

SDNPA Planning Committee 9 February 2017 Update Sheet

Agenda Item	Page No	Para	Update	Source/ Reason
3	3	Minute 238 – bullet 14 – sub bullet 3	A more robust roof light glazing condition could be added to include glazing and Monks Walk	correction
7	9	Recommendation	Recommendation: That planning permission be granted subject to a <u>Deed of Variation to be completed to amend the Site Location Plan contained in the Section 106 Agreement</u> and subject to conditions set out in Paragraph 11.1 of this report.	Update/ correction
7	10	1.4	<u>Additional sentences:</u> A completed S106 Agreement has been submitted and the SDNPA is satisfied that it will satisfactorily link the proposed development to Broadview Farm. The Agreement includes a Site Location Plan which identifies the application site, however, this plan has been superseded within the planning application. As a consequence, a Deed of Variation will need to be agreed with all parties to include the amended site location plan in the Agreement.	Update/ correction
7	6	6.1	<u>Additional detail to include in the summary of representations received:</u> <ul style="list-style-type: none"> • Proposals and recommendation contradict officer's considerations of previous application proposals and advice. • Should be good separation between the café/farm shop and agricultural buildings. • Management Plan vague and inadequate and irrelevant if agricultural activities cease. • Conflict between the proposed uses and farming activities on site in regard to accessibility of the lodges and visitor safety. • Harmful noise impact from the development. • Concern of hazardous materials stored on site. • Impact of operating hours of café/shop. • Visual impact of the development. • Concern that the lodges could become dwellings over time. • The farm shop/café originally proposed to serve the accommodation but with a reduced number of units this no longer required. This building would serve/encourage other visitors to the site. • The farm could be sold once the development is completed. Include a requirement that if sold within 10 years the site should be returned to agriculture. • The area is not a tourist destination and no onsite amenities that visitors expect. 	Update

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			<ul style="list-style-type: none"> • Interpretation of Local Plan policy C13 contradicts considerations/decision of previous application in regard farm diversification and the siting/design of the lodges, with limited additional justification being provided in the application. • Contrary to policy C13 in regard to landscape impact and traffic generation. • The Applicant has no history of farming and involvement relates to leasing the land. • Contrary to policy CP6. Not been demonstrated how the proposals conform with a diversification scheme to support agriculture and the continuation of sheep farming long term; proven the viability of the holding is in question given insufficient evidence, income, and tenant farmer responsible for upkeep; engagement of sustainable land management is questionable; impact on rural character and opportunities for recreation. Insufficient consideration by officers on these points. • Not been demonstrated the development would promote opportunities for the understanding of the National Park in a way that could not be better served by development outside of the Park (boundary within a mile away). • Insufficient justification for this type of development in this location, which could be better outside of the National Park closer to sustainable transport links. • Farm activities do not promote the understanding and enjoyment of the National Park. • Concern that the S106 legal agreement will not secure the uses to the farm for the long term and agricultural activities continuing. • The re-wilded area not intrinsic to the proposals and objectives for it in the management plan too vague. It is a SINC where there is already a duty of stewardship. <p><u>Parking and access</u></p> <ul style="list-style-type: none"> • Previous applications refused because of overspill car parking. • No footway or lighting proposed along the access and concern for visitor safety. • No provision for motorcycle parking. • Potential for informal parking on the field and on verges.-as experienced around Alice Holt. • Scale of the access and lack of detail eg.kerbs. • No provision for staff parking or for service vehicles, which compounds the issue of insufficient parking. • No disabled access to the lodges. • Turning area in farmyard for large/emergency vehicles would encroach into the existing barn. • Parking along the access road will restrict access for large service vehicles, farm machinery and emergency services and will have a negative impact on the landscape. <p><u>Design/landscaping</u></p> <ul style="list-style-type: none"> • Design of lodges seek to reduce paraphernalia but café use likely to extend outdoors adding to visual impact. 	

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			<ul style="list-style-type: none"> Lodges better placed further away from Broad View Cottage as have a negative impact on this property. No lighting proposed within the area of the cabins which affects accessibility. Landscape plan totally inappropriate and lacks detail. Eg. close boarded fence proposed to be used at the car park. <p><u>Application process</u></p> <ul style="list-style-type: none"> A number of conditions do not meet the tests in legislation. <p><u>Footpath</u></p> <ul style="list-style-type: none"> Proximity of the lodge buildings and associated paraphernalia to the new route would diminish the feeling of tranquillity within the rural landscape and harm the amenity of the footpath. Diversion conflicts with the second national park purpose. The proposed new boundary hedge alongside the footpath would introduce an artificial and urban characteristic to a rural landscape. 	
7	14	9.4	<p>Correction:</p> <p>The 29 spaces proposed in front of the café/farm shop would be the same amount of parking as proposed in the previously refused scheme (see Appendix 2, page 10, paragraphs 2.1 and 2.2) but in that application a separate area of additional parking was also proposed between the site access and the new barn was proposed. This had 11 further spaces to serve the development and it was located in the southern corner of the field adjacent to the industrial estate. Concerns about landscape impact of this separate parking area were raised during the determination of that application.</p>	Clarification
7	17	9.25	<p>A S106 Agreement which ties the proposed uses to the farm has been completed. The SDNPA is satisfied that its wording would ensure that the proposed uses form part of a diversification scheme which supports sheep farming. It outlines that the applicant will not:</p> <ul style="list-style-type: none"> Sever the legal ownership of the barn and tourist accommodation or any parts thereof from the farm. Create any legal interest in the barn and tourist accommodation or any parts thereof from the remainder of the farm. 	
7	18	11.1	<p>Amendment:</p> <p>The grant of planning permission be granted subject to a Deed of Variation to be completed to amend the Site Location Plan contained in the Section 106 Agreement and subject to conditions set out in Paragraph 11.1 of this report.</p>	Update/ correction
7	20	Condition 14	Amendment to condition:	Update/

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			<p>No development shall commence on site until details of a scheme to prevent surface water from the site discharging on to the adjacent highway have been submitted to and approved in writing by the Local Planning Authority. The proposed hard surface/s shall either be made of porous materials or provision shall be made to direct run-off water from the hard surface/s to a permeable or porous surface within the site. The development works shall be carried out in accordance with the approved details before any part of the development is occupied and shall be retained thereafter.</p> <p>Reason: To ensure adequate provision for surface water drainage and avoid discharge of water onto the public highway, in accordance with policy CP31 of the East Hampshire District Local Plan Joint Core Strategy 2014 and NPPF.</p>	correction
7	21	Condition 18	<p><u>Delete condition:</u> No development shall be commenced until the diversion of the public right of way, Binsted Footpath 55, is completed, to the satisfaction of the Highway Authority.</p> <p>Reason: To ensure that the re-routed footpath is appropriately designated and to ensure highway safety, in accordance with policy CP31 of the East Hampshire District Local Plan Joint Core Strategy 2014 and NPPF.</p>	Deletion
9	58	Section 3	<p>Additional paragraph below paragraph 3.6: 3.7 In addition to the applications for planning and listed building consent stated, the following applications in respect of discharging conditions have been approved: SDNP/13/01165/DCOND: Application to discharge conditions 3, 4, 5 and 7 of application BH2012/00717. Approved 30 April 2013. SDNP/13/01118/DCOND: Application to discharge conditions 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12 of application BH2012/00718. Approved 30 April 2013. SDNP/14/00101/DCOND Discharge of condition 4 (contamination remediation) of application BH/2012/00717. Approved 29 August 2014. SDNP/14/02183/NMA: Non-material amendment to application BH2012/00717. (Alteration to a window). Approved 5 September 2014.</p>	Update
9	59	5.2	<p>1 additional objection received which raises the following:</p> <ul style="list-style-type: none"> • The works undertaken have caused harm to the character of the listed building, • The applicant has not produced any evidence to justify the works. • The applicant failed to notify that Local Planning Authority being taken authority as soon as reasonably practicable. <p>A separate recent communication alleges the destruction of bat roosts when roof alterations were undertaken, this matter lies outside of the scope of the application and will be followed up separately.</p>	Update

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9	8	8.10	<p><u>Additional sentence:</u> The applicant's agent has confirmed that all residents of the converted stables block will be provided with keys to enable them to access the proposed cycle store.</p>	Update
10	66	2	<p>The applicant has submitted comments in response to the committee report. This response provides amplification on the activities as well as indicating possible changes to the proposals. The following has been outlined:</p> <p><i>'The weight given in the report to the true facts on the historic use of the site</i></p> <ul style="list-style-type: none"> • <i>Application documents describe the historic use of the land for recreation in detail</i> • <i>The case officer's report does not acknowledge the historic land usage on the site and the matter has not previously been raised by case officer with the applicant</i> • <i>CDC determined in 2012 that the field archery is a historic activity now immune from enforcement</i> • <i>Traffic, parking and associated impacts of historic land use are not a consequence of the proposals</i> • <i>Such impacts are included so that the totality of cumulative impacts on the site can be assessed</i> • <i>Significant mitigation and control of these pre-existing impacts are included in the proposals</i> <p><i>The schedule of activities in the proposals</i></p> <ul style="list-style-type: none"> • <i>Range of activities reflects commitment to three founding principles of sustainable communities</i> • <i>Activities now categorized more simply for easier scheduling of activities and greater control and mitigation of potential adverse impacts</i> • <i>Field archery still limited to Sunday daytime only and confirmed as the only recreational activity</i> • <i>Tourism is limited to the April-September season only</i> • <i>Woodland Training courses confirmed as limited to only 6 occasions p.a. for 3-5 days</i> • <i>Life-long learning activities restricted to daytime only, 2 weekdays per week, over 42 weeks p.a.</i> • <i>The activity changes now severely restrict scope for overlapping of activities</i> <p><i>Addressing potential impacts on amenity of the neighbourhood and rural character</i></p> <ul style="list-style-type: none"> • <i>We acknowledge consultee support of the project on design, landscape, ecology, health, disturbances, and road safety in the submitted proposals, which have now been considerably constrained to address potential impacts further</i> • <i>We acknowledge acceptability of each activity individually stated in the report and note concern for the totality of impacts</i> • <i>We acknowledge the primary concern is over transportation impacts on neighbourhood and propose significant mitigation and reductions to address this</i> 	Further information

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			<ul style="list-style-type: none"> • We note misunderstandings in report over predicted vehicle numbers and attempt to correct this, demonstrating significantly lower numbers are predicted even in worst case scenarios • We propose decrease overnight accommodation by 1/3 to reduce traffic and parking impacts • Reducing number and frequency of activities greatly will avoid significant adverse impacts • Activities will avoid unsociable hours • We clarify that Tourism and Training activities make use of the same accommodation, so no overlapping traffic impacts possible • Life-long learning activities will not overlap with recreation activities • Life-long learning activities can be scheduled outside dates for tourism or training courses • Overflow parking now required on Sundays only and only if archery members require more than 8 cars or if tourists are occupying all accommodation on site over daytime on Sundays. ‘ <p>Members are reminded that the application is to be determined as presented in the application and to which the report refers. The above information and alterations are therefore not for consideration. Further advice will be provided at the meeting.</p> <ol style="list-style-type: none"> 1. The applicant was advised in 2012 that it may be possible that the use of the site by the archery club could be regularised by applying for a Certificate of Lawful Existing Development. No such application has been received. 2. The use which at the present time can be said to be lawful is forestry and the reference to ‘Traffic, parking and associated impacts of historic land use’ must be to that use, traffic movements in connection with forestry are low key. 3. The applicant in this submission has further changed the frequency of activities from those previously referred and appears to indicate that the camping and overnight shelters could be reduced by a third from that shown in the application. 4. A ‘no objection’ response from consultees does not constitute support and in regard to road safety the Highways Authority have raised an objection. 	
10	68	Section 4	<p><u>Additional comments received:</u></p> <p>Highways Authority: Objection subject to more information being submitted on the grounds that the applicant has not satisfactorily demonstrated that a safe and sustainable access can be achieved in accordance with the requirements of paragraph 32 of the National Planning Policy Framework. Concern is raised about the following:</p> <ul style="list-style-type: none"> • The access is not wide enough to accommodate two way traffic; which at busy times could cause waiting in the highway • Visibility from the access is below the DMRB guidance for visibility splays in 60mph roads. • Question the adequacy of the proposed parking with the site. 	Update

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			<ul style="list-style-type: none"> <li data-bbox="712 248 1160 280">• Adequacy of the Draft Travel Plan 	
10	68	Section 5	1 additional representation in support and 1 further objection have been received. These raise no new material matters to those already included in the report. In addition a local resident has submitted photographs showing parking on the site spilling over from the informal parking area.	Update
10	78	11.1	<p data-bbox="595 440 1637 472">Additional reason for refusal in response to the objection from the Highway Authority:</p> <p data-bbox="595 491 1872 587">3. It has not been demonstrated that safe and sustainable access can be achieved in accordance with the requirements of paragraph 32 of the National Planning Policy Framework and the proposal falls contrary to saved policy TR6 of the Chichester Local plan 1999.</p>	Update
11	88	5.6	<p data-bbox="595 616 1917 679">The Ditchling Society's comments were among the public representations contained in the report but the following is a specific summary of theirs:</p> <p data-bbox="595 703 1234 735">Letter of objection – The Ditching Society.</p> <p data-bbox="595 743 1917 919">The site is strategically important last undeveloped green space separating the Distinct villages, Ditchling is a conservation area. In accordance with 95% of respondents' wishes, The Beacon Parishes Neighbourhood Plan contains Conservation policies (Cons12 & 13) to protect this gap in line with SDNPA aims and LDC Joint Core Policy 10. The SDNPA landscape officer objected to formalisation of this land in the previous application.</p> <p data-bbox="595 943 1917 1086">Inaccuracies in the Transport Statement: nearest public transport is in fact Hassocks Station (25 mins walk) and bus Stonepound Crossroads (35 mins walk) The Cricket Club has only parking 21 'all-weather' parking spaces, which could not accommodate the anticipated 58 two way car journeys on a busy match day. The cricket club is not a commercial use.</p> <p data-bbox="595 1110 1514 1142">The application states no built structures, but rugby posts are included.</p> <p data-bbox="595 1166 1906 1270">Community amenity: it is said to meet local and community need. However the land is now privately owned; benefits are for a specific club with very few members from the village. Not backed by wider community.</p> <p data-bbox="595 1294 1872 1358">Drainage & Ecology: Drainage is on three sides of the field carrying excess water from the fields to the south and scarp and is constantly waterlogged during winter. Unsuitable for playing on.</p> <p data-bbox="595 1382 1895 1445">Ecology. The site used for sheep grazing, hay and silage for many years but has already been sprayed and mown. Proposed levelling will be detrimental to the natural environment.</p>	Insertion.

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			<p>Considerable unease about future development ambitions and implications following previous application for two pitches and car park. Land owned by developer who may in due course benefit from change of use.</p> <p>Noise and disturbance: already heard from cricket club during summer months. Rugby matches on Saturdays and Juniors on Sundays plus training days will impact local residents.</p> <p>The society joins objections from Parish Council, Neighbourhood Plan Project Group and South Downs Society, asking to reject the application.</p>	
11	86 & 93		<p>A further letter of objection and correction received. - Horrified that rugby associated people might use the lane for access and implied parking. This would be totally unacceptable. The Drove is a private lane, with restricted vehicular access and parking maintained by occupiers of Drove Cottages. They should use the parking area at the cricket ground and walk across the field. We ask that parking is restricted to the cricket club car park only. Officer comment: At 8.40 of the report, the comment '<i>some spectators and players may choose to access the site via the access track</i>' was not intended to imply that this could be used as vehicular access in connection with the proposed pitch, only by those arriving on-foot.</p> <p>Representations:</p> <p>Bullet 11. omits the word "hear" " Residents can <i>hear</i> cricket matches/socials"</p> <p>Bullet 15. "Levelling and draining will increase run off into the nearby stream".</p> <p>Objector adds – a number of objectors have stated that this already contributes to flooding in Beacon Road Ditchling and Lodge Lane Keymer.</p> <p>The comment in letters of support that the land has not been productive for 10 years is inaccurate; the objector comments that it has been annually mown for hay and silage and used as sheep pasture during 42 years.</p>	Additional comments and correction
11	93	8.37 – 8.39 and Condition 4, page 95	<p>Drainage:</p> <p>Pitch: The applicant has stated that a 'mole' plough would be used, to improve drainage of the proposed rugby pitch. This is a narrow gauge tractor-mounted 'tyne' which is used to break through the underlying "pan" and to create fissures / cracks to facilitate vertical water percolation. 'This is a normal agricultural operation, routinely carried out in the summer when the ground (especially clay) is hard and the fissures are consequently larger. This system is regularly employed on sports pitches'.</p>	Additional information and amended condition

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			<p>The operation does not disturb existing levels, nor is there any sign of the work once it has been completed'. He adds that due to narrow gauge, this this can be repeated without disrupting the surface of the pitch.</p> <p>Car Park: For the existing cricket-club car park officers have considered whether an active drainage system is desirable, along with possible mixing-in of a proportion of aggregate to maintain a more resilient grass surface, possibly using a cellular mesh at the surface. In response, the agent, whilst not specifically confirming agreement to this, and mindful of costs of drainage work relative to a temporary planning permission has stated: 'I am sure we will be able to satisfy and discharge a condition to refurbish the car park area to a specification acceptable to the National Park Authority'.</p> <p>The National Park Ranger is satisfied that this approach to the pitch and car park is reasonable for the purposes of a temporary approval.</p> <p>The agent also states that boundary ditches will be regularly inspected and maintained to ensure they flow freely. 'They will be inspected before the start of each rugby season and any necessary cleaning of vegetation and silt will be undertaken as required'.</p> <p>In the view of officers, these matters can be dealt with within the scope of condition 4 (page 95) subject to the insertion of a new clause b) and renumbering clause b to c with additional text. The condition would read as follows (changes in italics):</p> <p>Condition 4</p> <p>1) No development shall take place unless and until:</p> <p>a) A detailed assessment of ground conditions of the land proposed for the new playing field land as shown on drawing number BAC-DIT-LV-004 has been undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and</p> <p>b) <i>A detailed assessment of ground conditions of the existing cricket club car park has been undertaken (including drainage and topography) to identify constraints which could affect car parking; and</i></p> <p>c) Based on the results of the assessment pursuant to (a and b) above, a detailed scheme and timetable for its implementation, to ensure that the playing field <i>and car park</i> would be provided to an acceptable quality (including adequate drainage: conditions and capacity), and proposed arrangements for its <i>establishment of the pitch and drainage</i></p>	

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			<p><i>works to both the pitch and car park and subsequent maintenance (including drainage maintenance), shall be submitted to and approved in writing by the Local Planning Authority in consultation with Sport England (such consultation relating to the sports pitch). The development shall only be carried out in accordance with the approved scheme and timetable and shall be maintained in accordance with the approved maintenance details for the duration of this temporary planning permission.</i></p> <p>Furthermore, level changes for the creation of the pitch hereby approved shall not exceed +0.5m and -0.3m height unless the Local Planning Authority gives prior written approval for any minor variation, and shall be blended with the adjoining natural contours.</p> <p>Reason: To ensure that further survey work is undertaken and that detailed design, methods of establishment and drainage of the pitch and car park are provided and implemented in the development and its maintenance, to minimise its visual impact in this important pastoral landscape, and that drainage is maintained.</p>	
11	93	8.44	<p>Biodiversity:</p> <p>The National Park Ranger has confirmed that bird and bat boxes could be located discreetly within trees at the site without visual intrusion.</p>	Update
11	95	Condition 7	<p>After 'carried out', add: '<i>nor shall there be any amplified sound, including any public address system or use of loud-hailer</i>'</p> <p>Reason. add: '<i>and to safeguard neighbouring amenities</i>'</p>	Addition
12	105	Community Infrastructure Levy part of Local List	<p>Amended requirement for wider selection of applications to submit CIL Forms</p> <p><i>All householder, minor and major applications (including S73 applications), prior approvals for change of use to residential and existing lawful development applications.</i></p> <p>Reason: This amendment is recommended to align with the requirements set up with the Planning Portal and to ensure all information is captured at validation stage to enable the Authority to identify CIL liable applications and for the applicant to apply for exemption where necessary.</p>	Correction

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13	128	New paragraphs to be inserted after para 2.2	<p>The policies being presented to Planning Committee today are one of several tranches of Local Plan policies that have been considered by Members. It is relevant to note the following extract from the Introduction of the Local Plan, which was endorsed by Planning Committee on 10th March 2016: <i>It is important that the plan is read as a whole. All Local Plan policies should be viewed together and not in isolation in the preparation and consideration of planning applications. All development plan policies will be taken into account in determining planning applications, along with other material considerations. The policies in this Local Plan do not list or cross-reference to all other policies that may be relevant.</i></p> <p>It is also relevant to highlight the wording of Local Plan policies and the extent to which they should be positively or negatively worded. This is a matter on which the NPA has sought two sets of legal advice, which have been discussed in detail with members at Local Plan Members Working Group. The first set of legal advice was to word policies in positive terms and to use negative wording where necessary to reflect national policy or provide clarity. The use of negative wording was considered particularly appropriate for purpose 1 policies relating to the natural beauty, wildlife and cultural heritage of the National Park. The second set of legal advice provided an opinion on specific draft policies, for example, it advised that the use of the word ‘only’ was defensible in policy SD5 on landscape character as it was linked to the first purpose of national parks.</p> <p>The first set of legal advice also suggested revised wording for the first policy of the Local Plan, which is a core policy on sustainable development in the South Downs National Park.</p> <p>Core Policy SD1: Sustainable Development</p> <ol style="list-style-type: none"> 1. When considering development proposals that accord with relevant policies in this Local Plan and with National Park purposes, the Authority will take a positive approach that reflects the presumption in favour of sustainable development. It will work with applicants to find solutions to ensure that those development proposals can be approved without delay, unless material planning considerations indicate otherwise. 2. The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park. 3. When determining any planning application, the Authority will consider the cumulative impacts of development. Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally: 	

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			<p>(1) the benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and</p> <p>(2) there is substantial compliance with other relevant policies in the development plan.</p> <p><i>Supporting text</i> <i>This policy reflects the three guiding principles of this Local Plan: i) the presumption in favour of sustainable development set out in the National Planning Policy Framework; ii) the statutory duty of the SDNPA to have regard to National Park purposes when determining planning applications; and iii) the great weight to be attached, in the determination of planning applications, to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.</i></p> <p><i>These three principles are reflected in the policies that appear throughout the Local Plan.</i></p> <p><i>On adoption, the South Downs Local Plan will form part of the statutory development plan for the whole of the National Park, along with the minerals and waste plans and 'made' (adopted) neighbourhood development plans. The planning system in England is plan-led. By law, decisions on planning applications must be taken in accordance with the development plan unless material planning considerations indicate otherwise. It is implicit within paragraph 1 of Policy SD1 that if a development proposal does not comply with key policies in the development plan, then it will be contrary to the development plan, and may therefore be refused."</i></p>	
13	186-200	All indicators marked with a cross symbol	Insert footnote at the bottom of each page where such indicators occur, stating 'Further work is underway on how to monitor other potential indicators that are more closely aligned with National Park purposes'	Addition
13	170	Supporting Text following policy SD29	Delete paragraph, replace with: The purpose of this strategic policy is to identify a hierarchy of existing town and village centres across the National Park. This is based on evidence of the current state of the market town centres and village centres, their realistic role and function, and how they relate to those centre outside of the National Park. The establishment of a hierarchy of centres allows their relative positions to be monitored and if a centre is in decline it enables strategies to put in place to either rejuvenate or manage that decline positively.	Clarification
13	170	Policy SD30 (5)	Within the smaller village centres, development proposals for retail purposes will be permitted where they are <u>compatible with its historic nature and</u> of a scale appropriate to the community they sit within,	Addition
13	179	Strategic Policy SD42: Infrastructure	Amend supporting text as follows:- A live document known as The Infrastructure Delivery Plan (IDP) sets out existing infrastructure deficiencies and what is required to support sustainable development in the plan period. Given the	Clarification

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			<p>limited level and scale of development in the National Park and that most of the local infrastructure is owned and/or managed by other local authorities or service providers, the National Park Authority will need to work with partners to ensure that infrastructure is identified and prioritised appropriately with regard to the spending of CIL. and review the IDP periodically to inform its position on the spending of CIL. For example, the SDNPA will publish an up-to-date Regulation 123 list to clearly define what infrastructure is to be provided through either planning obligations or CIL.</p>	