

SDNPA response to Steyning Pre-submission Neighbourhood Development Plan October 2019

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

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. We recognise that this plan has been prepared within a relatively short time frame and therefore addresses a limited scope of issues. However, we welcome the focus on the natural environment, design and green spaces which are key to the Purposes of the National Park.</p> <p>Nearly a third of the parish area lies within the South Downs National Park (SDNP). We therefore welcome the prominence given to promoting the parish as a key gateway to the National Park in the Vision. We would request that the National Park boundary is clearly shown on the Policies Maps.</p> <p>The Plan is called 'Steyning Community Plan', we consider this may lead to confusion over the status of the Plan and recommend that the plan is titled 'Steyning Neighbourhood Plan' or NDP so it is clear it has been prepared under the relevant legislation and has the status of NDP once made i.e. it will be part of the Development Plan for the parish of Steyning.</p>	<p>Show the National Park boundary on the Policies Maps.</p> <p>Re-title the Plan 'Steyning Neighbourhood Plan' or 'Steyning Neighbourhood Development Plan'.</p>
About Steyning Parish	<p>A useful section on the biodiversity of the Parish is included from 2.34 to 2.41. It would be helpful to have a map of the wildlife sites referred to in this section within the Plan at this point.</p>	<p>Include a map of designated wildlife sites within the Plan.</p>
Policy SCPI	<p>We welcome and support the inclusion of river corridors in the Green Infrastructure and Biodiversity policy. The Arun River Corridor is identified in the SDNPA's emerging Green Infrastructure Framework as a Green Infrastructure Investment Area.</p>	

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Policy SCP2	<p>We welcome the focus of SCP2 <i>Responsible Design</i> and suggest the policy could be strengthened by including measurable targets, for example: a 19% CO2 reduction improvement against Part L (2013) Building Regulations. This target is included in SD48 of the Local Plan and will apply to proposals within the SDNP.</p>	<p>Include measurable targets within the policy.</p>
Community Resources	<p>We welcome the reference to Community Infrastructure Levy (CIL) under Community Resources. Paragraph 6.7 refers to a policy which appears to have been omitted from the Plan. It is useful for a NDP to set out a list of priorities for CIL funding although this does not need to be in the form of a policy and can be a list of aspirations / actions. The Plan should also acknowledge that other sources of funding will be required to make many of the aspirations / action happen.</p>	<p>Include a list of priority projects for CIL funding.</p>
Local Green Space	<p>We note the proposed designation of five Local Green Spaces, four of which are within the SDNP. We would refer the Parish Council to the NPPF which states LGS designation should only be used where green space is <i>demonstrably special to the local community and holds a particular local significance</i> and that <i>designating land as LGS should be consistent with the local planning of sustainable development</i>.</p> <p>A detailed background paper sets out the analysis and assessment of proposed LGS in support of this policy. The methodology for assessing LGS includes a criterion for 'landscape fringe quality and view/vantage point re the Conservation Area'. This does not correspond to the NPPF LGS criteria, although the evidence presented may be relevant to other criteria such as historical significance or beauty.</p> <p>We would recommend the Plan includes details of the reasons for designation for each LGS included in the Plan.</p> <p>Three of the proposed LGS are within the Wiston Estate. The SDNPA has endorsed the Wiston Whole Estate Plan (WEP) and it is</p>	<p>Include within the Plan a short paragraph for each LGS with reasons for its designation.</p> <p>Ensure LGS assessment methodology is consistent with the NPPF.</p> <p>Include LGS reasons for designation with the Plan.</p> <p>Cross-refer to the Wiston Whole Estate Plan and liaise</p>

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	recommended that the NDP cross-refers the WEP and that the Parish Council liaises with the Estate to discuss how the WEP and Neighbourhood Plan can achieve the delivery of both Visions.	with the Estate.