

28 June 2021

Wisborough Green Parish Council
Louise Davies
c/o clerk@wisboroughgreenpc.org

Dear Louise

Subject: **Wisborough Green Neighbourhood Plan Review, Reg 14 Pre-submission consultation**

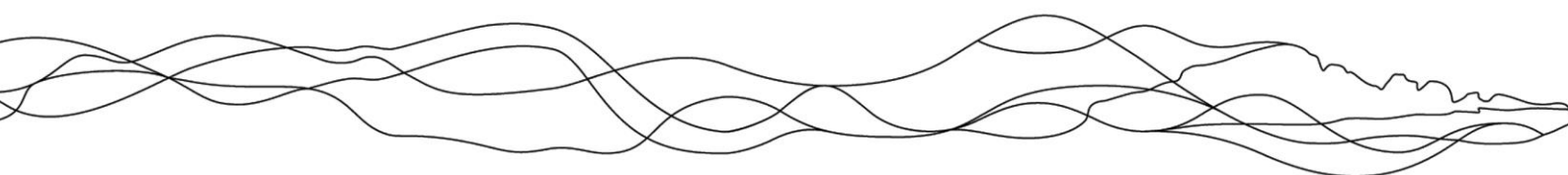
Thank you for consulting the South Downs National Park Authority (SDNPA) on the consultation draft of the Wisborough Neighbourhood Plan Review (WNPR). The National Park Authority welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community.

We note the objectives of the WNPR and the proposed allocation of an additional 4 housing sites to meet the expected housing requirement (40 homes) from the Chichester Local Plan Review. Whilst these sites are outside the South Downs National Park (SDNP), we would like to draw your attention to paragraph 175 of the consultation draft NPPF which states (new text underlined):

175. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks. The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes.

This paragraph is relevant to development proposals within the setting of the SDNP. Furthermore, we note and support the retention of WNPR Policy OA7: *Land Adjoining the South Downs National Park* but would add that the setting of the National Park can extend beyond land, which is immediately adjacent to the SDNP.

We are supportive of the WNPR emphasis on retaining the compact nature of the village and ensuring key facilities are within a short walking distance (Policy OA2). Adequate provision needs to be made for people walking or cycling to ensure they can access these facilities without travelling by car.



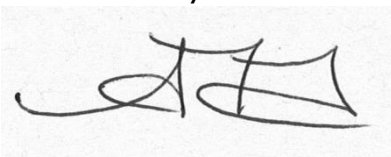
We note and support the inclusion of new Policy EN7: *Biodiversity*. Given the presence of bats locally and their protected habitat, we recommend reference is also made to the [Sussex Bat Protocol](#) within the supporting text for this policy. We note the conclusions of the Appropriate Assessment in regards to the protection the Mens SAC and Ebernoe Common SAC, and that the policy wording in the WNPR is deemed sufficient to ensure that there is no loss of functionally linked bat habitat as a result of development within the Parish.

We also welcome the additions to Policy IN3: *Street Lighting and Dark Night Skies*, which seek to conserve the quality of dark night skies in the parish. We do feel the policy needs some further refinement to be effective and whilst we appreciate this policy relates to the whole parish, it should be noted that South Downs Local Plan Policy SD8 *Dark Night Skies* and the [Technical Advice Note](#) apply only to those areas of the parish within the National Park. The supporting text to the policy should explain the meanings of ILP and EI(b). We consider the criteria of part b of the policy could be better explained so that applicants fully understand what is being sought. It is also unclear what is meant by part d of the policy. Installing lighting only for safety purposes seems overly restrictive and it is unclear what is meant by low-level lighting. Is the intention that only downward facing lighting would be supported? Skylights / lanterns are particularly problematic and should be avoided wherever possible.

A final minor comment to make, regarding the summary section, is to include details that the original WNP was also made by the SDNPA on the 9 June 2016, for that part of the plan which is within the SDNP.

Please do get back to me if you have any queries on these comments or if you need any further information as you prepare to submit the WNPR.

Yours Sincerely



Amy Tyler-Jones
Senior Planning Policy officer
Amy.tyler-jones@southdowns.gov.uk
01730 819272

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie

