

Report to	Planning Committee
Date	9 February 2017
By	Director of Planning
Title of Report	SDNPA response to Submission (Reg 16) consultation on the Lavant Neighbourhood Development Plan (LNDP)
Purpose of Report	To agree the content of the South Downs National Park Authority's (SDNPA) representation to the Independent Examiner

Recommendation: The Committee is recommended to agree the table of comments as set out in Appendix 3 of this report which will form The SDNPAs representation to the Independent Examiner of the Lavant NDP.

1. Introduction and Summary

- 1.1. The SDNPA actively promotes and supports community led plans, particularly Neighbourhood Development Plans (NDP) where growth needs to be accommodated and planning issues exist.
- 1.2. On adoption, NDPs form part of the development plan for the neighbourhood area, alongside the strategic planning policies which are prepared by the SDNPA.
- 1.3. Lavant Parish Council (LPC) is the 'qualifying body' with responsibility for preparing the Lavant Neighbourhood Development Plan (LNDP).
- 1.4. LPC submitted the plan (**Appendix 2**) to the SDNPA for examination in January 2017. A 6 week publicity period commenced on 10 January 2017 and runs until the 21 February 2017, during which time local residents and other stakeholders are invited to submit representations to the Plan's Examiner.
- 1.5. The Table of Comments (**Appendix 3**) which was prepared using input from SDNPA officers sets out the proposed representation to be submitted to the examination of the Lavant NDP.

2. Background

- 2.1. The Lavant NDP covers the plan period from 2016-2031 and has been prepared for a designated neighbourhood area which follows the Lavant parish boundary. The area was designated by SDNPA on 14 March 2013 and the area outside the National Park was agreed by Chichester District Council on 18 March 2013. The area designation map is attached as **Appendix I**.
- 2.2. Plan preparation commenced in October 2013 with an Open Meeting for all stakeholders, this was followed by several further engagement events and the publication of a Housing Needs Survey. Details are set out in the accompanying [Consultation Statement](#).
- 2.3. The LNDP has been prepared by a group of volunteers and members of the LPC. The SDNPA has supported the parish council throughout the process by attending meetings and provided feedback on proposals in line with our duty to support the preparation of NDPs.

- 2.4. Lavant Parish Council carried out pre submission consultation on a draft Lavant NDP from 10 March – 28 April 2016 as is required by the Neighbourhood Planning (General) Regulations 2012. Planning Committee considered the [SDNPA response](#) to this consultation because the Lavant NDP departed significantly from the emerging South Downs Local Plan. The SDNPA comments focused on the overall quantum of development being proposed, the individual sites and detailed policies on housing mix and parking.
- 2.5. It is considered that the Submission version of the LNDP addresses many of the issues raised previously. Most of the comments raised at this stage relate to minor corrections and amendments. There are however, a couple of outstanding more significant issues relating to sites and parking standards.
- 2.6. The submission version of the Lavant NDP has now been publicised and comments are required to be submitted to the SDNPA by 21 February 2017.

3. Submission and Examination

- 3.1. The SDNPA is required under the Town and Country Planning Act 1990 (as amended) to support communities in the preparation of Neighbourhood Development Plans, this includes taking the plan through the process of independent examination.
- 3.2. All representations made on the Lavant NDP, including those of the SDNPA, are collated by the SDNPA and passed to an independent examiner to consider as part of the examination of the LNDP. The independent examiner for the Neighbourhood Plan is required to consider whether the LNDP meets the “Basic Conditions” set out in law under the Localism Act 2011. In order to meet the Basic Conditions, a Neighbourhood Plan must:
 - Have regard to national policies and advice contained in guidance issued by the Secretary of State
 - Contribute to the achievement of sustainable development
 - Be in general conformity with the strategic policies of the development plan for the area; and
 - Be compatible with EU obligations and human rights requirements.

4. Comments of NPA on the Lavant Submission Plan

- 4.1. The SDNPA formal representation to the Lavant NDP submission consultation is set out in **Appendix 3**. The following key points and overarching issues are raised in the representation.
- 4.2. **Policy LNDP4: Delivering New Homes** – The supporting text for this policy should acknowledge the emerging strategic Policy SD23: Housing in The South Downs Local Plan which sets a housing requirement for Lavant of 20 new dwellings but allows for NDPs to plan for the need for additional housing to meet local needs. In addition, whilst the allocation of 75 by the Neighbourhood Plan seems in excess of this, it should be noted that LNDP24 (Maddoxwood House) allocated for approximately 10 homes is not in the National Park.
- 4.3. **Policy LNDP7: New Dwelling Size and Tenure** - It is recognised that this policy has been amended since the Reg 14 pre-submission consultation and the rigid housing mix has been removed. The policy now however only refers to a ‘range of dwelling sizes’ on proposals for 3 or more dwellings. There is no indication of what an appropriate range would be. The supporting text refers to a need for smaller properties and it would be helpful if the policy reflected this and also sought predominantly smaller properties.
- 4.4. **Policy LNDP19: Off Road Parking in Residential Development** – concern was raised at the Reg 14 pre-submission consultation that this policy sets stringent minimum parking standards and could lead to an excess of urbanising features and limit the areas that can be put aside for open space and landscaping. The minimum parking standards have been retained in the submission LNDP. It is suggested that the wording provides for greater flexibility and allows parking to be based on what exists in the area and what is most appropriate for the site.

- 4.5. **Policy LNDP21: Land Adjacent to Pook Lane** – previously concerns were raised about this site in relation to the impact on the Scheduled Ancient Monument. Discussions have since been held between Historic England, Chichester District Council, agents acting on behalf of the site owner and the SDNPA. We now support the allocation subject to a number of caveats set out in the policy. Comments on the impacts of the alternative football pitch have been addressed. Suggestions are made for some minor amendments to the policy criteria.
- 4.6. **LNDP22: Church Farm Barns** – additional text requiring the retention and reuse/conversion of the older flint and brick barns is welcome. The amended policy also includes consideration of views from the south, in response to comments raised by the SDNPA.
- 4.7. **LNDP23: Eastmead Industrial Estate** – previously concerns were raised regarding the loss of employment land. These concerns were reflected in the representation made by Chichester District Council. An independent Viability Assessment commissioned on behalf of the Parish Council found a negative land value when appraising options for the site which involved redevelopment for 100% employment use. However, this deficit could be overcome with help from grant funding such as Coast to Capital economic funding. The revised allocation states the mix of B1 (Business) and C3 (Dwelling houses) will be determined by a viability assessment. This should also factor in the potential to make use of grant funding.
- 4.8. Eastmead Industrial Estate was assessed in the SDNP 2015 Employment Land Review (ELR), which is the main evidence based study on employment for the National Park. The recommendation was that ‘This is a multi-user site which supports employment to the North of Chichester. The site is a reasonable quality industrial estate. Continued employment use should be supported.’ A recent site visit to support a site focused update of the ELR commented that it was a ‘busy industrial estate offering low cost accommodation to local businesses.’ The industrial estate is about 75% occupied and the main business present on the site is Leki Aviation. There has clearly been a lack of investment on the site over a number of years and access to the site off the A286 is constrained.
- 4.9. Both the existing Chichester Local Plan and emerging South Downs Local Plan policies protect existing employment sites. This is in line with the duty of national parks to seek to foster the economic and social wellbeing of the local communities within the National Park. It should be noted that the duty of the national park is pursuant to its purposes. It is a challenging juxtaposition to balance up the aspirations of the local community set out in the Lavant NDP, in particular their wish to secure affordable housing with the purposes and duty of the South Downs National Park.
- 4.10. Draft policy LNDP23 allocates Eastmead Industrial Estate for mixed use development. This would involve the demolition of the existing estate and its replacement with housing and a small amount of new employment floorspace in the form of incubator or start-up businesses. There is a shortage of start-up and incubator units across the National Park. It is unlikely that many of the existing businesses could be accommodated in these new units. The exact quantum of employment floorspace and the number of market/affordable homes would be determined by a viability assessment at the planning application stage. As this would be a brownfield redevelopment site it is likely to have higher site development costs which would impact on viability and thus the delivery of employment floorspace and affordable housing.
- 4.11. The recommendation of officers is not to object to policy LNDP23. It is a policy that has been formulated by the local community of Lavant and has strong local support. It does not set a precedent due to the individual circumstances surrounding the proposal. Subject to viability testing there will be some re-provision of small, modern employment units. The majority of businesses on site are not linked to the key sectors of the National Park’s economy namely tourism and the visitor economy, forestry and wood related activities, and local food and beverages. Eastmead does not contribute to the purposes of the National Park nor does it conserve or enhance its special qualities.

- 4.12. In terms of any detailed criteria, the policy could promote opportunities to integrate uses through vertical mixed uses: B1 on ground floor with residential above. This could also be expanded to allow for uses such as a village shop/café/community meeting spaces etc. and support ‘incubator units for small businesses’ as they would benefit from footfall. There is also a permeability issue on this site. The policy should state that any opportunities to connect/link roads north/south should be explored.
- 4.13. At this stage we have not seen further comments made by CDC. Should comments be received in time for Planning Committee an update will be provided.

5. Planning Committee

- 5.1. The Lavant NDP is being considered by Planning Committee as it:
- Proposes substantially more development than is in the emerging SDNP Local Plan.
 - It allocates land for development.

6. Next steps

Stage	Timescale & further details
Examiner appointment	By the end of the consultation period.
Examination	Depends upon other work commitments of Examiner. Examination is expected to take 7 weeks including preparation and issuing of the final report.
Examiner issues final report	The Examiner makes one of the following recommendations (date to be confirmed): <ul style="list-style-type: none"> • The Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements • The Neighbourhood Plan, as modified, should proceed to Referendum • The Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
Decision on a Plan Proposal	If time allows ¹ , Planning Committee will be asked to consider the Decision Statement which sets out the modifications to be made to the plan in response to the Examiners report.
Referendum	Subject to a successful examination and the approval of the Decision Statement, there will be a referendum when the community are asked: <i>“Do you want South Downs National Park Authority and Chichester District Council to use the neighbourhood plan for Lavant to help it decide planning applications in the neighbourhood area?”</i> If over 50% of those who vote say yes, the LNDP will be adopted by the SDNPA.

¹ Government regulations now require Decision Statements be published within 5 weeks of an Independent Examiner’s report being issued. If there is insufficient time to take the Decision Statement to Planning Committee, it will be delegated to officers.

7. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	Yes – Agreement of the Decision Statement ¹ and agreement to ‘Make’ the Lavant NDP at a subsequent Planning Committee if a referendum is successful.
Does the proposal raise any Resource implications?	<p>Yes - the SDNPA have claimed £5,000 in new burdens funding from CLG to date. SDNPA have then granted Lavant £8,275 to support the cost of preparing the NDP. In addition, the SDNPA will be able to claim £20,000 shortly to cover the cost of the Examination and Referendum.</p> <p>The cost of Neighbourhood Planning to the SDNPA is currently covered by the grants received from CLG. However there are signs that these are going to start to reduce as Neighbourhood Planning increasingly becomes part of the mainstream. Currently within the National Park the cost of producing a plan ranges from around £7,000 (including the Examination and referendum) to £80,000.</p> <p>Once a NDP is made, a Parish Council is entitled to 25% of Community Infrastructure Levy (CIL) collected from development within the neighbourhood area, as opposed to the capped 15% share where there is no NDP. The Parish Council can choose how it wishes to spend these funds on a wide range of things which support the development of the area.</p>
Has due regard has been taken of the South Downs National Park Authority’s equality duty as contained within the Equality Act 2010?	Due regard has been taken of the South Downs National Park Authority’s equality duty as contained within the Equalities Act 2010. Lavant Parish Council who have the responsibility for preparing the neighbourhood plan have also prepared a Consultation Statement demonstrating how they have consulted the local community and statutory consultees. The Examiner who assesses the plan will consider whether the Consultation Statement meets regulatory requirements.
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:	<p>Lavant Parish Council as the qualifying body with responsibility for preparing the neighbourhood plan must demonstrate how its plan will contribute to the achievement of sustainable development. This is set out in the Basic Conditions Statement. Please note that the sustainability objectives used by qualifying bodies may not be the same as used by the SDNPA, but they will follow similar themes.</p> <p>Strategic Environmental Assessment</p> <p>Lavant Parish Council have undertaken a SEA/SA in support of their NDP.</p>

8. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
The NDP does not meet the basic conditions	Low	Medium	SDNPA planning officers have been contributing to the preparation of the emerging NDP and are comfortable that it meets basic conditions. This will be tested by the examination of the plan and should issues be identified there are a number of mechanisms available through which they can be addressed.

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Appendices

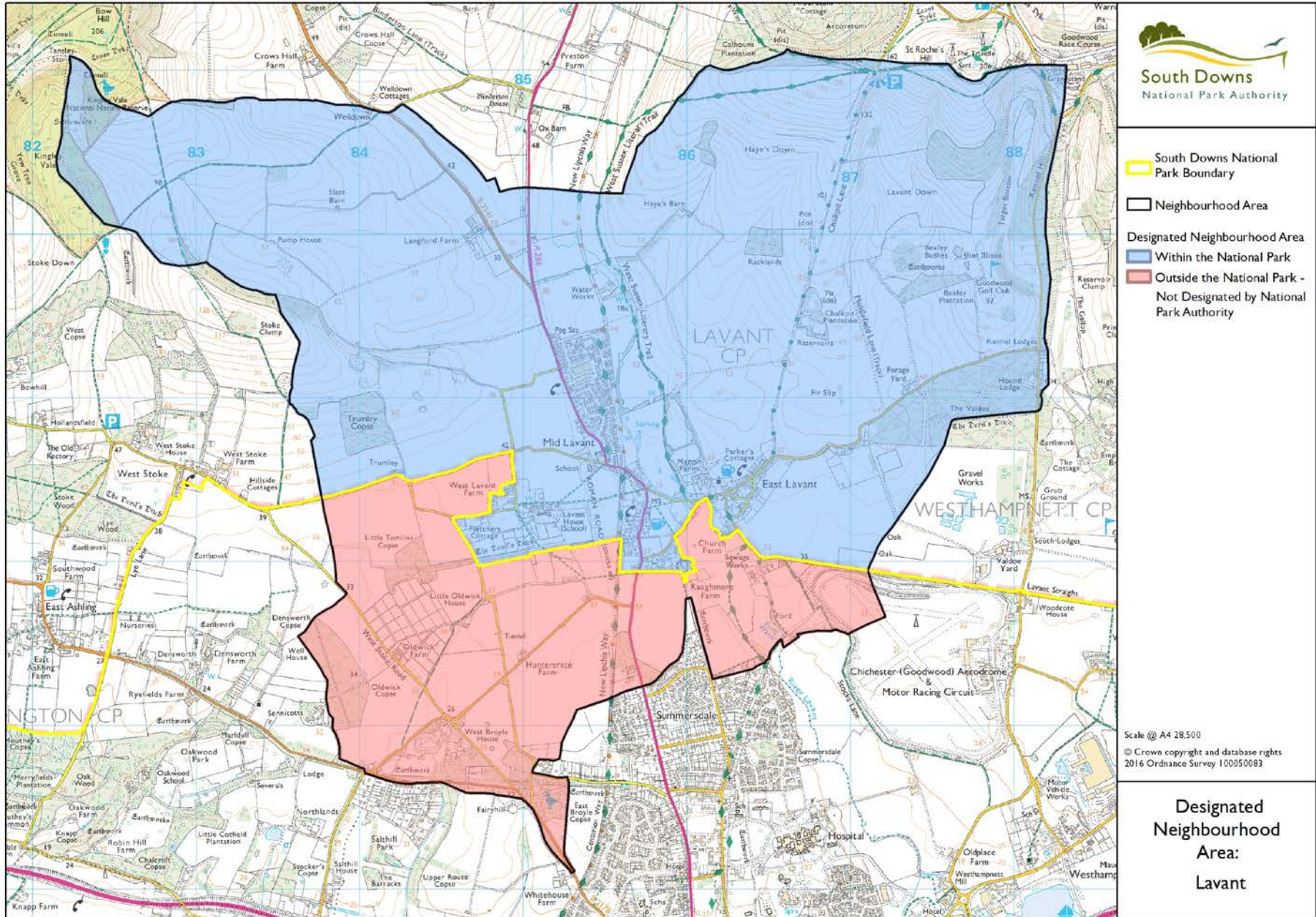
1. Lavant Designated Neighbourhood Area Map
2. Lavant Neighbourhood Development Plan – Submission version
3. SDNPA comments on the Submission version

SDNPA Consultees Legal Services; Chief Finance Officer; Monitoring Officer.

External Consultees The Submission version of the LNDP is open to anyone to comment on. The SDNPA has publicised it and circulated to all known interested parties. Officers will coordinate all the responses and forward them to the Examiner.

Background Documents [Lavant Reg 14 response from the SDNPA](#)
[Lavant Pre Submission NDP](#)
[Lavant Consultation Statement](#)

Agenda Item 14 Report PCI3/17 Appendix I



- South Downs National Park Boundary
- Neighbourhood Area
- Designated Neighbourhood Area
 - Within the National Park
 - Outside the National Park - Not Designated by National Park Authority

Scale @ A4 28,500
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Designated Neighbourhood Area:
 Lavant

SDNPA response to the Submission Lavant Neighbourhood Plan

Ref	Comment	SDNPA Recommendation to the independent examiner
General Comments		
	<p>The progression of the Lavant Neighbourhood Plan (LNDP) to submission stage is to be congratulated and is a result of a considerable amount of hard work by the parish council and volunteers. We recognise that preparing the LNDP has been a challenge at a time when adopted Local Plan policy for the majority of the Parish is largely out of date (Chichester Local Plan 1999) and draft policies for the SDNP Local Plan have been emerging.</p> <p>We appreciate that many of our comments raised during the pre-submission consultation have been addressed and we welcome this revised submission version of the Lavant NDP. Our comments at this stage largely relate to minor corrections and amendments, with just a couple of more significant issues outstanding.</p>	
1.0 Preface		
1.06	Incorrect text. There is a housing requirement of 20 new dwellings for Lavant in the emerging South Downs Local Plan.	Amend text.
1.12	Refers to the two churches being recommended for further consideration as Community Hubs (a “key objective”). This is not reflected in a policy within the NDP.	Amend text
4.24	Remove second “service” from fourth sentence	Correct typo
4.0 Spatial Strategy		
LNDPI	<p>Settlement Boundary Review</p> <p>We broadly support the proposed settlement boundary and application of the SDNPA methodology. We recommend that the settlement boundary is extended to include the site allocations where the principle of development has been established.</p> <p>The Policy refers to Site Specific Policies LNDP21-25. However, Policy LNDP 25 is not site specific.</p>	<p>Settlement boundary should be extended to include site allocations.</p> <p>Amend text.</p>
5.08	This paragraph refers to development “on the land near the SDNP”. Whilst the setting is important, the paragraph should also refer to land within the National Park itself. In addition, para 5.09 refers to “much of the parish” lying within the setting of the SDNP – but immediately contradicts itself by stating that 78% of the Parish is within the SDNP.	Amend text

Ref	Comment	SDNPA Recommendation to the independent examiner
LNDP2	<p>Policy LNDP2 – South Downs National Park characteristics of the National Park <u>and its setting</u>. In particular development should not adversely affect the <u>public views</u> towards.....</p> <p>To bring the policy in line with the National Park Purposes, the text should be amended as follows: “All development... must conserve and where possible enhance the special qualities...”</p> <p>To future proof this policy, suggest the following addition: “The assessment of development proposals should demonstrably refer to the South Downs Integrated Landscape Character Assessment 2011 <u>or subsequent revisions.</u>”</p>	Minor additional wording suggested.
LNDP3	<p>Policy LNDP3 – Local Gaps The first criteria of this policy may undermine its purpose. Suggest amending criteria 1 to state: “The open and undeveloped nature of the Local Gaps will be protected to prevent coalescence, retain the identity of separate settlements, protect their landscape setting and protect key views (A Landscape and Visual Impact Assessment must demonstrate no diminution in openness and views from the Local Gaps.)” Also recommend that ‘Land adjoining Mid Lavant, North and East of line drawn between SW boundary of Lavant Primary School and the bridge over Centurion Way’ is included within the Local Gap. The proposals for an extended car park for the village hall and replacement football pitch (policy LNDP21) will be affected as they are in the proposed Local Gap. The Local Gap policy allows for outdoor sport and recreation uses, under which the football pitch would fall. However, we recommend the criteria is extended to include ‘other community uses’ to allow for the village hall car park.</p>	<p>Amend policy criteria.</p> <p>Extend Local Gap to include land to the rear of Lavant Primary School.</p> <p>Extend acceptable uses to include community uses.</p>
LNDP4	<p>The supporting text for this policy should acknowledge the emerging strategic Policy SD23: Housing in The South Downs Local Plan which sets a housing requirement for Lavant of 20 new dwellings but allows for NDPs to plan for the need for additional housing to meet local needs. In addition, whilst the allocation of 75 by the Neighbourhood Plan seems in excess of this, it should be noted that LNDP24 (Maddoxwood House) allocated for approximately 10 homes is not in the National Park.</p>	Include details of emerging strategic policy in supporting text.
Page 23	Footnote 6 - The Assessment of Housing Development Needs Study: Sussex Coast HMA 2014, includes the whole of Chichester District	Clarification
5.19	Refers to an “evidenced number” of those in housing need, it would be helpful to include how many this is.	Amend text.
5.0	General Development Principles	

Ref	Comment	SDNPA Recommendation to the independent examiner
LNDP6	<p>Development Principles Suggest removing 'All' from start of policy to allow some flexibility in the policy</p>	Amend policy wording
Para. 6.11	This paragraph appears to be in the wrong place as it is referring to the mix of housing to meet local need which is covered by the following policy. Also the text refers to developments of 2 or more dwellings, whereas Policy LNDP7 refers to proposals of 3 or more.	Move paragraph and amend text.
LNDP7	<p>New Dwelling Size & Affordable Housing It is recognised that this policy has been amended since the Reg 14 pre-submission consultation and the rigid housing mix has been removed. The policy now however only refers to a 'range of dwelling sizes' on proposals for 3 or more dwellings. There is no indication of what an appropriate range would be. The supporting text refers to a need for smaller properties and it would be helpful if the policy reflected this and also sought predominantly smaller properties.</p> <p>Site allocation LNDP21 specifies 15 x 2 bedroom dwellings. Policy LNDP7 should state that a mix of dwelling sizes will be required unless specified as otherwise in a site allocation.</p>	Recommend amending the policy wording
LNDP8	<p>Dark Night Skies Refer to dark <u>night</u> skies in the policy</p>	Minor amendment to policy wording.
LNDP12	The wording of this policy could be clarified, firstly by referring to Assets of Community Value and by referring to 'community facilities' rather than just facilities. The title of the policy could be amended to better reflect its scope, suggest 'Retention of Assets of Community Value and Community Facilities'. There is a typo in the final sentence – "asset <u>or</u> facility..."	Amend title and policy wording
7.0	The Environment & Sustainability	
LNDP13	Biodiversity Opportunity areas – it is good to see reference to such areas within the policy. From an applicant's point of view, it would be helpful for them to know where further information on what they need to do in relation to each BOA was.	Provide further information on where information on BOAs can be found.
LNDP15	<p>Floodplain & Reducing flood risk In order to bring this policy in line with national guidance on flood risk the criteria should refer to 'outdoor recreational facilities' and remove the reference to community facilities.</p>	Amend policy wording
Map extract 3	The Core Floodplain boundary is ambiguous, a clear boundary should be provided.	Amend map, clarify boundary of floodplain.

Ref	Comment	SDNPA Recommendation to the independent examiner
8.0	Transport & Infrastructure	
Page 34	Omission of paragraph 8.07, requires renumbering from here onwards	Renumber paragraphs
LNDP19	Off-Road Parking in Residential Developments – Previously concerns were raised that as worded the levels of parking to be required are excessive and could lead to an excess of urbanising features and limit the areas that can be put aside for open space, landscaping etc. As currently written a 3 bedroom property would require we believe 4 parking spaces?	Suggest the policy is reviewed and that potential unintended consequences are considered. Suggest wording provides for greater flexibility and allows parking to be based on what exists in the area and what is most appropriate for the site.
Para. 9.14	Although Policy LNDP19 has been amended to allow tandem parking, para 9.14 still reads as if this is not the case	Amend supporting text.
Para 9.10	The South Downs Local Plan is due for adoption in 2018.	Update text.
LNDP20	Effective Traffic Management – “Development proposals that require the creation / alterations of roads shall comply with the following <u>where applicable:</u> ”	Not all will be applicable in all circumstances.
9.0	Site Specific Policies	
	Maps The site allocation maps should be annotated. It is not clear that the plan on page 55 is for Maddoxwood House. It looks like it refers to small scale housing.	Annotate maps
LNDP21	Land adjacent Pook Lane Previously concerns were raised about this site in relation to the impact on the Scheduled Ancient Monument. Discussions have since been held between Historic England, Chichester District Council, agents acting on behalf of the site owner and the SDNPA. We have no unresolved concerns subject to confirmation that Historic England are content and subject to a number of caveats set out in the policy. We recommend that the Arboricultural Survey is undertaken in accordance with BS5837 and should inform the development proposals including the point of access from the A286 (also in accordance with highways authority recommendations). Criteria 6 should allow for ‘ <u>or other suitable traffic calming measure</u> ’. Criteria 7 should state ‘ <u>the replacement football pitch shall be provided before development commences</u> ’ so there is not loss of recreational use. Suggest reference is made to dark <u>night</u> skies.	Minor amendments to policy criteria

Ref	Comment	SDNPA Recommendation to the independent examiner
LNDP22	<p>Church Farm Barns</p> <p>Previously comments were raised that the policy should explicitly require the retention and reuse of the older flint and brick barns. This has been incorporated into the policy and is welcomed.</p> <p>It would be helpful to show the proposed new footpath on the accompanying site allocation map albeit it is shown on Map Extract 5.</p> <p>The supporting text refers to the site being a brownfield site. Strictly speaking the existing use is agricultural rather than brownfield although it may meet the NDP's own definition of brownfield in the glossary. We would recommend removing reference to the site being brownfield.</p>	<p>Indicate new footpath on map.</p> <p>Remove reference to brownfield site.</p>
LNDP23	<p>Eastmead Industrial Estate</p> <p>Previously concerns were raised regarding the loss of employment land. These concerns were reflected in the representation made by Chichester District Council. An independent Viability Assessment commissioned on behalf of the Parish Council found a negative land value when appraising options for the site which involved redevelopment for 100% employment use. However, this deficit could be overcome with help from grant funding such as Coast to Capital economic funding. The revised allocation states the mix of B1 (Business) and C3 (Dwelling houses) will be determined by a viability assessment. This should also factor in the potential to make use of grant funding.</p> <p>Eastmead Industrial Estate was assessed in the SDNP 2015 Employment Land Review (ELR), which is the main evidence based study on employment for the National Park. The recommendation was that 'This is a multi-user site which supports employment to the North of Chichester. The site is a reasonable quality industrial estate. Continued employment use should be supported.' A recent site visit to support a site focused update of the ELR commented that it was a 'busy industrial estate offering low cost accommodation to local businesses.' The industrial estate is about 75% occupied and the main business present on the site is Leki Aviation. There has clearly been a lack of investment on the site over a number of years and access to the site off the A286 is constrained.</p> <p>Both the existing Chichester Local Plan and emerging South Downs Local Plan policies protect existing employment sites. This is in line with the duty of national parks to seek to foster the economic and social wellbeing of the local communities within the National Park. It should be noted that the duty of the national park is pursuant to its purposes. It is a challenging juxtaposition to balance up the aspirations of the local community set out in the Lavant NDP, in particular their wish to secure affordable housing with the purposes and duty of the South Downs National Park.</p> <p>Draft policy LNDP23 allocates Eastmead Industrial Estate for mixed use development. This would involve the demolition of the existing estate and its replacement with housing and a small amount of new employment floorspace in the form of incubator or start-up businesses. There is a shortage of start-up</p>	<p>Retain policy with recommended amendments.</p>

Ref	Comment	SDNPA Recommendation to the independent examiner
	<p>and incubator units across the National Park. It is unlikely that many of the existing businesses could be accommodated in these new units. The exact quantum of employment floorspace and the number of market/affordable homes would be determined by a viability assessment at the planning application stage. As this would be a brownfield redevelopment site it is likely to have higher site development costs which would impact on viability and thus the delivery of employment floorspace and affordable housing. We do not propose to object to policy LNDP23. We recognise it is a policy that has been formulated by the local community of Lavant and has strong local support. It does not set a precedent due to the individual circumstances surrounding the proposal. Subject to viability testing there will be some re-provision of small, modern employment units. The majority of businesses on site are not linked to the key sectors of the National Park's economy namely tourism and the visitor economy, forestry and wood related activities, and local food and beverages. Eastmead does not contribute to the purposes of the National Park nor does it conserve or enhance its special qualities.</p> <p>In terms of any detailed criteria, the policy could promote opportunities to integrate uses through vertical mixed uses: BI on ground floor with residential above. This could also be expanded to allow for uses such as a village shop/café/community meeting spaces etc. and support 'incubator units for small businesses' as they would benefit from footfall. There is also a permeability issue on this site. The policy should state that any opportunities to connect/link roads north/south should be explored.</p> <p>Minor amendment to criteria 2, change 'good' to 'goods'</p>	
LNDP24	<p>Maddoxwood House Is there evidence to support the claim that the wood could be gifted to Lavant Parish Council?</p>	Provide supporting evidence
SA/SEA		
	Previously comments were raised regarding the SA of alternatives in housing sites, this has been addressed in section 6.32.	
Habitats Regulation Assessment (HRA)		
	We have consulted Natural England on a HRA screening opinion, which screens out the need for HRA.	