

## SDNPA response to Storrington, Sullington and Washington Pre-submission Neighbourhood Development Plan

The comments set out below are the South Downs National Park Officers views only under Delegated Powers.

All references to emerging South Downs Local Plan policies relate to the Preferred Options rather than any subsequent revision (unless specified). Please note that work is continuing on the emerging South Downs Local Plan. The Pre-submission version of the Local Plan was approved for public consultation by the SDNPA on 11<sup>th</sup> July 2017. The consultation on this is scheduled to start in September. All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation
General Comments	<p>The parish council should be congratulated on producing a comprehensive neighbourhood development plan (NDP). We are pleased that our previous comments made on the previous Pre-submission and Submission plans have largely been taken into account in this version of the NDP. We have however made some suggestions in the table below to help refine policies further to ensure that they respect the purposes and duties of the South Downs National Park Authority (SDNPA).</p> <p>We also set out some concerns regarding the relatively large scale allocation at Ravenscroft Allotments which immediately abuts the boundary with the National Park.</p>	N/A
Chapter 2 State of the Parishes; Introduction to the Parish of Washington	Washington is situated on the South Downs Way and with its amenities could be said to be a gateway location for this national trail, providing a public transport link and other village facilities. More perhaps could be made of this connection.	Consider inclusion of reference to Washington as a gateway location for the South Downs Way.
Policy 1: Spatial Plan for the Parishes	We have some concerns regarding the second paragraph of this policy and the bullet points associated with it, which we think are confusing. The policy states that ‘Development Proposals for infilling outside the Built –up Area of Washington will be supported, and then gives examples of the location and size of development that are included. The main settlement of Washington village is entirely within the South Downs National Park. This policy could conflict with the emerging South Downs Local Plan Development Strategy policy SD 25 which seeks to set a clear distinction between land with a settlement boundary and the open countryside. Within the settlement boundary the principle of	We recommend the removal of the second paragraph of this policy and the criteria associated with it or tighter more specific wording regarding the few locations that policy would apply and that are outside the National Park.

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	<p>new development is considered acceptable and outside of this, land is treated as countryside. This policy as it is currently worded could cause harm to the special qualities of the National Park by allowing inappropriate development in the countryside and also affect the ability of the community to deliver rural exception sites. In addition, the site at Old London Road is allocated through Policy 2, ii) so the first bullet point is a duplication and unnecessary and extensions should be acceptable both within and outside the built up area. We suggest deletion of this criteria or tighter more specific wording regarding the few locations this policy would apply that are outside the National Park.</p>	
<p>Policy 2: Site Allocations for Development iv) Ravenscroft Allotment Site, Storrington</p>	<p><b>Ravenscroft Allotments</b></p> <p>This policy has changed since the previous versions of the NDP and now proposes a much larger site for housing as well as moving the replacement allotments into the National Park.</p> <p>We appreciate that the eastern side of the site adjoins the existing built up area and that the site has the potential to deliver primarily affordable housing. However, the site is a sensitive location immediately adjacent to the South Downs National Park boundary and part of the wider setting of the historic core of Storrington.</p> <p>We have visited the site and viewed it from the top of the Downs and in particular Chantry Hill Cross Dyke, which is a Scheduled Ancient Monument and a popular public viewing spot. While the current allotments are fairly well contained in views by an existing mature boundary tree screen, the rest of the proposed site to the south is clearly open to view, comprising attractive open fields with remnants of an historic field pattern. The fields to the south of the allotments are viewed from the Downs as an attractive wedge of countryside between the settlement edge of Storrington and the South Downs National Park. They are also part of the wider rural setting for the historic core of Storrington centred around the church and St Joseph's Abbey.</p> <p>As a result of this we have concerns regarding the impacts of the allocation of this site for a high density housing scheme with no landscape buffer between it and the National Park boundary. In fact the proposed housing will project further south than the existing housing to the east and will appear to bring the</p>	<p>As the proposal presently stand we have concerns regarding the number of dwellings and number of allotments proposed at this sensitive site.</p> <p>We previously provided informal comments to Horsham District Council on an illustrative layout options for this site and advised that we preferred the previous proposal which was a smaller scheme. As the proposal presently stands we do not think that sufficient landscape and visual assessment has been carried out to: inform the design and layout of the scheme; and to demonstrate that the site has the capacity to accommodate the amount of development proposed without impacting on the special qualities of the South Downs National Park.</p>

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	<p>built form of Storrington very close to the Downs in views from the top. We also have some concerns regarding how the introduction of this amount of allotments (with associated paraphernalia - sheds, fences, car parking etc.) will impact on the special qualities of the National Park. In addition, we note that the red boundary of the site allocation is drawn around all of the land, including that where the proposed replacement allotments are to be located. This could be interpreted that the whole site is proposed for housing. It also gives the impression that the allocation has been designed to open up other parts of this area to future development.</p> <p>We previously provided informal comments to Horsham District Council on illustrative layout options for this site. We advised that we preferred the previous proposal which was a much smaller scheme. We also explained that very careful design would be needed at this sensitive site with a sufficiently sized landscape buffer introduced to prevent encroachment into the National Park and to provide a less intrusive hard visual edge. As the proposal presently stands we do not think that sufficient landscape and visual assessment has been carried out to: inform the design and layout of the scheme; and to demonstrate that the site has the capacity to accommodate the amount of development proposed without impacting on the special qualities of the South Downs National Park.</p>	
Policy 3: Employment Uses	This policy may have the potential to conflict with Policy 4 relating to North Farm, Wiston Estate, Washington and with the employment policies in the emerging South Downs Local Plan. We recommend that specific mention is made within this policy that it does not apply to North Farm (for which there is a separate policy relating to this site – policy 4) nor to the part of the A24 corridor that lies within the National Park.	Include reference within policy that this policy does not apply to North Farm for which there is a separate policy relating to this site nor to the A24 corridor within the National Park.
Policy 4: North Farm, Wiston Estate, Washington	We are pleased that our previous comments relating to this site have been taken into account and a separate policy exists for North Farm given that it is a sensitive site located at a very narrow part of the National Park and that we have been working with the owners on the wider Wiston Estate Plan. If handled well the redevelopment of this site has the potential to be a real asset	Reword supporting text as suggested in comments section and include additional criteria in policy relating to connections to the rights of way network.

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	<p>to Washington and the SDNP.</p> <p>We recommend some rewording to supporting text and additional policy criteria as follows.</p> <p>In terms of the second sentence of para 4.43, we do not think it is correct to say North Farm is located on the northern edge of the National Park. It may be better to say that it is sensitively located at a very narrow part of the National Park. This paragraph will also need to be updated as the Wiston Estate Plan has now been endorsed by the SDNPA. We also recommend changing 'take account' in the last sentence of the paragraph to 'have positive regard to' (which matches our wording in the emerging South Downs Local Plan). In addition, the last sentence of this paragraph should read '<b>...or</b> any future update', rather than 'on'.</p> <p>There is also no mention of linking the North Farm to the rights of way network in the policy, although connecting with recreation services is mentioned in the supporting text. Consideration should be given to providing a policy criteria in relation to providing connections to rights of way.</p> <p>We note that para's 4.45 and 4.47 contradict each other.</p>	
Policy 9: Green Gaps	This policy refers to the 'Broad location of green gaps.' We are concerned that this will have little meaning / effect in practice unless these are shown on the policies map.	Define Green Gaps on proposals maps.
Policy 10: Tourist Accommodation	<p>We note the policy wording does not specifically seek Sustainable Tourism development and recommend that this is included, particularly where it relates to proposals within the National Park, in line with policies in the emerging South Downs Local Plan.</p> <p>Criteria 2 should also refer to cycle parking spaces along with car parking spaces. The SDNPA draft Cycling and Walking Strategy seeks to support tourism businesses in providing a Walkers and Cyclist welcome. Consideration should be given to including mention of this in the supporting text.</p>	Include support for sustainable tourist accommodation in the policy as well as cycle parking.
Policy 13: Allotments	This policy, while relating to allotments in general, also mentions in the supporting text, the relocation of the existing allotments at Ravenscroft into	Include reference within this policy to Policy 2 - criteria iv) Ravenscroft Allotment Site, Storrington and the proposal to

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	the National Park. (Please refer to our comments relating to this site and our concerns regarding the amount of allotments proposed). This policy needs to ensure that allotments (which have associated development such as sheds, fences, other structures and parking etc.) do not cause harm to the special qualities of the National Park and its purposes. This policy should be cross referenced to Policy 2 criteria iv) Ravenscroft Allotment Site.	relocate the Ravenscroft Allotments to land within the National Park. The policy should also state that proposals for allotments within the National Park or its setting need to be informed by an assessment of the landscape context and do not cause harm to its special qualities by virtue of their location, layout or design.
Policy 15: Green Infrastructure and Biodiversity	We welcome this policy.	
Policy 16: Local Green Spaces	<p>This policy may need to be updated following the further Local Green Space assessment work.</p> <p>The last paragraph of this policy only refers to the recreational value of a Local Green Space whereas the NPPF stated that o LGS designation is about protecting spaces that are valuable to the community as a result of their beauty, historic significance, recreational value, tranquillity and wildlife. Recommend re-wording this policy in line with NPPF.</p>	<p>Consider replacing last paragraph of this policy with alternative wording relating to development that is necessary to preserve the value of the Local Green Space to the community. Lavant Neighbourhood Plan (as modified) has quite a good example of a local green space policy. This refers to the proposed development being of benefit to the community and will not detrimentally impact the particular local significance of the space.</p> <p><a href="https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/lavant-neighbourhood-plan/">https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/lavant-neighbourhood-plan/</a></p>
Policy 18 (Traffic and Transport)	As part of this policy seeks to protect and improve existing routes, and secure funds (including through CIL) for rights of way network development, it would add clarity and value to the NDP if an access map was provided showing existing routes. In addition this could also any aspirational or proposed routes. Including any new routes that are identified as part of the site allocation proposals could also be identified.	Include a map showing existing and proposed/ aspirational access routes.
Community Aims	It is not clear what the difference in status is between the section on Community Aims and the other policies in the Neighbourhood Plan and how it is intended for this section to be used when considering proposals for	The difference in status in planning terms between the community aims section and the policies in the rest of the plan needs to be more clearly explained and how they are to be used when assessing proposals for development.

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	<p>development.</p> <p>In terms of Aim 1 - Creation of Sandgate Country park, 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</p>	<p>Consider including an aspiration to restore heathland on the site in the supporting text.</p>
Infrastructure	<p>This section makes no reference to SDNPA CIL or planning obligations, even though money could still be collected through CIL in the National Park.</p> <p>Para 5.6 –The NDP steering group should identify or start to think about the infrastructure project preferences they would like to suggest in the Neighbourhood Plan. This would demonstrate a joined-up approach to recognising what pressures on infrastructure the growth identified in the Plan would be likely to have.</p> <p>The SDNPA and West Sussex County Council have an aspiration to provide a safe off road or segregated cycle path from the Findon Valley Roundabout A27/A24 junction in Worthing to connect with Washington and enable access into the National Park. This is mentioned in our draft Cycling and Walking Strategy and also identified in West Sussex CC's Walking and Cycling Strategy. It is likely to come forward for a feasibility study led by WSCC.</p>	<p>Include reference to SDNPA as well as HDC in terms of funding from CIL.</p> <p>Consider the inclusion of a list of priority infrastructure projects.</p> <p>Consider mention of the segregated cycle-path as a potential infrastructure project in the supporting text.</p>
Maps	<p>It would be helpful to identify the National Park boundary on all maps where applicable, and to identify that Map 5 is entirely within the National Park.</p>	<p>Include National Park boundary on Maps.</p>