

SDNPA response to the Stedham with Iping Submission (Regulation 16) Neighbourhood Development Plan

All references to emerging South Downs Local Plan (SDLP) policies relate to the Submission version rather than any subsequent revision (unless specified). All text to be added is underlined, all deleted text is ~~struck through~~.

Reference	Comment	SDNPA Recommendation to Examiner
	General comments	
	<p>The Parish Council is to be congratulated on having prepared a robust and locally distinctive plan for their community. The Stedham with Iping Neighbourhood Development Plan (NDP) has been developed in a relatively short space of time reflecting the commitment and determination of the Parish Council and those involved to progress to the current stage.</p> <p>The co-operation between the Parish Council and the SDNPA is recognised, particularly in relation to the Stedham Sawmills site Policy SINDP7. This has ensured that the NDP is now in conformity with and supports the SDLP allocation.</p> <p>The SDNPA appreciates the willingness of the Parish Council to be open to the suggestions made at the Pre-submission stage. As a result several changes have been made to the NDP which it is hoped will help it meet the basic conditions at Examination. These include deletions of part of the former policy SINDP2, the former policy SINDP8 relating to Land west of West Lodge, and alterations to policy SINDP7 development at Stedham Sawmills.</p> <p>In addition to the above general comments, the following points are also raised. Some of these reiterate comments previously made where it was felt important to follow through on these issues.</p>	

Policy SINDP2 – Preserving our rural character	Suggest deleting the last sentence as this could preclude slower growing locally native species from being used.	Delete the last sentence of the policy to ensure that suitable locally native species can be used irrespective of rates of growth.
Allocations for New Development, Page 17	<p>Delete the first paragraph and replace with wording to reflect the progress of the SDLP.</p> <p>Delete the reference to “within the Settlement Boundary” in the first sentence third paragraph as Policy SD26 in the emerging SDLP does not make this distinction.</p> <p>Amend the same sentence to read “; from which Stedham is identified for <u>up to 16 dwellings over the next 15 years as part of a mixed-use development at the Stedham Sawmills site, including employment uses and land for biodiversity and protection and enhancements.</u>” This is for consistency with the emerging SDLP on wording for the number of dwellings and to introduce the allocation that is the subject of Policy SINDP7.</p>	<p>Replace the first paragraph with the following to reflect the current progress of the emerging South Downs Local Plan: <u>“The South Downs Local Plan was submitted to the Secretary of State for examination in April 2018. The Planning Inspector conducted the examination including public hearings on the South Downs Local Plan in November and December 2018. The Planning Inspector has since indicated that consultation on modifications to the South Downs Local Plan will be appropriate in late January/early February 2019. South Downs National Park Authority will therefore be conducting the consultation starting at that time and lasting for eight weeks. It is anticipated the South Downs Local Plan will be adopted in summer 2019.”</u></p> <p>Amend the first sentence third paragraph to read: “The <u>emerging</u> South Downs Local Plan sets out where new housing across the National Park should be located in the future; from which Stedham is identified for <u>up to 16 dwellings over the next 15 years as part of a mixed-use development at the Stedham Sawmills site, including employment uses and land for biodiversity and protection and enhancements.</u>”</p>
Policy SINDP7 – Stedham Sawmills	As stated SDNPA welcomes the changes that have been made to this policy. It is now clearer that the allocation of the site is made in the emerging SDLP policy SD92 rather than by the NDP. The policy now adds distinctive local detail specifically in relation to the delivery of housing and the aspiration of the local community for this to be achieved through a Community Land Trust (CLT). The detail on housing delivery and local connection are key parts of this revised policy.	<p>Amend the first sentence of the policy to read “The site known as Stedham Sawmills is allocated in the <u>emerging</u> South Downs Local Plan for <u>mixed-use development of up to 16 residential dwellings, approximately 1500m² employment uses and approximately 0.35ha of land for biodiversity protection and enhancements.</u>” This is for clarity and to be in conformity with the emerging SDLP.</p> <p>Delete the second part of criteria (vi) “restricting direct pedestrian and cycle access to the A272 and the SSSI” It is</p>

	<p>However the first part of the policy needs to be more explicit in recognising that the emerging SDLP allocation is for a mixed-use development. Therefore suggest additional wording for first sentence of the policy to read “The site known as Stedham Sawmills is allocated in the <u>emerging South Downs Local Plan for mixed-use development of up to 16 residential dwellings, approximately 1500m² employment uses and approximately 0.35ha of land for biodiversity protection and enhancements.</u>”</p> <p>Vehicles currently enter the site from the A272 to the south and emerging policy SD92 in the SDLP requires that any development improves the existing access. This will also enable non-motorised access to the south of the site as is currently possible for pedestrians via the existing footpath to the east. Therefore the second part of point (vi) in the policy should be deleted as it is impractical to restrict pedestrian and cycle routes to the south from the site via the improved access.</p>	<p>impractical to restrict access to the south by non-motorised users and there is already access for pedestrians from the rest of the village from the footpath east of the site.</p>
<p>Policy SINDP8 – Unallocated residential development</p>	<p>In the second part of the policy, criteria (i) at the end of the sentence add “<u>or</u>”. This is to clarify that non-brownfield sites are included in this policy.</p> <p>Add a further criteria (ix) to the second paragraph of the policy to read “<u>does not conflict with policy SD30 Replacement Dwellings in the emerging South Downs Local Plan.</u>” To ensure the NDP is in conformity with the emerging SDLP.</p>	<p>Recommend adding “<u>or</u>” to the end of criteria (i)</p> <p>Add a further criteria (ix) to the second paragraph of the policy to read “<u>does not conflict with policy SD30 Replacement Dwellings in the emerging South Downs Local Plan.</u>”</p>
<p>Policy SINDP10 – The Small Business Economy</p>	<p>For clarity add the wording in the policy “<u>and other relevant policies in the development plan</u>” at the end of the first sentence and the end of point I)</p>	<p>In the policy add the wording “<u>and other relevant policies in the development plan</u>” at the end of the first sentence and the end of point I) for clarity.</p>
<p>Policy SINDP11 – Communication Infrastructure</p>	<p>Note the amended wording to include support for mast sharing.</p>	<p>Suggest adding to the last sentence “<u>to protect the special qualities of the National Park</u>” to clarify the purpose of that part of the policy.</p>

	Suggest adding the words “ <u>to protect the special qualities of the National Park</u> ” to clarify the purpose of that part of the policy.	
Stedham with Iping Neighbourhood Plan Map	The comments from the Pre-Submission consultation are reiterated. It is noted that there are extensive notable view cones shown on the Map which show very long distance expansive views of open countryside without clear focal points. The usefulness of these view cones for planning officers when assessing planning applications is questioned. It is suggested more localised notable views of both the landscape and important buildings are identified looking from within and out of the settlements. Historic England has produced useful guidance for assessing views which may be of help. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/	Recommend that notable views are shorter and have specific focal points such as an important building, view down a street or lane or an important public view of the countryside when looking out from the settlement.
	Other Matters	
Page 3 The Purpose of a Neighbourhood Plan first paragraph	Delete and replace this paragraph with the following to clarify the status of the NDP: <u>‘Once it has been agreed at referendum and ‘made’, a neighbourhood plan becomes part of the statutory ‘development plan’ for that part of the National Park within the parish of Stedham and Iping and used in the determination of planning applications.’</u>	For clarity delete the first paragraph in the section The Purpose of a Neighbourhood Plan and replace with: <u>‘Once it has been agreed at referendum and ‘made’, a neighbourhood plan becomes part of the statutory ‘development plan’ for that part of the National Park within the parish of Stedham and Iping and used in the determination of planning applications.’</u>
Page 4 second paragraph	For clarity delete last sentence of second paragraph and replace with: <u>“SDNPA designated the neighbourhood area on 1 August 2017.”</u>	For clarity delete last sentence of second paragraph and replace with: <u>“SDNPA designated the neighbourhood area on 1 August 2017.”</u>
Page 5 second paragraph	To update the second paragraph, delete reference to Pre-Submission version September 2017. Sentence to read “The SINDP needs to be in general conformity with both the saved policies of the Chichester	Update second paragraph to read: “The SINDP needs to be in general conformity with both the saved policies of the Chichester District Local Plan 1999 and the emerging South Downs National Park Local Plan: Pre-submission version September 2017. ”

	District Local Plan 1999 and the emerging South Downs National Park Local Plan: Pre-submission version September 2017.	
Page 9 third paragraph second sentence	Delete the second sentence to reflect the current situation at Minsted sand-pit. Add new sentence to read: “A large commercial sand-pit known as Minsted sand-pit, adjacent to Stedham Common, is currently under suspension pending the submission of outstanding Environmental Impact Assessments documents pertaining to a Review of an Old Minerals Permission (ROMP) application”.	Delete second sentence and add new sentence to read: “A large commercial sand-pit known as Minsted sand-pit, adjacent to Stedham Common, is currently under suspension pending the submission of outstanding Environmental Impact Assessments documents pertaining to a Review of an Old Minerals Permission (ROMP) application”.