

Page No	Section	Comments	SDNPA Recommendation
15	3.3	The correct name for the emerging Local Plan being prepared by the SDNPA is the South Downs Local Plan.  The SDNPA Local Plan will now be adopted in 2018	Remove the words 'National Park', update text.
19	4.1	Vision – could also refer to landscape and heritage	Consider inclusion.
19	4.2	Housing – suggest last bullet includes 'other than where essential for rural workers'  SDNP and landscape – suggest first bullet includes ....' And enhance the National Park and its setting and the wider landscape'.  The South Downs National Park <u>Authority</u> is the planning authority for the National Park.	In accordance with NPPF para 55.  There is a tendency for the document to safeguard the landscape of the National Park but not the wider countryside e.g. the A24 corridor.  Amend 'To work with the SDNP' to 'To work with the SDNPA'.
21	Policy I	Second para: - Does Old London Road have a built-up area boundary? It is unclear from the map. - A definition of what you consider 'infill' to be would be helpful. - It is worth noting that with an upper limit of 5 none of these infills would provide affordable housing, because 5no is the threshold for the National Park and 10no. elsewhere (i.e. the 6 <sup>th</sup> or 11 <sup>th</sup> dwellings respectively are the triggers). This is confirmed in the recently revised NPPG 'Planning Obligations'. - Extensions should be acceptable both within and outside the built up area and London Road  Third para  'Control of development' - suggest this phrase replaced with 'management of', or it is deleted	Consider clarification of policy wording.

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		<p>Fourth para</p> <p>‘Broad location of green gaps’ . We are concerned that this will have little meaning / effect in practice unless shown on policies map. Gaps are also referred to in 4.14 as ‘defined’</p>	
22	4.13	We still have concerned that the housing provision relies heavily on the loss of employment, which could run counter to the concept of a mixed and balanced sustainable community. We are aware that this is being tested through the application on the Paula Rosa site.	
22	4.14	<p>– ‘Defined green gaps’ – where are these defined?</p> <p>- suggest that another criteria is added i.e. locations are sustainable</p>	Amend text.
22	4.16	This is the only mention of a ‘Settlement Boundary’, which elsewhere is referred to as the Built Up Area Boundary. The naming of this should be consistent to avoid confusion.	Replace ‘Settlement Boundary’ with ‘Built Up Area Boundary’
25	Policy 2	<p>ii &amp; vi Old London Road - These are located outside SDNP, but as a general point we consider that they are well away from services and as such we again question their sustainability.</p> <p>iv Land at Chantry Lane - Again the loss of rural employment land is a concern and should be referenced back to an Employment Land review. At 4.28 the term ‘transition from urban to rural’ could be made more precise. The site is within the rural area not built up area. It is also within or adjoins the SDNP. Hence it is not transition from urban to rural which would be called for, but harmony between new development and its rural location.</p> <p>In addition it is also important that the access is mindful of the character of rural roads, avoiding over-urbanisation of these (pavements, lights, signs)</p> <p>The requirement for a Landscape Character Assessment to accompany any proposal at Chantry Lane Industrial Estate is welcomed</p>	Update policy wording to incorporate comments and suggested changes.

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		<p>An additional reference within the supporting text should be added in order to clarify what the policy wording would require in practice:</p> <p>“discussion should take place with the relevant Mineral Planning Authority prior to any specific development proposal for the site, to establish what mineral resource information (and the level of information) is required by the Mineral Planning Authority to ensure that important minerals are not sterilised by other development”.</p> <p>West Sussex County Council (WSCC) should be consulted to ensure that the proposed change to mixed residential development at this site would comply with their mineral safeguarding policy, or whether additional wording is required. It is hoped that such consultation has occurred.</p> <p>v. Ravenscroft Allotments</p> <p>Criterion b should stress need for comprehensive development, otherwise there is risk of developers chunking-up the site to avoid affordable housing threshold.</p> <p>4.29 states that the allotments are to be relocated on land to the south i.e. SDNP land but later refers to it being nearby (policy 13). This needs to be clarified and tested, ideally through pre-app noting that allotments per-se may be agricultural use. If it were not acceptable to the SDNPA, this could affect soundness of this site.</p>	
28	Policy 3	<p>North Farm Washington – This is clearly a very sensitive location for the extension and intensification of employment. It poses risks to the SDNP in terms of loss of tranquillity and damage to the rural character of the area at a very narrow part of the National Park.</p> <p>ii. Inadvertently suggests that only the landscape value of the Park is important. Suggest the following: They conserve or enhance the rural landscape of the A24 corridor. Where that corridor is also within the National Park development should also meet the purposes of the National Park.</p>	<p>Having met with the Wiston Estate we consider that a separate policy addressing this site should be included in the NDP. We would like to see reference to development of the site being part of a Whole Estate Plan or other comprehensive review of the Estate’s long term future. It should demonstrate how the development of the site will contribute to the purposes and duty of the National Park. We have no doubts that this is</p>

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			the intension of the Estate but as written the policy relates to standard forms of employment development, particularly to the replacement of employment land being lost to housing within Storrington. This is not the case. The future of this important site needs very careful consideration which goes beyond a standard application for employment type uses. If handled well it has the potential to be a real asset to Washington and the SDNP.
29	Policy 5	Policy 20 referred to by mistake	Amend error
30	4.33	It may be worth mentioning that some changes to/from retail may be permitted development.	
30	Policy 7	The SDNPA would encourage heathland restoration of the site, as this relates to the SDNPA's current Heathlands Reunited project which seeks to create a heathland habitat corridor.	Consider including an aspiration to restore heathland on the site in the supporting text.
30-31	Policy 8	The Policy should more closely reflect the emerging South Downs Local Plan policy SD20 Sustainable Tourism and the Visitor Economy, particularly in regard to encouraging use of sustainable transport and year-round visitor economy. The provision of parking should include that needed for bicycles.	Consider including additional wording relating to sustainable transport and year-round visitor economy, particularly where the development is within the National park.
31	Policy 9	Most broadband and telecommunications infrastructure installations fall within permitted development, and the policy is therefore of limited use.	Remove policy but consider including wording limiting the prominence of broadband and telecommunications installations in the supporting text.

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33	Policy 14	The National Park is now an International Dark Sky Reserve	Include reference to the International Dark Sky Reserve in the supporting text.
33	Policy 15	No reference to sustainable drainage schemes in the general, or site specific policies have been found in the plan.	<p>Suggest that as part of the Green Infrastructure policy a bullet point is included which says:</p> <p>Landscape design proposals should seek to create multifunctional networks of spaces and features which connect with surrounding and existing biodiversity corridors. Connections to the existing footpath and cycleway networks should be prioritised to ensure that new schemes are walkable and cyclable where possible. New footpath and cycling routes should be included in any masterplanning process. 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>
34	Policy 16	On p4 of the Local Green Spaces Report there is reference to the Glebe Field site being omitted at pre-submission, and subsequently included in the list of Local Green Spaces as no 25 in the submission version of the Plan, however this is not evident on the submitted list on p34.	Include Glebe Field under the list of Local Green Spaces.

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35	Policies 17 & 18 Air & Traffic	What scale of development do these policies apply to? Needs to be proportionate. (E.g. Nationally an air quality assessment is only needed for major development (10 dwellings+ or 1000sqm commercial, ditto transport assessments, although a lesser transport Statement can be required for smaller cases, on merit.)	Clarify requirements.
37	Policy 19 - Car Parking	No mention of multi-modal – cycle parking. High parking standards will work against dense development in sustainable centres. If this is due to evidence of high ownership levels and low accessibility by other modes, this needs to be evidenced.	
37	Infrastructure	5.4 – 5.6 should refer to role of SDNPA in CIL and 106.	
39-43	Maps	It would be helpful to indicate the National Park boundary on all maps where applicable, and that Map 5 is entirely within the National Park.	Include National Park boundary.
	General	There is no reference to views to and from the SDNP in the document, which is an important aspect of the settlements' relationship with the SDNP. Consider including views as a general policy -  'Views to and from the surrounding countryside are important to local people and contribute to the identity and quality of life in the settlements. New development shall protect these views and also identify through a robust masterplanning process where new views to the surrounding countryside can be provided through the design and layout of streets and spaces.'	Consider including general policy on views.
Schedule of Evidence		The schedule of evidence documents refers to the SDNP AONB Management Plan – reference to 'AONB' should be removed	Remove 'AONB'
Schedule of Evidence		The South Downs Integrated Landscape Character Assessment 2011 should be included.	Include the South Downs Integrated Landscape Character Assessment 2011