



Donna Moles
Senior Planning Officer
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton, BN17 5LF

18 July 2016

Dear Donna,

Subject: Aldingbourne Neighbourhood Development Plan 2014-2034, Regulation 16 Submission Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the submission version of the Aldingbourne Neighbourhood Development Plan (ANDP). The National Park Authority welcomes the publication of this plan, which is the result of a considerable amount of hard work by the parish council and the local community.

Please find attached our formal response. Please do get back to me if you have any queries on this representation.

Yours Sincerely

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Chief Executive: Trevor Beattie

SDNPA Response to the Regulation 16 Consultation on Aldingbourne Neighbourhood Development Plan

Para/Page	Comment
	General Comments
Cover	There appears to be an error on the cover page, which should be entitled Aldingbourne Submission Neighbourhood Development Plan (ANDP)
Cover	The date of the plan is 2014-2034, is this deliberate or should the plan commence in 2016?
2.2.2-2.2.5	The SDNPA welcomes the publication of this plan, which is the result of a considerable amount of hard work by the parish council and the local community. The ANDP provides a clear and accurate statement on the local planning policy context in paragraphs 2.2.2-2.2.5.
2.2.5	A small north part of the of Aldingbourne Neighbourhood Area is within the South Downs National Park, and the SDNPA welcomes the clear explanation made of the emerging South Downs Local Plan in paragraph 2.2.5. The plan would however benefit from reference to the South Downs National Park purposes and duty, and opportunities to do this are set out in the response below.
	Throughout the ANDP there is reference to the emerging 'South Downs National Park Local Plan', the correct name for this plan is 'South Downs Local Plan (SDLP)', the words 'National Park' should be removed
	There is some confusion with regard to the naming of the Settlement Boundary, which in places is referred to as the Built Up Area Boundary. The naming of this should be consistent to avoid confusion.
	Context
2.2.2	<u>Local Planning Policy</u> The SDNPA is a Planning Authority. Consider revising the first sentence to: 'The majority of the Parish lies within Arun District Council Planning Authority Area, with two small areas in the north lying within the South Downs National Park Planning Authority Area'.
	About Aldingbourne
Map p13	The site map on p13 does not include all of the Designated Neighbourhood Area, specifically the northern boundary.
3.5.7	<u>National Park</u> All bodies and organisations have a duty to have regard to National Park purposes and Duty when carrying out their function. Therefore the ANDP should seek to demonstrate how it meets with the requirement of Section 62, 11(A) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated, for those areas of the parish which lie within the National Park. The National Park has been designated in order to: 1. Conserve and enhance the natural beauty, wildlife and cultural heritage of the area. 2. Promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

Para/Page	Comment
	Reference should also be made to this and the SDNP's special qualities.
	Neighbourhood Plan Policies
Policy H4 P29	<p><u>Affordable Housing</u></p> <p>The policies on housing are generally welcomed, however affordable housing thresholds are now set by Government through the National Planning Policy Guidance and translated locally into the Arun Local Plan for the area within Arun Planning Authority, and by the emerging SDLP for the areas within the SDNP (policy SD24), so there is a need to consider whether there is anything that can be added by the ANDP, or will this be merely repetition.</p> <p>The threshold defined in Policy H4 is currently inconsistent with emerging policy SD24 and national guidance, and if the policy is retained, it should include lower thresholds in the SDNP.</p>
Policy H6 p30	<p><u>Windfall Sites</u></p> <p>Clearer definition could be given to the phrase 'the...<u>role</u> of the settlement'</p>
Policy EH10 p37	<p><u>Unlit Village Status</u></p> <p>Further information is required to explain the implications for future planning applications. The policy should be reviewed in light of emerging SDNP Local Plan Policy SD9: Dark Night Skies, and the newly designated International Dark Night Skies Reserve. The meaning and source of Unlit Village Status is queried.</p>
Policy GA p42	<p><u>Quiet Lanes</u></p> <p>West Sussex County Council in its recent response to the Findon Neighbourhood Development Plan made the following comments in relation to Quiet Lanes: 'It is unclear as to why this policy includes the proposal to designate several roads in the parish as Quiet Lanes. Any proposal for this legal status would need to be supported by sufficient evidence. It is suggested that this policy is removed; if it is to be retained then it could be stated in a 'community aspirations' section.'</p> <p>Contact WSCC Highways to confirm procedures needed in order to designate Quiet Lanes as this does not fall within planning jurisdiction.</p>
Policy EE7 p45	<p><u>Rural Buildings</u></p> <p>We recommend that this policy also seeks to <u>enhance</u> archaeological, architectural, historic or environmental features where possible, in line with the Purposes of the National Park.</p> <p>The policy should also include a provision to protect the amenity and activities of neighbouring properties.</p>
P50	<p><u>Background Documents</u></p> <p>Reference should also be made to the SDLP Preferred Options document</p>
Schedule D P65	<p><u>Buildings and structures of character (Existing)</u></p> <p>It would be helpful to include information about the siting of these.</p>

Para/Page	Comment
Schedule E P66	<p data-bbox="331 212 913 244"><u>Buildings and structures of character (Proposed)</u></p> <p data-bbox="331 252 1827 284">It would be helpful to include selection criteria and supporting evidence for why these additional buildings have been selected.</p> <p data-bbox="331 292 2065 432">We would query whether these buildings been considered against the criteria set out in the 2005 Arun Supplementary Planning Document? If so, how come they were not included in the original exercise? At the very least, a brief statement of significance for each entry (expanding upon the current one-line description) and probably also a photograph of each asset – possibly provided in a separate background document – is necessary to ensure they are afforded more than just limited weight.</p> <p data-bbox="331 440 2065 539">It is not clear whether any of the proposed buildings are sited within the SDNP. For any that are, I would suggest that the proposed buildings are considered separately against the SDNPA emerging Local List selection criteria. This would provide some promise of future consistency for those entries in the context of a wider List within the National Park.'</p>
	<p data-bbox="331 563 1104 595"><u>Additional comment from the SDNPA Historic Buildings Officer:</u></p> <p data-bbox="331 603 1973 670">A lost canal crosses the southern end of the Parish as referenced in para 3.7.7. A specific Policy to protect the former line of the canal, its archaeological significance and its setting, would be a really useful contribution to the national heritage significance of the locality.</p>