

SDNPA response to the Newhaven Submission Neighbourhood Development Plan

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

All references to emerging South Downs Local Plan policies relate to the Pre-Submission version unless specified. All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation to Newhaven Town Council
General Comments	<p>The South Downs National Park Authority (SDNPA) recognises the level of work and commitment demonstrated to prepare the Submission version of the Newhaven Neighbourhood Development Plan (NDP) and congratulates Newhaven Town Council on reaching this stage of the process.</p> <p>SDNPA appreciates where changes have been made to the NDP as a result of comments at the Pre-Submission stage. Some of the comments below reflect cases where SDNPA reiterates previous suggested amendments or changes that were omitted as it is felt important they be included in the NDP.</p> <p>It is also noted and welcomed that the NDP only allocates sites outside the South Downs National Park (SDNP).</p>	
Para 1.10	Amend first sentence to “...planning applications on land within the <u>South Downs National Park...</u> ”	Suggested amendment as left.
Para 1.11	Amend first sentence to “...Local Plan Part 2 (when adopted) and the South Downs Local Plan (<u>when adopted</u>)...”	Suggested amendment as left.
Para 1.23 Table 1	Renumber last task in the Table as 8, as there are two numbered as 7.	Suggested amendment as left.
Paragraph 1.42	There is a factual inaccuracy with regard to basic condition (f) and Habitat Regulations. For accuracy it is suggested the wording is amended to read:	Suggested amending para 1.42 as per the wording on the left.

	<p>“The report identified that the Joint Core Strategy could have a significant effect on the Ashdown Forest SPA/ SAC, but measures were agreed with Natural England to mitigate against the potential significant effects of recreational pressure impacts on the SPA. to offset impacts. Further assessment was undertaken with regard to potential significant effects of air quality impacts on the SAC as set out in the joint South Downs Local Plan and Lewes Joint Core Strategy HRA Addendum. The HRA addendum concludes that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the South Downs Local Plan/Lewes JCS, even in combination with other plans and projects. Lewes District Council confirmed that the Neighbourhood Plan complies with the Habitats Regulations and would not require further assessment.”</p>	
Para 3.9 General Plan 3, page 17	Welcome reference to South Downs National Park in para 3.9. Suggest showing the South Downs National Park on General Plan 3 showing Newhaven in context.	Suggested amendment to General Plan 3 as left
Page 21	Key issues relating to the Environmental Profile of Newhaven: Suggest adding a bullet point, “The protected landscape of the South Downs National Park encloses the town to the north, west and east.”	Suggested adding a bullet point to the table on page 21 as left to acknowledge the relationship between the local environment of Newhaven and the South Downs National Park
Chapter 8. Eastside	Support the overall aims for the regeneration of Eastside. However, below are some comments on specific policies which reflect the proximity of the SDNP and the need for new development to respect the sensitive nature of the protected landscape.	
Policy ESI	<p>For criteria 3, new planting and landscaping needs to have regard to the landscape led approach given the likely impact on the setting on the SDNP.</p> <p>Further detail on a landscape led approach appropriate for this area of the SDNP can be found in the South Downs Integrated Landscape Character Assessment (SDILCA), specifically Appendix A Open Downland, A1</p>	Suggested amending criteria 3, to add a second sentence as follows: “ <u>In order to conserve and enhance the setting of the South Downs National Park any planting or landscaping needs to reflect a landscape led approach as evidenced by the South Downs</u> ”

	<p>Eastbourne to Ouse, A2 Adur to Ouse; Appendix F Major River Floodplains, F2 Ouse Floodplain; and Appendix G Major Valley Sides, G2 Ouse Valley Sides.</p> <p>The relevant documents can be found at the following links: http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-F-Major-River-Floodplains.pdf http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-G-Major-Valley-Sides.pdf</p>	<p><u>Integrated Landscape Character Assessment.</u>”</p>
<p>Policy ES2</p>	<p>Reiterate the comments made at the Pre-Submission stage to add a further criteria to the policy to reflect the impact of new development in Eastside on the setting of the SDNP. Therefore it is suggested the following points are added to the policy: <u>“Development needs to take into account views from the Ouse Estuary nature reserve and the South Downs National Park; and where appropriate include a wide landscape buffer to protect their setting,</u></p> <p><u>Development will need to:</u></p> <ul style="list-style-type: none"> • <u>Respect the site’s contribution to the setting of the South Downs National Park;</u> • <u>Reflect its potential visual sensitivities;</u> • <u>Ensure any future application for development is designed using a landscape-led approach so that the design, layout and landscaping sensitively respond to local landscape character;</u> • <u>Ensure any future application for development includes a Landscape and Visual Impact Assessment;</u> • <u>Ensure that lighting schemes for the site comply with the SDNPA’s dark skies criteria;</u> 	<p>Suggested adding a further criteria to Policy ES2 as underlined on the left to reflect the landscape sensitivities of the SDNP. The landscape led approach in the suggested criteria should refer to the SDILCA as per the comments on Policy ESI above.</p>

	<ul style="list-style-type: none"> • <u>Seek the provision of appropriate footpath and cycle routes from the sites to the National Park.</u> 	
Chapter 9. Transport, Sustainable Movement and Access	<p>To reiterate comment made at Pre-Submission stage.</p> <p>This section would benefit from grouping pedestrians, cyclists and disabled / less mobile needs together wherever possible to encourage a holistic approach to non-motorised travel. Although user needs may vary, a broad approach can lead to schemes that have benefits for all or many and not just some user groups. {Note - Non-motorised users (NMUs) is a known term within Transport Policy and Design guidance}.</p> <p>Where appropriate, in the supporting text and policies, refer to non-motorised users (NMUs) to represent all users (pedestrians, cyclists, disabled and so on) as a collective.</p>	Where appropriate, in the supporting text and policies refer to non-motorised users (NMUs) to represent all users (pedestrians, cyclists, disabled and so on) as a collective.
Policy RI – Recreation, Leisure and Local Green Spaces	<p>To reiterate the comments made at the Pre-Submission stage.</p> <p>It is questioned why the Ouse Estuary Nature Reserve has not been considered for designation as Local Green Space as it lies within the Neighbourhood Plan area and would seem to have some similar qualities to that of Castle Hill.</p>	Consider identifying Ouse Estuary Nature Reserve as a Local Green Space.
Policy NEI – Biodiversity protection and enhancement	<p>For criteria 2, welcome the inclusion of reference to the special qualities and setting of the SDNP.</p> <p>Suggest this wording could be more positive and proactive to read “New development should avoid causing harm to the <u>conserve and enhance the special qualities and setting of the South Downs National Park.</u>”</p>	Suggest amending criteria 2 as left.
Policy DI – Promoting Good Design	<p>Appreciate the inclusion of point j) following SDNPA comments at Pre-Submission stage.</p> <p>For clarity suggest adding to point j) to read “...large buildings when viewed from the surrounding <u>South Downs National Park.</u>”</p>	Suggest adding wording to point j) as left.