

02 July 2015

Ms. Sally Morris  
South House  
The Street  
Clapham  
Worthing  
West Sussex  
BN13 3UU

Dear Ms. Morris

Subject: South Downs National Park Authority (SDNPA) response to the Pre Submission version of the Clapham Neighbourhood Development Plan

I enclose a copy of the SDNPA representation on the Pre Submission version of the Clapham Neighbourhood Development Plan (CNDP). These comments are from officers at SDNPA, the comments have not been to any committee for Member approval.

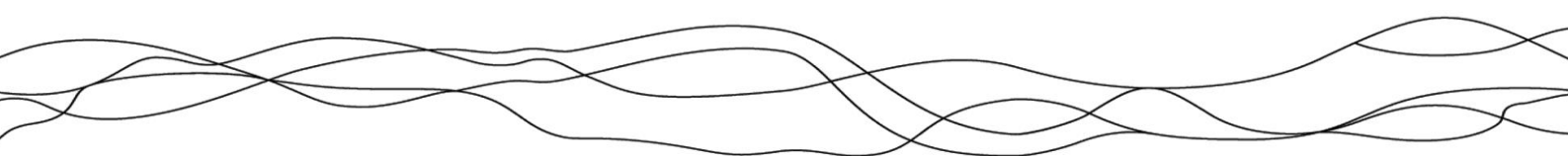
The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Clapham Parish Council in the preparation of the CNDP. Localism and planning in a protected landscape is challenging, as the group have to balance the aspirations of residents and visitors with the challenge of conserving and enhancing the special qualities of the South Downs National Park. In particular the SDNPA welcomes the ambition of the plan to allocate land for housing to meet some of the identified need in the local community. Providing housing for local people is critical in National Parks and the group should be commended for their efforts.

In summary the SDNPA believes that the minor modifications proposed in the attached representation will ensure the CNDP will be in a position to move towards the Submission stage of Neighbourhood Planning. The CNDP does require further work to provide robust justification and evidence to support the policies set out in the CNDP. In addition the SDNPA representation sets out a number of general comments relating to the entire CNDP. There are also a number of comments relating to specific policies in the CNDP. These points or minor amendments will strengthen the policies contained in the CNDP and ensure a robust plan for the Parish of Clapham.

If you have any questions regarding our enclosed representation please do not hesitate to contact Communities Lead Chris Paterson who will be able to provide further clarification if necessary.

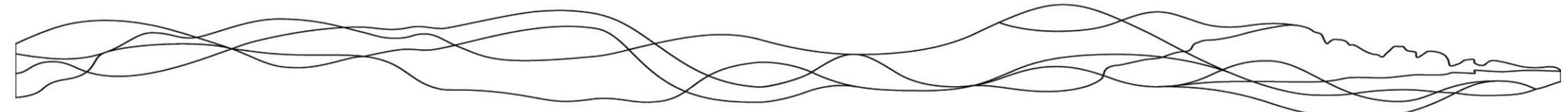
Yours Sincerely

Tim Slaney  
Director of Planning

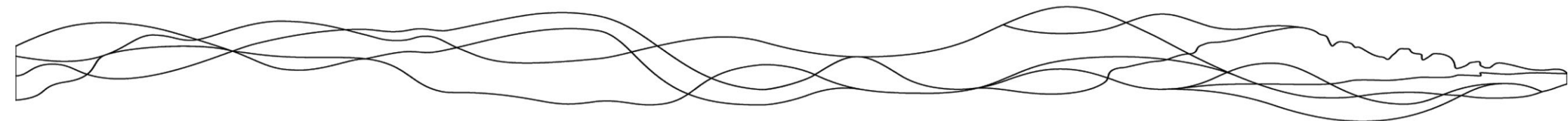


## SDNPA response to the pre submission draft Clapham Neighbourhood Development Plan

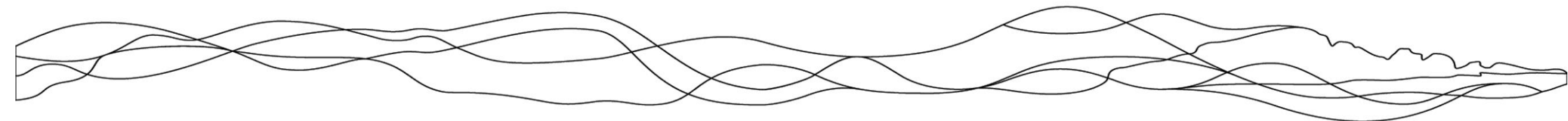
Ref	Comment	SDNPA Recommendation to Clapham Parish Council
I	<b>General Comment</b>	
I.1	The progression of the Clapham Neighbourhood Development Plan (CNDP) to pre-submission stage is to be welcomed and is a result of a considerable amount of hard work by the parish council and volunteers. We recognise that preparing the CNDP has been a challenge at a time when adopted Local Plan policy is largely out of date (Arun District Local Plan 2003) and draft policies for the SDNP Local Plan have been emerging. Also the absence of precedent NDPs in the National Park has understandably made your task more challenging. We also appreciate that the draft has been prepared with a limited budget to undertake any of the work. The resulting draft, therefore presents a considerable achievement of the Parish Council, steering group and other volunteers.	
I.2	Repetition – Elements of the plan are repeated on a number of occasions e.g. hard standing in front of Coach and Horses not being within the CNDP area. The Plan should be commended on its concise and generally clear nature but removing some of this extra detail would be of assistance to the reader.	Review CNDP and remove repeated text.
I.3	To navigate the document, it would help to have all paragraphs numbered. Paragraph numbers allow individuals to reference the relevant part of the plan without the need to repeat text from a particular section. This will also assist greatly when it comes to submitting the plan for Examination.	Add paragraph numbers.
I.4	The NDP would benefit from greater recognition of the National Park and the role that Clapham can play in supporting the purpose and duties of a National Park Authority. References are generally limited to linkages and footpaths rather than the wider purposes of conserving and enhancing natural beauty, wildlife and cultural heritage – See Vision Statement Section 4.1	Review content of CNDP in light of established protection for National Parks (Environment Act 1995) and the DEFRA Vision and Circular for English National Parks and Broads (2010).
I.5	There is a need for greater clarity over where policies do and do not apply within the Parish. There is no defined village boundary and therefore it is not always clear.	Review policies to ensure it is clear as to whether they apply throughout the entire parish or just in parts.
I.6	It is recognised that a distinction has been made between the planning policies and other elements of the plan through the use of bold text and numbering. However, the independent examiner at the recent Petersfield NDP public hearing has indicated that community aspirations should be in an appendix in order to ensure that the land use policies are clearly identified. We would recommend that you follow this approach.	Move any community aspirations into a separate appendix. Review all policies to ensure that they are land use related E.g. GA1 – Existing community transport will be preserved and, where appropriate, be enhanced as demand



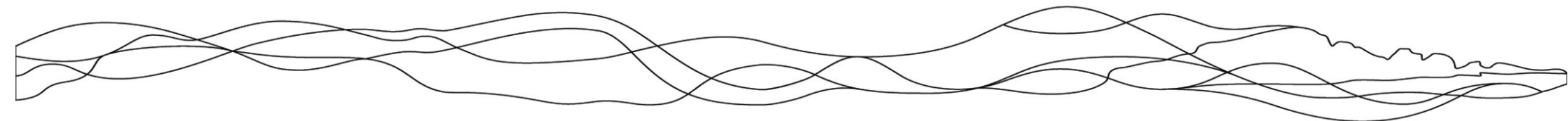
		increases. This policy is not a land use policy and therefore should be moved to an appendix
<b>2</b>	<b>Section 1 - Introduction</b>	
2.1	Section 1 (2 <sup>nd</sup> para) NPPF – should not be shortened in the first instance – National Planning Policy Framework	Typo correction
2.2	Section 1 (2 <sup>nd</sup> para) ADC – should not be shortened in first instance – Arun District Local Plan	Typo correction
2.3	Section 1 (6 <sup>th</sup> para) - The wording of this paragraph suggests that Regulation 14 has taken place, when in fact it is the current stage of the plan preparation.	Ensure next iteration of plan is clear
2.4	Section 1.4 (1 <sup>st</sup> para) – should state that the SDNPA has confirmed that a strategic environmental assessment IS required	Typo correction
2.5	Section 1.4 (2 <sup>nd</sup> para) Should caveat the sentence with reference to the need for a referendum before plan comes into effect.	Typo correction
2.6	Section 1.4 (5 <sup>th</sup> para) The SDNPA Local Plan will run to 2032.	Add additional text for clarity
<b>3</b>	<b>Section 2 - Context</b>	
3.1	Section 2.2.2 (4 <sup>th</sup> para) suggest additional text at end of paragraph ‘... and has been mindful of the emerging Local plan being prepared by the SDNPA’.	Add additional text for clarity.
3.2	Section 2.2.4 (4 <sup>th</sup> para) separate out text with paragraphs to make vision more reader friendly.	Ensure next iteration of plan is clear
3.3	Section 2.2.4 (5 <sup>th</sup> para) states that the options consultation contained no policy options that indicated any change in Clapham. Although there are no specific references to Clapham in the options consultation many of the proposed options would have potential impact on Clapham. This appears to be at odds with the purposes of preparing a NDP and requires clarification.	Minor layout change
<b>4</b>	<b>Section 3 – About Clapham</b>	
4.1	Section 3 – Consider there would be value is setting out the proximity to Worthing and other more major service centres to better reflect the context that Clapham sits within. Inclusion of maps and diagrams throughout the document would reduce the level of text needed and improve general readability, especially for those who are not familiar with Clapham Parish.	Revise wording. Consider the addition of maps / diagrams throughout the document
4.2	Section 3.1 History of the Parish of Clapham – The detailed history of the Church is not of particular relevance as there are no land use policies emanating from this information and evidence.	Consider removing this information or moving it to a separate appendix supporting the CNDP.
4.3	Section 3.2 Key Statistic – 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 Clapham. Comparison with the National Average may not be particularly revealing. It would also improve the	Review text and add further interpretation of the statistics and how this influences the content of the CNDP



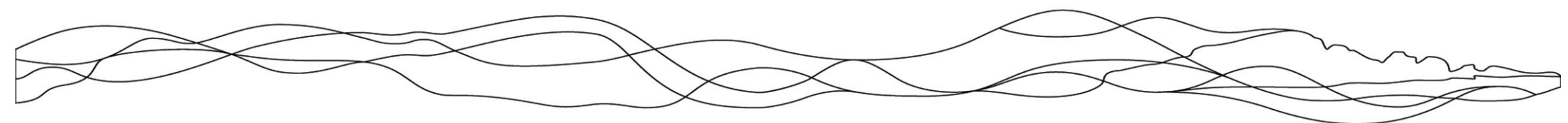
	Plan to include an interpretation of these figures and how they have influenced the development of the CNDP and the future aspirations of the community. Currently they just appear as a series of figures.	
4.4	Section 3.4.6 Street Lighting - Clapham is <u>officially</u> registered as an unlit village. Further clarification and information is required to establish what this classification means and whether this will have impact on future planning applications. It should also be determined who is responsible for this classification	Clarification within text.
5	<b>Section 4 - Vision and Core Objectives</b>	
5.1	Section 4.2 (3 <sup>rd</sup> bullet) – albeit that this is an objective – infrastructure to meet the needs of all of the community is an unobtainable objective and may benefit from being refined. Is there a particular part of the community whose needs are not met and what would be required to do this?	Revise wording
6	<b>Section 5 - Neighbourhood Plan Policies</b>	
6.1	Section 5.2 It would appear that this is a policy, but this is not clear. If this is a policy it should have a policy reference like all other policies in the CNDP	Clarification as to whether this is or is not a policy.
6.2	Policy GA1 Connection to Sustainable transport The final sentence 'Existing community transport will be preserved and, where appropriate, be enhanced as demand increases' is not a land use policy, therefore this sentence should be moved to the supporting text at GA1.3 or removed to an aspirational policy in an appendix	Amend or remove policy wording as suggested
6.3	Policy GA2 Footpath and Cycle path network The following text is not relevant to land use matters and therefore not appropriate to be included in this land use policy 'while also supporting the prevention of improper use of existing footpaths'	Revise wording
6.4	Policy GA3 Safe Walk to School routes Clarification is needed, are the bus stops for secondary school pupils only? What exactly does 'resisting access to Clapham School by car' mean and how would this be used in the determination of a planning application? Is this a land use policy or could this policy be included as an aspirational policy in an appendix.  The following rewording of policy GA3 is also proposed:  Working with the local schools and the Highway Authority school travel plans will be reviewed/developed and promoted. Safer routes to the school and school bus stops will be identified as part of these plans and the necessary improvements or additions will be provided, including resisting access to Clapham school by car. Measures, <u>to include traffic calming, to ensure appropriate traffic speeds are achieved as part of overall schemes that fit within the landscape of the SDNP and improve cycling and walking opportunities for students and their families</u> that seek to ensure	Provide further clarification regarding current policy wording. Consider moving policy to an appendix



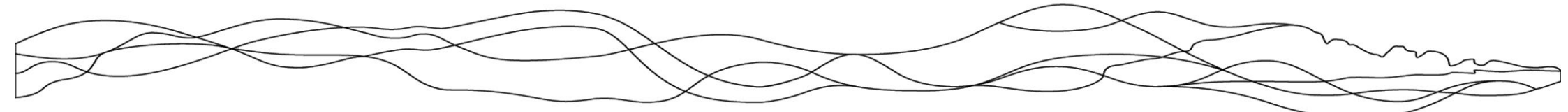
	<del>appropriate traffic speeds without unnecessarily increasing signage throughout the Parish will be supported.</del>	
6.5	Policy BT1 Support for Business See emerging SDNP Local Plan policy SD28: Employment Land. It may be that this policy is unnecessary given the emerging SDNP Local Plan policy. The policy could be clarified by the identification of the employment sites on a map if this is feasible.	Review policy in light of emerging Local Plan policy.
6.6	Policy BT3 Support for new commercial uses The sites referred to would benefit from a reference number. The policy as written which allows for the use of one or the other piece of land does not 'provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency' (NPPF para 17) and is therefore not fit for purpose.	Review policy wording. See guidance on policy writing available at <a href="http://mycommunity.org.uk/resources/neighbourhood-planning-how-to-write-planning-policies/">http://mycommunity.org.uk/resources/neighbourhood-planning-how-to-write-planning-policies/</a>
6.7	Policy BT4 The Village Shop / Café The policy seems to imply that the change of use of the shop would be supported. Is this the intended outcome? There is an identified need for homes in the village, would this meet the requirements of the policy and therefore result in the loss of the shop? If the shop is such a key asset it would be more appropriate to start the policy with, 'Loss of the village shop will not be supported, however any proposals to extend....'. and so on. Please also see emerging SDNP Local Plan policy SD50: Shops outside centres.	Review policy in light of emerging Local Plan policies and see guidance on policy writing available at <a href="http://mycommunity.org.uk/resources/neighbourhood-planning-how-to-write-planning-policies/">http://mycommunity.org.uk/resources/neighbourhood-planning-how-to-write-planning-policies/</a>
6.8	Policy BT6 Recreational and Tourism Activities See emerging SDNP Local Plan policy SD20: Sustainable Tourism and the Visitor Economy. It may be that this policy is unnecessary or conflicts with emerging SDNP Local Plan Policy. There is a need to ensure that all development supports the duty and purposes of the National Park and it may be appropriate to reference this at the end of the policy wording	Review policy and consider emerging Local Plan policy SD20.
6.9	Policy BT7 Rural Buildings See emerging SDNP Local Plan policy SD48: Conversion of Agricultural Buildings. It may be that this policy is unnecessary or conflicts with emerging SDNP Local Plan Policy SD48.	Review policy and consider emerging Local Plan policy SD48.
6.10	Policy BT9 Sustainable Commercial Buildings There have been a series of recent changes to legislation relating to renewable and low carbon energy and local parking standards. See ministerial statement 23 March 2015 - "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."  See ministerial statement 25 March 2015 – "Neighbourhood plans should not be used to	Review policy in light of emerging Local Plan Policy and National Legislation.



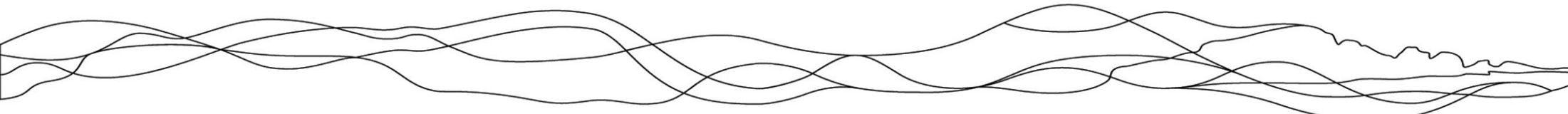
	<p>apply the new national technical standards”</p> <p><a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a></p> <p>Draft policy SD55 Renewable Energy of the emerging SDNP Local Plan should be reviewed to see if the Clapham NDP can add detail.</p>	
6.11	<p>CFW1 Support Independent Living</p> <p>Should such accommodation be supported throughout the Parish or would more central locations where there is at least some access to facilities be more appropriate? See point 1.5 above reference to where the CNDP policies apply.</p>	<p>Review policies to ensure it is clear as to whether they apply throughout the entire parish or just in parts.</p>
6.12	<p>CFW3 – Assets of Community Value:</p> <p>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 CFW3.</p> <p>A building or piece of land will be deemed to have community value only if:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• This use (as described above) of the building will continue to further the social wellbeing or interests of the local community.</li> <li>• 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.</li> </ul> <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 identified. 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>Review policy wording. Make it clear whether it is the intention of the Parish Council or other community group to seek to register these properties and clarify whether this is indeed appropriate. Have the relevant authorities / landowners been consulted. Currently as drafted the policy could conflict with any such registration.</p>



6.13	<p>CFW4 Local Green Spaces. Experience at the recent Petersfield NDP Examination highlights the need to evidence how these sites have been selected and justify how they meet the requirements as set out in the NPPF paragraph 77. What do they add to the existing level of protection? How are they demonstrably special? Use of the term 'special' within the policy is unclear, suggest the term 'exceptional' may be more appropriate.</p>	<p>Review designation in light of the criteria in the NPPF para 77, ensure evidence is available to support such proposals. Ensure policy CFW4 reflects national guidance.</p>
6.14	<p>HD1 Grade 1, 2 and 3a Agricultural Land Where is this land within the Parish?</p>	<p>Provide map to support policy.</p>
6.15	<p>HD3 Housing mix The ability to seek a mix of homes will depend on the size of the site and may not always be possible.</p> <p>The planning system can not restrict the letting of homes and indeed homes for rent unless they are social housing. Where is the evidence to suggest that this is an issue in the Parish?</p> <p>There is a need to ensure that this policy is compatible with the emerging SDNP Local Plan policy SD24: Affordable Housing Provision</p>	<p>Review policy in light of emerging Local Plan Policy and comments made.</p>
6.16	<p>HD4 Housing density</p> <p>Where is the evidence to support a density of 24dph. What if the homes are to be flats, which might meet the needs of a number of people in the community?</p> <p>The emerging SDNP Local Plan policy on affordable housing (SD24) seeks a minimum, rather than maximum, of 40% affordable housing so it would appear that this policy conflicts. The need to set an affordable housing requirement may be negated by the preparation of the SDNP Local Plan, so there is a need to consider whether there is anything that can be added by the CNDP, or will these be merely repetition.</p>	<p>Review policy in light of emerging SDNP Local Plan Policy and comments made. Consider the need for further evidence to support the policies.</p>
6.17	<p>HD5 Housing site allocation The sites referred to would benefit from a reference number and a clearer OS map so that the sites can be viewed clearly by someone who is not familiar with Clapham Parish.</p> <p>The SDNPA welcomes the ambition of the plan to allocate land for housing in order to meet some of the identified need in the community. This is one of the main reasons a community might wish to prepare a NDP. However, the policy as written which allows for the use of one or the other piece of land does not 'provide a practical framework within which decisions on planning applications can be</p>	<p>Provide clear OS map to provide clarification on site location</p> <p>Review policy in light of emerging South Downs Local Plan policies and see guidance on policy writing available at <a href="http://mycommunity.org.uk/resources/n">http://mycommunity.org.uk/resources/n</a></p>

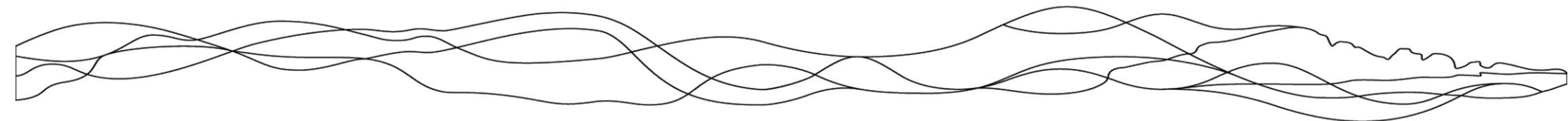


	<p>made with a high degree of predictability and efficiency' (NPPF para 17) and is therefore not fit for purpose. The delivery of land for housing needs to have some degree of certainty for landowner and community. As written it implies that a race might take place between competing landowners and the first one to gain permission will stop the other site being considered further. This is not an appropriate way to manage the delivery of sites. There is a need to assess the suitability, need for such development and the likely deliverability of the sites and to formulate your allocation of the land based on that robust, proportionate information.</p> <p>HD5.1 Experience from the Petersfield Neighbourhood Development Plan Examination shows the importance of understanding the current status of sites and their deliverability over the plan period. What information do you have to support the allocation of these two sites? Is there any realistic possibility that the builders merchant will move to a new location? The CNDP will need to demonstrate that any allocated sites are suitable, available and achievable before they can be allocated, as per reference in NPPF footnote 11.</p> <p>It is likely that a new housing development will provide a CIL receipt. As the redevelopment of the former BMX site is not a requirement based solely upon the extra burden that this new development would place on the village it would appear unlikely that such a scheme could be entirely funded through this means, albeit that some of the CIL receipt gained might go towards it. To require a developer to fund it entirely may be unreasonable and place the viability of their development into question.</p> <p>The remainder of the policy is unclear. It may not be in the gift of the developer to provide a community development on the existing shop / café land as it is not within their ownership. Indeed how this would work with the existing uses on the land and what type of community facility are you seeking. Where is the alternative safe access to the site, are there any constraints on alternative safe access to the site?</p> <p>HD5.2 – Reference to 'seeking to bring this site forward' but the policy has not specified one site, it has identified one site or another. There is a need to demonstrate which site is going to be allocated for housing, based on robust evidence, including the potential constraints on the sites.</p>	<p><a href="#">neighbourhood-planning-how-to-write-planning-policies/</a> Consider the need for further evidence.</p> <p>Clarify intention of policy.</p> <p>Clarify intention of policy.</p> <p>Clarify intention of policy.</p>
6.17	<p>HD5 &amp; Proposals Map The proposals map included in the Clapham Neighbourhood Plan would appear to include part of the former landfill in the area outlined for housing/business start up units. The extent of the former</p>	<p>It is recommended that Arun District Council Environmental Health department is consulted with regards to</p>

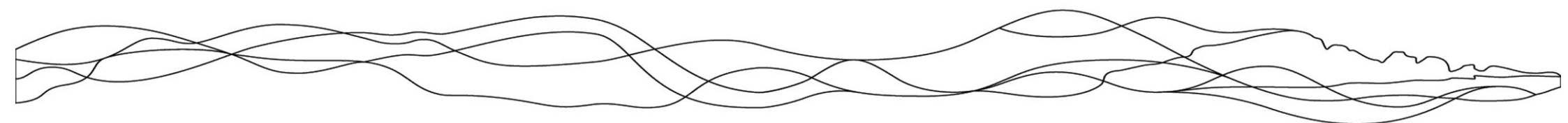




	<p>landfill can be viewed on the Environment Agency's website <a href="#">What is in my backyard?</a></p> <p>The EA's map may be a 'broad-brush' approach to identifying former landfill sites, however the extent of the former landfill at Clapham should be determined as early as possible in order to ensure the relevant bodies can be consulted.</p>	<p>the extent of the former landfill site and its suitability for inclusion in any part in the Proposals Map.</p>
6.18	<p>HD6 Windfall sites</p> <p>Where does this policy apply? Throughout the entire parish or only within parts of the core village. What do you mean by infill – is it land to the rear of the property of gaps within built frontages? Do any such places exist?</p> <p>HD6 points:</p> <p>v) Repeats the affordable housing policy which itself may not be needed.</p> <p>viii) No settlement boundary has been defined so where does this apply. Should you consider defining a settlement boundary?</p>	<p>Consider the identification of a village boundary in order to more clearly define where this policy applies.</p>
6.19	<p>HD8 – Attention to detail</p> <p>Bullet point 5 (lighting schemes) - Consider the emerging SDNP Local Plan policy SD9: Dark Night Skies.</p>	<p>Review policy in light of emerging Local Plan Policy.</p>
6.20	<p>HD9 – Local Connection</p> <p>This policy needs to be reviewed in light of any allocations policy that Arun District Council operates and their response is required. If these homes are affordable houses, then they will be allocated to those on the housing register by Arun District Council in consultation with the housing provider and potentially the Parish Council (dependent on the protocols in your area).</p> <p>These homes are not available for purchase in the first instance.</p> <p>As written it is likely that this policy is inappropriate and much falls outside of the remit of planning and the CNDP.</p>	<p>Need to review content of this policy with input from Housing Officers at Arun District Council.</p> <p>Is the policy necessary?</p>
6.21	<p>HD10 – Car Parking</p> <p>This policy may be in conflict with the Ministerial Statement of the 25<sup>th</sup> March which related to the need to ensure there is adequate parking provision both in new residential developments and around</p>	<p>Review policy in light of Ministerial Statement.</p>



	<p>town centres <a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a>. 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.</p> <p>Could the policy be better worded to ensure that new development consumes its parking requirements on-site so as not to add to the existing congested roads, unless evidence can be presented by the applicant that sufficient on-street parking is available.</p>	
6.22	<p>HD12 Clapham and Patching School What evidence is there that the school may close in the life of the plan? The school premises have been identified in the Plan as a community asset which then conflicts with the suggested conversion to sheltered / assisted living accommodation etc.</p>	Seek further evidence and address conflicts between protecting community assets and Policy HD12.
6.23	<p>ES1 Surface water management Policy ES1 is considered fit for purpose providing the paragraph at second bullet point is amended as follows:</p> <p>Consideration should be given to the use of Sustainable Urban Drainage Systems (SUDS) as alternative to conventional drainage where appropriate, but not where the winter water table is less than 0.7 of a meter below ground level. Sustainable drainage systems on private property, whether they are private or adopted, must be approved by the relevant SUDS Approval Body (SAB) SDNPA prior to the commencement of development and conform to the recommendations of the SUDS Manual produced by CIRIA. All approved sustainable drainage systems shall be recorded on the flood risk register.</p>	Revise wording
6.24	<p>ES2.3 – The planning system has little role to play in the change of use of land from woodland to another agricultural use, unless the trees are covered by a Tree Preservation Order. However, there may be a need for a felling license which is obtained through the Forestry Commission.</p>	Review information on Forestry Commission website and consider removing section ES2.3 from the CNDP.
6.25	<p>ES5 – Conservation Area.</p> <p>New areas identified for Conservation Area status should be presented to SDNPA Conservation Officers at the earliest possible opportunity to ensure these can be considered as part of the CNDP development</p>	<p>Review policy in light of emerging Local Plan Policy SD38: Conservation areas.</p> <p>Provide details of proposed Conservation Areas to SDNPA at earliest convenience</p>
6.26	<p>ES6 Open Access and Permissive Paths</p>	Suggest removing Policy ES6 or moving



	As currently stated Policy ES6 is not a land use planning policy and is therefore not appropriate to be included in the CNDP. It is suggested that this aspirational policy could be moved to an appendix.	the policy to an appendix for non land use policies
6.27	ES7 Unlit Village status 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 SD8: Dark Night Skies	Review policy in light of emerging Local Plan Policy SD9: Dark Night Skies
7	<b>Strategic Environmental Assessment (SEA)</b>	
7.1	<p>SDNPA agrees that the proposed housing for Clapham may increase the viability or retention of the primary school. This is a point that the SEA makes in paragraph 6.2:</p> <p><i>It has selected the housing numbers and type of business units to minimise the impact on the existing village, whilst recognising the critical part the modest number of additional households, together with the employees in the light industrial site, can play in ensuring the survival of existing village facilities, such as the school, shop/café and church.</i></p> <p>It is considered that the SEA could do more to bring this out in the assessment. For example, should the Community Facilities column in Table B show a '+' for 'Social'?</p> <p>In Table C, would it be appropriate to show a '-' for 'Social' in the 'No Policy' column?</p> <p><i>In relation to consideration of Reasonable Alternatives to the proposed plan SDNPA considers that the statement in paragraph 10.5: The SHLAA prepared by SDNP does not identify any land within the Parish as suitable for housing provides sufficient basis for having considered reasonable alternatives.</i></p> <p><i>Furthermore, it is conceded that: Not delivering homes for local people would be unlikely to secure a successful referendum vote (para 10.7) and therefore not a reasonable alternative for the NP.</i></p> <p>In summary, the absence of alternative sites on which to develop housing and the unacceptability of a plan that does not meet with the aspirations of the local population to see housing delivered through the Neighbourhood Plan, it is concluded that reasonable alternatives to the proposed plan are very constrained and have been fully considered in forming the plan."</p>	Rewording SEA
8	<b>Background Documents</b>	
8.1	Background Documents list	Include emerging SDNP Local Plan.

