

Page number	Section	Comments	SDNPA Recommendation
Title		Findon Neighbourhood Development Plan, 2016 – 2035.	Query justification for the lengthy plan period (19 years) which goes beyond both the scope of the emerging South Downs Local Plan and the adopted Arun Local Plan.
7	I	This section should make clear that the policy context for Findon NDP currently also includes the saved policies of the Arun Local Plan 2003, which will in time be replaced by the South Downs Local Plan.	Include details of Arun Local Plan.
10	1.4	There is currently a pause in the SDNP Local Plan timetable, we recommend it would be better to state that the Local Plan will be submitted to the Secretary of State in due course.	Reword SDNP Local Plan timetable.
11	2.2	Repetition of text elsewhere covering the planning policy context.	Consolidate overview of planning policy context into one section.
12	2.2.4	This section should be updated with details of the Local Plan: Preferred Options which was published for consultation in September 2015.	Update with details of Local Plan: Preferred Options
13	2.2.4	Our Regulation 14 response still applies: “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.”	SDNPA will continue to consider whether a settlement boundary review is necessary in order to deliver the strategic aims of the Local Plan, this may include a change to the boundary in order to allocate land for housing where the NDP group is not doing so.
25	4.2	The Findon NDP contains ‘aims of the plan’ (pg.8) and ‘core objectives’ (pg.25). This could	Consolidate plan aims and core

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		create confusion in measuring the performance of the policies against the objectives of the Plan. We recommend the aims & objectives are consolidated into a single list.	objectives into a single list.
28	Policy BT2	Retention of employment land Employment uses are generally considered to be B1, B2 and B8 uses. There is no planning definition of 'trade-use'. Wording of this policy needs to be clarified to provide certainty for the decision maker. The second part of the policy concerns residential development and perceived impacts on established businesses. Is there evidence of this occurring in Findon? Normally the consideration of any site suitability would take into account neighbouring land uses. This sentence appears unnecessary.	Remove reference to 'trade use' in the policy text. Delete second sentence.
29	Policy BT4	Retention of retail frontages Window displays are not within the remit of planning control. However, the design of a shop frontage is.	Remove 'display' from the last sentence of this policy.
30	Policy BT6	Shopfront and business signage Policy implies all illuminated signs will be resisted. However, there may be circumstances where an illuminated sign is appropriate (e.g. pub signage, see page 68).	Revise wording to allow for appropriate and sensitive sign illumination in certain locations and circumstances. Alternatively remove policy and leave to the Local Plan to lead on considering the limited likelihood of such proposals.

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30	Policy BT7	Improving signage Small signs are unlikely to require planning permission. The policy should be clarified to either only apply where planning permission is required or be removed and set as a community aspiration.	Clarify policy or set as community aspiration.
31	Policy BT10	Home Working The second criteria of this policy would benefit from clarification that adequate parking is required for the increase in visitor numbers and that parking could be made available onsite or the vicinity of the site.	Clarify policy wording.
31	Policy BT11	Redundant Agricultural and Rural Buildings It's not possible to require proposals to meet emerging policy. What is the justification for not allowing conversion to residential uses but allowing short term holiday lets? Reference to small groups of houses within a cluster of farm buildings is unnecessary as should be covered by policy HD1 – Spatial Plan of the Parish	Remove reference to emerging SDNPA Local Plan at end of 2nd sentence. Provide justification for policy approach. Remove last sentence.
33	Policy GA1 and GA2	The inclusion of criteria relating to footpaths in both policies may be confusing.	Remove 3 rd bullet from policy GA1, text in GA2 in relation to footpaths be retained.
34	Policy GA4	A24 improvements The improvements sought to the A24 are not under planning control, this should be identified as a community aspiration / project or equivalent. Reference could also to made	Re-label as non land use policy. Include reference to support for equestrian crossing.

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		in this project to equestrian crossing points.	
37	Policy CFW5	Assets of community value Generally support the policy approach towards Assets of Community Value, although we are concerned that community facilities not registered as ACV are not referenced.	Extend policy to other community uses not registered as ACV or make reference to protection offered to such facilities in existing Local Plan.
38	Policy CFW6	Local Green Space Policy could be clarified by rewording as follows: The Parish Council has designated The areas shown in Appendix 2 and accompanying map are designated as Local Green Space. Proposals for development of these areas will not be permitted except in special circumstances. Exceptions will only be made: • where the benefits of development can be shown to outweigh any identified harm; • there are no reasonable alternative sites available; • 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. (covered by NPPF para 76) We would question the inclusion of some of the proposed Local Green Spaces in Appendix 2, in particular the ‘open areas at village entrances’ which are essentially grass verges. It is	Clarify policy wording. Remove grass verges and footpaths from LGS designation.

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		difficult to see how these are demonstrably special. Also we do not believe the Local Green Space designation is intended for footpaths (PRoW or private footpaths). We are concerned that the designation of such areas undermines the strength of LGS policies and will set an unhelpful precedence.	
38	Policy CFW8	Unlit village status ‘Unlit village’ status is not a recognised SDNP designation. It is unclear where this status comes from. Reference should instead be made to Dark Night Skies, which is one of the Special Qualities of the SDNP.	Re-title policy ‘Dark Night Skies’.
39	Policy ES1	Gaps between Settlements Remove reference to the Arun Local Plan 2003 which in time will be superseded by the SDNP Local Plan. To future-proof this approach to Local Gaps the Findon NDP should identify the area to be protected and provide justification for its protection. This work should be supported by landscape character analysis.	Remove reference to Arun Local Plan 2003 designation. Review the gap and provide justification for its designation.
39	Policy ES2	Surface water management Policy ES2 is poorly constructed and it is recommended that this policy be redrafted or removed from the NDP. As an example, conditioning new development to provide details of drainage is misplaced. A full sustainable drainage strategy for new developments of 10 or more homes should be sought from the outset, preferably at pre-application but it must at the very least accompany the planning application. While we can encourage use of permeable paving or other porous surfaces for driveways, there is no statutory basis for these to be mandated (except for major developments as part of a SuDS).	Redraft or remove policy from NDP.
40	Policy ES3	Protection of Trees and hedgerows	Clarify policy wording

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		Tree Preservation Orders are issued by the LPA, remove reference to 'Findon' TPO in the 1st sentence. Remove reference to ancient trees in the second sentence, these are covered by the above category.	
41	Policy ES4	Renewable Energy It is unclear what is meant by 'low to serve individual properties'	Clarify policy wording.
42	Policy ES5	Buildings or Structures of Special Character ADC SPD 2005 criteria differs from those established by the SDNPA for its own Local List. There is, therefore, the potential for a park-wide Local List with one set of criteria and a separate Local List for Findon with its own. This situation is potentially confusing and undesirable. If the Parish Council wants to embed the existing list in the Neighbourhood Plan, it would be better if the buildings were reassessed against the National Park's criteria. This may also provide the opportunity to incorporate further properties or buildings.	Assess buildings against SDNP Local List criteria for inclusion in the NDP.
42	Policy ES6	Conservation Areas and Areas of Special Character Areas of Special Character are not being carried forward in the emerging South Downs Local Plan. This designation will quickly become out of date. It is also not clear where the ASC are – there is no map included in the NDP. The second sentence is not a planning policy.	Remove reference to Areas of Special Character and second sentence of policy.
42	Policy ES7	Flint walls Policy wording should be clarified as follows:	Clarify policy wording. Remove last sentence.

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		“Development proposals that seek to <u>result in the</u> removal, <u>reduction</u> or <u>replacement</u>, the flint walls listed in Appendix 4 will not normally be supported.” Wall repairs are unlikely to require planning permission.	
43	Policy HD I	Spatial plan of the Parish – our Reg 14 comments still apply: The SDNPA has a number of concerns about this policy and does not consider it to be in line with emerging SDNP Local Plan policy. The emerging SDNPA Strategic Policy SD23 states that sites will be allocated (rather than relying on windfalls) to allow for the delivery of approximately 20 homes in Findon. This may require a change to the settlement boundary if sufficient sites cannot be found in the settlement. HDI as currently worded will quickly be superseded by the adoption of the South Downs Local Plan. In addition, the SDNPA will continue to consider allocating land in or around the village as insufficient evidence has been presented that land cannot be allocated without harm to the landscape character. In response to a letter from Findon Parish Council regarding the housing figure being proposed for the community the SDNPA made the following points: The SHLAA is just one element (albeit a very important element) of the evidence used in order to provide a provisional housing requirement both for the whole National Park and individual settlements as part of the preparation of the Local Plan. Information on the level of services and facilities a community might contain and its connectivity with other larger centres also forms part of the assessment. In this regard Findon is felt to be a relatively sustainable settlement in comparison to others within the National Park with potential to accommodate more housing than might be the case elsewhere without harming the special qualities of the National Park, particularly landscape.	Delete or reconsider spatial strategy.

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		However, further evidence will be required to support the Local Plan and Neighbourhood Plans to demonstrate that the levels of growth proposed are deliverable. It will therefore be recognised in the Preferred Option Local Plan that the final requirements set out in the housing policy may change. In response to concerns about one particular site identified in the SHLAA the proposed level of allocations for the village was reduced from 50 to in the region of 20 homes and we asked that information on the sites being considered by the Parish were shared with Officers at the National Park. It is therefore disappointing to see that this policy approach remains and that the Neighbourhood Plan backs away from making the key and difficult decisions and indeed then attempts to constrain what approach the LPA can take in the future. In addition to this no review of the settlement boundary has taken place. In addition there is concern that the site assessment process is inconsistent and unclear. This was an issue that has very recently led to the examiner of the Storrington, Sullington and Washington NDP finding that that plan cannot be progressed to referendum.'	
44	Policy HD2	Local Connection 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.	
45	HD3.3	It is not clear why a work unit should be no greater than 3.6m high, further justification should be provided.	
45	HD4	Self build houses	Remove.

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		Reiterates national policy	
46	HD5.I	It is not clear whether the detailed design of roof alterations and extension relates to local character, further justification should be provided.	Design of roof alterations and extensions should relate to local character.
46	HD6	Edge of Boundary Houses and Paddocks It is not clear what the ‘inter relationship’ that is to be protected and encouraged is. The purpose of the policy appears to be retain exclusive paddocks use on the edge of the settlement boundary and it might be felt that this is to prevent the consideration of such land for housing allocations. It is questionable whether this is such a key characteristic of the village that it should for ever be retained and in some places rather than a collection of lightly fenced enclosures there appears to be heavy duty fencing and concrete structures (albeit this may not specifically be in relation to paddocks).	Review or remove policy.
47	HD7	Design of development The policy heavily relies on the Findon Village Design Statement for design guidance which doesn’t carry much weight. As previously commented it would be better to add more detailed design policy in the NDP. The policy should also make clear whether contemporary design is or isn’t supported. There is confusion between the policy wording (must seek to reflect the design style of older traditional surrounding buildings’) and 5.7 Housing and Design Quality Objective 3 which states: ‘Encourage high quality design in local vernacular, contemporary and rural forms and materials;	Provide more detailed design guidance in the NDP. Clarify policy wording.