

SDNPA response to Steyning Submission Neighbourhood Development Plan September 2020

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

Ref	Comment	SDNPA Recommendation
General Comments	<p>The parish council should be congratulated on producing a clear and well laid out Neighbourhood Development Plan (NDP) document. We recognise that this plan has been prepared within a relatively short time frame and therefore addresses a limited scope of issues. However, we welcome the focus on the natural environment, design and green spaces which are key to the Purposes of the National Park.</p> <p>Nearly a third of the parish area lies within the South Downs National Park (SDNP). We therefore welcome the prominence given to promoting the parish as a key gateway to the National Park in the Vision.</p> <p>Strategic Policy SD25 of the South Downs Local Plan (SDLP) identifies towns and villages across the National Park that are able to accommodate growth of a scale and nature appropriate to their character and function. Given the settlement of Steyning is outside the SDNP, the village is not identified in this policy or SD27 which sets housing provision in towns and villages across the National Park. We consider the Steyning NDP to be in general conformity with these strategic policies of the SDLP.</p>	
Legal & Planning Policy Context	<p>Reference is made in paragraph I.16 to 'Estate Wide Plans'. This reference should be corrected to 'Whole Estate Plans'. Whole Estate Plans (WEPs) are non-statutory plans which demonstrate the overall position and aspirations of an organisation. WEPs endorsed by the National Park Authority can be a material consideration in the determination of a planning application.</p>	<p>Correct reference to Whole Estate Plans.</p>

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About Steyning Parish	We previously commented on the useful section on the biodiversity of the Parish is included from 2.35 to 2.42. We still consider it would be helpful to include a map of the wildlife sites referred to in this section within the Plan at this point – we can provide assistance in preparing this map if needed.	Include a map of designated wildlife sites within the Plan.
Policy SCP1	As previously commented, we welcome and support the inclusion of river corridors in the Green Infrastructure and Biodiversity policy. The Arun River Corridor is identified in the SDNPA's People and Nature Network (PANN) as a Natural Capital Investment Area. The policy and supporting text could benefit from identifying or giving locally specific examples of green infrastructure rather than just typologies.	Include details of local green infrastructure assets within the Plan.
Policy SCP2	As previously commented, we welcome the focus of SCP2 <i>Responsible Environmental Design</i> and suggest the policy could be strengthened by including measurable targets, for example: a 19% CO2 reduction improvement against Part L (2013) Building Regulations. This target is included in SD48 of the Local Plan and will apply to proposals within the SDNP. We note the reference to the National Design Guide and support this.	Include measurable targets within the policy.
Community Resources	We welcome the reference to Community Infrastructure Levy (CIL) under Community Resources. Whilst we do not object to the sentiments of Policy SDNP5 <i>New Community Infrastructure</i> , we do not consider this to be a policy to be used in development management and would be better kept in the Plan as a community objective or similar.	Delete policy SNDP5
Local Green Space	We note the proposed designation of five Local Green Spaces (LGS), four of which are within the SDNP. The SDNPA is supportive of NDP groups seeking to designate LGS within their neighbourhood area. At	

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Policies Map	<p>the Examination of the South Downs Local Plan, the inspector considered the SDNPA's overarching development approach for villages and towns in the SDNP, including the designation of LGS. The inspector was content for LGS designations to be proposed by respective NDP groups and we welcome the matter now being addressed by the Steyning NDP. We also welcome the inclusion of explanation for each proposed LGS and reasons for designation although we consider further justification could be included to expand on the reasons for designation, for example there is no information on the wildlife significance of the Rifle Range.</p> <p>Three of the proposed LGS are within the Wiston Estate. The SDNPA has endorsed the Wiston Whole Estate Plan (WEP) and it is recommended that the NDP cross-refers the WEP and that the Parish Council liaises with the Estate to discuss how the WEP and Neighbourhood Plan can achieve the delivery of both Visions.</p> <p>The SDNPA is supportive of the principle of Local Green Space designations. We are mindful, however of the criteria of the NPPF that states LGS designation should only be used where green space is <i>demonstrably special to the local community and holds a particular local significance</i> and that <i>designating land as LGS should be consistent with the local planning of sustainable development</i>. In light of this, the independent examiner may come to a view that one or more of the proposed sites do not meet the tests of the NPPF. The SDNPA will duly consider any such recommendation the examiner decides to make.</p> <p>Paragraph 7.3 should also acknowledge designations from the South Downs Local Plan are not shown on the Policies Map.</p>	<p>Cross-refer to the Wiston Whole Estate Plan and liaise with the Wiston Estate.</p> <p>Include reference to South Downs Local Plan designations.</p>

