



22 April 2016
Mr Hitchcock (Chairman)
Westbourne Parish Council

Dear Sir/Madam,

Subject: South Downs National Park Authority's response to the Westbourne Neighbourhood Development Plan Pre Submission (Regulation 14) consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the pre submission version of the Westbourne Neighbourhood Plan. The National Park Authority welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community. The SDNPA have made a number of comments relating to specific parts of the plan below.

Generally the SDNPA would like to see the plan make more specific reference to the proximity of the National Park, particularly in regard to development constraints and the importance of protecting the landscape. Whilst part of the Parish falls within the National Park it is also important that the setting of the National Park is not unduly harmed by inappropriate development, therefore consideration should be given to the constraint created by views into and from the National Park.

Please note these comments are prepared by SDNPA officers only, they have not been considered or approved by SDNPA members.

SDNPA officers make the following comments on the Westbourne NDP:

Reference	Comment	SDNPA recommendation
Section 1.3 Planning Policy Context	Whilst paragraph 1.3.4 makes reference to the SDNP Local Plan the Westbourne Neighbourhood Plan (WNP) should make specific reference to the Purposes and Duty placed on National Park Authorities, as these need to be taken into consideration by those planning in the National Park. More information on the purposes and duty can be found here https://www.southdowns.gov.uk/national-park-authority/our-work/purposes-duty/	Make reference to the Purposes and Duty of the National Park Authority
Section 1.3 Planning Policy Context	Consideration could be given to the specific paragraphs in the National Planning Policy Framework (NPPF) which refer to protected landscapes such as National Parks, the relevant paragraphs of the National Planning Policy Framework are paragraphs 115 and 116.	Consider including a reference to specific paragraphs of the NPPF which refer to National Parks
Paragraph 1.3.4	The SDNP Local Plan is an emerging plan, until its formally adopted the current planning policy for the part of Westbourne in the National Park are the saved policies of the Chichester District Local Plan 1999	Correct reference to development plan document for the National Park part of the Parish
Paragraph 1.4.1	SDNPA understanding is that the Westbourne NDP has been screened out, and therefore doesn't require an SEA/SA, this sentence should be amended to reflect this decision and the decision notice published with the submission version of the WNP	Amend sentence in light of screening opinion provided by Chichester District Council
Section 2 Parish Profile	This section provides relatively little commentary on the environmental characteristic of the Parish. It describes in some detail other characteristics of the Parish, including housing tenure local business and employment but there is relatively little on the natural capital in the Parish. Further reference could be made to the open space, natural environment, important views which can be found in the Parish. More emphasis could be placed on the fact that the Northern part of the Parish falls within the South Downs National Park which provides protection to important landscape, biodiversity and cultural heritage. This section has minimal commentary on the Historic built and natural environment. I am quite sure there will be important historic aspects to the Parish which need to be recognised in the Parish Profile, as these are likely to serve as constraints in planning in the future. As you're vision clearly states that the	Consider providing further information on the natural environment and historic environment of the Parish

	plan wants to retain its unique and distinctive historic identify, this should be recognised in the Parish Profile.	
Paragraph 2.1.3	Since the forming of the South Downs National Park the area is no longer designated as an Area of Outstanding Natural Beauty.	
2.8.1 Development constraints	A significant development constraint will be that part of the parish is designated National Park. This places particular constraints on development as per paragraphs 115 and 116 of the NPPF. This section should also make clear that the SDNP forms part of the Parish but the setting of the National Park should also be a consideration in planning. So the National Park is a constraint in itself but development could also be constrained in close proximity to the border of the National Park to avoid development having a detrimental impact on the setting of the National Park	Consider emphasising the development constraint relating to the SDNP designation and the setting of the SDNP
Policy OA1 Development Allocation	This policy does not provide any detail regarding the allocations. As policies S1, SS2 and SS3 describe the allocations this policy is not required. If the intention is to assist the reader in understanding that the WNP has to make an allocation this policy should be included as supporting text not a Policy	Consider removing Policy OA1
Policy OA2 Affordable Housing	This policy doesn't provide any additional detail or information which could assist in the determination of a planning application, it merely repeats and signposts to National and Local Planning Policy, therefore the policy is not required. If the intention is to help people understand what proportion of new development will be affordable housing this should be set out in the policy or in supporting text.	Consider removing Policy OA2
4.3.6	It is not clear why the sustainable development policy is in the Natural Environment section. Obviously the natural environment is a significant matter in sustainable development but this policy is about development not specifically about the protection of the natural environment	Consider moving Policy OA4 to a more appropriate location in the plan, it may be more appropriate to have this as the first policy in the plan
Policy OA5	This policy would benefit from a map to accompany the policy wording to show where the gaps are. It is difficult to appreciate where the gaps are in the parish and why they are so important from the text alone. The first bullet point of the policy refers to the distinct breaks between the village and other settlements, what are these other settlements, they need to be named and shown on a map so it's easy for the reader to appreciate the intent of this policy. The policy also requires further justification for including such expansive tracts of land as gaps.	Provide further justification to support this policy. Provide a map and more detail as to the location and function of the gaps
Policy OA6	Incorrect reference to figure 7 it should read figure 8. Section 4.5.2 suggests that the settlement policy boundary has been reviewed and revised. It is not clear where there have been changes to the SPB. If there have been revisions these need to be set out clearly and justification for those amendments should be provided in supporting text	Amend reference to figure 7. Provide further justification for any amendments to the

		settlement policy boundary and provide clear mapping of where these modifications have occurred.
Policy LGS1 Cemetery Green Space	Further justification is required to support the allocation of the Cemetery as a Local Green Space. Currently the plan makes reference to the fact that the sites needs to be demonstrably special to the community but it doesn't say how the site is demonstrably special.	Provide justification to support the allocation of Local Green Space
4.7 Policies for local distinctiveness	Comments earlier on the Parish Profile indicated that there was little information about the historic environment (built or natural) however this section highlights that there is significant important historical aspects to the parish, these should be reflected in the Parish profile	Provide further information on the important historical aspects of the parish in parish profile
Paragraph 4.7.2	The intent of this policy appears to link closely to the intention of the gaps policy earlier. This paragraph clearly states that the intention of the policy is to 'prevent coalescence with Westbourne Parish, Hambrook, Emsworth and Southbourne and maintain the separate identities....' The gaps policy delivered the intention of this policy. Therefore it may be more appropriate to have the gaps policy in the section for policies on local distinctiveness.	
Policy DS2 Provision of off road parking	Is there robust evidence to support the need for off road parking?! If so this needs to be set out clearly in support of the policy. I am not sure that Neighbourhood Plans have been successful in ensuring adequate parking is provided in accordance with potential occupation numbers, so this may be an area challenged in examination. However, I would draw the group's attention to a car parking policy which has successfully passed examination, this policy states: Development proposals will be supported only if they include the maximum level of off-street parking consistent with the current standards. New development must consume 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.	Provide robust evidence to support car parking policy. Consider car parking policy which has successfully passed examination
4.10.5	The key criteria used in assessing locations for development include impact on landscape, but refer specifically to local gaps and village gateways. The SDNPA would strongly recommend that the South Downs National Park is also an important aspect of this particular criteria.	Consider including the SDNP as an important criteria in relations to landscape
Paragraph		Amend plan or text

<p>4.11.1 Land to the West of Monks Hill</p>	<p>Given the distance from the settlement core and the size of the site, development of the site in its' entirety would not be appropriate in terms of impacts upon the character of the settlement and wider landscape, especially as glimpses towards the site may be possible from within the National Park during the winter. It should also be noted that the recreation ground on other side of the road is a local wildlife site (SNCI).</p> <p>However, without prejudice to the above concerns, if the site is to continue to be considered for allocation, it is suggested that this should be for a limited number of units (the Neighbourhood Development Plan consultation suggests 8 units,), to be accommodated towards the south-eastern end of the site, and accompanied by a robust landscaping scheme including new native planting between the development and remainder of the field, along with retention of significant parts of the hedgerow alongside Monks Hill.</p>	<p>Consider including points from SDNPA comments in site allocation policy for Monks Hill</p>
<p>Paragraph 4.11.5 Land adjacent to Chantry Hall, Foxbury Lane</p>	<p>This site was the subject of an application for 28 dwellings with access from Foxbury Lane (WB/12/04779/FUL). This was refused and the subsequent appeal (APP/L3815/A/13/2205297) was dismissed, largely on the grounds of impacts upon the character and natural beauty of the area. Given the strength of the Inspector's concerns, this site would not appear to be appropriate for a housing allocation. However, if it were to be considered, the SDNPA would suggest that the hedgerow along Cemetery Lane should be retained and enhanced, with road access to the site being obtained directly from the B2147 Foxbury Lane rather than Cemetery Lane. The SDNPA would also recommend that the inspectors comments are taken into consideration, particularly in relation to landscape impact if the site is to be included in the NDP</p>	<p>Take into consideration all comments made by the inspector in the appeal dismissal, especially in relation to landscape impact if the site is to be taken forward in the NDP.</p>

If you would like to discuss any of these matters further please do not hesitate to contact me directly

Yours Sincerely

Chris Paterson
Communities Lead

01730 819286

Chris.paterson@southdowns.gov.uk