

SDNPA response to Upper Beeding 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 Submission version 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 should be congratulated on producing a clear and well laid out Neighbourhood Development Plan (NDP) document.</p> <p>Nearly two-thirds of the parish area lies within the South Downs National Park (SDNP). We therefore welcome the prominence given to protecting the special qualities of the National Park in the Vision of the NDP and that the National Park boundary is clearly shown on the Policies Maps.</p> <p>The Neighbourhood Plan refers on numerous occasions to the ‘Setting of the National Park’ when we think in fact the Plan is actually seeking to refer to the wider National Park designation and not just its setting. The setting of a designation or area is defined as land outside the designation but part of the immediate and extended environment that contributes to its significance and distinctive character. We advise careful and correct use of the terminology ‘setting’.</p> <p>We have made some recommendation in the table below to help refine policies to ensure that they do not conflict with the emerging South Downs Local Plan (SDLP) and respect the purposes and duty of the South Downs National Park Authority (SDNPA).</p> <p>We also set out some detailed comments and policy recommendations on Policy 3: Land East of Pound Lane, Policy 5: Land at Greenfields, Henfield Road and Policy 7 – Land at Valerie Manor, Henfield Road, Upper Beeding.</p>	N/A
Planning Policy Context	<p>Given that two-thirds of the parish lies within the SDNP, we would wish to see greater reference in this section, as has been done for the Horsham District Planning Framework, to relevant policies in the emerging SDLP. The SDLP has now been submitted for Examination and it is intended that it will be adopted</p>	<p>List relevant policies to the Neighbourhood Plan as set out in the SDLP. The National Park can provide a list if needed.</p>

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	early next year. Currently this section only refers to SDLP Strategic Site Policy SD56: Shoreham Cement Works.	
Chapter 5 Vision and Objectives	While we welcome the importance given in the Vision to protecting the National Park, we recommend some re-wording to improve clarity and so that the Vision reflects National Park purposes and duty. We are also not clear what is meant by a shared plan, what type of document this will be and what its status in planning terms is. We consider that the first sentences of the Vision are sufficient to convey the aim of the NDP to protect the National Park and the desire for joint partnership working between the Parish Council and the SDNPA. This partnership working can be implemented through joint community projects. We recommend the deletion of the last sentence of the first paragraph of the Vision.	We recommend that the first part of the Vision is re-worded to say: Upper Beeding and Small Dole will have retained their own distinctive characters and they will have worked successfully with the South Downs National Park Authority (SDNPA) to; protect the <u>special qualityities of their shared the South Downs National Park landscape setting</u> , improve accessibility for pedestrians, cyclists <u>and equestrians, as well as providing and safe routes to schools</u> with better links to Bramber and Steyning, and to develop a green infrastructure plan that improves <u>connections</u> , recreation and leisure opportunities <u>to and within the National Park</u> for the community. <u>This will be supported by a shared plan developed with the SDNPA to protect the shared setting and make improvements to connectivity, green infrastructure and heritage assets.</u>
Objective 1	We recommend some re-wording of this objective to improve its clarity and so that the wording it is in line with National Park purposes and duty.	Objective 1: To <u>conserve and enhance</u> protect the special character; <u>and</u> qualities <u>and identity</u> of the National Park landscape <u>and the character of the rest of the countryside of the parish</u> and maintain the distinctive character of the settlements <u>pattern</u> .
Objective 6	We recommend that this objective refers to improving connections from Upper Beeding to the South Downs Way and the Downs Link	To develop a green infrastructure plan for the parish that will improve accessibility for pedestrians, cyclists and safe routes to school and for better links to Bramber and Steyning. To provide access to, and enjoyment of the SDNP as a recreation and leisure amenity <u>and to improve connections from the Parish to the South Downs Way and the South Downs Link.</u>
Spatial Strategy; Para 6.1	While welcoming this list of aims, the second one in this list refers to the 'parish and its setting in the National Park. As explained above setting is land outside a designation and over two-thirds of the parish lies within the National	We recommend that the second aim in this section is re-worded to say: Maintaining the natural and historic character of the parish

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	<p>Park. We understand that the National Park landscape provides the setting to Upper Beeding and Small Dole villages but not to the Parish as a whole.</p> <p>The third aim largely repeats the second one, we therefore suggest this is deleted.</p> <p>In terms of the sixth aim: (Develop a green infrastructure plan that improves recreation and leisure opportunities within the Park for the community), there is also potential to improve connections from the Parish to the South Downs Way and the South Downs Link. For clarity, this aim should say <u>National</u> Park rather than Park.</p> <p>The 10th aim should refer to <u>Shoreham</u> Cement Works rather than just Cement Works.</p>	<p>and that of its setting in the South Downs National Park.</p> <p>Delete third issue: Maintaining the parish's natural landscape.</p> <p>We recommend that the sixth aim in this section is re-worded to say:</p> <p>Develop a green infrastructure plan that improves recreation and leisure opportunities within the <u>National</u> Park for the community <u>and provides better connections from the Parish to the South Downs Way and South Downs Link.</u></p> <p>10th aim to refer to Shoreham Cement Works in full.</p>
Policy 1: Spatial Plan for the Parish: Fourth sentence	The last sentence of this policy refers to the setting of the National Park when it should refer to the National Park designation as a whole.	<p>We recommend that the fourth sentence in this policy is re-worded to say:</p> <p>Proposals will be resisted if they adversely affect the <u>setting special qualities</u> of the South Downs National Park, areas of valued open space and Local Green Space as identified in the Neighbourhood Plan and areas of biodiversity value.</p>
Shoreham Cement Works; Para 7.22	We welcome the reference to the Shoreham Cement Works Area Action Plan (AAP) and the involvement of the Parish Council in that process. The Neighbourhood Plan community aspirations for the site are also noted.	To be noted.
Policy 3: Land east of Pound Land, Upper Beeding	This is a large site allocation on countryside to the north of the village. The site is exposed in views from the South Downs National Park and the footpath along Windmill Hill as well as having important cultural heritage, landscape and biodiversity considerations. While the policy identifies that Pound House, listed at Grade II, lies to the west of the site, the farm within the site is part of a surviving early post-medieval landscape. For information we have identified from our records that part of the site closest to the settlement is on freely draining soils, part on clays with a high groundwater. The site also (partially) lies within the North Bramber Floodplain Biodiversity Opportunity Area.	<p>While we appreciate that some of the constraints and policy principles mentioned below are already identified in the policy criteria, we wish to reinforce the following points and recommend the inclusion of the additional following wording detail in the policy.</p> <ul style="list-style-type: none"> A landscape led approach to the design for this site is required, informed by landscape evidence to ensure the design is contextual and responds to the cultural heritage associated with the site and the surrounding countryside. A standard suburban

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		<p>layout and typology will not be appropriate for this site in light of its rural context.</p> <p>A landscape led approach does not mean providing a Landscape and Visual Impact assessment (LVIA) at the planning application stage, it means generating the landscape evidence before any scheme design, building location, orientation, building sketches etc. are even considered. This evidence should include a thorough understanding of the historic evolution of the site as well as considering all the elements which contribute to character and those which support wildlife. (This explanation can be provide in the supporting text.)</p> <ul style="list-style-type: none"> • Visibility and key views, especially from SDNP should inform the earliest stages of design. The roofscape will be a significant aspect of this assessment and how it will appear in these views. • The scheme should ensure that there is an appropriate and gradual transition between built form and the wider countryside. • The site lies within a floodplain landscape character area which is largely open. Therefore, the landscaping for this site and species choice needs to respond to this character and should not rely on significant tree planting within the site. Planting species should be native, characteristic and deliver multiple benefits. • A net gain in biodiversity should be provided through characteristic landscape elements and improvements to land management. • Water management and quality will need to be considered as part of the development of the site and will form an important part of the landscaping and green infrastructure provision. Sustainable drainage systems (SuDS) should be incorporated in

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		<p>the scheme, including through the provision of green roofs and green streets.</p> <ul style="list-style-type: none"> • Tranquillity and other experiential qualities of the floodplain should be integrated into site understanding and responded to in the design.
Policy 5 – Land at Greenfields, Henfield Road, Upper Beeding	This site is located adjacent to the boundary of the National Park therefore visibility and views from the SDNP should inform the earliest stages of design. Heights of buildings and roofscapes will be a significant aspect of this assessment as well as providing an appropriate boundary transition and buffer with the National Park.	<p>We recommend the following additional wording is included within the policy criteria:</p> <ul style="list-style-type: none"> • Visibility and views assessment from the SDNP should inform the earliest stages of design including heights of buildings and the design of the roofscape; • An appropriate landscape buffer and transition with the National Park boundary should be provided.
Policy 7 – New Development to provide further Care Home provision at Valerie manor, Hnefield Road, Upper Beeding	The site where the proposed further Care Home facilities are to be provided is clearly visible in views from the South Downs Way running to and from Beeding Hill. While we appreciate that new development will be seen in the context of existing built form, the site is highly sensitive due to its visibility from the SDNP and its nationally important trail and as a result of cultural heritage considerations i.e. Valerie Manor; listed at Grade II and likely associated with New House farm – a 19th Century farmstead, present on the Tithe Map and that the site is within the setting of the conservation area).	<p>While we do not have an in principle objection to the development of this site –the site’s location is highly sensitive and has the potential to generate significant harm if not undertaken appropriately from the outset.</p> <p>Importantly, the informal illustrative layout that was provided to us showing one large uniform block would not gain support from SDNPA. It will also need to be demonstrated that 30 extra bedrooms can actually be provided without causing harm.</p> <p>While we appreciate that some of the constraints and policy principles mentioned below are already identified in the policy criteria, we wish to reinforce the following points and recommend the inclusion of the additional following wording detail in the policy or, where identified, in the supporting text.</p> <ul style="list-style-type: none"> • The South Downs National Park Authority will require a landscape-led approach to design for this scheme; including a detailed visibility study; which will directly inform the location, orientation, scale,

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		<p>mass, building form and roof forms. The form of the roof and its relationship with the existing roofscape context, which is juxta-positioned, will be a significant aspect of this assessment.</p> <p>A landscape led approach does not mean providing a Landscape and Visual Impact Assessment (LVIA) at the planning application stage) it means generating the landscape evidence before any scheme design, building location, orientation, building sketches etc. are even considered. This evidence should include a thorough understanding of the historic evolution of the site as well as considering all the elements which contribute to character and those which support wildlife. (This explanation can be provide in the supporting text.)</p> <ul style="list-style-type: none"> • The site is visually sensitive to light spill, affecting the Dark Night Sky Reserve status of the National Park as well as having the potential to have a harmful visual impact from large amounts of glazing on the southern elevation. The design of the new development will therefore need to address these issues as a highly glazed southern elevation in this location is not appropriate. • The landscaping and green Infrastructure proposals for the site will need to provide a positive new edge of settlement at this location. • A standard landscaping scheme on the site will not be supported. The landscaping should be designed in partnership with the new built from to deliver a useable space which provides safe, interesting space for residents to leave fulfilling lives. Dementia-friendly spaces will be needed, along with space for people to undertake their own outdoor activities, gardening, flower-growing, wildlife watching, and spaces for quiet contemplation as well as meeting

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		<p>points and space for outdoor games.</p> <p>The benefits green spaces can deliver for well-being, mental and physical health as well as providing a true sense of place must not be under-estimated. This should be emphasised in the supporting text.</p>
Policy 8 – Design Standards for New Development; second sentence	The second sentence of this policy only refers to areas adjoining the National Park and therefore does not cover any development proposals that will come forward within the National Park. The text also need some editing to reflect the wording in the SDLP.	<p>We recommend that the second sentence in this policy is re-worded to say:</p> <p>In-Within the areas adjoining the South Downs National Park <u>or its setting</u>, proposals must <u>adopt a landscape led approach and conserve and enhance</u> avoid any significant detrimental effect on its landscape <u>character</u> and natural beauty.</p> <p>What constitutes a landscape led approach to design is provided in the SDNPA recommendation in relation to Policy 7 – Valeria Manor and can be included in the supporting text.</p>
Policy 10 – Employment Sites and Supporting Businesses	Some of the employment sites referenced in the policy are located within the SDNP. This policy therefore needs to reflect the wording of the employment policies in the SDLP as it may have the potential to conflict with these otherwise.	<p>Proposals that result in the loss of an existing employment site will only be permitted where it is demonstrated that its continued use is no longer viable, <u>demonstrated by a robust marketing campaign of at least 12 months</u>; unless the site relates to a site specific policy within the Neighbourhood Plan. Proposals to expand an existing employment or business use will be supported, provided there is minimal impact on flood risk, local amenity, traffic, noise and surrounding landscape <u>and other special qualities of the National Park</u>.</p>
Community Aspirations Section in general	<p>It would be useful to reference in this section that the Parish Council can use its portion of Community Infrastructure Levy (CIL) monies to help deliver projects.</p> <p>In addition, it might be helpful if the community aspirations 2, 3 and 5 (on pages 81 – 84 and set out in Appendix F) were listed in order of priority for CIL spending. This would help both us and Horsham in our infrastructure planning</p>	<p>We recommend that this section includes a cross reference to use of CIL monies to deliver projects.</p> <p>Identify or prioritise the most important projects for CIL funding as set out in the community aspirations section.</p>

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	(i.e. identifying the most important projects for funding from both the SDNPA's and Horsham's CIL pot).	
Community Aspiration 2 – Community suggestions for road and access and public transport improvements	<p>We have highlighted above that the Objectives and Spatial Strategy sections should refer to improving connections to the South Downs Way and the South Downs Link. Projects to address the following issues would be welcomed and supported. These issues include:</p> <p>From Upper Beeding the most direct route to South Downs Way would be from the small roundabout in the village, along the A2037 down to the A283 larger roundabout and then along a path from the car park next to the very busy A283 Road. However, the route just described is only suitable for road cyclists as the roadside verges are incomplete and one cannot walk along the whole length of the road. The path from the car park at the AA83 roundabout is also inadequate. Without improvements to the A2037, the alternative connection to the South Downs Way is via Castle Town and the Monarchs Way long distance path. Improvements would enable more circular routes from the settlements into the countryside.</p> <p>Further south, WSCC in liaison with SDNPA is looking at an improved design where the South Downs Way crosses the A283. The new path would accommodate horses more safely than the existing provision but the issue remains that the traffic speeds and volumes are very high which impacts on user enjoyment and perceptions of safety. The Community aspirations section in the plan should also reference equestrians as they are key users of the South Downs Way.</p> <p>From St Marys House, Bramber, an easy access trail has been created which connects with an improved riverside public footpath. This in turn connects with a relatively new Downs Link underpass which means that users of the Downs Link path do not have to cross the A283. The public footpath on the river bank is suitable for cyclists but they are not permitted to use it (although they do). An upgrade of this path to allow cyclists would be welcome. The public footpath along the river connects to the High Street at the bridge but the connection does not provide access for all as steps are involved and the</p>	Neighbourhood Plan to identify projects that would improve connections to the South Downs Way and South Downs Link and address issues identified.

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	width is narrow with access directly onto the road. Improvements to this would also be welcomed.	