



26 September 2016

Patching Parish Council
c/o 1 Church Farm Close
Patching
West Sussex
BN13 3FA

Dear Mr. Frost

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

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

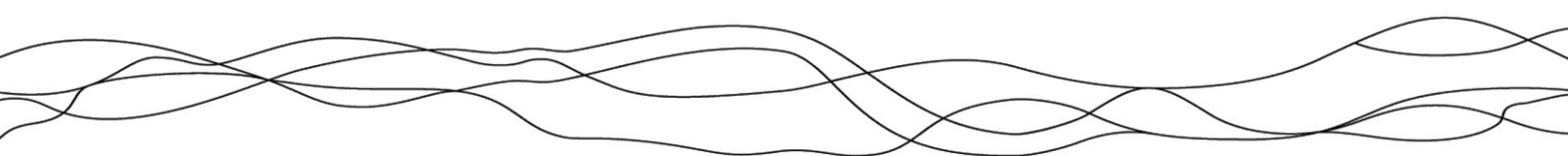
The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Patching Parish Council in the preparation of the PNDP. Localism and planning in a protected landscape is challenging, as the group have to balance the aspirations of residents and visitors with the challenge of conserving and enhancing the special qualities of the South Downs National Park. In particular the SDNPA welcomes the ambition of the plan to seek to deliver housing specifically for those with a clear local connection, although there are some concerns relating to this policy set out in the attached representation.

In summary the SDNPA believes that the minor modifications proposed in the attached representation will ensure the PNDP will be in a position to move towards the Submission stage of Neighbourhood Planning. The PNDP does require some further work to provide robust justification and evidence to support the housing policy HBT1 set out in the PNDP. In addition the SDNPA representation sets out a number of general comments relating to the entire PNDP. There are also a number of comments relating to specific policies in the PNDP. These points or minor amendments will strengthen the policies contained in the PNDP and ensure a robust plan for the Patching.

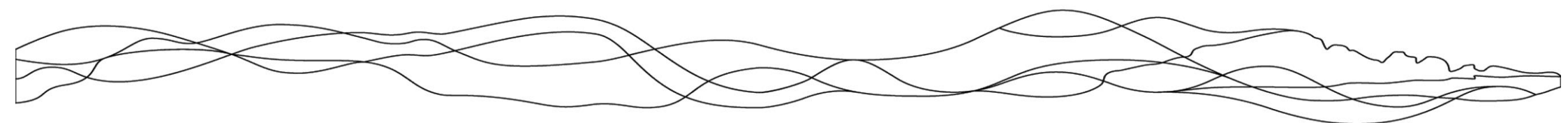
If you have any questions regarding our enclosed representation please do not hesitate to contact Communities Lead Chris Paterson who will be able to provide further clarification if necessary.

Yours Sincerely

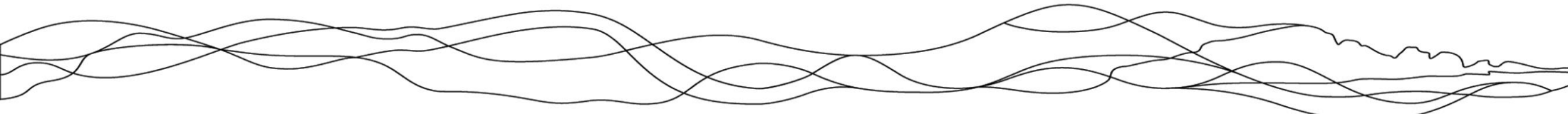
Lucy Howard
Planning Policy Manager



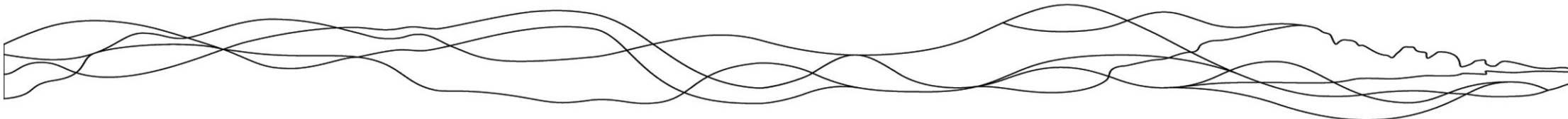
Page No	Section	Comments	SDNPA Recommendation
6	Introduction 1.5	Text should read: 'to coincide with the horizon date of the emerging new South Downs National Park Local Plan' Throughout the Patching NDP there is reference to the emerging South Downs National Park Local Plan, the correct name for this plan is the South Downs Local Plan (SDLP), the words 'National Park' should be removed	Correction
25	Places 1	Historic Buildings This is effectively a duplication of national policy and legislation and repeats the intention of the South Downs Local Plan Policy SD11. Therefore it is not considered necessary to include this policy	Consider the need to include this policy
226	Places 2	Patching Conservation Areas This is effectively a duplication of national policy and legislation. Therefore it is not considered necessary to include in a NDP. We welcome the community action to include additional locally listed buildings in partnership with the SDNPA.	Consider the need to include this policy
26/27	Places 3	New Conservation Areas The document quite rightly states that new Conservation Areas cannot be designated through a NDP and says that the Parish will assist the SDNPA with the designation process. Suggested boundaries are provided. Conservation Areas can only be designated if they have the appropriate qualities and the National Planning Policy Framework recommends caution against dilution of these standards. Following the production of the NDP discussion can be held with Conservation Officers to progress this aspiration	No amendment required.
28	Places 5	Conservation & Enhancement of the Natural Environment Consider including the word demonstrably in the first sentence of policy text....	Amendment and addition to



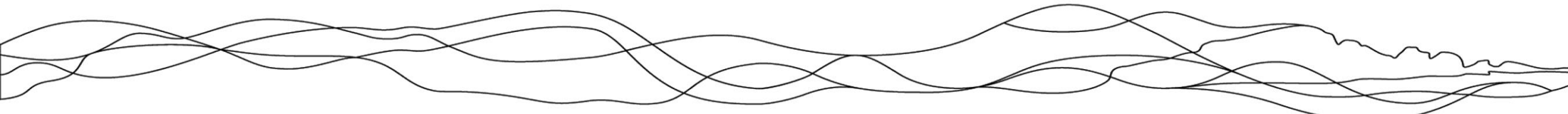
Page No	Section	Comments	SDNPA Recommendation
		<p>'Development proposals which <i>demonstrably</i> conserve...'</p> <p>Last bullet point – suggest remove the word 'important' and add the following: <i>'skyline views and views to, from and within the settlement and those of, and within the wider countryside.'</i></p> <p>Suggest additional bullet point added to policy: <i>'New proposals should seek to conserve and enhance existing green infrastructure networks including footpath corridors, hedgerow & ditches, woodlands, unimproved grassland and integrate them with new features within any development'</i></p> <p>Final sentence of policy wording - suggest add the following: <i>'Landscape and Visual Impact Appraisal should be undertaken to inform the development of design proposals and mitigation.'</i></p>	<p>wording to strengthen policy</p> <p>Additional text to strengthen policy</p> <p>Amendment and additional text to strengthen policy</p> <p>Additional text to strengthen policy</p>
31	Places 8	<p>Equine Development</p> <p>Suggest the following wording is added to the policy title or in supporting text Equine Development <i>for conservation land management approach to horse paddocks and land under equine use'</i>.</p> <p>Suggest the following paragraph is added to the supporting text for Planning Policy Places 8:</p> <p><i>'The following matters should be considered in relation to this policy: Careful stocking/grazing density, creation of hedgerow frameworks for paddocks which allows for temporary subdivision, headlands of meadow grass which are un-grazed and cut yearly in September, manure collection, low chemical worming programme, grazing rotation (sheep & resting pasture), storage areas for equine equipment to be carefully sited to avoid 'clutter' in the landscape.'</i></p>	<p>Amendment to wording to strengthen policy</p> <p>Additional supporting text</p>



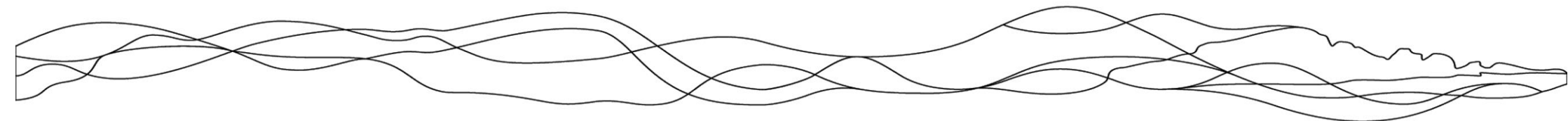
Page No	Section	Comments	SDNPA Recommendation
32	Places 9	<p>Protection of trees, woodlands and hedgerows</p> <p>The 15m buffer zone (bullet point 3) is not in accordance with current guidance and reference to the use of current industry guidance (such as BS 5837 Trees in Relation to Demolition, Design and Construction) is recommended.</p> <p>The 4th bullet point refers to replacement planting and there are three issues here which should be addressed in the policy wording or supporting text:</p> <ul style="list-style-type: none"> • Replacement planting should be with appropriate locally native species unless there are overriding reasons for planting exotic species; • The policy could also refer to the need to undertake succession planting of existing trees where they are mature/over mature. • New tree plantings should be given sufficient space to allow trees to develop into their natural size and shape. 	<p>Consider amendment to bullet point 3 including reference to <u>BS 5837 Trees in Relation to Demolition, Design and Construction</u></p> <p>Consider additional wording to strengthen the policy</p>
32	Places 10	<p>Flood Risk and Surface Water Drainage</p> <p>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). Whilst there will be a development management policy in the SDLP on this topic, and therefore duplication is unnecessary, if it is to be retained this policy could be reviewed to reference sustainable drainage and provide additional detail if required.</p> <p>Sustainable urban drainage measures should be integrated within the landscape design as part of a multi-functional layout. Where possible this should incorporate locally appropriate surface water features.</p>	<p>Consider reference to Sustainable Drainage for new development</p>



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33	Places II	<p>Lighting in New Development</p> <p>This policy is essentially duplicates the SDLP policy on Dark Night Skies, if the Parish would like to keep this policy, consideration should be given to the hierarchy proposed in Policy SD9 of the SDLP for lighting in development proposals, this hierarchy could be included within the Patching policy.</p>	<p>Consider reference to the Dark Night Skies policy of the SDLP to strengthen policy wording, and inclusion of hierarchy</p>
34-35	HBTI	<p>New Residential Development</p> <p>The SDNPA support the general intention of this policy, however, some queries have been raised regarding the detail of the policy, and these are set out below for consideration:</p> <ul style="list-style-type: none"> • Does the Parish Council have robust evidence to demonstrate the housing need which this policy seeks to address? • Is the policy referring to affordable housing or market housing? It is assumed it is market housing and that the need for such development is two-fold: <ol style="list-style-type: none"> 1) People living with family who can't afford or find their own home in the village (i.e. it is a financial and / or availability issue) 2) People wishing to downsize or move to more suitable accommodation (i.e. it's an availability issue) <p>It needs to be tested to ensure it works for both circumstances.</p> <p>The policy requires an applicant to be registered with the Parish Council to fulfil their local connection. How will this be managed and transparent, not just now but over the lifetime of the plan?</p>	<p>Consider rewording the policy to ensure that it provides dwellings for those in housing need.</p> <p>Consider rewording the policy to make clear whether this policy is seeking to influence market or affordable housing.</p> <p>Consider reviewing the criteria which are set out to</p>



Page No	Section	Comments	SDNPA Recommendation
		Is the policy sufficient, in combination with others to ensure this does not result in sporadic development throughout the Parish?	demonstrate a local housing need. Criteria should be considered by the Local Housing Authority to ensure they are robust and appropriate Consider rewording point B to remove the possibility for new dwellings to be located in unsustainable locations
37	HBT3	HBT3 Replacement and Extension of Existing Dwellings Consider whether there is a need to include this policy as it is effectively duplication of the SDLP policy SD45 Replacement Dwellings and Extensions	Consider the need to include this policy
38-39	HBT6	HBT 6 – New Commercial Development Consider combining bullet point's b and c, so the policy requires commercial activity or new rural enterprises to not have a harmful impact on the character and appearance of the locality, including an increase of HGV traffic on narrow parish roads. The reference to the A280 and A27 should be removed as these are clearly not narrow parish roads or thoroughfares	Consider rewording Remove reference to A280 and A27
43	5.1 (a)	This paragraph refers to the 'saved' policies of the Arun Local Plan (2007) the correct reference is the 'saved' policies of the Arun Local Plan (2003)	Amend reference to Arun Local Plan
43	5.2	Reference to the Annual Monitoring Report needs to be amended to read <u>Authority</u> Monitoring Report	Amend reference to Annual Monitoring Report
Appendix A. Maps		It would be helpful to include a key on each of the maps to make clear what the	



Page No	Section	Comments	SDNPA Recommendation
		different colour lines signify The key on map 4 (a) should include reference to <u>grade I</u> , <u>grade II</u> and <u>grade III</u> The key on Map 4 (c) should be larger to ensure it is legible Map 6 (a), (b) is this site within the Neighbourhood Planning Area, if not this should be made clear with the implications set out in the NDP at PLACES 5	

