

Report to	<b>Planning Committee</b>
Date	<b>10 May 2018</b>
By	<b>Director of Planning</b>
Title of Report	<b>South Downs National Park Authority (SDNPA) response to the Pre-submission (Regulation 14) Consultation on the Stedham with Iping Neighbourhood Development Plan</b>
Purpose of Report	<b>To agree the content of the SDNPA response to the Pre-submission consultation on the Stedham with Iping Neighbourhood Development Plan</b>

**Recommendation: The Committee is recommended to agree the Table of Comments as set out in Appendix 2 of the report which will form the SDNPA representation to the Stedham with Iping Neighbourhood Development Plan Pre-submission consultation.**

## **1. Introduction and Summary**

- 1.1 The SDNPA actively promotes and supports community led plans and following a successful Referendum, Neighbourhood Development Plans (NDPs) become part of the Development Plan for the neighbourhood area.
- 1.2 Stedham with Iping Parish Council is the 'qualifying body' with responsibility for preparing the Stedham with Iping Neighbourhood Development Plan (NDP). The Parish Council has progressed its NDP to Pre-submission stage fairly rapidly which is a result of a considerable amount of hard work by the Parish Council and volunteers.
- 1.3 A minimum of six weeks formal consultation is required on all draft NDPs prior to submission to the Local Planning Authority. The SDNPA response to this consultation is set out at **Appendix 2**. The Pre-submission Stedham & Iping NDP is provided as **Appendix 3**.
- 1.4 Following the Pre-submission consultation, Stedham with Iping Parish Council will need to take into account the responses received and submit the amended Stedham & Iping NDP to the SDNPA for consultation and then examination.

## **2. Background**

- 2.1 Stedham with Iping Parish is a very attractive rural Parish, approximately two miles to the west of Midhurst and north of the A272. The decision to produce a NDP was only taken by the Parish Council in July 2017, largely in response to the proposed mixed use (housing and employment), Allocation Policy SD92 at the Sawmills Site in Stedham, contained in South Downs Local Plan (SDLP).
- 2.2 Work progressed on the SDLP with the Pre-submission consultation running from September to November 2017. Members agreed at Planning Committee in June 2017 that the Stedham Sawmills site should not be deleted from the Local Plan as it was considered the best site for development in the village based on the evidence gathered by the Authority. The deletion of the site from the Pre-Submission Local Plan risked creating a gap in the

development plan for Stedham & Iping Parish if the NDP did not progress successfully. The Parish Council made a representation to the Pre-submission Local Plan objecting to the Stedham Sawmill allocation. A number of changes have been made to the Local Plan allocation to address some of the issues raised by both the Parish Council and Natural England. The site is included in the Submission version of the Local Plan and will therefore be considered for independent examination.

- 2.3 The introduction to the Stedham & Iping NDP explains that the main reason for preparing the NDP is to enable the Parish Council to make their own decisions regarding the location, scale and design of new housing based on consultation with the community.
- 2.4 The Parish Council distributed a questionnaire to all residents in the Parish in August 2017. This formed the basis for the vision statement, as well as identifying the issues that needed to be addressed by the NDP. A call for sites was made to all landowners in the Parish in September 2017. In response to this, the Parish Council were notified of 11 sites, of which 7 were in, or adjacent to, Stedham Village. The sites were then assessed against a range of criteria which resulted in two sites being taken forward as proposed allocations in the Pre-submission NDP.
- 2.5 The first is a site for 8-12 houses on the north eastern part of the Stedham Sawmills site, subject to conditions on landscaping, parking and protection of the Stedham Common SSSI. The rest of the site is to remain allocated for light-industrial use with open space to the south to act as buffer to the SSSI and to retain a clear separation between the village and the A272. The second is a site for up to eight affordable homes west of West Lodge, Rotherhill on the western edge of the village. The result of the sites assessment process is set out in the document '[Assessment of potential development sites.](#)'
- 2.6 The NDP also addresses other issues and topics in the Parish, such as protecting heritage assets and the natural environment, encouraging small workshops and seeking improvements to transport links and parking. An extensive evidence base has been compiled to support the policies in the NDP.
- 2.7 The following stages in the preparation of the NDP have been completed so far. The evidence base supporting the Stedham & Iping NDP can be viewed on the Stedham with Iping Parish Council website at [http://www.stedhamwithiping-pc.gov.uk/Neighbourhood\\_Plan/Neighbourhood\\_Plan.aspx](http://www.stedhamwithiping-pc.gov.uk/Neighbourhood_Plan/Neighbourhood_Plan.aspx)

2.8

Stage	Detail
Designated a Neighbourhood Area	1 August 2017
Pre-submission consultation on the plan (Reg 14)	Commenced on the 5 April 2018
Submitted to SDNPA and published for consultation (Reg 16)	To follow
Independent Examination	To follow

- 2.9 The Neighbourhood Planning Regulations require all qualifying bodies (Stedham with Iping Parish Council in this instance) to carry out Pre-submission consultation on a draft of the NDP prior to submission to the local planning authority. The public consultation on the Stedham & Iping NDP started on 5 April 2018 and will finish at midnight on 17 May 2018. It was launched with a drop-in event at Village Hall early on in the consultation period.
- 2.10 Once a NDP comes into legal force after a successful referendum it will form part of the statutory development plan.
- 2.11 A screening request to the SDNPA has also been made by the Parish Council as to whether Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) is required. Consultation with Historic England, Natural England and the Environment Agency with regards to this is currently taking place.

### 3. Stedham with Iping Neighbourhood Development Plan – SDNPA response

- 3.1 Stedham with Iping is included in the list of settlements for which the principle of development will be supported within a defined settlement boundary in Policy SD25 of the SDLP. There is a proposed housing provision figure of 18 dwellings for the settlement, as set out in policy SD26. In addition, the SDLP contains a mixed use (housing and employment) Allocation Policy SD92 at Stedham Sawmills to meet Policies SD26 and 35 of the SDLP.
- 3.2 The Neighbourhood Planning Regulations state that a NDP must be in general conformity with the strategic policies contained in the Development Plan for the area. Therefore, it is a requirement that the Stedham & Iping NDP is in general conformity with the saved policies of the Chichester District Council Local Plan (1999).
- 3.3 In terms of conformity with emerging Local Plans, the advice from NDP Examiners has been that while there is no requirement for the NDP to be in general conformity with the strategic policies of the emerging Local Plan, it is important to minimise conflicts between the policies in the two plans and both parties should work together to resolve issues. NDP's should also not duplicate policies already covered by Local Plans. This is because the degree with which the NDP reflects and accords with emerging Local Plan policies could affect the NDP's power to shape development in the future.
- 3.4 The SDNPA formal representation to the Stedham with Iping NDP Pre-submission consultation is set out in **Appendix 2**. The following key points are raised in the representation.
- While the SDNPA actively promotes and supports community led plans, the decision to prepare the Stedham & Iping NDP has come at a relatively late stage in the production of the SDLP. The NDP currently contains an allocation policy that conflicts with the SDLP Allocation Policy SD92 at Stedham Sawmills.
  - The SDNPA has now submitted the SDLP to the Secretary of State for independent examination along with all the representations made at the Pre-Submission stage, including that made by Stedham with Iping Parish Council. Therefore, it is a matter for the Inspector to decide whether the Local Plan is sound and legally compliant and whether the SD92 site should be allocated for development.
  - As a result of advice from Natural England and in order to address some of the concerns of Stedham with Iping Parish Council with regards to SDLP Allocation Policy SD92, we have proposed a series of changes to the Local Plan Inspector. These include incorporating mitigation measures to reduce recreation disturbance impacts on Iping and Stedham Common Sites of Special Scientific Interest (SSSI) and requiring that part of the southern area of the site remains undeveloped. This is to provide biodiversity enhancements; to ensure that Stedham remains a village focused on School Lane (in accordance with its historic character) and not joined to the A272 and to provide a suitable transition from urban to rural development.
  - We are also proposing to the Inspector that the number of dwellings required in the Local Plan Allocation is reduced from 'between 16 -20 dwellings' to 'up to 16 dwellings' and the amount of employment space reduced from 3,000m<sup>2</sup> to 1,500m<sup>2</sup>. In addition we have requested that the settlement boundary is amended so that the open space lies outside the settlement.
  - In light of the above, we think that the aims of the SDNPA and those of Stedham with Iping Parish Council for this site are now not that far apart. However, we consider that the development strategy proposed in the Local Plan of concentrating more development on the Sawmills Site is preferable to that proposed in the NDP of developing two separate sites. This is because the Local Plan allocation for 16 dwellings, makes more efficient and appropriate use of land and makes best use of brownfield site, in line with Strategic Policy SD25: Development Strategy of the Local Plan, than the approach proposed in the NDP for less dwellings here.

- Alongside the above, while we recognise the allocation at Land west of West Lodge seeks to deliver affordable housing in the form of eight self-build or custom-build dwellings, we have concerns regarding the landscape impacts of this second site allocation and whether affordable housing as defined in the SDLP, will be delivered here. The land forms part of a locally important historic parkscape and a fairly intensive development in this location would be out of keeping with the low density rural character of this edge of the village.
- As the Stedham & Iping NDP continues on to submission and then examination, it will be up to the NDP examiner to decide whether the plan meets the basic conditions and whether any modifications are required so that it did. The Examiner would consider the findings of the Local Plan Inspector if they had already been published.
- We recommend that the SDNPA and Stedham with Iping Parish Council work together to resolve outstanding issues.

#### 4. Planning Committee

- 4.1 This is the first occasion that the Stedham with Iping NDP has been presented to Planning Committee. It is being considered at this stage due to the level of development being proposed and the allocation of land.

#### 5. Next steps

- 5.1 If agreed the response will be sent to Stedham with Iping Parish Council for them to consider alongside the other representations they receive. They will then amend the plan and submit it to the SDNPA for examination.

#### 6. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	Yes – It is anticipated that Planning Committee will be asked to agree the SDNPA response to the NDP at all significant stages. The next occasion will be the SDNPA representation on the submitted plan.
Does the proposal raise any Resource implications?	Yes - The cost of Neighbourhood Planning to the SDNPA is currently covered by the grants received from MHCLG. 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 £8,100 (including the Examination and referendum) to £50,000.  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.
Has due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	There are no implications arising directly from this report. Stedham with Iping Parish Council who have the responsibility for preparing the neighbourhood plan will be required to prepare a Consultation Statement to support the submission version of the SINDP setting out how all sections of the local community (people who live, work or carry out business in the neighbourhood area) including hard to reach groups, have been engaged in the plan's production.

<b>Implication</b>	<b>Yes/No</b>
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>The qualifying body with responsibility for preparing the neighbourhood plan must demonstrate how its plan will contribute to the achievement of sustainable development. 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><b>Strategic Environmental Assessment</b></p> <p>A screening opinion consultation with the three environmental bodies as to whether SEA is required is underway. If this is required the Qualifying body will need to prepare SEA/SA before the formal submission stage.</p>

#### 7. Risks Associated with the Proposed Decision

<b>Risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigation</b>
Stedham with Iping Parish Council does not take account of the recommendations proposed in the SDNPA representation, and the Stedham & Iping NDP may not meet all the basic conditions for NDPs or the aspirations of the SDNPA.	High	Low/Medium	There is no requirement for the Parish Council to agree to all proposed amendments so the risk cannot be fully mitigated.
There is a reputational risk for the SDNPA associated with raising areas of concern about the Stedham & Iping NDP. Communities are sometimes frustrated by the perception that their hard work and effort in producing such plans is not fully appreciated and taken into account. However, to not highlight the views of the Authority at this stage in the plan preparation would be failing in our duty to support such groups and potentially result in a plan that does not deliver outcomes that meet the needs of both the community and the SDNPA.	Medium	Medium	SDNPA planning officers will continue to seek to influence and guide the preparation of the Stedham & Iping NDP so that conflicts between policies in the NDP and Local Plan are minimised.

**TIM SLANEY**  
**Director of Planning**  
**South Downs National Park Authority**

Contact officer: Alma Howell (Neighbourhood and Planning Policy Officer)  
Tel: 01730 819309  
email: [alma.howell@southdowns.gov.uk](mailto:alma.howell@southdowns.gov.uk)  
Appendices  
1. Stedham with Iping Designated Neighbourhood Area Map  
2. SDNPA Response to the Pre-submission Draft Stedham with Iping Neighbourhood Plan  
3. Stedham with Iping Neighbourhood Development Plan (Pre-Submission)  
SDNPA Consultees Director of Planning, Legal Services. Consultation with statutory bodies has been undertaken by PTC.  
Background Documents [http://www.stedhamwithipping-pc.gov.uk/Neighbourhood\\_Plan/Neighbourhood\\_Plan.aspx](http://www.stedhamwithipping-pc.gov.uk/Neighbourhood_Plan/Neighbourhood_Plan.aspx)



Designated Stedham with Iping Neighbourhood Area



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**SDNPA response to Stedham with Iping Pre-submission Neighbourhood Development Plan**

All references to emerging South Downs Local Plan (SDLP) policies relate to the Pre-submission version rather than any subsequent revision. Please note that work is continuing on the emerging SDLP which was submitted to the Secretary of State for Examination in April 2018. All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation
General Comments	<p>The Parish Council has progressed its NDP to Pre-submission stage fairly rapidly which is as result of a considerable amount of hard work by the Parish Council and volunteers.</p> <p>The NDP clearly address issues that are important to the community and seeks to protect the features that give the Parish its distinctive character and appearance.</p> <p>While the SDNPA actively promotes and supports community led plans, the decision to prepare the Stedham &amp; Iping NDP has come at a relatively late stage in the production of the SDLP. The NDP currently contains an allocation policy that conflicts with the SDLP Allocation Policy SD92 at Stedham Sawmills.</p> <p>We discuss this issue in more detail in this table under our response to NDP Policy SINDP7– Stedham Sawmills.</p> <p>While we recognise that the allocation at Land west of West Lodge seeks to deliver 100% affordable housing in the form of eight self-build or custom-build dwellings, we have concerns regarding whether affordable housing as defined in the Local Pan will realistically be delivered and with regards to impacts on the landscape, trees and settlement character of developing this site.</p> <p>We have also made some suggestions in the table below to help refine policies further to ensure that they are more effective in meeting the aims and objectives of the Neighbourhood Plan; are more usable for planning officers and respect the purposes and duties of the South Downs National Park Authority (SDNPA).</p>	N/A
Strategic Environmental assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion	<p>We have consulted the three environmental agencies i.e. Historic England, Natural England and the Environment Agency as to whether SEA or HRA is required and are awaiting to hear back from them.</p>	<p>The SDNPA will issue a screening opinion as to whether SEA or HRA is required as soon as we have heard back Historic England, Natural England and the Environment Agency.</p>



Ref	Comment	SDNPA Recommendation
SINDPI – Settlement Boundary	We note that a slightly different settlement boundary has been drawn in the NDP to that identified in the SDLP. This could cause confusion when applications for planning permission are made in the locations where these differences occur.	The SDNPA and the Parish Council will need to work together to resolve this issue or it will be considered through the Examination into the NDP.
SINDP2 -Preserving our rural character	We question the need/function for the designation of a Local Gap to the north of Stedham village and between the countryside around the hamlet of Iping as shown on the Stedham & Iping NDP Map. The purpose of Local Gaps policies are to prevent coalescence of settlements where there are development pressures. The hamlet of Iping does not have a settlement boundary and in planning policy terms is considered part of the wider countryside, where in general development is restricted. The Local Gap designation is therefore unnecessary.	We recommend the Local Gap designation is deleted as it is not necessary.
SINDP6 - Promoting Health and Wellbeing	This policy states that all developments of more than three units must provide facilities such as outdoor gym equipment. We question the enforceability and appropriateness of this requirement, how well the proposed equipment would be used, where it would be located within the development as communal space would be required, and whether it would lead to a proliferation of visual clutter. We think it would be better for this equipment to be located in one place such as at the playing fields or recreation ground.	We recommend this policy is deleted as we question its appropriateness.
SINDP7 – Stedham Sawmills	<p>This policy conflicts with that of the SDLP allocation policy SD92: Stedham Sawmills.</p> <p>The Stedham &amp; Iping NDP may come into force at a similar time as the SDLP, and therefore it is recommended that the NDP policies are in general conformity with that of the SDLP. This is because the degree with which the NDP reflects and accords with emerging Local Plan policies could affect the NDP's power to shape development in the future.</p> <p>In order to address some of the concerns of Stedham with Iping Parish Council and as a result of advice from Natural England with regards to the Sawmills Site, we have proposed a series of changes to the Local Plan Inspector. These include incorporating mitigation measures to reduce recreation disturbance impacts on Iping Common Site of Special Scientific Interest (SSSI) and requiring that part of the southern area of the site remains undeveloped. This is in order to provide biodiversity enhancements; to ensure that Stedham remains a village focused on School Lane (in accordance with its historic character) and not joined to the A272 and to provide a suitable transition from urban to rural development.</p>	<p>We recommend the deletion of Policy SINDP7 in the NDP as this conflicts with Local Plan Allocation SD92.</p> <p>We advise that the SDNPA and the Parish Council work together so that the NDP policies add locally distinctive detail to the Local Plan Allocation to ensure high quality development is delivered at this site.</p>

Ref	Comment	SDNPA Recommendation
	<p>We are also proposing to the Inspector that the number of dwellings required in the Local Plan Allocation is reduced from 'between 16 -20 dwellings' to 'up to 16 dwellings' and the amount of employment space reduced from 3,000 m2 to 1,500m2. In addition we are have requested that the settlement boundary is amended so that the open space lies outside the settlement.</p> <p>We think that both the SDNPA's aims and Stedham with Iping Parish Council's aims for this site are now not that far apart.</p> <p>We are of the view that the development strategy proposed in the Local Plan of concentrating development on the Sawmill's site to meet local housing needs is preferable to that proposed in the NDP of developing two separate sites, in particular given the impacts on landscape and settlement character of developing the site Land west of West Lodge. The issues with respect to Policy SINDP8 - Land west of West Lodge, Stedham are discussed in more detail below.</p>	
<p>SINDP8 – Land west of West Lodge, Stedham</p>	<p>We are supportive of Parishes seeking to deliver affordable housing to meet local housing need, and the delivery of rural exception sites.</p> <p>We question however, the principle of the allocation of an 'Exception Site' as this could raise land values and affect the deliverability of affordable housing.</p> <p>We also question whether affordable housing as defined in the SDLP will be delivered here such as social or affordable rented or intermediate forms e.g. shared ownership, if the houses are to be only self-build and custom build.</p> <p>We note that this policy is not supported by a Local Housing Needs Survey that identifies the specific affordable housing needs of the Parish, including the demand for self-build. The parish will need to speak the Chichester District Council's Rural Enabling Officer for evidence of the local housing need in Stedham with Iping Parish and for the other Parishes mentioned in this policy.</p> <p>In addition, if the Parish Council wishes to adopt a different local connection policy to that of Chichester District Council (as the Housing Authority) then this needs to be supported by local evidence.</p> <p>We also have concerns regarding the impacts on the landscape, trees and the character of this part of the settlement from developing this site for eight</p>	<p>We recommend that:</p> <ol style="list-style-type: none"> <li>1) Stedham and Iping Parish Council meet their Local Plan housing provision and housing need through the Local Plan allocation and concentrate development on the Sawmills Site;</li> <li>2) If it is demonstrated that there is additional affordable housing needed in the Parish and the Parish Council still wishes to pursue the allocation at Land west of West Lodge, then the SDNPA will need assurance that affordable housing as defined in the Local Plan will be delivered here; and</li> <li>3) The SDNPA and the Parish Council will need to work together see if there are ways of overcoming the landscape issues identified.</li> </ol>

Ref	Comment	SDNPA Recommendation
	<p>dwelling. The SDLP Strategic Policy SD29: Rural Exception Sites states that such sites should relate well to the existing settlement and landscape character.</p> <p>The site forms the southern part of the historic garden and setting to Rotherhill House. Rotherhill House is a substantial country house that most likely dates from 1799. While it is not listed it together with the parkland, forms a locally distinctive, coherent historic landscape and an important, characteristic setting to Stedham village. This parkscape is noted on the Historic Environment Record. The southern extent of this parkscape lies along the road which accesses the Nursery. The entrance to the parkland is also extant, marked by West Lodge. The trees within the site are historically coherent and mark an important historic boundary which contributes to their value and significance in landscape character terms. Whilst the site is currently used for equestrian activities and is somewhat bisected by post and rail fencing, its fundamental parkland character remains intact.</p> <p>We have visited the site and consider that a fairly intensive development of eight dwellings would cause harm to the historic landscape character associated with this part of the National Park. It would also be out of keeping with the low density sporadic rural edge of the village.</p> <p>We appreciate that there are clear public benefits in developing this site for affordable housing, but in light of the landscape impacts, and the nature of the affordable housing to be provided, we consider that the housing needs of the village would be best met through concentrating development on the Sawmills Site.</p> <p>If additional local housing need is identified above that will be provided through the allocation of the Sawmills Site and the Parish Council still wish to pursue affordable housing on Land west of West Lodge, we will need to be assured that affordable housing as defined in the Local Plan will be delivered here and an appropriate scheme can be developed that does not cause undue harm to the landscape.</p>	
SINDP 9 Unallocated residential development	In terms of the second part of this policy relating to small-scale development outside the settlement boundary, we have concerns that criteria (i) is too restrictive in terms of not allowing any development to be located on any agricultural land. This could prevent suitable rural exception sites or other	Amend policy to remove criteria (i) relating to agricultural land outside the settlement boundary.

Ref	Comment	SDNPA Recommendation
	development that needs a countryside location coming forward, weakening the community's ability to deliver affordable housing and other sustainable rural development.	
SINDPI0 - A strong local economy	<p>We question how enforceable this policy is regarding resisting proposals that would reduce the number of Full-time Equivalent Jobs on key employment sites and whether this will prevent other businesses taking over a site that might otherwise be the only way of saving the business or site.</p> <p>We understand the aspirations behind the second part of this policy relating to Large Scale Economic Development given the character of the Parish and the impact a major economic development may have on this. However, we think that it will be difficult to implement this policy unless there is a clear definition of what is meant by a Large Scale Economic Development. We suggest it may be better to leave this issue to the South Downs Local Plan and the tests set out in this regarding what constitutes Major Development and how this will be assessed in terms of impacts on National Park purposes.</p>	<p>Recommend removal of the requirement in this policy that the proposal will not result in a net loss in FTE jobs. Alternative wording is suggested to say; 'that the change of use of key employment sites to other uses will be resisted.'</p> <p>Consider deletion of the second part of the policy relating to 'Large Scale Economic Development'.</p>
SINDPI2 Communication Infrastructure	We think that this policy is too unrestrictive and should include wording regarding taking into account harmful visual impacts of telecommunication structures and encouraging sharing of mast structures.	Include additional wording in policy to highlight potential visual impacts and the encouragement of sharing of mast structures in order to protect the special qualities of the National Park.
SINDPI3 – Iping Common SSSI	<p>While appreciating the intentions behind this policy, we are not clear where the evidence to support his policy has been obtained and whether the policy criteria have been drawn up in consultation with Natural England. The 125m and 400m Policy Zones around the site do not correspond with the Impact Risk Zones defined by Natural England for this SSSI. This will cause confusion when applications for planning permission are made.</p> <p>As part of the Pre-submission consultation on the NDP, Natural England will have been consulted on this policy and will therefore provide advice with respect to the issues we have raised.</p>	We recommend that this policy is removed or revised in line with advice from Natural England
SINDPI4 – Dark Skies	We note that the NDP 'Natural Environment' supporting document says that the SDNPA local plan policies don't go far enough in respect of protecting Dark Night Skies. We would urge some caution with the lighting principles that 'SINDPI4 – Dark Skies' tries to address. For example the policy states that 'any external lighting should be for health and safety reasons.' This can be quite wide	<p>Recommend amendments to the second part of this policy to say:</p> <p>"Development proposals shall only incorporate external lighting where it considered essential for</p>

Ref	Comment	SDNPA Recommendation
	<p>ranging, e.g. is it a safety risk to play tennis at night without lights? We would suggest that a distinction is made between actual Health &amp; Safety lighting, .e.g. for walkways and emergency exits, and amenity and task lighting which covers things like car parks, sports etc.</p> <p>We therefore suggest some re-wording of the second para of this policy.</p> <p>We also recommend the inclusion of a sentence about glazing as this can be quite obtrusive on a dark landscape rather than the sky overhead.</p>	<p>health and safety or if the required level of light does not represent a significant threat to darkness. All light fittings must be installed correctly to minimise light pollution, prevent the upward spill and only be used when needed.”</p> <p>In terms of glazing we suggest the following additional wording :</p> <p>“Development proposals should avoid excessive glazing and use sufficient mitigation where glazing cannot be avoided. Sufficient mitigation could be low transmittance glass, louvres, auto black out blinds or smart glass.”</p>
SINDP17 - Parish Heritage Assets	We suggest that consideration is given to whether the section of the former Midhurst-Petersfield railway line within the parish is worthy of designation as a Parish Heritage Asset, especially the attractive road bridge at Ingrams Green.	Consider inclusion of the former Midhurst-Petersfield railway line within the parish, especially the attractive road bridge at Ingrams Green as a Parish Heritage Asset
SINDP18 - Barn Conversions	We advise that either a clear definition of what is meant by ‘Sussex Barns’ is provided in the supporting text or the word ‘Sussex’ is removed from this policy so that it just refers to traditional barns. We also think that conversions often relate to other traditional farm buildings such as granaries, cartsheds and pigsties and other outbuildings. Therefore it may be more appropriate for this policy to refer to traditional farm buildings.	Suggest inclusion of a definition of what is meant by a Sussex Barn or consider removal of the word Sussex. Also suggest that the policy refers to Traditional Farm Buildings rather than just barns.
Supporting Text - Getting Around Chapter	<p>We are supporting of the objectives for this chapter and the desire for better connectivity via a circular path around Stedham. We have however some clarifications to the supporting text to make.</p> <p>The LipChis Way and Serpent Trail should be described as designated National Trails. More could be said about improving connectivity in other ways, for example into Midhurst for non-motorised users – to encourage greater use of walking and cycling as alternatives to the car.</p> <p>The Evidence document ‘Getting Around Transport and Accessibility’ mentions the possibility of a cycleway between Midhurst and Petersfield along the disused railway line. This is an aspirational route identified in the SDNPA’s Cycling and</p>	Note clarifications and suggested additions to supporting text

Ref	Comment	SDNPA Recommendation
	<p>Walking Strategy and the Authority is working with MAC and other local stakeholders identified in the document to move this project along. This could be mentioned in the main text of the Plan as it would be useful for future support of the project and it is clear from the evidence work that local people are involved.</p> <p>The preamble text makes much of the need for the Parish Council to get WSCC to do more around maintenance and to bring forward improvement projects for rights of way. The more preparation and background work the Parish Council's do in this area, the easier it is for a project to be taken forward. The supporting text could highlight this and say the Parish Council will work with landowners to get schemes to the point where the agreements are in place and can go forward.</p>	
SINDP20 Permissive and Public Rights of Way	We think this policy, especially the second paragraph, duplicates SINDP22 – Maintaining and Improving Accessibility and question whether it is needed	Consider combining this policy with that of SINDP22 – Maintaining and Improving Accessibility.
Community Infrastructure Levy (CIL)	<p>There is no mention in the Plan of CIL, or any explicit indication of how CIL money collected from development in the area might be prioritised, or indeed what projects within the area that might be considered suitable for funding through the CIL money that will be collected by the Parish Council. There are potentially a number of key projects and actions in the NDP that could be drawn out as a starting point for this, for example health and wellbeing equipment and rights of way connectivity.</p> <p>There is no set way of how to address CIL in NDP's, although the Wisborough Green NDP (<a href="http://www.chichester.gov.uk/neighbourhoodplan#wisborough">http://www.chichester.gov.uk/neighbourhoodplan#wisborough</a>) is a good example of how consideration has been given to various projects and how they might be funded, as well as how these might be prioritised by the Council (see the community action plan towards the end of the document).</p>	Consider inclusion of a section in the NDP on Community Infrastructure Levy along with projects that would prioritised for funding.