

SDNPA response to Upper Beeding Submission Neighbourhood Development Plan

The comments set out below are the South Downs National Park Officers views made 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>We would like to congratulate the Parish Council on reaching this advanced stage of the Neighbourhood Development Plan (NDP) and in producing a clear and well laid out NDP.</p> <p>The SDNPA made detailed comments during the pre-submission consultation period and we welcome the changes that have been made to the NDP in response to these comments. Many of the changes we sought have been incorporated into the submission NDP, such that our comments at this stage are far more limited in scope. We have made some recommendations 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>	N/A
Planning Policy Context	<p>The SDLP has been through Examination and was out for consultation on Main Modifications from 1st February to 28th March 2019. This is the final stage of the SDLP process before adoption.</p> <p>In response to our previous comments, relevant SDLP policies have been listed in section 3. The three SDLP core policies provide the overarching framework for evaluating all development proposals in the National Park, therefore <i>SD2 Ecosystem Services</i> and <i>SD3 Major Development</i> should be added to the list of relevant policies.</p>	<p>Update details of stage SDLP has reached.</p> <p>Include SD2 and SD3 in list of relevant policies.</p>
Chapter 5 Vision and Objectives	<p>Helpful revisions have been made to the Vision in response to our previous comments. There are 7 special qualities of the SDNP, all of equal importance. We'd therefore suggest removing reference to landscape in</p>	<p>We recommend that the first part of the Vison is re-worded to say: Upper Beeding and Small Dole will have retained their own distinctive characters and they will have worked successfully</p>

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	this instance.	with the South Downs National Park Authority (SDNPA) and West Sussex County Council (WSSCC) to; protect the special qualities of the South Downs National Park <u>landscape,</u>
Spatial Strategy; Para 6.1	<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 National Park for the community), there is also potential to improve connections from the Parish to the South Downs Way and the South Downs Link.</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 National Park for the community <u>and provides better connections from the Parish to the South Downs Way and South Downs Link.</u></p>
Spatial Strategy; Para 6.10	As commented elsewhere, policies of the SDLP are also relevant and should be referred to here.	<p>Include reference to SDLP policies:</p> <p>“For all other planning matters, the national and local policies of planning documents – the National Planning Policy Framework and the policies of the Horsham Planning Framework <u>and South Downs Local Plan</u> are to be referred to.”</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 Lane, Upper Beeding	<p>We welcome the reference to a landscape-led masterplan for this site within the policy text and the accompanying supporting text which explains a landscape-led approach. We also welcome the inclusion of criteria I(a)-(d) within the policy.</p> <p>We appreciate the policy refers to visibility and key views and welcome this addition. However, we'd like to emphasise the potential impact of the roofscape and wish to see direct reference to this in the policy. We also</p>	<p>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"> • Ib) Regard should be given to visibility and key views, especially from the SDNP which should inform the earliest stages of design and layout. <u>The roofscape will be a significant aspect of this assessment and how it will appear in these views.</u>

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	<p>consider the policy could be more effective in highlighting opportunities to improve Green Infrastructure (GI) and recommend criteria 11 makes specific reference to GI. New and additional GI should also be characteristic of the landscape character area.</p>	<ul style="list-style-type: none"> 11. Support is given to the provision of Sustainable Drainage (SuDs) and the opportunity to create and habitats and biodiversity <u>through additional characteristic green infrastructure.</u>
<p>Policy 5 – Land at Greenfields, Henfield Road, Upper Beeding</p>	<p>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. We appreciate the policy refers to visibility and key views and welcome this addition. However, we’d like to emphasise the potential impact of the heights of buildings and roofscape design. We would therefore recommend direct reference to these in the policy. We’d also recommend that the landscape buffer and transition with the SDNP is characteristic of the local landscape character area.</p>	<p>We recommend the following additional wording is included within the policy criteria:</p> <ul style="list-style-type: none"> Visibility and views from the National Park should inform the earliest stages of design <u>including heights of buildings and the design of the roofscape;</u> An appropriate <u>A characteristic</u> landscape buffer and transition with the National Park boundary should be provided.
<p>Policy 7 – New Development to provide further Care Home provision at Valerie manor, Henfield Road, Upper Beeding</p>	<p>We welcome the addition to supporting text requiring a landscape-led approach to this site. We also welcome the reference to the inclusion of dementia friendly outdoor space.</p> <p>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. In response to these factors, we consider the policy would be more effective if it requires the design and landscaping to respond to identified landscape, cultural and visual sensitivities of the SDNP.</p>	<p>We recommend the following additional wording is included within the policy criteria:</p> <ul style="list-style-type: none"> 2. The development <u>design and landscaping positively respond to the identified landscape, cultural and visual sensitivities of the SDNP</u> does not adversely affect the landscape character of the South Downs National Park or have a detrimental visual impact on the National Park. <p>We note the following typos in paragraph 7.56 “The landscaping should be designed in partnership with the new built from form to deliver a useable space which provides safe, interesting space for residents to leave <u>lead</u> fulfilling lives.”</p>

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	<p>Proposed use: It's not clear in the supporting text/policy and there is no link with AECOMs assessment (7-18 additional units / 30 extra bedrooms).</p> <p>It's also unclear whether this development is a standalone facility i.e. type of bedrooms, communal facilities, parking requirements (50 extra staff), reception/staff areas, outside space etc, <u>or</u> if it's going to complement the existing residential care home?</p> <p>Both have significant impact on design.</p> <p>In accordance with SD5 & SD48 of the South Downs Local Plan:</p> <ol style="list-style-type: none"> 1. The development proposal will include an extensive site and context appraisal, to demonstrate that they have properly considered the impact of their proposal and taken into account all relevant factors in the design of the scheme. 2. The development should respect the existing form, scale, siting, massing, materials of the listed building, respond to site topography and respect views and panoramas of the National Park and Hyde Street Conservation Area. 3. The development should use building techniques, decoration and styles to enhance the appearance of the proposal, having regard to texture, colour, pattern, durability and craftsmanship in the use of local materials. 4. The development should include landscape proposals in order that they improve local GI and integrate into their surroundings; taking into account the appearance of the existing landscape and its intrinsic character. 5. The development must meet the building performance criteria set out in SDNP Policy SD48. 	

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Policy 8 – Design Standards for New Development; second sentence	We welcome and support the revisions made to this policy in response to our comments made during the pre-submission consultation. Further amendments are sought in line with SDLP Policy SD5 and SD48.	<p>Amendment: Within the SDNP or its setting... development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive design that makes a positive contribution to the overall character and appearance of the area.</p> <p>Add: Within the SDNP development proposals should meet minimum sustainability credentials, as set out below</p> <ul style="list-style-type: none"> a) At least 19% reduction in CO2 emissions relative to building regulations baseline via energy efficiency of the built fabric. b) At least 20% reduction in CO2 emissions relative to building regulations baseline via low/zero carbon energy on site, eg. PV. c) No more than 105 litres/person/day predicted internal mains water consumption.
Policy 10 – Employment Sites and Supporting Businesses	The Courtyard and Beeding Court employment sites referenced in the policy are located within the SDNP. This policy therefore needs to reflect the wording of the strategic employment policy (SD35 <i>Employment Land</i>) in the SDLP as it may have the potential to conflict with this otherwise.	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.