



Summary of Representations made on the Regulation 16 Submission version of the Patching Neighbourhood Development Plan (PNDP)

1. This document provides a summary of the representations submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 to the Patching Neighbourhood Development Plan (EMNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. The South Downs National Park Authority (SDNPA) published the PNDP for consultation from 12 June 2017 to 24 July 2017 in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012. Representations were submitted during the publicity period by 6 respondents. The representations were received from statutory consultees, developers, their agents, individuals and other organisations.
3. Paper copies of the representations can be viewed on request at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH.
4. Set out below is a summary of the issues raised in the representations. The South Downs National Park Authority Representation can be seen in full on our website.

Reference	Name / Organisation	Date received	Method of submission	Summary of representation
R1	Mr Robert Besford	24/07/2017	Email	<p>Local housing needs were objectively assessed and determined in two surveys (Spring 2015 and February 2017), resulting in the community expressing a housing requirement, especially for market housing to meet challenging needs. A policy was incorporated during the pre-submission draft, to contribute to the small number of needs for the supply of new dwellings over the 15-year period. The SDNPA indicated qualified support for this, as well as conforming to national policies and our Local Plans to strengthen the PNDP.</p> <p>However, the policy was dropped to meet local needs by assisting and supporting the provision of housing because of administration burdens. Objectively assessed housing needs should have a regard for conserving landscape and scenic beauty. First occupations could restrict new housing developments by those with qualifying local connections, subsequently time-limiting resales to the eligible households (approx. 100 households in the parish), before being offered on the open market. Strictly controlled development has been supported by the parish for the continuation, especially after being exercised for so many decades. Sustainable development will be achieved by the small number of dwellings included and the village being in a suitable</p>

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				location, being near the crossroads of the A27 trunk road and the A280.
R2	Mr Robert Lloyd-Sweet on behalf of Historic England (HE)	24/07/2017	Email	<p>HE do not have any objections to the plan's elements and praised the Steering Group on developing the PNDP with considerable awareness and sensitivity to the historic environment of the parish. Recommendations were also considered during the Reg I4 consultation stage and accommodated by these several amendments.</p> <ol style="list-style-type: none"> 1. Policy Places- HE supports especially a list development of the local merit archaeological sites and non-designated heritage assets. Suggested an archaeological notification area map extract held by the West Sussex Historic Environment Record to be included in the NDP, showing a illustrative knowledge of when the plan is compiled. 2. Second paragraph of the policy- Both designated and non-designated heritage assets were similarly considered. HE says heritage assets are given more protection than the NPPF (they suggest only designated heritage assets to be conserved and non-designated to be weighed against the deliverance of public benefit development). 'Exceptionally' permitted only when a development results in substantial harm or loss of a designated heritage asset. Greater weight to the protection of designated heritage assets is suggested, whilst simultaneously providing an appropriate protection to non-designated identified through the plan-making process. Following wording suggested to replace the second paragraph of the policy: "Great weight will be given to the conservation and enhancement of these designated heritage historic heritage assets. Development proposals causing any harm or loss to these heritage assets, including those identified on Map 4, will require clear and convincing justification. Accordingly, development proposals which adversely impact on the continued preservation, conservation and use of these assets will only be permitted in wholly exceptional circumstances where:" 3. Final paragraph- HE described that a designated heritage asset which is lost or substantially lost, is unlikely to be permitted in the neighbourhood plan area and providing limited opportunity to provide public benefits of a scale to justify such harm- providing clear guidance and retaining the community's desire of the neighbourhood level matters. 4. Policy Places 2- HE meritly supports to enhance the conservation area with undergrounding overhead wires. Clarity to aid decision making with the following wording: "Proposals that would enhance the character or appearance of the conservation area,

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				<p>including ‘undergrounding’ overhead power and telephone cables, will be supported.”</p> <p>5. Policy Places 8: Equine development- HE supported and expressed with taking a positive and measured approach to manage the impact of equine development, in the South Downs historic landscape.</p>
R3	Mr Richard Franklin on behalf of Highways England	18/07/2017	Email	No comment
R4	Mr Richard and Mrs Helen Mason	23/07/2017	Email	<p>They commented on the amendments enhancing the plan and now how it is useful to guide the Parish’s future development but still one correction to make:</p> <ul style="list-style-type: none"> • Map 4(c)- Flint and Brick Walls- Patching, The Street, No. 1 and No. 2 – Shows a section of the flint wall extending patially along the boundary of their garden (Glebe House), which doesn’t exist as the flint wall stops at the boundary
R5	Ms Louise Diez on behalf of Natural England	24/07/2017	Email	No comment
R6	South Downs National Park Authority	12/07/2017	Email	<ol style="list-style-type: none"> 1. General- Consistency of the term ‘South Downs Local Plan’ (SDLP) to be referenced correctly in the PNDP and used in the place of the multiple ‘South Downs National Park Local Plan’ and ‘South Downs National Park Plan’ references. The emerging SDLP references will change as it is modified and updated. 2. General- PNDP policies have been prepared in consideration of the SDLP forthcoming policies, with a result of these being referenced in the NDP. The often policy numbering will be affected and some may be incorrect due to the progression of the emerging and changing SDLP, however the policy titles may be retained. It may not just change at examination but it also may change at adoption. 3. Introduction 1.4 and Para 3.9- PNDP’s time period to extend to the end date of 2033, same as the SDLP (2014-2033). 4. COMMI: Protection of assets of community value- Policy wording to refer to ‘registered Assets

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				<p>of Community Value’ but to bear in mind Arun District Council are responsible for the register of assets of community value. Patching Parish Council can nominate land and buildings to this register.</p> <p>5. PLACES I: Historic Buildings- Clarity is needed with reference to Maps 4(b) and 4(c) on the Local List and should be inserted into this policy. If they are identified a potential candidates in the selection process, it would be premature as the Local List would need to be based on a rigorous one and using pre-defined criteria, with the reasons for inclusion clearly set out with regard to those criteria.</p> <p>6. PLACES 4: Design of new development- Policy wording should be amended to refer to ‘where a Design Access Statement is required...’, as not all development applications require one.</p> <p>7. PLACES 5: Conservation and enhancement of the natural environment- The HRA will assess the potential impacts of the PNDP on international designated wildlife sites. The screening statement supporting text illustrates no significant effects will be likely to emerge from the PNDP proposals, in relation to the integrity of the Arun Special Area of Conservation (SAC) and other ‘international conservation designations’. The SAC was subject to a number of recommended amendments. Reference of ‘international nature conservation designation’ to be incorporated as well as the following paragraph: <u>‘An area of the Arun Valley north of Patching is protected by three international nature conservation designations: The Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. The Arun Valley SAC/SPA/Ramsar site is vulnerable to changes in both water quantity (for example through abstraction of water) and water quality (for example, outputs from wastewater treatment works). Development proposals must ensure that they would not result in adverse impacts on the Arun Valley SAC/SPA/Ramsar.’</u></p> <p>8. PLACES II - Lighting in new development- SDNPA welcomed the references to the International Dark Skies Reserve and considering this policy with the emerging SDLP policy approach. SDNPA supports and no comments were necessary.</p> <p>9. HBTI- New residential development- SDNPA understands the Parish Council have sought additional evidence and provided considerable thought, supporting a policy approach resulting in accommodating people with exceptional housing needs and clear local connections. The Parish Council considered this policy is too complex and would require an administrative capacity they do not have to implement it. It resulted in a ‘local needs’ exception to be removed from this submitted policy. They</p>

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				<p>also commended the Parish Council's efforts in an innovative policy approach being developed and explored, as well as acknowledging the policy implementation difficulties. SDNPA supports and no comments were necessary.</p> <p>10. HBT2: Sub-division of residential gardens- Similar to in regards to the HRA screening statement in PLACES 5 and the undertaking of an HRA, to assess the potential impacts of the PNDP on international designated wildlife sites. It would also be recommended to reference this section in the HBT2 section. Internal cross references are not generally recommended as the NDP should be read as a whole. If a list of cross references are to be retained, it is requested that PLACES 5 is added to this list.</p> <p>11. Appendix A. Maps-</p> <ul style="list-style-type: none"> • Title of Map 3(a) recommended to be 'Nominated' Assets of Community Value as these assets have not been registered. • Key on Map 4(c)- should be larger to ensure it is legible
R7	Ms. Charlotte Mayall on behalf of Southern Water (SW)	27/06/2017		<p>SW understands the Parish Council's desire to protect areas of open space but does not support the wording of COMM 5, as statutory utility providers such as Southern Water will be barred from delivering the essential infrastructure necessary to serve existing and planned development.</p> <p>It also doesn't meet the basic conditions for a NDP, i.e. being in general conformity with development plan's strategic policies for the authority's area, regard to national policies and advice found in the Secretary of State's issued guidance and sustainable development assessment contribution.</p> <p>Recognition of Arun's strategic policies recognizing circumstances should be highlighted in the NDP, as well as when development may be permitted on open spaces.</p> <p>Supports green spaces are valued and minimize the impact of any necessary infrastructure on value, even when they may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. Location of the infrastructure will have limited options and would need to connect into existing networks.</p> <p>The following amended wording is proposed to meet the basic conditions required for a NDP:</p> <p><i>'Existing green space to which there is public access will be protected from development at</i></p>

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				<i>the village hall grounds (See policy COMMI above and Map 3 in Appendix A), unless there are very special circumstances, for example, it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.'</i>