNPA is unlikely to allocate sites within a settlement boundary as these sites are normally smaller than the 5 or more dwelling cut off for SDNPA site allocations. However we have recognised that Neighbourhood Development Plan groups may wish to allocate smaller sites.</p>	<p>See above.</p> <p>We need to make sure the Evidence Base and the Consultation Statement reflect adequately all of the consultations and consideration that led to this decision.</p> <p>Policy SD22 states that development will not normally be permitted outside of settlement boundaries. I do not see any exceptional circumstance to override that policy.</p>
Arun DC	HD1	<p>The use of the term “up to a maximum of 20 new dwellings” by imposing a ceiling or cap on total development does not have regard to national policy in which there is a presumption in favour of sustainable development. It is however understandable that those people preparing a neighbourhood plan will seek to estimate individual site capacities in order to appreciate whether or not provision will meet local need. Actual numbers of homes achieved on sites will be determined on a site by site basis when detailed schemes are prepared and assessed taking into consideration site constraints. It is therefore recommended that it be reworded as “Development proposals of a minimum of 20 new dwellings ...”</p>	<p>See above. ADC always make this statement as I advised the team. I was told you wished to keep the policy wording as is.</p>
Clapham PC	HD2	<p>HD2 - feel that the policy should be amended to include Clapham</p>	<p>This was in the original draft but removed in the latest. Add it back in.</p>

Consultee	Section	Response	FNDP Comment
David Hutchinson	HD2	<p>Policy HD2 implies that affordable housing will be delivered via Policy HD1, however SDNPA PO 2015 Policy 24 sets a target of 40% of new housing to be affordable with a starting threshold of 6 dwellings.</p> <p>Any proposals on allocated sites or windfall sites within the built up area of Findon are very likely to be for 5 dwellings or less because sites within the built up area boundary are essentially only large gardens and therefore will not be required to include any affordable housing or financial contribution in lieu of affordable housing.</p> <p>As it stands the FNDP is likely to be considered therefore not to be in conformity with the emerging SDNPA Local Plan strategic policies on affordable housing or the Local Plan objective that new housing in the National Park should focus on the provision of local connection affordable housing.</p>	See comment against HD1. It is an assumption that no sites capable of taking six or more units will come forward.

Consultee	Section	Response	FNDP Comment
SDNP	HD2	<p>HD2 - The current approach in HD1 is unlikely to deliver any affordable housing as sites within the settlement boundary will be too small to provide affordable housing. We consider that it is unlikely to be enforceable or deliverable.</p> <p>Recommend criteria(g) is a separate stand-alone policy regarding agricultural dwellings. Such a policy may not be necessary as it is already sufficiently covered by Local Plan policy. Any Local Connection policy should be in line with Arun DC's local connection criteria which in the draft Arun Local Plan states:</p> <p>The Local Planning Authority will base its assessment of identified housing need on the Housing Register and other available up-to-date housing needs assessments.</p> <p>Development will be considered to contribute towards meeting an identified need, where it will provide accommodation for any of the following:</p> <ul style="list-style-type: none"> • existing residents of the parish requiring separate accommodation; • persons who have long standing family links (immediate family only e.g. parent, sibling or adult child and step relationships) with the parish; • Grandparents, grandchildren, aunts or uncles and non-adult children will be included only where the District Council considers it necessary for the applicant to be accommodated within the Parish in order to provide or receive medical or social support to or from such a relative; • persons with full time employment based within the parish; • persons who have had to move away from the parish due to a lack of affordable housing, but would like to return; <p>Permission granted in these cases will be subject to a S106 agreement which includes safeguards that the scheme provides for the identified local need and will continue to do so in perpetuity.</p>	<p>This is not correct. Page 22 section PEC2 of the ADC Plan states that 75% of all vacancies in Findon will be allocated to those with a local connection.</p>
	HD2	<p>Does this accord with the SDNP strategic policy? This policy conflicts with ADC policy. ADC only has a local connection criterion for rural exception sites.</p>	

Consultee	Section	Response	FNDP Comment
Natural England	HD3	Policy HD3 rightly seeks to limit changes to the exterior of the building. Consideration should also be given to a range of factors including any possible use of the structure by protected species (notably bats), and the potential suburbanisation of individual and groups of suitable building because of features such as fencing, landscaping, parking and lighting.	See below
SDNP	HD3	HD3 - There will be development management policy in the SD Local Plan on this topic. Draft policy SD49 Conversion of Redundant Agricultural Buildings should be reviewed to see where FNDP policy can provide additional detail if necessary. HD3 should also contain criteria regarding the protection of landscape setting and any historic interest. Remote buildings with little infrastructure or access are not suitable for residential conversion.	Keep our policy but look if it needs additional text. Most of the issues are covered by the line 'and the emerging SDNPA Local Plan' as it is for the LPA to regulate the development, this Plan merely expresses support for enterprises.
Historic England	HD3	We suggest that Policy HD3 contain an additional caveat requiring the historic significance of farm complexes and individual buildings, including features or fabric of architectural or historic interest, to be retained.	Keep our policy but look if it needs additional text
Arun DC	HD3	This policy is very confusing and unwieldy. There are bits of text which are supporting within the policy. Suggest a re-write.	See above
SDNP	HD4	HD4 - It is not clear where this policy applies – within the settlement boundary or elsewhere? Caveats should be included to protect amenity and prevent against the loss of large areas of garden/green space. HD4.1 Type – use rather than using HD4.3 reads as policy criteria and should be included in the policy text rather than the supporting text	Look at how we can combine the text.
SDNP	HD5	HD5 - Policy refers to allocated sites, however there are none in the Plan. There is no clear definition of 'lowercost' housing. Affordable housing is unlikely to be deliverable as self-build.	Policy amended
SDNP	HD6	HD6 - this policy should be checked against existing permitted development rights. The policy approach may have unintended consequences on views and impacts on the landscape, particular where bungalows are on a hillside.	Existing PD rights cannot be taken into account as they are fact.

Consultee	Section	Response	FNDP Comment
Arun DC	HD6	What is the evidence to support this?	Large number of homes where a paddock attached to the home is located outside of the BUAB
SDNP	HD7	HD7 - This policy is poorly worded and does not provide clarity to the decision-maker as to what characteristics should be protected. We question the justification for the protection of such features. Is there any evidence to back the need to protect such features?	Add clarity to the supporting text
Arun DC	HD7	This is not a policy?	Add clarity to the supporting text
SDNP	HD8	HD8 - This policy would be more effective if the key points (style, design, materials) of the VDS are drawn into the policy text. Was the intention of the policy be that design should reflect the style of surrounding older traditional buildings rather than any surrounding buildings?	Policy amended
Historic England	HD8	We suggest that Policies BT1, BT3, BT8 CFW1, CFW3 and ES4 also contain a requirement that any impact on the historic environment is acceptable, or, alternatively, this protection could be afforded by a new single comprehensive policy or an expansion of Policy HD8 setting out various requirements for all new development, which should include conserving and enhancing designated and non-designated heritage assets.	Policy amended
Historic England	HD8	We welcome Policy HD8 (but see our comment above regarding a more comprehensive policy setting out requirements for new development).	Policy amended
SDNP	HD9	HD9 - We'd question how achievable these open space standards are when the FNDP seeks to restrict new housing within the settlement boundary where open space will be limited.	Is the SDNP suggesting that we should ignore good quality design because there is a lack of space for development?
David Hutchinson	Page 10	Page 10 - first para - An independent landscape character assessment of land parcels outside the boundary has been commissioned as part of the FNDP process and it is likely the Examiner will recommend that reference to this document is included in the FNDP when determining policy on the built up area boundary in relation to future housing need.	Add to evidence base

Consultee	Section	Response	FNDP Comment
SDNP	Page 10	<p>Page 10 - he paragraph on National Park policy protection for green space should be clarified, strictly speaking AONB and National Park status provide the same level of protection for the landscape and scenic beauty (NPPF para. 115). However, National Parks have additional protection in regards to wildlife and cultural heritage and the statutory National Park Purposes and Duty. See recommended revised text. It is incorrect to state that it is beyond the remit of the South Downs Local Plan to change settlement boundaries and the SDNPA has never said this to be the case. Where NDPs are being prepared, the Local Plan – preferred options has not reviewed the settlement boundary, however this does not preclude the Local Plan from doing so in the future. Indeed there may be a need to do so where the Local Plan is allocating sites to meet the requirements of policy SD23.</p> <p>Suggest - “It follows that since becoming part of the National Park such levels of protection remain shall be at an even high level and the FNDP’s own vision is in conformity with this enhanced level of protection. to green field areas outside the settlement boundary.</p>	Agree suggested change
SDNP	Page 10	Page 10 - Typo in first sentence, should read “Understanding Findon is the starting point...”	Corrected
SDNP	Page 10	Page 10-12 - Maps showing the development of Findon would be helpful here and would illustrate the growth of the village. In addition to Findon Park and Muntham Park , mention could be made of the parkland at Cissbury.	Added
Historic England	Page 10	At the top of page 10 the Plan indicates that becoming part of the National Park, protection from development will be at an even higher level. In fact, both AONBs and National Parks share the same level of protection in relation to landscape and scenic beauty (i.e. the highest status of protection).	See change from SDNP above
David Hutchinson	Page 12	Page 12 - It would be relevant to include here the analysis of new housing delivered in Findon over the last 15 year period, which shows that 75% of new houses were 4 or 5 bedroom houses.	Add to profile

Consultee	Section	Response	FNDP Comment
SDNP	Page 12	<p>Page 12 - Community Profile - We recommend that the statistics here could be better presented in graphs or figures. Comparison with West Sussex or the South East would be more relevant and would help the reader to better understand the issues/challenges which are unique to Findon. Comparison with the National Average is not particularly revealing. It would also improve the Plan to include an interpretation of these figures and how they have influenced the development of the FNDP and the future aspirations of the community. Currently they just appear as a series of figures.</p> <p>As a general comment, several statements are made throughout this section without a source or for example the survey which highlighted a particular issue (see also comments on Statement of Community Involvement).</p>	Not required elsewhere but we could add it
SDNP	Page 13	<p>Page 13 - Monarchs Way is a long distance path not a national trail.</p> <p>It would be helpful to include maps of key designations within the FNDP (possibly as appendices) rather than in the Evidence Base.</p> <p>3.3.7 Says that “the designation of a second conservation area centred on Nepcote is under consideration”. This is correct but it should be made clear that it is being so considered because the Neighbourhood Plan group asked for it to be so. In response to this request, work by the SDNPA on a Conservation Area for Nepcote has been prioritised. The FNDP should include a much clearer statement of support for the consideration being given to designating a Conservation Area for Nepcote.</p>	<p>Amend</p> <p>Happy to leave them in the Evidence Base as this will be a working document.</p>
SDNP	Page 20	Page 20 - This section should be updated with details of the South Downs Local Plan – preferred options.	Amend the last para to reflect the SDNP emerging plan.
David Hutchinson	Page 22	Page 22 - There are subtle and discreet methods of illuminating signs that would not cause any material light spillage while contributing to a welcoming ambiance in a village without street lights, so rather than a total ban on illuminated signs the policy should define either acceptable or unacceptable forms of lighting.	Do not agree. Residents were clear that they did not want illuminated signs and wish to maintain the dark sky status.
SDNP	Page 28	Page 28 - Have sites in the village for new play provision, allotments and a community orchard been identified? The FNDP should ideally show these on a map and include them in the list of infrastructure priorities for CIL.	Allotments are shown on Map 1. No new play provision has been identified in the Plan

Consultee	Section	Response	FNDP Comment
David Hutchinson	Page 4	Page 4 Consultation Statement	This cannot be completed until the Reg 14 responses are added. It will be submitted at Reg16 as the NPPF requires.
SDNP	Page 4	Page 4 - It would be helpful to include the full web address to the Findon NDP website (http://findon.arun.gov.uk/)	Amend
SDNP	Page 4	Page 4 Plan Preparation - The following section doesn't provide details of how the plan has been prepared. It would be helpful to include details such as when the Neighbourhood Area was designated (13 Sept 2012), how and when a steering group was established, membership of the steering group, subsequent engagement activity and evidence gathering – including details of any reports commissioned by the steering group and how these have informed the Plan.	Text amended
SDNP	Page 4	<p>Page 4-5 . This section would benefit from a new heading. The two statutory Purposes and Duty of the SDNPA should be provided in full:</p> <p>Give section on aims a clear heading.</p> <p>1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area</p> <p>State Purposes and Duty in full.</p> <p>2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The SDNPA also has a duty when carrying out the Purposes to: Seek to foster the economic and social well-being of local communities within the National Park.</p> <p>The Plan should acknowledge that there are limitations to what the NDP itself can achieve. For example the aims of plan regarding transport cannot be easily addressed by the NDP. These may be aspirations the Parish Council should seek to achieve though working with for example the Highways Authority.</p>	Don't agree. The Plan acknowledges support for the aims of the SDNP but the aims stated are those of the Parish.

Consultee	Section	Response	FNDP Comment
SDNP	Page 40	Page 40 - Dates should be given for evidence documents. Supporting evidence should be made available on the NDP website. Background documents – South Downs National Park Partnership Management Plan (2012). Remove repetition of Flood and Water Management Act. Also include South Downs Local Plan– Preferred Options and DEFRA Vision & Circular on English National Parks.	We cannot add documents that did not exist when we wrote the Plan or in the case of the DEFRA document which we did not use in our decision making.
David Hutchinson	Page 5	Page 5 -The Development 'aim' to ensure that future housing is within the built up area boundary to protect the agricultural land outside the boundary, although understandable, is not properly an 'aim', it is in effect a policy. The 'aim' should be more like 'review local housing need and the availability of sites within the built up area boundary to determine if future housing can be allocated without a review and extension of the current built up area boundary'	Agreed
SDNP	Page 6	Page 6 - This section should provide a summary of the community engagement undertaken in order to demonstrate how the FNDP has been developed to reflect the views of the community. How were the community involved e.g. surveys, workshops, face-to-face meetings etc and what were the issues identified by the community?	Don't agree. This is the purpose of the Consultation Statement.
SDNP	Page 7	Page 7 - The SDNPA became the LPA on the 1 April 2011 not 2012. The South Downs Local Plan will run from 2017 to 2032.	Amend
SDNP	Page 8	Page 8 - The second paragraph under 2.2.2 Local Planning Policy would appear to fit better under the previous heading National Guidance.	Amend
David Hutchinson	Page 9	Page 9 - As the SDNPA Preferred Options 2015 is now published and out to consultation the FNDP should consider including a list of strategic and management policies in the SDNPA document (effectively the draft or emerging Local Plan) that are of specific relevance to the FNDP in the same way that the saved Arun policies are listed, for example policies on dark skies, self build housing, conversion of redundant agricultural buildings, retention of retail frontages, retention of retail and commercial uses, housing and allocations (SD23), affordable housing provision including rural exception sites (SD24), with a caveat that these are draft policies.	This can be done but as the SDNP Plan has only just gone out to consultation and may well be changed it is felt better not to include reference to specific policy numbers.

Consultee	Section	Response	FNDP Comment
SDNP	Page 9	<p>Page 9 - The SDNP Local Plan – preferred options is open to consultation from the 2 September to 28 October 2015.</p> <p>The inclusion of the SDNP Vision is welcome. It would be helpful to elaborate on Findon’s role within the vision for the National Park. For example Findon is a thriving village, surrounded by open downs shaped by sheep grazing and is a village with strong cultural traditions still active today such as the sheep fair. Reference could also be made to the peaceful and tranquil places within the parish and the opportunities to enjoy these, for example via long-distance PRow including the Monarch’s Way.</p>	Don't agree. Not relevant as this section is about the SSNP vision. Details about the Parish are well covered in the Plan and the State of the Parish Report.
Historic England	Paragraph 58 NPPF	<p>Paragraph 58 of the National Planning Policy Framework states “...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.”</p> <p>Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. A characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. We promote the use of characterisation toolkits such as “Placecheck”, “Understanding Place” or the Oxford Toolkit, links to which can be found in the appendix to this letter.</p>	Add to the Evidence Base.
Highways England		No comments	
David Hutchinson		The FNDP also makes no reference to local housing need either from the Local Housing Needs Survey or the Arun Housing Register. The Examiner is likely to recommend that a summary of the Local Housing Needs Survey is included in the Evidence Base and reference made to identified local housing need in the FNDP.	Add to Evidence Base
David Hutchinson		The FNDP also makes no reference to rural exception sites as an approach to facilitate the provision of affordable housing on the outside edge of the built up area boundary, which the SDNPA Preferred Options 2015 includes as a key policy. Again the FNDP may be considered not to be in conformity with emerging Local Plan policies for rural exception sites.	This Plan cannot be expected to take into account policies in the SDNP Plan that were not available when the Plan went to Reg 14 consultation. In any event residents have clearly indicated that they do not wish to see housing outside of the defined BUAB.

Consultee	Section	Response	FNDP Comment
David Hutchinson		The FNDP does not include any proposals or policy to control the size of new houses within the built up area boundary. It is very likely that proposals to develop on the remaining larger gardens or redevelop small bungalow sites will continue will come forward with more 4 or 5 bedroom houses. Again this may be considered to not be in conformity with SDNPA Preferred Options 2015 which seeks to facilitate the delivery of smaller market houses and affordable houses to meet National Park housing need.	How can not having a policy prove to be not in conformity. If SDNPA has such policy it will prevail if such an application is submitted.
SDNP		Regulation 14, is the Pre-Submission Stage, not Submission.	It is a submission under Regulation 14 which is the Pre-Submission stage.
SDNP		The foreword and introduction repeatedly refer to the Plan giving local people a choice over where development will occur. However, the Plan itself does not make these decisions and instead defers the making of allocations to the SDNPA. The statements in the Foreword & Introduction are not consistent with policy HD1.	Do not agree. The Plan has given residents a choice over where development should be located. They have chosen not to allocate sites.
SDNP		In a number of places, when referring to Listed Buildings, Arabic numerals are used (1, 2) but they should be Roman numerals (I, II).	Amend
SDNP		The FNDP needs to have a timeframe, this is usually included on the front cover. We'd suggest aligning the FNDP timeframe with the South Downs Local Plan which is up to 2032.	The Plan indicates a 20 year period which would end in 2035.
SDNP		Reference to West Sussex Structure Plan is out of date, the higher lever policy for Findon is the saved policies of the 2003 Arun Local Plan and the NPPF.	Remove reference to the WSSP
SDNP		Furthermore, permission can still be given for development proposals within a settlement boundary. In conclusion we are concerned that this plan may, if progressed as currently drafted, will not be in conformity with the South Downs Local Plan and will quickly be superseded by the adoption of the South Downs Local Plan. Insufficient evidence has been presented to justify a departure from the emerging strategic approach. If this remains the case the SDNPA will have to consider allocating land in or around the village. This combined with the fact that many of the policies as presented appear to duplicate existing or emerging policies in the Arun Local Plan or South Downs Local Plan leaves open to question where the FNDP is adding value or a specific local flavour to what already exists. We are concerned that this will devalue the FNDP and will unfortunately limit its use.	See previous comments about the role of a NP

Consultee	Section	Response	FNDP Comment
Historic England		Finally, we consider that the preparation of the Neighbourhood Development Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by undertaking a historic characterisation survey as indicated above, inputting into the update of the list of Buildings of Local Character or undertaking a Conservation Area Character Assessment or Management Plan.	Agreed

The original copies of the responses can be found in the Evidence Base.

10. Conclusion

The publicity, engagement and consultation completed throughout the production of the Neighbourhood Plan has been effective, open and of high quality, with many opportunities provided for those that live, work, and do business within the Neighbourhood Area to feed into the process, make comment, and to raise issues and concerns.

All statutory requirements have been met and a significant level of additional consultation, engagement and research has been completed throughout the Neighbourhood Area.

This Consultation Statement has been produced to document the consultation and engagement process undertaken and is considered to comply with Part 5, Section 15 of the Neighbourhood Planning (General) Regulations, 2012.

