

Page number	Section	Comments	SDNPA Recommendation
Front Cover	Title	Regulation 14, is the Pre-Submission Stage, not Submission.	
	Foreword & Introduction	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.	Clarify and provide a consistent message on the intent of the FNDP.
		Terminology – In a number of places, when referring to Listed Buildings, Arabic numerals are used (1, 2) but they should be Roman numerals (I, II).	
		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.	Include timeframe for the Plan.
Pg.4	Introduction	The section on how the NDP fits into the planning system should be clarified. NDPs need to be in general conformity with the adopted Local Plan. In the case of Findon, this is currently the saved policies of the Arun 2003 Local Plan. While the Findon NDP will not be tested by an independent examiner against the emerging South Downs Local Plan, it is good practice for an NDP to be prepared mindful of the future adoption of Local Plan policy. Reference to West Sussex Structure Plan is out of date, the higher lever policy for Findon is the saved policies of the 2003 Arun Local Plan and the NPPF.	Clarify planning policy context
Pg.4	Introduction	It would be helpful to include the full web address to the Findon NDP website (http://findon.arun.gov.uk/)	Include full web address
Pg.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),	Include details of how the

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	Process	how and when a steering group was establish, 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.	Plan has been prepared.
Pg.4-5	Aims of the Plan	<p>This section would benefit from a new heading.</p> <p>The two statutory Purposes and Duty of the SDNPA should be provided in full:</p> <ol style="list-style-type: none"> 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. <p>The SDNPA also has a duty when carrying out the Purposes to:</p> <p>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>	<p>Give section on aims a clear heading.</p> <p>State Purposes and Duty in full.</p> <p>Acknowledge the purpose and limitations of a neighbourhood development plan.</p>
Pg. 6	Statement of Community Involvement	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?	Include summary of community engagement activity and issues raised.
Pg.7	Emerging Local Plan	The SDNPA became the LPA on the 1 April 2011 not 2012.	Update SDNP Local Plan time period.

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		The South Downs Local Plan will run from 2017 to 2032.	
Pg.8	National Guidance	The second paragraph under 2.2.2 <i>Local Planning Policy</i> would appear to fit better under the previous heading <i>National Guidance</i> .	
Pg.9	SDNP Local Plan	<p>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>	Expand on how Findon relates to the vision for the National Park.
Pg.10	SDNP Local Plan	<p>The 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.</p> <p>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>	“It follows that since becoming part of the National Park such <u>levels of protection remain</u> 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. ”
Pg.10	About	Typo in first sentence, should read “Understanding Findon <u>is</u> the starting point...”	Typo correction

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	Findon		
Pg.10 – 12	History of the Parish of Findon	<p>Maps showing the development of Findon would be helpful here and would illustrate the growth of the village.</p> <p>In addition to Findon Park and Muntham Park , mention could be made of the parkland at Cissbury.</p>	<p>Include maps and photos to illustrate text. This will also help cut down on the amount of text required.</p>
Pg.12	Community Profile	<p>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 be 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>	<p>Use graphs to show population statistics.</p> <p>Make regional comparisons and provide interpretation of statistics.</p>
Pg.13-14	Environment and Heritage	<p>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>Correct reference to Monarchs Way.</p> <p>Includes maps of environmental designations.</p> <p>Include clear statement on Conservation Area for Nepcote.</p> <p>Include census housing</p>

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		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.	data.
Pg.15	3.4.5	<p>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>	Consider scope for public realm enhancement in core village to address traffic issues.
Page 20	Sustainable Development	This section should be updated with details of the South Downs Local Plan – preferred options.	
Pg.21	Policy BT1	<p>Support for Businesses</p> <p>Policy requires clarification. Currently the wording may undermine the intention of the policy – “Proposals to upgrade, <i>convert</i> 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>	Review policy wording.
Pg.21	Para. 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.

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Pg.21	Policy BT2	Retention of Employment Land There will be strategic policy in the SD Local Plan on this topic. Draft policy SD28 Employment Land should be reviewed to see where FNDDP policy can provide additional detail if necessary.	Review necessity of policy having considered emerging SDNP Local Policy SD28.
Pg.22	Policy BT3	Support for new commercial uses Policy should also consider the impact on landscape, wildlife and cultural heritage.	Review policy wording.
Pg.22	Policy BT4	Retention of retail frontages 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 FNDDP policy can provide additional detail if necessary. The current policy wording appears to undermine one of the aims of the FNDDP to protect local shops and is unclear about which Local Plan policy it is referring to.	Review necessity of policy or review policy wording.
Pg.22	BT5	Car parking 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.	Review policy wording.
Pg.22-23	BT6 & BT7	Shop front and business signage 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.	Review necessity of policy or review wording and combine policies.
Pg.23	BT8	Support recreational and tourism activities 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 FNDDP policy can provide additional detail if necessary. The current policy wording should also refer to adverse impacts on wildlife and cultural heritage.	Review necessity of policy or review policy wording

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Pg.23	BT9	<p>Communications infrastructure</p> <p>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.</p>	Review necessity of policy or review policy wording
Pg.25	GA1	<p>Connection to sustainable transport, local networks and green infrastructure</p> <p>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.</p>	Review policy wording
Pg.26	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.	Revise supporting text.
Pg.25	GA2	<p>Footpath and cycle path networks</p> <p>It would be helpful to include a map of footpaths and cycle paths within the FNDP.</p> <p>Recommend that text of the policy is clarified as follows: "Specifically there is support <u>will be given</u> for new cycle links..."</p>	Include map and revise policy wording.
Pg.25	GA3	<p>Contributions to maintain and improve the network</p> <p>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).</p>	Remove policy. Include infrastructure in IDP.
Pg.26	GA4	<p>Parking and new development</p> <p>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</p>	Review policy wording.

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		<p>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 <i>Car and Cycle Parking Provision</i> refers to appropriate adopted parking standards in the locality and the provision of a parking standards SPD in future.</p>	
Pg.26	GA5	<p>A24 Improvements 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.</p>	Remove policy.
Pg.26	GA6.1	Repetition of GA2.2.	Remove repetition.
Pg.28	Community Facilities and Wellbeing	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.	Identify sites for new community provision.
Pg.28	CFW1	<p>Support Independent Living 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.</p>	Clarify planning criteria.
Pg.28	CFW2	<p>Support for new medical facilities What are 'appropriate' proposals? Policy needs to give clarity for applicants and decision makers.</p>	Clarify policy.

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Pg.28	CFW3	<p>Recreation facilities Provision of recreation facilities should also be in keeping with the landscape character.</p> <p>CFW3.1 – appears to use the wrong tense – “and visitors but has <u>have</u> identified a need...”</p>	Review policy wording
Pg.29	CFW5	<p>Protection of assets of community value 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 I. Is there any prospect of the asset being sold and equally is there any prospect of the</p>	Review list of proposed Assets, see SD Local Plan policy SD53 and revise policy wording.

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		<p>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 <u>are</u> 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 <i>New and Existing Community Infrastructure</i> should be referred to in reviewing this policy.</p>	
Pg.29	CFW6	<p>Local Green Space 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.</p>	Include reference to Appendix 2. Include Maps of LGS.
Pg.30	CFW7	<p>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 SD9: Dark Night Skies</p>	Review or consider the need for the policy in light of emerging Local Plan Policy SD9: Dark Night Skies
Pg.30	CFW8	<p>Off street parking Repetition of policies GA4 and BT5. Remove policy.</p>	Remove policy.
Pg.31	ES1	<p>Gaps between settlements 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 <i>Landscape Character</i> which refers to the protection of existing undeveloped gaps between settlements.</p>	Review and future-proof policy.
Pg.31	ES2	<p>Surface water management The SDNPA is the approval body for SUDS and will make the decision on the suitability of</p>	Review necessity of policy or review policy wording

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		<p>sustainable drainage provision in consultation with the Lead Local Flood Authority (WSSCC).</p> <p>There will be development management policy in the SD Local Plan on this topic. Draft policy SD42 <i>Sustainable Drainage</i> should be reviewed to see where FNDP policy can provide additional detail if necessary.</p> <p>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>	
Pg.32	ES3	<p>Protection of trees and hedgerows</p> <p>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. Policy ES3 is currently very generic and doesn't contain anything locally specific to Findon.</p>	Review necessity of policy or review policy wording
Pg.33	ES4	<p>Renewable Energy</p> <p>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. Policy ES4 is currently very generic and doesn't contain anything locally specific to Findon.</p>	Review necessity of policy or review policy wording
Pg.33	ES5	<p>Buildings and structures of character</p> <p>Title of text is missing the word 'Special'.</p> <p>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.</p>	<p>Provide details of criteria for local listing.</p> <p>Put all policy text into a single text box.</p>

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		It would be helpful to keep all the policy text and list of buildings in a single policy box.	
Pg.35	ES7	<p>Flint Walls</p> <p>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?</p>	Support policy with photos and map of protected flint walls.
Pg.36	HDI	<p>Spatial plan of the Parish</p> <p>We have fundamental concerns about the approach proposed in Policy HDI.</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 <i>positively prepared</i> 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 SDNPA.</p> <p>The first criteria of policy HDI 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>Furthermore, permission can still be given for development proposals within a settlement boundary</p>	Policy approach should be re-considered. The approach is not justified and is unlikely to be implemented.

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		<p>as windfall development (i.e. they were not previously allocated).</p> <p>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.</p>	
Pg.36	HD2	<p>Local Connection</p> <p>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.</p> <p>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><i>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.</i></p> <p><i>Development will be considered to contribute towards meeting an identified need, where it will provide accommodation for any of the following:</i></p> <ul style="list-style-type: none"> • <i>existing residents of the parish requiring separate accommodation;</i> 	Review policy wording.

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		<ul style="list-style-type: none"> • <i>persons who have long standing family links (immediate family only e.g. parent, sibling or adult child and step relationships) with the parish;</i> • <i>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;</i> • <i>persons with full time employment based within the parish;</i> • <i>persons who have had to move away from the parish due to a lack of affordable housing, but would like to return;</i> <p><i>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.</i></p>	
Pg.37	HD3	<p>Redundant Agricultural and Rural Buildings and their immediate surroundings</p> <p>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.</p>	Review necessity of policy or review policy wording
Pg.23	HD4	<p>Live / Work units</p> <p>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.</p> <p>HD4.1 Type – use rather than using</p> <p>HD4.3 reads as policy criteria and should be included in the policy text rather than the supporting</p>	Review policy wording.

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		text.	
Pg.38	HD5	<p>Self Build Houses Policy refers to allocated sites, however there are none in the Plan. There is no clear definition of 'lower cost' housing. Affordable housing is unlikely to be deliverable as self build.</p>	Review policy wording. Petersfield Neighbourhood Plan includes self build allocations and may be helpful in reviewing this policy.
Pg.38	HD6	<p>Alterations and Roof Extensions 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.</p>	Review policy approach.
Pg.39	HD7	<p>Edge of Boundary Houses and Paddocks 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?</p>	Review policy approach
Pg.39	HD8	<p>Design of development 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?</p>	Review policy approach
Pg.39	HD9	<p>Outdoor space We'd question how achievable these open space standards are when the FNDP seeks to restrict</p>	Review policy approach

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		new housing within the settlement boundary where open space will be limited.	
Pg.40	Supporting Evidence	<p>Dates should be given for evidence documents. Supporting evidence should be made available on the NDP website.</p> <p>Background documents – South Downs National Park <u>Partnership</u> 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.</p>	Provide links to supporting evidence.
Pg.41	Appendix 1	It is Arun District Council which holds the register of ACV rather the local planning authority.	Clarify text.
Pg.42	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.	Review Local Green Space designations to ensure they comply with the requirements of the NPPF.

